

IN THE CIRCUIT COURT OF THE 11TH
JUDICIAL CIRCUIT IN AND FOR
MIAMI-DADE COUNTY, FLORIDA

GENERAL JURISDICTION DIVISION

CASE NO. 2025-001578-CA-01
JUDGE: Beatrice Butchko Sanchez (CA22)

GIANCARLO SCHWARZ and
DIANA SCHWARZ, as parents and
natural guardians of G.S., a minor

Plaintiffs,

vs.

CITY OF NORTH MIAMI BEACH,
a Political Subdivision of the State of Florida,

Defendant.

REQUEST FOR PRODUCTION TO DEFENDANT

COMES NOW, the Plaintiff, by and through undersigned counsel, and pursuant to the applicable Rules of Civil Procedure, request the Defendant to produce the following for inspection and/or copying at the offices of the undersigned attorney within the allowed time as follows:

1. A complete list of the students' names and addresses in attendance at Defendant's facility on the date of Plaintiff's occurrence.
2. The incident report for Plaintiff's subject occurrence.
3. Any and all photographs taken at the scene of Plaintiff's subject occurrence.
4. Any videotape that captured or recorded Plaintiff's subject occurrence.
5. A list or roster of aides, teachers, staff or employees in attendance at Defendant's facility on the date of Plaintiff's subject occurrence.

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6. Any statements taken from "Michael", a student present on the date of Plaintiff's subject occurrence.
7. Any statements taken from "Francisco", a student present on the date of Plaintiff's subject occurrence.
8. Any statements taken from "Max", a student present on the date of Plaintiff's subject occurrence.
9. Any statements taken from "Ian", a student present on the date of Plaintiff's subject occurrence.
10. Any and all statements taken from Gabriel Ayesyes, coach/staff member regarding Plaintiff's subject occurrence.
11. Any and all photographs or video taken of Plaintiff following his subject occurrence.
12. Any and all accident forms or injury forms completed by Plaintiff's parents regarding the subject occurrence.
13. Any and all statements of Defendant's agents, servants or employees completed in the course of business and/or as a requirement for Y.E.S.'s policy regarding Plaintiff's subject occurrence.
14. A student attendance record for the date of Plaintiff's subject occurrence.
15. Policies, protocols and procedures for the operation of the subject facility where Plaintiff's injury occurred in effect on the date of the subject occurrence.
16. Any and all safety protocols, safety plans, memos concerning safe operation of the subject facility in effect on the date of Plaintiff's subject occurrence.
17. Any and all documents used to train Defendant's employees on safe operation of the subject facility, including use of the playground equipment in effect on the date of Plaintiff's subject occurrence.
18. Any and all product guides, manufacturer specifications, manufacturer's instructions, operating instructions for use of the equipment where Plaintiff's subject injury occurred.
19. Any and all operating guidelines for the playground equipment in place at Defendant's facility on the date of Plaintiff's subject occurrence.

20. Any training videos, training materials, brochures, handouts or other written documents provided to Defendant's employees to train them in the safe operation of playground equipment at Defendant's facility prior to the occurrence herein.

21. Any guidelines, instructions from any State agency or entity concerning staffing requirements for the subject facility, Staff training, student to staff ratio or other rules and regulations concerning after school facility operation.

22. Any facility inspection reports from any governmental agency of the subject facility that took place within the preceding 3 years.

As grounds for the foregoing Request, the Plaintiffs are unable, without undue hardship, to obtain the substantial equivalent of same by other means.

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that a true and correct copy of the foregoing was sent via E-Mail this July 21, 2025, to GREENSPOON MARDER LLP Ahmand R. Johnson, Esq., ahmand.Plaintiffs@gmlaw.com; joseph.geller@gmlaw.com; Attorneys for Defendant *The City of North Miami Beach*.

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By: /s/ Jeffrey R. Davis
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