

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

MARIA ZUBIETA,
Plaintiff,

CASE NO.: 2026 10__ CICI

v.

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

_____/

DEFENDANT'S FIRST SET OF INTERROGATORIES TO PLAINTIFF

Defendant, KESTREL HOME CENTER, LLC, serves the following interrogatories on Plaintiff, MARIA ZUBIETA, to be answered separately and fully, in writing and under oath, within 30 days of service.

1. State your full name, any other names you have used, your date of birth, and your current address.
2. List each employer you have had in the last five years, with your job title, dates of employment, and rate of pay.
3. Describe in detail how the incident described in the Complaint happened, including what you were doing, where you were looking, and what you were wearing on your feet.
4. Describe each injury you claim to have suffered in the incident, and state whether you have fully recovered from it.
5. List each health care provider who has treated you for any injury you claim resulted from the incident, with the dates of treatment and the amount charged.
6. State whether you suffered any injury to your back, neck, arms, wrists, or hands before the incident, and for each one, when it happened and who treated you.
7. List each person you know of who saw the incident or its aftermath, with the person's address and telephone number.
8. List each item of damages you claim, with the amount and how you calculated it.

CERTIFICATE OF SERVICE. I certify that on June 3, 2026, I served these interrogatories by email on Kim Nguyen, Temko & Eden, P.A., counsel for Plaintiff.

WHITCOMBE LAW GROUP, P.A.
/s/ Claire Whitcombe
Claire Whitcombe
Counsel for Defendant