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IN THE CIRCUIT COURT, SEVENTH
JUDICIAL CIRCUIT, IN AND FOR
ST. JOHNS COUNTY, FLORIDA

CASE NO.: 2025-CA-001320A000MX

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

Plaintiffs,

v.

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.
_____/

DEFENDANT COSTCO WHOLESALE CORPORATION'S MOTION TO COMPEL PLAINTIFFS' ANSWERS AND RESPONSES TO DEFENDANT'S DISCOVERY REQUESTS AND TO OVERRULE PLAINTIFFS' OBJECTIONS

Defendant, Costco Wholesale Corporation, pursuant to Rules 1.280 and 1.380, Florida Rules of Civil Procedure, moves this Court to compel Plaintiffs, Bradley and Anna Byrd, to provide full answers and responses to Defendant's Interrogatories and Requests for Production (dated 12/15/25). As grounds in support of this Motion, Defendant states:

1. On December 15, 2025, Defendant propounded Interrogatories and Requests for Production to Plaintiffs. *See* **Exhibit A.**

2. On January 21, 2026, Defendant received incomplete discovery responses from Plaintiffs. *See* **Exhibit B.** In particular, Plaintiff did not respond to the following discovery:

- Request to Produce #8—tax return authorization.
- Interrogatory #1—Plaintiffs' social security numbers via phone to ensure privacy.

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- Interrogatory #5—income information for Brad Byrd and sources of income.
- Interrogatory #10—time slots and dates to inspect the refrigerator and water lines which are within Plaintiffs' custody and control.
- Interrogatory #11—Brad Byrd's answer to this interrogatory, which was answered, instead, by his wife, Anna Byrd.
- Interrogatory #12—Plaintiffs alleged damages, per categories listed.
- Interrogatory #14—jurisdictions of Brad Byrd's civil suits.

3. On January 22, 2026, Defendant attempted in good faith to obtain Plaintiffs' full responses to the subject discovery and resolve this issue with Plaintiff without Court intervention, to no avail. *See* **Exhibit C**.

4. To date, Plaintiffs have not provided full discovery responses to Defendant and are maintaining their objections thereto.

WHEREFORE, Defendant respectfully requests this Court enter an Order granting said motion and compelling Plaintiffs to provide full answers and responses to said discovery, as well as Defendant's attorneys' fees and costs associated with this Motion.

CERTIFICATE OF CONFERRAL PRIOR TO FILING

I certify that prior to filing this motion, Defendant attempted to resolve this matter with Plaintiffs' counsel to no avail.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished to John D. "Jack" Webb, Esq., 1662 Stockton Street, Suite 201, Jacksonville, FL 32204, (Counsel for Plaintiff), jwebb@jackwebblaw.com; arichey@jackwebblaw.com, and Jupton@jackwebblaw.com, Heather L. Stover, Esq. and Richard S. Maselli, Esq., Ogden Sullivan, (Counsel or Defendant RXO), 5422 Bay Center Drive, Suite 100, Tampa, FL 33609,

hstover@ogdensullivan.com, RMaselli@ogdensullivan.com, and Eservice@ogdensullivan.com, via Florida E-Portal, this 5th day of February, 2026.

JAKAB LAW, PLLC

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