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CIVIL DISTRICT COURT
PARISH OF ORLEANS
STATE OF LOUISIANA

NO. 2020-02558 DIVISION "M" SECTION 13

CAJUN CONTI LLC, CAJUN CUISINE I LLC,
and CAJUN CUISINE LLC d/b/a/ OCEANA GRILL
VERSUS
CERTAIN UNDERWRITERS AT LLOYD'S, LONDON

VOLUME I

1442 Zoom Deposition of CERTAIN
UNDERWRITERS AT LLOYD'S, LONDON, through its
Representative, GREGORY DONOIAN, taken on
Monday, November 9, 2020, commencing at 3:05
p.m.

3

1 APPEARANCES:
2
3 Representing the Plaintiffs:
4 ALVENDIA KELLY & DEMAREST, LLC
5 Attorneys at Law
6 909 Poydras Street, Suite 1625
7 New Orleans, Louisiana 70112
8 BY: RODERICK "RICO" ALVENDIA, ESQ.
9 JENNIFER L KUECHMANN, ESQ.

10 AND
11

12 GAUTHIER MURPHY & HOUGHTALING, LLC
13 Attorneys at Law
14 3500 N. Hullen Street
15 Metairie, Louisiana 70002
16 BY: JOHN W. HOUGHTALING, ESQ.
17 JENNIFER PEREZ, ESQ.

18 Representing the Defendant:
19 PHELPS DUNBAR, LLP
20 Attorneys at Law
21 400 Convention Street, Suite 1100
22 Baton Rouge, Louisiana 70802

23 BY: VIRGINIA Y. DODD, ESQ.
24 ALLEN C. MILLER, SR., ESQ.

25 ALSO PRESENT: Charles Miller
 Ethan Gow

 Reported by:
 KAY E. DONNELLY
 Certified Court Reporter
 State of Louisiana

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1 S T I P U L A T I O N
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3 It is stipulated and agreed by and among
4 counsel that the 1442 Zoom Deposition of CERTAIN
5 UNDERWRITERS AT LLOYD'S, LONDON, through its
6 Representative, GREGORY DONOIAN, is hereby being
7 taken under the Louisiana Code of Civil
8 Procedure in accordance with the Code.

9 The formalities of sealing and
10 certification are hereby waived. The witness
11 reserves the right to read and sign the
12 deposition. The party responsible for service
13 of the discovery material shall retain the
14 original.

15 All objections, save those as to the form
16 of the questions, are hereby reserved until such
17 time as this deposition, or any part thereof,
18 may be used or sought to be used in evidence,
19 and are to be made in accordance with the Code
20 of Civil Procedure.

21 * * * * *

22 KAY E. DONNELLY, Certified Court Reporter,
23 in and for the State of Louisiana, officiated in
24 administering the oath to the witness.
25

5

1 GREGORY DONOIAN, North American Risk
 2 Services, Inc., P.O. Box 166002, Altamonte
 3 Springs, Florida 32716-6002, after having been
 4 first duly sworn, testified on his oath as
 5 follows:
 6 MR. MILLER:
 7 Hey, John, before you all begin can
 8 we -- I just want to confirm that we are
 9 reserving all objections save those as to form
 10 for trial.
 11 MR. HOUGHTALING:
 12 Yes.
 13 MR. MILLER:
 14 All right.
 15 EXAMINATION BY MR. HOUGHTALING:
 16 Q. This is John Houghtaling on behalf of
 17 Oceana, the Plaintiff.
 18 This is a deposition of Certain
 19 Underwriters at Lloyd's, London, subscribing to
 20 Policy No. AVS011221002, designated by Certain
 21 Underwriters at Lloyd's, London pursuant to
 22 Article 1442 of the Louisiana Code of Civil
 23 Procedure.
 24 So, Mr. Donoian, hello. Am I
 25 pronouncing it correct? Donoian?

6

1 A. Correct.
 2 Q. All right. Mine is pronounced
 3 Houghtaling. It is a -- so I probably get it
 4 mispronounced more than you.
 5 A. Okay.
 6 Q. So, Mr. Donoian, what is your address?
 7 A. I work for North American Risk Insurance
 8 Services out of Altamonte Springs, Florida.
 9 Q. So you don't work directly for these
 10 Certain Underwriters at Lloyd's?
 11 A. We are a third-party administrator.
 12 Q. So you don't work directly for Lloyd's,
 13 correct?
 14 A. No, I do not.
 15 Q. You are a third-party contractor,
 16 correct?
 17 A. Correct.
 18 Q. And is it your understanding that
 19 Lloyd's has presented you here today to give
 20 testimony as actually Lloyd's, even though you
 21 are a third-party administrator?
 22 MR. MILLER:
 23 Object to the form of the question.
 24 EXAMINATION BY MR. HOUGHTALING:
 25 Q. Do you understand you are speaking as

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1 Lloyd's?
 2 MR. MILLER:
 3 Same objection.
 4 THE WITNESS:
 5 I'm sorry. What?
 6 EXAMINATION BY MR. HOUGHTALING:
 7 Q. Do you understand that you are speaking
 8 as Certain Underwriters at Lloyd's?
 9 And I'm going to refer to Certain
 10 Underwriters on this policy as Lloyd's moving
 11 forward. Is that okay?
 12 A. No. Because I'm not representing
 13 Lloyd's. I'm representing North American Risk
 14 Insurance Services.
 15 Q. Okay. Well, this is a 1442 deposition
 16 for Lloyd's, London. So I need somebody -- so
 17 my understanding is you don't have the authority
 18 to speak on behalf of Lloyd's as a company?
 19 MR. MILLER:
 20 Object to the form of the question.
 21 You all produced a Notice to us for individuals
 22 that could speak to the areas of inquiry, and we
 23 are presenting this witness that can respond to
 24 some of the areas.
 25 And then there will be another

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1 witness that can response to the other areas.
 2 MR. HOUGHTALING:
 3 Yes, I understand. This is a 1442
 4 deposition, so --
 5 MR. MILLER:
 6 Right.
 7 MR. HOUGHTALING:
 8 -- the answers will be deemed
 9 answers of Lloyd's, correct?
 10 We have asked for a corporate
 11 representative of Lloyd's to speak to these
 12 issues.
 13 MR. MILLER:
 14 And we are producing a witness that
 15 can speak to the issues that were identified in
 16 the 1442.
 17 MR. ALVENIDA:
 18 Right. But, Allen, if I may, you
 19 know it is supposed to be a representative on a
 20 1442.
 21 If we pull the Article right now, it
 22 says a duly appointed representative of the
 23 corporate body. He has got to be speaking on
 24 behalf of Lloyd's. We can call the Judge.
 25 MR. MILLER:

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1 But that --
 2 MR. ALVENIDA:
 3 We need a corporate representative
 4 to talk about these topics.
 5 MR. HOUGHTALING:
 6 Yeah.
 7 MR. MILLER:
 8 Listen, therein lies the problem
 9 with the definition, John, you just gave of,
 10 quote, Lloyd's.
 11 We argued about this earlier. There
 12 is no single person that can speak to, quote, or
 13 for, quote, Lloyd's.
 14 MR. HOUGHTALING:
 15 Well --
 16 MR. MILLER:
 17 We have picked a representative that
 18 we think can best speak to the issues that you
 19 identified, and his testimony will be in
 20 response to the 1442.
 21 I don't know how to make it any
 22 better because the definition of Lloyd's that
 23 you all give is impossible.
 24 MR. HOUGHTALING:
 25 Okay.

10

1 MR. ALVENIDA:
 2 But they are the Defendant, and they
 3 answered the lawsuit, right, Allen? Like,
 4 they --
 5 MR. HOUGHTALING:
 6 Can I --
 7 MR. ALVENIDA:
 8 They answered the --
 9 MR. HOUGHTALING:
 10 Can I speak to --
 11 MR. ALVENIDA:
 12 -- lawsuit.
 13 MR. HOUGHTALING:
 14 So, Allen, look, we can sort of go
 15 round and round with this shell game of your
 16 definition of Lloyd's.
 17 I'm quite aware of what Lloyd's,
 18 London is, and we will get into that. We will
 19 get into that.
 20 But there are certain underwriters
 21 that have subscribed to this policy that are
 22 responsible for this policy that are Defendants
 23 in this lawsuit.
 24 We have asked for a corporate
 25 deposition of those entities and you have

11

1 produced this witness.
 2 MR. MILLER:
 3 Correct.
 4 MR. HOUGHTALING:
 5 What I am trying to get at very
 6 simply -- very simply is whether or not he is
 7 the representative of those people.
 8 MR. MILLER:
 9 He is the representative that we
 10 believe could most accurately be produced to
 11 respond to the areas of inquiry in your 1442
 12 notice.
 13 MR. HOUGHTALING:
 14 And --
 15 MR. MILLER:
 16 And he can answer -- I think his
 17 area, as you will see as you get into it, will
 18 be that he was involved with the claims related
 19 to this particular policy.
 20 And he is prepared to speak to those
 21 issues that are identified in your Notice.
 22 MR. HOUGHTALING:
 23 I get it. But he is a TPA. That is
 24 it. He is a third-party. He is a third-party
 25 administrator, meaning he is not a duly

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1 representative.
 2 EXAMINATION BY MR. HOUGHTALING:
 3 Q. Let me ask you this: Have you been
 4 appointed? Mr. Donoian, have you been appointed
 5 by any of the Underwriters that have subscribed
 6 to this policy as their corporate
 7 representative?
 8 A. As their what? I'm sorry.
 9 Q. Representative.
 10 A. I am not sure how I would be -- how I
 11 would be defined.
 12 Q. Do you know what a corporate
 13 representative is?
 14 A. I don't -- again, I don't know if I
 15 would fit in that definition. I would --
 16 Q. Yeah.
 17 A. -- defer to my Counsel for that.
 18 Q. Who is your Counsel?
 19 A. I mean, Phelps Dunbar as to whether that
 20 is what I am here for.
 21 Q. Okay. Yeah, that is what we are trying
 22 to get.
 23 I think my understanding is you work for
 24 a third-party administration company, correct?
 25 A. That is correct.

13	<p>1 Q. What is a third-party administrator 2 company? 3 A. I'm sorry? 4 Q. What is a third-party administration 5 company? 6 A. We administer the claims for our 7 clients -- 8 Q. Okay. 9 A. -- as they do not have their own claims 10 department. 11 Q. Right. So the underwriters who have 12 underwritten this policy -- first off, do you 13 know who the underwriters are that underwrite 14 this policy? 15 A. Not offhand, but I could find out. 16 Q. Okay. 17 A. But I don't know offhand. 18 Q. But sitting here today, you don't know 19 who the underwriters are? 20 A. I don't have it memorized, sir, no. 21 Q. Well, do you have anything -- can you 22 name one? 23 A. Yes. I believe it is Indian Harbor. 24 And I believe there was -- there are other ones 25 that might be involved.</p>	15	<p>1 MR. HOUGHTALING: 2 My question -- 3 MR. ALVENIDA: 4 -- speak anymore. I can tell you 5 that I was only mentioning something about the 6 representative. That is it. 7 MR. HOUGHTALING: 8 My question is: Who is defending 9 the deposition? 10 MR. MILLER: 11 I'm defending the deposition. 12 MR. HOUGHTALING: 13 Okay. So can we have an agreement 14 that only the person defending the deposition 15 will make objections or speak. And then, of 16 course, if there is something that -- we can 17 make exceptions to that, of course, by agreeing. 18 Is that all right? 19 MR. MILLER: 20 As long as it is reciprocal, yes. 21 MR. HOUGHTALING: 22 Agreed. Okay. That's fair. 23 EXAMINATION BY MR. HOUGHTALING: 24 Q. So, Mr. Donoian, I am sorry. Give it to 25 me again. Give me the pronunciation again so I</p>
14	<p>1 Q. Do you know? 2 A. I don't have them memorized, sir. I 3 have to -- 4 Q. Okay. Are -- 5 A. -- look them up -- 6 Q. Are you -- 7 A. -- in my claims. 8 Q. Are you speaking on behalf of Indian 9 Harbor, as Indian Harbor's corporate 10 representative? 11 MS. DODD: 12 Indian Harbor has not been named in 13 this lawsuit. They are a company. They have 14 not been named. 15 MR. HOUGHTALING: 16 Thanks, Ginger. 17 So who is defending the deposition? 18 MR. MILLER: 19 Well, it depends. You spoke. Rico 20 speaks. So, I don't know. 21 MR. HOUGHTALING: 22 Well, I definitely know Rico is not 23 defending the deposition. What I -- 24 MR. ALVENIDA: 25 I won't --</p>	16	<p>1 don't keep murdering it. 2 A. It is Donoian. 3 Q. Donoian, okay. 4 Sitting here today, who are you the 5 corporate representative of? 6 MR. MILLER: 7 Object to the form. 8 John, look, he doesn't have to be -- 9 he can speak in this deposition to your areas of 10 inquiry without accepting your definition of a 11 corporate representative. 12 MR. HOUGHTALING: 13 I get that. 14 MR. MILLER: 15 Under 1442, we can designate. Just 16 like Oceana's representative, you guys had a 17 bookkeeper. 18 MR. HOUGHTALING: 19 Yeah. 20 MR. MILLER: 21 That wasn't Mr. Badr, who is the 22 owner of the LLC. 23 There was a bookkeeper that you all 24 thought could speak to particular issues in this 25 case, and we deposed her.</p>

17

1 And so this gentleman can speak to
 2 certain issues in this case. Depose him.
 3 MR. ALVENIDA:
 4 Yeah, but, Allen, I'm --
 5 MR. HOUGHTALING:
 6 No, no.
 7 MR. ALVENIDA:
 8 -- going to say something --
 9 MR. MILLER:
 10 There you go.
 11 MR. HOUGHTALING:
 12 No, no. Rico. Rico. Rico. Rico,
 13 no, no.
 14 MR. ALVENIDA:
 15 I'm defending the depo.
 16 MR. HOUGHTALING:
 17 Rico. Rico. Rico. Rico. Look,
 18 please. Okay? Please. Otherwise, we are going
 19 to get back and forth, and this is going to be
 20 four lawyers doing this. All right?
 21 Allen, the problem is -- the legal
 22 problem is there is a difference between a
 23 third-party and the party itself.
 24 There is a legal difference. And
 25 when they go on the Record and they make a

18

1 statement, I need to know that it is the company
 2 making that statement and that is the bound
 3 person. And that is who we have noticed.
 4 We have not noticed -- I did not
 5 notice a third-party administrator. I know how
 6 to notice a third-party administrator. I'm
 7 quite well aware of what a third-party
 8 administrator is.
 9 We wanted a representative of
 10 Certain Underwriters that are underwriting this
 11 exactly as principals, not a third-party.
 12 Now the problem that we have got
 13 here -- and I understand that you outsource this
 14 stuff out. I get that. I understand how it
 15 works.
 16 But the problem is this gentleman
 17 can't speak and bind. He isn't speaking as if
 18 it is Certain Underwriters that are speaking.
 19 MR. MILLER:
 20 I --
 21 MR. HOUGHTALING:
 22 The managing member should be here
 23 speaking, not a third-party administrator. They
 24 are not the same entity.
 25 And although he may have

19

1 information, it is not the same in a 1442. So
 2 we have an issue here.
 3 So I am going to object, and I'm
 4 going to put on the Record now that Certain
 5 Underwriters, the Defendants in this matter,
 6 have not -- because we have established they
 7 have not -- put a person here that is their
 8 representative.
 9 This deponent can't even -- doesn't
 10 even know who he is here for, other than you
 11 guys. So, I understand he is a third-party
 12 administrator for the claim. I get that.
 13 But he is just a fact witness. He
 14 is not a party deponent, which I think we have
 15 established. Unless you want to stipulate to
 16 him being a party deponent, and then no problem.
 17 Then we can go on, and I can ask the questions
 18 legally; no problem.
 19 MR. MILLER:
 20 We can stipulate that he is here
 21 capable of answering questions about the claims
 22 process for this claim.
 23 MR. HOUGHTALING:
 24 That is not enough.
 25 MR. MILLER:

20

1 Well, I can't -- your objection is
 2 noted. Either you can depose him or not.
 3 MR. HOUGHTALING:
 4 Yeah, well, let's take a break.
 5 (Brief recess held.)
 6 MR. HOUGHTALING:
 7 Okay. Allen -- well, let me ask the
 8 witness.
 9 EXAMINATION BY MR. HOUGHTALING:
 10 Q. Sir, are you a director of any of the
 11 underwriters that are part of this policy?
 12 A. Am I a director?
 13 Q. Yes.
 14 A. Can you define what you mean by
 15 director?
 16 Q. A corporate director. Do you know what
 17 a corporate director is?
 18 A. Yes. I am not.
 19 Q. Okay.
 20 A. I am corporate appointee to discuss the
 21 claims handling of this claim.
 22 Q. Okay. Are you a managing agent of any
 23 of the underwriters that are named in this suit?
 24 A. No. Again, I am a corporate appointed
 25 representative to discuss the claims handling --

21

1 Q. I understand.
 2 A. -- of this claim.
 3 Q. Yes, sir. I understand you are a
 4 third-party administrator. I get that. Okay?
 5 MR. MILLER:
 6 John, that is not what he is saying.
 7 THE WITNESS:
 8 That is not what I said.
 9 MR. HOUGHTALING:
 10 All right. Then --
 11 THE WITNESS:
 12 I said I am a corporate appointed
 13 person to discuss the claims aspects of this
 14 claim.
 15 EXAMINATION BY MR. HOUGHTALING:
 16 Q. Appointed. You have been appointed by
 17 who?
 18 A. The carriers involved.
 19 Q. Who? Who appointed you? Which carriers
 20 appointed you?
 21 A. The carriers that handle -- that
 22 represent this market.
 23 Q. Which ones?
 24 A. I don't know what else to --
 25 Q. You got to know who it --

22

1 A. I know, but I'm looking at something and
 2 I don't know what I'm looking at.
 3 MR. HOUGHTALING:
 4 Oh, no. Rico, please take that off
 5 the screen.
 6 MR. MILLER:
 7 John, could I maybe get some
 8 clarity, if you let me?
 9 MR. HOUGHTALING:
 10 Let me ask the -- let me just
 11 establish that I think I understand what we are
 12 doing here, but --
 13 MR. MILLER:
 14 All right. Go ahead.
 15 MR. HOUGHTALING:
 16 Look, I mean, I think Allen, if one
 17 thing that would happen is if you will stipulate
 18 here that he is speaking with authority on
 19 behalf of the underwriters.
 20 The problem is, here is what we
 21 have: We have a witness that doesn't even know
 22 -- I mean, the game of who is Lloyd's, London is
 23 too good here because you are --
 24 MR. MILLER:
 25 Let me address --

23

1 MR. HOUGHTALING:
 2 The witness doesn't even know who he
 3 is talking to. Now, this is a fun game, but
 4 this becomes a problem when you are trying to --
 5 if he doesn't even know who he is here for.
 6 MR. MILLER:
 7 Let me address your proposed
 8 stipulation.
 9 We can stipulate that he is here to
 10 speak on behalf of the subscribing underwriters
 11 on this particular policy related to the claims
 12 process, which is one of the areas.
 13 And then we will have another
 14 witness that will address some of the other
 15 areas.
 16 MR. HOUGHTALING:
 17 Because I'm not interested in what a
 18 third-party is doing. That is a separate
 19 entity. I am interested in someone speaking to
 20 Certain Underwriters.
 21 MR. MILLER:
 22 And with respect to the claims
 23 process for this policy and these particular
 24 underwriters to this policy, he has been
 25 designated as the person to speak on their

24

1 behalf.
 2 MR. HOUGHTALING:
 3 Okay. I am going to reserve my
 4 right --
 5 EXAMINATION BY MR. HOUGHTALING:
 6 Q. Well, let me ask you this: Sir, have
 7 you had any contact at all with the Certain
 8 Underwriters about this particular matter?
 9 A. About this claim.
 10 Q. Yes.
 11 A. No. But I know this claim.
 12 Q. All right. Let me try it again.
 13 Have you spoken to any of the Certain
 14 Underwriters about this claim?
 15 A. I have spoken to the Certain
 16 Underwriters in regards to the COVID losses,
 17 yes. This claim may have come up at one point
 18 during those conversations.
 19 Q. Sitting here today, can you recall any
 20 conversations you have had specifically about
 21 this claim, the business interruption claim on
 22 COVID with the Certain Underwriters of this
 23 policy?
 24 A. When this claim first came in, we did
 25 discuss that we had a suit filed on this loss,

25	<p>1 yes.</p> <p>2 Q. Who is "we?"</p> <p>3 A. Me and the Certain Underwriters.</p> <p>4 Q. Who?</p> <p>5 A. You want names? It was back in March,</p> <p>6 sir, so I'm not sure if I remember the actual</p> <p>7 names.</p> <p>8 Q. Okay. You don't remember the actual</p> <p>9 names of the persons?</p> <p>10 A. There was a number of people on that</p> <p>11 call, sir.</p> <p>12 Q. Okay. And when was that call?</p> <p>13 A. It was a call not just about this claim,</p> <p>14 but to discuss handling of all COVID-related</p> <p>15 matters.</p> <p>16 Q. Oh, it was discussing all COVID-related</p> <p>17 matters, not specifically this claim?</p> <p>18 A. Correct.</p> <p>19 Q. And when did that call occur?</p> <p>20 A. I would have to say sometime in March.</p> <p>21 Q. The beginning of March? End of March?</p> <p>22 A. It was probably the end of March, sir.</p> <p>23 It was -- you know, it was, like I said, it was</p> <p>24 after you -- after you, as the insurer's</p> <p>25 attorney, filed the suit. So it was after that,</p>	27	<p>1 EXAMINATION BY MR. HOUGHTALING:</p> <p>2 Q. Okay. Do you remember anyone that was</p> <p>3 on the call?</p> <p>4 A. Probably one name.</p> <p>5 Q. Which one is that?</p> <p>6 A. It was maybe Isaac Franks.</p> <p>7 Q. Who is Isaac Franks?</p> <p>8 A. He works for one of the -- one of the</p> <p>9 markets.</p> <p>10 Q. What do you mean "one of the markets"?</p> <p>11 A. He works for one of the carriers</p> <p>12 involved in the market that insures your client.</p> <p>13 Q. Okay. Which one?</p> <p>14 A. I believe it is Indian Harbor. Indian</p> <p>15 -- again, there is a lot. I don't remember the</p> <p>16 actual name.</p> <p>17 Q. Look, this is not a memory test. So if</p> <p>18 you don't know, that is a perfectly --</p> <p>19 A. Then -- then I don't know.</p> <p>20 Q. Yeah. This isn't a -- this isn't a test</p> <p>21 for you. So if you don't recall, that is a</p> <p>22 perfectly fine answer, okay? I don't want you</p> <p>23 to guess. All right?</p> <p>24 A. Uh-huh.</p> <p>25 Q. Fair enough?</p>
26	<p>1 sir. So you would know what date you filed this</p> <p>2 suit, and it was after that.</p> <p>3 Q. Okay. Well, I'm asking you. I know</p> <p>4 what date I filed the suit. But I need to ask</p> <p>5 you, okay?</p> <p>6 A. And I -- and, again, I don't remember</p> <p>7 the actual date.</p> <p>8 All I could tell you I know is after you</p> <p>9 filed suit, because we knew of this suit; it was</p> <p>10 out there.</p> <p>11 Q. Who is "we?"</p> <p>12 A. Everybody that was on the call, as we</p> <p>13 just discussed.</p> <p>14 Q. Okay. Who is --</p> <p>15 A. I don't remember who was on that call,</p> <p>16 sir.</p> <p>17 MR. MILLER:</p> <p>18 Asked and answered.</p> <p>19 EXAMINATION BY MR. HOUGHTALING:</p> <p>20 Q. Okay. You don't remember who was on the</p> <p>21 call?</p> <p>22 MR. MILLER:</p> <p>23 Asked and answered.</p> <p>24 THE WITNESS:</p> <p>25 I answered that.</p>	28	<p>1 A. Yes.</p> <p>2 Q. Okay. And who initiated that call?</p> <p>3 A. I don't remember.</p> <p>4 Q. Is Isaac Franks an adjuster?</p> <p>5 A. I don't know his title.</p> <p>6 Q. Do you know if he works directly for</p> <p>7 Certain Underwriters?</p> <p>8 A. I do not know that.</p> <p>9 MR. MILLER:</p> <p>10 Asked and answered.</p> <p>11 MR. HOUGHTALING:</p> <p>12 Sorry?</p> <p>13 THE WITNESS:</p> <p>14 I believe Allen answered.</p> <p>15 MR. HOUGHTALING:</p> <p>16 I know Allen --</p> <p>17 MR. MILLER:</p> <p>18 I said --</p> <p>19 MR. HOUGHTALING:</p> <p>20 I know Allen would love to answer,</p> <p>21 and I would love to depose Allen, but I can't.</p> <p>22 So I need you to --</p> <p>23 THE WITNESS:</p> <p>24 I don't --</p> <p>25 EXAMINATION BY MR. HOUGHTALING:</p>

29	<p>1 Q. Sorry?</p> <p>2 A. I don't know.</p> <p>3 Q. You don't know. Okay.</p> <p>4 You don't know. So sitting here today</p> <p>5 you don't know if you spoke to another adjuster</p> <p>6 or whether you spoke directly to Certain</p> <p>7 Underwriters, correct?</p> <p>8 A. Again, as I stated, he works for one of</p> <p>9 the underwriters. He is in the claims</p> <p>10 department, I believe. And we discussed the</p> <p>11 claims.</p> <p>12 Q. So what I am trying to understand is: I</p> <p>13 understand that in the claims business that</p> <p>14 insurance companies and carriers and</p> <p>15 underwriters outsource claims handling. I get</p> <p>16 that. And they do it a lot, right?</p> <p>17 A. Yeah. Yes.</p> <p>18 Q. All right. So what I want to understand</p> <p>19 is whether you spoke to anyone who was from the</p> <p>20 Certain Underwriters themselves.</p> <p>21 A. The --</p> <p>22 Q. If you don't know --</p> <p>23 A. I believe --</p> <p>24 Q. I mean, if you don't know, that is a</p> <p>25 perfectly acceptable answer.</p>	31	<p>1 A. Yes.</p> <p>2 Q. Okay. What do you recall about that</p> <p>3 specifically, that phone call about Oceana,</p> <p>4 other than the fact they filed a lawsuit?</p> <p>5 A. There was not -- much of the</p> <p>6 conversation was that they had filed a lawsuit</p> <p>7 and we were going to answer the suit.</p> <p>8 In that phone call, that was pretty much</p> <p>9 all that was discussed.</p> <p>10 Q. What was the next thing you recall with</p> <p>11 regard to this matter specifically? What other</p> <p>12 -- strike that.</p> <p>13 What other communication did you have</p> <p>14 directly with Certain Underwriters regarding</p> <p>15 this particular claim?</p> <p>16 A. None. None that I remember.</p> <p>17 Q. So the totality of your communications</p> <p>18 regarding Certain Underwriters on this claim</p> <p>19 consisted of one phone call in March where a</p> <p>20 group of claims were discussed?</p> <p>21 A. That, and that this file is being</p> <p>22 handled by us, and that I do review the file</p> <p>23 regularly just to make sure that it is moving</p> <p>24 forward correctly.</p> <p>25 Q. But that was the only communications</p>
30	<p>1 A. I believe there were representatives on</p> <p>2 that call, but I don't know who they</p> <p>3 represented.</p> <p>4 Q. All right. And tell me everything you</p> <p>5 remember about that conversation, whatever</p> <p>6 specifics you remember.</p> <p>7 You have told me -- let's refresh. You</p> <p>8 have told me that a lawsuit was filed. Other</p> <p>9 than that, what do you remember?</p> <p>10 A. We discussed how -- again, not just this</p> <p>11 claim.</p> <p>12 We discussed how we were going to</p> <p>13 investigate these claims to make a coverage</p> <p>14 determination on each claim individually and how</p> <p>15 coverage would fit into those claims.</p> <p>16 Q. So I want to ask you about our claim and</p> <p>17 your claim handling of our claim, specifically</p> <p>18 Oceana's claim.</p> <p>19 You are familiar with Oceana, right?</p> <p>20 A. Yep.</p> <p>21 Q. You are involved in another lawsuit</p> <p>22 where there is some controversy over the claims</p> <p>23 handling, correct?</p> <p>24 A. Yes.</p> <p>25 Q. So, you know the restaurant?</p>	32	<p>1 that you had with Certain Underwriters, was that</p> <p>2 phone call?</p> <p>3 A. It is the only communications I had,</p> <p>4 yes.</p> <p>5 Q. And after that, no communications?</p> <p>6 A. I did not have any communications.</p> <p>7 Q. When you say "I," you kind of gave an</p> <p>8 inflection there. Did anyone else?</p> <p>9 A. I don't know. I can't speak for people</p> <p>10 that I don't know, if they had conversations</p> <p>11 with them or not.</p> <p>12 Q. Can you speak for Certain Underwriters?</p> <p>13 A. I'm speaking for myself since you asked</p> <p>14 me, sir, if I had had other conversations. And</p> <p>15 my answer would be no.</p> <p>16 Q. But you can't speak on behalf of Certain</p> <p>17 Underwriters with regard to what they did,</p> <p>18 correct?</p> <p>19 MR. MILLER:</p> <p>20 Objection to the form.</p> <p>21 I think we have already stipulated</p> <p>22 he can speak for Certain Underwriters with</p> <p>23 respect to the handling of the claims in this</p> <p>24 file.</p> <p>25 MR. HOUGHTALING:</p>

<p style="text-align: right;">33</p> <p>1 He can, if factually he knows. 2 MR. MILLER: 3 Well, you haven't asked him any 4 facts. 5 MR. HOUGHTALING: 6 No. I've noticed the claim handling 7 of the Certain Underwriters, and what I've got 8 is a third-party who was on one phone call. 9 That is what I've got. 10 MR. MILLER: 11 And -- 12 MR. HOUGHTALING: 13 I'm not going to do this with you 14 because -- let's not do that. 15 EXAMINATION BY MR. HOUGHTALING: 16 Q. After that phone call, what was the next 17 action you took on this particular file? 18 A. The file is being handled in my unit 19 that I manage. And I will every once in a while 20 -- every so often regularly I will check files 21 to make sure again that they are moving forward 22 and that reporting is being done properly and 23 that the file is being handled properly. 24 Q. So what did you particularly do? It was 25 after the phone call. What was the next thing</p>	<p style="text-align: right;">35</p> <p>1 Anything -- 2 A. I don't know, sir. 3 Q. -- to the file? 4 MR. MILLER: 5 Objection. Object to the form of 6 the question. Lacks foundation. 7 EXAMINATION BY MR. HOUGHTALING: 8 Q. Other than the phone call, what was the 9 next thing? What was the next piece of 10 correspondence you got on this file? 11 MR. MILLER: 12 Same objection. 13 MR. HOUGHTALING: 14 You can answer. 15 THE WITNESS: 16 Can you repeat the question, please? 17 MR. HOUGHTALING: 18 Yeah. 19 EXAMINATION BY MR. HOUGHTALING: 20 Q. You talked about a phone call that you 21 had with a group of people where it was 22 discussed that this claim had been filed. And 23 there was a discussion of this claim and other 24 claims. 25 After that phone call, what was the next</p>
<p style="text-align: right;">34</p> <p>1 you did after that phone call on this file? 2 MR. MILLER: 3 Asked -- 4 THE WITNESS: 5 Me, specifically? 6 MR. MILLER: 7 -- and answered. 8 MR. HOUGHTALING: 9 You, specifically. 10 EXAMINATION BY MR. HOUGHTALING: 11 Q. What did you do specifically on this 12 file after that phone call? 13 A. I reviewed it to make sure that -- 14 again, I reviewed the file to make sure that it 15 was being processed and handled correctly. 16 Q. Yeah. I need some more specifics from 17 that. So, let me try to ask you some questions. 18 What happened next after you had the 19 phone call? What was the next piece of 20 correspondence at all with regard to this file? 21 A. I am sorry? Ask that -- 22 Q. What was -- 23 A. -- again, please. 24 Q. -- the next piece of correspondence; 25 Email, text message, phone call, carrier pigeon?</p>	<p style="text-align: right;">36</p> <p>1 piece of correspondence you got on this claim? 2 A. I don't know. 3 Q. Did you get any other piece of 4 correspondence on this claim after the phone 5 call? 6 A. Other correspondence has been involved. 7 I don't know what the next piece was, when it 8 was received. I don't know that without -- if 9 you want to give me, you know, an hour to review 10 the claim, I will gladly do that. 11 Q. What part of the 1442 deposition are you 12 here to speak to? 13 A. And, again, I am here to speak to the 14 handling of the claim itself. 15 Q. Are you the best person to speak to 16 about the handling of the claim itself? 17 A. I am the corporate appointee as to who 18 is to handle this call, yes, sir. 19 Q. And that is not exactly what my question 20 was. Let me try again. 21 Are you the person with the most 22 knowledge on the handling of this particular 23 claim? 24 MR. MILLER: 25 Object to the form of the question.</p>

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1 THE WITNESS:
 2 I don't know if anybody has more
 3 knowledge of the claim.
 4 MR. HOUGHTALING:
 5 Who else was working on it? Who
 6 else was working on this claim in your company?
 7 THE WITNESS:
 8 Daniel Larose.
 9 EXAMINATION BY MR. HOUGHTALING:
 10 Q. Who is Daniel Larose?
 11 A. Daniel Larose is a general adjuster with
 12 North American Risk Insurance Services.
 13 Q. Does he report to you?
 14 A. Yes.
 15 Q. How did Daniel Larose report to you on
 16 this claim?
 17 A. That is not what you asked me. You
 18 asked me if he reported to me. You --
 19 Q. I asked you --
 20 A. -- asked me if he reported to me, sir,
 21 and that is what I answered, yes.
 22 MR. HOUGHTALING:
 23 Can we read back the question, Kay?
 24 (Question read back.)
 25 EXAMINATION BY MR. HOUGHTALING:

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1 Q. Well, let me ask you this: What other
 2 correspondence have you had, other than the
 3 phone call with anyone regarding this claim?
 4 A. Have I had?
 5 MR. MILLER:
 6 Object to the form of the question.
 7 MR. HOUGHTALING:
 8 You.
 9 MR. MILLER:
 10 You can --
 11 THE WITNESS:
 12 Can you --
 13 MR. MILLER:
 14 You can answer.
 15 THE WITNESS:
 16 Can you reformulate that question?
 17 Are you asking what other correspondence I have
 18 had?
 19 MR. HOUGHTALING:
 20 Yes. With anyone other than the
 21 phone call.
 22 THE WITNESS:
 23 I have not had correspondence.
 24 EXAMINATION BY MR. HOUGHTALING:
 25 Q. What about with Daniel Larose?

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1 A. Have I had correspondence with Daniel
 2 Larose about this claim? Is that what -- I am
 3 not sure what you are asking me, sir.
 4 Q. Yeah. Look, you have been appointed.
 5 You have been presented as the person at Lloyd's
 6 that has knowledge of the claims handling of
 7 this. And all I can establish at this point is
 8 you have one phone call, one single phone call
 9 where you can't remember who was on it.
 10 MR. MILLER:
 11 Yeah. But, John, look --
 12 MR. HOUGHTALING:
 13 You don't remember.
 14 MR. MILLER:
 15 You can --
 16 MR. HOUGHTALING:
 17 Hold on.
 18 MR. MILLER:
 19 -- preach all day.
 20 MR. HOUGHTALING:
 21 I'm not finished with --
 22 MR. MILLER:
 23 But do you have a question for him?
 24 MR. HOUGHTALING:
 25 -- my question. I'm not --

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1 MR. MILLER:
 2 It didn't sound --
 3 MR. HOUGHTALING:
 4 I am not finished.
 5 MR. MILLER:
 6 -- like a question.
 7 MR. HOUGHTALING:
 8 And you interrupted it. I'm
 9 trying --
 10 MR. MILLER:
 11 You are not --
 12 EXAMINATION BY MR. HOUGHTALING:
 13 Q. I am trying to understand from you what
 14 you did other than the phone call; what do you
 15 know.
 16 MR. MILLER:
 17 You are not asking him what he
 18 knows. You are asking him about correspondence.
 19 EXAMINATION BY MR. HOUGHTALING:
 20 Q. I'm asking what you did. Firsthand,
 21 what did you do?
 22 MR. MILLER:
 23 I'm just going to lodge a continuing
 24 objection --
 25 MR. HOUGHTALING:

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1 Thank you.
 2 MR. MILLER:
 3 -- because that is not what the
 4 1442 --
 5 MR. HOUGHTALING:
 6 Thank you.
 7 MR. MILLER:
 8 -- requires, but --
 9 MR. HOUGHTALING:
 10 Look, Allen. You put somebody up
 11 that doesn't know anything about this claim,
 12 okay?
 13 MR. MILLER:
 14 That is not true.
 15 MR. HOUGHTALING:
 16 He didn't do anything on this claim.
 17 MR. MILLER:
 18 He had --
 19 MR. HOUGHTALING:
 20 And you --
 21 MR. MILLER:
 22 We have an obligation --
 23 MR. HOUGHTALING:
 24 Give me a break.
 25 MR. MILLER:

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1 -- to put someone up that can speak
 2 to --
 3 MR. HOUGHTALING:
 4 Give me a break.
 5 MR. MILLER:
 6 -- the claim and --
 7 MR. HOUGHTALING:
 8 Yes, and he has got --
 9 MR. MILLER:
 10 -- they can --
 11 MR. HOUGHTALING:
 12 -- one -- he knows of a phone call.
 13 MR. MILLER:
 14 And how they get their knowledge
 15 doesn't matter.
 16 MR. HOUGHTALING:
 17 Okay. I know.
 18 MR. MILLER:
 19 If he has the knowledge, he has the
 20 knowledge. You are not --
 21 EXAMINATION BY MR. HOUGHTALING:
 22 Q. Okay. What did you --
 23 MR. MILLER:
 24 -- asking him about what he knows.
 25 EXAMINATION BY MR. HOUGHTALING:

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1 Q. What did you do?
 2 A. Again, I have reviewed the claim on a
 3 regular basis, so that I know that the claim is
 4 moving forward in the suit process. And I
 5 understand, you know, what has been completed by
 6 Mr. Larose, and how counsel -- your office, what
 7 you have done to file all those motions. And
 8 that I know that the claim is moving forward in
 9 this -- in the suit process.
 10 Q. Okay. Other than that, I'm trying to
 11 understand your firsthand knowledge and what you
 12 did and who reported to you.
 13 Let me ask you: Does Daniel Larose does
 14 he report to you?
 15 A. You asked that already, sir. Yes. I
 16 answer that.
 17 Q. All right. But you can't remember if
 18 you have had any correspondence with Daniel
 19 Larose on this file, correct?
 20 A. Again --
 21 MR. MILLER:
 22 Object to the form. Asked and
 23 answered.
 24 THE WITNESS:
 25 I'm not -- now that you are -- you

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1 are breaking up, so I don't know --
 2 MR. HOUGHTALING:
 3 Okay.
 4 THE WITNESS:
 5 -- what --
 6 EXAMINATION BY MR. HOUGHTALING:
 7 Q. You can't tell me any correspondence you
 8 have had with Mr. Larose, can you, on this file?
 9 Or, can you? Strike that.
 10 A. I don't have the correspondence --
 11 Q. Look, I --
 12 A. I don't have whatever -- like your file,
 13 I don't have to have correspondence with the
 14 adjuster to review the file.
 15 Q. Okay. So is my understanding the
 16 totality of your involvement in this claim is
 17 reviewing a file; is that correct?
 18 A. You broke up, sir.
 19 Q. Okay. Is the totality of your work in
 20 this matter reviewing a file?
 21 A. I review the file and, if necessary,
 22 give direction. Yes, sir.
 23 Q. What direction have you taken on this
 24 claim? Other than reviewing the file, what
 25 direction have you taken on the claim?

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1 A. The file has been going smoothly. There
 2 hasn't been any direction necessary from a
 3 management point of view.
 4 Q. Okay. So the answer is nothing,
 5 correct?
 6 A. I answered the question, sir.
 7 Q. Have you done anything on the file?
 8 A. Again, sir, I gave you --
 9 Q. Other than reviewing it, have you done
 10 anything on the file?
 11 MR. MILLER:
 12 Object to the form of the question.
 13 It assumes facts not in evidence.
 14 MR. HOUGHTALING:
 15 I don't have any facts of what he
 16 did. I'm trying to get to them.
 17 I'm trying to understand. Other
 18 than reviewing the file or --
 19 MR. MILLER:
 20 Well, it is not as if Oceana
 21 actually filed a claim.
 22 MR. HOUGHTALING:
 23 I am --
 24 MR. MILLER:
 25 You filed a lawsuit.

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1 MR. HOUGHTALING:
 2 Thank you. Allen, you want me to --
 3 I can like swear you in.
 4 EXAMINATION BY MR. HOUGHTALING:
 5 Q. Now, sir, other than review the file,
 6 you haven't done anything on this claim,
 7 correct?
 8 A. Again, as part of the original phone
 9 call, we were advised who to assign the file to.
 10 I provided that direction to Mr. Larose, to get
 11 the file assigned to counsel and to make sure
 12 that it was answered.
 13 I make sure that the dates of the --
 14 that they need to be adhered to set by the
 15 courts, and I adhere to them. And I review the
 16 file to make sure that it is being handled in
 17 accordance with legal matters.
 18 Q. So you are kind of like a litigation
 19 manager?
 20 A. No, sir. I look at claims and what is
 21 happening.
 22 Q. Okay. So other than assigning the file
 23 to another adjuster and having counsel hired and
 24 reviewing what counsel did, you haven't done
 25 anything yourself, correct?

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1 MR. MILLER:
 2 Object to the form of the question.
 3 Asked and answered.
 4 THE WITNESS:
 5 I don't handle the file on a
 6 day-to-day basis, sir.
 7 MR. HOUGHTALING:
 8 No, no, no. I'm not asking you
 9 about day-to-day.
 10 EXAMINATION BY MR. HOUGHTALING:
 11 Q. I asking you to give me one single thing
 12 you did other than take the phone call, review
 13 the file, and hire counsel.
 14 MR. MILLER:
 15 That is three. Object to the form
 16 of the question.
 17 EXAMINATION BY MR. HOUGHTALING:
 18 Q. Other than that. Other than that, have
 19 you done anything?
 20 A. Again, sir, I review the file --
 21 Q. Is that all it is?
 22 A. -- on a monthly basis.
 23 Q. Is that all --
 24 A. I review the file on a monthly basis.
 25 What I have done on those monthly bases, I can't

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1 tell you. Again, if you want to give me an hour
 2 to review the claim, I will.
 3 Q. Have you reviewed the claim prior to
 4 your deposition?
 5 A. Again, you broke up.
 6 Q. Did you review the claim prior to the
 7 deposition?
 8 A. No.
 9 Q. When was the last time you reviewed the
 10 claim?
 11 A. A couple of weeks ago.
 12 Q. And what did you notice? What did you
 13 review in the claim a couple of weeks ago?
 14 A. That you folks had -- were going to file
 15 another motion and that depositions were going
 16 to be taken.
 17 Q. What about investigating the claim
 18 itself? What do you know about the claim being
 19 investigated itself?
 20 A. I believe a questionnaire was provided
 21 to your client. I don't know if that
 22 questionnaire was responded to.
 23 Q. Who pays your company?
 24 A. That is something I am not privy to,
 25 sir.

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1 Q. How long have you been in the insurance
 2 business?
 3 A. 35 years, sir.
 4 Q. How long have you worked for this
 5 company?
 6 A. Two and a half years, sir.
 7 Q. And this company works for who --
 8 A. They work for --
 9 Q. -- in this matter?
 10 A. -- a number of different clients,
 11 insurance carriers, and markets.
 12 Q. In this matter? In this matter, right?
 13 A. I don't know the name. Again, it is a
 14 conglomerate of insurance that handles this that
 15 I can't give it to you.
 16 If you want to give me, again, a little
 17 bit of time, I'll check and get you the names.
 18 I don't know.
 19 Q. You don't know who they are?
 20 A. The names aren't in this claim.
 21 Q. Right now, you don't know who you really
 22 work for, right?
 23 MR. MILLER:
 24 Object to the form of the question.
 25 THE WITNESS:

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1 We report to the -- again, the name
 2 of the carrier, the name of the market, however
 3 you want to refer to them, it is not something I
 4 remember.
 5 There is a lot of these. I don't
 6 remember this one particularly to give you the
 7 exact name.
 8 EXAMINATION BY MR. HOUGHTALING:
 9 Q. Well, you are --
 10 A. I will find that out and let you know.
 11 Q. I'm just kind of curious what you know
 12 sitting here today. It is not -- like I said,
 13 it is not a test.
 14 Who do you report to?
 15 A. Who do I report to?
 16 Q. Yes.
 17 A. Michael Marcel.
 18 Q. Who is that?
 19 A. He is the property director of North
 20 American Risk Services.
 21 Q. Okay. And have you had any discussions
 22 about this particular claim with him?
 23 A. He may have been on that call
 24 originally. I don't remember.
 25 Q. Other than that, do you recall any other

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1 correspondence with him on that?
 2 A. No, I do not.
 3 Q. Okay. Who reports to the client?
 4 A. Could you rephrase that, please?
 5 Q. Who reports to your client?
 6 MR. MILLER:
 7 Object to the form of the question.
 8 THE WITNESS:
 9 Same question. Can you rephrase
 10 that, please?
 11 EXAMINATION BY MR. HOUGHTALING:
 12 Q. Do you know who your client is?
 13 MR. MILLER:
 14 Objection. Asked and answered.
 15 I think he said that more than once
 16 already.
 17 MR. HOUGHTALING:
 18 I think he said he wasn't sure, so
 19 I'm kind of trying to probe it.
 20 EXAMINATION BY MR. HOUGHTALING:
 21 Q. Who do you report to at Certain
 22 Underwriters?
 23 MR. MILLER:
 24 Same objection.
 25 THE WITNESS:

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1 We have a listing on each. And
 2 there is different versions; there is different
 3 policy periods. Each one has different people
 4 who you report to.
 5 On this particular claim, I couldn't
 6 tell you that. But I would have -- I would be
 7 able to look that up, if you want to give me,
 8 you know, 20 minutes. I will look it up.
 9 EXAMINATION BY MR. HOUGHTALING:
 10 Q. Okay. So sitting here today, you can't
 11 recall reporting to anybody after that phone
 12 call, correct?
 13 MR. MILLER:
 14 Objection.
 15 THE WITNESS:
 16 I did not.
 17 MR. HOUGHTALING:
 18 Okay.
 19 THE WITNESS:
 20 That doesn't mean the file wasn't
 21 reported up.
 22 EXAMINATION BY MR. HOUGHTALING:
 23 Q. I'm sorry?
 24 A. Conversations have been held -- had with
 25 the appropriate people. I just can't give you

<p style="text-align: right;">53</p> <p>1 those names because I don't have them memorized. 2 Q. You don't know who the appropriate 3 people are, and you don't know what 4 conversations were had, correct? 5 A. Again, I don't -- there is numerous 6 names, and I don't remember who was involved at 7 what market. 8 Q. All right. We are -- 9 A. So, no, I don't have the names for you. 10 I could look them up. But you would have to 11 give me like 15, 20 minutes. 12 Q. I see. Yeah. Okay. 13 MR. HOUGHTALING: 14 I'm going to take a quick break 15 here. I think I'm done wasting my time. Hold 16 on. 17 (Brief recess held.) 18 MR. HOUGHTALING: 19 Allen, who is -- maybe we can 20 shorten this up. 21 Can you give me an idea of which 22 numbers you are producing him for? 23 MR. MILLER: 24 13 and 14. 25 MR. HOUGHTALING:</p>	<p style="text-align: right;">55</p> <p>1 MR. HOUGHTALING: 2 The difference between his knowledge 3 and what he is being produced for -- 4 MR. MILLER: 5 He is being produced for his 6 knowledge. 7 MR. HOUGHTALING: 8 He is being produced as a 9 representative, the person that is in the best 10 position to tell me about certain things. And 11 that is fine if he is the best person that has 12 more knowledge of it. 13 If that is your corporate 14 representative, that is fine. So it is 13, 15 14 -- 11, 13, 14. All right. 16 EXAMINATION BY MR. HOUGHTALING: 17 Q. Sir, do you have -- 18 MR. MILLER: 19 And let me be clear. My position is 20 you need to ask the witness about the areas, not 21 me. 22 And so he is here to speak to some 23 of them. I don't know the total breadth of his 24 knowledge base. 25 MR. HOUGHTALING:</p>
<p style="text-align: right;">54</p> <p>1 Okay. Other than -- 2 MR. MILLER: 3 For sure. 4 MR. HOUGHTALING: 5 I'm sorry? 6 MR. MILLER: 7 13 and 14. 11 -- portions of 11. 8 You could probably -- you would do better if you 9 just ask him what he -- what he could testify to 10 by just going through them like I did with your 11 witness. 12 MR. HOUGHTALING: 13 Yeah. Well, but that -- that is a 14 different question, Allen. 15 I mean, the question is: You are 16 producing him. I've requested you to designate 17 a person. And my understanding is -- because we 18 have got it on the Record -- you are producing 19 him for 11, 13, and 14. Any others? 20 MR. MILLER: 21 I think the witness is better 22 capable of telling you the areas that he can 23 speak to. So, there you go. That is my answer. 24 If you don't want to ask him 25 questions about the notice, that is on you.</p>	<p style="text-align: right;">56</p> <p>1 Okay. Well, I'm not just interested 2 in the total breadth of his knowledge base. I'm 3 interested in it on this particular claim and 4 I'm interested in what he is being produced for, 5 okay? 6 So, because if Lloyd's doesn't 7 produce people that can answer certain 8 questions, then this is going to be a problem we 9 will have to address with the court. 10 EXAMINATION BY MR. HOUGHTALING: 11 Q. So, sir, let me ask you: Mr. Donoian, 12 do you have the 1442 notice in front of you? 13 A. No, sir. I do not. 14 Q. Okay. We will put it up on the screen. 15 And I would like to ask you if you know whether 16 you are being produced with the authority to 17 speak to the certain subjects that we have 18 outlined here on behalf of Certain Underwriters. 19 Okay. Number 1, the underwriting 20 process in the issuance of Lloyd's Property and 21 Business Income (extra expense) policy, and any 22 other policy. 23 A. I'm sorry. There is pictures in the 24 way, and I can't see. So hold on a second. 25 Q. Okay. I think you can take that box --</p>

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1 A. Okay. Okay. I'm not -- I'm not
 2 involved in the underwriting process.
 3 Q. Okay. So, Number 2, you wouldn't be
 4 involved in that at all?
 5 A. I don't believe there is manuscript
 6 policies involved here. But, no, I'm not
 7 involved in that.
 8 Q. Number 3?
 9 A. No, I am not involved in that, sir.
 10 Q. Number 4?
 11 A. So I'm not sure what 4 is asking.
 12 Are you asking am I involved with the
 13 writing -- the formulation of the policy?
 14 Q. Any of the endorsements or forms
 15 utilized by Lloyd's to exclude any physical loss
 16 or damage caused by a virus.
 17 A. I am not in involved that.
 18 Q. Number 5?
 19 A. I am not involved in that.
 20 Q. Number 6?
 21 A. No, I wouldn't be involved in that, sir.
 22 Q. Number 7?
 23 A. I'm not involved in the rating.
 24 Q. Next. Number 8?
 25 A. I wouldn't know, sir.

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1 Q. Number 9?
 2 A. I do not know.
 3 Q. Number 10?
 4 A. I wouldn't -- I don't know.
 5 Q. Number 11?
 6 A. I am aware of claims quality control,
 7 not underwriting quality control, sir.
 8 Q. Okay. What specifically about this
 9 particular claim can you tell me about that,
 10 other than what you have told me?
 11 A. I can tell you that we sent out the
 12 questionnaire. We sent out a Reservation of
 13 Rights letter. I believe the claim was
 14 subsequently denied.
 15 And that we believe that the claim was
 16 reviewed -- I review it to make sure that it is
 17 being handled based on quality claims handling
 18 guidelines.
 19 Q. What do you mean to make sure it is
 20 handled by quality claims handling guidelines?
 21 A. Well, the question is the claims quality
 22 control. So I make sure that it is being
 23 handled to meet a quality file.
 24 Q. What does that mean, a quality file?
 25 A. That it meets, you know, with our

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1 general practices and how we handle our claims.
 2 Q. Who is "our?" When you say that in that
 3 sentence, who is "our?"
 4 A. North American Risk.
 5 Q. What about Certain Underwriters?
 6 A. I am sorry?
 7 Q. What about Certain Underwriters?
 8 A. Our claims -- part of our guidelines is
 9 to handle our claims within their protocol.
 10 Q. What is their protocol? What protocol
 11 are you referring to?
 12 A. There is a lot of them, sir. I couldn't
 13 -- you know, it is just to make sure that the
 14 claim is being handled in accordance with the
 15 jurisdiction that the suit -- that the claim was
 16 filed in.
 17 And to make sure mail is being handled,
 18 handled in a timely manner. It is to make sure
 19 that phone calls are being responded to, Emails
 20 are responded to, files are corresponded
 21 correctly, files are reported correctly.
 22 Q. Have you generated any Emails or phone
 23 calls or anything with regard to this file?
 24 A. I don't remember, sir.
 25 Q. Do you have any protocols in writing

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1 from Certain Underwriters?
 2 A. We have handling guidelines, sir, just
 3 as we have with all our clients.
 4 Q. I'm sorry?
 5 A. We have certain handling guidelines with
 6 all of our clients. So they all have different
 7 specific requirements, and we handle our claims
 8 in accordance with their specific requirements.
 9 Q. How are the specific requirements with
 10 Certain Underwriters different than your other
 11 clients?
 12 A. They are not -- they are different --
 13 some carriers give us 25,000 in authority. Some
 14 give us 50,000 in authority. Some give us
 15 100,000 in authority.
 16 Some, you know, let us, you know, choose
 17 who we are going to use as experts. Some want
 18 them, themselves, to choose their specific
 19 experts. Every one of our clients -- again, the
 20 parameters -- the handling parameters are
 21 different.
 22 Q. Do you choose the lawyers?
 23 A. I don't know how we chose the attorney
 24 on this one, whether it was an attorney we
 25 recommended or an attorney the market

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1 recommended. I do not know.
 2 Q. And for Certain Underwriters, are you
 3 given the authority to choose the lawyers in
 4 Louisiana?
 5 A. I would have to read the parameters,
 6 sir. I do not know.
 7 Q. Sitting here, you don't know?
 8 A. I don't have it memorized, sir. No, I
 9 don't. I don't memorize them because every one
 10 is different. And I don't like to be caught
 11 without -- without reading the parameters on
 12 each and every claim I handle.
 13 Q. On this particular claim, who hired the
 14 lawyers?
 15 A. I do not know.
 16 Q. How about the fire claim?
 17 MR. MILLER:
 18 Objection. Now I'm going to
 19 instruct him not to answer that.
 20 He is not -- we are not talking
 21 about the fire claim, and you can bring that up
 22 in that case.
 23 MR. HOUGHTALING:
 24 We will.
 25 MR. MILLER:

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1 Okay.
 2 MR. HOUGHTALING:
 3 Sir?
 4 MR. MILLER:
 5 I said I'm instructing him not to --
 6 EXAMINATION BY MR. HOUGHTALING:
 7 Q. You have been involved --
 8 MR. MILLER:
 9 -- not to answer.
 10 EXAMINATION BY MR. HOUGHTALING:
 11 Q. You have been involved with Oceana. You
 12 are aware of Oceana because of the other claim
 13 you are involved with, correct?
 14 A. I do know there is another claim,
 15 correct.
 16 Q. Are you trained in policy
 17 interpretation?
 18 A. Yes, sir.
 19 Q. Tell me your background in training in
 20 policy interpretation.
 21 A. Well, with 35 years in this industry,
 22 sir, I have my CPCU. I have my AIC. I have
 23 part of my SCLA.
 24 I have been a manager on and off in the
 25 industry since 2000 -- no, since 1998. I review

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1 policies on a daily basis, and I have my
 2 adjusters -- verify that my adjusters are making
 3 correct coverage calls, sir.
 4 Q. Okay. What is the CPCU?
 5 A. Chartered property casualty underwriter.
 6 Q. Okay. And tell me about -- tell me
 7 about the training in particular that you got on
 8 policy interpretation.
 9 A. Well, you want me to go back to 1985
 10 when I went to my first class and I went -- you
 11 know, we read policies, personal policies, and
 12 interpreted them and reviewed how coverage goes
 13 from, you know, what is covered, and what items
 14 are covered to what items are not covered, what
 15 items are -- what losses are covered and what
 16 losses are not covered.
 17 Then, you know, you go to within the
 18 commercial lines, and then you learn -- then
 19 just through training and handling the numerous
 20 claims and going to different classes, you learn
 21 the nuances of every different policy and where
 22 coverage is afforded and coverage is not
 23 afforded, and how that all relates back to one
 24 another.
 25 Q. Can't you just do that by reading the

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1 policies themselves?
 2 A. It is all part of reading it and
 3 interpretation, sir, yes.
 4 Q. Well, so other than reading the policies
 5 themselves, you have gone to classes that help
 6 you interpret them, what you are reading,
 7 correct?
 8 A. Correct.
 9 MR. MILLER:
 10 Object to the form of the question.
 11 MR. HOUGHTALING:
 12 Sorry?
 13 THE WITNESS:
 14 I said correct.
 15 EXAMINATION BY MR. HOUGHTALING:
 16 Q. Okay. And what is --
 17 A. Because change -- because things change,
 18 sir, over time, right?
 19 Q. So what classes specifically have you
 20 gone to that help you interpret policies?
 21 A. All of the -- all of the 10 CPCU courses
 22 I took; the four AIC courses I have taken; the
 23 SCLA courses I have taken.
 24 I have been to numerous, numerous
 25 seminars and conferences. To enumerate them

<p style="text-align: right;">65</p> <p>1 all, I would not be able to do at this point. 2 Q. Is that training -- does that training 3 help you in interpreting the words that you are 4 reading? 5 A. Yes, sir. 6 Q. How? 7 A. Rephrase the question, please. 8 Q. How has the training helped you 9 interpret the words that you read in the 10 contracts? 11 MR. MILLER: 12 Object to the form of the question. 13 THE WITNESS: 14 Because there -- 15 MR. MILLER: 16 You can answer. 17 THE WITNESS: 18 -- it has shown you what -- what the 19 intentions were and how the courts have 20 interpreted the language over the last 30, 40, 21 however many years, and how the coverage -- the 22 courts have changed interpretations. 23 And it keeps you abreast of those 24 interpretations. So, you are handling the 25 claims within the general accepted</p>	<p style="text-align: right;">67</p> <p>1 necessary, review case law, yes, sir. 2 EXAMINATION BY MR. HOUGHTALING: 3 Q. Okay. And what in all of your training 4 has been helpful for understanding the intent of 5 the drafters of the policies? 6 A. Again, I am not understanding the 7 question. 8 Q. Okay. You said in your studies and 9 learning how to interpret the policies that you 10 read, that you learn about the intent. What do 11 you mean by that? 12 A. What do I mean by that? I believe that, 13 you know, courts have decided in the past, you 14 know, that when they have interpreted -- when 15 these have gone to court, that, you know, the 16 courts have interpreted and reached different 17 interpretations as to how the policy should be 18 read. And we have, therefore, used that in our 19 interpretation of coverage. 20 Q. Okay. And have you done any -- have you 21 had any training on the intent of the drafters 22 of those particular policies? 23 A. Can you rephrase that? 24 Q. Have you had any training on the intent 25 of the drafters of the policies?</p>
<p style="text-align: right;">66</p> <p>1 interpretations at the time. 2 EXAMINATION BY MR. HOUGHTALING: 3 Q. Other than you told me -- I think it was 4 two categories of things you I think you 5 addressed there. Let me see if I understand 6 correctly. 7 There are two parts of the training that 8 you have had on interpreting policies. One of 9 those is studying case law. I guess 10 interpretations, judicial interpretations; is 11 that correct? 12 A. You are breaking up. I can't hear you, 13 sir. 14 Q. Okay. So part of your training in 15 interpreting the words that you are reading is 16 to help you learn about case law of judges 17 interpreting the words of the contracts 18 themselves; the intent, correct? 19 Strike that. Let me rephrase it. 20 Part of the training you have had is to 21 look at case law, is that correct? 22 MR. MILLER: 23 Object to the form of the question. 24 THE WITNESS: 25 We will -- we will at times, when</p>	<p style="text-align: right;">68</p> <p>1 MR. MILLER: 2 Object to the form of the question. 3 THE WITNESS: 4 I don't remember. I don't remember. 5 EXAMINATION BY MR. HOUGHTALING: 6 Q. What is ISO? 7 A. I think it is Insurance Service Offices. 8 Q. And what is that? 9 A. I believe -- I am not sure of exactly 10 what they do. I believe they file -- they write 11 policies, but I don't know really what they do, 12 sir. I don't remember. 13 Q. In all of your training since 1985, you 14 have never had any particular lessons or 15 instructions on what ISO is? 16 A. I have, sir. Again, I said, I don't 17 remember their actual -- to give you the actual 18 definition, I would be unable to do. 19 Q. What do you know sitting here about ISO? 20 A. I would be -- I'm trying to come up with 21 the right term. They are -- they come up with 22 general use forms that some of the carriers use 23 and have been approved by the states. 24 Q. Oh, so do you know whether or not ISO 25 works with regulators on policy forms and</p>

69	<p>1 language for policies? 2 A. I believe they file with the regulators 3 and the regulators -- again, I am not privy to 4 that. I believe -- I am just -- what I believe 5 they do is they file with the states and then 6 the states -- they go back and forth with the 7 states. 8 Q. Do they give -- 9 A. I'm not -- 10 Q. Does ISO ever give explanations of the 11 intent of their language? 12 A. They may -- 13 MR. MILLER: 14 I am going to object to the line of 15 questioning. It doesn't fit into anything that 16 this witness is being tendered to testify to. 17 MR. HOUGHTALING: 18 He says -- he says he interprets 19 policies. He has had training on it. 20 EXAMINATION BY MR. HOUGHTALING: 21 Q. Right? 22 A. What ISO does, sir, I don't know. 23 Q. Okay. That is fine. 24 A. Other than that they write general 25 policies and they submit them to the carriers</p>	71	<p>1 interpretation that you are familiar with? 2 MR. MILLER: 3 Object to the form of the question. 4 THE WITNESS: 5 I am not sure what you mean by that. 6 MR. MILLER: 7 Right. Me, either. 8 EXAMINATION BY MR. HOUGHTALING: 9 Q. Okay. In interpreting policies, would 10 you agree that exclusions are to be interpreted 11 narrowly? 12 MR. MILLER: 13 Objection. Objection. You are 14 asking the witness for a legal conclusion, which 15 he is not capable of answering. 16 MR. HOUGHTALING: 17 I'm asking for his -- the witness 18 has testified that since 1985, he has 19 interpreted and given instructions to adjusters 20 on the interpretations of policies, and in 21 policy interpretation of its language. 22 EXAMINATION BY MR. HOUGHTALING: 23 Q. So I am asking you, sir: Do you follow 24 any insurance principle that exclusions are to 25 be interpreted narrowly?</p>
70	<p>1 and the carriers then decide whether or not they 2 are going to use them. That is all I know about 3 ISO, sir. 4 Q. Okay. Do you know anything about ISO's 5 correspondence with regards to business 6 interruption policies in this matter? 7 A. In the course -- I'm not sure what you 8 mean by correspondence. 9 Q. Okay. Do you know if ISO had any 10 correspondence with the state of Louisiana on 11 the policy forms at issue in this matter? 12 A. I would have no idea about that, sir. 13 Q. You were involved in the insurance 14 business in 2002? 15 A. No, I didn't say -- I said since 1985, 16 sir. 17 Q. Yeah. So 2002, 2000, you were around 18 during SARS? 19 A. I remember SARS. I don't remember ever 20 having a claim about SARS. 21 Q. Did you handle anything in Asia? 22 A. I'm sorry. 23 Q. Did you handle anything in Asia? 24 A. No, I do not. 25 Q. Is there any principles of policy</p>	72	<p>1 A. I -- I apply the exclusion as it is 2 written, sir. 3 Q. So you can't say that you apply the 4 principle to be interpreted narrowly? 5 MR. MILLER: 6 Objection. 7 THE WITNESS: 8 I interpret -- 9 MR. MILLER: 10 Asked and answered. 11 THE WITNESS: 12 I don't know how else to answer 13 that. 14 EXAMINATION BY MR. HOUGHTALING: 15 Q. What if the exclusion is ambiguous? 16 Then what happens? One way I can read it 17 reasonably to find that it excludes something 18 and one reasonable interpretation, it includes 19 it. How do you handle that? 20 A. If it is a claim that needs it, I will 21 refer with counsel and just have a coverage 22 conversation with counsel, sir. 23 Q. Okay. That is what you do, you go to a 24 lawyer in that instance? 25 A. In some cases, yes, sir.</p>

73	<p>1 Q. Is that what you did here?</p> <p>2 A. No, sir. I don't -- I don't know how</p> <p>3 they came up with the coverage determination on</p> <p>4 this, other than the question that was answered,</p> <p>5 it didn't fit coverage and, therefore, the claim</p> <p>6 was denied.</p> <p>7 Q. Who told you it didn't fit coverage?</p> <p>8 A. I don't know who did that.</p> <p>9 Q. You didn't make that determination?</p> <p>10 A. I am sorry?</p> <p>11 Q. You didn't make that determination, did</p> <p>12 you?</p> <p>13 A. My adjuster made that determination in</p> <p>14 the proper handling of this claim.</p> <p>15 Q. Oh, your adjuster made that</p> <p>16 interpretation. Who made the determination that</p> <p>17 there was no coverage in this matter?</p> <p>18 A. Again, I answered that.</p> <p>19 Q. I'm sorry. I am not clear. Who made</p> <p>20 the coverage determination in this matter?</p> <p>21 A. My adjuster would have made that</p> <p>22 coverage determination corresponding with the</p> <p>23 markets involved.</p> <p>24 Q. Did anyone in your company make that</p> <p>25 determination?</p>	75	<p>1 A. It was not.</p> <p>2 Q. The coverage decision was made</p> <p>3 afterwards?</p> <p>4 A. The coverage decision would have been</p> <p>5 made after a formal -- a formal investigation</p> <p>6 into the claim.</p> <p>7 Q. What formal investigation was made into</p> <p>8 this claim?</p> <p>9 A. Again, I am not privy to all the ins and</p> <p>10 outs, but I know that the questionnaire was sent</p> <p>11 out, a Reservation of Rights was sent out, and a</p> <p>12 proper denial was sent out.</p> <p>13 Q. Did the Certain Underwriters or your</p> <p>14 company perform any investigation, other than</p> <p>15 sending out a questionnaire?</p> <p>16 MR. MILLER:</p> <p>17 Object to the form of the question.</p> <p>18 It assumes facts not in evidence.</p> <p>19 THE WITNESS:</p> <p>20 Can you ask that again, please?</p> <p>21 EXAMINATION BY MR. HOUGHTALING:</p> <p>22 Q. Did your company working for Certain</p> <p>23 Underwriters do any affirmative investigation on</p> <p>24 this matter, other than sending out a</p> <p>25 questionnaire?</p>
74	<p>1 MR. MILLER:</p> <p>2 Objection to the form of the</p> <p>3 question.</p> <p>4 THE WITNESS:</p> <p>5 I am not sure what -- all I can say</p> <p>6 is we will on any denial -- on any denial that</p> <p>7 comes out of this office, sir, we will refer</p> <p>8 out. With anybody, whoever the client is, we</p> <p>9 discuss it with the client before the denial</p> <p>10 goes out.</p> <p>11 EXAMINATION BY MR. HOUGHTALING:</p> <p>12 Q. Do you know if that happened in this</p> <p>13 case?</p> <p>14 A. Yes.</p> <p>15 Q. And how did that happen?</p> <p>16 A. I was not privy to that discussion, so I</p> <p>17 don't know how that happened. I assume it</p> <p>18 happened via Emails.</p> <p>19 Q. Okay. You reviewed the claim file,</p> <p>20 correct?</p> <p>21 A. Yes, sir.</p> <p>22 Q. Do you know if --</p> <p>23 A. Again --</p> <p>24 Q. -- the coverage decision was made before</p> <p>25 or after the phone call you referred to?</p>	76	<p>1 MR. MILLER:</p> <p>2 Same objection.</p> <p>3 THE WITNESS:</p> <p>4 I don't know what other -- I don't</p> <p>5 know particularly what other investigation was</p> <p>6 done on this claim, sir.</p> <p>7 EXAMINATION BY MR. HOUGHTALING:</p> <p>8 Q. Well, you said after proper</p> <p>9 investigation. So I am asking you: What</p> <p>10 investigation was done?</p> <p>11 A. I'm assuming -- what I meant -- can I go</p> <p>12 back and answer -- rephrase or --</p> <p>13 Q. Sure. Sure. You can correct your</p> <p>14 answer. And any time if you answer something</p> <p>15 and you want to correct it or you say something</p> <p>16 was wrong, no problem.</p> <p>17 A. I believe that my response was that the</p> <p>18 adjuster on the claim did the investigation as</p> <p>19 directed by the market, and then reviewed it</p> <p>20 with the market to get a decision on coverage,</p> <p>21 sir.</p> <p>22 Q. When you say --</p> <p>23 A. Like the actual -- what all that</p> <p>24 pertained, I don't remember offhand. I can look</p> <p>25 it up and get back to you.</p>

<p style="text-align: right;">77</p> <p>1 Q. When you say, "by the market," who are 2 you referring to? 3 A. The carriers involved. 4 Q. You refer to them as the "market"? 5 A. Yes, sir. 6 Q. Are you familiar with any principle that 7 the insurance company must resolve doubt 8 concerning coverages in favor of the 9 policyholder? 10 A. I am sorry? 11 Q. Are you familiar with any interpretation 12 that insurance companies must resolve doubts 13 concerning coverage in favor of the 14 policyholder? 15 A. I am not familiar with anything based on 16 that wording. No, sir. 17 Q. Anything of similar principle that you 18 are familiar with? 19 A. I know it is a -- I know it is a 20 contract of adhesion. 21 Q. Describe what you mean by that. 22 A. In a contract of adhesion, when one 23 person writes it, the ambiguity, you know, would 24 be decided on behalf of the insured. 25 Q. Okay. And in this matter, who wrote the</p>	<p style="text-align: right;">79</p> <p>1 EXAMINATION BY MR. HOUGHTALING: 2 Q. Do you know that, sitting here today? 3 A. I just -- I said I do not remember, sir. 4 Q. I'm not asking you to remember the phone 5 call. I am asking you, sitting here today -- 6 well, strike that. 7 You are adjusting claims for Certain 8 Underwriters, so you are involved in the 9 adjustment of certain claims that are ongoing 10 now in Louisiana, are you not? 11 A. Correct. 12 Q. COVID claims, correct? 13 A. Correct. I am involved in other claims, 14 correct. 15 Q. Now, are you aware that some of those 16 policies have specific virus exclusions and some 17 do not? 18 A. I am -- 19 MR. MILLER: 20 Objection. 21 THE WITNESS: 22 I do not -- I am not aware of that, 23 sir. 24 EXAMINATION BY MR. HOUGHTALING: 25 Q. Is this the first you are hearing of</p>
<p style="text-align: right;">78</p> <p>1 policy issued? 2 A. I don't know, sir. I would have to look 3 at it. 4 Q. Do you whether or not it was the 5 policyholder? 6 A. Oh, no, the policyholder did not write 7 the policy. 8 Q. The policy was written by ISO, correct? 9 A. Again, without looking at it, I don't 10 know offhand. 11 Q. The language of the policy was chosen by 12 Certain Underwriters, you would gather, correct? 13 A. I don't know that. 14 Q. On the phone call that you had, you were 15 talking about several claims that Certain 16 Underwriters had that you were involved with, 17 correct? 18 A. Correct. 19 Q. Was there any discussion with regard to 20 the fact that some of those Certain Underwriters 21 had buyer's exclusions and others did not? 22 MR. MILLER: 23 Objection. 24 THE WITNESS: 25 I don't remember.</p>	<p style="text-align: right;">80</p> <p>1 that? 2 A. I don't know it to be a fact, sir. 3 Q. Do you know whether or not this policy 4 had a virus exclusion? 5 A. I believe it does, yes, sir. 6 Q. You believe it does? 7 A. No, no. Wait. I'm sorry. Let me 8 strike that. No, it did not. 9 Q. This did not have a virus exclusion? 10 A. No. 11 Q. What is the significance of that? 12 MR. MILLER: 13 Objection to the form of the 14 question. 15 MR. HOUGHTALING: 16 You can answer. 17 THE WITNESS: 18 I am trying to come up with the 19 answer. Can you ask that again? 20 EXAMINATION BY MR. HOUGHTALING: 21 Q. What is the significance of the fact 22 that it does not have a virus exclusion? 23 MR. MILLER: 24 Objection to the form. Assumes 25 facts that are not in evidence.</p>

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1 THE WITNESS:
 2 Without looking at it again, for a
 3 while, I wouldn't be able to answer the specific
 4 significance of that --
 5 EXAMINATION BY MR. HOUGHTALING:
 6 Q. Do you --
 7 A. -- the significance regarding the facts
 8 of this loss.
 9 Q. So you, sitting here today, you can't
 10 tell me whether or not it is significant that
 11 this policy does not have a virus exclusion?
 12 A. I am saying that I would need to -- I
 13 would need to review the claim, sir.
 14 Q. Well, you have already testified that
 15 you believe you have reviewed it and you believe
 16 it does not have a virus exclusion, correct?
 17 A. Yes.
 18 Q. Does that have any significance to you
 19 in the adjustment of this claim?
 20 A. No.
 21 MR. HOUGHTALING:
 22 Give me one second. We might be
 23 wrapping up here.
 24 (Brief recess held.)
 25 EXAMINATION BY MR. HOUGHTALING:

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1 Q. Mr. Donoian, do you know if viral
 2 decontamination expenses are covered under this
 3 policy?
 4 MR. MILLER:
 5 Objection to the form of the
 6 question.
 7 THE WITNESS:
 8 And I didn't understand what the
 9 question was.
 10 EXAMINATION BY MR. HOUGHTALING:
 11 Q. Do you know if viral decontamination
 12 costs are covered in this policy?
 13 A. Not without reading the policy, sir.
 14 Q. Have you read the policy before?
 15 A. You broke up, sir.
 16 Q. Have you read the policy before?
 17 A. I have not read this specific policy,
 18 sir.
 19 MR. HOUGHTALING:
 20 Thank you. No further questions,
 21 sir.
 22 Okay. Allen, do you have your next
 23 witness?
 24 MR. MILLER:
 25 Yeah. Give me about five minutes.

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1 MR. HOUGHTALING:
 2 Sure.
 3 (Deposition concluded at 4:28 p.m.)
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1 WITNESS' ATTESTATION
 2 I have read or have had the foregoing
 3 testimony read to me, pursuant to Rule 30(e) of
 4 the Federal Rules of Civil Procedure and/or
 5 Article 1445 of the Louisiana Code Civil
 6 Procedure, and hereby attest that, to the best
 7 of my ability and understanding, it is a true
 8 and correct transcription of my testimony, with
 9 the exception of any attached corrections or
 10 changes, complete with reasons for changes, on
 11 the Witness' Amendment Pages;
 12 I have in no way altered the printed
 13 transcript pages containing testimony herein,
 14 tampered with the seal on the last numbered page
 15 herein, or tampered with the security strip on
 16 the binder hereof. The integrity of this
 17 certified transcript has been maintained in the
 18 identical form as it was received by me, with
 19 the exception of any changes on the Witness'
 20 Amendment Pages.
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 23 Date
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 GREGORY DONOIAN
 (Signature)

1 REPORTER'S PAGE

2 I, KAY E. DONNELLY, Certified Court
3 Reporter in and for the State of Louisiana, the
4 officer, as defined in Rule 28 of the Federal
5 Rules of Civil Procedure and/or Article 1434(B)
6 of the Louisiana Code of Civil Procedure, before
7 whom this proceeding was taken, do hereby state
8 on the Record:

9 That due to the interaction in the
10 spontaneous discourse of this proceeding, dashes
11 (--) have been used to indicate pauses, changes
12 in thought, and/or talkovers; that same is the
13 proper method for a Court Reporter's
14 transcription of proceeding, and that the dashes
15 (--) do not indicate that words or phrases have
16 been left out of this transcript;

17 That any words and/or names which could
18 not be verified through reference material have
19 been denoted with the phrased "(spelled
20 phonetically)."
21

22 _____
KAY E. DONNELLY
23 Certified Court Reporter
State of Louisiana
Certificate No. 87008
24
25

1 C E R T I F I C A T E

2 This certification is valid only for a
3 transcript accompanied by my original signature
4 and original required seal on this page.

5 I, KAY E. DONNELLY, Certified Court
6 Reporter in and for the State of Louisiana, as
7 the officer before whom this testimony was
8 taken, do hereby certify that GREGORY DONOIAN,
9 to whom oath was administered, after having been
10 duly sworn by me upon authority of R.S. 37:2554,
11 did testify as hereinbefore set forth in the
12 foregoing eighty-five (85) pages; that this
13 testimony was reported by me in the stenotype
14 reporting method, was prepared and transcribed
15 by me or under my personal direction and
16 supervision, and is a true and correct
17 transcript to the best of my ability and
18 understanding; that the transcript has been
19 prepared in compliance with transcript format
20 guidelines required by statute or by rules of
21 the board; and that I am informed about the
22 complete arrangement, financial or otherwise,
23 with the person or entity making arrangements
24 for deposition services; that I have acted in
25 compliance with the prohibition on contractual
relationships, as defined by Louisiana Code of
Civil Procedure Article 1434 and in rules and
advisory opinions of the board; that I have no
actual acknowledge of any prohibited employment
or contractual relationship, direct or indirect,
between a court reporting firm and any party
litigant in this matter nor is there any such
relationship between myself and a party litigant
in this matter. I am not related to counsel or
to the parties herein, nor am I otherwise
interested in the outcome of this matter.
20
21

22 _____
KAY E. DONNELLY
23 Certified Court Reporter
State of Louisiana
Certificate No. 87008
24 November 10, 2020
25

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