

**From:** Stephen Carroll [stephen.carroll@aon.com](mailto:stephen.carroll@aon.com)   
**Subject:** RE: Amazing Grace  
**Date:** March 4, 2015 at 12:25 PM  
**To:** alan elliott (ucla) [alanelliott@g.ucla.edu](mailto:alanelliott@g.ucla.edu)  
**Cc:** Ramona V. Horne [ramona.horne@aon.com](mailto:ramona.horne@aon.com), George Chignell [georgec@passion-pictures.com](mailto:georgec@passion-pictures.com), john battsek [john@passion-pictures.com](mailto:john@passion-pictures.com), Joe Boyd [boyd1j@yahoo.co.uk](mailto:boyd1j@yahoo.co.uk), Todd W. Musburger [todd@musburger.com](mailto:todd@musburger.com)



Here is the quote from Hiscox. I am waiting on Axis.

Stephen Carroll, V.P.  
Aon/Albert G. Ruben Insurance Services Inc.-New York  
171 Madison Ave., Suite 401  
New York, NY 10016  
Phone: 212-337-4353  
Cell: 914-589-2474  
Fax: 847-953-2692

---

**From:** alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]  
**Sent:** Wednesday, March 04, 2015 3:24 PM  
**To:** Stephen Carroll  
**Cc:** Ramona V. Horne; George Chignell; john battsek; Joe Boyd; Todd W. Musburger  
**Subject:** Re: Amazing Grace

hey stephen

we are checking in re policy.

please let us know.

thank you.

-----

phone: 323 988 9692

Sent from a iPhone



This email... may have been dictated into the iPhone, so please forgive the mistakes... transmission, including any previous messages or attachments to it, contains information that may be proprietary, confidential and/or privileged. If you have received this transmission in error, please delete the original transmission without making copies, disclosing, distributing, saving or making use of it in any manner (all of which acts are strictly prohibited), and so notify the sender by reply [info@alanelliott.net](mailto:info@alanelliott.net).

On Feb 27, 2015, at 1:42 PM, Stephen Carroll <[stephen.carroll@aon.com](mailto:stephen.carroll@aon.com)> wrote:

Thank you...I have forwarded info to underwriters

Stephen Carroll, V.P.  
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New York, NY 10016  
Phone: 212-337-4353  
Cell: 914-589-2474  
Fax: 847-953-2692

---

**From:** alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]  
**Sent:** Friday, February 27, 2015 3:50 PM  
**To:** Stephen Carroll  
**Cc:** Ramona V. Horne; George Chignell; john battsek; Joe Boyd; Todd W. Musburger  
**Subject:** Re: Amazing Grace

hi stephen

please see answers below.

On Feb 27, 2015, at 11:22 AM, Stephen Carroll  
<[stephen.carroll@aon.com](mailto:stephen.carroll@aon.com)> wrote:

So after all this time my underwriter finally responded to the submission and had the following questions. I apologize but would appreciate any clarification you can provide:

1. Is this a documentary, music video or something else?

documentary

2. What is the anticipated distribution/dissemination? theatrical release, TV special, etc...?

theatrical, vod, dvd, television

3. Was it previously produced and released and now they're re-releasing it?

it was (technically) produced by warners.

elements of the project have been released at least twice that we know of:

- 1) the atlantic 25th anniversary film, made with braverman productions <image001.png>
- 2) aretha franklin; the queen of soul (august 22, 1988)  
(<http://www.imdb.com/title/tt0210537/>)

4. If not previously released please advise who produced it and who currently owns the copyright and what agreements are in place with this applicant.

the current iteration of the footage is owned by me with quitclaim from warner bors. films.

5. Did they obtain rights from Warner Brothers?

yes.

6. Did they obtain rights from Atlantic Records?

none needed, as per atlantic/warner music group.

7. Did Aretha Franklin participate in this production?

yes

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Phone: 212-337-4353  
Cell: 914-589-2474  
Fax: 847-953-2692



Amazing Grace  
Hiscox...te.PDF



**From:** Laura Comerford [laura.comerford@aon.com](mailto:laura.comerford@aon.com)  
**Subject:** RE: amazing grace; 27700815 - E&O - Aretha Franklin Claim  
**Date:** May 16, 2017 at 10:31 AM  
**To:** alan elliott (ucla) [alanelliott@g.ucla.edu](mailto:alanelliott@g.ucla.edu)  
**Cc:** Maria Clark [maria.clark@aon.com](mailto:maria.clark@aon.com)



Maria is sending to Hiscox and I spoke with the underwriter to let her know that you want them to reconsider the claim. We will make sure you are copied in their response.

Laura

Laura R. Comerford  
Vice President  
Aon/Albert G. Ruben Insurance Services, Inc.  
171 Madison Avenue, Suite 401  
New York, NY 10016  
Direct Phone: 212-337-4354

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**From:** alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]  
**Sent:** Tuesday, May 16, 2017 1:11 PM  
**To:** Laura Comerford  
**Cc:** Maria Clark  
**Subject:** Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim

hi laura and maria

i wanted to check in and see where we are on this.

thank you.

-alan

-----

**phone: 323 988 9692**

**peace and love.**

On May 12, 2017, at 11:37 AM, Laura Comerford  
<[laura.comerford@aon.com](mailto:laura.comerford@aon.com)> wrote:

Thanks Alan.

Maria call me when you have a chance.

Laura

Laura R. Comerford  
Vice President  
Aon/Albert G. Ruben Insurance Services, Inc.  
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**Sent:** Friday, May 12, 2017 1:24 PM  
**To:** Laura Comerford  
**Cc:** Maria Clark  
**Subject:** Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim

Dear Laura,

I request that AON go back to Hiscox and have them reconsider providing coverage for the claim originally submitted in 2015.

When Hiscox declined coverage, it was because Hiscox claimed I had, after intensive vetted phone calls, emails and discussions with both Hiscox and with AON, failed to disclose previous issues with Ms. Franklin and that I answered the following question incorrectly:

"Have you suffered any loss or has any claim, whether successful or not, ever been made against you that would be covered by this insurance."

Hiscox and AON specifically directed me to answer the question "no." In discussions I had with both Hiscox's counsel Ted Gerdes, as well as AON's Stephen Carroll, we specifically reviewed the 2011 lawsuit and the personal service contract obtained in 2013 when considering how to answer the question. Thus, the answer was discussed and deliberated with both the carrier and the broker.

Because of the 2013 discovery of the personal service contract, AON/Hiscox vetted the contract and when the question came up, everyone was aware of the prior issues and they were satisfied with the enforceability of the personal service contract, which was evinced in the answer. Coinciding with the time of Hiscox's exclusion of Aretha Franklin in 2015, I made a deal with Ms. Franklin's counsel that would nullify any issues. Because of this deal, I did not fight Hiscox. However, after more than 15 months of negotiations, Ms. Franklin has declined two fully negotiated contracts that were approved and generated by and with her counsel. Both offers were OVER and above what Ms. Franklin and her counsel asked for. Ms. Franklin has since fired her counsel and I have no hope that she will accept any offer. Because Ms. Franklin refuses to negotiate any further, this leaves me no other option but to reopen the case in Denver.

The fundamental and virtually singular reason for my Hiscox insurance was because of Ms. Franklin's volatility. Insurance would allow me to defend and enforce Ms. Franklin's contract, which was recently discovered (in 2013) by Warner Films. Hiscox directed me to discuss these matters with Ted Gerdes, I specifically told Mr. Gerdes about the 2011 lawsuit, providing him with links in emails to the "cease and desist" settlement which resulted from the lawsuit.

As this film deals with one of the more well known personalities in the world in Ms. Franklin, a woman who is known for her controversial and public disposition and litigious behavior, it is not credible that Hiscox can say, after the intensive application process that we went through, that they had no knowledge.

To remind from where the confusion/untangling emanated:

In 2011, Ms. Franklin filed a very public lawsuit against me, preventing the film from being

exhibited.

In 2013, Warner Films discovered Ms. Franklin's personal service contract, which plainly allowed me to distribute the film.

The 2011 lawsuit was settled out of court, I suffered no loss. This 2011 claim was not something that would be covered by this insurance as we now had a signed contract from Ms. Franklin, one that had been used to make and distribute the film.

Importantly, all communications were done with knowledge by Hiscox/AON that the personal service contract and specifically the "indemnification letter" on page 2 of Ms. Franklin's personal service contract (which states: "We do hereby undertake and agree to hold and save you harmless of, from and against any loss, cost, damage or expense which may arise or result from said agreement, and we further agree that we will, upon demand, reimburse you for any cost, liability, or expense which you may incur or any payment which you make in accordance with, or as a result of, such agreement.") would serve as the "insurance for the insurance."

The muddiness of these events (Ms. Franklin suing me and hoping I would never find- or enforce her personal service contract) led my counsel and AON/Hiscox to dutifully consider the question, and it is disingenuous for Hiscox to claim otherwise.

Thank you.

Alan

-----

**phone: 323 988 9692**

**peace and love.**

On May 9, 2017, at 12:40 PM, Laura Comerford  
<[laura.comerford@aon.com](mailto:laura.comerford@aon.com)> wrote:

Hi Alan

Per our conversation, you would like to go back to Hiscox and have them reconsider providing coverage for the claim originally submitted in 2015. Please confirm via this e-mail and provide any new details and reason behind your disagreement with carrier, specifically that the claim presented was not related to the 2011 claim and why. Maria will then get in contact with Hiscox and see what they say.

Thanks,

Laura

Laura R. Comerford  
Vice President  
Aon/Albert G. Ruben Insurance Services, Inc.

171 Madison Avenue, Suite 401  
New York, NY 10016  
Direct Phone: 212-337-4354

---

**From:** alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]  
**Sent:** Tuesday, May 09, 2017 12:48 PM  
**To:** Laura Comerford  
**Subject:** Fwd: amazing grace; 27700815

thank you.

-alan

----

**phone: 323 988 9692**

**peace and love.**

Begin forwarded message:

**From:** alan elliott (ucla) <[alanelliott@g.ucla.edu](mailto:alanelliott@g.ucla.edu)>  
**Subject:** amazing grace; 27700815  
**Date:** May 8, 2017 at 1:56:22 PM PDT  
**To:** Stephen Carroll <[stephen.carroll@aon.com](mailto:stephen.carroll@aon.com)>

hi stephen

i hope this finds you well.

i can use your help please. i need copies of all of AON's communications with hiscox in connection with the underwriting of my 2015-2018 policy.

please let me know.

thank you.

-alan

----

**phone: 323 988 9692**

**peace and love.**

**From:** Laura Comerford [laura.comerford@aon.com](mailto:laura.comerford@aon.com)  
**Subject:** RE: amazing grace; 27700815 - E&O - Aretha Franklin Claim  
**Date:** June 19, 2017 at 7:28 AM  
**To:** alan elliott (ucla) [alanelliott@g.ucla.edu](mailto:alanelliott@g.ucla.edu)  
**Cc:** Maria Clark [maria.clark@aon.com](mailto:maria.clark@aon.com), Todd W. Musburger [todd@musburger.com](mailto:todd@musburger.com)



Maria is back from vacation today and she will be checking her e-mails and will advise of any response.

Laura

Laura R. Comerford  
Vice President  
Aon/Albert G. Ruben Insurance Services, Inc.  
171 Madison Avenue, Suite 401  
New York, NY 10016  
Direct Phone: 212-337-4354

---

**From:** alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]  
**Sent:** Friday, June 16, 2017 12:02 PM  
**To:** Laura Comerford  
**Cc:** Maria Clark; Todd W. Musburger  
**Subject:** Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim

hi laura

i am checking in to see if there is any response. please let me know.

thank you.

-alan

-----

phone: [323 988 9692](tel:3239889692)

peace and love.

On Jun 1, 2017, at 12:41 PM, Laura Comerford <[laura.comerford@aon.com](mailto:laura.comerford@aon.com)> wrote:

Hi Alan

Maria will pass on to Hiscox but per her e-mail yesterday, they advised it is with coverage counsel and will probably be a couple of weeks before we hear back.

Laura

Laura R. Comerford  
Vice President  
Aon/Albert G. Ruben Insurance Services, Inc.  
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New York, NY 10016  
Direct Phone: 212-337-4354

---

**From:** alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]  
**Sent:** Thursday, June 01, 2017 1:57 PM  
**To:** Laura Comerford; Maria Clark  
**Cc:** Todd W. Musburger  
**Subject:** amazing grace; 27700815 - E&O - Aretha Franklin Claim

hi laura and maria

i want you, as my insurance brokers, to have the following. (see below.)

this case is now becoming EXTREMELY time sensitive as scheduling to make certain deadlines for the fall are now coming on.

if there???'s any way to get an answer asap from hiscox, that is very much appreciated.

thank you.

-alan

-----

**phone: 323 988 9692**

**peace and love.**

Begin forwarded message:

**From:** Steven Zansberg <[SZansberg@lskslaw.com](mailto:SZansberg@lskslaw.com)>  
**Subject:** Frankin v. Elliott  
**To:** "alan elliott (ucla) ([alanelliott@g.ucla.edu](mailto:alanelliott@g.ucla.edu))" <[alanelliott@g.ucla.edu](mailto:alanelliott@g.ucla.edu)>

Alan:

Attached for your review:

The DRAFT of the letter I propose to send to Reid Neureiter, after your and Larry???'s review and edits, and after I give Reid a ???heads up??? courtesy call that it is coming his way.

Please let me know if you'd like to schedule a call, tomorrow afternoon or Thursday, to discuss these.

Best regards,  
Steve

Steven D. Zansberg

<image001.jpg>

1888 Sherman Street  
Suite 370  
Denver, CO 80203  
(303) 376-2409 | Phone  
(303) 376-2401 | Fax  
[www.lskslaw.com](http://www.lskslaw.com)

**From:** Laura Comerford laura.comerford@aon.com  
**Subject:** RE: amazing grace; 27700815 - E&O - Aretha Franklin Claim  
**Date:** May 23, 2017 at 1:51 PM  
**To:** alan elliott (ucla) alanelliott@g.ucla.edu  
**Cc:** Maria Clark maria.clark@aon.com



Maria have you heard anything from Hiscox?

Laura R. Comerford  
Vice President  
Aon/Albert G. Ruben Insurance Services, Inc.  
171 Madison Avenue, Suite 401  
New York, NY 10016  
Direct Phone: 212-337-4354

---

**From:** alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]  
**Sent:** Tuesday, May 23, 2017 1:53 PM  
**To:** Laura Comerford  
**Cc:** Maria Clark  
**Subject:** Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim

hi laura and maria

i am checking up in this. please let me know.

thank you.

-alan

-----  
phone: [323 988 9692](tel:3239889692)

peace and love.

On May 16, 2017, at 10:31 AM, Laura Comerford <[laura.comerford@aon.com](mailto:laura.comerford@aon.com)> wrote:

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Laura

Laura R. Comerford  
Vice President  
Aon/Albert G. Ruben Insurance Services, Inc.  
171 Madison Avenue, Suite 401  
New York, NY 10016

Direct Phone: 212-337-4354

---

**From:** alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]  
**Sent:** Tuesday, May 16, 2017 1:11 PM  
**To:** Laura Comerford  
**Cc:** Maria Clark  
**Subject:** Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim

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Maria call me when you have a chance.

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**Sent:** Friday, May 12, 2017 1:24 PM  
**To:** Laura Comerford  
**Cc:** Maria Clark  
**Subject:** Re: amazing grace: 27700815 - E&O - Aretha Franklin Claim

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which you may incur or any payment which you make in accordance with, or as a result of, such agreement.”) would serve as the “insurance for the insurance.” The muddiness of these events (Ms. Franklin suing me and hoping I would never find- or enforce her personal service contract) led my counsel and AON/Hiscox to dutifully consider the question, and it is disingenuous for Hiscox to claim otherwise.

Thank you.

Alan

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Vice President  
Aon/Albert G. Ruben Insurance Services, Inc.  
171 Madison Avenue, Suite 401  
New York, NY 10016  
Direct Phone: 212-337-4354

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**From:** alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]  
**Sent:** Tuesday, May 09, 2017 12:48 PM  
**To:** Laura Comerford  
**Subject:** Fwd: amazing grace; 27700815

thank you.

-alan

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**phone: 323 988 9692**

**peace and love.**

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**Subject:** amazing grace; 27700815  
**Date:** May 8, 2017 at 1:56:22 PM PDT  
**To:** Stephen Carroll <[stephen.carroll@aon.com](mailto:stephen.carroll@aon.com)>

hi stephen

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i can use your help please. i need copies of all of AON's communications with hiscox in connection with the underwriting of my 2015-2018 policy.

please let me know.

thank you.

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**peace and love.**

**From:** Maria Clark maria.clark@aon.com  
**Subject:** RE: amazing grace; 27700815 - E&O - Aretha Franklin Claim  
**Date:** June 19, 2017 at 1:38 PM  
**To:** Laura Comerford laura.comerford@aon.com, alan elliott (ucla) alanelliott@g.ucla.edu  
**Cc:** Todd W. Musburger todd@musburger.com



Hi Alan,

I sent a follow up note to the Hiscox adjuster requesting an update of coverage counsel's review.

I will advise once I hear back from her.

Thank you.

Sincerely,  
Maria Clark | Claims Manager

---

AON/Albert G. Ruben Company (New York) Inc.  
171 Madison Avenue, Suite 401  
New York, NY 10016  
Direct Tel: 212-463-5583 | Main Tel: 212-627-7400  
Direct Fax: 847-953-0892  
Email: [maria.clark@aon.com](mailto:maria.clark@aon.com)

\*\*\*\*\*  
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Before you print, think about the ENVIRONMENT 

---

**From:** Laura Comerford  
**Sent:** Monday, June 19, 2017 10:29 AM  
**To:** alan elliott (ucla)  
**Cc:** Maria Clark; Todd W. Musburger  
**Subject:** RE: amazing grace; 27700815 - E&O - Aretha Franklin Claim

Maria is back from vacation today and she will be checking her e-mails and will advise of any response.

Laura

Laura R. Comerford  
Vice President  
Aon/Albert G. Ruben Insurance Services, Inc.  
171 Madison Avenue, Suite 401  
New York NY 10016

NEW YORK, NY 10016

Direct Phone: 212-337-4354

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**Sent:** Friday, June 16, 2017 12:02 PM  
**To:** Laura Comerford  
**Cc:** Maria Clark; Todd W. Musburger  
**Subject:** Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim

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phone: [323 988 9692](tel:3239889692)

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**Sent:** Thursday, June 01, 2017 1:57 PM  
**To:** Laura Comerford; Maria Clark  
**Cc:** Todd W. Musburger  
**Subject:** amazing grace; 27700815 - E&O - Aretha Franklin Claim

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**phone: 323 988 9692**

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Begin forwarded message:

**From:** Steven Zansberg <[SZansberg@lskslaw.com](mailto:SZansberg@lskslaw.com)>

**Subject:** Frankin v. Elliott

**To:** "alan elliott (ucla) ([alanelliott@g.ucla.edu](mailto:alanelliott@g.ucla.edu))" <[alanelliott@g.ucla.edu](mailto:alanelliott@g.ucla.edu)>

Alan:

Attached for your review:

The DRAFT of the letter I propose to send to Reid Neureiter, after your and Larry???'s review and edits, and after I give Reid a ???heads up??? courtesy call that it is coming his way.

Please let me know if you???'d like to schedule a call, tomorrow afternoon or Thursday, to discuss these.

Best regards,  
Steve

Steven D. Zansberg

<image001.jpg>

1888 Sherman Street  
Suite 370  
Denver, CO 80203  
(303) 376-2409 | Phone  
(303) 376-2401 | Fax  
[www.lskslaw.com](http://www.lskslaw.com)



**From:** Maria Clark maria.clark@aon.com  
**Subject:** RE: amazing grace; 27700815 - E&O - Aretha Franklin Claim  
**Date:** May 23, 2017 at 2:26 PM  
**To:** Laura Comerford laura.comerford@aon.com, alan elliott (ucla) alanelliott@g.ucla.edu



I have not heard back. I will follow up with them.

Sincerely,  
Maria Clark | Claims Manager

---

AON/Albert G. Ruben Company (New York) Inc.  
171 Madison Avenue, Suite 401  
New York, NY 10016  
Direct Tel: 212-463-5583 | Main Tel: 212-627-7400  
Direct Fax: 847-953-0892  
Email: [maria.clark@aon.com](mailto:maria.clark@aon.com)

\*\*\*\*\*

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Before you print, think about the ENVIRONMENT 

---

**From:** Laura Comerford  
**Sent:** Tuesday, May 23, 2017 4:51 PM  
**To:** alan elliott (ucla)  
**Cc:** Maria Clark  
**Subject:** RE: amazing grace; 27700815 - E&O - Aretha Franklin Claim

Maria have you heard anything from Hiscox?

Laura R. Comerford  
Vice President  
Aon/Albert G. Ruben Insurance Services, Inc.  
171 Madison Avenue, Suite 401  
New York, NY 10016  
Direct Phone: 212-337-4354

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**From:** alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]  
**Sent:** Tuesday, May 23, 2017 1:53 PM  
**To:** Laura Comerford  
**Cc:** Maria Clark  
**Subject:** Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim

hi laura and maria

i am checking up in this. please let me know.

thank you.

-alan

-----

phone: [323 988 9692](tel:3239889692)

peace and love.

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**From:** alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]  
**Sent:** Tuesday, May 09, 2017 12:48 PM  
**To:** Laura Comerford  
**Subject:** Fwd: amazing grace; 27700815

thank you.

-alan

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**phone: 323 988 9692**

**peace and love.**

Begin forwarded message:

**From:** alan elliott (ucla) <[alanelliott@g.ucla.edu](mailto:alanelliott@g.ucla.edu)>  
**Subject:** amazing grace; 27700815  
**Date:** May 8, 2017 at 1:56:22 PM PDT  
**To:** Stephen Carroll <[stephen.carroll@aon.com](mailto:stephen.carroll@aon.com)>

hi stephen

i hope this finds you well.

i can use your help please. i need copies of all of AON's communications with hiscox in connection with the underwriting of my 2015-2018 policy.

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**From:** Maria Clark maria.clark@aon.com  
**Subject:** RE: amazing grace; 27700815 - E&O - Aretha Franklin Claim  
**Date:** May 25, 2017 at 11:25 AM  
**To:** alan elliott (ucla) alanelliott@g.ucla.edu  
**Cc:** Laura Comerford laura.comerford@aon.com



Hi Alan,

The adjuster, Tara Bodden, who was assigned to the handling of this claim is in a mediation today. I forwarded her an e-mail following up for a response.

Thank you.

Sincerely,  
Maria Clark | Claims Manager

---

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171 Madison Avenue, Suite 401  
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**From:** alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]  
**Sent:** Thursday, May 25, 2017 11:56 AM  
**To:** Laura Comerford  
**Cc:** Maria Clark  
**Subject:** Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim

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**To:** Laura Comerford  
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**Subject:** amazing grace; 27700815  
Date: May 9, 2017 at 1:56:00 PM EDT

**Date:** May 8, 2017 at 1:50:22 PM PDT

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**From:** Maria Clark maria.clark@aon.com  
**Subject:** RE: amazing grace; 27700815 - E&O - Aretha Franklin Claim  
**Date:** May 31, 2017 at 9:28 AM  
**To:** alan elliott (ucla) alanelliott@g.ucla.edu  
**Cc:** Laura Comerford laura.comerford@aon.com



Hi Alan,

Please be advised that Hiscox sent your request out to coverage counsel and expects to get a response back in the next couple of weeks.

As soon as we hear back from them, we will advise you of their determination.

Thank you.

Sincerely,  
Maria Clark | Claims Manager

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**From:** alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]  
**Sent:** Wednesday, May 31, 2017 10:57 AM  
**To:** Laura Comerford  
**Cc:** Maria Clark  
**Subject:** Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim

hello laura and maria

can we get a timeline on an answer if not... maybe an actual answer please?

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**Subject:** RE: amazing grace; 27700815 - E&O - Aretha Franklin Claim  
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**To:** alan elliott (ucla) [alanelliott@g.ucla.edu](mailto:alanelliott@g.ucla.edu), Maria Clark [maria.clark@aon.com](mailto:maria.clark@aon.com)  
**Cc:** Todd W. Musburger [todd@musburger.com](mailto:todd@musburger.com)

LC

Hi Alan

Maria will pass on to Hiscox but per her e-mail yesterday, they advised it is with coverage counsel and will probably be a couple of weeks before we hear back.

Laura

Laura R. Comerford  
Vice President  
Aon/Albert G. Ruben Insurance Services, Inc.  
171 Madison Avenue, Suite 401  
New York, NY 10016  
Direct Phone: 212-337-4354

---

**From:** alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]  
**Sent:** Thursday, June 01, 2017 1:57 PM  
**To:** Laura Comerford; Maria Clark  
**Cc:** Todd W. Musburger  
**Subject:** amazing grace; 27700815 - E&O - Aretha Franklin Claim

hi laura and maria

i want you, as my insurance brokers, to have the following. (see below.)

this case is now becoming EXTREMELY time sensitive as scheduling to make certain deadlines for the fall are now coming on.

if there???'s any way to get an answer asap from hiscox, that is very much appreciated.

thank you.

-alan

-----

**phone: 323 988 9692**

**peace and love.**

Begin forwarded message:

**From:** Steven Zansberg <[SZansberg@lskslaw.com](mailto:SZansberg@lskslaw.com)>

**Subject:** Franklin v. Elliott

**To:** "alan elliott (ucla) ([alanelliott@g.ucla.edu](mailto:alanelliott@g.ucla.edu))" <[alanelliott@g.ucla.edu](mailto:alanelliott@g.ucla.edu)>

Alan:

Attached for your review:

The DRAFT of the letter I propose to send to Reid Neureiter, after your and Larry???'s review and edits, and after I give Reid a ???heads up??? courtesy call that it is coming his way.

Please let me know if you???'d like to schedule a call, tomorrow afternoon or Thursday, to discuss these.

Best regards,  
Steve

Steven D. Zansberg



1888 Sherman Street  
Suite 370  
Denver, CO 80203  
(303) 376-2409 | Phone  
(303) 376-2401 | Fax  
[www.lskslaw.com](http://www.lskslaw.com)

**From:** Laura Comerford laura.comerford@aon.com  
**Subject:** amazing grace; 27700815 - E&O - Aretha Franklin Claim  
**Date:** May 12, 2017 at 11:37 AM  
**To:** alan elliott (ucla) alanelliott@g.ucla.edu  
**Cc:** Maria Clark maria.clark@aon.com, Laura Comerford laura.comerford@aon.com

LC

Thanks Alan.

Maria call me when you have a chance.

Laura

Laura R. Comerford  
Vice President  
Aon/Albert G. Ruben Insurance Services, Inc.  
171 Madison Avenue, Suite 401  
New York, NY 10016  
Direct Phone: 212-337-4354

---

**From:** alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]  
**Sent:** Friday, May 12, 2017 1:24 PM  
**To:** Laura Comerford  
**Cc:** Maria Clark  
**Subject:** Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim

Dear Laura,

I request that AON go back to Hiscox and have them reconsider providing coverage for the claim originally submitted in 2015.

When Hiscox declined coverage, it was because Hiscox claimed I had, after intensive vetted phone calls, emails and discussions with both Hiscox and with AON, failed to disclose previous issues with Ms. Franklin and that I answered the following question incorrectly:

"Have you suffered any loss or has any claim, whether successful or not, ever been made against you that would be covered by this insurance."

Hiscox and AON specifically directed me to answer the question "no." In discussions I had with both Hiscox's counsel Ted Gerdes, as well as AON's Stephen Carroll, we specifically reviewed the 2011 lawsuit and the personal service contract obtained in 2013 when considering how to answer the question. Thus, the answer was discussed and deliberated with both the carrier and the broker.

Because of the 2013 discovery of the personal service contract, AON/Hiscox vetted the contract and when the question came up, everyone was aware of the prior issues and they were satisfied with the enforceability of the personal service contract, which was evinced in the answer.

Coinciding with the time of Hiscox's exclusion of Aretha Franklin in 2015, I made a deal with Ms. Franklin's counsel that would nullify any issues. Because of this deal, I did not fight Hiscox.

However, after more than 15 months of negotiations, Ms. Franklin has declined two fully negotiated contracts that were approved and generated by and with her counsel. Both offers were OVER and above what Ms. Franklin and her counsel asked for. Ms. Franklin has since fired her counsel and I have no hope that she will accept any offer. Because Ms. Franklin refuses to negotiate any further, this leaves me no other option but to reopen the case in Denver.

The fundamental and virtually singular reason for my Hiscox insurance was because of Ms. Franklin's volatility. Insurance would allow me to defend and enforce Ms. Franklin's contract, which was recently discovered (in 2013) by Warner Films. Hiscox directed me to discuss these matters with Ted Gerdes. I specifically told Mr

2015) by Warner Films. Hiscox directed me to discuss these matters with Ted Gerdes, I specifically told Mr. Gerdes about the 2011 lawsuit, providing him with links in emails to the "cease and desist" settlement which resulted from the lawsuit.

As this film deals with one of the more well known personalities in the world in Ms. Franklin, a woman who is known for her controversial and public disposition and litigious behavior, it is not credible that Hiscox can say, after the intensive application process that we went through, that they had no knowledge.

To remind from where the confusion/untangling emanated:

In 2011, Ms. Franklin filed a very public lawsuit against me, preventing the film from being exhibited.

In 2013, Warner Films discovered Ms. Franklin's personal service contract, which plainly allowed me to distribute the film.

The 2011 lawsuit was settled out of court, I suffered no loss. This 2011 claim was not something that would be covered by this insurance as we now had a signed contract from Ms. Franklin, one that had been used to make and distribute the film.

Importantly, all communications were done with knowledge by Hiscox/AON that the personal service contract and specifically the "indemnification letter" on page 2 of Ms. Franklin's personal service contract (which states: "We do hereby undertake and agree to hold and save you harmless of, from and against any loss, cost, damage or expense which may arise or result from said agreement, and we further agree that we will, upon demand, reimburse you for any cost, liability, or expense which you may incur or any payment which you make in accordance with, or as a result of, such agreement.") would serve as the "insurance for the insurance."

The muddiness of these events (Ms. Franklin suing me and hoping I would never find- or enforce her personal service contract) led my counsel and AON/Hiscox to dutifully consider the question, and it is disingenuous for Hiscox to claim otherwise.

Thank you.

Alan

-----

**phone: 323 988 9692**

**peace and love.**

On May 9, 2017, at 12:40 PM, Laura Comerford <[laura.comerford@aon.com](mailto:laura.comerford@aon.com)> wrote:

Hi Alan

Per our conversation, you would like to go back to Hiscox and have them reconsider providing coverage for the claim originally submitted in 2015. Please confirm via this e-mail and provide any new details and reason behind your disagreement with carrier, specifically that the claim presented was not related to the 2011 claim and why. Maria will then get in contact with Hiscox and see what they say.

Thanks,

Laura

Laura R. Comerford  
Vice President  
Aon/Albert G. Ruben Insurance Services, Inc.  
171 Madison Avenue, Suite 401  
New York, NY 10016  
Direct Phone: 212-337-4354

---

**From:** alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]  
**Sent:** Tuesday, May 09, 2017 12:48 PM  
**To:** Laura Comerford  
**Subject:** Fwd: amazing grace; 27700815

thank you.

-alan

-----

**phone: 323 988 9692**

**peace and love.**

Begin forwarded message:

**From:** alan elliott (ucla) <[alanelliott@g.ucla.edu](mailto:alanelliott@g.ucla.edu)>  
**Subject:** amazing grace; 27700815  
**Date:** May 8, 2017 at 1:56:22 PM PDT  
**To:** Stephen Carroll <[stephen.carroll@aon.com](mailto:stephen.carroll@aon.com)>

hi stephen

i hope this finds you well.

i can use your help please. i need copies of all of AON's communications with hiscox in connection with the underwriting of my 2015-2018 policy.

please let me know.

thank you.

-alan

-----

**phone: 323 988 9692**

**peace and love.**

**From:** Laura Comerford laura.comerford@aon.com  
**Subject:** amazing grace; 27700815 - E&O - Aretha Franklin Claim  
**Date:** May 9, 2017 at 12:40 PM  
**To:** alan elliott (ucla) alanelliott@g.ucla.edu  
**Cc:** Maria Clark maria.clark@aon.com, Laura Comerford laura.comerford@aon.com



Hi Alan

Per our conversation, you would like to go back to Hiscox and have them reconsider providing coverage for the claim originally submitted in 2015. Please confirm via this e-mail and provide any new details and reason behind your disagreement with carrier, specifically that the claim presented was not related to the 2011 claim and why. Maria will then get in contact with Hiscox and see what they say.

Thanks,

Laura

Laura R. Comerford  
Vice President  
Aon/Albert G. Ruben Insurance Services, Inc.  
171 Madison Avenue, Suite 401  
New York, NY 10016  
Direct Phone: 212-337-4354

---

**From:** alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]  
**Sent:** Tuesday, May 09, 2017 12:48 PM  
**To:** Laura Comerford  
**Subject:** Fwd: amazing grace; 27700815

thank you.

-alan

-----

**phone: 323 988 9692**

**peace and love.**

Begin forwarded message:

**From:** alan elliott (ucla) <[alanelliott@g.ucla.edu](mailto:alanelliott@g.ucla.edu)>  
**Subject:** amazing grace; 27700815  
**Date:** May 8, 2017 at 1:56:22 PM PDT  
**To:** Stephen Carroll <[stephen.carroll@aon.com](mailto:stephen.carroll@aon.com)>

hi stephen

i hope this finds you well.

i can use your help please. i need copies of all of AON's communications with hiscox in connection with the underwriting of my 2015-2018 policy.

please let me know.

thank you.

-alan

-----

**phone: 323 988 9692**

**peace and love.**

**From:** Stephen Carroll [stephen.carroll@aon.com](mailto:stephen.carroll@aon.com)  
**Subject:** RE: Amazing Grace  
**Date:** March 11, 2015 at 8:13 AM  
**To:** alan elliott (ucla) [alanelliott@g.ucla.edu](mailto:alanelliott@g.ucla.edu)  
**Cc:** Ramona V. Horne [ramona.horne@aon.com](mailto:ramona.horne@aon.com), George Chignell [georgec@passion-pictures.com](mailto:georgec@passion-pictures.com), john battsek [john@passion-pictures.com](mailto:john@passion-pictures.com), Joe Boyd [boyd1j@yahoo.co.uk](mailto:boyd1j@yahoo.co.uk), Todd W. Musburger [todd@musburger.com](mailto:todd@musburger.com)



Alan: I got the following indication from Axis:

Full/Wide theatrical release:  
\$1m/\$3m \$25k SIR \$15,539 3 year policy with TOIE

Limited theatrical release:  
\$1m/\$3m \$25k SIR \$7,063 3 year term with TOIE

All forms of non-theatrical release:  
\$1m/\$3m \$25k SIR \$4,528 3 year term with TOIE.

Unfortunately on this type of risk we cannot offer music coverage as the artist should have own coverage.

Clearly Hiscox is the way to go. Give me a call to discuss.

Stephen Carroll, V.P.  
Aon/Albert G. Ruben Insurance Services Inc.-New York  
171 Madison Ave., Suite 401  
New York, NY 10016  
Phone: 212-337-4353  
Cell: 914-589-2474  
Fax: 847-953-2692

---

**From:** alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]  
**Sent:** Monday, March 09, 2015 8:02 PM  
**To:** Stephen Carroll  
**Cc:** Ramona V. Horne; George Chignell; john battsek; Joe Boyd; Todd W. Musburger  
**Subject:** Re: Amazing Grace

hey stephen

checking to see if you had an axis quote.

thank you.

-----

phone: 323 988 9692

Sent from a iPhone



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On Mar 4, 2015, at 12:25 PM, Stephen Carroll <[stephen.carroll@aon.com](mailto:stephen.carroll@aon.com)> wrote:

Here is the quote from Hiscox. I am waiting on Axis.

Stephen Carroll, V.P.  
Aon/Albert G. Ruben Insurance Services Inc.-New York  
171 Madison Ave., Suite 401  
New York, NY 10016  
Phone: 212-337-4353  
Cell: 914-589-2474  
Fax: 847-953-2692

---

**From:** alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]  
**Sent:** Wednesday, March 04, 2015 3:24 PM  
**To:** Stephen Carroll  
**Cc:** Ramona V. Horne; George Chignell; john battsek; Joe Boyd; Todd W. Musburger  
**Subject:** Re: Amazing Grace

hey stephen

we are checking in re policy.

please let us know.

thank you.

-----

phone: 323 988 9692

Sent from a iPhone



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On Feb 27, 2015, at 1:42 PM, Stephen Carroll <[stephen.carroll@aon.com](mailto:stephen.carroll@aon.com)> wrote:

Thank you I have forwarded info to underwriters

Thank you... have forwarded info to underwriters

Stephen Carroll, V.P.  
Aon/Albert G. Ruben Insurance Services Inc.-New York  
171 Madison Ave., Suite 401  
New York, NY 10016  
Phone: 212-337-4353  
Cell: 914-589-2474  
Fax: 847-953-2692

---

**From:** alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]  
**Sent:** Friday, February 27, 2015 3:50 PM  
**To:** Stephen Carroll  
**Cc:** Ramona V. Horne; George Chignell; john battsek; Joe Boyd; Todd W. Musburger  
**Subject:** Re: Amazing Grace

hi stephen

please see answers below.

On Feb 27, 2015, at 11:22 AM, Stephen Carroll  
<[stephen.carroll@aon.com](mailto:stephen.carroll@aon.com)> wrote:

So after all this time my underwriter finally responded to the submission and had the following questions. I apologize but would appreciate any clarification you can provide:

1. Is this a documentary, music video or something else?

documentary

2. What is the anticipated distribution/dissemination? theatrical release, TV special, etc...?

theatrical, vod, dvd, television

3. Was it previously produced and released and now they're re-releasing it?

it was (technically) produced by warners.

elements of the project have been released at least twice that we know of:

- 1) the atlantic 25th anniversary film, made with braverman productions <image001.png>
- 2) aretha franklin; the queen of soul (august 22, 1988)  
(<http://www.imdb.com/title/tt0210537/>)

4. If not previously released please advise who produced it and who currently owns the copyright and what agreements are in place with this applicant.

the current iteration of the footage is owned by me with quitclaim from warner bors. films.

5. Did they obtain rights from Warner Brothers?

yes.

6. Did they obtain rights from Atlantic Records?

none needed, as per atlantic/warner music group.

7. Did Aretha Franklin participate in this production?

yes

Stephen Carroll, V.P.  
Aon/Albert G. Ruben Insurance Services Inc.-New York  
171 Madison Ave., Suite 401  
New York, NY 10016  
Phone: 212 227 1252

PHONE: 214-557-4555  
Cell: 914-589-2474  
Fax: 847-953-2692

<Amazing Grace Hiscox Quote.PDF>

**From:** Amanda Roytbak amanda.roytbak@aon.com   
**Subject:** RE: amazing grace confirmation  
**Date:** July 14, 2015 at 11:13 AM  
**To:** Annette Shavuo annette.shavuo@aon.com, alan elliott (ucla) alanelliott@g.ucla.edu  
**Cc:** Stephen Carroll stephen.carroll@aon.com, Todd W. Musburger todd@musburger.com



Hi Alan,  
Please see the attached invoice for the E&O policy.  
Please remit payment. Thank you.

Best Regards,  
Amanda Roytbak  
Assisting Laura Comerford  
Aon/Albert G. Ruben Insurance Services, Inc.  
171 Madison Avenue, Suite 401  
New York, NY 10016  
212.337.4357

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**From:** Annette Shavuo  
**Sent:** Tuesday, July 14, 2015 12:26 PM  
**To:** alan elliott (ucla)  
**Cc:** Stephen Carroll; Todd W. Musburger; Amanda Roytbak  
**Subject:** RE: amazing grace confirmation

Alan,

Amanda will send an invoice shortly.

Thanks,

Annette Shavuo  
Aon/Albert G. Ruben  
171 Madison Avenue, Suite 401  
New York, NY 10016  
Tel: (212) 627-7400 / Direct: (212) 463-5586  
Fax: (212) 633-1457 / Direct: (847) 953-0849

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**From:** alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]

**Sent:** Tuesday, July 14, 2015 10:19 AM

**To:** Annette Shavuo

**Cc:** Stephen Carroll; Todd W. Musburger

**Subject:** Re: amazing grace confirmation

hi Annette

please bill directly to:

Julie Huntsinger

Executive Director

Telluride Film Festival

[\(510\) 665-9494](tel:(510)665-9494)

[juliehuntsinger@mac.com](mailto:juliehuntsinger@mac.com)

they will get you paid today!

thank you.

-----

phone: 323 988 9692

Sent from a iPhone



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On Jul 14, 2015, at 6:30 AM, Annette Shavuo <[annette.shavuo@aon.com](mailto:annette.shavuo@aon.com)> wrote:

Thank you Alan.

Once we receive the check for \$ 5,700 (\$ 5,400 + \$ 300 administration fee), we will request to bind coverage.

Please make check payable to Aon/Albert G. Ruben.

Annette Shavuo  
Aon/Albert G. Ruben  
171 Madison Avenue, Suite 401  
New York, NY 10016  
Tel: (212) 627-7400 / Direct: (212) 463-5586  
Fax: (212) 633-1457 / Direct: (847) 953-0849

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---

**From:** alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]  
**Sent:** Monday, July 13, 2015 5:02 PM  
**To:** Stephen Carroll; Annette Shavuo  
**Cc:** Todd W. Musburger  
**Subject:** amazing grace confirmation

hi stephen and annette and thank you again for your patience and diligence.

attached is my signature for option "b".

please bill directly to:

Julie Huntsinger  
Executive Director  
Telluride Film Festival  
[\(510\) 665-9494](tel:5106659494)  
[juliehuntsinger@mac.com](mailto:juliehuntsinger@mac.com)

## EXECUTIVE SUMMARY

You have asked us to provide you with a new proposal. Our goal is to obtain the appropriate insurance coverage, at the most competitive price. We approached Hiscox who specializes in this type of insurance coverage. Please refer to the Quote Disclosure Report attached, which outlines our commission for the quoted coverage. If you wish to bind coverage as outlined in this proposal, please check the lines of coverage you are accepting and sign the Acknowledgment and Approval of Insured below.

### Acknowledgment and Approval of Insured

We hereby acknowledge receipt and review of the information presented in the New Proposal ("Proposal") dated 7/8/2015 for Errors & Omissions and provided in the attached Quote Disclosure

Report dated 7/8/2015. We hereby instruct Aon/Albert G. Ruben Insurance Services, Inc. (AGR) to bind the insurance program(s) selected by us and understand that our instruction to bind constitutes an acceptance of the terms and conditions and payments described in this Proposal, including ARS U.S. Business Terms. We consent to the procedure whereby Aon will place or renew additional policies we are likely to need in the twelve months following this program inception with the insurer we have selected. We understand that Aon will advise us of any variances in premium rates, coverages, terms or conditions applicable to additional placed policies prior to binding them for our approval.

Coverage	Accept	Decline
Errors & Omissions "Amazing Grace"	X	

Date: 7.13.15 By:  Signature On behalf of Amazing Grace, LLC.

Policy Delivery Via:	Email	Mail	Both

This insurance document is furnished to you as a matter of information for your convenience. It only summarizes the listed proposed policy(ies) and is not intended to reflect all the terms and conditions or exclusions of such proposed policy(ies). Moreover, the information contained in this document reflects proposed coverage as of the effective date(s) of the proposed policy(ies) and does not include subsequent changes. This document is not an insurance policy and does not amend, alter or extend the coverage afforded by the listed proposed policy(ies). The insurance afforded by the listed proposed policy(ies) is subject to all the terms, exclusions and conditions of such policy(ies). The services and placements outlined in this proposal will be provided in accordance with the terms of the notices and policies set forth in the ARS US Business Terms.

thank you.

-alan

-----

**phone: 323 988 9692**

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**INVOICE**



**From:** Stephen Carroll [stephen.carroll@aon.com](mailto:stephen.carroll@aon.com)   
**Subject:** RE: amazing grace confirmation  
**Date:** February 26, 2016 at 12:56 PM  
**To:** alan elliott [alanelliott@g.ucla.edu](mailto:alanelliott@g.ucla.edu)



Stephen Carroll, V.P.  
Aon/Albert G. Ruben Insurance Services Inc.-New York  
171 Madison Ave., Suite 401  
New York, NY 10016  
Phone: 212-337-4353  
**New Cell: 914-588-4290**  
Fax: 847-953-2692

---

**From:** alan elliott [<mailto:alanelliott@g.ucla.edu>]  
**Sent:** Thursday, February 25, 2016 1:58 PM  
**To:** Stephen Carroll  
**Subject:** Re: amazing grace confirmation

hi stephen

can you please send me a copy of the full policy for “amazing grace.” (i can’t find the full policy.)

thank you.

-alan

-----

**phone: 323 988 9692**  
**peace and love.**

<http://songsoundrecord.tumblr.com>

On Jul 21, 2015, at 8:37 AM, Annette Shavuo <[annette.shavuo@aon.com](mailto:annette.shavuo@aon.com)> wrote:

Alan,

We did not receive it yet. Mail is delivered in the afternoon,

Annette Shavuo  
Aon/Albert G. Ruben  
171 Madison Avenue, Suite 401  
New York, NY 10016

NEW YORK, NY 10010

Tel: (212) 627-7400 / Direct: (212) 463-5586

Fax: (212) 633-1457 / Direct: (847) 953-0849

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---

**From:** alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]

**Sent:** Tuesday, July 21, 2015 11:34 AM

**To:** Annette Shavuo

**Subject:** Re: amazing grace confirmation

hi Annette

any sign of the check yet? please let me know.

thank you.

-----

phone: 323 988 9692

Sent from a iPhone



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On Jul 20, 2015, at 2:10 PM, Annette Shavuo <[annette.shavuo@aon.com](mailto:annette.shavuo@aon.com)> wrote:

OK great

Annette Shavuo  
Aon/Albert G. Ruben  
171 Madison Avenue, Suite 401  
New York, NY 10016

Tel: (212) 627-7400 / Direct: (212) 463-5586  
Fax: (212) 633-1457 / Direct: (847) 953-0849

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---

**From:** alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]  
**Sent:** Monday, July 20, 2015 5:00 PM  
**To:** Annette Shavuo  
**Subject:** Fwd: amazing grace confirmation

hi annette- as per below... it should be there tomorrow (we hope).

thank you.

-alan

-----

**phone: 323 988 9692**

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Begin forwarded message:

**From:** Julie Huntsinger <[juliehuntsinger@me.com](mailto:juliehuntsinger@me.com)>  
**Subject:** Re: amazing grace confirmation  
**Date:** July 20, 2015 at 1:55:48 PM PDT  
**To:** "alan elliott (ucla)" <[alanelliott@g.ucla.edu](mailto:alanelliott@g.ucla.edu)>

Hi Alan,

It is en route.

Forgive us- for some reason it was held Thursday- when i expected it to go out- and it went out Friday instead

...to go out and it went out today instead.

Really embarrassed.

Julie Huntsinger  
Executive Director  
Telluride Film Festival  
(510) 665-9494  
[juliehuntsinger@mac.com](mailto:juliehuntsinger@mac.com)  
[www.telluridefilmfestival.org](http://www.telluridefilmfestival.org)  
42nd TELLURIDE FILM FESTIVAL  
September 4-7, 2015

On Jul 20, 2015, at 1:51 PM, alan elliott (ucla)  
<[alanelliott@g.ucla.edu](mailto:alanelliott@g.ucla.edu)> wrote:

hey Julie

Can you pls see if this is en route?

thank you.

-----

phone: 323 988 9692

Sent from a iPhone



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Begin forwarded message:

**From:** Annette Shavuo <[annette.shavuo@aon.com](mailto:annette.shavuo@aon.com)>  
**Date:** July 20, 2015 at 1:27:21 PM PDT  
**To:** "[alanelliott@g.ucla.edu](mailto:alanelliott@g.ucla.edu)" <[alanelliott@g.ucla.edu](mailto:alanelliott@g.ucla.edu)>  
**Subject:** FW: amazing grace confirmation

Alan,

We did not receive the check. Maybe by tomorrow.

Annette Shavuo  
Aon/Albert G. Ruben  
171 Madison Avenue, Suite 401  
New York, NY 10016  
Tel: (212) 627-7400 / Direct: (212) 463-5586  
Fax: (212) 633-1457 / Direct: (847) 953-0849

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---

**From:** Amanda Roytbak  
**Sent:** Tuesday, July 14, 2015 2:31 PM  
**To:** [juliehuntsinger@mac.com](mailto:juliehuntsinger@mac.com)  
**Cc:** Annette Shavuo  
**Subject:** FW: amazing grace confirmation

Hi Julie,  
Attached is the E&O policy invoice.  
Please remit payment. Thank you.

Best Regards,  
Amanda Roytbak  
Assisting Laura Comerford  
Aon/Albert G. Ruben Insurance Services, Inc.  
171 Madison Avenue, Suite 401  
New York, NY 10016  
212.337.4357

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---

**From:** alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]  
**Sent:** Tuesday, July 14, 2015 2:16 PM  
**To:** Amanda Roytbak  
**Cc:** Annette Shavuo; Stephen Carroll; Todd W. Musburger; Julie Huntsinger  
**Subject:** Re: amazing grace confirmation

hi

please bill directly to:

Julie Huntsinger  
Executive Director  
Telluride Film Festival  
[\(510\) 665-9494](tel:(510)665-9494)  
[juliehuntsinger@mac.com](mailto:juliehuntsinger@mac.com)

julie iss cc'd here.

thank you.

-alan

-----

**phone: 323 988 9692**

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On Jul 14, 2015, at 11:13 AM, Amanda Roytbak <[amanda.roytbak@aon.com](mailto:amanda.roytbak@aon.com)> wrote:

please bill directly to:

Julie Huntsinger  
Executive Director  
Telluride Film Festival  
[\(510\) 665-9494](tel:(510)665-9494)  
[juliehuntsinger@mac.co](mailto:juliehuntsinger@mac.com)

m

<E&O Invoice - Choices.pdf>



2700815\_9.pdf

**From:** Annette Shavuo [annette.shavuo@aon.com](mailto:annette.shavuo@aon.com)   
**Subject:** RE: amazing grace confirmation  
**Date:** July 14, 2015 at 6:30 AM  
**To:** alan elliott (ucla) [alanelliott@g.ucla.edu](mailto:alanelliott@g.ucla.edu), Stephen Carroll [stephen.carroll@aon.com](mailto:stephen.carroll@aon.com)  
**Cc:** Todd W. Musburger [todd@musburger.com](mailto:todd@musburger.com)



Thank you Alan.

Once we receive the check for \$ 5,700 (\$ 5,400 + \$ 300 administration fee), we will request to bind coverage.

Please make check payable to Aon/Albert G. Ruben.

Annette Shavuo  
Aon/Albert G. Ruben  
171 Madison Avenue, Suite 401  
New York, NY 10016  
Tel: (212) 627-7400 / Direct: (212) 463-5586  
Fax: (212) 633-1457 / Direct: (847) 953-0849

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---

**From:** alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]  
**Sent:** Monday, July 13, 2015 5:02 PM  
**To:** Stephen Carroll; Annette Shavuo  
**Cc:** Todd W. Musburger  
**Subject:** amazing grace confirmation

hi stephen and annette and thank you again for your patience and diligence.

attached is my signature for option "b".

please bill directly to:

Julie Huntsinger  
Executive Director  
Telluride Film Festival  
[\(510\) 665-9494](tel:(510)665-9494)  
[juliehuntsinger@mac.com](mailto:juliehuntsinger@mac.com)



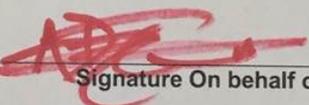
## EXECUTIVE SUMMARY

You have asked us to provide you with a new proposal. Our goal is to obtain the appropriate insurance coverage, at the most competitive price. We approached Hiscox who specializes in this type of insurance coverage. Please refer to the Quote Disclosure Report attached, which outlines our commission for the quoted coverage. If you wish to bind coverage as outlined in this proposal, please check the lines of coverage you are accepting and sign the Acknowledgment and Approval of Insured below.

### Acknowledgment and Approval of Insured

We hereby acknowledge receipt and review of the information presented in the New Proposal ("Proposal") dated 7/8/2015 for Errors & Omissions and provided in the attached Quote Disclosure Report dated 7/8/2015. We hereby instruct Aon/Albert G. Ruben Insurance Services, Inc. (AGR) to bind the insurance program(s) selected by us and understand that our instruction to bind constitutes an acceptance of the terms and conditions and payments described in this Proposal, including ARS U.S. Business Terms. We consent to the procedure whereby Aon will place or renew additional policies we are likely to need in the twelve months following this program inception with the insurer we have selected. We understand that Aon will advise us of any variances in premium rates, coverages, terms or conditions applicable to additional placed policies prior to binding them for our approval.

Coverage	Accept	Decline
Errors & Omissions "Amazing Grace"		

Date: 7.13.15 By:  Signature On behalf of Amazing Grace, LLC.

	Email	Mail	Both
<b>Policy Delivery Via:</b>			

This insurance document is furnished to you as a matter of information for your convenience. It only summarizes the listed proposed policy(ies) and is not intended to reflect all the terms and conditions or exclusions of such proposed policy(ies). Moreover, the information contained in this document reflects proposed coverage as of the effective date(s) of the proposed policy(ies) and does not include subsequent changes. This document is not an insurance policy and does not amend, alter or extend the coverage afforded by the listed proposed policy(ies). The insurance afforded by the listed proposed policy(ies) is subject to all the terms, exclusions and conditions of such policy(ies). The services and placements outlined in this proposal will be provided in accordance with the terms of the notices and policies set forth in the ARS US Business Terms.

thank you.

-alan

-----

**phone: 323 988 9692**

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**From:** Annette Shavuo annette.shavuo@aon.com  
**Subject:** RE: amazing grace coverage  
**Date:** July 21, 2015 at 12:51 PM  
**To:** alan elliott (ucla) alanelliott@g.ucla.edu, Stephen Carroll stephen.carroll@aon.com

---



Alan,

We received check # 9953 in the amount of \$ 5,700. I will request to bind coverage. Once I receive confirmation from our underwriter, I will send to you.

Thank you,

Annette Shavuo  
Aon/Albert G. Ruben  
171 Madison Avenue, Suite 401  
New York, NY 10016  
Tel: (212) 627-7400 / Direct: (212) 463-5586  
Fax: (212) 633-1457 / Direct: (847) 953-0849

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**From:** Annette Shavuo [annette.shavuo@aon.com](mailto:annette.shavuo@aon.com)  
**Subject:** RE: amazing grace coverage  
**Date:** July 17, 2015 at 7:05 AM  
**To:** alan elliott (ucla) [alanelliott@g.ucla.edu](mailto:alanelliott@g.ucla.edu), Stephen Carroll [stephen.carroll@aon.com](mailto:stephen.carroll@aon.com)



Alan,

We have not received payment. When did you send the check?

Annette Shavuo  
Aon/Albert G. Ruben  
171 Madison Avenue, Suite 401  
New York, NY 10016  
Tel: (212) 627-7400 / Direct: (212) 463-5586  
Fax: (212) 633-1457 / Direct: (847) 953-0849

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---

**From:** alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]  
**Sent:** Friday, July 17, 2015 1:40 AM  
**To:** Stephen Carroll; Annette Shavuo  
**Subject:** amazing grace coverage

good morning stephen and Annette

I am checking in to see if the telluride money has come in and if so if you might please forward over asap the new bound coverage (without the exclusion for the corrected #22 question).

please let me know.

thank you.

-----

phone: 323 988 9692

Sent from a iPhone



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**From:** Stephen Carroll [stephen.carroll@aon.com](mailto:stephen.carroll@aon.com)  
**Subject:** RE: amazing grace insurance form  
**Date:** February 5, 2015 at 9:40 AM  
**To:** Alan Elliott [alanelliott@ucla.edu](mailto:alanelliott@ucla.edu)



App is not signed or dated and I need to know who will distribute film.

Stephen Carroll, V.P.  
Aon/Albert G. Ruben Insurance Services Inc.-New York  
171 Madison Ave., Suite 401  
New York, NY 10016  
Phone: 212-337-4353  
Cell: 914-589-2474  
Fax: 847-953-2692

---

**From:** ALAN ELLIOTT [<mailto:alanelliott@g.ucla.edu>] **On Behalf Of** Alan Elliott  
**Sent:** Wednesday, February 04, 2015 1:22 PM  
**To:** Stephen Carroll  
**Cc:** George Chignell; john battsek; Todd W. Musburger  
**Subject:** amazing grace insurance form

hello

attached is the insurance application. please let me know if any adjustments are needed (i left what i didn't know blank).

thank you.

-alan

-----

**phone: 323 988 9692**

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On Feb 2, 2015, at 9:57 AM, Stephen Carroll <[stephen.carroll@aon.com](mailto:stephen.carroll@aon.com)> wrote:

Stephen Carroll, V.P.  
Aon/Albert G. Ruben Insurance Services Inc.-New York  
171 Madison Ave., Suite 401  
New York, NY 10016  
Phone: 212-337-4353  
Cell: 914-589-2474  
Fax: 847-953-2692

---

**From:** ALAN ELLIOTT [<mailto:alanelliott@g.ucla.edu>] **On Behalf Of** Alan Elliott  
**Sent:** Monday, February 02, 2015 12:37 PM  
**To:** Stephen Carroll; Ramona V. Horne  
**Cc:** George Chignell; john battsek; Joe Boyd  
**Subject:** insurance needed!

hello

i need to start the process of getting insurance for my film and john battsek and george chignell suggested we start.

how do we start?

thank you.

-alan

-----

**phone: 323 988 9692**

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<Video Film and Television Producers Application Admitted\_Word1203.doc>

**From:** Ramona Horne [ramona.horne@aon.com](mailto:ramona.horne@aon.com)   
**Subject:** RE: Amazing Grace, LLC E&O #USUUA2700815.15  
**Date:** June 15, 2018 at 7:48 AM  
**To:** alan elliott [Alan@AlanElliott.net](mailto:Alan@AlanElliott.net)

RH

Hi Alan,

As mentioned in my first email. To obtain a renewal quote I need an updated application. Please see attached. I've also attached the expiring as a reference.

Regards,

Ramona Horne

---

AON/Albert G. Ruben Company (New York) Inc.  
171 Madison Avenue, Suite 401  
New York, NY 10016  
Direct Tel: 212-337-4358  
Direct Fax: 847-953-2367  
Email: [ramona.horne@aon.com](mailto:ramona.horne@aon.com)

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---

**From:** alan elliott [<mailto:Alan@AlanElliott.net>]  
**Sent:** Thursday, June 14, 2018 1:45 PM  
**To:** Ramona Horne  
**Subject:** Re: Amazing Grace, LLC E&O #USUUA2700815.15  
**Importance:** High

hi ramona

i am following up on this since i havent heard back since our call the other day.

yes, we will be renewing this. can you please give me the price to reup for 1 yr./3yr/ 5yr or whatever the options may be please.

thank you.

-alan

-----

**phone: 323 988 9692**

**peace and love.**

---



On May 14, 2018, at 9:22 AM, Ramona Horne <[ramona.horne@aon.com](mailto:ramona.horne@aon.com)> wrote:

Good afternoon,

The above mentioned E&O is scheduled to expired on 7/21/2018. In order for us to obtain a renewal quote we need an updated application. Please see attached. I have also attached the expiring application as a reference. If coverage is no longer needed please advise. Thanks.

Regards,

Ramona Horne

---

AON/Albert G. Ruben Company (New York) Inc.  
171 Madison Avenue, Suite 401  
New York, NY 10016  
Direct Tel: 212-337-4358  
Direct Fax: 847-953-2367  
Email: [ramona.horne@aon.com](mailto:ramona.horne@aon.com)

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<Video\_Film\_and\_Television\_Producers\_Application.pdf><amazing grace App- REVISED Q#22 -E&O Video Film and Television Producers....doc>

thank you.

-alan

-----

**phone: 323 988 9692**

peace and love.



Mail  
Attachment.eml



Video\_Film\_and\_  
Televisi...ion.pdf



amazing grace  
App- R...s....doc

**From:** Ramona Horne ramona.horne@aon.com   
**Subject:** Amazing Grace, LLC E&O #USUUA2700815.15  
**Date:** May 14, 2018 at 9:23 AM  
**To:** alan elliott (ucla) alanelliott@g.ucla.edu  
**Cc:** Todd W. Musburger todd@musburger.com

RH

Good afternoon,

The above mentioned E&O is scheduled to expired on 7/21/2018. In order for us to obtain a renewal quote we need an updated application. Please see attached. I have also attached the expiring application as a reference. If coverage is no longer needed please advise. Thanks.

Regards,

Ramona Horne

---

AON/Albert G. Ruben Company (New York) Inc.  
171 Madison Avenue, Suite 401  
New York, NY 10016  
Direct Tel: 212-337-4358  
Direct Fax: 847-953-2367  
Email: [ramona.horne@aon.com](mailto:ramona.horne@aon.com)

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Video\_Film\_and\_  
Televisi...ion.pdf



amazing grace  
App- R...s....doc

**From:** Annette Shavuo [annette.shavuo@aon.com](mailto:annette.shavuo@aon.com)   
**Subject:** RE: Amazing Grace- PLEASE CHECK THIS  
**Date:** July 9, 2015 at 7:56 AM  
**To:** alan elliott [alanelliott@g.ucla.edu](mailto:alanelliott@g.ucla.edu), Stephen Carroll [stephen.carroll@aon.com](mailto:stephen.carroll@aon.com)



Hi Alan,

Thank you for answering Q#22. I will send the revised application to Hiscox. We still need the following in order to bind coverage.

- 1. "Acknowledgment and Approval of Insured" form signed, dated and returned (1st attachment, page 4)**
- 2. Full premium made payable to Aon/Albert G. Ruben.**

Thanks,

Annette Shavuo  
Aon/Albert G. Ruben  
171 Madison Avenue, Suite 401  
New York, NY 10016  
Tel: (212) 627-7400 / Direct: (212) 463-5586  
Fax: (212) 633-1457 / Direct: (847) 953-0849

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---

**From:** alan elliott [<mailto:alanelliott@g.ucla.edu>]  
**Sent:** Wednesday, July 08, 2015 4:38 PM  
**To:** Stephen Carroll; Annette Shavuo  
**Subject:** Fwd: Amazing Grace- PLEASE CHECK THIS

hi stephen

per my conversation with joanne, i would like to bind coverage asap.

i would like, in the coverage, as also discussed with joanne, is for the following to be specifically delineated in the coverage:

- a statement from the hiscox that they are insuring the project, and those involved with the project, from all claims regarding the chain of title to the film

project, from all claims regarding the chain of title to the title.

- that there are no exclusions to the coverage and the term/cost of an extended policy, since the coverage needs to extend for the full length of all agreements.

(of course there are always exclusions for fraud, withholding pertinent information, etc.)

- that the Atlantic records indemnification letter in the warner contract is in effect.

thank you.

-alan

-----  
**phone: [323 988 9692](tel:3239889692)**

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On Mar 4, 2015, at 12:25 PM, Stephen Carroll  
<[stephen.carroll@aon.com](mailto:stephen.carroll@aon.com)> wrote:

Here is the quote from Hiscox. I am waiting on Axis.

Stephen Carroll, V.P.  
Aon/Albert G. Ruben Insurance Services Inc.-New York  
171 Madison Ave., Suite 401  
New York, NY 10016  
Phone: [212-337-4353](tel:2123374353)  
Cell: [914-589-2474](tel:9145892474)  
Fax: [847-953-2692](tel:8479532692)

---

**From:** alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]

**Sent:** Wednesday, March 04, 2015 3:24 PM

**To:** Stephen Carroll

**Cc:** Ramona V. Horne; George Chignell; john battsek; Joe Boyd; Todd W. Musburger

**Subject:** Re: Amazing Grace

hey stephen

we are checking in re policy.

please let us know.

thank you.

-----

phone: [323 988 9692](tel:3239889692)

Sent from a iPhone

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On Feb 27, 2015, at 1:42 PM, Stephen Carroll  
<[stephen.carroll@aon.com](mailto:stephen.carroll@aon.com)> wrote:

Thank you...I have forwarded info to  
underwriters

Stephen Carroll, V.P.  
Aon/Albert G. Ruben Insurance Services Inc.-  
New York  
171 Madison Ave., Suite 401  
New York, NY 10016  
Phone: [212-337-4353](tel:2123374353)  
Cell: [914-589-2474](tel:9145892474)  
Fax: [847-953-2692](tel:8479532692)

---

**From:** alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]  
**Sent:** Friday, February 27, 2015 3:50 PM  
**To:** Stephen Carroll  
**Cc:** Ramona V. Horne; George Chignell; john battsek; Joe  
Boyd; Todd W. Musburger  
**Subject:** Re: Amazing Grace

hi stephen

please see answers below.

On Feb 27, 2015, at 11:22 AM, Stephen  
Carroll <[stephen.carroll@aon.com](mailto:stephen.carroll@aon.com)>  
wrote:

So after all this time my underwriter  
finally responded to the submission

finally responded to the submission and had the following questions. I apologize but would appreciate any clarification you can provide:

1. Is this a documentary, music video or something else?

documentary

2. What is the anticipated distribution/dissemination? theatrical release, TV special, etc...?

theatrical, vod, dvd, television

3. Was it previously produced and released and now they're re-releasing it?

it was (technically) produced by warners.

elements of the project have been released at least twice that we know of:

1) the atlantic 25th anniversary film, made with braverman productions <image001.png>  
2) aretha franklin; the queen of soul (august 22, 1988) (<http://www.imdb.com/title/tt0210537/>)

4. If not previously released please advise who produced it and who currently owns the copyright and what agreements are in place with this applicant.

the current iteration of the footage is owned by me with quitclaim from warner bors. films.

5. Did they obtain rights from Warner Brothers?

yes.

6. Did they obtain rights from Atlantic Records?

none needed, as per atlantic/warner music group.

7. Did Aretha Franklin participate in this production?

yes

Stephen Carroll, V.P.  
Aon/Albert G. Ruben Insurance Services Inc.-  
New York  
171 Madison Ave., Suite 401  
New York, NY 10016  
Phone: [212-337-4353](tel:212-337-4353)  
Cell: [914-589-2474](tel:914-589-2474)  
Fax: [847-953-2692](tel:847-953-2692)

<Amazing Grace Hiscox Quote.PDF>



T&D Insurance  
Propos...O.PDF



**From:** Stephen Carroll [stephen.carroll@aon.com](mailto:stephen.carroll@aon.com)  
**Subject:** RE: Amazing Grace- PLEASE CHECK THIS  
**Date:** July 10, 2015 at 11:54 AM  
**To:** alan elliott (ucla) [alanelliott@g.ucla.edu](mailto:alanelliott@g.ucla.edu)  
**Cc:** Annette Shavuo [annette.shavuo@aon.com](mailto:annette.shavuo@aon.com)



Alan: you didn't sign page 4 or indicate your option selection.

Stephen Carroll, V.P.  
Aon/Albert G. Ruben Insurance Services Inc.-New York  
171 Madison Ave., Suite 401  
New York, NY 10016  
Phone: 212-337-4353  
**New Cell: 914-588-4290**  
Fax: 847-953-2692

---

**From:** alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]  
**Sent:** Friday, July 10, 2015 12:34 PM  
**To:** Stephen Carroll  
**Subject:** Fwd: Amazing Grace- PLEASE CHECK THIS

thank you.

-alan

-----

**phone: 323 988 9692**

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Begin forwarded message:

**From:** Annette Shavuo <[annette.shavuo@aon.com](mailto:annette.shavuo@aon.com)>  
**Subject:** RE: Amazing Grace- PLEASE CHECK THIS  
**Date:** July 9, 2015 at 7:56:00 AM PDT  
**To:** alan elliott <[alanelliott@g.ucla.edu](mailto:alanelliott@g.ucla.edu)>, Stephen Carroll <[stephen.carroll@aon.com](mailto:stephen.carroll@aon.com)>

Hi Alan,

Thank you for answering Q#22. I will send the revised application to Hiscox. We still need the following in order to bind coverage.

**1. "Acknowledgment and Approval of Insured" form signed, dated and returned (1st attachment, page 4)**

2. Full payment made to the Aon/Albert G. Ruben

2. Full premium made payable to Aon/Albert G. Ruben.

Thanks,

Annette Shavuo  
Aon/Albert G. Ruben  
171 Madison Avenue, Suite 401  
New York, NY 10016  
Tel: (212) 627-7400 / Direct: (212) 463-5586  
Fax: (212) 633-1457 / Direct: (847) 953-0849

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---

**From:** alan elliott [<mailto:alanelliott@g.ucla.edu>]  
**Sent:** Wednesday, July 08, 2015 4:38 PM  
**To:** Stephen Carroll; Annette Shavuo  
**Subject:** Fwd: Amazing Grace- PLEASE CHECK THIS

hi stephen

per my conversation with joanne, i would like to bind coverage asap.

i would like, in the coverage, as also discussed with joanne, is for the following to be specifically delineated in the coverage:

- a statement from the hiscox that they are insuring the project, and those involved with the project, from all claims regarding the chain of title to the film.

- that there are no exclusions to the coverage and the term/cost of an extended policy, since the coverage needs to extend for the full length of all agreements.

(of course there are always exclusions for fraud, withholding pertinent information, etc.)

- that the Atlantic records indemnification letter in the warner contract is in effect.

thank you.

-alan

-----

phone: [323 988 9692](tel:3239889692)

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On Mar 4, 2015, at 12:25 PM, Stephen Carroll  
<[stephen.carroll@aon.com](mailto:stephen.carroll@aon.com)> wrote:

Here is the quote from Hiscox. I am waiting on Axis.

Stephen Carroll, V.P.  
Aon/Albert G. Ruben Insurance Services Inc.-New York  
171 Madison Ave., Suite 401  
New York, NY 10016  
Phone: [212-337-4353](tel:2123374353)  
Cell: [914-589-2474](tel:9145892474)  
Fax: [847-953-2692](tel:8479532692)

---

**From:** alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]  
**Sent:** Wednesday, March 04, 2015 3:24 PM  
**To:** Stephen Carroll  
**Cc:** Ramona V. Horne; George Chignell; john battsek; Joe Boyd; Todd W. Musburger  
**Subject:** Re: Amazing Grace

hey stephen

we are checking in re policy.

please let us know.

thank you.

-----

phone: [323 988 9692](tel:3239889692)

Sent from a iPhone

This email... may have been dictated into the iPhone, so please forgive the mistakes... transmission, including any previous messages or attachments to it, contains information that may be proprietary, confidential and/or privileged. If you have received this transmission in error, please delete the original transmission

without making copies, disclosing, distributing, saving or making use of it in any manner (all of which acts are strictly prohibited), and so notify the sender by reply [info@alanelliott.net](mailto:info@alanelliott.net).

On Feb 27, 2015, at 1:42 PM, Stephen Carroll <[stephen.carroll@aon.com](mailto:stephen.carroll@aon.com)> wrote:

Thank you...I have forwarded info to underwriters

Stephen Carroll, V.P.  
Aon/Albert G. Ruben Insurance Services Inc.-  
New York  
171 Madison Ave., Suite 401  
New York, NY 10016  
Phone: [212-337-4353](tel:212-337-4353)  
Cell: [914-589-2474](tel:914-589-2474)  
Fax: [847-953-2692](tel:847-953-2692)

---

**From:** alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]  
**Sent:** Friday, February 27, 2015 3:50 PM  
**To:** Stephen Carroll  
**Cc:** Ramona V. Horne; George Chignell; john battsek; Joe Boyd; Todd W. Musburger  
**Subject:** Re: Amazing Grace

hi stephen

please see answers below.

On Feb 27, 2015, at 11:22 AM, Stephen Carroll <[stephen.carroll@aon.com](mailto:stephen.carroll@aon.com)> wrote:

So after all this time my underwriter finally responded to the submission and had the following questions. I apologize but would appreciate any clarification you can provide:

1. Is this a documentary, music video or something else?

documentary

2. What is the anticipated distribution/dissemination? theatrical release, TV special, etc...?

theatrical, vod, dvd, television

3. Was it previously produced and released and now they're re-releasing it?

it was (technically) produced by warners.

elements of the project have been released at least twice that we know of:

- 1) the atlantic 25th anniversary film, made with braverman productions <image001.png>
- 2) aretha franklin; the queen of soul (august 22, 1988) (<http://www.imdb.com/title/tt0210537/>)

4. If not previously released please advise who produced it and who currently owns the copyright and what agreements are in place with this applicant.

the current iteration of the footage is owned by me with quitclaim from warner bors. films.

5. Did they obtain rights from Warner Brothers?

yes.

6. Did they obtain rights from Atlantic Records?

none needed, as per atlantic/warner music group.

7. Did Aretha Franklin participate in this

production?

yes

Stephen Carroll, V.P.  
Aon/Albert G. Ruben Insurance Services Inc.-  
New York  
171 Madison Ave., Suite 401  
New York, NY 10016  
Phone: [212-337-4353](tel:212-337-4353)  
Cell: [914-589-2474](tel:914-589-2474)  
Fax: [847-953-2692](tel:847-953-2692)

<Amazing Grace Hiscox Quote.PDF>

**From:** Stephen Carroll [stephen.carroll@aon.com](mailto:stephen.carroll@aon.com)  
**Subject:** RE: amazing grace policy 2700815 NEED ASAP  
**Date:** August 31, 2015 at 9:26 AM  
**To:** alan elliott (ucla) [alanelliott@g.ucla.edu](mailto:alanelliott@g.ucla.edu), Annette Shavuo [annette.shavuo@aon.com](mailto:annette.shavuo@aon.com)  
**Cc:** Liesl Copland [LCopland@wmeentertainment.com](mailto:LCopland@wmeentertainment.com), Todd Musburger [todd@musburger.com](mailto:todd@musburger.com)



Alan:

This takes care of stock footage. I need confirmation all music has been cleared to remove exclusion.

Stephen Carroll, V.P.  
Aon/Albert G. Ruben Insurance Services Inc.-New York  
171 Madison Ave., Suite 401  
New York, NY 10016  
Phone: 212-337-4353  
**New Cell: 914-588-4290**  
Fax: 847-953-2692

---

**From:** alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]  
**Sent:** Monday, August 31, 2015 12:06 PM  
**To:** Annette Shavuo; Stephen Carroll  
**Cc:** Liesl Copland; Todd Musburger  
**Subject:** amazing grace policy 2700815 NEED ASAP

hi annette and stephen

we need to get the exclusions for song clearances and stock shots lifted asap so we can get funds today.

thank you.

-alan

-----

**phone: 323 988 9692**

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Begin forwarded message:

**From:** alan elliott (ucla) <[alanelliott@g.ucla.edu](mailto:alanelliott@g.ucla.edu)>  
**Subject:** clearance invoice... to rid policy of exclusion...  
**Date:** August 28, 2015 at 12:25:17 PM PDT  
**To:** Annette Shavuo <[annette.shavuo@aon.com](mailto:annette.shavuo@aon.com)>, "Todd W. Musburger" <[todd@musburger.com](mailto:todd@musburger.com)>  
C: Liesl Copland <[LCopland@wmeentertainment.com](mailto:LCopland@wmeentertainment.com)>, "Todd W. Musburger"

CC: LIESI COPLAND <[LCopland@wmeentertainment.com](mailto:LCopland@wmeentertainment.com)>, TODD W. MUSBURGER  
<[todd@musburger.com](mailto:todd@musburger.com)>

hi again, we need to make sure the exclusions for ALL song clearances is removed.

Re: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post

**From:** Stephen Carroll [stephen.carroll@aon.com](mailto:stephen.carroll@aon.com)   
**Subject:** RE: amazing grace policy 2700815 NEED ASAP  
**Date:** January 27, 2016 at 1:08 PM  
**To:** alan elliott (ucla) [alanelliott@g.ucla.edu](mailto:alanelliott@g.ucla.edu)  
**Cc:** Annette Shavuo [annette.shavuo@aon.com](mailto:annette.shavuo@aon.com), Todd W. Musburger [todd@musburger.com](mailto:todd@musburger.com)



This is all I have to date. Let me know how you wish to proceed.

Stephen Carroll, V.P.  
Aon/Albert G. Ruben Insurance Services Inc.-New York  
171 Madison Ave., Suite 401  
New York, NY 10016  
Phone: 212-337-4353  
**New Cell: 914-588-4290**  
Fax: 847-953-2692

---

**From:** alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]  
**Sent:** Wednesday, January 27, 2016 12:50 PM  
**To:** Stephen Carroll  
**Cc:** Annette Shavuo; Todd W. Musburger  
**Subject:** Re: amazing grace policy 2700815 NEED ASAP

hello stephen

i have been in touch with some attorneys about hiscox's declining of my coverage and, long story short, they find hiscox's position suspect.

i currently have an offer from a film company that would pay \$2.3m- and over the lifetime of the contract (27 years) i believe the value should be at least 5x's that, which is what i may have to walk away from because of hiscox's position currently.

i would like to get your thoughts on how to best challenge hiscox to reinstate the policy asap and/or some referrals to litigators.

thank you.

-alan

-----

**phone: 323 988 9692**  
**peace and love.**

<http://songsoundrecord.tumblr.com>

On Aug 31, 2015, at 10:07 AM, Stephen Carroll <[stephen.carroll@aon.com](mailto:stephen.carroll@aon.com)> wrote:

See below. Exclusion will be removed. Endorsement to follow.

Stephen Carroll, V.P.  
Aon/Albert G. Ruben Insurance Services Inc.-New York  
171 Madison Ave., Suite 401  
New York, NY 10016  
Phone: 212-337-4353  
**New Cell: 914-588-4290**  
Fax: 847-953-2692

---

**From:** Richardson Joanne [<mailto:Joanne.Richardson@Hiscox.com>]  
**Sent:** Monday, August 31, 2015 1:04 PM  
**To:** Stephen Carroll  
**Cc:** Annette Shavuo  
**Subject:** FW: amazing grace policy 2700815 NEED ASAP

Thanks, I'll remove the exclusion.

---

**From:** Stephen Carroll [<mailto:stephen.carroll@aon.com>]  
**Sent:** Monday, August 31, 2015 12:45  
**To:** Richardson Joanne  
**Cc:** Annette Shavuo  
**Subject:** FW: amazing grace policy 2700815 NEED ASAP

Music clearance attached.

Stephen Carroll, V.P.  
Aon/Albert G. Ruben Insurance Services Inc.-New York  
171 Madison Ave., Suite 401  
New York, NY 10016  
Phone: 212-337-4353  
**New Cell: 914-588-4290**  
Fax: 847-953-2692

---

**From:** alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]  
**Sent:** Monday, August 31, 2015 12:37 PM  
**To:** Stephen Carroll  
**Cc:** Annette Shavuo; Liesl Copland; Todd W. Musburger  
**Subject:** Re: amazing grace policy 2700815 NEED ASAP

here you go:

thank you.

-alan

-----

-----

**phone: 323 988 9692**

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On Aug 31, 2015, at 9:26 AM, Stephen Carroll  
<[stephen.carroll@aon.com](mailto:stephen.carroll@aon.com)> wrote:

Alan:

This takes care of stock footage. I need confirmation all music has been cleared to remove exclusion.

Stephen Carroll, V.P.  
Aon/Albert G. Ruben Insurance Services Inc.-New York  
171 Madison Ave., Suite 401  
New York, NY 10016  
Phone: 212-337-4353  
**New Cell: 914-588-4290**  
Fax: 847-953-2692

---

**From:** alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]  
**Sent:** Monday, August 31, 2015 12:06 PM  
**To:** Annette Shavuo; Stephen Carroll  
**Cc:** Liesl Copland; Todd Musburger  
**Subject:** amazing grace policy 2700815 NEED ASAP

hi annette and stephen

we need to get the exclusions for song clearances and stock shots lifted asap so we can get funds today.

thank you.

-alan

-----

**phone: 323 988 9692**

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Begin forwarded message:

Original message:

**From:** alan elliott (ucla) <[alanelliott@g.ucla.edu](mailto:alanelliott@g.ucla.edu)>  
**Subject:** clearance invoice... to rid policy of exclusion...  
**Date:** August 28, 2015 at 12:25:17 PM PDT  
**To:** Annette Shavuo <[annette.shavuo@aon.com](mailto:annette.shavuo@aon.com)>, "Todd W. Musburger" <[todd@musburger.com](mailto:todd@musburger.com)>  
**Cc:** Liesl Copland <[LCopland@wmeentertainment.com](mailto:LCopland@wmeentertainment.com)>, "Todd W. Musburger" <[todd@musburger.com](mailto:todd@musburger.com)>

hi again, we need to make sure the exclusions for ALL song clearances is removed.

Re: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post

---

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<Invoice #1444.pdf>



Amazing Grace  
- Frank...C.PDF

**From:** Stephen Carroll [stephen.carroll@aon.com](mailto:stephen.carroll@aon.com)  
**Subject:** RE: amazing grace policy 2700815 NEED ASAP  
**Date:** August 31, 2015 at 9:11 AM  
**To:** alan elliott (ucla) [alanelliott@g.ucla.edu](mailto:alanelliott@g.ucla.edu), Annette Shavuo [annette.shavuo@aon.com](mailto:annette.shavuo@aon.com)  
**Cc:** Liesl Copland [LCopland@wmeentertainment.com](mailto:LCopland@wmeentertainment.com), Todd Musburger [todd@musburger.com](mailto:todd@musburger.com)



I have sent into underwriter...waiting for response.

Stephen Carroll, V.P.  
Aon/Albert G. Ruben Insurance Services Inc.-New York  
171 Madison Ave., Suite 401  
New York, NY 10016  
Phone: 212-337-4353  
**New Cell: 914-588-4290**  
Fax: 847-953-2692

---

**From:** alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]  
**Sent:** Monday, August 31, 2015 12:06 PM  
**To:** Annette Shavuo; Stephen Carroll  
**Cc:** Liesl Copland; Todd Musburger  
**Subject:** amazing grace policy 2700815 NEED ASAP

hi annette and stephen

we need to get the exclusions for song clearances and stock shots lifted asap so we can get funds today.

thank you.

-alan

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**phone: 323 988 9692**

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**From:** alan elliott (ucla) <[alanelliott@g.ucla.edu](mailto:alanelliott@g.ucla.edu)>  
**Subject:** clearance invoice... to rid policy of exclusion...  
**Date:** August 28, 2015 at 12:25:17 PM PDT  
**To:** Annette Shavuo <[annette.shavuo@aon.com](mailto:annette.shavuo@aon.com)>, "Todd W. Musburger" <[todd@musburger.com](mailto:todd@musburger.com)>  
**Cc:** Liesl Copland <[LCopland@wmeentertainment.com](mailto:LCopland@wmeentertainment.com)>, "Todd W. Musburger" <[todd@musburger.com](mailto:todd@musburger.com)>

hi again we need to make sure the exclusions for ALL song clearances is removed

in again, we need to make sure the exclusions for ALL song clearances is removed.

Re: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post

**From:** Annette Shavuo [annette.shavuo@aon.com](mailto:annette.shavuo@aon.com)  
**Subject:** RE: amazing grace policy.  
**Date:** July 22, 2015 at 7:23 AM  
**To:** alan elliott (ucla) [alanelliott@g.ucla.edu](mailto:alanelliott@g.ucla.edu)



Alan,

I am waiting for the binder first.

Should have soon.

Annette Shavuo  
Aon/Albert G. Ruben  
171 Madison Avenue, Suite 401  
New York, NY 10016  
Tel: (212) 627-7400 / Direct: (212) 463-5586  
Fax: (212) 633-1457 / Direct: (847) 953-0849

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---

**From:** alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]  
**Sent:** Wednesday, July 22, 2015 10:19 AM  
**To:** Annette Shavuo  
**Subject:** amazing grace policy.

hi Annette

good morning. if you could please send over a copy of the policy I could sure use it asap.

thank you.

-----

phone: 323 988 9692

Sent from a iPhone



This email... may have been dictated into the iPhone, so please forgive the mistakes... transmission, including any previous messages or attachments to it, contains information that may be proprietary, confidential and/or privileged. If you have received this transmission in error, please delete the original transmission without making copies, disclosing, distributing, saving or making use of it in any manner (all of which acts are strictly prohibited), and so notify the sender by reply [info@alanelliott.net](mailto:info@alanelliott.net)

strictly prohibited), and so please use sender by reply [info@alapheta.net](mailto:info@alapheta.net).

**From:** Stephen Carroll stephen.carroll@aon.com  
**Subject:** Amazing Grace  
**Date:** February 27, 2015 at 11:22 AM  
**To:** alanelliott@g.ucla.edu



So after all this time my underwriter finally responded to the submission and had the following questions. I apologize but would appreciate any clarification you can provide:

1. Is this a documentary, music video or something else?
2. What is the anticipated distribution/dissemination? theatrical release, TV special, etc...?
3. Was it previously produced and released and now they're re-releasing it?
4. If not previously released please advise who produced it and who currently owns the copyright and what agreements are in place with this applicant.
5. Did they obtain rights from Warner Brothers?
6. Did they obtain rights from Atlantic Records?
7. Did Aretha Franklin participate in this production?

Stephen Carroll, V.P.  
Aon/Albert G. Ruben Insurance Services Inc.-New York  
171 Madison Ave., Suite 401  
New York, NY 10016  
Phone: 212-337-4353  
Cell: 914-589-2474  
Fax: 847-953-2692

**From:** Maria Clark maria.clark@aon.com  
**Subject:** Automatic reply: amazing grace; 27700815 - E&O - Aretha Franklin Claim  
**Date:** May 12, 2017 at 10:24 AM  
**To:** alan elliott (ucla) alanelliott@g.ucla.edu

---



Thank you for your e-mail. Please be advised that I will be out of the office on Friday, May 12th.

**From:** Stephen Carroll [stephen.carroll@aon.com](mailto:stephen.carroll@aon.com)  
**Subject:** Automatic reply: amazing grace confirmation  
**Date:** July 14, 2015 at 7:19 AM  
**To:** alan elliott (ucla) [alanelliott@g.ucla.edu](mailto:alanelliott@g.ucla.edu)

---



I will be out of the office on Tuesday 7/14/15 returning Wednesday 7/15/15. If you need immediate assistance please contact [annette.shavuo@aon.com](mailto:annette.shavuo@aon.com). I will have limited access to e-mail.

**From:** Stephen Carroll [stephen.carroll@aon.com](mailto:stephen.carroll@aon.com)  
**Subject:** Automatic reply: amazing grace follow up  
**Date:** February 2, 2016 at 4:00 PM  
**To:** alan elliott (ucla) [alanelliott@g.ucla.edu](mailto:alanelliott@g.ucla.edu)

---



I will be on vacation February 1-5, 2016. I will have limited access to e-mail. For assistance please contact [annette.shavuo@aon.com](mailto:annette.shavuo@aon.com).

**From:** Stephen Carroll [stephen.carroll@aon.com](mailto:stephen.carroll@aon.com)   
**Subject:** FW: 2700815 Amazing Grace  
**Date:** July 13, 2015 at 8:12 AM  
**To:** alan elliott (ucla) ([alanelliott@g.ucla.edu](mailto:alanelliott@g.ucla.edu)) [alanelliott@g.ucla.edu](mailto:alanelliott@g.ucla.edu)  
**Cc:** Annette Shavuo [annette.shavuo@aon.com](mailto:annette.shavuo@aon.com)



See comments from underwriter at Hiscox. Let me know if you have any questions.

Stephen Carroll, V.P.  
Aon/Albert G. Ruben Insurance Services Inc.-New York  
171 Madison Ave., Suite 401  
New York, NY 10016  
Phone: 212-337-4353  
**New Cell: 914-588-4290**  
Fax: 847-953-2692

---

**From:** Richardson Joanne [<mailto:Joanne.Richardson@Hiscox.com>]  
**Sent:** Monday, July 13, 2015 11:02 AM  
**To:** Stephen Carroll  
**Cc:** Annette Shavuo  
**Subject:** 2700815 Amazing Grace

Per the insured's request, I want to confirm that we are aware of the contract attached and that the insured is relying on this contract/document to make this film. We have vetted its validity and are satisfied it is acceptable and therefore have not placed any special exclusions on the policy that would prohibit coverage under the policy. Of course, there are standard insurance policy terms, conditions and exclusions that apply regardless and we could never confirm or deny any coverage in advance as each and every claims scenario is unique and must be evaluated on the specific facts and circumstances of the case. But again, the quote does not contain a chain of title exclusion or any other specific exclusion involving this project and we recognize the Atlantic records indemnification letter in the Warner contract to be valid. Please note we have not yet cleared the title, as a title report and legal opinion has not been received to date.

Please let me know if you have any further questions.

Best,  
Joanne

**Joanne Richardson, CPCU**  
Media & Entertainment Practice Leader  
Hiscox Partner  
Hiscox USA  
T 646.452.2355  
M 646.823.8092  
[joanne.richardson@hiscox.com](mailto:joanne.richardson@hiscox.com)  
Connect with Hiscox online  
Web [www.hiscoxbroker.com](http://www.hiscoxbroker.com)  
Twitter [@Hiscox\\_USA](https://twitter.com/Hiscox_USA)

---

**From:** Stephen Carroll [<mailto:stephen.carroll@aon.com>]  
**Sent:** Thursday, July 09, 2015 3:11 PM  
**To:** Richardson Joanne  
**Cc:** Annette Shavuo  
**Subject:** FW: Favorites

Attached is the contract Alan Elliott at Amazing Grace wanted you to acknowledge. I will be sending a bind order to you shortly.

Stephen Carroll, V.P.  
Aon/Albert G. Ruben Insurance Services Inc.-New York  
171 Madison Ave., Suite 401  
New York, NY 10016  
Phone: 212-337-4353  
**New Cell: 914-588-4290**  
Fax: 847-953-2692

---

**From:** alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]  
**Sent:** Thursday, July 09, 2015 2:37 PM  
**To:** Stephen Carroll  
**Subject:** Favorites

[http://alsrecordsandtapes.com/amazinglaw/wbdocs/4-1-1968%20Aretha%20Franklin%20Recording%20Agreement%20\(Atlantic%20and%20Warner%20Bros.%20Seven%20Arts\).pdf](http://alsrecordsandtapes.com/amazinglaw/wbdocs/4-1-1968%20Aretha%20Franklin%20Recording%20Agreement%20(Atlantic%20and%20Warner%20Bros.%20Seven%20Arts).pdf)

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4-1-1968  
Aretha...ts).pdf

thank you.

-----  
phone: 323 988 9692

-----  
Sent from a iPhone



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**From:** Annette Shavuo [annette.shavuo@aon.com](mailto:annette.shavuo@aon.com)   
**Subject:** FW: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post  
**Date:** July 22, 2015 at 12:32 PM  
**To:** [alanelliott@g.ucla.edu](mailto:alanelliott@g.ucla.edu)  
**Cc:** Stephen Carroll [stephen.carroll@aon.com](mailto:stephen.carroll@aon.com)



Alan,

The Errors & Omissions' for "**Amazing Grace**" is bound for the period of 7/21/2015 to 7/21/2018. Here's a copy of the signed binder for your files.

Once the following subjectivities have been satisfactorily met, the underwriter will issue the policy:

1. Currently signed and dated application, by July 29, 2015 – attached application was not signed.
2. Per Q# 22 on the application, confirmation that:
  - 1) the stock shot" of Los Angeles which comes from Corbis has been finalized and all rights obtained
  - 2) the publishing of some songs you mention have yet to be negotiated have all been finalized and all music rights have been obtained.

Upon receipt and review of this we can consider removing the exclusion.

Thank you

Annette Shavuo  
Aon/Albert G. Ruben  
171 Madison Avenue, Suite 401  
New York, NY 10016  
Tel: (212) 627-7400 / Direct: (212) 463-5586  
Fax: (212) 633-1457 / Direct: (847) 953-0849

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Binder - EO - App- REVISED  
15-18...ce.pdf Q#22 -...03.doc

**From:** Annette Shavuo [annette.shavuo@aon.com](mailto:annette.shavuo@aon.com)   
**Subject:** FW: amazing grace confirmation  
**Date:** July 20, 2015 at 1:27 PM  
**To:** [alanelliott@g.ucla.edu](mailto:alanelliott@g.ucla.edu)



Alan,

We did not receive the check. Maybe by tomorrow.

Annette Shavuo  
Aon/Albert G. Ruben  
171 Madison Avenue, Suite 401  
New York, NY 10016  
Tel: (212) 627-7400 / Direct: (212) 463-5586  
Fax: (212) 633-1457 / Direct: (847) 953-0849

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---

**From:** Amanda Roytbak  
**Sent:** Tuesday, July 14, 2015 2:31 PM  
**To:** [juliehuntsinger@mac.com](mailto:juliehuntsinger@mac.com)  
**Cc:** Annette Shavuo  
**Subject:** FW: amazing grace confirmation

Hi Julie,  
Attached is the E&O policy invoice.  
Please remit payment. Thank you.

Best Regards,  
Amanda Roytbak  
Assisting Laura Comerford  
Aon/Albert G. Ruben Insurance Services, Inc.  
171 Madison Avenue, Suite 401  
New York, NY 10016  
212.337.4357

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**From:** alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]  
**Sent:** Tuesday, July 14, 2015 2:16 PM

**To:** Amanda Roytbak  
**Cc:** Annette Shavuo; Stephen Carroll; Todd W. Musburger; Julie Huntsinger  
**Subject:** Re: amazing grace confirmation

hi

please bill directly to:

Julie Huntsinger  
Executive Director  
Telluride Film Festival  
[\(510\) 665-9494](tel:(510)665-9494)  
[juliehuntsinger@mac.com](mailto:juliehuntsinger@mac.com)

julie iss cc'd here.

thank you.

-alan

-----

**phone: 323 988 9692**

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On Jul 14, 2015, at 11:13 AM, Amanda Roytbak <[amanda.roytbak@aon.com](mailto:amanda.roytbak@aon.com)> wrote:

please bill directly to:

Julie Huntsinger  
Executive Director  
Telluride Film Festival  
[\(510\) 665-9494](tel:(510)665-9494)  
[juliehuntsinger@mac.com](mailto:juliehuntsinger@mac.com)



From: **Annette Shavuo** [annette.shavuo@aon.com](mailto:annette.shavuo@aon.com)   
Subject: FW: Amazing Grace- E&O  
Date: July 8, 2015 at 12:35 PM  
To: [alanelliott@g.ucla.edu](mailto:alanelliott@g.ucla.edu)



Alan,

Thank you for the completed E&O application for “**Amazing Grace**”.  
We approached Hiscox for a quote due to their underwriting experience and familiarity with this class of business.  
Quote will follow shortly.

## **ARS US NEW STRATEGY ACKNOWLEDGEMENT EMAIL**

This email will confirm the New Strategy Plan for Errors & Omissions' effective TBD. The attached preliminary Quote Disclosure Report lists the carriers and intermediaries we will approach on your behalf and the estimated the compensation, where applicable, that ARS or any affiliated Aon intermediaries may earn where that information is available at this stage. I will keep you apprised of any changes to the New Strategy Plan that may occur during the new process. Thank you for allowing Aon Risk Services to be of service to Amazing Grace, LLC.

Information about Aon's contractual agreements and ownership interest, if any, in the insurers listed in the QDR through Aon's public website, [http://www.aon.com/market\\_relationships](http://www.aon.com/market_relationships).

Should you have any questions, please contact our office.

Thank you,

Annette Shavuo  
Aon/Albert G. Ruben  
171 Madison Avenue, Suite 401  
New York, NY 10016  
Tel: (212) 627-7400 / Direct: (212) 463-5586  
Fax: (212) 633-1457 / Direct: (847) 953-0849

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---

**From:** Stephen Carroll  
**Sent:** Wednesday, July 08, 2015 3:30 PM  
**To:** Annette Shavuo  
**Subject:** FW: Amazing Grace- PLEASE CHECK THIS

Stephen Carroll, V.P.  
Aon/Albert G. Ruben Insurance Services Inc.-New York  
171 Madison Ave., Suite 401  
New York, NY 10016  
Phone: 212-337-4353  
**New Cell: 914-588-4290**  
Fax: 847-953-2692

---

**From:** alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]  
**Sent:** Tuesday, July 07, 2015 12:31 PM  
**To:** Stephen Carroll  
**Cc:** Richardson Joanne; Todd W. Musburger  
**Subject:** Fwd: Amazing Grace- PLEASE CHECK THIS

hi stephen

per my conversation with joanne, i would like to bind coverage asap.

i would like, in the coverage, as also discussed with joanne, is for the following to be specifically delineated in the coverage:

- a statement from the hiscox that they are insuring the project, and those involved with the project, from all claims regarding the chain of title to the film.
- that there are no exclusions to the coverage and the term/cost of an extended policy, since the coverage needs to extend for the full length of all agreements.

(of course there are always exclusions for fraud, withholding pertinent information, etc.)

- that the Atlantic records indemnification letter in the warner contract is in effect.

thank you.

-alan

-----

**phone: [323 988 9692](tel:3239889692)**

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On Mar 4, 2015, at 12:25 PM, Stephen Carroll  
<[stephen.carroll@aon.com](mailto:stephen.carroll@aon.com)> wrote:

Here is the quote from Hiscox. I am waiting on Axis.

Stephen Carroll, V.P.  
Aon/Albert G. Ruben Insurance Services Inc.-New York  
171 Madison Ave., Suite 401  
New York, NY 10016  
Phone: [212-337-4353](tel:212-337-4353)  
Cell: [914-589-2474](tel:914-589-2474)  
Fax: [847-953-2692](tel:847-953-2692)

---

**From:** alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]  
**Sent:** Wednesday, March 04, 2015 3:24 PM  
**To:** Stephen Carroll  
**Cc:** Ramona V. Horne; George Chignell; john battsek; Joe Boyd; Todd W. Musburger  
**Subject:** Re: Amazing Grace

hey stephen

we are checking in re policy.

please let us know.

thank you.

-----  
phone: [323 988 9692](tel:323-988-9692)

Sent from a iPhone

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On Feb 27, 2015, at 1:42 PM, Stephen Carroll  
<[stephen.carroll@aon.com](mailto:stephen.carroll@aon.com)> wrote:

Thank you...I have forwarded info to  
underwriters

Stephen Carroll, V.P.  
Aon/Albert G. Ruben Insurance Services Inc.-  
New York  
171 Madison Ave., Suite 401  
New York, NY 10016  
Phone: [212-337-4353](tel:212-337-4353)  
Cell: [914-589-2474](tel:914-589-2474)  
Fax: [847-953-2692](tel:847-953-2692)

---

**From:** alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]  
**Sent:** Friday, February 27, 2015 3:50 PM  
**To:** Stephen Carroll  
**Cc:** Ramona V. Horne; George Chignell; john battsek; Joe  
Boyd; Todd W. Musburger  
**Subject:** Re: Amazing Grace

hi stephen

please see answers below.

On Feb 27, 2015, at 11:22 AM, Stephen  
Carroll <[stephen.carroll@aon.com](mailto:stephen.carroll@aon.com)>  
wrote:

So after all this time my underwriter  
finally responded to the submission  
and had the following questions. I  
apologize but would appreciate any  
clarification you can provide:

1. Is this a documentary, music  
video or something else?

documentary

2. What is the anticipated  
distribution/dissemination? theatrical release,  
TV special, etc...?

theatrical, vod, dvd, television

3. Was it previously produced and released

and now they're re-releasing it?

it was (technically) produced by warners.

elements of the project have been released at least twice that we know of:

- 1) the atlantic 25th anniversary film, made with braverman productions <image001.png>
- 2) aretha franklin; the queen of soul (august 22, 1988) (<http://www.imdb.com/title/tt0210537/>)

4. If not previously released please advise who produced it and who currently owns the copyright and what agreements are in place with this applicant.

the current iteration of the footage is owned by me with quitclaim from warner bors. films.

5. Did they obtain rights from Warner Brothers?

yes.

6. Did they obtain rights from Atlantic Records?

none needed, as per atlantic/warner music group.

7. Did Aretha Franklin participate in this production?

yes

Stephen Carroll, V.P.  
Aon/Albert G. Ruben Insurance Services Inc.-  
New York  
171 Madison Ave., Suite 401  
New York, NY 10016  
Phone: [212-337-4353](tel:212-337-4353)  
Cell: [914-589-2474](tel:914-589-2474)  
Fax: [914-252-2602](tel:914-252-2602)

Fax: [041-955-2092](tel:041-955-2092)

<Amazing Grace Hiscox Quote.PDF>



QDR AGR  
Strateg...1 v2.xls

**From:** Stephen Carroll [stephen.carroll@aon.com](mailto:stephen.carroll@aon.com)   
**Subject:** FW: amazing grace policy 2700815 NEED ASAP  
**Date:** August 31, 2015 at 10:07 AM  
**To:** alan elliott (ucla) ([alanelliott@g.ucla.edu](mailto:alanelliott@g.ucla.edu)) [alanelliott@g.ucla.edu](mailto:alanelliott@g.ucla.edu)  
**Cc:** Annette Shavuo [annette.shavuo@aon.com](mailto:annette.shavuo@aon.com)



See below. Exclusion will be removed. Endorsement to follow.

Stephen Carroll, V.P.  
Aon/Albert G. Ruben Insurance Services Inc.-New York  
171 Madison Ave., Suite 401  
New York, NY 10016  
Phone: 212-337-4353  
**New Cell: 914-588-4290**  
Fax: 847-953-2692

---

**From:** Richardson Joanne [<mailto:Joanne.Richardson@Hiscox.com>]  
**Sent:** Monday, August 31, 2015 1:04 PM  
**To:** Stephen Carroll  
**Cc:** Annette Shavuo  
**Subject:** FW: amazing grace policy 2700815 NEED ASAP

Thanks, I'll remove the exclusion.

---

**From:** Stephen Carroll [<mailto:stephen.carroll@aon.com>]  
**Sent:** Monday, August 31, 2015 12:45  
**To:** Richardson Joanne  
**Cc:** Annette Shavuo  
**Subject:** FW: amazing grace policy 2700815 NEED ASAP

Music clearance attached.

Stephen Carroll, V.P.  
Aon/Albert G. Ruben Insurance Services Inc.-New York  
171 Madison Ave., Suite 401  
New York, NY 10016  
Phone: 212-337-4353  
**New Cell: 914-588-4290**  
Fax: 847-953-2692

---

**From:** alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]  
**Sent:** Monday, August 31, 2015 12:37 PM  
**To:** Stephen Carroll  
**Cc:** Annette Shavuo; Liesl Copland; Todd W. Musburger  
**Subject:** Re: amazing grace policy 2700815 NEED ASAP

here you go:

thank you

thank you.

-alan

-----

**phone: 323 988 9692**

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On Aug 31, 2015, at 9:26 AM, Stephen Carroll <[stephen.carroll@aon.com](mailto:stephen.carroll@aon.com)> wrote:

Alan:

This takes care of stock footage. I need confirmation all music has been cleared to remove exclusion.

Stephen Carroll, V.P.  
Aon/Albert G. Ruben Insurance Services Inc.-New York  
171 Madison Ave., Suite 401  
New York, NY 10016  
Phone: 212-337-4353  
**New Cell: 914-588-4290**  
Fax: 847-953-2692

---

**From:** alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]

**Sent:** Monday, August 31, 2015 12:06 PM

**To:** Annette Shavuo; Stephen Carroll

**Cc:** Liesl Copland; Todd Musburger

**Subject:** amazing grace policy 2700815 NEED ASAP

hi annette and stephen

we need to get the exclusions for song clearances and stock shots lifted asap so we can get funds today.

thank you.

-alan

-----

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Begin forwarded message:

**From:** alan elliott (ucla) <[alanelliott@g.ucla.edu](mailto:alanelliott@g.ucla.edu)>  
**Subject:** clearance invoice... to rid policy of exclusion...  
**Date:** August 28, 2015 at 12:25:17 PM PDT  
**To:** Annette Shavuo <[annette.shavuo@aon.com](mailto:annette.shavuo@aon.com)>, "Todd W. Musburger" <[todd@musburger.com](mailto:todd@musburger.com)>  
**Cc:** Liesl Copland <[LCopland@wmeentertainment.com](mailto:LCopland@wmeentertainment.com)>, "Todd W. Musburger" <[todd@musburger.com](mailto:todd@musburger.com)>

hi again, we need to make sure the exclusions for ALL song clearances is removed.

Re: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post

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The Rights Workshop, Inc.  
1800 Bryant Street, Suite 104  
San Francisco, CA 94110  
  
(415) 561-3333  
[billing@rightsworkshop.com](mailto:billing@rightsworkshop.com)  
<http://www.rightsworkshop.com>

### Invoice

Date	Invoice #
08/18/2015	1444
Terms	Due Date
Net 10	08/28/2015

Bill To
Julie Huntsinger Telluride Film Festival 800 Jones Street Berkeley, CA 94710

Amount Due	Enclosed
\$5,250.00	

-----  
Please detach top portion and return with your payment.  
-----

Project
Amazing Grace

Service	Description	Quantity	Rate	Amount
Music Clearance (Part B)	• Contract procurement, review & admin	7	250.00	1,750.00
License Fee	<ul style="list-style-type: none"> <li>• Music license fees</li> <li>• Holy Holy, How I Got Over, Precious Lord Take My Hand, You've Got a Friend, My Sweet Lord,</li> <li>• Old Landmark, Mary Don't You Weep</li> </ul>	7	500.00	3,500.00
Thank you for your business. Please note Federal ID#: 42-1655690.			Total	\$5,250.00

**From:** Stephen Carroll [stephen.carroll@aon.com](mailto:stephen.carroll@aon.com)   
**Subject:** RE: insurance needed!  
**Date:** February 2, 2015 at 9:57 AM  
**To:** Alan Elliott [alanelliott@ucla.edu](mailto:alanelliott@ucla.edu)



Stephen Carroll, V.P.  
Aon/Albert G. Ruben Insurance Services Inc.-New York  
171 Madison Ave., Suite 401  
New York, NY 10016  
Phone: 212-337-4353  
Cell: 914-589-2474  
Fax: 847-953-2692

---

**From:** ALAN ELLIOTT [<mailto:alanelliott@g.ucla.edu>] **On Behalf Of** Alan Elliott  
**Sent:** Monday, February 02, 2015 12:37 PM  
**To:** Stephen Carroll; Ramona V. Horne  
**Cc:** George Chignell; john battsek; Joe Boyd  
**Subject:** insurance needed!

hello

i need to start the process of getting insurance for my film and john battsek and george chignell suggested we start.

how do we start?

thank you.

-alan

-----

**phone: 323 988 9692**

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Video Film and  
Televisi...03.doc

**From:** Annette Shavuo [annette.shavuo@aon.com](mailto:annette.shavuo@aon.com)  
**Subject:** RE: MAIL CALL! Re: amazing grace confirmation  
**Date:** July 21, 2015 at 12:11 PM  
**To:** alan elliott (ucla) [alanelliott@g.ucla.edu](mailto:alanelliott@g.ucla.edu)



Alan,

The mail has not come in yet. When it does, I will let you know

Annette Shavuo  
Aon/Albert G. Ruben  
171 Madison Avenue, Suite 401  
New York, NY 10016  
Tel: (212) 627-7400 / Direct: (212) 463-5586  
Fax: (212) 633-1457 / Direct: (847) 953-0849

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**From:** alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]  
**Sent:** Tuesday, July 21, 2015 3:08 PM  
**To:** Annette Shavuo  
**Subject:** MAIL CALL! Re: amazing grace confirmation

hi annette-

just checking in!

thank you.

-alan

-----

**phone: 323 988 9692**

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On Jul 21, 2015, at 8:37 AM, Annette Shavuo <[annette.shavuo@aon.com](mailto:annette.shavuo@aon.com)>  
wrote:

Alan,

We did not receive it yet. Mail is delivered in the afternoon,

Annette Shavuo  
Aon/Albert G. Ruben  
171 Madison Avenue, Suite 401  
New York, NY 10016  
Tel: (212) 627-7400 / Direct: (212) 463-5586  
Fax: (212) 633-1457 / Direct: (847) 953-0849

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**From:** alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]  
**Sent:** Tuesday, July 21, 2015 11:34 AM  
**To:** Annette Shavuo  
**Subject:** Re: amazing grace confirmation

hi Annette

any sign of the check yet? please let me know.

thank you.

-----

phone: 323 988 9692

Sent from a iPhone



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On Jul 20, 2015, at 2:10 PM, Annette Shavuo <[annette.shavuo@aon.com](mailto:annette.shavuo@aon.com)> wrote:

OK great

Annette Shavuo  
Aon/Albert G. Ruben  
171 Madison Avenue, Suite 401  
New York, NY 10016  
Tel: (212) 627-7400 / Direct: (212) 463-5586  
Fax: (212) 633-1457 / Direct: (847) 953-0849

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**From:** alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]  
**Sent:** Monday, July 20, 2015 5:00 PM  
**To:** Annette Shavuo  
**Subject:** Fwd: amazing grace confirmation

hi annette- as per below... it should be there tomorrow (we hope).

thank you.

-alan

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**phone: 323 988 9692**

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Begin forwarded message:

**From:** Julie Huntsinger <[juliehuntsinger@me.com](mailto:juliehuntsinger@me.com)>  
**Subject:** Re: amazing grace confirmation

**Subject:** Re: amazing grace confirmation

**Date:** July 20, 2015 at 1:55:48 PM PDT

**To:** "alan elliott (ucla)" <[alanelliott@g.ucla.edu](mailto:alanelliott@g.ucla.edu)>

Hi Alan,

It is en route.

Forgive us- for some reason it was held Thursday- when i expected it to go out- and it went out Friday instead.

Really embarrassed.

Julie Huntsinger  
Executive Director  
Telluride Film Festival  
(510) 665-9494  
[juliehuntsinger@mac.com](mailto:juliehuntsinger@mac.com)  
[www.telluridefilmfestival.org](http://www.telluridefilmfestival.org)  
42nd TELLURIDE FILM FESTIVAL  
September 4-7, 2015

On Jul 20, 2015, at 1:51 PM, alan elliott (ucla)  
<[alanelliott@g.ucla.edu](mailto:alanelliott@g.ucla.edu)> wrote:

hey Julie

Can you pls see if this is en route?

thank you.

-----

phone: 323 988 9692

Sent from a iPhone



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Begin forwarded message:

**From:** Annette Shavuo <[annette.shavuo@aon.com](mailto:annette.shavuo@aon.com)>  
**Date:** July 20, 2015 at 1:27:21 PM PDT  
**To:** "[alanelliott@g.ucla.edu](mailto:alanelliott@g.ucla.edu)" <[alanelliott@g.ucla.edu](mailto:alanelliott@g.ucla.edu)>  
**Subject: FW: amazing grace confirmation**

Alan,

We did not receive the check. Maybe by tomorrow.

Annette Shavuo  
Aon/Albert G. Ruben  
171 Madison Avenue, Suite 401  
New York, NY 10016  
Tel: (212) 627-7400 / Direct: (212) 463-5586  
Fax: (212) 633-1457 / Direct: (847) 953-0849

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**From:** Amanda Roytbak  
**Sent:** Tuesday, July 14, 2015 2:31 PM  
**To:** [juliehuntsinger@mac.com](mailto:juliehuntsinger@mac.com)  
**Cc:** Annette Shavuo  
**Subject:** FW: amazing grace confirmation

Hi Julie,  
Attached is the E&O policy invoice.  
Please remit payment. Thank you.

Best Regards,  
Amanda Roytbak  
Assisting Laura Comerford  
Aon/Albert G. Ruben Insurance Services, Inc.  
171 Madison Avenue, Suite 401  
New York, NY 10016  
212.337.4357

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**From:** alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]  
**Sent:** Tuesday, July 14, 2015 2:16 PM  
**To:** Amanda Roytbak  
**Cc:** Annette Shavuo; Stephen Carroll; Todd W. Musburger;  
Julie Huntsinger  
**Subject:** Re: amazing grace confirmation

hi

please bill directly to:

Julie Huntsinger  
Executive Director  
Telluride Film Festival  
[\(510\) 665-9494](tel:(510)665-9494)  
[juliehuntsinger@mac.com](mailto:juliehuntsinger@mac.com)

julie iss cc'd here.

thank you.

-alan

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**phone: 323 988 9692**

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On Jul 14, 2015, at 11:13 AM, Amanda Roytbak <[amanda.roytbak@aon.com](mailto:amanda.roytbak@aon.com)> wrote:

please bill directly to:

please bill directly to.

Julie Huntsinger  
Executive Director  
Telluride Film Festival  
[\(510\) 665-9494](tel:(510)665-9494)  
[juliehuntsinger@mac.co](mailto:juliehuntsinger@mac.com)  
[m](#)

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