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[Redacted] 2)
[Redacted]
[Redacted]

Attorneys for Plaintiff, [Redacted]

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES - CENTRAL**

[Redacted]

Plaintiff,

vs.

[Redacted]

Defendants.

CASE NO. [Redacted]

signed to: [Redacted]

Complaint filed on September 27, [Redacted]

**NOTICE OF TAKING DEPOSITION OF
CUSTODIAN OF RECORDS WITH
PRODUCTION OF DOCUMENTS**

Date: [Redacted]

Time:

Location: [Redacted]

TO DEFENDANTS [Redacted],

[Redacted] AND TO THEIR ATTORNEYS OF RECORD

HEREIN:

NOTICE IS HEREBY GIVEN that Plaintiff will take the deposition of the
CUSTODIAN OF RECORDS of Defendants [Redacted]

[Redacted]

[Redacted]

1 **PLEASE TAKE FURTHER NOTICE** that pursuant to California Code of Civil
2 Procedure § 2031, Plaintiff requests the witness produce for inspection and copying at said
3 deposition the originals of the following documents:

4 (1) Each and every complete original claim files kept in connection with the
5 subject claim, No. [REDACTED] as maintained at home office, any regional office, any local
6 office or any other claims office maintaining such files, including all file contents, file
7 jackets, computer files and every e-mail.

8 (2) Each and every complete original underwriting file kept in connection with the
9 subject policy, Nos. [REDACTED] and [REDACTED] as maintained at home office, any
10 regional office, any local office or any other office maintaining such files, including all file
11 contents, file jackets, computer files and every e-mail.

12 The deposition will be taken on [REDACTED] at 1:00 p.m. at the law offices of
13 [REDACTED]
14 [REDACTED] 1.

15 Said deposition will take place before a Notary Public or Certified Court Reporter,
16 pursuant to the laws of the State of California, and will continue from day to day, excluding
17 holidays and weekends, until completed, and may be videotaped.

18 If a translator is needed, please notify Plaintiff's counsel no later than five days
19 before the date of the deposition.

20
21 Dated [REDACTED] [REDACTED]

22
23 By _____
24 William A. Daniels
25 Attorneys for Plaintiff
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1 William A. Daniels, Esq. (SBN 172 2)

2 [Redacted]
3 [Redacted]
4 [Redacted]

5 Attorneys for Plaintiff, [Redacted]

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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF LOS ANGELES - CENTRAL**

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11 [Redacted]
12 [Redacted] Plaintiff,

13 vs.

14 [Redacted]
15 [Redacted]
16 [Redacted]
17 [Redacted] Defendants.

CASE NO. [Redacted]
Case Assigned to: Hon. Ronald M. Sohigian
Dept.: "41"

Complaint filed on [Redacted]

**NOTICE OF TAKING DEPOSITION OF
PERSON MOST QUALIFIED WITH
PRODUCTION OF DOCUMENTS**

Date: [Redacted]
Time: [Redacted]
Location: [Redacted]

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21 TO DEFENDANTS [Redacted]

22 [Redacted] AND TO THEIR ATTORNEYS OF RECORD

23 HEREIN:

24 **NOTICE IS HEREBY GIVEN** that Plaintiff will take the following depositions:

25 1. The Person Most Qualified to testify regarding handling of the subject
26 claim, No. [Redacted] on **May [Redacted]** at **3:00 p.m.**

27 2. The Person Most Qualified to testify regarding underwriting of the
28 subject policy, Nos. [Redacted] and [Redacted] on **May 9, [Redacted]** at **4:00 p.m.**

1 The depositions will be taken at the law offices of [REDACTED]
2 [REDACTED]

3 Said depositions will take place before a Notary Public or Certified Court Reporter,
4 pursuant to the laws of the State of California, and will continue from day to day, excluding
5 holidays and weekends, until completed, and may be videotaped.

6 If a translator is needed, please notify Plaintiff's counsel no later than five days
7 before the date of the deposition.

8
9 **PLEASE TAKE FURTHER NOTICE** that pursuant to California Code of Civil
10 Procedure § 2031, Plaintiff requests the witnesses produce for inspection and copying at
11 said depositions the originals of the following documents:

12 (1) Each and every complete original claim files kept in connection with the
13 subject claim, No. [REDACTED] 6 , as maintained at home office, any regional office, any local
14 office or any other claims office maintaining such files, including all file contents, file
15 jackets, computer files and every e-mail.

16 (2) Each and every complete original underwriting file kept in connection with the
17 subject policy, Nos. [REDACTED] and [REDACTED] as maintained at home office, any
18 regional office, any local office or any other office maintaining such files, including all file
19 contents, file jackets, computer files and every e-mail.

20
21 Dated: [REDACTED]

[REDACTED]

22
23 By _____
24 William A. Daniels
25 Attorneys for Plaintiff
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[Redacted]

Attorneys for Plaintiff, [Redacted]

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES - CENTRAL**

[Redacted]

Plaintiff,

vs.

[Redacted]

Defendants.

CASE NO. [Redacted]

Case Assigned to: Hon. Ronald M. Sohigian
Dept.: "41"

Complaint filed on [Redacted]

REQUEST FOR ADMISSION, SET NO. ONE

PROPOUNDING PARTY: Plaintiff, [Redacted].

RESPONDING PARTIES: Defendants, [Redacted]

SET NUMBER: ONE (1)

Pursuant to Code of Civil Procedure Section 2033 demand is made upon you to
respond to the following Request for Admissions.

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[Redacted]

REQUEST FOR ADMISSION, SET NO. ONE

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DEFINITIONS

1. YOU includes [REDACTED], its employees, officers, directors, partners, attorneys, accountants, investigators, predecessors-in-interest, successors-in-interest, divisions, subsidiaries, parents, any other PERSON acting on their behalf, and each of their employees, officers, directors, partners, attorneys, accountants, investigators, adjusters, claim representatives, predecessors-in-interest, successors-in-interest, divisions, subsidiaries or parents.

REQUESTS FOR ADMISSION

Request for Admission 1:

Admit that you are relying on the advice of defense counsel in this case.

Request for Admission 2:

Admit that you have not paid [REDACTED] the full value of the contract damages to which it is entitled.

Dated: [REDACTED] [REDACTED]

By _____
William A. Daniels
Attorneys for Plaintiff

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[REDACTED]

Attorneys for Plaintiff, [REDACTED]

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES - CENTRAL**

[REDACTED]

Plaintiff,

vs.

[REDACTED]

Defendants.

CASE NO. [REDACTED]

Case Assigned to: Hon. Ronald M. Sohigian
Dept.: "41"

Complaint filed on [REDACTED]

**FIRST SET OF REQUEST FOR
PRODUCTION OF DOCUMENTS TO
DEFENDANTS**

PROPOUNDING PARTY: Plaintiff, [REDACTED]

RESPONDING PARTIES: Defendants, [REDACTED]

[REDACTED]

SET NUMBER: ONE (1)

PLEASE TAKE NOTICE that plaintiff, [REDACTED]

INC., hereby requests defendants, [REDACTED]

[REDACTED] respond to the following First Set of

[REDACTED]
FIRST SET OF REQUEST FOR PRODUCTION OF DOCUMENTS TO DEFENDANTS

1 Request for Production of Documents pursuant to Code of Civil Procedure §2031 as
2 follows:

3 Definitions:

4 a) WRITINGS shall be defined as handwriting, typewriting, printing, photostating,
5 photographing, and every other means of recording upon any tangible thing, any form of
6 communication or representation, including [but not limited to] letters, words, pictures,
7 sounds, or symbols, or combinations thereof.

8 b) The term “any other party to this action” refers to either defendant, [REDACTED]
9 [REDACTED]
10 [REDACTED] their agents, attorneys, representatives, or anyone else acting on their behalf
11 or their request.

12 **REQUEST FOR PRODUCTION OF DOCUMENTS NUMBER ONE:**

13 Each and every claims file, in its entirety, including branch, regional and home office
14 claims files pertaining to the claim for benefits submitted by or on behalf of plaintiff under
15 [REDACTED] policy numbers [REDACTED] and [REDACTED]

16 **REQUEST FOR PRODUCTION OF DOCUMENTS NUMBER TWO:**

17 Each and every underwriting file pertaining to [REDACTED] policy numbers [REDACTED]
18 and [REDACTED]

19 **REQUEST FOR PRODUCTION OF DOCUMENTS NUMBER THREE:**

20 A true and correct copy of the complete [REDACTED] “Claims Office Manual” or
21 such similar document(s) by whatever name or title used by defendants for the handling of
22 commercial fire claims for the following years:

- 23 1. 2003
- 24 2. 2004
- 25 3. 2005

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1 **REQUEST FOR PRODUCTION OF DOCUMENTS NUMBER FOUR:**

2 A true and correct copy of the complete "Training Manual" or such similar document(s) by
3 whatever name or title used by defendants for the purpose of training their employees in
4 the handling of commercial fire claims for the following years:

- 5 a. 2003
- 6 b. 2004
- 7 c. 2005

8 **REQUEST FOR PRODUCTION OF DOCUMENTS NUMBER FIVE:**

9 True and correct copies of any and all claim bulletins, internal memoranda, letters,
10 notices, or similar documents sent by management to the claims staff at either defendant

11 [REDACTED]

12 [REDACTED] relating to the handling of commercial fire claims for the following years:

- 13 a. 2003
- 14 b. 2004
- 15 c. 2005

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17 Dated: [REDACTED] [REDACTED]

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19 By _____

20 William A. Daniels
Attorneys for Plaintiff

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[REDACTED]

Attorneys for Plaintiff, [REDACTED]

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES - CENTRAL**

[REDACTED],
[REDACTED],

Plaintiff,

vs.

[REDACTED]
[REDACTED]
[REDACTED]

Defendants.

CASE [REDACTED]

Case Assigned to: Hon. Ronald M. Sohigian
Dept.: "41"

Complaint filed on [REDACTED]

[REDACTED] **OF INTERROGATORIES TO
DEFENDANTS**

PROPOUNDING PARTY: Plaintiff, [REDACTED].

RESPONDING PARTIES: Defendants, [REDACTED]

[REDACTED]

SET NUMBER: ONE (1)

PLEASE TAKE NOTICE that plaintiff, [REDACTED]

[REDACTED], hereby requests defendants, [REDACTED]

FIRST SET OF INTERROGATORIES TO [REDACTED] DEFENDANTS

1 [REDACTED] respond to the following First Set of
2 Interrogatories pursuant to Code of Civil Procedure §2030 as follows:

3 **INTERROGATORIES**

4
5 **INTERROGATORY NUMBER ONE:**

6 Please provide the name, address, phone number and job title of each agent or
7 employee of defendants [REDACTED]

8 [REDACTED] who were involved in the investigation, handling,
9 adjustment, supervision or management of the plaintiff's claim for fire insurance benefit
10 payments arising out of the policies identified in plaintiff's Complaint herein.

11
12 Dated: [REDACTED] [REDACTED]

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14 By _____
15 William A. Daniels
16 Attorneys for Plaintiff
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