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IN THE CIRCUIT COURT OF THE 17TH JUDICIAL
CIRCUIT IN AND FOR BROWARD COUNTY, FLORIDA

CASE NO. CACE15-022039 (13)

FRED BELIARD,

Plaintiff,

v.

KENT SECURITY SERVICES, INC.,

Defendant.

DEFENDANT'S RESPONSES AND OBJECTIONS TO PLAINTIFF'S REQUEST FOR PRODUCTION

Defendant, KENT SECURITY SERVICES, INC.¹, by and through the undersigned attorneys, and pursuant to Florida Rule of Civil Procedure 1.350 hereby responds and objects to the Plaintiff, FRED BELIARD's Request for Production bearing a Certificate of Service date of February 13, 2016, as follows:

1. Any and all statements of the Plaintiff and/or Plaintiffs agents.

KENT SECURITY SERVICES, INC. objects to this Interrogatory as KENT SECURITY SERVICES, INC., as purported to be sued by Plaintiff, FRED BELIARD, in this action by his Complaint, is not a properly named Defendant in this action. Defendant further objects to this Request as vague, overbroad, not limited in

¹ KENT SECURITY SERVICES, INC., as purported to be sued by Plaintiff, FRED BELIARD, in this action by his Complaint, is not a properly named Defendant in this action. Notwithstanding, in an effort to be responsive, this Request for Production will be responded to on behalf of KENT SECURITY OF PALM BEACH, INC., the properly named Defendant in this action.

**scope and time (“any and all statements of the Plaintiff and/or Plaintiff’s agents.)
Notwithstanding these objections and without waiving them, there are none.**

2. All photographs in the possession of the Defendants, its agents, or attorneys of the accident scene and the persons involved.

KENT SECURITY SERVICES, INC. objects to this Interrogatory as KENT SECURITY SERVICES, INC., as purported to be sued by Plaintiff, FRED BELIARD, in this action by his Complaint, is not a properly named Defendant in this action. Defendant further objects to this Request as vague, overbroad, not limited in scope and time (“all photographs in the possession of the Defendants, its agents, or attorneys of the accident scene and the persons involved”) Notwithstanding these objections and without waiving them, there are none.

3. Any and all photographs and/or movies of the Plaintiffs resulting from surveillance and/or investigation of the Plaintiffs.

KENT SECURITY SERVICES, INC. objects to this Interrogatory as KENT SECURITY SERVICES, INC., as purported to be sued by Plaintiff, FRED BELIARD, in this action by his Complaint, is not a properly named Defendant in this action. Defendant further objects to this Request as vague, overbroad, not limited in scope and time (“all photographs and/or movies of the Plaintiffs resulting from surveillance and/or investigation of the Plaintiffs”) Notwithstanding these objections and without waiving them, there are none.

4. Copy of the incident or accident report prepared in response to the within accident.

KENT SECURITY SERVICES, INC. objects to this Interrogatory as KENT SECURITY SERVICES, INC., as purported to be sued by Plaintiff, FRED BELIARD, in this action by his Complaint, is not a properly named Defendant in this action. Defendant further objects to this Request as it seeks documents which are protected by the work-product privilege. Notwithstanding these objections and without waiving them, see Defendant's Privilege Log.

5. Any and all incident/accident reports for accidents during the two years preceding this accident that have occurred in the same general location and which are of the same general type of accident as the accident complained of in the within suit.

None.

6. Any and all maintenance and/or cleaning or inspection records during the one week preceding this accident for the particular are of the store/premises/building involved in the within accident.

KENT SECURITY SERVICES, INC. objects to this Interrogatory as KENT SECURITY SERVICES, INC., as purported to be sued by Plaintiff, FRED BELIARD, in this action by his Complaint, is not a properly named Defendant in this action. Defendant further objects to this Request as vague, overbroad, irrelevant and not reasonably calculated to lead to the discovery of relevant evidence as the allegations set forth in Plaintiff's Complaint do not involve maintenance and/or cleaning or inspection records of a store/premises or building.

7. Any and all safety manuals, safety brochures, training films or manuals, pamphlets, posters, films or their transcript bearing upon safety, customer safety, cleanliness and maintenance of the area where the accident occurred.

KENT SECURITY SERVICES, INC. objects to this Interrogatory as KENT SECURITY SERVICES, INC., as purported to be sued by Plaintiff, FRED BELIARD, in this action by his Complaint, is not a properly named Defendant in this action. Defendant further objects to this Request as vague, overbroad, irrelevant and not reasonably calculated to lead to the discovery of relevant evidence as the allegations set forth in Plaintiff's Complaint do not involve cleanliness and maintenance of an area where this incident occurred.

8. Any and all letters, complaints, telephonic messages etc., concerning the condition of the area where the Plaintiff fell during the one year preceding this accident and the one year subsequent to this accident.

KENT SECURITY SERVICES, INC. objects to this Interrogatory as KENT SECURITY SERVICES, INC., as purported to be sued by Plaintiff, FRED BELIARD, in this action by his Complaint, is not a properly named Defendant in this action. Defendant further objects to this Request as vague, overbroad, irrelevant and not reasonably calculated to lead to the discovery of relevant evidence as the allegations set forth in Plaintiff's Complaint do not involve a fall of the Plaintiff.

9. All documents that reflect the periodic inspection process on the day of the incident which is the subject matter of this lawsuit.

KENT SECURITY SERVICES, INC. objects to this Interrogatory as KENT SECURITY SERVICES, INC., as purported to be sued by Plaintiff, FRED BELIARD, in this action by his Complaint, is not a properly named Defendant in this action. Defendant further objects to this Request as vague, overbroad, irrelevant and not

reasonably calculated to lead to the discovery of relevant evidence.

Notwithstanding these objections and without waiving them, there are none.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy hereof has been furnished by service through the eportal to Alan Elkins, Esq., Elkins & Freedman, 6400 North Andrews Avenue, Suite 300, Ft. Lauderdale, FL 33309, Attorney for Plaintiff, pleadings@elkinsandfreedman.com on this 4th day of April, 2016.

CONROY SIMBERG
Attorney for Kent Security Services, Inc.
3440 Hollywood Boulevard, Second Floor
Hollywood, FL 33021
Telephone: (954) 961-1400 Broward
Facsimile: 954-518-8660
Primary Email: eservicehwd@conroysimberg.com
Secondary Email: sgoldberg@conroysimberg.com
sgreco@conroysimberg.com

By: /s/ Stephan M. Greco
Seth R. Goldberg, Esq.
Florida Bar No. 032204
Stephan M. Greco, Esq.
Florida Bar No. 0129100

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