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[REDACTED]

Attorneys for Plaintiff, [REDACTED]

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES - CENTRAL**

[REDACTED]

Plaintiff,

vs.

[REDACTED]

Defendants.

CASE NO. [REDACTED]

Case Assigned to: Hon. Ronald M. Sohigian  
Dept.: "41"

Complaint filed on [REDACTED]

**FIRST SET OF REQUEST FOR  
PRODUCTION OF DOCUMENTS TO  
DEFENDANTS**

PROPOUNDING PARTY: Plaintiff, [REDACTED]

RESPONDING PARTIES: Defendants, [REDACTED]

[REDACTED]

SET NUMBER: ONE (1)

PLEASE TAKE NOTICE that plaintiff, [REDACTED]

INC., hereby requests defendants, [REDACTED]

[REDACTED] respond to the following First Set of

[REDACTED]  
**FIRST SET OF REQUEST FOR PRODUCTION OF DOCUMENTS TO DEFENDANTS**

1 Request for Production of Documents pursuant to Code of Civil Procedure §2031 as  
2 follows:

3 Definitions:

4 a) WRITINGS shall be defined as handwriting, typewriting, printing, photostating,  
5 photographing, and every other means of recording upon any tangible thing, any form of  
6 communication or representation, including [but not limited to] letters, words, pictures,  
7 sounds, or symbols, or combinations thereof.

8 b) The term “any other party to this action” refers to either defendant, [REDACTED]  
9 [REDACTED]  
10 [REDACTED] their agents, attorneys, representatives, or anyone else acting on their behalf  
11 or their request.

12 **REQUEST FOR PRODUCTION OF DOCUMENTS NUMBER ONE:**

13 Each and every claims file, in its entirety, including branch, regional and home office  
14 claims files pertaining to the claim for benefits submitted by or on behalf of plaintiff under  
15 [REDACTED] policy numbers [REDACTED] and [REDACTED]

16 **REQUEST FOR PRODUCTION OF DOCUMENTS NUMBER TWO:**

17 Each and every underwriting file pertaining to [REDACTED] policy numbers [REDACTED]  
18 and [REDACTED]

19 **REQUEST FOR PRODUCTION OF DOCUMENTS NUMBER THREE:**

20 A true and correct copy of the complete [REDACTED] “Claims Office Manual” or  
21 such similar document(s) by whatever name or title used by defendants for the handling of  
22 commercial fire claims for the following years:

- 23 1. 2003
- 24 2. 2004
- 25 3. 2005

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1 **REQUEST FOR PRODUCTION OF DOCUMENTS NUMBER FOUR:**

2 A true and correct copy of the complete "Training Manual" or such similar document(s) by  
3 whatever name or title used by defendants for the purpose of training their employees in  
4 the handling of commercial fire claims for the following years:

- 5 a. 2003  
6 b. 2004  
7 c. 2005

8 **REQUEST FOR PRODUCTION OF DOCUMENTS NUMBER FIVE:**

9 True and correct copies of any and all claim bulletins, internal memoranda, letters,  
10 notices, or similar documents sent by management to the claims staff at either defendant

11 [REDACTED]

12 [REDACTED] relating to the handling of commercial fire claims for the following years:

- 13 a. 2003  
14 b. 2004  
15 c. 2005

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17 Dated: [REDACTED] [REDACTED]

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19 By \_\_\_\_\_

20 William A. Daniels  
21 Attorneys for Plaintiff

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