

# MERLIN

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August 31, 2017

**VIA ELECTRONIC EMAIL: [david.maurstad@fema.dhs.gov](mailto:david.maurstad@fema.dhs.gov)**

David I. Maurstad  
Assistant Administrator for Federal Insurance  
Federal Insurance and Mitigation Administration  
Federal Emergency Management Agency  
U.S. Department of Homeland Security  
500 C Street S.W.  
Washington, D.C. 20472

**Re: Extension of the Deadline for Sending Proofs of Loss for Claims Related to Hurricane Harvey**

Dear Mr. Maurstad:

Please find enclosed our letter to Administrator Brock Long and Deputy Associate Administrator Roy Wright requesting an extension of the Hurricane Harvey sworn Proofs of Loss deadline until January 1, 2019.

I applaud your recent August 28, 2017, extension of the Proofs of Loss requirement related to the floods commencing on August 9, 2016 through August 31, 2016. We note that this was the fifth extension of the deadline for filing Proofs of Loss for those storms and floods. It has been my observation that administrators have been routinely granting numerous extensions following major hurricanes with flood events. These extensions are wisely given and welcome by national flood policyholders because they allow for recoveries of insurance benefits which would otherwise be forfeited merely because of a time lapse.

Hurricane Harvey will undoubtedly give rise to the need for an extension of the current 60-day deadline for submittal of the Proofs of Loss. Like other major storm events, we predict that the Hurricane Harvey extensions will eventually be far greater than a year. We suggest that rather than granting numerous extensions and in anticipation that flood waters in some areas may not recede for several weeks and possibly months, that you grant an initial extension until January 1, 2019.

Policyholders suffering from Hurricane Harvey floods will undoubtedly be repairing damage for much longer than a year. Final billings and supplements to claims are going to be numerous and be for a period that all of us with experience with flood claims know will take possibly years to complete. Accordingly, to help reduce the stress of remembering numerous deadlines created by numerous extensions or dates tied to when a flood may start or end, we suggest one easy date everybody can remember, New Year's Day 2019.

Thank you for your attention to this matter and please consider this request for an initial extension of Proofs of Loss for claims related to Hurricane Harvey until January 1, 2019.

**MERLIN LAW GROUP, P.A.**

Very truly yours,

*/s/ William F. Merlin, Jr.*

William F. Merlin, Jr., Esq.

cc: Administrator Brock Long- *via email*- (William.long@fema.dhs.gov;  
brock.long@fema.dhs.gov)  
Deputy Associate Administrator Roy E. Wright- *via email* - (roy.wright@fema.dhs.gov)  
Lloyd "Tony" Hake, Federal Insurance and Mitigation Administration- *via email*-  
(Lloyd.Hake@fema.dhs.gov)

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August 30, 2017

**Via Electronic Mail**

Administrator Brock Long  
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[William.long@fema.dhs.gov](mailto:William.long@fema.dhs.gov)  
[Brock.long@fema.dhs.gov](mailto:Brock.long@fema.dhs.gov)

Roy E. Wright  
Deputy Associate Administrator  
Federal Insurance and Mitigation Administration  
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U.S. Department of Homeland Security  
500 C Street S.W.  
Washington, D.C. 20472  
[Roy.wright@fema.dhs.gov](mailto:Roy.wright@fema.dhs.gov)

Re: Hurricane Harvey Plea & Request

Dear Messrs. Long and Wright:

My father was a former Coast Guard Admiral for the United States Coast Guard and I grew up along our Country's coastline. I have seen the devastation and the destructive force hurricanes and floods have done to our communities.

I am writing on behalf of friends and loved ones following the Hurricane Harvey catastrophe. The purpose of this letter is to reduce and eliminate the emotional shock and the mental anticipation that something worse is about to happen following something that is indescribable which has already occurred.

Through my father's stories of rescue, stories of others who have worked with him, and through my own experiences, I have seen that leaders can have a significant impact upon the lives of others by not only saying words that they understand but through their actions. True leaders can empathize with their communities.

I am asking you to consider our brothers and sisters in Louisiana and Texas, who are currently experiencing disasters of nature that few of us have ever undergone. Please provide them an exception to the laws to help alleviate the emotional concerns as well as the practical concerns that everyone is experiencing now.

As such, I would strongly suggest that the federal government show solidarity with those in Louisiana and Texas, as well as those elsewhere that may suffer from the storm, by providing an extension of the current deadlines to file flood proofs of loss and other technical requirement forms until January 1, 2019.

Unfortunately, I have been involved with many disasters since 1982. I have seen and come to appreciate how there is additional stress added to those who have been faced with immediate deadlines regarding paperwork rather than taking the time to understand the true circumstances following the catastrophe.

I pray that the current administration, you, and others in government, will consider the plight of individual Americans from their homes and make accommodations of law which reflect the desire of those in power to provide good will and practical concerns to our citizens. The obligatory deadline to file the proofs of loss should be waived in a gesture of our government to appreciate the current situation and what many citizens are experiencing at this moment. I am hopeful that you will consider this request and help those that need it most. Please consider this request immediately for an initial extension of proofs of loss until January 1, 2019.

**MERLIN LAW GROUP, P.A.**

Very truly yours,

/s/ William F. Merlin, Jr.  
William F. Merlin, Jr., Esq.

WFMJr./ik

Cc: The Executive Office of the President of the United States