

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

GENERAL JURISDICTION DIVISION

BELINDA CAMPBELL,

Plaintiff,
vs.

NCL (Bahamas) L.T.D. d/b/a NCL

Defendant.
_____ /

CASE NO: 11-13095 CA 25

RESPONSE DUE: 6-13-2011

**PLAINTIFF'S NOTICE OF SERVING FIRST SET OF
INTERROGATORIES TO DEFENDANT NCL (Bahamas) L.T.D. d/b/a NCL**

COMES NOW, Plaintiff, BELINDA CAMPBELL, by and through the undersigned counsel, files his Notice of Serving First Set of Interrogatories upon the Defendant, NCL (Bahamas) L.T.D. d/b/a NCL, and requests same be answered within the manner and time prescribed by the Florida Rules of Civil Procedure.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served along with the Complaint and Summons upon the registered agent of the above mentioned Defendant.

Dated: 4/22/2011

Robert C. Gross, P.A.
9400 South Dadeland Blvd., Suite 300
Miami, Florida 33156
Telephone: (305) 670-9009
Fax: (305) 670-8009
Email: Rgross@miamisealaw.com

Counsel of Record for Plaintiff,
BELINDA CAMPBELL
By, [Signature]
ROBERT C. GROSS
Fla. Bar No. 199478



**PLAINTIFF'S NOTICE OF SERVING FIRST SET OF
INTERROGATORIES TO DEFENDANT NCL**

1. Please identify by name, address and relationship to the defendant every person that participated in answering these interrogatories noting with particularity the nature of their participation.

2. Please identify by name, address and relationship to the Defendant every person who Defendant, it's agent or attorney's knows or believes has any information or knowledge concerning any issues in this lawsuit including but not limited to the Plaintiff's injuries, the incident alleged in the Complaint to have injured Plaintiff, the ship board medical care provided to Plaintiff, the medical care provided to Plaintiff off of the vessel and the maintenance and cure provided to Plaintiff, noting with particularity the subject matter of such knowledge or information.

3. Please set forth the nature of the relationship of the Defendant, NCL (Bahamas) L.T.D. d/b/a NCL (hereinafter NCL or "the Defendant"), and the vessel upon which the Plaintiff was injured.

4. Please identify the name(s) and address(es) of:
 - a. The owner(s) of the vessel upon which the Plaintiff was injured.

 - b. The employer(s) of the Plaintiff at the time of his injury.

5. Has anyone from NCL, or on the NORWEGIAN DAWN, investigated the incident in which the Plaintiff was injured? If so, please identify such person or persons by name, address and relationship to NCL.

6. As to all eye witnesses known now to the Defendant, state the full name; home address; home telephone number, job or position at the time of accident(s) and whether such witness is now employed by Defendant.

7. Have you heard or do you know about any statement or remark made by or on behalf of any party to this lawsuit, other than yourself, concerning any issue in this lawsuit? If so, state the name, address, and telephone number of each person who made the statement or statements and the name and address of each person who heard it, and the date, time, place and substance of each statement.

8. Describe in detail how the incident described the complaint happened, including all actions taken by you to prevent the incident.

9. Please detail whether the fire officer who sprayed the water during the subject incident was reprimanded, disciplined, cautioned or cited in any manner as a consequence of the incident and if so, please provide details as to the nature of the reprimand, discipline, caution, or citation. If something regarding this incident was noted in his personal file than please provide the details on such a notation etc.

STATE OF FLORIDA)

SS:

COUNTY OF DADE)

BEFORE ME, the undersigned authority, personally appeared _____, who () is personally known to me or () has produced _____ as identification and swears and says that (s)he has read the attached and that same is true and correct to the best of his or her information, knowledge and belief, and she/he has therefore signed and executed same for the purpose therein expressed.

Sworn and Subscribed before me this ____ day of _____, 2011.

NOTARY PUBLIC, State of Florida