

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

BRADLEY BYRD, an individual, and
ANNA BYRD, an individual,

Plaintiffs,

v.

Case No.: 2025-CA-001320

Div.: 53

COSTCO WHOLESALE CORPORATION, a
foreign for profit corporation, COSTCO-
INNOVEL SOLUTIONS, LLC, d/b/a
COSTCO WHOLESALE LOGISTICS, a
foreign limited liability company, and RXO
LAST MILE, INC., a foreign for profit
corporation,

Defendants.

_____ /

PLAINTIFFS' INITIAL RULE 1.280 INITIAL DISCLOSURES

The Plaintiffs, Bradley Byrd and Anna Byrd, by and through undersigned counsel, pursuant to Rule 1.280(a), Florida Rules of Civil Procedure, hereby serves the following disclosures based on information known to Plaintiffs, Bradley Byrd and Ana Byrd, and their attorneys at the time of this disclosure:

A. The name and, if known, the address, telephone number, and e-mail address of each individual likely to have discoverable information – _along with the subjects of that information – _that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.

Bradley Byrd
Ana Byrd
c/o John D. Webb, Esq.
John D. Webb, PA
1662 Stockton Street, Suite 201

Jacksonville, Florida 32204
jwebb@jackwebblaw.com
(904) 803-4686
Event and Damages

Costco Representative c/o Kevin Jakab, Esq.
Jakab Law, PLLC
6277 Dupont Station Ct, Ste. 3
Jacksonville, FL 32217
(904) 683-2290
Event and damages

RXO Last Mile, Inc.
c/o Ogden, Sullivan, Stover & Saar, P.A.
5422 Bay Center Drive, Ste. 100
Tampa, FL 33609
(813) 223-5111
Event and Damages

Jake Highsmith, CPCU Regional General Adjuster Sedgwick
6640 Southpoint Pkwy, Ste. 203B
Jacksonville, FL 32216
Jacob.highsmith@sedgwick.com
Damages and investigation

Santi Clean, LLC
5930 Camp Trail
Cumming, GA 30040
dwayne@santiclean.net
Damages and Mitigation

Luce Air Quality, LLC
3420 Kori Rd., Ste. 1
Jacksonville, FL 32257
info@luceairquality.com
Damages and Mitigation

Troy Lamprecht, Indoor Environmentalist Shannon Luce, MS, Industrial Hygienist Mold and fungal assessment
EFI Global, Inc.
8091 Center Run Drive, Ste. 191
Indianapolis, IN 46250
(317) 585-6430

Water and mold damages

River City Claims

David Peter Reed, Public Adjuster
Jeanne Reed, Public Adjuster
Austin William Smith, Public Adjuster
101 East Town Place, Ste. 140
St. Augustine, FL 32259
david@rivercityclaims.com
(904) 274-4500
Losses and Damages

Deliver It Right, LLC

150012 Durbin Cove Way
Jacksonville, FL 32259
Delivery and installation of subject appliance

Integrity Contracting, LLC

St. Augustine, FL 32033
(904) 347-4794
Integritycontractingfl@gmail.com
Quote/Repair work

Woodsman Kitchens Florrs, Inc.

11732 Beach Blvd.
Jacksonville, FL 32246
(904) 641-2609
Quote/Kitchen repair work

Herring Cleaning & Restoration, LLC

239 Jones Road
Jacksonville, FL 32220
(904) 384-8427
Quote/Remediation Work

Leister Consulting Group

Quote/Repairs, damages and restoration work

B. A copy – or a description by category and location – of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control (or, if not in the disclosing party’s possession, custody or control, a description by category and location of such information) and

may use to support its claims or defenses, unless the use would be solely for impeachment.

- Temporary living expenses and receipts
- Contractor Estimates
- Emergency reports, photos, invoices and receipts
- Public Adjuster estimate
- Appliance receipt
- Remediation reports
- Insurance letter of acknowledgement
- Insurance Policy

C. A computation for each category of damages claimed by the disclosing party and a copy of the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered; provided that a party is not required to provide computations as to noneconomic damages, but the party must identify categories of damages claimed and provide supporting documents.

- Compensatory Damages in excess of \$750,000

D. A copy of any insurance policy or agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

- AAA Policy No. PKG70361728

Respectfully submitted this 5th day of January, 2026.

JOHN D. WEBB, P.A.

s/ John D. Webb _____

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on January 5, 2026, I electronically filed the foregoing with the Clerk of the Court through Florida Court's E-Filing Portal (www.myflcourtaccess.com), by using the E-Service Option, which will send a Notice of Electronic Filing, in compliance with Florida Rules of Judicial Administration Rule 2.516, to all parties and counsel of record.

s/ John D. Webb
Attorney