

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

CASE NO.: 2020-CA-000462
DIVISION:

TAMMY MICHELLE BIZIER, as Personal
Representative of the Estate of Mario Joseph Bizier,
Deceased,

Plaintiff,

vs.

BROOKE ANNA LORENZEN, an individual,

Defendant.

PLAINTIFF'S MOTION TO COMPEL
DEFENDANT BROOKE ANNA LORENZEN'S DEPOSITION

The Plaintiff, Tammy Michelle Bizier, as Personal Representative of the Estate of Mario Joseph Bizier, deceased, pursuant to the Florida Rules of Civil Procedure, and through her undersigned attorneys, files this Motion to Compel Defendant, Brooke Anna Lorenzen's Deposition, and in support states the following:

1. This case arises out of a motor vehicle accident that occurred on May 6, 2019.
2. The undersigned counsel's office has made multiple attempts to obtain a mutually convenient date and time for Defendant, Brooke Anna Lorenzen's deposition.
3. While Defendant's counsel's office states that they will provide dates, to date, none have been provided.

WHEREFORE, Plaintiff, Tammy Michelle Bizier, as Personal Representative of the Estate of Mario Joseph Bizier, deceased, requests this Honorable Court enter an Order compelling the deposition of Defendant Brooke Anna Lorenzen at a mutually convenient date and time and for any

other relief as deemed equitable and just.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished to **Michael D. McCoy, Esquire**, Cole, Scott & Kissane, P.A., 4686 Sunbeam Road, Jacksonville, Florida 32257, Michael.mccoy@csklegal.com; peggy.labs@csklegal.com, *Attorneys for Defendant Brooke Anna Lorenzen*; via e-service on this 7th day of September, 2021.

HARRELL & HARRELL, P.A.

/s/ W. Holt Harrell

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