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LOS ANGELES, CALIFORNIA 90067
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FACSIMILE TRANSMITTAL SHEET

To: CORNWELL & SAMPLE, LLP
Date: July 24, 2015
Attention: Stephen R. Cornwell, Esq.
Facsimile No.: (559) 447-0747
Troubleshoot
Phone No.: (559) 431-3142
Regarding: *LeDuc, Cal, et al. vs. General Motors LLC,
et al.*
From: Mark R. Israel, Esq.
File No.: 2890.044
Notes:

TOTAL OF 14 PAGES (INCLUDING TRANSMITTAL SHEET)

CONFIDENTIALITY NOTICE

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LP0000507

DANIELS, FINE, ISRAEL, SCHONBUCH & LEOVITS, LLP

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MARK R. ISRAEL
Partner

E-MAIL
Israel@dfis-law.com

July 24, 2015

Via Facsimile & Email

Stephen R. Cornwell, Esq.
Cornwell & Sample, LLP
7045 North Fruit Avenue
Fresno, California 93711-0761

Re: *LeDuc, Cal, et al. vs. General Motors LLC, et al.*
Case No. : 13CE CG 03811 MWS
Our File No. : 2890.044

Dear Mr. Cornwell:

The undersigned is counsel to Infinity Insurance Company in connection with the lawsuit entitled *LeDuc, et al. v. General Motors LLC, et al.*, Fresno County Superior Court Case No. 13 CE CG 03811 NWS. As you know, Infinity is the liability insurer of defendant Mario Guerra. Although Infinity was not served directly, we have been advised by Academy West Insurance Services, Inc. ("Academy West") that your office has served a deposition subpoena for production of business records with a July 25, 2015 production date and a deposition subpoena for personal appearance for production of documents and things with an appearance date of August 17, 2015. Those depositions subpoenas seeks documents and information in which Infinity has a confidential and proprietary interest. Consequently, Infinity objects to production of Category 1 of Attachment 3 to your July 25, 2015 deposition subpoena and to all categories of production on Attachment 3 and 4 of your August 17, 2015 deposition subpoena. Aside from the fact that these documents and information requests seek information which is confidential between Infinity and its agents, your request exceeds the permissible scope of discovery in a tort lawsuit in California. Code of Civil Procedure section 2017.210 specifies the information to which a litigation party is entitled to concerning insurance as follows:

§ 2017.210. Information concerning insurance

A party may obtain discovery of the existence and contents of any agreement under which any insurance carrier may be liable to satisfy in whole or in part a judgment that may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment. This discovery may include the identity of the carrier and the nature and limits of the coverage. A party may also obtain

Stephen R. Cornwell, Esq.
July 24, 2015
Page 2

discovery as to whether that insurance carrier is disputing the agreement's coverage of the claim involved in the action, but not as to the nature and substance of that dispute. Information concerning the insurance agreement is not by reason of disclosure admissible in evidence at trial.

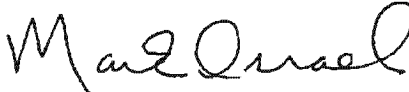
C.C.P. section 2017.210 and its predecessor are generally interpreted as permitting discovery of the identity of the defendant's insurance carrier and the policy limits. Production of the insurance policy itself may be compelled by request for production of documents. (*Irvington-Moore, Inc. v. Superior Court (Jordan)* (1003) 14 Cal.App.4th 733, 741.) However, burdensome discovery requests directed at third parties are not permitted by the statute. (See generally, *Catholic Mutual Relief Society v. Superior Court* (2007) 42 Cal.4th 358, 368.)

It is my understanding that you already have a copy of the relevant insurance policy as well as *all* iterations of the declaration pages that went with it. That is all you are entitled to. Copies of Academy West's contracts with Infinity are not relevant to the insurance policy and policy limits available to Mr. Guerra. Access to the Infinity website and printouts and screen shots from the Infinity website are far beyond any scope of discovery permitted by C.C.P. section 2017.021 and relevant case law.

Therefore, Infinity objects to production of these documents and this information. Please confirm your withdrawal of these requests, otherwise, Infinity must proceed with a motion to quash. If you wish to discuss these matters, please do not hesitate to contact me.

Very truly yours,

DANIELS, FINE, ISRAEL
SCHONBUCH & LEBOVITS, LLP



Mark R. Israel

MRI:cet:2890-044.sc01.docx

Dictated: 07/24/15

cc: Dan Bruce, Esq. (DBruce@NZ-law.com)
Infinity Insurance Company

SUBP-010

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Stephen R. Cornwell, CA Bar #40737 CORNWELL & SAMPLE, LLP 7045 N. Fruit Avenue Fresno, CA 93711 TELEPHONE NO.: (559) 431-3142 FAX NO.: E-MAIL ADDRESS: ATTORNEY FOR (Name): Plaintiffs CAL LeDUC, et al.	FOR COURT USE ONLY CASE NUMBER 13 CE CG 03811 MWS
SUPERIOR COURT OF CALIFORNIA, COUNTY OF FRESNO STREET ADDRESS: 1130 "O" Street MAILING ADDRESS: CITY AND ZIP CODE: Fresno, CA 93724 BRANCH NAME: B.F. Sisk Courthouse	
PLAINTIFF/PETITIONER: CAL LeDUC, et al. DEFENDANT/RESPONDENT: GENERAL MOTORS CORPORATION, et al.	
DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS	

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):

ACADEMY WEST INSURANCE SERVICES, INC.

5510 E. Kings Canyon Road, Fresno, CA 93727

(559) 981-5333

1. YOU ARE ORDERED TO PRODUCE THE BUSINESS RECORDS described in item 3, as follows:

To (name of deposition officer): First Legal Network On (date): July 25, 2015 Location (address): 2300 Tulare Street, Suite 130, Fresno, CA 93721	At (time): 10:00 a.m. (559) 233-1993
Do not release the requested records to the deposition officer prior to the date and time stated above.	

- ☒ by delivering a true, legible, and durable copy of the business records described in item 3, enclosed in a sealed inner wrapper with the title and number of the action, name of witness, and date of subpoena clearly written on it. The inner wrapper shall then be enclosed in an outer envelope or wrapper, sealed, and mailed to the deposition officer at the address in item 1.
 - ☐ by delivering a true, legible, and durable copy of the business records described in item 3 to the deposition officer at the witness's address, on receipt of payment in cash or by check of the reasonable costs of preparing the copy, as determined under Evidence Code section 1563(b).
 - ☐ by making the original business records described in item 3 available for inspection at your business address by the attorney's representative and permitting copying at your business address under reasonable conditions during normal business hours.
2. The records are to be produced by the date and time shown in item 1 (but not sooner than 20 days after the issuance of the deposition subpoena, or 15 days after service, whichever date is later). Reasonable costs of locating records, making them available or copying them, and postage, if any, are recoverable as set forth in Evidence Code section 1563(b). The records shall be accompanied by an affidavit of the custodian or other qualified witness pursuant to Evidence Code section 1561.
3. The records to be produced are described as follows (if electronically stored information is demanded, the form or forms in which each type of information is to be produced may be specified):

☒ Continued on Attachment 3.

4. IF YOU HAVE BEEN SERVED WITH THIS SUBPOENA AS A CUSTODIAN OF CONSUMER OR EMPLOYEE RECORDS UNDER CODE OF CIVIL PROCEDURE SECTION 1985.3 OR 1985.6 AND A MOTION TO QUASH OR AN OBJECTION HAS BEEN SERVED ON YOU, A COURT ORDER OR AGREEMENT OF THE PARTIES, WITNESSES, AND CONSUMER OR EMPLOYEE AFFECTED MUST BE OBTAINED BEFORE YOU ARE REQUIRED TO PRODUCE CONSUMER OR EMPLOYEE RECORDS.

DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF FIVE HUNDRED DOLLARS AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.

Date issued: June 10, 2015

Stephen R. Cornwell
(TYPE OR PRINT NAME)

(SIGNATURE OF PERSON ISSUING SUBPOENA)

Attorney at Law
(TITLE)

(Proof of service on reverse)

Page 1 of 2

LP0000510

SUBP-025

PLAINTIFF/PETITIONER: CAL LeDUC, et al.	CASE NUMBER:
DEFENDANT/RESPONDENT: GENERAL MOTORS CORPORATION, et al.	13 CE CG 03811 MWS

PROOF OF SERVICE OF NOTICE TO CONSUMER OR EMPLOYEE AND OBJECTION

(Code Civ. Proc., §§ 1985.3, 1985.6)

☐ Personal Service ☒ Mail

1. At the time of service I was at least 18 years of age and not a party to this legal action.

2. I served a copy of the Notice to Consumer or Employee and Objection as follows (check either a or b):

a. ☐ Personal service. I personally delivered the Notice to Consumer or Employee and Objection as follows:

(1) Name of person served:

(3) Date served:

(2) Address where served:

(4) Time served:

b. ☒ Mail. I deposited the Notice to Consumer or Employee and Objection in the United States mail, in a sealed envelope with postage fully prepaid. The envelope was addressed as follows:

(i) Name of person served: Ulysses Gonzalez

(3) Date of mailing: June 16, 2015

(2) Address: 812 Rawson Avenue
Sanger, CA 93657-2843(4) Place of mailing (city and state):
Fresno, CA

(5) I am a resident of or employed in the county where the Notice to Consumer or Employee and Objection was mailed.

c. My residence or business address is (specify): 7045 N. Fruit Avenue, Fresno, CA 93711

d. My phone number is (specify): (559) 431-3142

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: June 16, 2015

Linda Cunha

(TYPE OR PRINT NAME OF PERSON WHO SERVED)



(SIGNATURE OF PERSON WHO SERVED)

PROOF OF SERVICE OF OBJECTION TO PRODUCTION OF RECORDS

(Code Civ. Proc., §§ 1985.3, 1985.6)

☐ Personal Service ☐ Mail

1. At the time of service I was at least 18 years of age and not a party to this legal action.

2. I served a copy of the Objection to Production of Records as follows (complete either a or b):

a. ON THE REQUESTING PARTY

(1) ☐ Personal service. I personally delivered the Objection to Production of Records as follows:

(i) Name of person served:

(iii) Date served:

(ii) Address where served:

(iv) Time served:

(2) ☐ Mail. I deposited the Objection to Production of Records in the United States mail, in a sealed envelope with postage fully prepaid. The envelope was addressed as follows:

(i) Name of person served:

(iii) Date of mailing:

(ii) Address:

(iv) Place of mailing (city and state):

(v) I am a resident of or employed in the county where the Objection to Production of Records was mailed.

b. ON THE WITNESS

(1) ☐ Personal service. I personally delivered the Objection to Production of Records as follows:

(i) Name of person served:

(iii) Date served:

(ii) Address where served:

(iv) Time served:

(2) ☐ Mail. I deposited the Objection to Production of Records in the United States mail, in a sealed envelope with postage fully prepaid. The envelope was addressed as follows:

(i) Name of person served:

(iii) Date of mailing:

(ii) Address:

(iv) Place of mailing (city and state):

(v) I am a resident of or employed in the county where the Objection to Production of Records was mailed.

3. My residence or business address is (specify):

4. My phone number is (specify):

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date:

(TYPE OR PRINT NAME OF PERSON WHO SERVED)

(SIGNATURE OF PERSON WHO SERVED)

SUBP-025 (Rev. January 1, 2009)

NOTICE TO CONSUMER OR EMPLOYEE AND OBJECTION

Page 2 of 2

LP0000511

PROOF OF SERVICE

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is 7045 N. Fruit Avenue, Fresno, California. On June 16, 2015, I served the within documents:

NOTICE TO CONSUMER OR EMPLOYEE AND OBJECTION and DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS

☐ **BY FAX:** by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m.

☐ **BY HAND:** by personally delivering the document(s) listed above to the person(s) at the address(es) set forth below.

☒ **BY MAIL:** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Fresno, California addressed as set forth below.

☐ **BY OVERNIGHT MAIL:** by causing document(s) to be picked up by an overnight delivery service company for delivery to the addressee(s) on the next business day.

☐ **BY PERSONAL DELIVERY:** by causing personal delivery by _____ of the document(s) listed above to the person(s) at the address(es) set forth below

Richard A. Belardinelli
GEORGESON AND BELARDINELLI
7060 N. Fresno Street, Suite 250
Fresno, CA 93720
Facsimile: (559) 447-0747

Ryan A. McCarthy
BOWMAN AND BROOKE LLP
1741 Technology Drive, Suite 200
San Jose, CA 95110
Facsimile: (408) 279-5845

David B. Weinstein
Philip McDaniel
WEINSTEIN TIPPETTS &
LITTLE LLP
7500 San Felipe, Suite 500
Houston, TX 77063
Facsimile: (713) 244-0801

Mark P. Robinson, Jr.
ROBINSON CALCAGNIE ROBINSON
SHAPIRO DAVIS, INC.
19 Corporate Plaza Drive
Newport Beach, CA 92660
Fax: (949) 720-1292

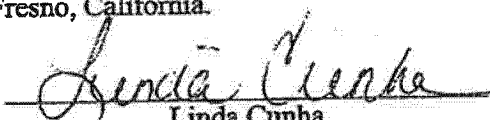
Joseph D. Cooper, Sr.
COOPER & COOPER
7519 N. Ingram Avenue, Suite 103
Fresno, CA 93711
Facsimile: (559) 442-1659

Gregory S. Mason
MCCORMICK BARSTOW
7647 N. Fresno Street
Fresno, CA 93720
Facsimile: (559) 433-2300

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on June 16, 2015, at Fresno, California.


Linda Cunha

DECLARATION OF CUSTODIAN OF RECORDS

() I HEREBY DECLARE under penalty of perjury that the following statements are true to the best of my knowledge and believe.

I am the duly authorized custodian of records of the below named and I certify that the accompanying records are true and complete copies of records maintained in the regular course and scope of business of my employer and were prepared by authorized personnel at or near the time of the acts, conditions or events which they intend to convey. As custodian, I testify to the records identity and method of preparation. The source of the information and method of preparation were such as to indicate their trustworthiness. If I were called as a witness in this matter, I could and would testify under oath to these facts. No documents, records or other things have been withheld except as noted below.

Certain records were omitted because _____

OR IN THE ALTERNATIVE:

() I HEREBY DECLARE under penalty of perjury that I have NO RECORDS concerning _____

Please explain if you have no records: _____

() I have no X-RAYS or other diagnostic films.

() I have no BILLING RECORDS.

Records subpoenaed from: _____

Case Name: _____

Concerning: _____

DOB: _____ SS#: _____

HOW ORIGINAL RECORDS WERE PREPARED:

() Handwritten notes

() Typed or data entered

() Transcribed

() Other: _____

Records were made during, or promptly after the act, condition or event reflected in such records.

Date

Signature of Custodian

Print Name

SUEP-020

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Stephen R. Cornwell, CA Bar #40737 CORNWELL & SAMPLE, LLP 7045 N. Fruit Avenue Fresno, CA 93711 TELEPHONE NO: (559) 431-3142 FAX NO. (Optional): E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name): Plaintiffs CAL LeDUC, et al.		FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF FRESNO STREET ADDRESS: 1130 "O" Street MAILING ADDRESS: CITY AND ZIP CODE: Fresno, CA 93724 BRANCH NAME: B.F. Sisk Courthouse		
PLAINTIFF/PETITIONER: CAL LeDUC, et al.		
DEFENDANT/RESPONDENT: GENERAL MOTORS CORPORATION, et al		
DEPOSITION SUBPOENA FOR PERSONAL APPEARANCE AND PRODUCTION OF DOCUMENTS AND THINGS		CASE NUMBER: 13 CE CG 03811 MWS

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):
ACADEMY WEST INSURANCE SERVICES, INC.

1. YOU ARE ORDERED TO APPEAR IN PERSON TO TESTIFY AS A WITNESS in this action at the following date, time, and place:

Date: August 17, 2015 Time: 10:00 am Address: 5510 E. Kings Canyon Road
Fresno CA 93727

- a. ☒ As a deponent who is not a natural person, you are ordered to designate one or more persons to testify on your behalf as to the matters described in item 4. (Code Civ. Proc., § 2025.230.)
- b. ☒ You are ordered to produce the documents and things described in item 3.
- c. ☐ This deposition will be recorded stenographically ☐ through the instant visual display of testimony and by ☐ audiotape ☐ videotape.
- d. ☐ This videotape deposition is intended for possible use at trial under Code of Civil Procedure section 2025.620(d).
2. The personal attendance of the custodian or other qualified witness and the production of the original records are required by this subpoena. The procedure authorized by Evidence Code sections 1560(b), 1561, and 1562 will not be deemed sufficient compliance with this subpoena.
3. The documents and things to be produced and any testing or sampling being sought are described as follows: SEE ATTACHMENT 3
- ☒ Continued on Attachment 3.
4. If the witness is a representative of a business or other entity, the matters upon which the witness is to be examined are described as follows: SEE ATTACHMENT 4
- ☒ Continued on Attachment 4.
5. IF YOU HAVE BEEN SERVED WITH THIS SUBPOENA AS A CUSTODIAN OF CONSUMER OR EMPLOYEE RECORDS UNDER CODE OF CIVIL PROCEDURE SECTION 1985.3 OR 1985.6 AND A MOTION TO QUASH OR AN OBJECTION HAS BEEN SERVED ON YOU, A COURT ORDER OR AGREEMENT OF THE PARTIES, WITNESSES, AND CONSUMER OR EMPLOYEE AFFECTED MUST BE OBTAINED BEFORE YOU ARE REQUIRED TO PRODUCE CONSUMER OR EMPLOYEE RECORDS.
6. At the deposition, you will be asked questions under oath. Questions and answers are recorded stenographically at the deposition; later they are transcribed for possible use at trial. You may read the written record and change any incorrect answers before you sign the deposition. You are entitled to receive witness fees and mileage actually traveled both ways. The money must be paid, at the option of the party giving notice of the deposition, either with service of this subpoena or at the time of the deposition. Unless the court orders or you agree otherwise, if you are being deposed as an individual, the deposition must take place within 75 miles of your residence or within 150 miles of your residence if the deposition will be taken within the county of the court where the action is pending. The location of the deposition for all deponents is governed by Code of Civil Procedure section 2025.250.

DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF \$500 AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.

Date issued: July 8, 2015

Stephen R. Cornwell, CA Bar #40737

Attorney at Law

1 (SIGNATURE OF PERSON ISSUING SUBPOENA)

Form Adopted for Mandatory Use
Judicial Council of California
SAFRA-020 (Rev. January 2009)

**DEPOSITION SUBPOENA FOR PERSONAL APPEARANCE
AND PRODUCTION OF DOCUMENTS AND THINGS**

CE Legal Solutions Plus

Code of Civil Procedure §§ 2020.510,
2025.220, 2025.230, 2025.250, 2025.620;
Government Code, § 68097.1

Page 1 of 2

LP0000515

LeDuc, et al., v. General Motors Corporation, et al.
Fresno County Superior Court Case No. 13CECG03811
Attachment to Deposition Subpoena for Personal Appearance and Production of
Documents and Things

Attachment 3

1. Access to the Infinity Insurance website for agents placing coverage on vehicles, including commercial vehicles.
2. Printouts and/or screen shots of the complete Infinity Insurance Company website including examination of all parts of the website that are available to agents for placement of commercial coverage as well as any instructions for the application of insurance on commercial vehicles. This is to include the downloading of the access and printing of all information on the website including screens for signup of commercial insurance, instructions on placing commercial insurance, insurance limits for commercial vehicles in California, the necessity of a motor carrier permit for commercial vehicles in California and all other information available on the Infinity Insurance Company website.
3. The inspection of the FSC Rater and copying of all screens and any other information regarding the placement of insurance on vehicles whether commercial or otherwise and particularly in California to make the FSC Rater available for inspection as to the manner in which commercial insurance may be shopped on the system.

LeDuc, et al., v. General Motors Corporation, et al.
Fresno County Superior Court Case No. 13CECG03811
Attachment to Deposition Subpoena for Personal Appearance and Production of
Documents and Things

Attachment 4

1. The Infinity Insurance Company website including all of those provisions available to agents for placement of commercial coverage on a vehicle as well as any instructions for the application of insurance on commercial vehicles.
2. The Infinity Insurance Company website instructions for the application of insurance on commercial vehicles.
3. The Infinity Insurance Company website provisions providing agents with information on minimum limits to be placed on commercial vehicles in California.
4. The FSC Rater service and any information regarding the placement of insurance on vehicles in California, whether commercial or otherwise, and the manner in which commercial insurance can be shopped on FSC Rater.

SUBP-025

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Stephen R. Cornwell, CA Bar #40737 CORNWELL & SAMPLE, LLP 7045 N. Fruit Avenue Fresno, CA 93711 TELEPHONE NO.: (559) 431-3142 FAX NO. (Optional): E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name): Plaintiffs CAL LeDUC, et al.		FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF FRESNO STREET ADDRESS: 1130 "O" Street MAILING ADDRESS: CITY AND ZIP CODE: Fresno, CA 93724 BRANCH NAME: B.F. Sisk Courthouse		
PLAINTIFF/PETITIONER: CAL LeDUC, et al. DEFENDANT/RESPONDENT: GENERAL MOTORS CORPORATION, et al.		CASE NUMBER: 13 CE CG 03811 MWS
NOTICE TO CONSUMER OR EMPLOYEE AND OBJECTION (Code Civ. Proc., §§ 1985.3, 1985.6)		

NOTICE TO CONSUMER OR EMPLOYEE

TO (name): **OLYSSSES GONZALEZ**

1. PLEASE TAKE NOTICE THAT REQUESTING PARTY (name): **Plaintiffs CAL LeDUC, et al.**
 SEEKS YOUR RECORDS FOR EXAMINATION by the parties to this action on (specify date): **July 25, 2015**
 The records are described in the subpoena directed to witness (specify name and address of person or entity from whom records are sought):
 A copy of the subpoena is attached.
2. IF YOU OBJECT to the production of these records, YOU MUST DO ONE OF THE FOLLOWING BEFORE THE DATE SPECIFIED. IN ITEM a. OR b. BELOW:
- If you are a party to the above-entitled action, you must file a motion pursuant to Code of Civil Procedure section 1987.1 to quash or modify the subpoena and give notice of that motion to the witness and the deposition officer named in the subpoena at least five days before the date set for production of the records.
 - If you are not a party to this action, you must serve on the requesting party and on the witness, before the date set for production of the records, a written objection that states the specific grounds on which production of such records should be prohibited. You may use the form below to object and state the grounds for your objection. You must complete the Proof of Service on the reverse side indicating whether you personally served or mailed the objection. The objection should not be filed with the court. **WARNING: IF YOUR OBJECTION IS NOT RECEIVED BEFORE THE DATE SPECIFIED IN ITEM 1, YOUR RECORDS MAY BE PRODUCED AND MAY BE AVAILABLE TO ALL PARTIES.**
3. YOU OR YOUR ATTORNEY MAY CONTACT THE UNDERSIGNED to determine whether an agreement can be reached in writing to cancel or limit the scope of the subpoena. If no such agreement is reached, and if you are not otherwise represented by an attorney in this action, YOU SHOULD CONSULT AN ATTORNEY TO ADVISE YOU OF YOUR RIGHTS OF PRIVACY.

Date: June 12, 2015Stephen R. Cornwell

(TYPE OR PRINT NAME)

(SIGNATURE OF

REQUESTING PARTY

☒

ATTORNEY)

OBJECTION BY NON-PARTY TO PRODUCTION OF RECORDS

1. ☐ I object to the production of all of my records specified in the subpoena.
2. ☐ I object only to the production of the following specified records:

3. The specific grounds for my objection are as follows:

Date:

(TYPE OR PRINT NAME)

(Proof of service on reverse)

(SIGNATURE)

Form Adopted for Mandatory Use
 Judicial Council of California
 SUBP-025 (Rev. January 1, 2008)

NOTICE TO CONSUMER OR EMPLOYEE AND OBJECTION

Legal
 Solutions
 & Plus

Page 1 of 2
 Code of Civil Procedure,
 §§ 1985.3, 1985.6,
 2020.010-202.510

LP0000518

LeDuc, et al., v. General Motors Corporation, et al.
Fresno County Superior Court Case No. 13CECG03811
Attachment to Deposition Subpoena for Production of Business Records

Attachment 3

1. A copy of the contract with Infinity Insurance Company in effect at any time from 2010 to the present.
2. Any and all documents, hard copy or scanned, relating to all insurance coverages placed for Mario A. Guerra at any time.
3. The personnel file of Ulysses Gonzalez, formerly working at your Orange Cove office.

FILED IN 13-0013 BY TOLANDISCOVERY SUBPOENA SACADEVY WEST INSURANCE SERVICES, INC. (CONTRACT AND GUERRA COVERAGE) ATTACHMENT 3.DOC

KAPETAN BROTHERS, LLP

June 11, 2015

Sent via Facsimile ONLY

Mark R. Israeli, Esq.
Daniels, Fine, Israel, Schonbuch & Lebovits, LLP
1801 Century Park East, Ninth Floor
Los Angeles, CA 90067

Mark P. Robinson, Jr., Esq.
Robinson Calcagnie Robinson Shapiro Davis, Inc.
19 Corporate Plaza Drive
Newport Beach, CA 92660

Vicki Hall
Infinity Select Insurance Company
Post Office Box 830807
Birmingham, AL 35283

Richard A. Belardinelli, Esq.
Georgeson & Belardinelli
7060 N. Fresno Street, Suite 250
Fresno, CA 93720

Gregory S. Mason, Esq.
McCormick Barstow
7647 N. Fresno Street
Fresno, CA 93720

Stephen Cornwell, Esq.
Cornwell & Sample
7045 North Fruit
Fresno, CA 93711

Vincent Galvin, Esq.
Ryan A. McCarthy, Esq.
Anne Hanna, Esq.
Bowman & Brooke, LLP.
1741 Technology Drive, Suite 200
San Jose, CA 95110

RE: *LeDuc, et al. v. General Motors LLC, et al.*
Infinity Insured: Mario Guerra
Claim No: 20001981033
Date of Loss: June 12, 2013
Case No: 13CECG03811

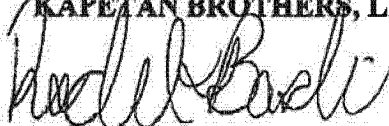
Dear Counsel:

This letter is to notify you that Kapetan Brothers, LLP will no longer be representing Mario Guerra, with respect to above-referenced matter, or any other matter.

Please contact our office if you have any questions.

Very truly yours,

KAPETAN BROTHERS, LLP.



Rachel Baskin, Paralegal to
Peter N. Kapetan, Esq.

1236 M Street • Fresno, CA 93721 • Phone 559.498.8000 • Fax 559.498.3784

www.KapetanBrothers.com

LP0000520

CORNWELL & SAMPLE, LLP

Stephen R. Cornwell
René Turner Sample

Attorneys At Law
7045 N. Fruit Avenue
Fresno, California 93711-0761

Telephone (559)431-3142
Facsimile (559)436-1135
www.cornwellsample.com

March 24, 2015

Joseph D. Cooper, Sr.
COOPER & COOPER
7519 N. Ingram Avenue, Suite 103
Fresno, CA 93711

Re: *LeDuc v. General Motors Corporation, et al.*

Dear Joe:

This confirms our conversation last week about the policy insuring Messrs. Guerra and Canchola. We discussed the policy insuring Guerra and Canchola for \$750,000. This was a private conversation and not in the way of any admissions in Court.

I think we both agree that the law in California requires that a commercial vehicle be insured for \$750,000. I think it is clear that Mr. Guerra's vehicle was his commercial vehicle and was being used in that manner that is to haul his own goods. And in fact that is exactly what Mr. Canchola was doing at the time of the incident.

The agent apparently wrote the policy for 25/50 whereas it is clear that under the law it is required to be \$750,000. After the damage to the vehicle, Mr. Guerra replaced that vehicle with another vehicle which weighed somewhat more than the crash vehicle. A new agent wrote substituted a new vehicle into the policy. The insurance carrier issued a certificate that that policy was for \$750,000 and had been since June 3, some days before the incident in question.

You indicated that I said in an earlier conversation I would accept the \$750,000 if offered. What I said then and reiterate now is I would have to speak to my clients and the referring attorney about it. It is not my decision to make alone.

LP0000521

Joseph D. Cooper, Sr.
March 24, 2015
Page 2

We are going to proceed with the depositions of the agents as I indicated.

Very truly yours,

Cornwell & Sample, LLP



Stephen R. Cornwell

SRC:yx

LP0000522

Joseph D. Cooper, Sr.

March 24, 2015

Page 3

bc: Richard A. Belardinelli

LP0000523

COOPER & COOPER

ATTORNEYS AT LAW

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Facsimile (559) 442-1659

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PMB 165
798 Lighthouse Avenue
Monterey, California 93940-1010
Telephone (831) 646-0330
Facsimile (831) 655-1426

November 24, 2014

File No. 70028.14

Stephen Cornwell, Esq.
Cornwell & Sample
7045 North Fruit
Fresno, CA 93711

Richard A. Belardinelli, Esq.
Georgeson & Belardinelli
7060 N. Fresno Street, Suite 250
Fresno, CA 93720

Gregory S. Mason, Esq.
McCormick Barstow
7647 N. Fresno Street
Fresno, CA 93720

Anne Hanna, Esq.
Bowman & Brooke, LLP
1741 Technology Drive, Suite 200
San Jose, CA 95110

Mark P. Robinson, Jr., Esq.
Robinson Calcagnie Robinson
Shapiro Davis, Inc.
19 Corporate Plaza Drive
Newport Beach, CA 92660

Re: ***LeDuc vs. General Motors, et al.***
Our Clients: Mario Guerra; Guerra Produce; Daniel Canchola

Dear Counsel:


As agreed, we have received and reviewed all documents produced by Academy West Insurance Services in response to Plaintiffs' subpoena. We have found no privileged documents to be located in the documents produced and have not removed or redacted any information from those documents. In total, 7 bates stamped pages were produced and true and correct copies of all pages are enclosed for your records.

All Counsel
Re: Guerra adv. Leuc
November 24, 2014
Page 2

Should you have any questions or concerns about the documents that are enclosed, do not hesitate to contact our office for assistance.

Very truly yours,

COOPER & COOPER



Valerie J. Velasco

VJV:sba
enclosures

First Records Retrieval

Subpoena Mobile Photocopy

1511 Beverly Blvd
Los Angeles, CA 90026
Phone: (877) 591-9979 Fax: (877) 823-7488

SHIP TO: COOPER & COOPER
VALERIE J. VELASCO
7519 N. Ingram Avenue, Suite 103
Fresno, CA 93711

WORK ORDER # 41743-01

MATTER # LEDUC V GENERAL MOTORS

CASE # 13 CE CG 03811 MWS

CASE NAME: CAL LEDUC, et al
vs
GENERAL MOTORS CORPORATION, et al

RECORDS ON: MARIO ALBERTO GUERRA LOPEZ AKA MARION A. GUERRA

FROM: ACADEMY WEST INSURANCE SERVICES
765 Anchor St.
Orange Cove, CA 93646

The undersigned certifies that he/she is an employee of a Professional Photocopier (Business and Professions Code Section 22450). I further certify that these records have been transmitted or distributed to authorized persons or entities only.

I declare under penalty of perjury that the foregoing is true and correct.
Executed on **November 05, 2014** at **Los Angeles, California**.



Jairo Quintana

- ☒ THE ENCLOSED RECORDS COMPLETE YOUR REQUEST FROM THIS CUSTODIAN.
- ☐ THERE ARE NO RECORDS AT THE ABOVE LOCATION.
- ☐ INCOMPLETE. PATIENT BILLING TO FOLLOW.
- ☐ INCOMPLETE. X-RAYS TO FOLLOW.
- ☐ THIS IS A BILLING OFFICE ONLY.
- ☐ OTHER: _____



VOLUME _____ OF _____

FR-CPROOF21

LP0000526

DECLARATION OF CUSTODIAN OF RECORDSRegarding: MARIO ALBERTO GUERRA LOPEZ AKA MARION A. GUERRA

SS# _____

DOB or other ID# _____

Our File # 41743-01

I am duly authorized as Custodian of Records (or other qualified witness) with the authority to certify records for:

ACADEMY WEST INSURANCE SERVICES
765 Anchor St.
Suite B
Orange Cove, CA

CERTIFICATION OF RECORDS COPIED (Custodian's initials BD)

Including this declaration, all documents, records, and other things called for in the Subpoena Duces Tecum or Authorization which are in my custody have been photocopied (on microfilm) at my office, in my presence, under my direction and control; and the copy submitted with declaration is a true copy thereof.

To the best of my knowledge all records referred to above were prepared or compiled by the personnel of the above named business, in the ordinary course of business, at or near the time of the acts, conditions, or events recorded.

No documents, records, or other things have been withheld in order to avoid their being photocopied.

Certain records were omitted because _____

CERTIFICATION OF NO RECORDS (Custodian's initials _____)

A thorough search of the business revealed no records described in the attached subpoena or authorization for the following reason(s):

- ☐ Patient was never treated at this facility
- ☐ Records were destroyed
- ☐ Records were lost/misplaced
- ☐ Records purged/nothing found
- ☐ Storage facilities were searched and no records found
- ☐ X-rays were: ☐ lost ☐ destroyed ☐ not taken at this facility ☐ patient has them
- ☐ Billing records were: ☐ purged ☐ not kept because this is a prepaid health plan
- ☐ This person was never employed at this facility
- ☐ Other comments: _____

This certification is limited to the information supplied to me in the attached document: records may exist under another name, another spelling, or other identifying data.

CUSTODIAN SIGNATURE

I DECLARE under penalty of perjury the foregoing is true and correct.

Executed on 10/21/14 at 12:49 pm, California
Print Name Benjamin Delgado Signed [Signature]
Phone # 559 626-4211

Order# 41743-01/CPROOF68

LP0000527

Oct. 21, 2014 1:11PM

ACADEMY WEST
LIC #0C39118

CLIENT VOUCHER

No. 0353her #P. 2
108907

Date: 5/14/12 Time: 11:10 AM Office: O.C.

First Named Insured

Mario Guerra

☐ New

☐ Existing

SUGGESTIVE SELL: Does Client: ☐ Own Home ☐ Rent ☐ Neither

Method of Payment:

☐ Cash

☐ Check

☐ Money Order

☐ Credit Card

☐ Mtg billed Gen. Agent

Co.:

Infinity

Amount to Co: \$ 82.40 + Broker Fee \$ 100 + MVR Fee \$ 0 + Required Down \$ 182

Total Policy Premium \$

475

Term 1 / 3 / 6 / 12

Agent:

WJ

Client's Acceptance: X

Mario Guerra

NOTE: This receipt is for a down-payment on a new insurance policy any fees charged are fully earned.

Academy West Insurance

5655 E. Kings Canyon Rd #108

Fresno CA 93727 • (559) 452-4950

RECEIPT

Office: O.C.

Date 6/3/13

Time: 11:08 AM PM

Received from:

Mario Guerra

EFT ORB Mail/Notes

Method of Payment

CASH

CHECK

MONEY ORDER

CREDIT CARD

Company:

Infinity

Policy #

NEW APP

Due Date

Comm '11 rewrite

NOTE: If this payment is made to pay a company generated bill, then we will endorse or to get the funds to the company with all speed by mailing it through the U.S. postal service. EIA, the above customer is advised that we are NOT LICENSED AS A RECEIVING AGENT FOR THE BEHAVIOR THAT PAYMENT TO THE COMPANY IS NOT ACCOMPLISHED UNTIL THE COMPANY RECEIVES IT AT THE LOCATION TO WHICH IT IS ADDED. Payment to this agency does not constitute payment to the insurance company. ***AVISUAL CLIENTE. Un pago hecho en esta agencia no constituye un pago a la compañía de seguros.

Accepted by:

I have read & understand the above note completely and agree de acuerdo con lo mencionado

Payment accepted in agency by

WJ

Amount to Insurance Co.	\$ <u>283</u>
Processing Fee	\$ <u>0</u>
Total Collected	\$ <u>283</u>

000001

LP0000528



Infinity Commercial Vehicle

P.O. Box 830189 Birmingham, AL 35283

(800)722-3391 - Fax (877)722-3391

California

Underwritten By: Infinity Select Insurance Company

Policy Effective ID: 504-65323-2013-001 From Date: 06/03/2013 Time: 13:07:35 To Date: 06/03/2014 Time: 12:01:00 AM		Producer Information Agency: 50481-40212:ACADEMY WEST INS SVCS Producer: ACADEMY WEST Phone #: 559-626-4111 Fax #: 559-626-4141 Location: ORANGE COVE	
Program Options Term: 12 Months Pay Plan: 12 PAY 9% Down IEFT			
Market and Discounts/Surcharges Section Paid-In-Full: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Physical Damage Only: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Prior Coverage: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Excluded Driver: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No DMV/PUC Filing: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No CGL: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Additional Driver Endorsement: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Personal Use on Vehicle(s):		Premium Payment Information Down payment from the insured must be submitted with application. Commission is paid via monthly statement. Has prior balance due been cleared? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If "No", please add amount to down payment. Total Premium: 2145.00 Payment Attached: 203.65	
Previous Insurance Info Previous Carrier: Infinity Ins Co Policy Number: Limits: 15000/30000 Transfer Level: Yes Exp Date:			
Named Insured / Business Information Named Insured: MARIO GUERRA Corporation/Partnership Name: Doing Business As (DBA): MARIO GUERRA Exact Name to be listed: Business Address: 1535 PARK BLVD APT 822 ORANGE COVE, CA 93646 Garaging Address: (if different)			
Home Phone: 559-358-7217 <input checked="" type="checkbox"/> Individual <input type="checkbox"/> Partnership <input type="checkbox"/> Corporation Occupation: A02 Business Phone: 559-358-7217 DMV/PUC Filing #: FR: Ordered			

Driver Information (All drivers and household members 15 years old and older must be listed, including excluded, suspended & unlicensed.)							
Num	Name	DOB	Mar.	Sex	Relationship	Status	SSN
1	MARIO GUERRA	09/08/1989	SINGLE	M	SELF	ACTIVE	
4	MARIA DEL CARMEN MEDINA-MARTINEZ	10/05/1982	SINGLE	F	RELATIVE	ACTIVE	
Num	License #	State	Issue date	CDL Yrs Lic	SR-22	State	Case #
1	A5284051	CA		No	No		
4	8025120	Foreign		No	No		

Point Development (All accidents, violations, and claims chargeable and not chargeable must be disclosed.)					
Driver #	Viol Date	Chargeable	Group	Description	Points
1	09132010	Yes	LIC	Drive w/o License-License Violation	1
4	00/00/2013	No	INT	International/Foreign License	2

Vehicle Information					
Veh #	Year	Make	Description	VIN	Garaging Zip
1	2000	FORD	ECONOLINE E250	1FTNE24L3YHB30780	93646
2	2005	FORD	F150	1FTPW12576KB91410	93646
3	2001	DODGE	RAM 3500	3B8MC38881M2B0825	93646

Additional Vehicle Information							
Veh #	Stated Amount	Territory	Use Class	No. Stops P/Day	G.V.W. Gallons Load Cap	Max Radius	Body Type
1	\$3600	0596	Non-Business	3	10000	50	410
2	\$7500	0596	Non-Business	3	10000	200	205
3	\$4000	0596	Commercial	3	14000	100	229

Policy Deductible Information						
	COM	COL	FTC	CARGO	REN	TOW
Vehicle 1						
Vehicle 2	\$500 Deductible	\$500 DED				
Vehicle 3						

Vehicle Loss Payee/Additional Insured/Additional Interest Information						
Veh #	Name	Type	Address	City	State	Zip

Custom Parts and Equipment Note: Permanently attached special equipment and its current value must be listed to be covered in stated amount.				
Veh #	Permanently Attached Special Equipment (Welders, Winches, Booms, Drill Rigs, Etc.)	Vehicle Stated Amount	Equipment Stated Amount	Total Combined Stated Amount
1	:	\$3600	0	3600
2	:	\$7500	0	7500
3	:	\$4000	0	4000

Policy Coverage Information	
Coverage	Limits
Bodily Injury (BI)	\$25000 each person / \$50000 each accident
Property Damage (PD)	\$15000 each accident
Uninsured Motorist Bodily Injury (UMBI)	
Uninsured Motorists Property Damage	
Medical Payments (MED)	
Hired Auto - Bodily Injury	Declined
Hired Auto - Property Damage	Declined
Non-Owned - Bodily Injury	Declined
Non-Owned - Property Damage	Declined
Any Auto - Bodily Injury	Declined
Any Auto - Property Damage	Declined
Cargo	

Policy Premium Information									
	BI	PD	UMBI	UMPD	MED	AABI	AAPD	HABI	HAPD
Vehicle 1	\$389.00	\$157.00							
Vehicle 2	\$453.00	\$183.00							
Vehicle 3	\$421.00	\$170.00							

Policy Premium Information (continued)									
	NOBI	NOPD	COM	COL	FTC	CARGO	REN	TOW	Vehicle Total
Vehicle 1									\$548.00
Vehicle 2			\$94.00	\$278.00					\$1008.00
Vehicle 3									\$581.00

Premium Information			
Vehicle Fee:	\$120.00	Total Fees:	\$120.00
\$R22 Filing Fee:	\$0.00	Total Premium:	\$2145.00
Waivers of Subrogation Fees:	\$0.00		
Additional Insured Fees:	\$0.00		
Dot Fees:	\$0.00		

Notes to Infinity

General Info



Infinity Commercial Vehicle

P.O. Box 830189 Birmingham, AL 35283

(800)722-3391 - Fax (877)722-3391

California

Underwritten By: Infinity Select Insurance Company

Policy Effective ID# 504-65323-2013-001 From Date: 05/14/2012 Time: 13:15:30 To Date: 05/14/2010 Time: 12:01:00 AM		Producer Information Agency: 50461-40212:ACADEMY WEST INS SVCS Producer: ACADEMY WEST Phone #: 559-626-4111 Fax #: 559-626-4141 Location: ORANGE COVE	
Program Options Term: 12 Months Pay Plan: 10 PAY 10% Down			
Market and Discounts/Surcharges Section Paid-In-Full: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Physical Damage Only: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Prior Coverage: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Excluded Driver: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No DMV/PUC Filing: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No CGL: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Additional Driver Endorsement: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Personal Use on Vehicle(s):		Premium Payment Information Down payment from the insured must be submitted with application. Commission is paid via monthly statement. Has prior balance due been cleared? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If "No", please add amount to down payment. Total Premium: 475.00 Payment Attached: 82.40	
Previous Insurance Info Previous Carrier: NO CONTINUOUS PRIOR INSURANCE FOR PAST 6 MONTHS Policy Number: Limits: no prior Transfer Level: No Proof or less than 6 month Continuous Coverage Exp Date:			
Named Insured / Business Information Named Insured: MARIO GUERRA Corporation/Partnership Name: Doing Business As (DBA): MARIO GUERRA Exact Name to be listed: Business Address: 1535 PARK BLVD APT 522 ORANGE COVE, CA 93648 Garaging Address: (if different) , CA Home Phone: 559-358-7217 <input checked="" type="checkbox"/> Individual <input type="checkbox"/> Partnership <input type="checkbox"/> Corporation Occupation: A02 Business Phone: 559-358-7217 DMV/PUC Filing #: FR: Ordered			

Driver Information (All drivers and household members 15 years old and older must be listed, including excluded, suspended & unlicensed.)							
Num	Name	DOB	Mar.	Sex	Relationship	Status	SSN
1	MARIO GUERRA	09/08/1969	SINGLE	M	SELF	ACTIVE	
Num	License #	State	Issue date	CDL Yrs Lic	SR-22	State	Case #
1	A5284051	CA			No		

Point Development (All accidents, violations, and claims chargeable and not chargeable must be disclosed.)					
Driver #	Viol Date	Chargeable	Group	Description	Points
1	08132010	Yes	LIC	Drive w/o License-License Violation	- 1

Vehicle Information				
Veh #	Year	Make	Description	VIN
1	2001	DODGE	RAM 3500	3B6MC36681M280825
				Garaging Zip: 93646

Additional Vehicle Information

Veh #	Stated Amount	Territory	Use Class	No. Stops P/Day	G.V.W. Gallons Load Cap	Max Radius	Body Type
1	\$7000	0598	Service	1	14000	100	228

Policy Deductible Information

	COM	COL	FTC	REN	TOW
Vehicle 1					

Vehicle Loss Payee/Additional Insured/Additional Interest Information

Veh #	Name	Type	Address	City	State	Zip

Custom Parts and Equipment Note: Permanently attached special equipment and its current value must be listed to be covered in stated amount.

Veh #	Permanently Attached Special Equipment (Welders, Winches, Booms, Drill Rigs, Etc.)	Vehicle Stated Amount	Equipment Stated Amount	Total Combined Stated Amount
1		\$7000	0	7000

Policy Coverage Information

Coverage	Limits
Bodily Injury (BI)	\$15000 each person / \$30000 each accident
Property Damage (PD)	\$5000 each accident
Uninsured Motorist Bodily Injury (UMBI)	
Uninsured Motorists Property Damage	
Medical Payments (MED)	
HABI	Declined
HAPD	Declined
NOBI	Declined
NOPD	Declined

Policy Premium Information

	BI	PD	UMBI	UMPD	MED	HABI	HAPD	NOBI	NOPD	COM	COL	FTC	REN	TOW	Vehicle Total
Vehicle 1	\$852.00	\$123.00													\$475.00

Premium Information

Vehicle Fee:	\$40.00		
SR22 Filing Fee:	\$0.00	Total Fees:	\$40.00
Waivers of Subrogation Fees:	\$0.00	Total Premium:	\$475.00
Additional Insured Fees:	\$0.00		
DOT Fee:	0.00		

Notes to Infinity

General Info

INFINITYAgents

Monday

October 13, 2014

	Primary Installment Activity Transactions Vehicle/Drivers Documents ID Card Letter Notes						
	Claims	Renewal	Lien/Add'l Ins	Suspense	Company	Auto Pay	Fax Cover Change Request
Refresh	81 504-55323-2013-001 [2] Prev Ver Program Infinity Commercial Effective 06/03/2013 Expiration 06/03/2014 Guerra, Mario Alberto Status Canceled/Insured Request State California						
	Date / Time	Source	Ver	Chg Num	Chg Eff Date	Notes	
Endorsement	12/14/2013 11:21:11	IR	2	11	01/18/2014	Per Insured's request.	
	12/11/2013 14:45:54	PhoneIns-Endrs	2	10	12/11/2013	Changed Pay Plan Option from 12-Pay EFT to 12-Pay; Changed Payment Method from AutoPay Bank to Direct Bill; Deactivated EFT information. no Premium Change.	
Cancellation	11/23/2013 12:29:50	NormalizaCo	2	9	11/23/2013	Due to new postal regulations the insured's company address has been modified from: 11811 Peach Ave Hesperia CA 92345-4952 - to: 11811 PEACH AVE HESPERIA CA 92345-4952. This is in compliance with IT Task 200811-137.	
Payments	10/10/2013 11:22:20	PhoneIns-Endrs	2	8	10/10/2013	Removed vehicle 2005 Ford F150 VIN 1FTPW12578K091410; Changed BI 25/50/15 to BI 750 CSL and PD 25/50/15 to PD 750 CSL for 2003 Internat 4000 Series 4300 VIN 1HTMMAAM23H589988; Added DBA Guerra Produce; Added PUC Filing Number 344409; Changed Filing Type from None to M&P - Other Property Carriers. Premium Increase from 3,425.00 to 3,755.00 a change of 327.00.	
Forms	09/18/2013 12:04:02	FaxImage	2	7	09/16/2013	Effective 09/16/2013 changed status from active to excluded for Daniel Carachola. Decrease in premium \$1,824.00.	
Close	09/09/2013 11:31:04	PhoneIns-Endrs	2	6	09/09/2013	Removed vehicle 2001 Dodge Ram 3500 VIN 3B8MC36681M280825. Premium Decrease from 5,569.00 to 5,312.00 a change of 257.00.	
	09/09/2013 11:31:04	PhoneIns-Endrs	2	5	09/09/2013	Changed Insured's Mailing and Garaging Address from 1535 Park Blvd Apt 522, Orange Cove, CA 92646-9326 to 11811 Peach Ave, Hesperia, CA 92345-4952, Changed Insured's Work Phone from (559) 358-7217 to (559) 397-4333, Removed vehicle 2000 Ford Econoline E250 VIN 1FTNE24L3YHB30780, Changed Marital Status from S to M, Driver Work Phone from (559) 358-7217 to (559) 397-4333 for Driver Mario Guerra with DOB 09/08/1989, Changed Marital	

000007

LP0000534