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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 RESPONSES TO PLAINTIFF'S FIRST REQUEST FOR ADMISSIONS

Defendant, Costco-Innovel Solutions, LLC, d/b/a Costco Wholesale Logistics (Costco), responds to Plaintiffs' First Request for Admissions served on Defendant with the subject Complaint and states:

1. Admitted, in part. In particular, admitted Plaintiff purchased the refrigerator, however, denied regarding delivery and installation by Costco, as Costco is defined.

2. Admitted.

3. Admitted.

4. Denied.

5. Admitted that RXO handled the delivery and installation of the refrigerator, otherwise denied, as phrased.

6. Without knowledge, therefore denied.

7. Denied.

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8. Objection, this request calls for legal conclusion. Without waiving said objection, denied.

9. Denied.

10. Objection, this request calls for legal conclusion. Without waiving said objection, denied.

11. Denied.

12. Objection, this request calls for legal conclusion. Without waiving said objection, denied.

13. Denied.

14. Objection, this request calls for legal conclusion. Without waiving said objection, denied.

15. Denied.

16. Denied.

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 15th day of January, 2026.

JAKAB LAW, PLLC

/s/ Kevin E. Jakab, Esq.
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