



Diana Ungerleider <dianaunger3@gmail.com>

RE: David Schultz <DSchultz@Polsinelli.com>

5 messages

Burkholder, Donn M <dburkholder@chubb.com>

Tue, Apr 5, 2016 at 9:14 AM

To: David Schultz <DSchultz@polsinelli.com>, "Iserota@kuluva.com" <Iserota@kuluva.com>

Cc: "Clay Robbins (clayrobbinsiii@yahoo.com)" <clayrobbinsiii@yahoo.com>, Francine Kirkpatrick

<DrFKirk@verizon.net>, "Miriam Schulman (miriamschulman@hotmail.com)" <miriamschulman@hotmail.com>,

"Diana Ungerleider (dianaunger3@gmail.com)" <dianaunger3@gmail.com>, roger broderick <chaselaw@me.com>,

"Howard Weisberg (hlweisberg0@gmail.com)" <hlweisberg0@gmail.com>, Suzanne Weisberg <sjw@sjwlegal.com>

Mr. Schultz:

We may continue to explore settlement potential.

I understand the plaintiffs' counsel intends to seek a continuance of the trial date, which is no assurance that will happen. I personally believe the plaintiffs' are currently unprepared to try the case.

Regards, Donn

CHUBB®**Donn M. Burkholder**

D&O Examiner, North American Financial Lines Claims

555 South Flower Street, 4th Floor, Los Angeles, California 90071-2300, USA

O (213) 833-5218

E dburkholder@chubb.com

ACE and Chubb are now one.

From: David Schultz [mailto:DSchultz@Polsinelli.com]**Sent:** Monday, April 04, 2016 4:33 PM**To:** Burkholder, Donn M <dburkholder@chubb.com>; Iserota@kuluva.com**Cc:** Clay Robbins (clayrobbinsiii@yahoo.com) <clayrobbinsiii@yahoo.com>; Francine Kirkpatrick

<DrFKirk@verizon.net>; Miriam Schulman (miriamschulman@hotmail.com)

<miriamschulman@hotmail.com>; Diana Ungerleider (dianaunger3@gmail.com)

<dianaunger3@gmail.com>; roger broderick <chaselaw@me.com>; Howard Weisberg

(hlweisberg0@gmail.com) <hlweisberg0@gmail.com>; Suzanne Weisberg <sjw@sjwlegal.com>

Subject: David Schultz <DSchultz@Polsinelli.com>

Thank you for that update. Are there any subsequent mediation/settlement efforts planned? W

We have never received a written response from Lori to advise of the litigation related issues that we raised, including the most pressing issues regarding whether she will be seeking to continue the trial date and what steps have been taken to limit or defend against the claimed damages. Respectfully, a detailed report and action plan should have been provided by Lori and you well before the mediation. And, now, in light of what has transpired, the need for that is even more important.

From: Burkholder, Donn M [<mailto:dburkholder@chubb.com>]
Sent: Monday, April 04, 2016 9:28 AM
To: David Schultz; lserota@kuluva.com
Cc: Clay Robbins (clayrobbinsiii@yahoo.com); Francine Kirkpatrick; Miriam Schulman (miriamschulman@hotmail.com); Diana Ungerleider (dianaunger3@gmail.com); roger broderick; Howard Weisberg (hlweisberg0@gmail.com); Suzanne Weisberg
Subject: RE: Palisair Home Owners Association

Palisair Home Owners Association

Claim No. 326413

Thanks Mr. Schultz – Mr. Robbins indicated he'd try to reach you last Thursday

The plaintiffs opened the mediation with a \$1,350,000 settlement demand. After several exchanges with the mediator, late in the afternoon the plaintiffs' settlement demand was for \$750,000, to which we responded with a \$100,000 settlement offer. The plaintiffs didn't respond, and the mediator adjourned the mediation on the belief it would not resolve that day.

Regards, Donn

CHUBB®

Donn M. Burkholder

D&O Examiner, North American Financial Lines Claims

555 South Flower Street, 4th Floor, Los Angeles, California 90071-2300, USA

O (213) 833-5218

E dburkholder@chubb.com

ACE and Chubb are now one.

From: David Schultz [<mailto:DSchultz@Polsinelli.com>]
Sent: Saturday, April 02, 2016 6:29 AM
To: Burkholder, Donn M <dburkholder@chubb.com>; lserota@kuluva.com
Cc: Clay Robbins (clayrobbinsiii@yahoo.com) <clayrobbinsiii@yahoo.com>; Francine Kirkpatrick <DrFKirk@verizon.net>; Miriam Schulman (miriamschulman@hotmail.com) <miriamschulman@hotmail.com>; Diana Ungerleider (dianaunger3@gmail.com) <dianaunger3@gmail.com>; roger broderick <chaselaw@me.com>; Howard Weisberg (hlweisberg0@gmail.com) <hlweisberg0@gmail.com>; Suzanne Weisberg <sjw@sjwlegal.com>
Subject: Re: Palisair Home Owners Association

Donn- we never received any email updates from you. Please do that on Monday. Thank you.

Sent from my iPhone

On Mar 30, 2016, at 9:43 AM, "David Schultz" <DSchultz@Polsinelli.com> wrote:

At this point, emails from you to the group would be the most expedient way to disseminate information.

From: Burkholder, Donn M [<mailto:dburkholder@chubb.com>]
Sent: Wednesday, March 30, 2016 9:42 AM
To: David Schultz; lserota@kuluva.com
Cc: Clay Robbins (clayrobbinsiii@yahoo.com); Francine Kirkpatrick; Miriam Schulman (miriamschulman@hotmail.com); Diana Ungerleider (dianaunger3@gmail.com); roger broderick; Howard Weisberg (hlweisberg0@gmail.com); Suzanne Weisberg
Subject: RE: Palisair Home Owners Association

Thanks Mr. Schultz – if you'll provide me with a cell number I can send you text messages – otherwise, I'll periodically send you e-mails throughout the day

CHUBB[®]

Donn M. Burkholder

D&O Examiner, North American Financial Lines Claims

555 South Flower Street, 4th Floor, Los Angeles, California 90071-2300, USA

O (213) 833-5218

E dburkholder@chubb.com

ACE and Chubb are now one.

From: David Schultz [<mailto:DSchultz@Polsinelli.com>]
Sent: Wednesday, March 30, 2016 9:34 AM
To: Burkholder, Donn M <dburkholder@chubb.com>; lserota@kuluva.com
Cc: Clay Robbins (clayrobbinsiii@yahoo.com) <clayrobbinsiii@yahoo.com>; Francine Kirkpatrick <DrFKirk@verizon.net>; Miriam Schulman (miriamschulman@hotmail.com) <miriamschulman@hotmail.com>; Diana Ungerleider (dianaunger3@gmail.com) <dianaunger3@gmail.com>; roger broderick <chaselaw@me.com>; Howard Weisberg (hlweisberg0@gmail.com) <hlweisberg0@gmail.com>; Suzanne Weisberg <sjw@sjwlegal.com>
Subject: RE: Palisair Home Owners Association

By the way, I also tried to call the number that was provided in Donn's email for Lori, (714) 913-4816. But that was a fax number that just gave a loud beep and was obviously not accurate.

From: David Schultz
Sent: Wednesday, March 30, 2016 9:29 AM
To: 'dburkholder@chubb.com'; 'lserota@kuluva.com'
Cc: Clay Robbins (clayrobbinsiii@yahoo.com); 'Francine Kirkpatrick'; Miriam Schulman (miriamschulman@hotmail.com); Diana Ungerleider (dianaunger3@gmail.com); 'roger broderick'; Howard Weisberg (hlweisberg0@gmail.com); Suzanne Weisberg
Subject: RE: Palisair Home Owners Association
Importance: High

Donn and Lori—I am one of the current board members of the Palisair HOA, your insured and client. I understand from our cumis counsel, Mr. Clay Robbins, that you are having a mediation concerning the Del Colliano matter today at 10:00 a.m. I don't believe that the Palisair HOA board was ever provided advance notice of the date, time and location of this mediation—which is why inquiries were recently made about whether a mediation was being set up. Because the Palisair HOA board is finding out about this mediation at this late time, no one is available and can possibly attend now. Thus, we expect that you will be providing us with updates throughout and after the mediation, as well as serving to protecting our interests under the policy with regard to this and other pending claims. I am copying the other members of the board, for your ease of reference in communicating with them. .

Thank you.

David Schultz

From: "Burkholder, Donn M" <dburkholder@chubb.com>
Date: Monday, March 28, 2016 at 4:04 PM
To: Clay Robbins <clayrobbinsiii@yahoo.com>
Cc: ">" <drfkirk@verizon.net>, "Iserota@kuluva.com" <Iserota@kuluva.com>
Subject: RE: Palisair Home Owners Association

Thanks I can make myself available tomorrow between 10:30 AM & 3:30 PM

CHUBB

Donn M. Burkholder

D&O Examiner, North American Financial Lines Claims

555 South Flower Street, 4th Floor, Los Angeles, California 90071-2300, USA
O (213) 833-5218
E dburkholder@chubb.com

ACE and Chubb are now one.

From: Clay Robbins [<mailto:clayrobbinsiii@yahoo.com>]
Sent: Monday, March 28, 2016 3:54 PM
To: Burkholder, Donn M <dburkholder@chubb.com>
Cc: Francine Kirkpatrick <DrFKirk@verizon.net>; Iserota@kuluva.com
Subject: Re: Palisair Home Owners Association

Donn

I need all reports to the insurer about status, discovery, liability and exposure. I need an explanation as to why the trial date was not continued when the complaint was amended to include what you assert are non-covered claims. Discovery has now closed, I assume and experts have been designated. Why would you issue a reservation at this late date under those circumstances? Do you not think your insured's interests have been prejudiced by your decision under the circumstances? What discovery has taken place on the bodily injury/emotional distress claims? Who are the experts? What did you reserve on this claim? Has that criterion changed at all from the beginning and why? I do not know Ms. Serota, but I have worked a case with Mr. Armijo. I would suggest that he and/or one of his partners get involved in this immediately.

I do not know what you mean by "reimbursed" the insured defense costs. Is not the Kuluva firm house counsel for Chubb? Has the insured paid any costs for defense and if so, why?

Where are the parties insofar as demand and offer?

Our hourly rate is \$625.00 per hour.

We need to have a meeting as soon as possible with your claims manager and trial counsel on this case in person or over the phone before the mediation.

Let me know their availability and I will check it with mine.

Yours Truly

CLAY ROBBINS III, ESQ. MAGAÑA, CATHCART & McCARTHY 1900 Avenue of the Stars, Suite 650 Los Angeles, CA 90067 310 553-6630

From: "Burkholder, Donn M" <dburkholder@chubb.com>
To: "clayrobbinsiii@yahoo.com" <clayrobbinsiii@yahoo.com>
Cc: Francine Kirkpatrick <DrFKirk@verizon.net>; "lserota@kuluva.com" <lserota@kuluva.com>
Sent: Monday, March 28, 2016 11:46 AM
Subject: Palisair Home Owners Association

Insured: Palisair Home Owners Association
Policy No.: 8227-6754
Claim No.: 326413
Plaintiffs: Gerard Del Colliano, *et ux.*
Company: Federal Insurance Company

Mr. Robbins:

This follows my voice mail message.

Palisair Home Owners Association has requested Federal Insurance Company's consent to their retaining you as *Cumis* counsel on their behalf. Federal can conditionally consent to that arrangement. Please let me know your proposed hourly billing rate for this matter.

A private mediation is currently scheduled for March 30, 2016 here in Los Angeles. I've copied Palisair's defense counsel, Lori Serota, at Kuluva Armijo & Garcia on this e-mail. Lori can be reached at (714) 913-4816.

Please let me know what information you would like me to send to you.

The Policy carries a \$1,000,000 limit of liability, each **Claim**, each **Policy Year**. Pursuant to Endorsement No. 1, **Defense Costs** are outside of, and are not part of, the limit of liability. To date, Federal has reimbursed the Insured \$117,871.342 for its defense fees and costs incurred in defending this matter.

Let me know if you care to discuss.

Regards, Donn

CHUBB

Donn M. Burkholder

D&O Examiner, North American Financial Lines Claims

555 South Flower Street, 4th Floor, Los Angeles, California 90071-2300, USA

O (213) 833-5218

E dburkholder@chubb.com

ACE and Chubb are now one.

This email (including any attachments) is intended for the designated recipient(s) only, and may be confidential, non-public, proprietary, and/or protected by the attorney-client or other privilege. Unauthorized reading, distribution, copying or other use of this communication is prohibited and may be unlawful. Receipt by anyone other than the intended recipient(s) should not be deemed a waiver of any privilege or protection. If you are not the intended recipient or if you believe that you have received this email in error, please notify the sender immediately and delete all copies from your computer system without reading, saving, printing or using it in any manner. Although it has been checked for viruses and other malicious software ("malware"), we do not warrant, represent or guarantee in any way that this communication is free of malware or potentially damaging defects. All liability for any actual or alleged loss, damage, or injury arising out of or resulting in any way from the receipt, opening or use of this email is expressly disclaimed.

This email (including any attachments) is intended for the designated recipient(s) only, and may be confidential, non-public, proprietary, and/or protected by the attorney-client or other privilege. Unauthorized reading, distribution, copying or other use of this communication is prohibited and may be unlawful. Receipt by anyone other than the intended recipient(s) should not be deemed a waiver of any privilege or protection. If you are not the intended recipient or if you believe that you have received this email in error, please notify the sender immediately and delete all copies from your computer system without reading, saving, printing or using it in any manner. Although it has

been checked for viruses and other malicious software ("malware"), we do not warrant, represent or guarantee in any way that this communication is free of malware or potentially damaging defects. All liability for any actual or alleged loss, damage, or injury arising out of or resulting in any way from the receipt, opening or use of this email is expressly disclaimed.

This electronic mail message contains CONFIDENTIAL information which is (a) ATTORNEY - CLIENT PRIVILEGED COMMUNICATION, WORK PRODUCT, PROPRIETARY IN NATURE, OR OTHERWISE PROTECTED BY LAW FROM DISCLOSURE, and (b) intended only for the use of the Addressee(s) named herein. If you are not an Addressee, or the person responsible for delivering this to an Addressee, you are hereby notified that reading, copying, or distributing this message is prohibited. If you have received this electronic mail message in error, please reply to the sender and take the steps necessary to delete the message completely from your computer system.

This email (including any attachments) is intended for the designated recipient(s) only, and may be confidential, non-public, proprietary, and/or protected by the attorney-client or other privilege. Unauthorized reading, distribution, copying or other use of this communication is prohibited and may be unlawful. Receipt by anyone other than the intended recipient(s) should not be deemed a waiver of any privilege or protection. If you are not the intended recipient or if you believe that you have received this email in error, please notify the sender immediately and delete all copies from your computer system without reading, saving, printing or using it in any manner. Although it has been checked for viruses and other malicious software ("malware"), we do not warrant, represent or guarantee in any way that this communication is free of malware or potentially damaging defects. All liability for any actual or alleged loss, damage, or injury arising out of or resulting in any way from the receipt, opening or use of this email is expressly disclaimed.

This electronic mail message contains CONFIDENTIAL information which is (a) ATTORNEY - CLIENT PRIVILEGED COMMUNICATION, WORK PRODUCT, PROPRIETARY IN NATURE, OR OTHERWISE PROTECTED BY LAW FROM DISCLOSURE, and (b) intended only for the use of the Addressee(s) named herein. If you are not an Addressee, or the person responsible for delivering this to an Addressee, you are hereby notified that reading, copying, or distributing this message is prohibited. If you have received this electronic mail message in error, please reply to the sender and take the steps necessary to delete the message completely from your computer system.

This email (including any attachments) is intended for the designated recipient(s) only, and may be confidential, non-public, proprietary, and/or protected by the attorney-client or other privilege. Unauthorized reading, distribution, copying or other use of this communication is prohibited and may be unlawful. Receipt by anyone other than the intended recipient(s) should not be deemed a waiver of any privilege or protection. If you are not the intended recipient or if you believe that you have received this email in error, please notify the sender immediately and delete all copies from your computer system without reading, saving, printing or using it in any manner. Although it has been checked for viruses and other malicious software ("malware"), we do not warrant, represent or guarantee in any way that this communication is free of malware or potentially damaging defects. All liability for any actual or alleged loss, damage, or injury arising out of or resulting in any way from the

receipt, opening or use of this email is expressly disclaimed.

This electronic mail message contains CONFIDENTIAL information which is (a) ATTORNEY - CLIENT PRIVILEGED COMMUNICATION, WORK PRODUCT, PROPRIETARY IN NATURE, OR OTHERWISE PROTECTED BY LAW FROM DISCLOSURE, and (b) intended only for the use of the Addressee(s) named herein. If you are not an Addressee, or the person responsible for delivering this to an Addressee, you are hereby notified that reading, copying, or distributing this message is prohibited. If you have received this electronic mail message in error, please reply to the sender and take the steps necessary to delete the message completely from your computer system.

This email (including any attachments) is intended for the designated recipient(s) only, and may be confidential, non-public, proprietary, and/or protected by the attorney-client or other privilege. Unauthorized reading, distribution, copying or other use of this communication is prohibited and may be unlawful. Receipt by anyone other than the intended recipient(s) should not be deemed a waiver of any privilege or protection. If you are not the intended recipient or if you believe that you have received this email in error, please notify the sender immediately and delete all copies from your computer system without reading, saving, printing or using it in any manner. Although it has been checked for viruses and other malicious software ("malware"), we do not warrant, represent or guarantee in any way that this communication is free of malware or potentially damaging defects. All liability for any actual or alleged loss, damage, or injury arising out of or resulting in any way from the receipt, opening or use of this email is expressly disclaimed.

David Schultz <DSchultz@polsinelli.com>

Tue, Apr 5, 2016 at 9:59 AM

To: "Burkholder, Donn M" <dburkholder@chubb.com>

Cc: "Iserota@kuluva.com" <Iserota@kuluva.com>, "Clay Robbins (clayrobbsiii@yahoo.com)" <clayrobbsiii@yahoo.com>, Francine Kirkpatrick <DrFKirk@verizon.net>, "Miriam Schulman (miriamschulman@hotmail.com)" <miriamschulman@hotmail.com>, "Diana Ungerleider (dianaunger3@gmail.com)" <dianaunger3@gmail.com>, roger broderick <chaselaw@me.com>, "Howard Weisberg (hlweisberg0@gmail.com)" <hlweisberg0@gmail.com>, Suzanne Weisberg <sjw@sjwlegal.com>

Thank you. But many questions remain unanswered. For instance, have Plaintiffs designated the appropriate experts to pursue their liability and damage claims against the HOA? If not, are you intending to ask the court to keep discovery closed even if trial date is continued? Again, what efforts have been undertaken by you and Lori to preclude or limit the claims. These are among the questions that we should be apprised about but frankly have not revived any meaningful response that advises on the liability and damage issues. A detailed report has been requested and should be provided.

Sent from my iPhone

[Quoted text hidden]

Burkholder, Donn M <dburkholder@chubb.com>

Tue, Apr 5, 2016 at 11:29 AM

To: David Schultz <DSchultz@polsinelli.com>

Cc: "Iserota@kuluva.com" <Iserota@kuluva.com>, "Clay Robbins (clayrobbsiii@yahoo.com)" <clayrobbsiii@yahoo.com>, Francine Kirkpatrick <DrFKirk@verizon.net>, "Miriam Schulman (miriamschulman@hotmail.com)" <miriamschulman@hotmail.com>, "Diana Ungerleider (dianaunger3@gmail.com)" <dianaunger3@gmail.com>, roger broderick <chaselaw@me.com>, "Howard Weisberg (hlweisberg0@gmail.com)" <hlweisberg0@gmail.com>, Suzanne Weisberg <sjw@sjwlegal.com>

Mr. Shultz – I'll ask that Lori &/or Clay respond to your legal questions.

CHUBB**Donn M. Burkholder**

D&O Examiner, North American Financial Lines Claims

555 South Flower Street, 4th Floor, Los Angeles, California 90071-2300, USA

O (213) 833-5218

E dburkholder@chubb.com

ACE and Chubb are now one.

From: David Schultz [mailto:DSchultz@Polsinelli.com]**Sent:** Tuesday, April 05, 2016 10:00 AM**To:** Burkholder, Donn M <dburkholder@chubb.com>**Cc:** Iserota@kuluva.com; Clay Robbins (clayrobbinsiii@yahoo.com) <clayrobbinsiii@yahoo.com>;

Francine Kirkpatrick <DrFKirk@verizon.net>; Miriam Schulman (miriamschulman@hotmail.com)

<miriamschulman@hotmail.com>; Diana Ungerleider (dianaunger3@gmail.com)

<dianaunger3@gmail.com>; roger broderick <chaselaw@me.com>; Howard Weisberg

(hlweisberg0@gmail.com) <hlweisberg0@gmail.com>; Suzanne Weisberg <sjw@sjwlegal.com>

Subject: Re: David Schultz <DSchultz@Polsinelli.com>

[Quoted text hidden]

[Quoted text hidden]

Clay Robbins <clayrobbinsiii@yahoo.com>

Tue, Apr 5, 2016 at 5:18 PM

Reply-To: Clay Robbins <clayrobbinsiii@yahoo.com>

To: "Burkholder, Donn M" <dburkholder@chubb.com>, David Schultz <DSchultz@polsinelli.com>

Cc: "Iserota@kuluva.com" <Iserota@kuluva.com>, Francine Kirkpatrick <DrFKirk@verizon.net>, "Miriam Schulman

(miriamschulman@hotmail.com)" <miriamschulman@hotmail.com>, "Diana Ungerleider (dianaunger3@gmail.com)"

<dianaunger3@gmail.com>, roger broderick <chaselaw@me.com>, "Howard Weisberg (hlweisberg0@gmail.com)"

<hlweisberg0@gmail.com>, Suzanne Weisberg <sjw@sjwlegal.com>

All

I tried to reach out to Mr. Huber today, in an effort to reintroduce myself. There was no answer, so I left a message asking him to call me. I plan to explain for him what I perceive to be the potential coverage issues framed by his claims and lay out for him how that impacts issues like the likelihood of collecting, even if he is so fortunate as to secure a favorable judgment. My hope is to guide him toward a more reasonable demand, though I believe he may have very little control over that issue.

I understand efforts are underway to secure a continuance. We cannot be at all certain any such request will be granted.

As to future preparation, during the mediation I shared with our side my thoughts that it would be vital for our liability expert on HOA standards to review all the variances that had been granted over the course of the five years prior to this application in order to substantiate a position that there were significant differences in those past requests that were not in play with this one (hopefully those past did not involve a negative impact on adjacent property value).

During my preparation of this e-mail, Mr. Huber returned my call.

I explained my position as Cumis counsel and described the potential coverage problem.

This apparently came as news to him. I told him that I would like to facilitate settlement, but that the demand was impeding my ability to do that.

Terry then launched into a half hour discussion of the liability issues and his factual recitation to support his position. I pointed out that his client purchased the property knowing of the restrictions, that he had counsel throughout the variance efforts, that he was looking for the variance to make the change within the next 20 years - so how was his guy harmed by a slight delay in processing? I also reminded him about the business judgment rule. He responded that there is no consistency in the design in the neighborhood and so the refusal to grant a variance was unjustified (hence the importance of having our standards guy review past variance requests).

I replied that even if you assumed there was merit to his argument (which I would not concede), if he got a big judgment, how would he collect if there was this coverage issue-- did he want to take on and fund a post judgement Bad Faith case?

I told him he needed to bring his demand below \$500K if we were to avoid a trial. I also asked whether his client realized that it would cost upwards of \$150K to try this case over and above what he has already paid, not including attorney fees.

He said he would contact his client for authority to make a \$500K demand. I told him that wouldn't do it, he had to be substantially below \$500K.

He will get back to me tomorrow, and I will report to all. He is going down on an ex parte application to continue the trial and FSC dates. As this is the second continuance there is no guarantee this request will be granted. I told him to advise the court that a coverage dispute has arisen in light of the recent amendment that has brought in Cumis counsel. Maybe that will work.

I will advise as matters progress.

Clay

CLAY ROBBINS III, ESQ. MAGAÑA, CATHCART & McCARTHY 1900 Avenue of the Stars,
Suite 650 Los Angeles, CA 90067 310 553-6630

From: "Burkholder, Donn M" <dburkholder@chubb.com>

To: David Schultz <DSchultz@Polsinelli.com>

Cc: "Iserota@kuluva.com" <Iserota@kuluva.com>; "Clay Robbins (clayrobbinsiii@yahoo.com)" <clayrobbinsiii@yahoo.com>; Francine Kirkpatrick <DrFKirk@verizon.net>; "Miriam Schulman (miriamschulman@hotmail.com)" <miriamschulman@hotmail.com>; "Diana Ungerleider (dianaunger3@gmail.com)" <dianaunger3@gmail.com>; roger broderick <chaselaw@me.com>; "Howard Weisberg (hlweisberg0@gmail.com)" <hlweisberg0@gmail.com>; Suzanne Weisberg <sjw@sjwlegal.com>

Sent: Tuesday, April 5, 2016 11:29 AM

Subject: RE: David Schultz <DSchultz@Polsinelli.com>

[Quoted text hidden]

David Schultz <DSchultz@polsinelli.com>

Tue, Apr 5, 2016 at 6:18 PM

To: "Burkholder, Donn M" <dburkholder@chubb.com>

Cc: "Iserota@kuluva.com" <Iserota@kuluva.com>, "Clay Robbins (clayrobbinsiii@yahoo.com)" <clayrobbinsiii@yahoo.com>, Francine Kirkpatrick <DrFKirk@verizon.net>, "Miriam Schulman

(miriamschulman@hotmail.com)" <miriamschulman@hotmail.com>, "Diana Ungerleider (dianaunger3@gmail.com)" <dianaunger3@gmail.com>, roger broderick <chaselaw@me.com>, "Howard Weisberg (hlweisberg0@gmail.com)" <hlweisberg0@gmail.com>, Suzanne Weisberg <sjw@sjwlegal.com>

Thank you. Lori, as I understand that you have been defending the case from the beginning, a detailed report from you should be provided first.

Sent from my iPhone

[Quoted text hidden]