
From: [REDACTED]@cinfin.com>
Sent: Tuesday, March 5, 2024 2:45 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Claim #:

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[REDACTED],

As a follow-up to my voice message, my apologies regarding the comment about the Policy being part of our Work Product.

A certified copy of the Policy has been ordered, and once received I will forward via email.

Thanks,

[REDACTED], AIC
Senior Claims Specialist
The Cincinnati Insurance Company

[REDACTED]

[REDACTED]

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From: [REDACTED]@merlinlawgroup.com>
Sent: Tuesday, March 5, 2024 1:23 PM
To: [REDACTED]@cinfin.com>
Cc: [REDACTED]@merlinlawgroup.com>
Subject: RE: Claim #: [REDACTED]

Mr. [REDACTED],

I am truly puzzled by your response – this is the first time in my career that an insurance company has refused to provide a copy of the insurance policy agreement and applicable endorsements. This is even more surprising from an experienced claims adjusters with an Associate in Claims insurance designation – one of the highest insurance designations that can be obtained, and which trained you on good faith insurance claim handling standards.

Work product is a legal concept meant to exempt from discovery documents and tangible things prepared in anticipation of litigation or for trial. Its purpose is to give attorneys a certain degree of privacy, free from unnecessary intrusion by opposing parties and their counsel. A document is protected by the work product privilege if it was **prepared in anticipation of litigation** by another party or that party's representative, and was **intended to remain confidential**.

The insurance policy I have requested is an agreement between Cincinnati Insurance Company and your insured, [REDACTED]. It outlines the coverage promises Cincinnati made to [REDACTED] in exchange for the thousands of dollars in premiums receive. It was certainly not prepared in anticipation of litigation and was not intended to remain confidential.

In addition to the months of training required to obtain your AIC insurance designation, I assume you have received training from Cincinnati on the insurance standards and regulations for the State of Iowa, including those required by Iowa Insurance Code Iowa Section 505B.2(e):

e. The insurer, upon request and without charge, must deliver a paper copy of the policy or endorsements to the insured by mail.

I am again asking you to provide me with a certified copy of the insurance policy and applicable endorsement which you are using to adjust the loss. If I do not receive a complete copy of the insurance policy by the **close of business on Friday**, my client will seek the assistance of the Iowa Insurance Division.

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Connect with us:    

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██████████

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From: ██████████@cinfin.com>
Sent: Tuesday, March 5, 2024 11:44 AM
To: ██████████@merlinlawgroup.com>
Cc: ██████████ <SHall@merlinlawgroup.com>
Subject: RE: Claim #: ██████████

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The Policy is our work Product and cannot be shared. Your client has the Policy, and can provide you with a copy of same.

Thanks,

██████████, AIC
Senior Claims Specialist
The Cincinnati Insurance Company

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From: ██████████@merlinlawgroup.com>
Sent: Tuesday, March 5, 2024 10:35 AM
To: ██████████@cinfin.com>

Cc: [REDACTED]@merlinlawgroup.com>
Subject: RE: Claim #: [REDACTED]

Mr. [REDACTED],

The certified insurance policy will outline the coverage agreement, the coverages afforded, and any applicable endorsements with expand or narrow coverage. I need an understanding of these coverage agreements to confirm your analysis and amounts paid. The insurance policy also sets forth the deadline for filing legal action relating to the claim.

Please confirm that you will promptly produce a certified copy of the insurance policy with all applicable endorsements.

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From: [REDACTED]@cinfin.com>
Sent: Tuesday, March 5, 2024 8:59 AM
To: [REDACTED].com>
Cc: [REDACTED]@merlinlawgroup.com>
Subject: RE: Claim #: [REDACTED]

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[REDACTED],

Why do you need a certified copy of the insurance policy including all applicable endorsements?

Thanks,

[REDACTED], AIC
Senior Claims Specialist
The Cincinnati Insurance Company

[REDACTED]

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From: [REDACTED]@merlinlawgroup.com>
Sent: Tuesday, March 5, 2024 9:50 AM
To: [REDACTED]@cinfin.com>

Cc: [REDACTED]@merlinlawgroup.com>
Subject: RE: [REDACTED]

Mr. [REDACTED],

Thank you for your message. I will discuss with the client and circle back with you.

In the meantime, would you please produce a certified copy of the insurance policy including all applicable endorsements.

Thank you.

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]