

# **EXHIBIT A**

**IN THE CIRCUIT COURT OF THE SEVENTH JUDICIAL CIRCUIT IN AND FOR  
VOLUSIA COUNTY, FLORIDA**

MARIA ZUBIETA,  
Plaintiff,

v.

KESTREL HOME CENTER, LLC,  
a Florida limited liability company,  
Defendant.

CASE NO.: 2026 10\_\_ CICI

**PLAINTIFF'S FIRST REQUEST FOR PRODUCTION TO DEFENDANT**

Plaintiff, MARIA ZUBIETA, requests under Florida Rule of Civil Procedure 1.350 that Defendant, KESTREL HOME CENTER, LLC, produce the following within 30 days after service, by e-mail to undersigned counsel:

1. All video recordings from any camera that shows aisle 14 of Defendant's Daytona Beach store between 11:00 a.m. and 11:40 a.m. on October 18, 2025.
2. Defendant's written policies and procedures for inspecting and cleaning the store's floors, in effect on October 18, 2025.
3. All sweep, inspection, and maintenance logs for aisle 14 for October 18, 2025.
4. All incident reports, written statements, and photographs concerning Plaintiff's fall.
5. Every insurance policy that may cover Plaintiff's claim, including its declarations page.
6. All records of spills or leaks in aisle 14 in the 90 days before October 18, 2025.

CERTIFICATE OF SERVICE. I certify that on June 10, 2026, I served this request by e-mail on Claire Whitcombe, Whitcombe Law Group, P.A., counsel for Defendant, at [cwhitcombe@whitcombelaw.example](mailto:cwhitcombe@whitcombelaw.example) and [eservice@whitcombelaw.example](mailto:eservice@whitcombelaw.example).

TEMKO & EDEN, P.A.  
Beach Street, Daytona Beach, Florida 32114  
(386) 555-0142  
/s/ Kim Nguyen  
Kim Nguyen, Florida Bar No. XXXXXXXX  
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Counsel for Plaintiff

# **EXHIBIT B**

**IN THE CIRCUIT COURT OF THE SEVENTH JUDICIAL CIRCUIT IN AND FOR  
VOLUSIA COUNTY, FLORIDA**

MARIA ZUBIETA,  
Plaintiff,

v.

CASE NO.: 2026 10\_\_ CICI

KESTREL HOME CENTER, LLC,  
a Florida limited liability company,  
Defendant.

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**DEFENDANT'S RESPONSE TO PLAINTIFF'S FIRST REQUEST FOR PRODUCTION**

Defendant, KESTREL HOME CENTER, LLC, responds to Plaintiff's First Request for Production under Florida Rule of Civil Procedure 1.350(b):

1. Objection. The recording is material Defendant may use to test Plaintiff's account, and Plaintiff's testimony should be taken before she views it. Subject to this objection, Defendant will produce the recording from Camera 14-B after Plaintiff's deposition is taken.

2. Produced: Floor Safety Standards, revised March 2025 (KHC 0001-0012).

3. Produced: Aisle Sweep Log for October 18, 2025 (KHC 0013-0014).

4. Objection: work product. The manager's full incident report and the associate's written statement were prepared in anticipation of litigation, and a privilege log is served with this response. The customer copy of the incident report, given to Plaintiff on October 18, 2025, is in her possession.

5. Defendant is insured under commercial general liability Policy No. CGL 4418 2207 5530, issued by Seagrape Mutual, which has assigned Claim No. SMP-25-104417. The declarations page is produced (KHC 0015-0017).

6. None found after a reasonable search.

CERTIFICATE OF SERVICE. I certify that on July 10, 2026, I served this response by e-mail on Kim Nguyen, Temko & Eden, P.A., counsel for Plaintiff, at kim.nguyen@temkoeden.example and eservice@temkoeden.example.

WHITCOMBE LAW GROUP, P.A.

Orlando, Florida

(407) 555-0163

/s/ Claire Whitcombe

Claire Whitcombe, Florida Bar No. XXXXXXXX

cwhitcombe@whitcombelaw.example (primary)

eservice@whitcombelaw.example (secondary)  
Counsel for Defendant

# **EXHIBIT C**

**IN THE CIRCUIT COURT OF THE SEVENTH JUDICIAL CIRCUIT IN AND FOR  
VOLUSIA COUNTY, FLORIDA**

MARIA ZUBIETA,  
Plaintiff,

v.

CASE NO.: 2026 10\_\_ CICI

KESTREL HOME CENTER, LLC,  
a Florida limited liability company,  
Defendant.

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**DEFENDANT'S INITIAL DISCLOSURES**

Defendant, KESTREL HOME CENTER, LLC, makes these initial discovery disclosures under Florida Rule of Civil Procedure 1.280(a).

**A. Individuals likely to have discoverable information**

1. Maria Zubieta, Plaintiff, Port Orange, Florida; telephone (386) 555-0187; e-mail maria.zubieta@mail.example; to be contacted through her counsel. Subjects: the incident and her claimed injuries and damages.

2. R.T., manager on duty at the Daytona Beach store on October 18, 2025; to be contacted through undersigned counsel. Subjects: the incident report, the store's response, and the recording.

3. Owen Castellow, stock associate, a minor (date of birth 08/21/2009), who responded to Plaintiff's fall and called the manager; to be contacted through undersigned counsel. Subjects: the condition of aisle 14 and what he saw after the fall.

**B. Documents, electronically stored information, and tangible things**

1. Video recording from Camera 14-B, Daytona Beach store, October 18, 2025, 11:05 a.m. to 11:35 a.m., kept by Defendant's loss prevention department.

2. Customer Incident Report dated October 18, 2025 (store copy), which records Plaintiff's date of birth, 03/14/1979, and her Florida driver license number, [REDACTED].

3. Kestrel Pro Rewards account record for Plaintiff, account no. 7300 5521 0184 6632, showing her purchase at 11:08 a.m. on October 18, 2025, paid with a debit card ending in [REDACTED].

4. Floor Safety Standards, revised March 2025, and the Aisle Sweep Log for October 18, 2025.

**C. Damages**

Defendant claims no damages.

**D. Insurance**

Commercial general liability Policy No. CGL 4418 2207 5530, issued by Seagrape Mutual. A copy of the policy is produced (KHC 0018-0074).

CERTIFICATE OF SERVICE. I certify that on June 19, 2026, I served these disclosures by e-mail on Kim Nguyen, Temko & Eden, P.A., counsel for Plaintiff, at kim.nguyen@temkoeden.example and eservice@temkoeden.example.

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/s/ Claire Whitcombe

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Counsel for Defendant