

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF LOUISIANA

DORIAN THEODORE	:	CIVIL ACTION NO.: 3:22-CV-00951
	:	
	:	JUDGE SHELLY D. DICK
VERSUS	:	
	:	MAG. JUDGE
	:	RICHARD L. BOURGEOIS, JR
ALLIED TRUST INSURANCE	:	
COMPANY	:	

PLAINTIFF’S PROPOSED UMPIRE SUBMISSION

NOW INTO COURT, through undersigned counsel, comes Plaintiff, Dorian Theodore (hereinafter “Plaintiff”), who submits this list of Proposed Umpires as ordered by this court following the Motion to Appoint Umpire. The following individuals, proposed by Plaintiff’s appraiser, Mike Deckelman, are all neutral and qualified umpires:

1. Joel Moore

Qualifications: Mr. Moore has been appointed by various United States District Courts to serve as Umpire on multiple occasions. He is a certified appraiser and umpire for complex large losses in multiple jurisdictions.¹

2. Cade Cole

Qualifications: Mr. Cole has been appointed by the United States District Court for Western Louisiana as Special Master for Hurricane Cases. Additionally, he serves as Special Mater for Hurricane cases in various state courts throughout Louisiana.

3. Jeffery Jennings

Qualifications: Mr. Jennings has served as umpire for complex large losses in multiple jurisdictions. Mr. Jennings’ extensive background in construction, engineering, insurance claims, and appraisals, makes him unique in his level of expertise as an umpire.²

¹ Exhibit 1: CV of Joel Moore

² Exhibit 2: CV of Jeffery Jennings

WHEREFORE, for the reasons set forth in the Motion to Appoint Umpire and Memorandum in Support, Plaintiff respectfully requests this Honorable Court select one of the individuals submitted by the Plaintiff or Defendant to serve as umpire for the appraisal process on the Property Damage coverage of the Policy to be completed within thirty (30) days.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on the 18th day of August, 2023, the foregoing pleading was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to counsel of record registered to receive electronic service by operation of the Court's electronic filing system.

David B. Wheeler
DAVID B. WHEELER