

**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 REQUEST FOR PRODUCTION TO PLAINTIFF

Defendant, KESTREL HOME CENTER, LLC, requests that Plaintiff, MARIA ZUBIETA, produce the following within 30 days of service, at the offices of Whitcombe Law Group, P.A., or by email to undersigned counsel:

1. All photographs and video of the place where the incident happened, and of your injuries.
2. The footwear you were wearing at the time of the incident, for inspection at a time agreed by counsel.
3. All medical records and itemized bills for treatment you claim resulted from the incident.
4. All documents that support your claim for lost wages.
5. All receipts, reports, or other documents you received from Defendant or its employees on the day of the incident.
6. All posts you have made on social media about the incident or your injuries since October 18, 2025.

CERTIFICATE OF SERVICE. I certify that on June 3, 2026, I served this request 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