

IN THE CIRCUIT COURT FOR THE CITY OF VIRGINIA BEACH

MICHAEL JETER,

Plaintiff

v.

Case No.: CL 25-5869

ALEJANDRO PERALTA,

Defendant

PLAINTIFF'S FIRST SET OF INTERROGATORIES TO DEFENDANT ALEJANDRO PERALTA

1. State your full name, present address, date of birth, and driver's license number.
2. Identify the lane in which you were traveling immediately prior to the collision, including whether traffic in your lane was moving, stopped, or congested.
3. State whether the Plaintiff's lane (the right-most through lane on S. Independence Blvd) was clear and moving at the time you attempted to enter it.
4. Describe the traffic conditions in each lane at the time of the collision.
5. Describe in detail the maneuver you attempted immediately prior to impact, including lane change and your reason for doing so.
6. State whether Plaintiff was traveling straight in the right-most through lane under a green signal.
7. State whether you observed Plaintiff brake, sound the horn, or take evasive action.
8. Explain what you saw in Plaintiff's lane before entering it.
9. State whether the right-turn-only lane was occupied and prevented Plaintiff from shifting right.
10. Describe the point of impact on both vehicles.
11. Identify any statements you made at the scene.
12. Identify all statements you provided to Allstate.
13. State whether you were using any electronic device before impact.
14. State your approximate speed before impact and whether you braked.
15. State whether you've been in collisions in the past 5 years.

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TINA E. SINNEN, CLERK
BY:  D.C.

16. Identify all witnesses known to you.
17. Identify all documents you intend to rely on at trial.
18. State your explanation for the cause of the collision.

PLAINTIFF'S FIRST REQUESTS FOR ADMISSIONS TO DEFENDANT ALEJANDRO PERALTA

1. Admit that you changed lanes immediately prior to the collision.
2. Admit that the lane you were traveling in was stopped or congested.
3. Admit that Plaintiff's lane was clear and moving.
4. Admit that you entered Plaintiff's lane.
5. Admit that you did not see Plaintiff's vehicle before impact.
6. Admit that the right-turn-only lane was blocked.
7. Admit that Plaintiff could not evade to the right.
8. Admit you did not possess dashcam footage.
9. Admit you discussed the collision with Allstate.
10. Admit you provided statements to Adjuster Treashér Lindsey.
11. Admit Plaintiff was not cited.
12. Admit you have no evidence Plaintiff was speeding.
13. Admit you have no evidence Plaintiff failed to maintain lookout.
14. Admit you have no evidence Plaintiff failed evasive action.
15. Admit your lane change caused the collision.

PLAINTIFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO DEFENDANT ALEJANDRO PERALTA

1. All photographs, videos, or recordings of the Plaintiff's vehicle, the scene, or the collision.
2. All statements you provided regarding the collision.
3. All communications between you and Allstate.
4. All communications between you and Adjuster Treashér Lindsey.
5. All repair estimates or invoices for your vehicle.

6. Any diagrams or depictions you created regarding the collision.
7. Your cellular phone records from 1 hour before to 1 hour after the collision.
8. Any GPS, telematics, or location data from your vehicle.
9. Any EDR ("black box") data.
10. Your driver's license, registration, and insurance documentation.
11. All communications with any witness.
12. All documents you intend to use at trial.

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing **Interrogatories, Requests for Admissions, and Requests for Production** was filed with the Clerk of the Virginia Beach Circuit Court on this date, with instructions that the Virginia Beach Sheriff's Office effect service upon:

Alejandro Peralta
993 Edwin Dr
Virginia Beach, VA 23464

The Clerk is requested to issue the necessary service documents to the Sheriff, and the **Sheriff's Return of Service** will be filed in the record when completed.

Michael Jeter

Date: 12/09/2025

Norfolk, VA 23508

Date

DEC 09 2025

Michael Jeter

IN THE CIRCUIT COURT FOR THE CITY OF VIRGINIA BEACH

MICHAEL JETER,

Plaintiff

v.

Case No.: CL 25-5869

Allstate Insurance Company

Defendant (Insurer)

To be served through its authorized agents:

Hayfield Insurance Agency and Financial Services, Inc.

6923 Telegraph Road

Alexandria, VA 22310

Beau Burgess Proctor

Woodbridge, VA 22191-1305

Kidds Insurance Services, LLC (Gina Kidd, Agent)

1360 American Way

Bedford, VA 24523

**PLAINTIFF'S FIRST DISCOVERY REQUESTS TO ADJUSTER TREASHER
LINDSEY**

INTERROGATORIES

1. State your full name, job title, training history, certifications, and all claims-handling courses completed.
2. Describe your role in evaluating Claim No. 0806474177 LIA, including every task performed and every document reviewed.

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TINA E. SINNEN, CLERK
BY:  D.C.

3. Identify all evidence reviewed before determining Plaintiff was speeding or failed to yield.
4. Explain the exact process used to determine Plaintiff's speed, lookout, or evasive action.
5. Identify all witnesses you contacted or attempted to contact.
6. State why you did not request Plaintiff's dashcam video, witness names, photographs, or written statements.
7. Describe your analysis of lane positions, traffic congestion, and the right-turn-only lane blockage.
8. Identify every statement made to you by Defendant Peralta including date, time, and medium.
9. Identify every communication you had with any supervisor concerning liability or denial.
10. State all Allstate claims-handling guidelines you followed and all guidelines you did not follow.
11. Identify all worksheets, checklists, and internal forms completed prior to denial.
12. Identify every category of evidence you did NOT have at the time of denial.
13. State whether you understand that claiming Plaintiff was speeding without evidence constitutes misrepresentation under Va. Code § 38.2-510(A)(1).
14. State whether any supervisor instructed you to deny the claim regardless of evidence.
15. Identify all prior complaints or disciplinary actions filed against you in your role as adjuster.

REQUESTS FOR ADMISSIONS

1. Admit you did not possess dashcam footage from Plaintiff prior to denial.
2. Admit you did not possess dashcam footage from Peralta.
3. Admit you conducted no physical scene investigation.
4. Admit you did not interview Plaintiff's eyewitnesses.
5. Admit you never requested Plaintiff's dashcam video.
6. Admit you never requested photographs or evidence from Plaintiff.
7. Admit you did not analyze lane geometry.
8. Admit you performed no speed calculation.
9. Admit you performed no braking-distance analysis.

10. Admit you had no basis to state Plaintiff was speeding.
11. Admit you had no basis to state Plaintiff failed to maintain lookout.
12. Admit you had no basis to state Plaintiff failed to take evasive action.
13. Admit you disregarded Plaintiff's eyewitnesses solely because they were occupants.
14. Admit no Virginia law allows dismissal of eyewitness testimony for being occupants.
15. Admit you violated Allstate's claims-handling guidelines.
16. Admit you misrepresented pertinent facts in the denial letter.
17. Admit the evidence supported Plaintiff, not Peralta.
18. Admit the claim was denied without a reasonable investigation.

REQUESTS FOR PRODUCTION OF DOCUMENTS

1. All emails, texts, chat logs, or internal messages regarding Plaintiff's claim.
2. All communications with your supervisor regarding this claim.
3. All communications with Peralta.
4. All adjuster notes, logs, and diary entries.
5. All claim-denial worksheets and drafts.
6. All training manuals, guidelines, and checklists used or applicable.
7. All supervisory approval documents.
8. All recorded phone calls with Peralta or Plaintiff.
9. All evidence relied upon to assert Plaintiff was speeding.
10. All evidence relied upon to assert Plaintiff failed to maintain lookout.
11. All evidence relied upon to assert Plaintiff failed to take evasive action.
12. All internal communications about witness credibility.
13. All QA audits of this claim.
14. All documents showing required investigative steps.
15. All disciplinary records concerning your handling of Plaintiff's claim.

CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of December, 2025, I filed the foregoing PLAINTIFF'S FIRST DISCOVERY REQUESTS TO ADJUSTER TREASHÉR LINDSEY with the Clerk of the **Virginia Beach Circuit Court** and requested that the **Virginia Beach Sheriff's Office** serve a true copy of the same upon the Defendant/Insurer at the following addresses:

Allstate Insurance Company

Defendant (Insurer)

To be served through its authorized agents:

1. **Hayfield Insurance Agency and Financial Services, Inc.**
6923 Telegraph Road
Alexandria, VA 22310
2. **Beau Burgess Proctor**
Woodbridge, VA 22191-1305
3. **Kidds Insurance Services, LLC (Gina Kidd, Agent)**
1360 American Way
Bedford, VA 24523

Service will be effectuated by the Sheriff pursuant to Virginia Code § 8.01-296.

Michael Jeter

Date: _____

Norfolk, VA 23508

Email: john_foe@icloud.com

Date

DEC 09 2025

Michael Jeter