

From: Todd Musburger todd@musburger.com
Subject: Re: 2700815 Amazing Grace
Date: July 13, 2015 at 8:22 AM
To: alan elliott (ucla) alanelliott@g.ucla.edu

TM

They had me right up to the last sentence ... My call went to Vm but in view of letter I will not contact him ...half a loaf ...

IPhone Transmission Please excuse Typos & Peculiar abbreviations

On Jul 13, 2015, at 5:17 AM, alan elliott (ucla) <alanelliott@g.ucla.edu> wrote:

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.

Begin forwarded message:

From: Stephen Carroll <stephen.carroll@aon.com>
Date: July 13, 2015 at 8:12:25 AM PDT
To: "alan elliott (ucla)" (alanelliott@g.ucla.edu) <alanelliott@g.ucla.edu>
Cc: Annette Shavuo <annette.shavuo@aon.com>
Subject: FW: 2700815 Amazing Grace

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 claim 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

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,
Joann

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

<image003.png>

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)

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. No one else is authorised to distribute, forward, print, copy or act upon any information contained in this email. If you have received this email in error, please notify the sender.

Hiscox Syndicates Ltd and Hiscox Insurance Company Ltd are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority. Hiscox Underwriting Limited, Hiscox Europe Underwriting Limited and Hiscox ASM Limited are authorised and regulated by the Financial Conduct Authority. Hiscox plc is a company registered in England and Wales under company registration number 2837811 and registered office at 1 Great St Helen's, London EC3A 6HX.

<4-1-1968 Aretha Franklin Recording Agreement (Atlantic and Warner Bros. Seven Arts).pdf>

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.

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Fwd: 2700815 Amazing Grace
Date: July 13, 2015 at 9:27 AM
To: Ted Hope ted.hope@amazonstudios.com



definitive. (my lawyers wanted this to be crystal clear... in writing- it is now.)

(!!!)

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.

Begin forwarded message:

From: Stephen Carroll <stephen.carroll@aon.com>
Date: July 13, 2015 at 8:12:25 AM PDT
To: "alan elliott (ucla)" (alanelliott@g.ucla.edu) <alanelliott@g.ucla.edu>
Cc: Annette Shavuo <annette.shavuo@aon.com>
Subject: FW: 2700815 Amazing Grace

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 aware of the contract attached and that the insured is relying on this contract/document to make this film. We have vetted it's 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 exclusion that apply regardless and we could never confirm or deny any coverage in advance as each and every claims sencerio 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 tile 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,
Joann

Joanne Richardson, CPCU
Media & Entertainment Practice Leader
Hiscox Partner
Hiscox USA
T 646.452.2355
M 646.823.8092
joanne.richardson@hiscox.com
Connect with Hiscox online
Web 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)

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. No one else is authorised to distribute, forward, print, copy or act upon any information contained in this email. If you have received this email in error, please notify the sender.

Hiscox Syndicates Ltd and Hiscox Insurance Company Ltd are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority. Hiscox Underwriting Limited, Hiscox Europe Underwriting Limited and Hiscox ASM Limited are authorised and regulated by the Financial Conduct Authority. Hiscox plc is a company registered in England and Wales under company registration number 2837811 and registered office at 1 Great St Helen's, London EC3A 6HX.



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

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.

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Fwd: 2700815 Amazing Grace
Date: September 4, 2015 at 7:34 AM
To: Tom Luddy tom.luddy@gmail.com, llichter@ligna.com, Julie Huntsinger juliehuntsinger@me.com
Cc: Tom McGuire tmcguire@wmeentertainment.com, Todd W. Musburger todd@musburger.com



I will send over a link to Aretha's contract re: below in a minute. meantime please see insurers' notes below.

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.

Begin forwarded message:

From: Stephen Carroll <stephen.carroll@aon.com>
Date: July 13, 2015 at 9:12:25 AM MDT
To: "alan elliott (ucla)" (alanelliott@g.ucla.edu) <alanelliott@g.ucla.edu>
Cc: Annette Shavuo <annette.shavuo@aon.com>
Subject: FW: 2700815 Amazing Grace

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 exclusion 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,
Joann

Joanne Richardson, CPCU
Media & Entertainment Practice Leader
Hiscox Partner
Hiscox USA
T 646.452.2355
M 646.823.8092
joanne.richardson@hiscox.com
Connect with Hiscox online
Web 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)

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. No one else is authorised to distribute, forward, print, copy or act upon any information contained in this email. If you have received this email in error, please notify the sender.

Hiscox Syndicates Ltd and Hiscox Insurance Company Ltd are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority. Hiscox Underwriting Limited, Hiscox Europe Underwriting Limited and Hiscox ASM Limited are authorised and regulated by the Financial Conduct Authority. Hiscox plc is a company registered in England and Wales under company registration number 2837811 and registered office at 1 Great St Helen's, London EC3A 6HX.

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@alaneliott.net.

From: Linda Lichter llichter@ligna.com
Subject: Re: 2700815 Amazing Grace
Date: September 4, 2015 at 8:40 AM
To: alan elliott (ucla) alanelliott@g.ucla.edu
Cc: Tom Luddy tom.luddy@gmail.com, Julie Huntsinger juliehuntsinger@me.com, Tom McGuire tmcguire@wmeentertainment.com, Todd W. Musburger todd@musburger.com

LL

Thanks

Linda Lichter

On Sep 4, 2015, at 9:29 AM, alan elliott (ucla) <alanelliott@g.ucla.edu> wrote:

I will send over a link to Aretha's contract re: below in a minute. meantime please see insurers' notes below.

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.

Begin forwarded message:

From: Stephen Carroll <stephen.carroll@aon.com>
Date: July 13, 2015 at 9:12:25 AM MDT
To: "alan elliott (ucla)" (alanelliott@g.ucla.edu) <alanelliott@g.ucla.edu>
Cc: Annette Shavuo <annette.shavuo@aon.com>
Subject: FW: 2700815 Amazing Grace

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,
Joann

Joanne Richardson, CPCU
Media & Entertainment Practice Leader
Hiscox Partner
Hiscox USA
T 646.452.2355
M 646.823.8092
joanne.richardson@hiscox.com
Connect with Hiscox online
Web 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)

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. No one else is authorised to distribute, forward, print, copy or act upon any information contained in this email. If you have received this email in error, please notify the sender.

Hiscox Syndicates Ltd and Hiscox Insurance Company Ltd are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority. Hiscox Underwriting Limited, Hiscox Europe Underwriting Limited and Hiscox ASM Limited are authorised and regulated by the Financial Conduct Authority. Hiscox plc is a company registered in England and Wales under company registration number 2837811 and registered office at 1 Great St Helen's, London EC3A 6HX.

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.

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Fwd: 2700815 Amazing Grace
Date: September 8, 2015 at 12:48 PM
To: Jack Tanner Jtanner@fwlaw.com



thank you.

phone: 323 988 9692

Sent from me.

Begin forwarded message:

From: Stephen Carroll <stephen.carroll@aon.com>
Date: July 13, 2015 at 8:12:25 AM PDT
To: "alan elliott (ucla)" (alanelliott@g.ucla.edu) <alanelliott@g.ucla.edu>
Cc: Annette Shavuo <annette.shavuo@aon.com>
Subject: FW: 2700815 Amazing Grace

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 aware of the contract attached and that the insured is relying on this contract/document to make this film. We have vetted it's 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 exclusion that apply regardless and we could never confirm or deny any coverage in advance as each and every claims sencerio 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 tile 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,
.Joann

cc: [redacted]

Joanne Richardson, CPCU
Media & Entertainment Practice Leader
Hiscox Partner
Hiscox USA
T 646.452.2355
M 646.823.8092
joanne.richardson@hiscox.com
Connect with Hiscox online
Web 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)

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. No one else is authorised to distribute, forward, print, copy or act upon any information contained in this email. If you have received this email in error, please notify the sender.

Hiscox Syndicates Ltd and Hiscox Insurance Company Ltd are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority. Hiscox Underwriting Limited, Hiscox Europe Underwriting Limited and Hiscox ASM Limited are authorised and regulated by the Financial Conduct Authority. Hiscox plc is a company registered in England and Wales under company registration number 2837811 and registered office at 1 Great St Helen's, London EC3A 6HX.



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

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.

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Fwd: 2700815 Amazing Grace
Date: March 2, 2016 at 1:08 PM
To: Shaun H. Crosner scrosner@linerlaw.com



thank you.

-alan

phone: 323 988 9692
peace and love.

<http://songsoundrecord.tumblr.com>

Begin forwarded message:

From: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Subject: Re: 2700815 Amazing Grace
Date: March 2, 2016 at 1:08:14 PM PST
To: Stephen Carroll <stephen.carroll@aon.com>

hi stephen:

i have a couple items i could use your help with please:

- 1) i will send you a note about previous coverage re: the chubb group. (it'll be the next email i send to you).
- 2) something i'd like to go back to hiscox on:

the warner seven arts contract which we asked hiscox to vet (see below).

the contract has an indemnification page (page two: [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)).

i would like, as was discussed, ask the insurer to go to atlantic records for reimbursement. the contract reads (page 2 of the aretha/warner seven arts personal service agreement):

"To Warner Bros.- Seven Arts, Inc..." (from whom i have quitclaim)

"...in consideration thereof and as an inducement for you so to do, 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.

- ATLANTIC RECORDING CORPORATION"

because the indemnification and contract are vetted and not excluded, i want hiscox to be put on notice and to start with the process of doing good on the claim.

thank you.

-alan

phone: 323 988 9692
peace and love.

<http://songsoundrecord.tumblr.com>

Begin forwarded message:

From: Stephen Carroll <stephen.carroll@aon.com>
Date: July 13, 2015 at 8:12:25 AM PDT
To: "alan elliott (ucla)" (alanelliott@g.ucla.edu) <alanelliott@g.ucla.edu>
Cc: Annette Shavuo <annette.shavuo@aon.com>
Subject: FW: 2700815 Amazing Grace

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,
Joann

Joanne Richardson, CPCU
Media & Entertainment Practice Leader
Hiscox Partner
Hiscox USA

HISCOX USA

T 646.452.2355

M 646.823.8092

joanne.richardson@hiscox.com

Connect with Hiscox online

Web www.hiscoxbroker.com

Twitter [@Hiscox_USA](https://twitter.com/Hiscox_USA)

<image003.png>

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)

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. No one else is authorised to distribute, forward, print, copy or act upon any information contained in this email. If you have received this email in error, please notify the sender.

Hiscox Syndicates Ltd and Hiscox Insurance Company Ltd are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority. Hiscox Underwriting Limited, Hiscox Europe Underwriting Limited and Hiscox ASM Limited are authorised and regulated by the Financial Conduct Authority. Hiscox plc is a company registered in England and Wales under company registration number 2837811 and registered office at 1 Great St Helen's, London EC3A 6HX.

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

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.

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Fwd: 2700815 Amazing Grace
Date: March 14, 2016 at 2:41 PM
To: Stephen Carroll stephen.carroll@aon.com



hey stephen

has hiscox taken a position re point #2 (below)?

thank you.

-alan

phone: [323 988 9692](tel:3239889692)
peace and love.

Begin forwarded message:

From: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Date: March 2, 2016 at 1:08:14 PM PST
To: Stephen Carroll <stephen.carroll@aon.com>
Subject: Re: 2700815 Amazing Grace

hi stephen:

i have a couple items i could use your help with please:

- 1) i will send you a note about previous coverage re: the chubb group. (it'll be the next email i send to you).
- 2) something i'd like to go back to hiscox on:

the warner seven arts contract which we asked hiscox to vet (see below).

the contract has an indemnification page (page two: [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)).

i would like, as was discussed, ask the insurer to go to atlantic records for reimbursement. the contract reads (page 2 of the aretha/warner seven arts personal service agreement):

"To Warner Bros.- Seven Arts, Inc..." (from whom i have quitclaim)

"...in consideration thereof and as an inducement for you so to do, 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.

- ATLANTIC RECORDING CORPORATION"

because the indemnification and contract are vetted and not excluded, i want hiscox to be put on notice and to start with the process of doing good on the claim.

thank you.

-alan

phone: 323 988 9692
peace and love.

<http://songsoundrecord.tumblr.com>

Begin forwarded message:

From: Stephen Carroll <stephen.carroll@aon.com>
Date: July 13, 2015 at 8:12:25 AM PDT
To: "alan elliott (ucla)" (alanelliott@g.ucla.edu) <alanelliott@g.ucla.edu>
Cc: Annette Shavuo <annette.shavuo@aon.com>
Subject: FW: 2700815 Amazing Grace

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 claim 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
Connect with Hiscox online
Web www.hiscoxbroker.com
Twitter [@Hiscox_USA](https://twitter.com/Hiscox_USA)

<image003.png>

From: Stephen Carroll [<mailto:stephen.carroll@aon.com>]
Sent: Thursday, July 09, 2015 3:11 PM

Sent: Thursday, July 09, 2015 2:37 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)

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. No one else is authorised to distribute, forward, print, copy or act upon any information contained in this email. If you have received this email in error, please notify the sender.

Hiscox Syndicates Ltd and Hiscox Insurance Company Ltd are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority. Hiscox Underwriting Limited, Hiscox Europe Underwriting Limited and Hiscox ASM Limited are authorised and regulated by the Financial Conduct Authority. Hiscox plc is a company registered in England and Wales under company registration number 2837811 and registered office at 1 Great St Helen's, London EC3A 6HX.

<4-1-1968 Aretha Franklin Recording Agreement (Atlantic and Warner Bros. Seven Arts).pdf>

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.

From: Todd Musburger todd@musburger.com
Subject: Re: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post
Date: July 25, 2015 at 3:44 PM
To: alan elliott alanelliott@g.ucla.edu, alan elliott Alan@AlanElliott.net

Please do not respond to him

IPhone Transmission Please excuse Typos & Peculiar abbreviations

On Jul 25, 2015, at 5:35 PM, Hope, Ted <ted.hope@amazonstudios.com> wrote:

JUST to be clear and so there is no confusion, this is not what we, Amazon, will be presenting when we speak to Aretha's attorney next week. We will be offering \$450K (\$250K additional from Amazon, and \$200K reduced from the advance we were offering Alan. Additionally we will make clear our interest in developing a bio-pic on Aretha and would be willing to provide an additional life rights option as well as the necessary development funds. But this will be a take it or leave it offer and will have to move on if a deal can not be made and we can not get Aretha to sign.

Ted

From: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Date: Wednesday, July 22, 2015 at 2:34 PM
To: "Hope, Ted" <ted.hope@amazonstudios.com>
Subject: Fwd: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post

thank you.

-alan

phone: 323 988 9692

This email 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.

Begin forwarded message:

From: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Subject: Re: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post
Date: July 22, 2015 at 1:48:52 PM PDT
To: Liesl Copland <LCopland@wmeentertainment.com>
Cc: "Todd W. Musburger" <todd@musburger.com>, Tom McGuire <TMcGuire@wmeentertainment.com>

below is a proposal i have talked with ted about presenting AFTER amazon gets in. aretha is going to ask for \$1m up front... and that's gonna end things (icm is not gonna help here).

Executives at Warner Music Group anticipate that Ms. Franklin's participation in the scheduled events will increase catalog sales between \$2m-3m for the forthcoming year alone. The

[amazing grace plan 2015/2016:](#)

August

first- to finish the film with Ms. Franklin

- open the movie with an original song.
- her doing a 2-3 min. opening of film
- a "commentary" for dvd

(\$250k)

(Total: \$250k)

we would work out a schedule of "appearance fees" (e.g. :

We would work out a schedule of appearance fees (e.g.:

- press tour (possible interviews):

- * "the view"
- * "ellen"
- * "wendy williams"
- * "steve harvey"
- * "the today show"
- * "60 mins."
- * "gma"
- * "katie"
- * "kelly and mike"
- * "the talk"
- * "cbs this morning"
- * newspapers, various others

(\$100k)

(Total: \$350k)

- telluride
- Toronto
- nyff

- taping of "oprah's next chapter"

+ **ARETHA would be interviewed by oprah.**

(\$50k)

(Total: \$400k)

small pre-film release shows... (whereby she appears for 3 songs with choir, band)

- hollywood bowl
- apollo

(\$100k)

(Total: \$500k)

October:

- taping of "amazing grace" special at the kennedy center- president obama to presidential medal of freedom (for the second time! only a few people have ever gotten multiple awards).

- * a network special featuring:
 - + performances from the live tour
 - + guest stars performing songs from the original "amazing grace" album
 - + taped interviews discussing aretha, the history of the project, and the songs/music
- + **ARETHA would be performing and of course, be the honoree.**
- * the president and first lady have said they would attend

(\$100k)

(total: \$600k)

November-December:

- "oprah's next chapter" special to air

- "[amazing_grace](#)" **network special** to air
- "amazing grace" live:
- **limited theatrical run for qualifying for awards season**

2016

january:

- "live tour" preview at [stellar awards](#), january 18, 2016.
- * we would have a performance of the live tour presentation featuring the choir, the band, the projection of the movie and **ARETHA would be performing.**

(\$50k)
(total: \$650k)

- "live tour" preview at [grammy awards](#), february, 2016.
- * we would have a performance of the live tour presentation featuring the choir, the band, the projection of the movie and **ARETHA would be performing.**

(\$50k)
(total: \$700k)

February:

Ken Ehrlich post-grammy special:

(\$200k)
(total: \$900k)

June- September:

- "[amazing_grace live](#)" tour/US
- outdoor arenas, late spring, summer 2016 (hollywood bowl, saratoga, etc,)
- **ARETHA sing three songs with choir..**

(\$400k @ \$50k*8 dates)
(total: \$1.3m)

September- October:

- "[amazing_grace live](#)" tour/europe
 - harvey goldsmith wants to present the tour in europe (<http://www.harveygoldsmith.com/about/>)
- **ARETHA would do a filmed intro.**
- **bbc special**
- a history of modern gospel leading to "amazing grace"
- * co-produced with arena/bbc
- * will build momentum/word of mouth for european tour
- * **ARETHA would do an interview.**

(\$400k @ \$50k*8 dates)

(total: \$1.7m)

thank you.

-alan

phone: 323 988 9692

This email 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.

On Jul 22, 2015, at 1:12 PM, Liesl Copland <LCopland@wmeentertainment.com> wrote:

Amazon called me to say hold on a call and talked with me about a favor ICM owes us they want to call in here. I said we have to understand the playing field a bit more with regards to them a) having the rights then b) going to get stuff done and he understood and started asking questions along the lines of "if Aretha needs a bigger check..." will we pitch in. I said we can't do this that way and he asked to think about his economics and come back to us.

Liesl Copland | WME

LCopland@wmeentertainment.com

310.246.3383

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

Sent: Wednesday, July 22, 2015 1:04 PM

To: harmoni@amazon.com

Cc: Todd Musburger; Ted Hope; Liesl Copland; Tom McGuire; jkramer@amazon.com

Subject: Fwd: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post

hi harmoni and everone-

as promised... and now delivered... the insurance, no exclusions.

thank you.

-alan

phone: 323 988 9692

This email 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.

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Subject: FW: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post
Date: July 22, 2015 at 12:32:48 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Cc: Stephen Carroll <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.

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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Re: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post
Date: July 25, 2015 at 5:41 PM
To: Todd Musburger todd@musburger.com



ps

the offer they have, which is fine, does NOT have a 50-50...

or foreign or anything else...

which we will not address... in case by some miracle it works...

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.

On Jul 25, 2015, at 3:44 PM, Todd Musburger <todd@musburger.com> wrote:

Please do not respond to him

IPhone Transmission Please excuse Typos & Peculiar abbreviations

On Jul 25, 2015, at 5:35 PM, Hope, Ted <ted.hope@amazonstudios.com> wrote:

JUST to be clear and so there is no confusion, this is not what we, Amazon, will be presenting when we speak to Aretha's attorney next week. We will be offering \$450K (\$250K additional from Amazon, and \$200K reduced from the advance we were offering Alan. Additionally we will make clear our interest in developing a bio-pic on Aretha and would be willing to provide an additional life rights option as well as the necessary development funds. But this will be a take it or leave it offer and will have to move on if a deal can not be made and we can not get Aretha to sign.

Ted

From: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Date: Wednesday, July 22, 2015 at 2:34 PM
To: "Hope, Ted" <ted.hope@amazonstudios.com>
Subject: Fwd: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post

thank you.

-alan

phone: 323 988 9692

This email 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.

Begin forwarded message:

From: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Subject: Re: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post
Date: July 22, 2015 at 1:48:52 PM PDT
To: Liesl Copland <LCopland@wmeentertainment.com>
Cc: "Todd W. Musburger" <todd@musburger.com>, Tom McGuire <TMcGuire@wmeentertainment.com>

below is a proposal i have talked with ted about presenting AFTER amazon gets in. aretha is going to ask for \$1m up front... and that's gonna end things (icm is not gonna help here).

Executives at Warner Music Group anticipate that Ms. Franklin's participation in the scheduled events will increase catalog sales between \$2m-3m for the forthcoming year alone. The

amazing grace plan 2015/2016:

August

first- to finish the film with Ms. Franklin

- open the movie with an original song.
- her doing a 2-3 min. opening of film
- a "commentary" for dvd

(\$250k)

(Total: \$250k)

we would work out a schedule of "appearance fees" (e.g.:

- press tour (possible interviews):

- * "the view"
- * "ellen"
- * "wendy williams"
- * "steve harvey"
- * "the today show"
- * "60 mins."
- * "gma"
- * "katie"
- * "kelly and mike"
- * "the talk"
- * "cbs this morning"
- * newspapers, various others

(\$100k)

(Total: \$350k)

- telluride
- Toronto
- nyff

- taping of "oprah's next chapter"

+ **ARETHA would be interviews by oprah.**

(\$50k)

(Total: \$400k)

small pre-film release shows... (whereby she appears for 3 songs with choir, band)

- hollywood bowl
- apollo

(\$100k)

(Total: \$500k)

October:

- taping of "amazing grace" special at the kennedy center- president obama to presidential medal of freedom (for the second time! only a few people have ever gotten multiple awards).

* a network special featuring:

+ performances from the live tour

+ guest stars performing songs from the original "amazing grace" album

+ taped interviews discussing aretha, the history of the project, and the songs/music

+ **ARETHA would be performing and of course, be the honoree.**

* the president and first lady have said they would attend

(\$100k)

(total: \$600k)

November-December:

- "oprah's next chapter" special to air

- "amazing grace" network special to air

- "amazing grace" live:

- limited theatrical run for qualifying for awards season

2016

january:

- "live tour" preview at stellar awards, january 18, 2016.

* we would have a performance of the live tour presentation featuring the choir, the band, the projection of the movie and **ARETHA would be performing.**

(\$50k)

(total: \$650k)

- "live tour" preview at grammy awards, february, 2016.

* we would have a performance of the live tour presentation featuring the choir, the band, the projection of the movie and **ARETHA would be performing.**

(\$50k)

(total: \$700k)

February:

Ken Ehrlich post-grammy special:

(\$200k)

(total: \$900k)

June- September:

- "amazing grace live" tour/US

- outdoor arenas, late spring, summer 2016 (hollywood bowl, saratoga, etc,)

- **ARETHA sing three songs with choir..**

(\$400k @ \$50k*8 dates)

(total: \$1.3m)

September- October:

- "amazing_grace live" tour/europe
 - harvey goldsmith wants to present the tour in europe (<http://www.harveygoldsmith.com/about/>)
- ARETHA would do a filmed intro.
- **bbc special**
- a history of modern gospel leading to "amazing grace"
- * co-produced with arena/bbc
- * will build momentum/word of mouth for european tour
- * ARETHA would do an interview.

(\$400k @ \$50k*8 dates)

(total: \$1.7m)

thank you.

-alan

phone: 323 988 9692

This email 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.

On Jul 22, 2015, at 1:12 PM, Liesl Copland <LCopland@wmeentertainment.com> wrote:

Amazon called me to say hold on a call and talked with me about a favor ICM owes us they want to call in here. I said we have to understand the playing field a bit more with regards to them a) having the rights then b) going to get stuff done and he understood and started asking questions along the lines of "if Aretha needs a bigger check..." will we pitch in. I said we can't do this that way and he asked to think about his economics and come back to us.

Liesl Copland | WME

LCopland@wmeentertainment.com

310.246.3383

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

Sent: Wednesday, July 22, 2015 1:04 PM

To: harmoni@amazon.com

Cc: Todd Musburger; Ted Hope; Liesl Copland; Tom McGuire; jkramer@amazon.com

Subject: Fwd: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post

hi harmoni and everone-

as promised... and now delivered... the insurance, no exclusions.

thank you.

-alan

phone: 323 988 9692

This email 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.

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>

Subject: FW: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post

Date: July 22, 2015 at 12:32:48 PM PDT

To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>

Cc: Stephen Carroll <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.

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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

From: Liesl Copland LCopland@wmeentertainment.com
Subject: Fwd: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post
Date: July 25, 2015 at 7:35 PM
To: Todd W. Musburger todd@musburger.com
Cc: alan elliott (ucla) alanelliott@g.ucla.edu

LC

Todd did you connect with lawyers Fri! This has to be between lawyers right now...

Sent from my iPhone

Liesl Copland | WME

LCopland@wmeentertainment.com

310.246.3383

Begin forwarded message:

From: "Hope, Ted" <ted.hope@amazonstudios.com>
Date: July 25, 2015 at 3:35:59 PM PDT
To: "alan elliott (ucla)" <alanelliott@g.ucla.edu>, Liesl Copland <LCopland@wmeentertainment.com>, Todd Musburger <todd@musburger.com>
Cc: Avy Eschenasy <avy@eschenasy.com>, "Kramer, Josh" <jkramer@amazon.com>
Subject: Re: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post

JUST to be clear and so there is no confusion, this is not what we, Amazon, will be presenting when we speak to Aretha's attorney next week. We will be offering \$450K (\$250K additional from Amazon, and \$200K reduced from the advance we were offering Alan. Additionally we will make clear our interest in developing a bio-pic on Aretha and would be willing to provide an additional life rights option as well as the necessary development funds. But this will be a take it or leave it offer and will have to move on if a deal can not be made and we can not get Aretha to sign.

Ted

From: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Date: Wednesday, July 22, 2015 at 2:34 PM
To: "Hope, Ted" <ted.hope@amazonstudios.com>
Subject: Fwd: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post

thank you.

-alan

phone: 323 988 9692

This email 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.

Begin forwarded message:

From: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Subject: Re: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post
Date: July 22, 2015 at 1:48:52 PM PDT
To: Liesl Copland <LCopland@wmeentertainment.com>
Cc: "Todd W. Musburger" <todd@musburger.com>, Tom McGuire <TMcGuire@wmeentertainment.com>

below is a proposal i have talked with ted about presenting AFTER amazon gets in. aretha is going to ask for \$1m up front... and that's gonna end things (icm is not gonna help here).

Executives at Warner Music Group anticipate that Ms. Franklin's participation in the scheduled events will increase catalog sales between \$2m-3m for the forthcoming year alone. The

[amazing grace plan 2015/2016:](#)

August

first- to finish the film with Ms. Franklin

- open the movie with an original song.
- her doing a 2-3 min. opening of film
- a "commentary" for dvd

(\$250k)

(Total: \$250k)

we would work out a schedule of "appearance fees" (e.g.:

- press tour (possible interviews):

- * "the view"
- * "ellen"
- * "wendy williams"
- * "steve harvey"
- * "the today show"
- * "60 mins."
- * "gma"
- * "katie"
- * "kelly and mike"
- * "the talk"
- * "cbs this morning"
- * newspapers, various others

(\$100k)

(Total: \$350k)

- telluride
- Toronto
- nyff

- taping of "oprah's next chapter"

+ **ARETHA would be interviews by oprah.**

(\$50k)

(Total: \$400k)

small pre-film release shows... (whereby she appears for 3 songs with choir, band)

- hollywood bowl
- apollo

(\$100k)

(Total: \$500k)

October:

- taping of "**amazing grace**" special at the kennedy center- president obama to presidential medal of freedom (for the second time! only a few people have ever gotten multiple awards)

* a network special featuring:

+ performances from the live tour

- performances from the live tour
- + guest stars performing songs from the original "amazing grace" album
- + taped interviews discussing aretha, the history of the project, and the songs/music
- + **ARETHA would be performing and of course, be the honoree.**
- * the president and first lady have said they would attend

(\$100k)
(total: \$600k)

November-December:

- "oprah's next chapter" special to air
- "amazing grace" network special to air
- "amazing grace" live:
- limited theatrical run for qualifying for awards season

2016

january:

- "live tour" preview at stellar awards, january 18, 2016.
- * we would have a performance of the live tour presentation featuring the choir, the band, the projection of the movie and **ARETHA would be performing.**

(\$50k)
(total: \$650k)

- "live tour" preview at grammy awards, february, 2016.
- * we would have a performance of the live tour presentation featuring the choir, the band, the projection of the movie and **ARETHA would be performing.**

(\$50k)
(total: \$700k)

February:

Ken Ehrlich post-grammy special:

(\$200k)
(total: \$900k)

June- September:

- "amazing grace live" tour/US
- outdoor arenas, late spring, summer 2016 (hollywood bowl, saratoga, etc,)
- **ARETHA sing three songs with choir..**

(\$400k @ \$50k*8 dates)
(total: \$1.3m)

September- October:

- "amazing_grace_live" tour/europe
 - harvey goldsmith wants to present the tour in europe (<http://www.harveygoldsmith.com/about/>)
- ARETHA would do a filmed intro.
- **bbc special**
- a history of modern gospel leading to "amazing grace"
- * co-produced with arena/bbc
- * will build momentum/word of mouth for european tour
- * ARETHA would do an interview.

(\$400k @ \$50k*8 dates)

(total: \$1.7m)

thank you.

-alan

phone: 323 988 9692

This email 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.

On Jul 22, 2015, at 1:12 PM, Liesl Copland <LCopland@wmeentertainment.com> wrote:

Amazon called me to say hold on a call and talked with me about a favor ICM owes us they want to call in here. I said we have to understand the playing field a bit more with regards to them a) having the rights then b) going to get stuff done and he understood and started asking questions along the lines of "if Aretha needs a bigger check..." will we pitch in. I said we can't do this that way and he asked to think about his economics and come back to us.

Liesl Copland | WME

LCopland@wmeentertainment.com

310.246.3383

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

Sent: Wednesday, July 22, 2015 1:04 PM

To: harmoni@amazon.com

Cc: Todd Musburger; Ted Hope; Liesl Copland; Tom McGuire; jkramer@amazon.com

Subject: Fwd: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post

hi harmoni and everone-

as promised... and now delivered... the insurance, no exclusions.

thank you.

-alan

phone: 323 988 9692

This email 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.

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>

Subject: FW: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post

Date: July 22, 2015 at 12:32:48 PM PDT

To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>

Cc: Stephen Carroll <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.

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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Fwd: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post
Date: July 28, 2015 at 6:34 PM
To: Todd W. Musburger todd@musburger.com



insurance... needs signature tomorrow...

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.

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Date: July 22, 2015 at 12:32:48 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Cc: Stephen Carroll <stephen.carroll@aon.com>
Subject: FW: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post

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

Before you print, think about the ENVIRONMENT 🌱

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.



Binder - EO -
15-18...ce.pdf

[Downloading...](#)



App- REVISED
Q#22 -...03.doc

[214 KB](#)

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Re: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post
Date: July 29, 2015 at 1:37 PM
To: Annette Shavuo annette.shavuo@aon.com
Cc: Stephen Carroll stephen.carroll@aon.com, Todd W. Musburger todd@musburger.com



hello annette

attached is the signed copy and application. still outstanding is:

- the corbis stock shot
- publishing rights (i should have in next two weeks)

thank you.

-alan



amazing grace
App- R...03.doc



State National Insurance Company, Inc.
Administered by Hiscox Inc.

Video, film and television producers application

NOTICE TO NEW MEXICO RESIDENT APPLICANTS: Any person who knowingly presents false information in an application for insurance is guilty of a crime and may be subject to civil fines and criminal penalties.

NOTICE TO NEW YORK RESIDENT APPLICANTS: Any persons who knowingly and with the intent to defraud any insurance company or other person files an application for insurance or statement of claim containing any materially false information or conceals for purpose of misleading, information concerning any fact material thereto, commits a fraudulent insurance act, which is a crime and also be subject to a civil penalty not to exceed five thousand dollars and the stated value of the claim for each such violation.

NOTICE TO OHIO RESIDENT APPLICANTS: Any person who, with the intent to defraud or knowing that he is facilitating a fraud on an insurer, submits an application or files a claim containing a false or deceptive statement is guilty of insurance fraud.

NOTICE TO OKLAHOMA RESIDENT APPLICANTS: WARNING: Any person who knowingly and with the intent to injure, defraud or deceive any insurer, makes any claim for the proceeds of an insurance policy containing any false, incomplete or misleading information is guilty of a felony.

NOTICE TO PENNSYLVANIA RESIDENT APPLICANTS: Any person who knowingly and with the intent to defraud any insurance company or other person files an application for insurance or statement of claim containing any materially false information or conceals for the purpose of misleading, information concerning any fact thereto commits a fraudulent insurance act, which is a crime and subjects such a person to criminal and civil penalties.

NOTICE TO UTAH RESIDENT APPLICANTS: For your protection, Utah law requires the following to be included in this application: Any person who knowingly presents false or fraudulent underwriting information, files or causes to be filed a false or fraudulent claim for disability compensation or medical benefits, or submits a false or fraudulent report or billing for health care fees or other professional services is guilty of a crime and may be subject to fines and confinement in state prison.

NOTICE TO VIRGINIA RESIDENT APPLICANTS: It is a crime to knowingly provide false, incomplete or misleading information to an insurance company for the purpose of defrauding the company. Penalties include imprisonment, fines and denial of insurance benefits.

NOTICE TO WASHINGTON RESIDENT APPLICANTS: It is a crime to knowingly provide false, incomplete, or misleading information to an insurance company for the purposes of defrauding the company. Penalties include imprisonment, fines and denial of insurance benefits.

NOTICE TO WEST VIRGINIA RESIDENT APPLICANTS: Any person who knowingly presents a false or fraudulent claim for payment of a loss or benefit or knowingly presents false information in an application for insurance is guilty of a crime and may be subject to fines and confinement in prison.

Signature	6.22.15
	Date (mm/dd/yyyy)
PRODUCER	
Title	
Agent's License Number:	
Agent's Name:	
A copy of this application should be retained for your records.	
US PRO APP 01.1 (A) (ed. 10/07)	
6 of	

phone: 323 988 9692

This email 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.

On Jul 22, 2015, at 12:32 PM, Annette Shavuo <annette.shavuo@aon.com> wrote:

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

Before you print, think about the ENVIRONMENT 🌱

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

<Binder - EO - 15-18 Amazing Grace.pdf><App- REVISED Q#22 -E&O Video Film and Television Producers Application Admitted_Word1203.doc>

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Fwd: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post
Date: August 20, 2015 at 5:41 PM
To: Tom Garvin tom@garvin-law.com



thank you.

-alan

phone: 323 988 9692

This email 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.

Begin forwarded message:

From: "Cruz, Harmoni" <harmoni@amazon.com>
Subject: RE: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post
Date: July 22, 2015 at 1:20:57 PM PDT
To: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Cc: Todd Musburger <todd@musburger.com>, "Hope, Ted" <ted.hope@amazonstudios.com>, Liesl Copland <LCopland@wmeentertainment.com>, Tom McGuire <tmcguire@wmeentertainment.com>, "Kramer, Josh" <jkramer@amazon.com>, "Heintz, Matthew" <heintz@amazon.com>, "Patel, Ajay" <ajayp@amazon.com>

Thanks, Alan. I'm looping in Matthew and Ajay from our Amazon legal team as well.

In one of the previous docs, we noted a reference to a legal opinion letter re chain of title for the film. Do you or your agent/broker have this on hand? We'd like to see a copy of the letter to assist with our review.

Thanks,
Harmoni

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Wednesday, July 22, 2015 1:04 PM
To: Cruz, Harmoni
Cc: Todd Musburger; Hope, Ted; Liesl Copland; Tom McGuire; Kramer, Josh
Subject: Fwd: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post

hi harmoni and everone-

as promised... and now delivered... the insurance, no exclusions.

thank you.

-alan

phone: 323 988 9692

This email 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

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.

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Subject: FW: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post
Date: July 22, 2015 at 12:32:48 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Cc: Stephen Carroll <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.

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

Before you print, think about the ENVIRONMENT 🌱

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.



Binder - EO -
15-18...ce.pdf

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Fwd: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post
Date: August 20, 2015 at 7:58 PM
To: Matt Farmer mifarmer0@gmail.com



thank you.

-alan

phone: 323 988 9692

This email 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.

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Subject: FW: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post
Date: July 22, 2015 at 12:32:48 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Cc: Stephen Carroll <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

177 Madison Avenue, Suite 1611
New York, NY 10016
Tel: (212) 627-7400 / Direct: (212) 463-5586
Fax: (212) 633-1457 / Direct: (847) 953-0849

Before you print, think about the ENVIRONMENT 🌱

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.



Binder - EO -
15-18...ce.pdf



App- REVISED
Q#22 -...03.doc

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Fwd: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post
Date: August 27, 2015 at 12:37 PM
To: Todd W. Musburger todd@musburger.com



thank you.

-alan

phone: 323 988 9692

This email 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.

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Subject: FW: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post
Date: July 22, 2015 at 12:32:48 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Cc: Stephen Carroll <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

177 Madison Avenue, Suite 1611
New York, NY 10016
Tel: (212) 627-7400 / Direct: (212) 463-5586
Fax: (212) 633-1457 / Direct: (847) 953-0849

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.



Binder - EO -
15-18...ce.pdf
[154 KB](#)



App- REVISED
Q#22 -...03.doc
[214 KB](#)

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Fwd: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post
Date: September 8, 2015 at 12:51 PM
To: Jack Tanner jtanner@fwlaw.com



thank you.

phone: 323 988 9692

Sent from me.

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Date: July 22, 2015 at 12:32:48 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Cc: Stephen Carroll <stephen.carroll@aon.com>
Subject: FW: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post

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

Before you print, think about the ENVIRONMENT 🌳

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.



Binder - EO -
15-18...ce.pdf



App- REVISED
Q#22 - ...03.doc

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Fwd: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post
Date: September 8, 2015 at 1:25 PM
To: Bodden Tara Tara.Bodden@HISCOX.com



thank you.

phone: 323 988 9692

Sent from me.

Begin forwarded message:

From: Jack Tanner <Jtanner@fwlaw.com>
Date: September 8, 2015 at 1:21:40 PM PDT
To: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Subject: RE: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post

Alan,

Wiring instructions are as follows:

Wells Fargo Bank West, N.A.
420 Montgomery Street
San Francisco, CA 94104
ABA #121 000 248

Fairfield and Woods, P.C.
COLTAF Trust Account
Account #101 084 1812

Please reference your account number 12432.001.

Also, I already talked to one of my partners who does insurance coverage work. He said it would be helpful if you could send the contract with the Telluride Film Festival.

Thank you.

Jack
303.894.4495

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Tuesday, September 08, 2015 1:52 PM
To: Jack Tanner
Subject: Fwd: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post

thank you.

phone: 323 988 9692

Sent from me.

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Date: July 22, 2015 at 12:32:48 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Cc: Stephen Carroll <stephen.carroll@aon.com>
Subject: FW: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post

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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Fwd: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post
Date: July 22, 2015 at 12:48 PM
To: Todd Musburger todd@musburger.com



thank you.

-alan

phone: 323 988 9692

This email 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.

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Subject: FW: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post
Date: July 22, 2015 at 12:32:48 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Cc: Stephen Carroll <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

177 Madison Avenue, Suite 1611
New York, NY 10016
Tel: (212) 627-7400 / Direct: (212) 463-5586
Fax: (212) 633-1457 / Direct: (847) 953-0849

Before you print, think about the ENVIRONMENT 🌱

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.



Binder - EO -
15-18...ce.pdf



App- REVISED
Q#22 -...03.doc

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Fwd: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post
Date: February 9, 2016 at 5:26 PM
To: Anjani Mandavia amandavia@mandaviallp.com



thank you.

-alan

phone: 323 988 9692
peace and love.

<http://songsoundrecord.tumblr.com>

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Subject: FW: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post
Date: July 22, 2015 at 12:32:48 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Cc: Stephen Carroll <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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.



Binder - EO -
15-18...ce.pdf

[Downloading...](#)



App- REVISED
Q#22 -...03.doc

[214 KB](#)

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Fwd: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post
Date: February 23, 2016 at 5:02 PM
To: Shaun H. Crosner scrosner@linerlaw.com



Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Subject: FW: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post
Date: July 22, 2015 at 12:32:48 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Cc: Stephen Carroll <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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended

using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.



Binder - EO -
15-18...ce.pdf
[Downloading...](#)



App- REVISED
Q#22 -...03.doc
[214 KB](#)

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Fwd: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post
Date: May 4, 2017 at 11:24 AM
To: Lew Loss lloss@ljwllp.com, Charles Chotvacs cchotvacs@ljwllp.com



thank you.

-alan

phone: 323 988 9692

peace and love.

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Subject: FW: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post
Date: July 22, 2015 at 12:32:48 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Cc: Stephen Carroll <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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.



Binder - EO -
15-18...ce.pdf



App- REVISED
Q#22 -...03.doc

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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

<Binder - EO - 15-18 Amazing Grace.pdf><App- REVISED Q#22 -E&O Video Film and Television Producers Application Admitted_Word1203.doc>

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Fwd: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post
Date: July 18, 2017 at 5:20 PM
To: Chad Milton cemilton@mediariskconsultants.com



thank you.

-alan

phone: 323 988 9692

peace and love.

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Subject: FW: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post
Date: July 22, 2015 at 12:32:48 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Cc: Stephen Carroll <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

Before you print, think about the ENVIRONMENT 🌱

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.



Binder - EO -
15-18...ce.pdf



App- REVISED
Q#22 -...03.doc

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Fwd: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post
Date: September 8, 2017 at 2:38 PM
To: Nelson Hsieh nhsieh@gpsllp.com



thank you.

-alan

phone: 323 988 9692

peace and love.

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Subject: FW: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post
Date: July 22, 2015 at 12:32:48 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Cc: Stephen Carroll <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

Before you print, think about the ENVIRONMENT 🌱

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.



Binder - EO -
15-18...ce.pdf



App- REVISED
Q#22 -...03.doc

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Fwd: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post
Date: July 22, 2015 at 1:04 PM
To: harmoni@amazon.com
Cc: Todd Musburger todd@musburger.com, Ted Hope ted.hope@amazonstudios.com, Liesl Copland LCopland@wmeentertainment.com, Tom McGuire tmcguire@wmeentertainment.com, jkramer@amazon.com



hi harmoni and everone-

as promised... and now delivered... the insurance, no exclusions.

thank you.

-alan

phone: 323 988 9692

This email 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.

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Subject: FW: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post
Date: July 22, 2015 at 12:32:48 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Cc: Stephen Carroll <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.

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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.



Binder - EO -

From: Liesl Copland LCopland@wmeentertainment.com
Subject: RE: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post
Date: July 22, 2015 at 1:12 PM
To: alan elliott (ucla) alanelliott@g.ucla.edu
Cc: Todd Musburger todd@musburger.com, Tom McGuire TMcGuire@wmeentertainment.com



Amazon called me to say hold on a call and talked with me about a favor ICM owes us they want to call in here. I said we have to understand the playing field a bit more with regards to them a) having the rights then b) going to get stuff done and he understood and started asking questions along the lines of "if Aretha needs a bigger check..." will we pitch in. I said we can't do this that way and he asked to think about his economics and come back to us.

Liesl Copland | WME
LCopland@wmeentertainment.com
310.246.3383

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Wednesday, July 22, 2015 1:04 PM
To: harmoni@amazon.com
Cc: Todd Musburger; Ted Hope; Liesl Copland; Tom McGuire; jkramer@amazon.com
Subject: Fwd: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post

hi harmoni and everone-

as promised... and now delivered... the insurance, no exclusions.

thank you.

-alan

phone: 323 988 9692

This email 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.

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Subject: FW: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post
Date: July 22, 2015 at 12:32:48 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Cc: Stephen Carroll <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.

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

Before you print, think about the ENVIRONMENT 🌱

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Fwd: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post
Date: July 22, 2015 at 1:32 PM
To: Tom McGuire tmcguire@wmeentertainment.com, Todd W. Musburger todd@musburger.com, Liesl Copland LCopland@wmeentertainment.com



you want me to not answer this, right?

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.

Begin forwarded message:

From: "Cruz, Harmoni" <harmoni@amazon.com>
Date: July 22, 2015 at 1:20:57 PM PDT
To: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Cc: Todd Musburger <todd@musburger.com>, "Hope, Ted" <ted.hope@amazonstudios.com>, Liesl Copland <LCopland@wmeentertainment.com>, Tom McGuire <tmcguire@wmeentertainment.com>, "Kramer, Josh" <jkramer@amazon.com>, "Heintz, Matthew" <heintz@amazon.com>, "Patel, Ajay" <ajayp@amazon.com>
Subject: RE: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post

Thanks, Alan. I'm looping in Matthew and Ajay from our Amazon legal team as well.

In one of the previous docs, we noted a reference to a legal opinion letter re chain of title for the film. Do you or your agent/broker have this on hand? We'd like to see a copy of the letter to assist with our review.

Thanks,
Harmoni

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Wednesday, July 22, 2015 1:04 PM
To: Cruz, Harmoni
Cc: Todd Musburger; Hope, Ted; Liesl Copland; Tom McGuire; Kramer, Josh
Subject: Fwd: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post

hi harmoni and everone-

as promised... and now delivered... the insurance, no exclusions.

thank you.

-alan

phone: 323 988 9692

This email 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.

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Subject: FW: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post
Date: July 22, 2015 at 12:32:48 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Cc: Stephen Carroll <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.

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

Before you print, think about the ENVIRONMENT 🌱

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.



Binder - EO -
15-18...ce.pdf

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Re: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post
Date: July 22, 2015 at 1:48 PM
To: Liesl Copland LCopland@wmeentertainment.com
Cc: Todd W. Musburger todd@musburger.com, Tom McGuire TMcGuire@wmeentertainment.com



below is a proposal i have talked with ted about presenting AFTER amazon gets in. aretha is going to ask for \$1m up front... and that's gonna end things (icm is not gonna help here).

Executives at Warner Music Group anticipate that Ms. Franklin's participation in the scheduled events will increase catalog sales between \$2m-3m for the forthcoming year alone. The

amazing grace plan 2015/2016:

August

first- to finish the film with Ms. Franklin

- open the movie with an original song.
- her doing a 2-3 min. opening of film
- a "commentary" for dvd

(\$250k)

(Total: \$250k)

we would work out a schedule of "appearance fees" (e.g.:

- press tour (possible interviews):

- * "the view"
- * "ellen"
- * "wendy williams"
- * "steve harvey"
- * "the today show"
- * "60 mins."
- * "gma"
- * "katie"
- * "kelly and mike"
- * "the talk"
- * "cbs this morning"
- * newspapers, various others

(\$100k)

(Total: \$350k)

- telluride
- Toronto
- nyff

- taping of "**oprah's next chapter**"

+ **ARETHA would be interviews by oprah.**

(\$50k)

(Total: \$400k)

small pre-film release shows... (whereby she appears for 3 songs with choir, band)

- hollywood bowl
- apollo

(\$100k)

(Total: \$500k)

October:

- taping of "**amazing grace**" special at the kennedy center- **president obama to presidential medal of freedom (for the second time! only a few people have ever gotten multiple awards)**

* a network special featuring:

+ performances from the live tour

+ guest stars performing songs from the original "amazing grace" album

+ taped interviews discussing aretha, the history of the project, and the songs/music

+ **ARETHA would be performing and of course, be the honoree.**

* the president and first lady have said they would attend

(\$100k)

(total: \$600k)

November-December:

- "**oprah's next chapter**" special to air

- "**amazing grace**" network special to air

- "amazing grace" live:

- **limited theatrical run for qualifying for awards season**

2016

january:

- "live tour" preview at **stellar awards**, january 18, 2016.

* we would have a performance of the live tour presentation featuring the choir, the band, the projection of the movie and **ARETHA would be performing.**

(\$50k)

(total: \$650k)

- "live tour" preview at **grammy awards**, february, 2016.

* we would have a performance of the live tour presentation featuring the choir, the band, the projection of the movie and **ARETHA would be performing.**

(\$50k)

(total: \$700k)

February:

Ken Ehrlich post-grammy special:

(\$200k)

(total: \$900k)

June- September:

- "amazing_grace_live" tour/US
- outdoor arenas, late spring, summer 2016 (hollywood bowl, saratoga, etc.)
- ARETHA sing three songs with choir..

(\$400k @ \$50k*8 dates)

(total: \$1.3m)

September- October:

- "amazing_grace_live" tour/europe
 - harvey goldsmith wants to present the tour in europe (<http://www.harveygoldsmith.com/about/>)
 - ARETHA would do a filmed intro.
- **bbc special**
- a history of modern gospel leading to "amazing grace"
- * co-produced with arena/bbc
- * will build momentum/word of mouth for european tour
- * ARETHA would do an interview.

(\$400k @ \$50k*8 dates)

(total: \$1.7m)

thank you.

-alan

phone: 323 988 9692

This email 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.

On Jul 22, 2015, at 1:12 PM, Liesl Copland <LCopland@wmeentertainment.com> wrote:

Amazon called me to say hold on a call and talked with me about a favor ICM owes us they want to call in here. I said we have to understand the playing field a bit more with regards to them a) having the rights then b) going to get stuff done and he understood and started asking questions along the lines of "if Aretha needs a bigger check..." will we pitch in. I said we can't do this that way and he asked to think about his economics and come back to us.

Liesl Copland | WME

LCopland@wmeentertainment.com

310.246.3383

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

Sent: Wednesday, July 22, 2015 1:04 PM

To: harmoni@amazon.com

Cc: Todd Musburger; Ted Hope; Liesl Copland; Tom McGuire; jkramer@amazon.com
Subject: Fwd: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post

hi harmoni and everone-

as promised... and now delivered... the insurance, no exclusions.

thank you.

-alan

phone: 323 988 9692

This email 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.

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Subject: FW: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post
Date: July 22, 2015 at 12:32:48 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Cc: Stephen Carroll <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.

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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the

for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.



From: Todd Musburger todd@musburger.com
Subject: Re: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post
Date: July 22, 2015 at 1:53 PM
To: Cruz, Harmoni harmoni@amazon.com
Cc: alan elliott (ucla) alanelliott@g.ucla.edu, Hope, Ted ted.hope@amazonstudios.com, Liesl Copland LCopland@wmeentertainment.com, Tom McGuire tmcguire@wmeentertainment.com, Kramer, Josh jkramer@amazon.com, Heintz, Matthew heintz@amazon.com, Patel, Ajay ajayp@amazon.com

Harmoni : I have made a fresh request for it... Not sure if they are used to presenting it or not but I will stay on it for you ... Thanks ,
Todd

iPhone Transmission Please excuse Typos & Peculiar abbreviations

On Jul 22, 2015, at 3:20 PM, Cruz, Harmoni <harmoni@amazon.com> wrote:

Thanks, Alan. I'm looping in Matthew and Ajay from our Amazon legal team as well.

In one of the previous docs, we noted a reference to a legal opinion letter re chain of title for the film. Do you or your agent/broker have this on hand? We'd like to see a copy of the letter to assist with our review.

Thanks,
Harmoni

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Wednesday, July 22, 2015 1:04 PM
To: Cruz, Harmoni
Cc: Todd Musburger; Hope, Ted; Liesl Copland; Tom McGuire; Kramer, Josh
Subject: Fwd: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post

hi harmoni and everone-

as promised... and now delivered... the insurance, no exclusions.

thank you.

-alan

phone: 323 988 9692

This email 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.

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Subject: FW: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post
Date: July 22, 2015 at 12:32:48 PM PDT

To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Cc: Stephen Carroll <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.

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

Before you print, think about the ENVIRONMENT 🌱

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

<Binder - EO - 15-18 Amazing Grace.pdf>

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Fwd: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post
Date: July 22, 2015 at 2:23 PM
To: Simon Osborn simon@protagonistpictures.com, Mike Goodridge mike@protagonistpictures.com
Cc: Todd W. Musburger todd@musburger.com



hi mike and simon-

as promised... and now delivered... the insurance, no exclusions.

thank you.

-alan

phone: 323 988 9692

This email 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.

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Subject: FW: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post
Date: July 22, 2015 at 12:32:48 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Cc: Stephen Carroll <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.

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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.



Binder - EO -
15-18...ce.pdf

From: Hope, Ted ted.hope@amazonstudios.com
Subject: Re: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post
Date: July 25, 2015 at 3:36 PM
To: alan elliott (ucla) alanelliott@g.ucla.edu, Liesl Copland LCopland@wmeentertainment.com, Todd Musburger todd@musburger.com
Cc: Avy Eschenasy avy@eschenasy.com, Kramer, Josh jkramer@amazon.com



JUST to be clear and so there is no confusion, this is not what we, Amazon, will be presenting when we speak to Aretha's attorney next week. We will be offering \$450K (\$250K additional from Amazon, and \$200K reduced from the advance we were offering Alan. Additionally we will make clear our interest in developing a bio-pic on Aretha and would be willing to provide an additional life rights option as well as the necessary development funds. But this will be a take it or leave it offer and will have to move on if a deal can not be made and we can not get Aretha to sign.

Ted

From: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Date: Wednesday, July 22, 2015 at 2:34 PM
To: "Hope, Ted" <ted.hope@amazonstudios.com>
Subject: Fwd: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post

thank you.

-alan

phone: 323 988 9692

This email 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.

Begin forwarded message:

From: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Subject: Re: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post
Date: July 22, 2015 at 1:48:52 PM PDT
To: Liesl Copland <LCopland@wmeentertainment.com>
Cc: "Todd W. Musburger" <todd@musburger.com>, Tom McGuire <TMcGuire@wmeentertainment.com>

below is a proposal i have talked with ted about presenting AFTER amazon gets in. aretha is going to ask for \$1m up front... and that's gonna end things (icm is not gonna help here).

Executives at Warner Music Group anticipate that Ms. Franklin's participation in the scheduled events will increase catalog sales between \$2m-3m for the forthcoming year alone. The

[amazing grace plan 2015/2016:](#)

[August](#)

first- to finish the film with Ms. Franklin

- open the movie with an original song.
- her doing a 2-3 min. opening of film
- a "commentary" for dvd

(\$250k)

(Total: \$250k)

we would work out a schedule of "appearance fees" (e.g.:

- press tour (possible interviews):

- * "the view"
- * "ellen"
- * "wendy williams"
- * "steve harvey"
- * "the today show"
- * "60 mins."
- * "gma"
- * "katie"
- * "kelly and mike"
- * "the talk"
- * "cbs this morning"
- * newspapers, various others

(\$100k)

(Total: \$350k)

- telluride
- Toronto
- nyff

- taping of "oprah's next chapter"

+ **ARETHA would be interviewed by oprah.**

(\$50k)

(Total: \$400k)

small pre-film release shows... (whereby she appears for 3 songs with choir, band)

- hollywood bowl
- apollo

(\$100k)

(Total: \$500k)

October:

- taping of "amazing grace" special at the kennedy center- president obama to presidential medal of freedom (for the second time! only a few people have ever gotten multiple awards)

* a network special featuring:

+ performances from the live tour

- performances from the live tour:

- + guest stars performing songs from the original "amazing grace" album
- + taped interviews discussing aretha, the history of the project, and the songs/music
- + **ARETHA would be performing and of course, be the honoree.**
- * the president and first lady have said they would attend

(\$100k)

(total: \$600k)

November-December:

- "oprah's next chapter" special to air
- "amazing grace" network special to air
- "amazing grace" live:
- limited theatrical run for qualifying for awards season

2016

january:

- "live tour" preview at stellar awards, january 18. 2016.
- * we would have a performance of the live tour presentation featuring the choir, the band, the projection of the movie and **ARETHA would be performing.**

(\$50k)

(total: \$650k)

- "live tour" preview at grammy awards, february, 2016.
- * we would have a performance of the live tour presentation featuring the choir, the band, the projection of the movie and **ARETHA would be performing.**

(\$50k)

(total: \$700k)

February:

Ken Ehrlich post-grammy special:

(\$200k)

(total: \$900k)

June- September:

- "amazing grace live" tour/US
- outdoor arenas, late spring, summer 2016 (hollywood bowl, saratoga, etc,)
- **ARETHA sing three songs with choir..**

(\$400k @ \$50k*8 dates)

(total: \$1.3m)

September- October:

- "amazing grace live" tour/europe
 - harvey goldsmith wants to present the tour in europe (<http://www.harveygoldsmith.com/about/>)
- **ARETHA would do a filmed intro.**
- **bbc special**
- a history of modern gospel leading to "amazing grace"
- * co-produced with arena/bbc
- * will build momentum/word of mouth for european tour
- * **ARETHA would do an interview.**

(\$400k @ \$50k*8 dates)

(total: \$1.7m)
thank you.

-alan

phone: 323 988 9692

This email 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.

On Jul 22, 2015, at 1:12 PM, Liesl Copland <LCopland@wmeentertainment.com> wrote:

Amazon called me to say hold on a call and talked with me about a favor ICM owes us they want to call in here. I said we have to understand the playing field a bit more with regards to them a) having the rights then b) going to get stuff done and he understood and started asking questions along the lines of "if Aretha needs a bigger check..." will we pitch in. I said we can't do this that way and he asked to think about his economics and come back to us.

Liesl Copland | WME
LCopland@wmeentertainment.com
310.246.3383

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Wednesday, July 22, 2015 1:04 PM
To: harmoni@amazon.com
Cc: Todd Musburger; Ted Hope; Liesl Copland; Tom McGuire; jkramer@amazon.com
Subject: Fwd: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post

hi harmoni and everone-

as promised... and now delivered... the insurance, no exclusions.

thank you.

-alan

phone: 323 988 9692

This email 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.

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Subject: FW: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post
Date: July 22, 2015 at 12:32:48 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Cc: Stephen Carroll <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.

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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Re: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post
Date: July 29, 2015 at 1:37 PM
To: Annette Shavuo annette.shavuo@aon.com
Cc: Stephen Carroll stephen.carroll@aon.com, Todd W. Musburger todd@musburger.com



hello annette

attached is the signed copy and application. still outstanding is:

- the corbis stock shot
- publishing rights (i should have in next two weeks- still

thank you.

-alan



amazing grace
App- R...03.doc



State National Insurance Company, Inc.
Administered by Hiscox Inc.

Video, film and television producers application

NOTICE TO NEW MEXICO RESIDENT APPLICANTS: Any person who knowingly presents false information in an application for insurance is guilty of a crime and may be subject to civil fines and criminal penalties.

NOTICE TO NEW YORK RESIDENT APPLICANTS: Any persons who knowingly and with the intent to defraud any insurance company or other person files an application for insurance or statement of claim containing any materially false information or conceals for purpose of misleading, information concerning any fact material thereto, commits a fraudulent insurance act, which is a crime and also be subject to a civil penalty not to exceed five thousand dollars and the stated value of the claim for each such violation.

NOTICE TO OHIO RESIDENT APPLICANTS: Any person who, with the intent to defraud or knowing that he is facilitating a fraud an insurer, submits an application or files a claim containing a false or deceptive statement is guilty of insurance fraud.

NOTICE TO OKLAHOMA RESIDENT APPLICANTS: WARNING: Any person who knowingly and with the intent to injure, defraud or deceive any insurer, makes any claim for the proceeds of an insurance policy containing any false, incomplete or misleading information is guilty of a felony.

NOTICE TO PENNSYLVANIA RESIDENT APPLICANTS: Any person who knowingly and with the intent to defraud any insurance company or other person files an application for insurance or statement of claim containing any materially false information or conceals for the purpose of misleading, information concerning any fact thereto commits a fraudulent insurance act, which is a crime and subjects such a person to criminal and civil penalties.

NOTICE TO UTAH RESIDENT APPLICANTS: For your protection, Utah law requires the following to be included in this application: Any person who knowingly presents false or fraudulent underwriting information, files or causes to be filed a false or fraudulent claim for disability compensation or medical benefits, or submits a false or fraudulent report or billing for health care fees or other professional services is guilty of a crime and may be subject to fines and confinement in state prison.

NOTICE TO VIRGINIA RESIDENT APPLICANTS: It is a crime to knowingly provide false, incomplete or misleading information to an insurance company for the purpose of defrauding the company. Penalties include imprisonment, fines and denial of insurance benefits.

NOTICE TO WASHINGTON RESIDENT APPLICANTS: It is a crime to knowingly provide false, incomplete, or misleading information to an insurance company for the purposes of defrauding the company. Penalties include imprisonment, fines and denial of insurance benefits.

NOTICE TO WEST VIRGINIA RESIDENT APPLICANTS: Any person who knowingly presents a false or fraudulent claim for payment of a loss or benefit or knowingly presents false information in an application for insurance is guilty of a crime and may be subject to fines and confinement in prison.

Signature	6.22.15
	Date (mm/dd/yyyy)
PRODUCER	
Title	
Agent's License Number:	
Agent's Name:	
A copy of this application should be retained for your records.	
US PRO APP 01.1 (A) (ed. 10/07)	
6 of	

phone: 323 988 9692

This email 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.

On Jul 22, 2015, at 12:32 PM, Annette Shavuo <annette.shavuo@aon.com> wrote:

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

Before you print, think about the ENVIRONMENT 🌱

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

<Binder - EO - 15-18 Amazing Grace.pdf><App- REVISED Q#22 -E&O Video Film and Television Producers Application Admitted_Word1203.doc>

From: Alan Elliott alanelliott@concordbicycle.com 
Subject: Fwd: Al's Records and Tapes / Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802] - CHUBB 82213781
Date: August 9, 2017 at 7:17 PM
To: waldave@chubb.com



hi walter

is there a good time to discuss this in the next few days?

please let me know.

thank you.

-alan

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

peace and love.

Begin forwarded message:

From: Winnie Wong <WWong@mmibi.com>
Date: July 6, 2017 at 4:32:28 PM PDT
To: Alan Elliot <alanelliott@concordbicycle.com>
Subject: Al's Records and Tapes / Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802] - CHUBB 82213781

Alan,

You are welcome to follow up with Walter directly – phone (860) 408-2529. See my email below. Thanks.

Winnie Wong
Senior Vice President
Momentous Insurance Brokerage, Inc.
5990 Sepulveda Blvd. Suite 550
Van Nuys, CA 91411
P: 818.933.2735 / F: 818.933.2793
E: WWong@mmibi.com
[Website](#) | [Blog](#)
Lic. #0G19762



This email and any files transmitted with it are confidential and are intended solely for the use of the individual or entity to whom they are addressed and may be legally privileged. If you are NOT the intended recipient or the person responsible for delivering this email to the **intended recipient**, be advised that you have received this email in error and that any use, dissemination, forwarding, printing, or copying of this email is strictly prohibited. Momentous Insurance Brokerage, Inc., and/or its subsidiaries is neither liable for the proper and complete transmission of the information contained in this communication nor for any delay in its receipt.

From: Winnie Wong
Sent: Tuesday, June 27, 2017 12:02 PM
To: 'waldave@chubb.com'
Cc: Nick Kozonis
Subject: Al's Records and Tapes / Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802] - CHUBB 82213781
Importance: High

Walter,

I hope all is going well. Yesterday, I received the attached letter from an attorney representing Hiscox Insurance. They indicated that the Aretha Franklin lawsuit arose before the issuance of the policy.

I would really appreciate it if you would contact the insured Alan Elliott and have a legal response provided to him.

Thanks for all your help.

Winnie

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

Sent: Monday, June 26, 2017 8:27 PM

To: Winnie Wong

Subject: Fwd: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

let's please discuss tomorrow.

thank you.

-alan

[Redacted]

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

peace and love.

Begin forwarded message:

From: "Cope, Victoria" <Victoria.Cope@clydeco.us>

Date: June 26, 2017 at 1:03:58 PM PDT

To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>

Cc: "Bertschi, Scott" <Scott.Bertschi@clydeco.us>, "maria.clark@aon.com" <maria.clark@aon.com>, Bodden Tara <Tara.Bodden@HISCOX.com>

Subject: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

Dear Mr. Elliott:

Please see the attached correspondence from Scott Bertschi in the above-referenced matter.

Should you have any questions or concerns, please do not hesitate to contact us.

Thank you,

Victoria Cope

Legal Administrative Assistant | Clyde & Co US LLP

Direct Dial: +1 404 410 3160 | **Mobile:** +1 404 374 5461



Hiscox_Amazing
Grace...17).pdf

From: Winnie Wong WWong@mmibi.com 
Subject: Al's Records and Tapes / Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802] - CHUBB 82213781
Date: July 6, 2017 at 4:33 PM
To: Alan Elliot alanelliott@concordbicycle.com



Alan,

You are welcome to follow up with Walter directly – phone (860) 408-2529. See my email below. Thanks.

Winnie Wong
Senior Vice President
Momentous Insurance Brokerage, Inc.
5990 Sepulveda Blvd. Suite 550
Van Nuys, CA 91411
P: 818.933.2735 / F: 818.933.2793
E: WWong@mmibi.com
[Website](#) | [Blog](#)
Lic. #0G19762



This email and any files transmitted with it are confidential and are intended solely for the use of the individual or entity to whom they are addressed and may be legally privileged. If you are NOT the intended recipient or the person responsible for delivering this email to the **intended recipient**, be advised that you have received this email in error and that any use, dissemination, forwarding, printing, or copying of this email is strictly prohibited. Momentous Insurance Brokerage, Inc., and/or its subsidiaries is neither liable for the proper and complete transmission of the information contained in this communication nor for any delay in its receipt.

From: Winnie Wong
Sent: Tuesday, June 27, 2017 12:02 PM
To: 'waldave@chubb.com'
Cc: Nick Kozonis
Subject: Al's Records and Tapes / Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802] - CHUBB 82213781
Importance: High

Walter,

I hope all is going well. Yesterday, I received the attached letter from an attorney representing Hiscox Insurance. They indicated that the Aretha Franklin lawsuit arose before the issuance of the policy. I would really appreciate it if you would contact the insured Alan Elliott and have a legal response provided to him.

Thanks for all your help.

Winnie

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Monday, June 26, 2017 8:27 PM
To: Winnie Wong
Subject: Fwd: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

let's please discuss tomorrow.

thank you.

-alan

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

peace and love.

Begin forwarded message:

From: "Cope, Victoria" <Victoria.Cope@clydeco.us>
Date: June 26, 2017 at 1:03:58 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Cc: "Bertschi, Scott" <Scott.Bertschi@clydeco.us>, "maria.clark@aon.com" <maria.clark@aon.com>, Bodden Tara <Tara.Bodden@HISCOX.com>
Subject: **Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]**

Dear Mr. Elliott:

Please see the attached correspondence from Scott Bertschi in the above-referenced matter.

Should you have any questions or concerns, please do not hesitate to contact us.

Thank you,

Victoria Cope
Legal Administrative Assistant | Clyde & Co US LLP
Direct Dial: +1 404 410 3160 | Mobile: +1 404 374 5461



Hiscox_Amazing
Grace...17).pdf

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Re: Amazing Grace - chain of title
Date: July 15, 2015 at 7:33 AM
To: Simon Osborn simon@protagonistpictures.com
Cc: Todd W. Musburger todd@musburger.com, Mike Goodridge mike@protagonistpictures.com



hi simon

more answers below.

thank you.

-alan

phone: 323 988 9692

This email 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@alaneliott.net.

On Jul 15, 2015, at 3:15 AM, Simon Osborn <simon@protagonistpictures.com> wrote:

Thanks Alan, this helps clear up a number of my questions.

- Given you screened the film in advance of the deadline, do you have a written acknowledgement from WB that the quitclaim is now effective and they have waived their rights? It's important that we have formal confirmation of that.

i believe we have emails and various phone calls.

- I note that their \$35,000 hasn't been paid. The documents do say it becomes due once you obtain financing, rather than when the film is finished but appreciate this is probably just a question of timing. I imagine, however, they may be unwilling to formally acknowledge their waiver of rights until they have received those amounts? It would be good to know they are willing to confirm the same though.

ok.

- Importantly, that acknowledgement will specifically need to waive their rights to acquire future distribution rights and their rights of consultation over future exploitation of the film.

they have.

- I saw all the releases for the choir but couldn't distinguish agreements for the producer, director, camera operators. Can you please point me to those?

the releases are in this file:

<http://alsrecordsandtapes.com/amazinglaw/wbdocs/>

amongst them, sydney pollack's producing/directing:

<http://alsrecordsandtapes.com/amazinglaw/wbdocs/wb%20legal%20pollack%20payment.pdf>

- Again, excuse my ignorance but does the film only use material from the original recordings?

the recording had TWO separate 16 track master recordings- one for the film company and one for the record company.

- Or have you included footage that was shot recently?

no

no.

- My point was that we would of course need releases for the recent material as well, if any. If that doesn't apply, there's no issue.

ok

- Given the explanations below and the insurance (of which it would be great to see a copy of the policy), I'm comfortable with the questions over the approvals from Aretha Franklin.

here you go:

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.

	Email	Mail	Both
Policy Delivery Via:			

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.

Amazing Grace, LLC. – July 8, 2015

Page 4
AGR PropNC Edition 06/26/14



T&D Insurance
Propos...O.PDF

(question #22 has now been satisfied.)

Best

thank you!

Simon

From: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Date: Tuesday, 14 July 2015 17:28
To: Simon Osborn <simon@protagonistpictures.com>
Cc: "Todd W. Musburger" <todd@musburger.com>, Mike Goodridge <mike@protagonistpictures.com>
Subject: Re: Amazing Grace - chain of title

hi simon and mike

we have some answers below:

I'm not fully up to speed on this project so forgive me if some of these questions have very obvious answers, but on a simple review of the documents provided I do have a few comments/queries as per the below:

- The quitclaim, as amended, says that the finished film must be delivered to Warner Bros by 31 December 2012, otherwise all rights revert to them. Was that achieved or, alternatively, has this deadline been further extended?

i delivered (and screened for wb on march 9, 2012)

- Furthermore, none of the quitclaim documents has a complete schedule of the film elements . Both documents make reference to a Schedule which is not included, so it's not clear to which materials we are referring.

they sent a list which you can find here:

<http://alsrecordsandtapes.com/amazinglaw/wbdocs/PostProd-Aretha%20Franklin%20Inventory12.4.07.xls>

- The quitclaim also grants Warner Bros a right of first negotiation and first refusal over all distribution rights and a further right of consultation over the film's exploitation. Have those rights been waived? Certainly from a sales perspective, they would need to be.

they have been waived.

- To the extent that the film has been presented to Warner Bros, do you have evidence that their payment has been made? We would of course need formal acknowledgement of their complete waiver of rights.

they have NOT been paid (and are not owed until i am fully funded).

- Unless otherwise indicated, I'm assuming the releases provided are just for the members of the choir.

yes.

- Do you have releases for the other contributors to the original production – producers, director, choir master, etc?

yes- they are in the docs.

- Do you have releases for any more recent contributions, if any?

not sure what you would need?

- The release for the original photographer appears to use the form that was drafted for singers in the choir. Whilst it gives rights to use their image, it doesn't give you rights to use any photos they may have taken.

we aren't using them. (he was a still photographer.)

- Are you able to locate all the original contributors to ensure they are paid the residuals due?

yes.

- Notwithstanding the legal opinion from Donaldson & Califf, to my mind the Aretha Franklin agreements relates to her services 'in connection with the production of phonograph records', not film recordings.

see below. please keep in mind, ms. franklin's "personal service contract" was with the record company (atlantic) AND a film company (warner seven arts). the contract was also relied on twice prior (see below) by wb FILMS to distribute iterations of the FILM.

- It would seem that both her and her agent are keen for the project to go ahead but I think we would need to at least see a more formal acknowledgement of that.

better than a formal acknowledgment, we now have insurance from hiscox for this specifically.

here is the email from the insurer:

here is the email from the insured:

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 claim 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 let me know if you have any further questions.

Best,
Joanne

Joanne Richardson, CPCU
Media & Entertainment Practice Leader
Hiscox Partner

and so you have the complete position legally:

the film and the elements therein are my property. and as such, I have the rights to do what I want with them.

1) chain of title

a) ALAN ELLIOTT/WB TIMELINE:

2007 quitclaim from WB in

2011 amendment

2013- Aretha's contract given to me by Steve Spira

in sum:

Warners quitclaimed the film and all documents, including Aretha's personal service contract with Warner Seven-Arts FILM company and Atlantic RECORDS.

b) Warner films AND Atlantic records separately used the footage that they could sync on two different occasions in DVDs they have sold.

i. "Aretha Franklin, Queen of Soul: American Masters": available now

at:<http://www.tower.com/queen-soul-aretha-franklin-vhs/wapi/106077119>

ii. "atlantic's 25th anniversary"[winner of a prize at the atlanta film festival in 1973!}).
(<http://alsrecordsandtapes.com/amazinglaw/wbdocs/ATLANTAFILMFESTIVAL.tiff>)
footage of the film is here: <https://www.youtube.com/watch?v=8HUiEYh32Vc>

iii. the reason the film as a whole was never released was because of sync issues:
please see memo from 1972... showing that wb paid the choir director to help sync the
footage! see here:
[http://alsrecordsandtapes.com/amazinglaw/wbdocs/wb%20memo%20for%20lip%20sync%20O\\$\\$_.pdf](http://alsrecordsandtapes.com/amazinglaw/wbdocs/wb%20memo%20for%20lip%20sync%20O$$_.pdf)

c) andrew bart, who successfully defended, in new york state, greenfield vs. spector:

i.) aretha's contract reads (made in new york):

"4. All recording hereunder and **all derivatives made therefrom**, together with the performances embodied thereon, shall be entirely Company's property. Artist grants to Company ... (b) the right to use and publish, and to permit others to use and publish, the Artist's name and likeness... (c) the sole and exclusive rights in, title to and ownership of all recordings made hereunder,' including, **but not limited to, the right to use and control all masters, matrices, records or other reproductions of the performances embodied in such recordings by any method, electronic, magnetic, mechanical or other, now or hereafter know, obtained from recordings made here- under the performances embodied therein**;"

ii. greenfield vs. spector is, "controlling binding precedent in new york state and has been cited 100s of times as property law and absolute title across the country."

iii. The pivotal issue in this case is whether defendants are prohibited from using the master recordings for synchronization, and whatever future formats evolve from new technologies, in the absence of explicit contract language authorizing such uses... We conclude that it does not and, because there is no ambiguity in the terms of the Ronettes contract, defendants are entitled to exercise complete ownership rights, subject to payment of applicable royalties due plaintiffs."

iv. aretha, warner seven arts and atlantic records would be subject to this precedent in new york on any litigation.

v. bart detailed that the threshold to qualify for getting a case heard would be high- and costly for anyone bringing suit against me (and p.s.- i have insurance- and indemnification!)

d) there is a separate indemnification agreement in aretha's personal service contract with warner seven arts... which places ALL legal costs back to Atlantic in case ANY litigation should arise.

e) to be clear, neither warner seven arts nor warner brothers records were aretha franklin's record company- ATLANTIC RECORDS was.

i. mo ostin, president of warner brothers records from 1969-1994, is a personal friend and if need be, can be reached at 310.230.3030.

ii. to see the history of warner-seven arts: https://en.wikipedia.org/wiki/Warner_Bros.-Seven_Arts

f) ms. franklin's "personal service agreement" differs from other typical "recording agreements" in that it engages ms. franklin:

"exclusive personal services during the term hereof in connection with the production of phonograph records."

compared with (language found in all other examples we have found reads):

"ARTIST'S exclusive personal services as a recording artist in connection with the production of records"

g) joe boyd is the highest ranking official still alive from the wb days.

we have a signed letter from joe boyd, director of music services at wb films and the guy whose job it was to get ALL releases at the filming, saying "wb relied on the personal service contract."

2) again, there is insurance.

hiscox has given me insurance- with no exclusions. the coverage also covers the warners' agreement with aretha (which, the insurance company sees as part of my quitclaim- and which has built in indemnification with atlantic records).

I look forward to your thoughts on the above.

With kind regards

Simon Osborn

Head of Legal and Business Affairs

Protagonist Pictures Limited

Fourth Floor, 42-48 Great Portland Street

London W1W 7NB

United Kingdom

Tel: +44 (0)207 734 9000

www.protagonistpictures.com

www.twitter.com/protagonistpics

From: Todd Musburger todd@musburger.com 
Subject: Fwd: Amazing Grace - CoT
Date: August 28, 2015 at 9:59 AM
To: ALAN ELLIOTT alanelliott@g.ucla.edu



You can weigh in on this to me...I will add my twist and send to him...

Todd W. Musburger
Todd W. Musburger, Ltd.
142 E. Ontario
Suite 500
Chicago, Illinois 60611
312 664 2600

----- Forwarded message -----

From: Justin Kelly <jk@recordedpicture.com>
Date: Fri, Aug 28, 2015 at 11:55 AM
Subject: Re: Amazing Grace - CoT
To: Todd Musburger <todd@musburger.com>
Cc: Thomas Mann <tm@recordedpicture.com>

Dear Todd

Thank you for the link to the web site although the documents contained there are what we have already been provided. I would therefore be grateful if, in addition to the points detailed in my below email of 26 August, you could clarify/comment regarding:

- is there a copy of Sydney Pollack's Director Agreement?
- What Jeremy Wexler contractual arrangements were in force at the relevant times?
- what other amendments were there to the Warners Quitclaim other than that dated November 2, 2010?
- I understand you don't have a copy of the Schedule A referred to in the Amendment dated November 2, 2010;
- obtaining email confirmation from Warners that they no longer have their First Negotiation/First Refusal right;
- paperwork for the three remaining songs; and
- what if anything is proposed regarding SAG as per the attached memo?

Thanks and best wishes

Justin

Justin Kelly | Head of Business & Legal Affairs | Recorded Picture Company | Hanway Films | 24 Hanway Street, London W1T 1UH | Tel [+44 20 7290 0761](tel:+442072900761) | Mob [+44 7957 420195](tel:+447957420195) | www.recordedpicture.com | www.hanwayfilm.com |

On 26 August 2015 at 11:21, Justin Kelly <jk@recordedpicture.com> wrote:

Great thanks Todd and it was a pleasure to speak with you yesterday. In case of use I attach my notes of our call.

Re the E&O:

1. please can you clarify the effect of Endorsement 6 re date of performance?
2. please can you notify me when Endorsement 8 is removed re failure to obtain licences?; and
3. the additional insured wording for Hanway is:

"Hanway Films Limited and all its successors, affiliates, subsidiaries, assigns, licensees and subdistributors and the officers, directors, agents and employees of each of the foregoing are included as Additional Insured as respects to liability coverage."

Thanks and best wishes

Justin

Justin Kelly | Head of Business & Legal Affairs | Recorded Picture Company | Hanway Films | 24 Hanway Street, London W1T 1UH | Tel [+44 20 7290 0761](tel:+442072900761) | Mob [+44 7957 420195](tel:+447957420195) | www.recordedpicture.com | www.hanwayfilm.com |

On 25 August 2015 at 21:14, Todd Musburger <todd@musburger.com> wrote:

Justin: Insurance docs attached...

Todd W. Musburger
Todd W. Musburger, Ltd.
142 E. Ontario
Suite 500
Chicago, Illinois 60611
[312 664 2600](tel:3126642600)

----- Forwarded message -----

Forwarded message
From: **alan elliott (ucla)** <alanelliott@g.ucla.edu>
Date: Tue, Aug 25, 2015 at 3:01 PM
Subject: Fwd: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post
To: Todd Musburger <todd@musburger.com>

thank you.

-alan

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

This email 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.

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Subject: FW: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post
Date: July 22, 2015 at 12:32:48 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Cc: Stephen Carroll <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

177 Madison Avenue, Suite 401
New York, NY 10016
Tel: (212) 627-7400 / Direct: (212) 463-5586
Fax: (212) 633-1457 / Direct: (847) 953-0849

Before you print, think about the ENVIRONMENT 🌱

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

RECEIVED

FEB 11 1972

CFG

INTER-OFFICE MEMO
WARNER BROS. INC.

TO: CHARLES GREENLAW

FROM: ~~ED MOREY~~ RON BRUNO

SUBJECT: _____

DATE: FEBRUARY 10, 1972

COPIES TO: ED MOREY, ARTHUR SCHAEFER

As I indicated to you in our discussion, Phil Diezen of the Screen Actors Guild called me on 2-9-72 and stated that he had received a call from a member of the choral group which we had recorded and photographed in connection with the Aretha Franklin album. It was his understanding that we had paid the group a session fee for the recording but had not made payment for the photography.

As a result of our meeting with Ed Morey on 2-10-72, I advised Phil Diezen that his facts were correct. I asked him to regard the photography as, in effect, "a home movie". He agreed, with the stipulation that if and when we decide what to do with the film, we advise the Guild immediately and make SAG minimum payments (if appropriate) to the individual members of the choral group.



RON BRUNO

RB:grm

From the Desk of

JOYCE COLLING

2/7/72 - Had a call from Mary at Cinemobile (652-4800) requesting information on the Aretha Franklin documentary: producer, director, cinematographer

2/8/72 - Called Mary and told her there was no photographer, director was Sydney Pollack and they supplied the cinematographer - but that there was to be (per Mr. Greenlaw) NO publicity on it.

Right after the above call, Mike Elliott of Cinemobile called, re using the above information in their ads or, if they left out S. Pollack's name, could they just use "A.F. documentary-WB". Checked Mr. G., called Mike back and told him there was to be NO PUBLICITY ON THE DOCUMENTARY AT ALL. He said he would kill it in all their ads.

From: Larry Blake larry.blake@concordmusicgroup.com
Subject: Amazing Grace / E&O Policy
Date: July 11, 2016 at 3:34 PM
To: stephen.carroll@aon.com
Cc: alan elliott (ucla) alanelliott@g.ucla.edu



Hi Stephen:

Alan Elliott asked me to call you. I got your voicemail when I called about 50 minutes ago.

Please advise as to your available times for you and I to talk.

Thanks,

Larry

Larry Blake
Chief Legal & Business Affairs Officer
Concord Bicycle Music
100 N. Crescent Dr., Garden Level
Beverly Hills, CA 90210
Larry.Blake@concordmusicgroup.com
(O)310.385.4205

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Re: Amazing Grace - E&O
Date: August 26, 2015 at 8:56 AM
To: Todd Musburger todd@musburger.com



do you need anything from me here?

thank you.

-alan

phone: 323 988 9692

This email 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.

On Aug 26, 2015, at 7:59 AM, Todd Musburger <todd@musburger.com> wrote:

Todd W. Musburger
Todd W. Musburger, Ltd.
142 E. Ontario
Suite 500
Chicago, Illinois 60611
312 664 2600

----- Forwarded message -----

From: Justin Kelly <jk@recordedpicture.com>
Date: Wed, Aug 26, 2015 at 5:21 AM
Subject: Amazing Grace - E&O
To: Todd Musburger <todd@musburger.com>
Cc: Thomas Mann <tm@recordedpicture.com>

Great thanks Todd and it was a pleasure to speak with you yesterday. In case of use I attach my notes of our call.

Re the E&O:

1. please can you clarify the effect of Endorsement 6 re date of performance?
2. please can you notify me when Endorsement 8 is removed re failure to obtain licences?; and
3. the additional insured wording for Hanway is:

"Hanway Films Limited and all its successors, affiliates, subsidiaries, assigns, licensees and subdistributors and the officers, directors, agents and employees of each of the foregoing are included as Additional Insured as respects to liability coverage."

Thanks and best wishes

Justin

Justin Kelly | Head of Business & Legal Affairs | Recorded Picture Company | Hanway Films | 24 Hanway Street, London W1T 1UH
| Tel [+44 20 7290 0761](tel:+442072900761) | Mob [+44 7957 420195](tel:+447957420195) | www.recordedpicture.com | www.hanwayfilm.com |

On 25 August 2015 at 21:14, Todd Musburger <todd@musburger.com> wrote:

Justin: Insurance docs attached...

Todd W. Musburger
Todd W. Musburger, Ltd.
142 E. Ontario
Suite 500
Chicago, Illinois 60611
[312 664 2600](tel:3126642600)

----- Forwarded message -----

From: alan elliott (ucla) <alanelliott@g.ucla.edu>

Date: Tue, Aug 25, 2015 at 3:01 PM
Subject: Fwd: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post
To: Todd Musburger <todd@musburger.com>

thank you.

-alan

phone: 323 988 9692

This email 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.

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Subject: FW: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post
Date: July 22, 2015 at 12:32:48 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Cc: Stephen Carroll <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](tel:(212)627-7400) / Direct: [\(212\) 463-5586](tel:(212)463-5586)

Fax: [\(212\) 633-1457](tel:(212)633-1457) / Direct: [\(847\) 953-0849](tel:(847)953-0849)

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

<Aretha-JK notes re telcon with Todd Musburger on 25 August 2015.docx>

From: john battsek john@passion-pictures.com 
Subject: Re: Amazing Grace
Date: March 12, 2015 at 6:12 PM
To: alan elliott (ucla) alanelliott@g.ucla.edu
Cc: Todd W. Musburger todd@musburger.com



Todd any developments today on the Final Cut deal situation?

Best

jb

JOHN BATTSEK
PRODUCER - MD

3RD FLOOR
KIRKMAN HOUSE
12-14 WHITFIELD STREET
LONDON W1T 2RF
+44 (0)20 7323 9933
+44 (0)7770 920 064
+1 646 248 2605
PASSION-PICTURES.COM



From: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Date: Wednesday, 11 March 2015 16:01
To: Stephen Carroll <stephen.carroll@aon.com>
Cc: "Ramona V. Horne" <ramona.horne@aon.com>, George Chignell <georgec@passion-pictures.com>, Office 2004 Test Drive User <john@passion-pictures.com>, Joe Boyd <boyd1j@yahoo.co.uk>, "Todd W. Musburger" <todd@musburger.com>
Subject: Re: Amazing Grace

hi stephen

good stuff. Todd Musburger (the attorney)(cc'd here) will call and sort through.

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.

On Mar 11, 2015, at 8:13 AM, Stephen Carroll <stephen.carroll@aon.com> wrote:

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



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.

On Mar 4, 2015, at 12:25 PM, Stephen Carroll <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



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.

On Feb 27, 2015, at 1:42 PM, Stephen Carroll <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
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> 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
Cell: 914-589-2474
Fax: 847-953-2692

<Amazing Grace Hiscox Quote.PDF>

Registered Address: Passion Pictures Ltd, 33-34 Rathbone Place, London W1T 1JN.
Registration number: 2177709. Registered in England & Wales

Disclaimer

This message (and any associated files) is intended only for the use of the individual or entity to which it is addressed and may contain information that is confidential, subject to copyright or constitutes a trade secret. If you are not the intended recipient you are hereby notified that any dissemination, copying or distribution of this message, or files associated with this message, is strictly prohibited. If you have received this message in error, please notify us immediately by replying to the message and deleting it from your computer. Messages sent to and from us may be monitored.

Internet communications cannot be guaranteed to be secure or error-free as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete, or contain viruses. Therefore, we do not accept responsibility for any errors or omissions that are present in this message, or any attachment, that have arisen as a result of e-mail transmission. If verification is required, please request a hard-copy version. Any views or opinions presented are solely those of the author and do not necessarily represent those of the company.

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Fwd: Amazing Grace
Date: March 18, 2015 at 1:01 PM
To: Matt Farmer mifarmer0@gmail.com



thank you.

-alan

phone: 323 988 9692

This email 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.

Begin forwarded message:

Subject: Re: Amazing Grace
From: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Cc: Ramona.horne@aon.com, George Chignell <georgec@passion-pictures.com>, john battsek <john@passion-pictures.com>, Joe Boyd <boyd1j@yahoo.co.uk>, "Todd W. Musburger" <todd@musburger.com>
Date: February 27, 2015 at 12:50:29 PM PST
To: Stephen Carroll <stephen.carroll@aon.com>

hi stephen

please see answers below.

On Feb 27, 2015, at 11:22 AM, Stephen Carroll <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 F819A5CE-620
6-48F...15E.tiff

Downloading...

- 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
Cell: 914-589-2474
Fax: 847-953-2692

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Re: Amazing Grace
Date: May 18, 2015 at 9:34 AM
To: Stephen Carroll stephen.carroll@aon.com
Cc: Todd W. Musburger todd@musburger.com



hi stephen

can i get a 60 day extension on this quote please?

thank you.

-alan

phone: 323 988 9692

This email 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.

On Mar 4, 2015, at 12:25 PM, Stephen Carroll <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



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.

On Feb 27, 2015, at 1:42 PM, Stephen Carroll <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
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> 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
Cell: 914-589-2474
Fax: 847-953-2692

| <Amazing Grace Hiscox Quote.PDF>

From: Liesl Copland LCopland@wmeentertainment.com
Subject: RE: Amazing Grace!!
Date: July 15, 2015 at 11:30 AM
To: alan elliott (ucla) alanelliott@g.ucla.edu
Cc: Tom McGuire TMcGuire@wmeentertainment.com, Todd W. Musburger todd@musburger.com



I sent a note to Josh and Ted in line with this saying we have a slot held in Toronto, have Friday night opening night in Telluride and “let’s get this done and get to planning” kind of thing. Will chase them down, let me know if you get a response

Liesl Copland | WME
LCopland@wmeentertainment.com
310.246.3383

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Wednesday, July 15, 2015 11:01 AM
To: harmoni@amazon.com
Cc: Ted Hope; Liesl Copland; Tom McGuire; Todd W. Musburger
Subject: Amazing Grace!!

hi harmoni

as todd and you discussed, i am sending:

- the insurance policy (see below- along with signed page from me as well)
- along with the email from the insurer with specific language (the policy has NO exclusions, the wb contract is fully covered bonded and includes the indemnification to atlantic records.)

if there are any questions, todd or i are available. now...

LET’S GO!!!

thank you.
-alan

phone: 323 988 9692

This email 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.

Begin forwarded message:

From: Stephen Carroll <stephen_carroll@aon.com>

From: Stephen Carroll <stephen.carroll@aon.com>

Subject: FW: 2700815 Amazing Grace

Date: July 13, 2015 at 8:12:25 AM PDT

To: "alan elliott (ucla) (alanelliott@g.ucla.edu)" <alanelliott@g.ucla.edu>

Cc: Annette Shavuo <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 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

Connect with Hiscox online

Web www.hiscoxbroker.com

Twitter [@Hiscox_USA](https://twitter.com/Hiscox_USA)

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Fwd: Amazing Grace
Date: September 1, 2017 at 5:25 PM
To: Walter Aldave waldave@chubb.com, Walter Aldave walter.aldave@chubb.com



hello walter

i am checking in to give you a bit more info:

<http://variety.com/2017/film/news/aretha-franklin-documentary-telluride-film-festival-screening-1202541316/>

(In 2015, Franklin sued to prevent a planned public screening of the film at the fest. In a complaint against Telluride filed in U.S. District Court in Colorado, the music icon contended that the 1972 footage “was taken with the express understanding that it would not be used commercially without agreement and consent by Ms. Franklin.” Plans to exhibit the movie, Franklin’s complaint read, were in violation of that (2103) quitclaim agreement she had with the film’s producer, Alan Elliott.)

and to see if there’s a time we might discuss this perhaps next week. please let me know.

thank you.

-alan

phone: 323 988 9692

peace and love.



Begin forwarded message:

From: alan elliott (ucla) <alanelliott@g.ucla.edu>
Subject: Amazing Grace
Date: August 11, 2017 at 11:21:46 AM PDT
To: Walter Aldave <waldave@chubb.com>, Walter Aldave <walter.aldave@chubb.com>

hello walter

thank you again for your time and consideration.

i will send a few emails with a lot of helpful informations.

below is the timeline and the virtual dossier can be found here:

<http://alsrecordsandtapes.com/amazinglaw/wbdocs/>

thank you-

alan

here is hiscox turning down of coverage:



Amazing Grace
- Frank...OC.pdf

here is the timeline:

Amazing Grace:

Amazing Grace basic timeline:

In 1972, Warner films filmed "Amazing Grace"- a documentary film of the recording of the album of the same name. Warners hired Academy Award nominated director Sydney Pollack. The film was made with a film crew, a gospel choir and in a church. All members of the production signed releases/contracts. Ms. Franklin was under "personal service contract" with Warner films.

The release of the documentary was either to be a feature film or a television special and was intended and the film is made mention of inside the film and is included in the album's liner notes.

The movie was unable to be finished due to technical problems (syncing audio and video).

153 mins of the 20+hours of shooting were able to be put together.

Warner Films and Atlantic Records used the 153 minutes in at least two films:

"Atlantic Records 25th Anniversary" in 1973

"Aretha Frankl: Queen of Soul; American Masters" in 1986

Both films are produced by Warner films. "American Masters" was produced by Ms. Franklin and released jointly by Atlantic Records and Warner Films.

in 2007, Warner Films gave me quitclaim.

in 2010, new technology allowed for sync between the film with the audio.

Major points:

The film was made as a promotional film- common at the time. (Aretha made similar films which are currently available, including "Soul Sister," "Live at the Concertgrabouw," "Live at the Fillmore"- all made between 1968-1972 and covered by the existing contract.) (<http://teachrock.org/resources/video/embed/aretha-franklin-abc-news-closeup-1968/>) (<http://www.concertvault.com/aretha-franklin/fillmore-west-march-05-1971.html>) (<http://www.grooves-inc.com/franklin-aretha-live-1968-the-concertgebouw-amsterdam-rodeo-media-dvd-video-album-pZZa1-859540375.html>)

In 1972, Atlantic Records (record company) and Warner Severn Arts (film company) were under Warner Communications

Why the film was not released in 1972:

The pre-digital limitation to sync the film and audio caused Warners to shelve the project in 1972. Over time, and with the sale of the music company, and because of the rerelease of the assets over time, the physical assets were spread out between the film and film companies. Many assets either needed sorting or could not be found when resurrection of the project began in 2007.

Granular Timeline:

In 1967, Aretha Franklin signed a recording contract with Atlantic Records.

In 1968, Aretha Franklin was the biggest artist at Atlantic Records and renegotiated a more wide ranging "personal services contract" that triangulates Ms. Franklin, Warner Films and Atlantic Records.

(<http://alsrecordsandtapes.com/amazinglaw/wbdocs/judy%20noack%201998%20amazing%20grace.pdf>)

In January, 1972, Sydney Pollack, a film crew, musicians, choir and locations were hired (with unique documentation) by Warner Films to make "Amazing Grace."

(<http://alsrecordsandtapes.com/amazinglaw/wbdocs/amazing%20releases%20church%20choir.pdf>)

(<http://alsrecordsandtapes.com/amazinglaw/wbdocs/wb%20legal%20pollack%20payment.pdf>)

(<http://alsrecordsandtapes.com/amazinglaw/wbdocs/wb%20cinemobile%20rental.pdf>)

The co-star of the film, Reverend James Cleveland says during filming that "If you see all these cameras around, they are getting it together for Warner Brothers."

In August, 1972, the "Amazing Grace" LP was released by Atlantic Records. Ms. Franklin has approval over liner notes and art as per the 1968 Warner/Atlantic contract. The back of the album reads:

"Look for the film by Sydney Pollack."

(<http://alsrecordsandtapes.com/amazinglaw/wbdocs/amazingliner.jpg>)

In 1972, Mr. Pollack could not finish the film as the audio and film could not be put together to make a film.

([http://alsrecordsandtapes.com/amazinglaw/wbdocs/wb%20memo%20for%20lip%20sync%20\\$\\$\\$.pdf](http://alsrecordsandtapes.com/amazinglaw/wbdocs/wb%20memo%20for%20lip%20sync%20$$$.pdf))

In September, 1972, due to technical difficulties, Warner Films "wrote off" the film.

(<http://alsrecordsandtapes.com/amazinglaw/wbdocs/wb%20write%20off.pdf>)

Over the years, excerpts of the "Amazing Grace" film have been used; including but not limited to: "Atlantic 25: The History of Atlantic Records" in 1973

(<http://alsrecordsandtapes.com/amazinglaw/wbdocs/ATLANTAFILMFESTIVAL.tiff>); Aretha Franklin's

American Masters: Aretha, the Queen of Soul in 1986 (produced by Ms. Franklin

(<http://www.pbs.org/wnet/americanmasters/aretha-franklin-about-aretha-franklin/598/>). All usages are done in reliance of the 1968 agreement between Ms. Franklin, Atlantic and Warners, with Atlantic Records and Warner Films (owners and distributors of the above two films). Clips from "Amazing Grace" are used across countless media since the original release of the footage in 1973 without any further documentation.

In 2003, Time Warner sold the Warner Music Group. (From 1967 until 2003, Warner Films and Atlantic Records were under the Time Warner umbrella.)

In 2007, I gained quitclaim of all assets, including all contracts and releases for "Amazing Grace" from Warner Films. Warner Films could not locate Ms. Franklin's personal service contract. In my quitclaim, Warners asked for permission from Ms. Franklin. (<http://alsrecordsandtapes.com/amazinglaw/wbdocs/A-7,%202007%20Quitclaim%20Agreement.pdf>)

The 2011 agreement Ms. Franklin sued Mr. Elliott. Because Ms. Franklin claimed there was no contract and because we could not get access to her contract, a private settlement was reached without court jurisdiction.

In 2013, Warner Films discovered and provided (as per quitclaim) Ms. Franklin's contract to Mr. Elliott, providing proof of Ms. Franklin's legal permission to make the film.

In 2013, Warner Films discovered Ms. Franklin's contract. Warner Films affirmed that the 1968 contract fulfilled Ms. Franklin's permission. ([http://alsrecordsandtapes.com/amazinglaw/wbdocs/4-1-1968%20Aretha%20Franklin%20Recording%20Agreement%20\(Atlantic%20and%20Warner%20Bros.%20S even%20Arts\).pdf](http://alsrecordsandtapes.com/amazinglaw/wbdocs/4-1-1968%20Aretha%20Franklin%20Recording%20Agreement%20(Atlantic%20and%20Warner%20Bros.%20S even%20Arts).pdf))

After discovering the contract, Todd Musburger, attorney for Mr. Elliott, advised Arnold Reed, attorney for Ms. Franklin, that the 2011 settlement was no longer applicable as it could not be enforced due to the ongoing exploitation of the film assets by Warner Films and others (including Ms. Franklin). These film assets had, in fact, been exploited since 1972 by Warner Films, Atlantic Records and Ms. Franklin.

In April, 2015, Mr. Elliott advised Rick Levy, Ms. Franklin's agent, that Mr. Elliott would premiere the film at the Telluride Film Festival in September, 2015.

On August 20, 2015, Mr. Reed and Ms. Franklin's interview with the Detroit Free Press was published. In the article, Ms. Franklin said, "I love the film." Mr. Reed. (<http://www.freep.com/story/entertainment/music/brian-mccollum/2015/08/20/aretha-franklin-possible-injunction-amazing-grace-toronto/32078407/>) The article

[http://www.2015/09/20/aretha-franklin-possible-injunction-amazing-grace-toronto/2015/09/20/](#) The article states, two weeks before the Telluride Film Festival and three weeks prior to the Toronto Film Festival that "The film is already one of the most buzzed-about documentaries on the Toronto docket."

On September 4, 2015, Ms. Franklin received a 14 day injunction from the tenth circuit.

Continuance stipulations were entered which specifies "good faith negotiations."

The film was purchase by Lionsgate Films following the Toronto Film Festival in September, 2015.

Negotiations:

Between 2007 and the present, Mr. Elliott and his representatives have tried to negotiate with seven or more lawyers over four different law firms, five different agents across two different agencies, many different publicists/managers/friends of Ms. Franklin.

Ms. Franklin asked for 50% of film and \$1m advance but is not sharing record royalties. The film (me) does not share in record receipts (estimated by wmg as \$3-5m over five years).

After 15 consecutive months post-Telluride, 2015, on December 30, 2016, Ms. Franklin turned down \$1.125m and 50% of Mr. Elliott's shares in the film.

Errors from the hearing:

1.

- Q: "When did you become aware that this film would be shown at the Telluride Film Festival?"
- A (Ms. Franklin): A few days ago. I read about it online.

Truth: Ms. Franklin gave an interview with the Detroit Free Press two weeks prior in which they discussed the film being shown at the film festival. The headline reads: [Aretha Franklin considers legal action to halt film](#)

Further: Mr. Elliott had a meeting with Ms. Franklin's representative Rick Levy Of ICM on April 22, 2015 where Mr. Elliott informed Mr. Levy of the Telluride and Toronto Film Festivals.

Mr. Elliott's lawyer Todd Musburger negotiated with Ms. Franklin's attorney Arnold Reed over the intervening time between the Elliott/Levy meeting.

Mr. Reed, when presented with Ms. Franklin's contract by Mr. Musburger, affirmed the contract.

2.

- A (Ms. Franklin): They didn't have my approval... he was going to use my name and likeness and use my name to reap financial benefits.
- Q: You mentioned your name and likeness. Is that important to you?
- A (Ms. Franklin): Oh, absolutely. For them to show that film and to... ignore me where my name and reputation, my concern, would be terrible."

Ms. Franklin, in the Detroit Free Press interview, said, "I love the film."

3.

- Q: Do you allow people to videotape your concerts?
- A (Ms. Franklin): No, not without my approval.

In the liner notes for Ms. Franklin's "Amazing Grace" album (notes she has approval over contractually), it reads:"The recording of this album was filmed by Warner Brothers, Inc. with Sidney Pollack directing."

- warners selling the record company and not having contract
- warners/atlantic withholding the contract

4.

- In Ms. Franklin's affidavit, she claims in 3. that "The recording of "Amazing Grace" was videotaped."

There was a 16mm film crew with five cameras and an Oscar nominated director, Sydney Pollack.

While videotape is similar for film, the planning to have Mr. Pollack's, his crew, the coordinating and cooperation of Warner Films and Atlantic Records, the audio crew, the location planning, the setting up of lights, the planning and execution of contracts and setting up of obstreperous equipment of the day (1972) was a big undertaking.

5.

- In Ms. Franklin's affidavit, she claims in 5. that she "never gave permission... to any entity granting permission to use my name and likeness for commercial purposes with regards to the "Amazing Grace" film, or any film footage or audio recording..."

The audio recording of "Amazing Grace" has been the best selling Gospel album of all time since it's release by Atlantic Records in 1972, amongst many untruths about this statement.

[http://alsrecordsandtapes.com/amazinglaw/wbdocs/\[10-1\]%20Affidavit%20of%20Aretha%20Franklin%20\(01499915xA6534\).pdf](http://alsrecordsandtapes.com/amazinglaw/wbdocs/[10-1]%20Affidavit%20of%20Aretha%20Franklin%20(01499915xA6534).pdf)

6.

- In Ms. Franklin's affidavit, she claims in 8. that "In August 2015, I discovered that Mr. Elliott plans to show the film at the Toronto Film Festival. Mr. Elliott gave me no notice of his intent to show the film at the Toronto Film Festival. I found out after seeing it on the internet."
- In Ms. Franklin's affidavit, she claims in 9. that "On September 3, 2015, I discovered that Alan Elliott plans to show the film at the Telluride Film Festival"
- In Ms. Franklin's affidavit, she claims in 10. that "No representatives of the Toronto Film Festival or the Telluride Film Festival have contacted me regarding their planned showing of the film."

Mr. Elliott had a meeting with Ms. Franklin's representative Rick Levy Of ICM on April 22, 2015 where Mr. Elliott informed Mr. Levy of the Telluride and Toronto Film Festivals.

Mr. Elliott's lawyer Todd Musburger negotiated with Ms. Franklin's attorney Arnold Reed continually over the intervening time between April 22, 2015 and the day Mr. Reed was fired days before the trial. Mr. Reed, when presented with Ms. Franklin's contract by Mr. Musburger, affirmed the contract.

Ms. Franklin, in a published interview with the Detroit Free Press two weeks prior to the Telluride Film Festival, the article reads: "'Amazing Grace," which captures a star-studded gospel service headlined by Franklin in 1972, is scheduled to premiere on opening night of September's prestigious Toronto International Film Festival."

Ms. Franklin's lawyers, including Arnold Reed and David Bennett were both informed months before the festivals and Mr. Reed negotiated. Mr. Reed discussed the pending festivals in an interview with the Detroit Free Press.

[http://alsrecordsandtapes.com/amazinglaw/wbdocs/\[10-1\]%20Affidavit%20of%20Aretha%20Franklin%20\(01499915xA6534\).pdf](http://alsrecordsandtapes.com/amazinglaw/wbdocs/[10-1]%20Affidavit%20of%20Aretha%20Franklin%20(01499915xA6534).pdf)

7.

- In Ms. Franklin's affidavit, she claims in 11., that "I believe that the right as to when my concert footage should be seen publicly, and under what conditions, is a right that belongs to me. I have never given that right with respect to the 1972 concert to anyone else."

Ms. Franklin's contract is specific.

"4. All recording hereunder and all derivatives made therefrom, together with the performances embodied thereon, shall be entirely Company's property."

Artist grants to Company ... (b) the right to use and publish, and to permit others to use and publish, the Artist's name and likeness...

This is the only contract which continues, since 1968, to be relied upon by Ms. Franklin, Atlantic Records and Warner Films.

Film of this specific concert has been used and licensed countless times by Ms. Franklin, Atlantic Records and Warner Films and continues to be displayed across all media as it has since 1973, including, but not limited to:

- commercial films
- documentary films
- television
- film clips
- YouTube

Aretha Franklin's personal service contract with Warner Films and Atlantic Records:

Warner Bros. and Atlantic Records continue to rely upon Ms. Franklin's personal service contract as they have for 49 years. The personal service contract covers all aspects of Ms. Franklin's "personal services" including film, tv, videos and recordings. This contract has been used to make LPs, Cds, Digital downloads, Videos, Cassettes, DVDs and whatever other coming reproductions. Ms. Franklin's personal service contract is what Warner Films, Atlantic Records and Ms. Franklin relied upon to make the film.

Ms. Franklin was always aware since the initial filming in 1972 of Warner Films' intent to make and distribute "Amazing Grace." She has never produced any documentation showing otherwise.

Ms. Franklin's contract is specific.

"4. All recording hereunder and all derivatives made therefrom, together with the performances embodied thereon, shall be entirely Company's property."

Artist grants to Company ... (b) the right to use and publish, and to permit others to use and publish, the Artist's name and likeness...

(c) the sole and exclusive rights in, title to and ownership, including, but not limited to, the right to use and control all masters, matrices, records or other reproductions of the performances embodied in such recordings by any method, electronic, magnetic, mechanical or other, now or hereafter know, obtained from recordings made here- under the performances embodied therein;

(d) the sole and exclusive right, if Company so desires, to to permit the public performances thereof, by means of radio broadcast or otherwise;"

Why the film was never released:

The reason the film was written off by Warner Brothers was because, due to technical difficulties, the film and music could not be put in sync. (document).

Telluride:

Ms. Franklin's contract, while hard to digest in an emergency session.

Atlantic Records refused Mr. Elliott access to Ms. Franklin's contract. Warner Films produced their copy of the personal service contract in 2013 after which Mr. Elliott, with the blessing of Warner Films, moved forward to finish the film for sale.

Plainly, there are releases for everyone in the production. The amount of information in terms of releases, contracts and planning are thorough and detailed. Every musician, choir member (even POTENTIAL choir members- those who could be possible replacements) are documented and accounted for with separate releases. Every 16 track tape, every 2 track tape, every piece of film was accounted for by, at the time, the largest film and music companies. Warners and Atlantic had a success a year prior with "Woodstock" and they were intent on duplicating a "synergy" between the film and music companies and had all ready used the blueprint (and would use it again and again).

Ms. Franklin presented to the court that she had no contract. However, after years of investigation, it is indisputable that Warner Films and Atlantic Records relied upon her personal services contract to make and distribute "Amazing Grace."

Fallout:

Ms. Franklin's offense rests on Warner Films mislabeling her contract when the company digitized it's paperwork from 40 years prior.

Ms. Franklin brought nuisance suits against Mr. Elliott, bullying him into agreements through threats, when in fact she had a contract which was being used the entire time and which she continues to collect on to this day.

Ms. Franklin took advantage of Mr. Elliott's lack of access to her contract.

- Detroit Free Press (<http://www.freep.com/story/entertainment/music/brian-mccollum/2015/08/20/aretha-franklin-possible-injunction-amazing-grace-toronto/32078407/>):

"Franklin's attorney cast doubt on the validity of the 1972 contract Elliott said he has since turned up.

'The Titanic will surface before this letter surfaces,' said Reed, adding that he has advised Elliott's attorney not to proceed with the Toronto screening.

Such a contract would be irrelevant anyway, Reed said, because of the 2011 settlement agreement."

--

- every defense presented by Ms. Franklin has been done under false pretense:
 - she has a contract.
 - I would never have signed reed agreement if she had disclosed contract.
 - clearly every other thing is covered in ms franklin's contract. records, film, television.
 - wb either paid aretha the rate in the contract or considered it "promotional."
 - no responsibility to interpret what might have been negotiated- no [proof there was any intended payment.](#)
 - can't disentangle/carve out of this specific film- there is no other documents.
 - fillmore east is currently being [sold.](#)
 - abc documentary: 30 mins.: <http://teachrock.org/resources/video/embed/aretha-franklin-abc-news-closeup-1968/>
 - american masters: <http://www.pbs.org/wnet/americanmasters/aretha-franklin-about-aretha-franklin/598/>
 - bob rooyens film "live at concertgebouw" (<http://www.grooves-inc.com/franklin-aretha-live-1968-the-concertgebouw-amsterdam-rodeo-media-dvd-video-album-pZZa1-859540375.html>)(<http://www.jazzwax.com/2016/02/aretha-in-amsterdam-1968.html>)(http://www.openculture.com/2012/08/the_queen_of_soul_conquers_europe_aretha_franklin_in_amsterdam_1968.html)-12 songs... it's for sale now (<https://www.redbullet.nl/en/organisation/onset/>) (<http://www.northendhaarlem.nl/a-23574769/dvd-muziek/aretha-franklin-live-at-concertgebouw-1968-dvd/>)
 - 34 songs currently being "licensed" at reelin' in the years from the time under contract (http://reelinintheyears.com/database-search/?stage=show_results)
 - wgbh licenses (<http://reelinintheyears.com/wgbh-boston-and-reelin-in-the-years-productions-partner-to-license-music-footage/>)
- film from "Amazing Grace" is currently used- repeatedly. Countless. MTV, VH1, BET...
 - bet honors

- kennedy center honors
- photos are used from the filming.
- album liner notes- she has approval:
<http://alsrecordsandtapes.com/amazinglaw/wbdocs/amazingliner.jpg>
- no further documentation- only WB contract.
- The film was unreleased because of technical difficulties: film could not be synced with music (show memo)
- agreed with representative to a contract.
 - Lionsgate
 - Concord
- re: Telluride:
 - six months advanced notice was given to her representatives prior to Telluride. (not when Telluride announced on that friday- as Franklin claimed)
 - Franklin's lawyer, Arnold Reed, validated the WB contract with my lawyer, Todd Musburger before Reed got fired.
 - settlement language in previous and present agreement specifies "good faith negotiations."
 - interview published by detroit free press two weeks before detailing knowledge of toronto film festival. weird legal reading.
 - she has breached agreements for "good faith" both in Telluride and in prior 2011 settlement.
- detroit free press article on broken agreements:
<http://www.freep.com/story/entertainment/music/brian-mccollum/2015/08/20/aretha-franklin-possible-injunction-amazing-grace-toronto/32078407/>
- History of shadiness: <http://www.deseretnews.com/article/681118/Refusal-to-pay-debts-tarnishing-Franklins-golden-image.html>
- Plainly, the film was made under contract with the full and complete compliance of Aretha Franklin.

Assets:

Because this recording was made for both the film and record companies, there was a thorough delineation and separation of assets.

Atlantic Records had one set of the 16 track audio recordings. Because they paid for all filming, Warner Films owned the film assets of "Amazing Grace." Warner Films also had another set of 16 track audio recordings (for use with the film).

All of the planning for "Amazing Grace" required high profile professional planning. Ms. Franklin was a big star for the record company and was working with an Academy Award nominated director (Sydney Pollack) for one of the largest film companies (Warner Films).

Post-Denver/Telluride:

Court ordered "good faith negotiations."

we have offered every permutation (she can buy film, i'll await her passing... or she can have a million dollars)...

what rights does she have to block the film?

possibilities:

- telluride should tell judge they want to show the movie.
- film is always being shown. wb is my partner.
- mediation.

court mandates good faith negotiations.

court documents as

unwind "respect" from ag?

why did the judge hear the case in the first place? there was no fire!

Why did the judge hear the case in the first place? there was no mo-

mentioned toronto in article...

contract

- movie is still being shown
- hard to tug at thread
- fillmore
- precedent

fired lawyers

- arnold reed
- jonathan cantor

don wilson

respect

- she asked for

contract is there.

court documents:

For "Amazing Grace" Warner Films secured and relied upon many different contracts for each filmed cast and crew member, including the choir, the band, the church location and the film's director.

The documentation is thorough and intact.

It is equally clear that Warners and Ms. Franklin relied upon her personal service contract with Warner Films and Atlantic Records for her participation in the film.

the court ruling is too broad- the film was shown... is shown... and Elliott's partnership with warner brothers

In addition, Warner Seven Arts and Atlantic relied upon Ms. Franklin's contract on at least two occasions to distribute the film in different iterations, including "American Masters: the Queen of Soul" which Ms. Franklin produced.

In addition, Ms. Franklin's concerts from the Fillmore West are currently for sale at Wolfgang's Vault at http://www.concertvault.com/aretha-franklin/video/respect_1203725099.html.

other docs:

<http://www.wxyz.com/news/region/detroit/aretha-franklins-documents-recordings-found-by-man-in-detroit-home>

options:

- 1) she could buy the film from me.
- 2) i would not release it while she is alive if she would like to negotiate that.
- 3) go to court

thank you.

-alan

phone: 323 988 9692

peace and love.

thank you.

-alan

phone: 323 988 9692

peace and love.

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Fwd: Amazing Grace
Date: September 8, 2017 at 2:30 PM
To: Nelson Hsieh nhsieh@gpsllp.com



Begin forwarded message:

From: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Subject: Amazing Grace
Date: July 18, 2017 at 5:19:48 PM PDT
To: Chad Milton <cemilton@mediariskconsultants.com>

hello chad

thank you again for your time and consideration.

in case you have some down time and to get you the info in advance...

i will send a few emails with a lot of helpful informations.

below is the timeline and the virtual dossier can be found here:

<http://alsrecordsandtapes.com/amazinglaw/wbdocs/>

i look forward to talking with you wednesday.

thank you-

alan

here is hiscox turning down of coverage:



Amazing Grace
- Frank...OC.pdf

here is the timeline:

Amazing Grace:

Amazing Grace basic timeline:

In 1972, Warner films filmed "Amazing Grace" - a documentary film of the recording of the album of the same name. Warners hired Academy Award nominated director Sydney Pollack. The film was made with a film crew, a gospel choir and in a church. All members of the production signed releases/contracts. Ms. Franklin was under "personal service contract" with Warner films.

The release of the documentary was either to be a feature film or a television special and was intended and the film is made mention of inside the film and is included in the album's liner notes.

The movie was unable to be finished due to technical problems (syncing audio and video).

153 mins of the 20+hours of shooting were able to be put together.

Warner Films and Atlantic Records used the 153 minutes in at least two films:

"Atlantic Records 25th Anniversary" in 1973

"Aretha Frankl: Queen of Soul; American Masters" in 1986

Both films are produced by Warner films. "American Masters" was produced by Ms. Franklin and released jointly by Atlantic Records and Warner Films.

in 2007, Warner Films gave me quitclaim.

in 2010, new technology allowed for sync between the film with the audio.

[l,%202007%20Quitclaim%20Agreement.pdf](#)

The 2011 agreement Ms. Franklin sued Mr. Elliott. Because Ms. Franklin claimed there was no contract and because we could not get access to her contract, a private settlement was reached without court jurisdiction.

In 2013, Warner Films discovered and provided (as per quitclaim) Ms. Franklin's contract to Mr. Elliott, providing proof of Ms. Franklin's legal permission to make the film.

In 2013, Warner Films discovered Ms. Franklin's contract. Warner Films affirmed that the 1968 contract fulfilled Ms. Franklin's permission. ([http://alsrecordsandtapes.com/amazinglaw/wbdocs/4-1-1968%20Aretha%20Franklin%20Recording%20Agreement%20\(Atlantic%20and%20Warner%20Bros.%20S%20even%20Arts\).pdf](http://alsrecordsandtapes.com/amazinglaw/wbdocs/4-1-1968%20Aretha%20Franklin%20Recording%20Agreement%20(Atlantic%20and%20Warner%20Bros.%20S%20even%20Arts).pdf))

After discovering the contract, Todd Musburger, attorney for Mr. Elliott, advised Arnold Reed, attorney for Ms. Franklin, that the 2011 settlement was no longer applicable as it could not be enforced due to the ongoing exploitation of the film assets by Warner Films and others (including Ms. Franklin). These film assets had, in fact, been exploited since 1972 by Warner Films, Atlantic Records and Ms. Franklin.

In April, 2015, Mr. Elliott advised Rick Levy, Ms. Franklin's agent, that Mr. Elliott would premiere the film at the Telluride Film Festival in September, 2015.

On August 20, 2015, Mr. Reed and Ms. Franklin's interview with the Detroit Free Press was published. In the article, Ms. Franklin said, "I love the film." Mr. Reed. (<http://www.freep.com/story/entertainment/music/brian-mccollum/2015/08/20/aretha-franklin-possible-injunction-amazing-grace-toronto/32078407/>) The article states, two weeks before the Telluride Film Festival and three weeks prior to the Toronto Film Festival that "The film is already one of the most buzzed-about documentaries on the Toronto docket."

On September 4, 2015, Ms. Franklin received a 14 day injunction from the tenth circuit.

Continuance stipulations were entered which specifies "good faith negotiations."

The film was purchased by Lionsgate Films following the Toronto Film Festival in September, 2015.

Negotiations:

Between 2007 and the present, Mr. Elliott and his representatives have tried to negotiate with seven or more lawyers over four different law firms, five different agents across two different agencies, many different publicists/managers/friends of Ms. Franklin.

Ms. Franklin asked for 50% of film and \$1m advance but is not sharing record royalties. The film (me) does not share in record receipts (estimated by wmg as \$3-5m over five years).

After 15 consecutive months post-Telluride, 2015, on December 30, 2016, Ms. Franklin turned down \$1.125m and 50% of Mr. Elliott's shares in the film.

Errors from the hearing:

1.
 - Q: "When did you become aware that this film would be shown at the Telluride Film Festival?"
 - A (Ms. Franklin): A few days ago. I read about it online.

Truth: Ms. Franklin gave an interview with the Detroit Free Press two weeks prior in which they discussed the film being shown at the film festival. The headline reads: **Aretha Franklin considers legal action to halt film**

Further: Mr. Elliott had a meeting with Ms. Franklin's representative Rick Levy Of ICM on April 22, 2015 where Mr. Elliott informed Mr. Levy of the Telluride and Toronto Film Festivals.

Mr. Elliott's lawyer Todd Musburger negotiated with Ms. Franklin's attorney Arnold Reed over the intervening time between the Elliott/Levy meeting.

Mr. Reed, when presented with Ms. Franklin's contract by Mr. Musburger, affirmed the contract.

2.

- A (Ms. Franklin): They didn't have my approval... he was going to use my name and likeness and use my name to reap financial benefits.
- Q: You mentioned your name and likeness. Is that important to you?
- A (Ms. Franklin): Oh, absolutely. For them to show that film and to... ignore me where my name and reputation, my concern, would be terrible."

Ms. Franklin, in the Detroit Free Press interview, said, "I love the film."

3.

- Q: Do you allow people to videotape your concerts?
- A (Ms. Franklin): No, not without my approval.

In the liner notes for Ms. Franklin's "Amazing Grace" album (notes she has approval over contractually), it reads: "The recording of this album was filmed by Warner Brothers, Inc. with Sidney Pollack directing."

- warners selling the record company and not having contract
- warners/atlantic withholding the contract

4.

- In Ms. Franklin's affidavit, she claims in 3. that "The recording of "Amazing Grace" was videotaped."

There was a 16mm film crew with five cameras and an Oscar nominated director, Sydney Pollack.

While videotape is similar for film, the planning to have Mr. Pollack's, his crew, the coordinating and cooperation of Warner Films and Atlantic Records, the audio crew, the location planning, the setting up of lights, the planning and execution of contracts and setting up of obstreperous equipment of the day (1972) was a big undertaking.

5.

- In Ms. Franklin's affidavit, she claims in 5. that she "never gave permission... to any entity granting permission to use my name and likeness for commercial purposes with regards to the "Amazing Grace" film, or any film footage or audio recording..."

The audio recording of "Amazing Grace" has been the best selling Gospel album of all time since its release by Atlantic Records in 1972, amongst many untruths about this statement.

[http://alsrecordsandtapes.com/amazinglaw/wbdocs/\[10-1\]-%20Affidavit%20of%20Aretha%20Franklin%20\(01499915xA6534\).pdf](http://alsrecordsandtapes.com/amazinglaw/wbdocs/[10-1]-%20Affidavit%20of%20Aretha%20Franklin%20(01499915xA6534).pdf)

6.

- In Ms. Franklin's affidavit, she claims in 8. that "In August 2015, I discovered that Mr. Elliott plans to show the film at the Toronto Film Festival. Mr. Elliott gave me no notice of his intent to show the film at the Toronto Film Festival. I found out after seeing it on the internet."
- In Ms. Franklin's affidavit, she claims in 9. that "On September 3, 2015, I discovered that Alan Elliott plans to show the film at the Telluride Film Festival"
- In Ms. Franklin's affidavit, she claims in 10. that "No representatives of the Toronto Film Festival or the Telluride Film Festival have contacted me regarding their planned showing of the film."

Mr. Elliott had a meeting with Ms. Franklin's representative Rick Levy Of ICM on April 22, 2015 where Mr.

Elliott informed Mr. Levy of the Telluride and Toronto Film Festivals.

Mr. Elliott's lawyer Todd Musburger negotiated with Ms. Franklin's attorney Arnold Reed continually over the intervening time between April 22, 2015 and the day Mr. Reed was fired days before the trial. Mr. Reed, when presented with Ms. Franklin's contract by Mr. Musburger, affirmed the contract.

Ms. Franklin, in a published interview with the Detroit Free Press two weeks prior to the Telluride Film Festival, the article reads: "'Amazing Grace,' which captures a star-studded gospel service headlined by Franklin in 1972, is scheduled to premiere on opening night of September's prestigious Toronto International Film Festival."

Ms. Franklin's lawyers, including Arnold Reed and David Bennett were both informed months before the festivals and Mr. Reed negotiated. Mr. Reed discussed the pending festivals in an interview with the Detroit Free Press.

[http://alsrecordsandtapes.com/amazinglaw/wbdocs/\[10-1\]%20Affidavit%20of%20Aretha%20Franklin%20\(01499915xA6534\).pdf](http://alsrecordsandtapes.com/amazinglaw/wbdocs/[10-1]%20Affidavit%20of%20Aretha%20Franklin%20(01499915xA6534).pdf)

7.

- In Ms. Franklin's affidavit, she claims in 11., that "I believe that the right as to when my concert footage should be seen publicly, and under what conditions, is a right that belongs to me. I have never given that right with respect to the 1972 concert to anyone else."

Ms. Franklin's contract is specific.

"4. All recording hereunder and all derivatives made therefrom, together with the performances embodied thereon, shall be entirely Company's property.

Artist grants to Company ...(b) the right to use and publish, and to permit others to use and publish, the Artist's name and likeness...

This is the only contract which continues, since 1968, to be relied upon by Ms. Franklin, Atlantic Records and Warner Films.

Film of this specific concert has been used and licensed countless times by Ms. Franklin, Atlantic Records and Warner Films and continues to be displayed across all media as it has since 1973, including, but not limited to:

- commercial films
- documentary films
- television
- film clips
- YouTube

Aretha Franklin's personal service contract with Warner Films and Atlantic Records:

Warner Bros. and Atlantic Records continue to rely upon Ms. Franklin's personal service contract as they have for 49 years. The personal service contract covers all aspects of Ms. Franklin's "personal services" including film, tv, videos and recordings. This contract has been used to make LPs, Cds, Digital downloads, Videos, Cassettes, DVDs and whatever other coming reproductions. Ms. Franklin's personal service contract is what Warner Films, Atlantic Records and Ms. Franklin relied upon to make the film.

Ms. Franklin was always aware since the initial filming in 1972 of Warner Films' intent to make and distribute "Amazing Grace." She has never produced any documentation showing otherwise.

Ms. Franklin's contract is specific.

"4. All recording hereunder and all derivatives made therefrom, together with the performances embodied thereon, shall be entirely Company's property.

Artist grants to Company ... (b) the right to use and publish, and to permit others to use and publish, the Artist's name and likeness...

(c) the sole and exclusive rights in, title to and ownership, including, but not limited to, the right to use and control all masters, matrices, records or other reproductions of the performances embodied in such recordings by any method, electronic, magnetic, mechanical or other, now or hereafter know, obtained from recordings made here- under the performances embodied therein;

(d) the sole and exclusive right, if Company so desires, to to permit the public performances thereof, by means of radio broadcast or otherwise;"

Why the film was never released:

The reason the film was written off by Warner Brothers was because, due to technical difficulties, the film and music could not be put in sync. (document).

Telluride:

Ms. Franklin's contract, while hard to digest in an emergency session.

Atlantic Records refused Mr. Elliott access to Ms. Franklin's contract. Warner Films produced their copy of the personal service contract in 2013 after which Mr. Elliott, with the blessing of Warner Films, moved forward to finish the film for sale.

Plainly, there are releases for everyone in the production. The amount of information in terms of releases, contracts and planning are thorough and detailed. Every musician, choir member (even POTENTIAL choir members- those who could be possible replacements) are documented and accounted for with separate releases. Every 16 track tape, every 2 track tape, every piece of film was accounted for by, at the time, the largest film and music companies. Warners and Atlantic had a success a year prior with "Woodstock" and they were intent on duplicating a "synergy" between the film and music companies and had all ready used the blueprint (and would use it again and again).

Ms. Franklin presented to the court that she had no contract. However, after years of investigation, it is indisputable that Warner Films and Atlantic Records relied upon her personal services contract to make and distribute "Amazing Grace."

Fallout:

Ms. Franklin's offense rests on Warner Films mislabeling her contract when the company digitized it's paperwork from 40 years prior.

Ms. Franklin brought nuisance suits against Mr. Elliott, bullying him into agreements through threats, when in fact she had a contract which was being used the entire time and which she continues to collect on to this day.

Ms. Franklin took advantage of Mr. Elliott's lack of access to her contract.

- Detroit Free Press (<http://www.freep.com/story/entertainment/music/brian-mccollum/2015/08/20/aretha-franklin-possible-injunction-amazing-grace-toronto/32078407/>):

"Franklin's attorney cast doubt on the validity of the 1972 contract Elliott said he has since turned up.

'The Titanic will surface before this letter surfaces,' said Reed, adding that he has advised Elliott's attorney not to proceed with the Toronto screening.

Such a contract would be irrelevant anyway, Reed said, because of the 2011 settlement agreement."

--

- every defense presented by Ms. Franklin has been done under false pretense:
 - she has a contract.

- I would never have signed reed agreement if she had disclosed contract.
- clearly every other thing is covered in ms franklin's contract. records, film, television.
- wb either paid aretha the rate in the contract or considered it "promotional."
- no responsibility to interpret what might have been negotiated- no [proof there was any intended payment.](#)
- can't disentangle/carve out of this specific film- there is no other documents.
- fillmore east is currently being [sold.](#)
- abc documentary: 30 mins.: <http://teachrock.org/resources/video/embed/aretha-franklin-abc-news-closeup-1968/>
- american masters: <http://www.pbs.org/wnet/americanmasters/aretha-franklin-about-aretha-franklin/598/>
- bob rooyens film "live at concertgebouw" (<http://www.grooves-inc.com/franklin-aretha-live-1968-the-concertgebouw-amsterdam-rodeo-media-dvd-video-album-pZZa1-859540375.html>)(<http://www.jazzwax.com/2016/02/aretha-in-amsterdam-1968.html>) (http://www.openculture.com/2012/08/the_queen_of_soul_conquers_europe_aretha_franklin_in_amsterdam_1968.html)-12 songs... it's for sale now (<https://www.redbullet.nl/en/organisation/onset/>) (<http://www.northendhaarlem.nl/a-23574769/dvd-muziek/aretha-franklin-live-at-concertgebouw-1968-dvd/>)
- 34 songs currently being "licensed" at reelin' in the years from the time under contract (http://reelinintheyears.com/database-search/?stage=show_results)
- wgbh licenses (<http://reelinintheyears.com/wgbh-boston-and-reelin-in-the-years-productions-partner-to-license-music-footage/>)
- film from "Amazing Grace" is currently used- repeatedly. Countless. MTV, VH1, BET...
 - bet honors
 - kennedy center honors
 - photos are used from the filming.
 - album liner notes- she has approval: <http://alsrecordsandtapes.com/amazinglaw/wbdocs/amazingliner.jpg>
- no further documentation- only WB contract.
- The film was unreleased because of technical difficulties: film could not be synced with music (show memo)
- agreed with representative to a contract.
 - Lionsgate
 - Concord
- re: Telluride:
 - six months advanced notice was given to her representatives prior to Telluride. (not when Telluride announced on that friday- as Franklin claimed)
 - Franklin's lawyer, Arnold Reed, validated the WB contract with my lawyer, Todd Musburger before Reed got fired.
 - settlement language in previous and present agreement specifies "good faith negotiations."
 - interview published by detroit free press two weeks before detailing knowledge of toronto film festival. weird legal reading.
 - she has breached agreements for "good faith" both in Telluride and in prior 2011 settlement.
- detroit free press article on broken agreements: <http://www.freep.com/story/entertainment/music/brian-mccollum/2015/08/20/aretha-franklin-possible-injunction-amazing-grace-toronto/32078407/>
- History of shadiness: <http://www.deseretnews.com/article/681118/Refusal-to-pay-debts-tarnishing-Franklins-golden-image.html>
- Plainly, the film was made under contract with the full and complete compliance of Aretha Franklin.

Assets:

Because this recording was made for both the film and record companies, there was a thorough delineation and separation of assets.

Atlantic Records had one set of the 16 track audio recordings. Because they paid for all filming, Warner Films owned the film assets of "Amazing Grace." Warner Films also had another set of 16 track audio recordings (for use with the film).

All of the planning for "Amazing Grace" required high profile professional planning. Ms. Franklin was a big star for the record company and was working with an Academy Award nominated director (Sydney Pollack)

for one of the largest film companies (Warner Films).

Post-Denver/Telluride:

Court ordered “good faith negotiations.”

we have offered every permutation (she can buy film, i'll await her passing... or she can have a million dollars)...

what rights does she have to block the film?

possibilities:

- telluride should tell judge they want to show the movie.
- film is always being shown. wb is my partner.
- mediation.

court mandates good faith negotiations.

court documents as

unwind “respect” from ag?

why did the judge hear the case in the first place? there was no fire!

mentioned toronto in article...

contract

- movie is still being shown
- hard to tug at thread
- fillmore
- precedent

fired lawyers

- arnold reed
- jonathan cantor

don wilson

respect

- she asked for

contract is there.

court documents:

For “Amazing Grace” Warner Films secured and relied upon many different contracts for each filmed cast and crew member, including the choir, the band, the church location and the film’s director.

The documentation is thorough and intact.

It is equally clear that Warners and Ms. Franklin relied upon her personal service contract with Warner Films and Atlantic Records for her participation in the film.

the court ruling is too broad- the film was shown... is shown... and Elliott’s partnership with warner brothers

[In addition, Warner Bros. and Atlantic called upon Ms. Franklin's contract as at least two separate to](#)

In addition, Warner Seven Arts and Atlantic relied upon Ms. Franklin's contract on at least two occasions to distribute the film in different iterations, including "American Masters: the Queen of Soul" which Ms. Franklin produced.

In addition, Ms. Franklin's concerts from the Fillmore West are currently for sale at Wolfgang's Vault at http://www.concertvault.com/aretha-franklin/video/respect_1203725099.html.

other docs:

<http://www.wxyz.com/news/region/detroit/aretha-franklins-documents-recordings-found-by-man-in-detroit-home>

options:

- 1) she could buy the film from me.
- 2) i would not release it while she is alive if she would like to negotiate that.
- 3) go to court

thank you.

-alan

phone: 323 988 9692

peace and love.

From: Alan Elliott alanelliott@concordbicycle.com 
Subject: Fwd: Amazing Grace
Date: August 15, 2017 at 10:31 AM
To: George Short GShort@BHFS.com

AE

Begin forwarded message:

From: alan elliott (ucla) <alanelliott@g.ucla.edu>
Date: July 25, 2017 at 12:47:37 PM PDT
To: seth lichtenstein <sl@hlymedialaw.com>
Subject: Amazing Grace

since you asked... and... thank you again for your time and consideration.

below is the most recent back and forths re: insurance and below that is the timeline and the virtual dossier can be found here:

<http://alsrecordsandtapes.com/amazinglaw/wbdocs/>

the letter from the attorney in denver to aretha (which has not been sent- and will not be sent until insurance is straight) is here:



Elliott-Franklin -
ltr to N...).docx

thank you-

alan

here is hiscox turning down of coverage:



Amazing Grace
- Frank...OC.pdf

—
this was follow letter sent to my insurance broker laura comerford, who forwarded to hiscox:

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 this discussion, we specifically reviewed the 2011 lawsuit and the 2013 contract with both Hiscox (Ted Gerdes) and AON when considering how to answer the question. The answer was discussed and deliberated with Hiscox through Joanne Richardson, with Hiscox's counsel Ted Gerdes and with AON's Stephen Carroll and Annette Shavuo.

Because of the 2013 discover of the personal service contract, AON/Hiscox vetted the contract and when the question came up- EVERYONE was aware of the prior issues and that they were satisfied that solidity of the personal service contract and that 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.

Hiscox directed me to discuss these matters with Ted Gerdes, I specifically told Mr. Gerdes about the 2011 lawsuit, provided him with links in emails to the lawsuit and this lawsuit was THE SINGULAR FUNDAMENTAL upon which every conversation with Hiscox was based. Insurance would allow me to defend and enforce Ms. Franklin's contract which was recently discovered (in 2013) by Warner Films.

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. In fact, the pdf of the "cease and desist" settlement that resulted from the 2011 lawsuit was provided to all parties as part of the application and is included in multiple emails.

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 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.

Most importantly though, 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 outrightly consider the question- and it is disingenuous for Hiscox to claim otherwise.

Thank you.

this is the letter stating further declination from hiscox:



Hiscox_Amazing
Grace...7).PDF

at the heart of declination is this:

the question which i SPECIFICALLY went over (post having the contract) with ted gerdes (counsel for hiscox) is #27:

"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?"

YES, in the past, aretha franklin could say that there was no contract- which is her counsel's basis- that there is no contract... however, we (hiscox and i) carefully agreed (and they were shown all docs i had) that the 1968 contract is what wb relied upon.

ted gerdes and i CAREFULLY discussed this as- POST CONTRACT- the answer should on the application woujld be "NO"- which is what i filled out.

hiscox' joanne richardson wrote:

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 aware of the contract attached and that the insured is relying on this contract/document to make this film. We have vetted it's 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 exclusion that apply regardless and we could never confirm or deny any coverage in advance as each and every claims sencerio 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 tile 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,
Joann

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



amazing grace
App- R...03.doc

below is my correspondence with ted gerdes:

Begin forwarded message:

From: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Subject: Re: Amazing Grace
Date: June 5, 2015 at 3:33:24 PM PDT
To: Ted Gerdes <ted@gerdeslaw.com>

hi ted

answers below:

thank you.

ophone: 323 988 9697

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.

On Jun 5, 2015, at 2:55 PM, Ted Gerdes <ted@gerdeslaw.com> wrote:

Alan:

I watched some of the film which was helpful to put this in perspective. It is a classic. Thanks for all of the documents and links. I have a couple of questions.

1. The Amendment to your Quitclaim Agreement requires delivery of the edited version of the film to WB by 12-31-12. Was that done and did they accept it?

yes.

If not you need another amendment as the rights have reverted back to WB.

2. There is discussion in some of the memos that the Choir may be due SAG fees for the film. What is the status of that? Are you paying them?

I have had the surviving members to screenings and plan on paying them on accordance with sag/AFTRA when I get funded.

Has there been some type of waiver?

sag/AFTRA said we could deal with it a when the time comes (they were very nice and understood the situation).

Regards,

Ted

PRIVILEGED AND CONFIDENTIAL INFORMATION: This e-mail and any attachments may contain information that is legally privileged and confidential. The information is only intended for the recipient(s) named above. If you have received this e-mail in error, please notify the sender and delete all copies without reading, printing, or saving in any manner. Any review, reliance, distribution, disclosure, or forwarding without express permission is strictly prohibited.

On Jun 4, 2015, at 6:09 PM, alan elliott (ucla) <alanelliott@g.ucla.edu> wrote:

hi ted

after we spoke, i went to your site... ! zen and the art of law/songwriting... well... we can have a good conversation about that someday soon i hope (my songwriting class has it's... zen principals...)

below are the specifics from your questions.

thank you.

-alan

phone: **323 988 9692**

This email 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.

On Jun 4, 2015, at 2:12 PM, Ted Gerdes <ted@gerdeslaw.com> wrote:

Alan:

Great speaking to you. It sounds like finishing this film was a ton of work.

Please send me the following:

1. Links to the YouTube videos of the 1973 and 1986 use of the footage.

wb films AND Atlantic records separately used the footage that they could sync on two different occasions in DVDs they released.

("aretha franklin, queen of soul: american masters": available now at:

<http://www.tower.com/queen-soul-aretha-franklin-vhs/wapi/106077119>

"atlantic's 25th anniversary"[winner of a prize at the atlanta film festival in 1973!]).

<F819A5CE-6206-48F9-A115-F8736256F15E.tiff>

footage of the film is here:

<https://www.youtube.com/watch?v=8HUjEYh32Vc>

wb has all ready publicly displayed the usable parts they had (albeit in an abbreviated version as pollack et co. could only sync 153 mins of the 20+ hours of film).

2. The electronic document file received from WB with the releases, director's agreement etc.

the larger file is here:

<http://alsrecordsandtapes.com/amazinglaw/wbdocs/>

the releases for the choir and church are here:

<http://alsrecordsandtapes.com/amazinglaw/wbdocs/amazing%20releases%20church%20choir.pdf>

sydney pollack's is here:

<http://alsrecordsandtapes.com/amazinglaw/wbdocs/wb%20legal%20pollack%20payment.pdf>

3. A copy of the liner notes from the album referencing this film.

<IMG_7722.JPG>

4. A copy of Donaldson's letter.

<http://alsrecordsandtapes.com/amazinglaw/wbdocs/donaldson.aretha.letter002.pdf>

"ms. franklin has no viable copyright claim and no viable claim involving any of her personal rights such as the right to privacy, false light, defamation or the right of publicity." -michael donaldson

5. A link to the film.

here's the link for the film:

<https://vimeo.com/91847063>

password: sp

—

the trailer can be seen here:

<https://vimeo.com/75871364>

password: trailer

6. Anything else you think might be helpful.

a few things:

ALAN ELLIOTT/WB TIMELINE:

2007 quitclaim from wb in- asks for aretha permission

2011 amendment

2013- aretha's contract given to me by steve spira

https://www.law.cornell.edu/nyctap/102_0118.htm

andrew bart, who successfully had the greenfield vs. spector:

greenfield vs. spector is, "controlling binding precedent in new york state and has been cited 100s of times as property law and absolute title across the country."

andy can be reached at:

"Andrew H. Bart" <abart@jenner.com>

i am NOT paying him... but if hiscox wishes to consult (and pay!)... he's there and ready!

i have a letter (which we can make an affidavit if necessary) from joe boyd.

<http://alsrecordsandtapes.com/amazinglaw/wbdocs/joe%20boyd%20letter.pdf>

joe's job was to get the releases for filming. he is also the highest ranking wb executive alive from when the film was shot- he was director of music services for wb films.

Wb in documents, refer to the album repeatedly as the "soundtrack album."

as discussed, the release for those entering the building (the general "notice: this recording session is being covered by motion picture cameras...")

<http://alsrecordsandtapes.com/amazinglaw/wbdocs/amazing%20releases%20church%20choir.pdf>

Ted

<image.jpg>

PRIVILEGED AND CONFIDENTIAL INFORMATION: This e-mail and any attachments may contain information that is legally privileged and confidential. The information is only intended for the recipient(s) named above. If you have received this e-mail in error, please notify the sender and delete all copies without reading, printing, or saving in any manner. Any review, reliance, distribution, disclosure, or forwarding without express permission is strictly prohibited.

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Subject: FW: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post
Date: July 22, 2015 at 12:32:48 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Cc: Stephen Carroll <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

Before you print, think about the ENVIRONMENT 🌱

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.



Binder - EO -
15-18...ce.pdf



App- REVISED
Q#22 -...03.doc

==

here is the timeline:

Amazing Grace:

Amazing Grace basic timeline:

In 1972, Warner films filmed "Amazing Grace"- a documentary film of the recording of the album of the same name. Warners hired Academy Award nominated director Sydney Pollack. The film was made with a film crew, a gospel choir and in a church. All members of the production signed releases/contracts. Ms. Franklin was under "personal service contract" with Warner films.

The release of the documentary was either to be a feature film or a television special and was intended and the film is made mention of inside the film and is included in the album's liner notes.

The movie was unable to be finished due to technical problems (syncing audio and video).

153 mins of the 20+hours of shooting were able to be put together.

Warner Films and Atlantic Records used the 153 minutes in at least two films:
"Atlantic Records 25th Anniversary" in 1973
"Aretha Frankl: Queen of Soul; American Masters" in 1986

Both films are produced by Warner films. "American Masters" was produced by Ms. Franklin and released jointly by Atlantic Records and Warner Films.

in 2007, Warner Films gave me quitclaim.

in 2010, new technology allowed for sync between the film with the audio.

Major points:

The film was made as a promotional film- common at the time. (Aretha made similar films which are currently available, including "Soul Sister," "Live at the Concertgebouw," "Live at the Filmore"- all made between 1968-1972 and covered by the existing contract.) (<http://teachrock.org/resources/video/embed/aretha-franklin-abc-news-closeup-1968/>) (<http://www.concertvault.com/aretha-franklin/filmore-west-march-05-1971.html>) (<http://www.grooves-inc.com/franklin-aretha-live-1968-the-concertgebouw-amsterdam-rodeo-media-dvd-video-album-pZa1-859540375.html>)

In 1972, Atlantic Records (record company) and Warner Severn Arts (film company) were under Warner Communications

Why the film was not released in 1972:

The pre-digital limitation to sync the film and audio caused Warners to shelve the project in 1972. Over time, and with the sale of the music company, and because of the rerelease of the assets over time, the physical assets were spread out between the film and film companies. Many assets either needed sorting or could not be found when resurrection of the project began in 2007.

Granular Timeline:

In 1967, Aretha Franklin signed a recording contract with Atlantic Records.

In 1968, Aretha Franklin was the biggest artist at Atlantic Records and renegotiated a more wide ranging "personal services contract" that triangulates Ms. Franklin, Warner Films and Atlantic Records. (<http://alsrecordsandtapes.com/amazinglaw/wbdocs/judy%20noack%201998%20amazing%20grace.pdf>)

In January, 1972, Sydney Pollack, a film crew, musicians, choir and locations were hired (with unique documentation) by Warner Films to make "Amazing Grace." (<http://alsrecordsandtapes.com/amazinglaw/wbdocs/amazing%20releases%20church%20choir.pdf>) (<http://alsrecordsandtapes.com/amazinglaw/wbdocs/wb%20legal%20pollack%20payment.pdf>) (<http://alsrecordsandtapes.com/amazinglaw/wbdocs/wb%20cinemobile%20rental.pdf>)

The co-star of the film, Reverend James Cleveland says during filming that "If you see all these cameras around, they are getting it together for Warner Brothers."

In August, 1972, the "Amazing Grace" LP was released by Atlantic Records. Ms. Franklin has approval over liner notes and art as per the 1968 Warner/Atlantic contract. The back of the album reads:

"Look for the film by Sydney Pollack." (<http://alsrecordsandtapes.com/amazinglaw/wbdocs/amazingliner.jpg>)

In 1972, Mr. Pollack could not finish the film as the audio and film could not be put together to make a film. ([http://alsrecordsandtapes.com/amazinglaw/wbdocs/wb%20memo%20for%20lip%20sync%20\\$.pdf](http://alsrecordsandtapes.com/amazinglaw/wbdocs/wb%20memo%20for%20lip%20sync%20$.pdf))

In September, 1972, due to technical difficulties, Warner Films "wrote off" the film. (<http://alsrecordsandtapes.com/amazinglaw/wbdocs/wb%20write%20off.pdf>)

Over the years, excerpts of the "Amazing Grace" film have been used; including but not limited to: "Atlantic 25: The History of Atlantic Records" in 1973 (<http://alsrecordsandtapes.com/amazinglaw/wbdocs/ATLANTAFILMFESTIVAL.tiff>); Aretha Franklin's American Masters: Aretha, the Queen of Soul in 1986 (produced by Ms. Franklin (<http://www.pbs.org/wnet/americanmasters/aretha-franklin-about-aretha-franklin/598>)). All usages are done in reliance of the 1968 agreement between Ms. Franklin, Atlantic and Warners, with Atlantic Records and Warner Films (owners and distributors of the above two films). Clips from "Amazing Grace" are used across countless media since the original release of the footage in 1973 without any further documentation.

In 2003, Time Warner sold the Warner Music Group. (From 1967 until 2003, Warner Films and Atlantic Records were under the Time Warner umbrella.)

In 2007, I gained quitclaim of all assets, including all contracts and releases for "Amazing Grace" from Warner Films. Warner Films could not locate Ms. Franklin's personal service contract. In my quitclaim, Warners asked for permission from Ms. Franklin. (<http://alsrecordsandtapes.com/amazinglaw/wbdocs/A-7.%202007%20Quitclaim%20Agreement.pdf>)

The 2011 agreement Ms. Franklin sued Mr. Elliott. Because Ms. Franklin claimed there was no contract and because we could not get access to her contract, a private settlement was reached without court jurisdiction.

In 2013, Warner Films discovered and provided (as per quitclaim) Ms. Franklin's contract to Mr. Elliott, providing proof of Ms. Franklin's legal permission to make the film.

In 2013, Warner Films discovered Ms. Franklin's contract. Warner Films affirmed that the 1968 contract fulfilled Ms. Franklin's permission. (<http://alsrecordsandtapes.com/amazinglaw/wbdocs/4-1-1968%20Aretha%20Franklin%20Recording%20Agreement%20Atlantic%20and%20Warner%20Bros.%20Seven%20Arts.pdf>)

After discovering the contract, Todd Musburger, attorney for Mr. Elliott, advised Arnold Reed, attorney for Ms. Franklin, that the 2011 settlement was no longer applicable as it could not be enforced due to the ongoing exploitation of the film assets by Warner Films and others (including Ms. Franklin). These film assets had, in fact, been exploited since 1972 by Warner Films, Atlantic Records and Ms. Franklin.

In April, 2015, Mr. Elliott advised Rick Levy, Ms. Franklin's agent, that Mr. Elliott would premiere the film at the Telluride Film Festival in September, 2015.

On August 20, 2015, Mr. Reed and Ms. Franklin's interview with the Detroit Free Press was published. In the article, Ms. Franklin said, "I love the film." Mr. Reed. (<http://www.freep.com/story/entertainment/music/brian-mccollum/2015/08/20/aretha-franklin-possible-injunction-amazing-grace-toronto/32078407/>) The article states, two weeks before the Telluride Film Festival and three weeks prior to the Toronto Film Festival that "The film is already one of the most buzzed-about documentaries on the Toronto docket."

On September 4, 2015, Ms. Franklin received a 14 day injunction from the tenth circuit.

Continuance stipulations were entered which specifies "good faith negotiations."

The film was purchase by Lionsgate Films following the Toronto Film Festival in September, 2015.

Negotiations:

Between 2007 and the present, Mr. Elliott and his representatives have tried to negotiate with seven or more lawyers over four different law firms, five different agents across two different agencies, many different publicists/managers/friends of Ms. Franklin.

Ms. Franklin asked for 50% of film and \$1m advance but is not sharing record royalties. The film (me) does not share in record receipts (estimated by wmg as \$3-5m over five years).

After 15 consecutive months post-Telluride, 2015, on December 30, 2016, Ms. Franklin turned down \$1.125m and 50% of Mr. Elliott's shares in the film.

Errors from the hearing:

1.

- Q: "When did you become aware that this film would be shown at the Telluride Film Festival?"
- A (Ms. Franklin): A few days ago. I read about it online.

Truth: Ms. Franklin gave an interview with the Detroit Free Press two weeks prior in which they discussed the film being shown at the film festival. The headline reads: [Aretha Franklin considers legal action to halt film](#)

Further: Mr. Elliott had a meeting with Ms. Franklin's representative Rick Levy Of ICM on April 22, 2015 where Mr. Elliott informed Mr. Levy of the Telluride and Toronto Film Festivals.

Mr. Elliott's lawyer Todd Musburger negotiated with Ms. Franklin's attorney Arnold Reed over the intervening time between the Elliott/Levy meeting.

Mr. Reed, when presented with Ms. Franklin's contract by Mr. Musburger, affirmed the contract.

2.

- A (Ms. Franklin): They didn't have my approval... he was going to use my name and likeness and use my name to reap financial benefits.
- Q: You mentioned your name and likeness. Is that important to you?
- A (Ms. Franklin): Oh, absolutely. For them to show that film and to... ignore me where my name and reputation, my concern, would be terrible."

Ms. Franklin, in the Detroit Free Press interview, said, "I love the film."

3.

- Q: Do you allow people to videotape your concerts?
- A (Ms. Franklin): No, not without my approval.

In the liner notes for Ms. Franklin's "Amazing Grace" album (notes she has approval over contractually) it reads: "The recording of this album was filmed by

In the liner notes for Ms. Franklin's "Amazing Grace" album (notes she has approval over contractually), it reads: "The recording of this album was financed by Warner Brothers, Inc. with Sidney Pollack directing."

- warners selling the record company and not having contract
- warners/atlantic withholding the contract

4.

- In Ms. Franklin's affidavit, she claims in 3. that "The recording of "Amazing Grace" was videotaped."

There was a 16mm film crew with five cameras and an Oscar nominated director, Sydney Pollack.

While videotape is similar for film, the planning to have Mr. Pollack's, his crew, the coordinating and cooperation of Warner Films and Atlantic Records, the audio crew, the location planning, the setting up of lights, the planning and execution of contracts and setting up of obstreperous equipment of the day (1972) was a big undertaking.

5.

- In Ms. Franklin's affidavit, she claims in 5. that she "never gave permission... to any entity granting permission to use my name and likeness for commercial purposes with regards to the "Amazing Grace" film, or any film footage or audio recording..."

The audio recording of "Amazing Grace" has been the best selling Gospel album of all time since it's release by Atlantic Records in 1972, amongst many untruths about this statement.

[http://alsrecordsandtapes.com/amazinglaw/wbdocs/\[10-1\]%20Affidavit%20of%20Aretha%20Franklin%20\(01499915xA6534\).pdf](http://alsrecordsandtapes.com/amazinglaw/wbdocs/[10-1]%20Affidavit%20of%20Aretha%20Franklin%20(01499915xA6534).pdf)

6.

- In Ms. Franklin's affidavit, she claims in 8. that "In August 2015, I discovered that Mr. Elliott plans to show the film at the Toronto Film Festival. Mr. Elliott gave me no notice of his intent to show the film at the Toronto Film Festival. I found out after seeing it on the internet."
- In Ms. Franklin's affidavit, she claims in 9. that "On September 3, 2015, I discovered that Alan Elliott plans to show the film at the Telluride Film Festival"
- In Ms. Franklin's affidavit, she claims in 10. that "No representatives of the Toronto Film Festival or the Telluride Film Festival have contacted me regarding their planned showing of the film."

Mr. Elliott had a meeting with Ms. Franklin's representative Rick Levy Of ICM on April 22, 2015 where Mr. Elliott informed Mr. Levy of the Telluride and Toronto Film Festivals.

Mr. Elliott's lawyer Todd Musburger negotiated with Ms. Franklin's attorney Arnold Reed continually over the intervening time between April 22, 2015 and the day Mr. Reed was fired days before the trial. Mr. Reed, when presented with Ms. Franklin's contract by Mr. Musburger, affirmed the contract.

Ms. Franklin, in a published interview with the Detroit Free Press two weeks prior to the Telluride Film Festival, the article reads: "'Amazing Grace," which captures a star-studded gospel service headlined by Franklin in 1972, is scheduled to premiere on opening night of September's prestigious Toronto International Film Festival."

Ms. Franklin's lawyers, including Arnold Reed and David Bennett were both informed months before the festivals and Mr. Reed negotiated. Mr. Reed discussed the pending festivals in an interview with the Detroit Free Press.

[http://alsrecordsandtapes.com/amazinglaw/wbdocs/\[10-1\]%20Affidavit%20of%20Aretha%20Franklin%20\(01499915xA6534\).pdf](http://alsrecordsandtapes.com/amazinglaw/wbdocs/[10-1]%20Affidavit%20of%20Aretha%20Franklin%20(01499915xA6534).pdf)

7.

- In Ms. Franklin's affidavit, she claims in 11., that "I believe that the right as to when my concert footage should be seen publicly, and under what conditions, is a right that belongs to me. I have never given that right with respect to the 1972 concert to anyone else."

Ms. Franklin's contract is specific.

"4. **All recording hereunder and all derivatives made therefrom, together with the performances embodied thereon, shall be entirely Company's property.**

Artist grants to Company ... (b) the right to use and publish, and to permit others to use and publish, the Artist's name and likeness...

This is the only contract which continues, since 1968, to be relied upon by Ms. Franklin, Atlantic Records and Warner Films.

Film of this specific concert has been used and licensed countless times by Ms. Franklin, Atlantic Records and Warner Films and continues to be displayed across all media as it has since 1973, including, but not limited to:

- commercial films
- documentary films
- television
- film clips
- YouTube

Aretha Franklin's personal service contract with Warner Films and Atlantic Records:

Warner Bros. and Atlantic Records continue to rely upon Ms. Franklin's personal service contract as they have for 49 years. The personal service contract covers all aspects of Ms. Franklin's "personal services" including film, tv, videos and recordings. This contract has been used to make LPs, Cds, Digital downloads, Videos, Cassettes, DVDs and whatever other coming reproductions. Ms. Franklin's personal service contract is what Warner Films, Atlantic Records and Ms. Franklin relied upon to make the film.

Ms. Franklin was always aware since the initial filming in 1972 of Warner Films' intent to make and distribute "Amazing Grace." She has never produced any documentation showing otherwise.

Ms. Franklin's contract is specific.

"4. **All recording hereunder and all derivatives made therefrom, together with the performances embodied thereon, shall be entirely Company's property.**

Artist grants to Company ... (b) the right to use and publish, and to permit others to use and publish, the Artist's name and likeness...

(c) the sole and exclusive rights in, title to and ownership, including, but not limited to, the right to use and control all masters, matrices, records.

or other reproductions or the performances embodied in such recordings by any method, electronic, magnetic, mechanical or other, now or hereafter know, obtained from recordings made here- under the performances embodied therein;

(d) the sole and exclusive right, if Company so desires, to to permit the public performances thereof, by means of radio broadcast or otherwise;''

Why the film was never released:

The reason the film was written off by Warner Brothers was because, due to technical difficulties, the film and music could not be put in sync. (document).

Telluride:

Ms. Franklin's contract, while hard to digest in an emergency session.

Atlantic Records refused Mr. Elliott access to Ms. Franklin's contract. Warner Films produced their copy of the personal service contract in 2013 after which Mr. Elliott, with the blessing of Warner Films, moved forward to finish the film for sale.

Plainly, there are releases for everyone in the production. The amount of information in terms of releases, contracts and planning are thorough and detailed. Every musician, choir member (even POTENTIAL choir members- those who could be possible replacements) are documented and accounted for with separate releases. Every 16 track tape, every 2 track tape, every piece of film was accounted for by, at the time, the largest film and music companies. Warners and Atlantic had a success a year prior with "Woodstock" and they were intent on duplicating a "synergy" between the film and music companies and had all ready used the blueprint (and would use it again and again).

Ms. Franklin presented to the court that she had no contract. However, after years of investigation, it is indisputable that Warner Films and Atlantic Records relied upon her personal services contract to make and distribute "Amazing Grace."

Fallout:

Ms. Franklin's offense rests on Warner Films mislabeling her contract when the company digitized it's paperwork from 40 years prior.

Ms. Franklin brought nuisance suits against Mr. Elliott, bullying him into agreements through threats, when in fact she had a contract which was being used the entire time and which she continues to collect on to this day.

Ms. Franklin took advantage of Mr. Elliott's lack of access to her contract.

- Detroit Free Press (<http://www.freep.com/story/entertainment/music/brian-mccollum/2015/08/20/aretha-franklin-possible-injunction-amazing-grace-toronto/32078407/>):

"Franklin's attorney cast doubt on the validity of the 1972 contract Elliott said he has since turned up.

'The Titanic will surface before this letter surfaces,' said Reed, adding that he has advised Elliott's attorney not to proceed with the Toronto screening. Such a contract would be irrelevant anyway, Reed said, because of the 2011 settlement agreement."

--

- every defense presented by Ms. Franklin has been done under false pretense:
 - she has a contract.
 - I would never have signed reed agreement if she had disclosed contract.
 - clearly every other thing is covered in ms franklin's contract. records, film, television.
 - wb either paid aretha the rate in the contract or considered it "promotional."
 - no responsibility to interpret what might have been negotiated- no [proof there was any intended payment](#).
 - can't disentangle/carve out of this specific film- there is no other documents.
 - fillmore east is currently [being sold](#).
 - abc documentary: 30 mins.: <http://teachrock.org/resources/video/embed/aretha-franklin-abc-news-closeup-1968/>
 - american masters: <http://www.pbs.org/wnet/americanmasters/aretha-franklin-about-aretha-franklin/598/>
 - bob rooyens film "live at concertgebouw" (<http://www.grooves-inc.com/franklin-aretha-live-1968-the-concertgebouw-amsterdam-rodeo-media-dvd-video-album-pZZa1-859540375.html>)(<http://www.jazzwax.com/2016/02/aretha-in-amsterdam-1968.html>)
 - (<http://www.openculture.com/2012/08/the-queen-of-soul-conquers-europe-aretha-franklin-in-amsterdam-1968.html>)-12 songs... it's for sale now (<https://www.redbullet.nl/en/organisation/onset/>) (<http://www.northendhaarem.nl/a-23574769/dvd-muziek/aretha-franklin-live-at-concertgebouw-1968-dvd/>)
 - 34 songs currently being "licensed" at reel in' in the years from the time under contract (http://reelintheyears.com/database-search/?stage=show_results)
 - wgbh licenses (<http://reelintheyears.com/wgbh-boston-and-reelin-in-the-years-productions-partner-to-license-music-footage/>)
- film from "Amazing Grace" is currently used- repeatedly. Countless. MTV, VH1, BET...
 - bet honors
 - kennedy center honors
 - photos are used from the filming.
 - album liner notes- she has approval: <http://alsrecordsandtapes.com/amazinglaw/wbdocs/amazingliner.jpg>
- no further documentation- only WB contract.
- The film was unreleased because of technical difficulties: film could not be synced with music (show memo)
- agreed with representative to a contract.
 - Lionsgate
 - Concord
- re: Telluride:
 - six months advanced notice was given to her representatives prior to Telluride. (not when Telluride announced on that friday- as Franklin claimed)
 - Franklin's lawyer, Arnold Reed, validated the WB contract with my lawyer, Todd Musburger before Reed got fired.
 - settlement language in previous and present agreement specifies "good faith negotiations."
 - interview published by detroit free press two weeks before detailing knowledge of toronto film festival. weird legal reading.
 - she has breached agreements for "good faith" both in Telluride and in prior 2011 settlement.
- detroit free press article on broken agreements: <http://www.freep.com/story/entertainment/music/brian-mccollum/2015/08/20/aretha-franklin-possible-injunction-amazing-grace-toronto/32078407/>
- History of shadiness: <http://www.deseretnews.com/article/681118/Refusal-to-pay-debts-tarnishing-Franklins-golden-image.html>
- Plainly, the film was made under contract with the full and complete compliance of Aretha Franklin.

Post-Denver/Telluride:

Court ordered "good faith negotiations."

we have offered every permutation(she can buy film, i'll await her passing... or she can have a million dollars)...

--

thank you.

-alan

phone: 323 988 9692

peace and love.

From: Todd Musburger todd@musburger.com
Subject: Re: Amazing Grace
Date: February 27, 2015 at 12:35 PM
To: alan elliott (ucla) alanelliott@g.ucla.edu

TM

Yes

iPhone Transmission Please excuse Typos & Peculiar abbreviations

On Feb 27, 2015, at 9:39 AM, alan elliott (ucla) <alanelliott@g.ucla.edu> wrote:

you ok with me responding to this (see below).

thank you.

-alan

phone: 323 988 9692

This email 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.

On Feb 27, 2015, at 11:22 AM, Stephen Carroll <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 <F819A5CE-6206-48F9-A115-F8736256F15E.tiff>
- 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.

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
Cell: 914-589-2474
Fax: 847-953-2692

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Fwd: Amazing Grace
Date: July 7, 2015 at 9:39 AM
To: Todd W. Musburger todd@musburger.com



the insurance quote attached

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.

Begin forwarded message:

From: Stephen Carroll <stephen.carroll@aon.com>
Date: March 4, 2015 at 12:25:07 PM PST
To: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Cc: "Ramona V. Horne" <ramona.horne@aon.com>, George Chignell <georgec@passion-pictures.com>, john battsek <john@passion-pictures.com>, Joe Boyd <boyd1j@yahoo.co.uk>, "Todd W. Musburger" <todd@musburger.com>
Subject: RE: Amazing Grace

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

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.

On Feb 27, 2015, at 1:42 PM, Stephen Carroll <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
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> 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
Cell: 914-589-2474
F 212 337 2000

Fax: 847-953-2692



Amazing Grace
Hiscox...te.PDF

189 KB

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Re: Amazing Grace
Date: July 7, 2015 at 9:59 AM
To: Todd Musburger todd@musburger.com



I just wanted you to see the money part...

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.

On Jul 7, 2015, at 9:47 AM, Todd Musburger <todd@musburger.com> wrote:

It's only a quote and it is subject to all clearances and consents having been made...

Todd W. Musburger
Todd W. Musburger, Ltd.
142 E. Ontario
Suite 500
Chicago, Illinois 60611
312 664 2600

On Tue, Jul 7, 2015 at 11:39 AM, alan elliott (ucla) <alanelliott@g.ucla.edu> wrote:
the insurance quote attached

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.

Begin forwarded message:

From: Stephen Carroll <stephen.carroll@aon.com>
Date: March 4, 2015 at 12:25:07 PM PST
To: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Cc: "Ramona V. Horne" <ramona.horne@aon.com>, George Chignell <georgec@passion-pictures.com>, john battsek <john@passion-pictures.com>, Joe Boyd <boyd1j@yahoo.co.uk>, "Todd W. Musburger" <todd@musburger.com>
Subject: RE: Amazing Grace

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.

On Feb 27, 2015, at 1:42 PM, Stephen Carroll <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> 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)

From: Robert Johnson raj@ineteconomics.org
Subject: Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: June 10, 2017 at 5:12 AM
To: alan elliott alanelliott@g.ucla.edu



Dear Alan,

Any updates? How can I be helpful?

Best,

RJ

Sent from my iPhone

On May 12, 2017, at 17:09, alan elliott <alanelliott@g.ucla.edu> wrote:

thank you.

-alan

phone: 323 988 9692

peace and love.

Begin forwarded message:

From: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Subject: Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: May 12, 2017 at 10:24:11 AM PDT
To: Laura Comerford <laura.comerford@aon.com>
Cc: Maria Clark <maria.clark@aon.com>

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.

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> 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>
Subject: amazing grace; 27700815
Date: May 8, 2017 at 1:56:22 PM PDT
To: Stephen Carroll <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: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: June 10, 2017 at 8:42 AM
To: Robert Johnson raj@ineteconomics.org



are you around to chat? please let me know when's good.

thank you.

-alan

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

peace and love.

On Jun 10, 2017, at 5:12 AM, Robert Johnson <raj@ineteconomics.org> wrote:

Dear Alan,

Any updates? How can I be helpful?

Best,

RJ

Sent from my iPhone

On May 12, 2017, at 17:09, alan elliott <alanelliott@g.ucla.edu> wrote:

thank you.

-alan

phone: 323 988 9692

peace and love.

Begin forwarded message:

From: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Subject: Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: May 12, 2017 at 10:24:11 AM PDT
To: Laura Comerford <laura.comerford@aon.com>
Cc: Maria Clark <maria.clark@aon.com>

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> 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>
Subject: amazing grace; 27700815
Date: May 8, 2017 at 1:56:22 PM PDT
To: Stephen Carroll <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: Robert Johnson raj@ineteconomics.org
Subject: Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: June 10, 2017 at 9:05 AM
To: alan elliott (ucla) alanelliott@g.ucla.edu

RJ

With my children now. Perhaps about 4 pm my time or a bit later.

Sent from my iPhone

On Jun 10, 2017, at 11:42, alan elliott (ucla) <alanelliott@g.ucla.edu> wrote:

are you around to chat? please let me know when's good.

thank you.

-alan

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

peace and love.

On Jun 10, 2017, at 5:12 AM, Robert Johnson <raj@ineteconomics.org> wrote:

Dear Alan,

Any updates? How can I be helpful?

Best,

RJ

Sent from my iPhone

On May 12, 2017, at 17:09, alan elliott <alanelliott@g.ucla.edu> wrote:

thank you.

-alan

phone: 323 988 9692

peace and love.

Begin forwarded message:

From: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Subject: Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: May 12, 2017 at 10:24:11 AM PDT
To: Laura Comerford <laura.comerford@aon.com>
Cc: Maria Clark <maria.clark@aon.com>

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> 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>
Subject: amazing grace; 27700815
Date: May 8, 2017 at 1:56:22 PM PDT
To: Stephen Carroll <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: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: June 10, 2017 at 9:13 AM
To: Robert Johnson raj@ineteconomics.org



whenever you get free

no rush

thank you.

-alan

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

peace and love.

On Jun 10, 2017, at 9:05 AM, Robert Johnson <raj@ineteconomics.org> wrote:

With my children now. Perhaps about 4 pm my time or a bit later.

Sent from my iPhone

On Jun 10, 2017, at 11:42, alan elliott (ucla) <alanelliott@g.ucla.edu> wrote:

are you around to chat? please let me know when's good.

thank you.

-alan

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

peace and love.

On Jun 10, 2017, at 5:12 AM, Robert Johnson <raj@ineteconomics.org> wrote:

Dear Alan,

Any updates? How can I be helpful?

Best,

RJ

Sent from my iPhone

On May 12, 2017, at 17:09, alan elliott <alanelliott@g.ucla.edu> wrote:

thank you.

-alan

phone: 323 988 9692

peace and love.

Begin forwarded message:

From: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Subject: Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: May 12, 2017 at 10:24:11 AM PDT
To: Laura Comerford <laura.comerford@aon.com>
Cc: Maria Clark <maria.clark@aon.com>

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 "

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> 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>

Subject: amazing grace; 27700815

Date: May 8, 2017 at 1:56:22 PM PDT

To: Stephen Carroll <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: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Fwd: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: May 9, 2017 at 12:43 PM
To: Lew Loss lloss@ljwllp.com, cchotvac@ljwllp.com



when i get in front of a computer, i'll draft it up.

thank you.

-alan

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

peace and love.

Begin forwarded message:

From: Laura Comerford <laura.comerford@aon.com>
Date: May 9, 2017 at 12:40:51 PM PDT
To: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Cc: Maria Clark <maria.clark@aon.com>, Laura Comerford <laura.comerford@aon.com>
Subject: amazing grace; 27700815 - E&O - Aretha Franklin Claim

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

-alan

phone: 323 988 9692

peace and love.

Begin forwarded message:

From: alan elliott (ucla) <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>

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: Charles Chotvacs cchotvacs@ljwllp.com
Subject: RE: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: May 9, 2017 at 12:54 PM
To: alan elliott (ucla) alanelliott@g.ucla.edu
Cc: Lew Loss lloss@ljwllp.com

CC

Alan –

Please send us your draft response first to review before sending it off to Laura.

Thanks,

Chuck

CHARLES W. CHOTVACS | LOSS, JUDGE & WARD, LLP

HAMILTON SQUARE | 600 14TH STREET, NW | SUITE 450 | WASHINGTON, DC 20005
DIRECT DIAL: 202.778.4078 | MAIN: 202.778.4060 | FACSIMILE: 202.778.4099
WWW.LJWLLP.COM

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Tuesday, May 09, 2017 3:44 PM
To: Lew Loss; Charles Chotvacs
Subject: Fwd: amazing grace; 27700815 - E&O - Aretha Franklin Claim

when i get in front of a computer, i'll draft it up.

thank you.

-alan

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

peace and love.

Begin forwarded message:

From: Laura Comerford <laura.comerford@aon.com>
Date: May 9, 2017 at 12:40:51 PM PDT
To: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Cc: Maria Clark <maria.clark@aon.com>, Laura Comerford <laura.comerford@aon.com>
Subject: amazing grace; 27700815 - E&O - Aretha Franklin Claim

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>
Subject: amazing grace; 27700815
Date: May 8, 2017 at 1:56:22 PM PDT
To: Stephen Carroll <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.

Please consider the environment before printing this e-mail.

This communication, including attachments, is confidential, may be subject to legal privileges, and is intended for the sole use of the addressee. Any use, duplication, disclosure, or dissemination of this communication, other than by the addressee, is prohibited. If you have received this communication in error, please notify the sender immediately and delete or destroy this communication and all copies.

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: May 9, 2017 at 12:59 PM
To: Charles Chotvacs cchotvacs@jwllp.com
Cc: Lew Loss lloss@jwllp.com



ok

thank you.

-alan

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

peace and love.

On May 9, 2017, at 12:54 PM, Charles Chotvacs <cchotvacs@jwllp.com> wrote:

Alan –

Please send us your draft response first to review before sending it off to Laura.

Thanks,

Chuck

CHARLES W. CHOTVACS | LOSS, JUDGE & WARD, LLP

HAMILTON SQUARE | 600 14TH STREET, NW | SUITE 450 | WASHINGTON, DC 20005
DIRECT DIAL: 202.778.4078 | MAIN: 202.778.4060 | FACSIMILE: 202.778.4099
WWW.LJWLLP.COM

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

Sent: Tuesday, May 09, 2017 3:44 PM

To: Lew Loss; Charles Chotvacs

Subject: Fwd: amazing grace; 27700815 - E&O - Aretha Franklin Claim

when i get in front of a computer, i'll draft it up.

thank you.

-alan

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

peace and love.

Begin forwarded message:

From: Laura Comerford <laura.comerford@aon.com>

Date: May 9, 2017 at 12:40:51 PM PDT

To: "alan elliott (ucla)" <alanelliott@g.ucla.edu>

Cc: Maria Clark <maria.clark@aon.com>, Laura Comerford

<laura.comerford@aon.com>

Subject: amazing grace; 27700815 - E&O - Aretha Franklin Claim

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:

Begin forwarded message:

From: alan elliott (ucla) <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>

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.

Please consider the environment before printing this e-mail.

This communication, including attachments, is confidential, may be subject to legal privileges, and is intended for the sole use of the addressee. Any use, duplication, disclosure, or dissemination of this communication, other than by the addressee, is prohibited. If you have received this communication in error, please notify the sender immediately and delete or destroy this communication and all copies.

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



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

...agree that the firm, upon payment, reimburses you for any fees, liability, or expenses 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> 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>

Subject: amazing grace; 27700815

Date: May 8, 2017 at 1:56:22 PM PDT

To: Stephen Carroll <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: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Fwd: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: May 12, 2017 at 10:24 AM
To: Lew Loss lloss@ljwllp.com, Charles Chotvacs cchotvacs@ljwllp.com



thank you.

-alan

phone: 323 988 9692

peace and love.

Begin forwarded message:

From: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Subject: Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: May 12, 2017 at 10:24:11 AM PDT
To: Laura Comerford <laura.comerford@aon.com>
Cc: Maria Clark <maria.clark@aon.com>

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

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> 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: 212-337-1351

DIRECT PHONE: 323 988 9692

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>
Subject: amazing grace; 27700815
Date: May 8, 2017 at 1:56:22 PM PDT
To: Stephen Carroll <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: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Fwd: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: May 12, 2017 at 10:27 AM
To: Shaun H. Crosner scrosner@linerlaw.com



hi shaun

i am around today.

in the "coincidence" dept.- i received your email right as i was sending the attached.

is 11 ok?

thank you.

-alan

phone: 323 988 9692

peace and love.

Begin forwarded message:

From: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Subject: Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: May 12, 2017 at 10:24:11 AM PDT
To: Laura Comerford <laura.comerford@aon.com>
Cc: Maria Clark <maria.clark@aon.com>

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> 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>
Subject: amazing grace; 27700815
Date: May 8, 2017 at 1:56:22 PM PDT
To: Stephen Carroll <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: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Fwd: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: May 12, 2017 at 11:18 AM
To: Todd W. Musburger todd@musburger.com



thank you.

-alan

phone: 323 988 9692

peace and love.

Begin forwarded message:

From: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Subject: Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: May 12, 2017 at 10:24:11 AM PDT
To: Laura Comerford <laura.comerford@aon.com>
Cc: Maria Clark <maria.clark@aon.com>

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

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> 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: 212-337-1351

DIRECT PHONE: 323 988 9692

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>
Subject: amazing grace; 27700815
Date: May 8, 2017 at 1:56:22 PM PDT
To: Stephen Carroll <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: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Fwd: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: May 12, 2017 at 2:09 PM
To: Robert Johnson raj@ineteconomics.org



thank you.

-alan

phone: 323 988 9692

peace and love.

Begin forwarded message:

From: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Subject: Re: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: May 12, 2017 at 10:24:11 AM PDT
To: Laura Comerford <laura.comerford@aon.com>
Cc: Maria Clark <maria.clark@aon.com>

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

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> 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: 212-337-1251

DIRECT PHONE: 212 337 4334

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>
Subject: amazing grace; 27700815
Date: May 8, 2017 at 1:56:22 PM PDT
To: Stephen Carroll <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>
Subject: amazing grace; 27700815
Date: May 8, 2017 at 1:56:22 PM PDT
To: Stephen Carroll <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 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



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> 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>
Subject: amazing grace; 27700815
Date: May 8, 2017 at 1:56:22 PM PDT
To: Stephen Carroll <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: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: June 1, 2017 at 10:57 AM
To: laura comerford laura.comerford@aon.com, Maria Clark maria.clark@aon.com
Cc: Todd W. Musburger todd@musburger.com



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>
Subject: Frankin v. Elliott
To: "alan elliott (ucla) (alanelliott@g.ucla.edu)" <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



Elliott-Franklin -
ltr to N...).docx

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Fwd: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: June 19, 2017 at 4:25 PM
To:



thank you.

-alan

phone: 323 988 9692

peace and love.

Begin forwarded message:

From: Maria Clark <maria.clark@aon.com>
Subject: RE: amazing grace; 27700815 - E&O - Aretha Franklin Claim
Date: June 19, 2017 at 1:38:57 PM PDT
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

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

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
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> 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

Laura K. 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>
Subject: Franklin v. Elliott
To: "alan elliott (ucla)" (alanelliott@g.ucla.edu)" <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

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Fwd: amazing grace; 27700815
Date: May 9, 2017 at 9:47 AM
To: laura.comerford@aon.com



thank you.

-alan

phone: 323 988 9692

peace and love.

Begin forwarded message:

From: alan elliott (ucla) <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>

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: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Fwd: amazing grace; 27700815
Date: May 4, 2017 at 2:38 PM
To: Charles Chotvacs cchotvacs@ljwllp.com, Lew Loss lloss@ljwllp.com



thank you.

-alan

phone: 323 988 9692

peace and love.

Begin forwarded message:

From: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Subject: amazing grace; 27700815
Date: May 4, 2017 at 2:37:49 PM PDT
To: Stephen Carroll <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.

thank you.

-alan

phone: 323 988 9692

peace and love.

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: amazing grace; 27700815
Date: May 8, 2017 at 1:56 PM
To: Stephen Carroll 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: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: amazing grace; 27700815
Date: May 4, 2017 at 2:37 PM
To: Stephen Carroll 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.

thank you.

-alan

phone: 323 988 9692

peace and love.

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Fwd: Amazing Grace!!
Date: August 20, 2015 at 5:38 PM
To: Tom Garvin tom@garvin-law.com



thank you.

-alan

phone: 323 988 9692

This email 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.

Begin forwarded message:

From: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Subject: **Amazing Grace!!**
Date: July 15, 2015 at 11:00:34 AM PDT
To: harmoni@amazon.com
Cc: Ted Hope <ted.hope@amazonstudios.com>, Liesl Copland <LCopland@wmeentertainment.com>, Tom McGuire <tmcguire@wmeentertainment.com>, "Todd W. Musburger" <todd@musburger.com>

hi harmoni

as todd and you discussed, i am sending:

- the insurance policy (see below- along with signed page from me as well)

- along with the email from the insurer with specific language (the policy has NO exclusions, the wb contract is fully covered bonded and includes the indemnification to atlantic records.)

if there are any questions, todd or i are available. now...

LET'S GO!!!

thank you.

-alan

phone: 323 988 9692

This email 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.

Begin forwarded message:

From: Stephen Carroll <stephen.carroll@aon.com>
Subject: **FW: 2700815 Amazing Grace**
Date: July 13, 2015 at 8:12:25 AM PDT
To: "alan elliott (ucla)" (alanelliott@g.ucla.edu) <alanelliott@g.ucla.edu>
Cc: Annette Shavuo <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 claim 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 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

Connect with Hiscox online

Web www.hiscoxbroker.com

Twitter [@Hiscox_USA](https://twitter.com/Hiscox_USA)



image003.png

5 KB

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.

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



IMG_8170
(1).jpg
[1.7 MB](#)



T&D Insurance
Propos...O.PDF
[371 KB](#)

(p.s.- question #22 has now been satisfied.)

From: alan elliott (ucla) alanelliott@g.ucla.edu

Subject: Re: Amazing Grace

Date: February 27, 2015 at 12:50 PM

To: Stephen Carroll stephen.carroll@aon.com

Cc: Ramona.horne@aon.com, George Chignell georgec@passion-pictures.com, john battsek john@passion-pictures.com, Joe Boyd boyd1j@yahoo.co.uk, Todd W. Musburger todd@musburger.com



hi stephen

please see answers below.

On Feb 27, 2015, at 11:22 AM, Stephen Carroll <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 F819A5CE-6206-48F...15E.tiff

Downloading...

- 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

Cell: 914-589-2474

Fax: 847-953-2692

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Re: Amazing Grace
Date: February 27, 2015 at 2:08 PM
To: Joe Boyd boyd1j@yahoo.co.uk



i'll call you in a few minutes...

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.

On Feb 27, 2015, at 1:49 PM, Joe Boyd <boyd1j@yahoo.co.uk> wrote:

Haven't your lawyers provided them with a more detailed description of the situation? Don't you need to give them more info - via your lawyers - in order for them not to renege when push comes to shove....?

J

From: alan elliott (ucla) <alanelliott@g.ucla.edu>
To: Stephen Carroll <stephen.carroll@aon.com>
Cc: Ramona.home@aon.com; George Chignell <georgec@passion-pictures.com>; john battsek <john@passion-pictures.com>; Joe Boyd <boyd1j@yahoo.co.uk>; Todd W. Musburger <todd@musburger.com>
Sent: Friday, 27 February 2015, 20:50
Subject: Re: Amazing Grace

hi stephen

please see answers below.

On Feb 27, 2015, at 11:22 AM, Stephen Carroll <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...?

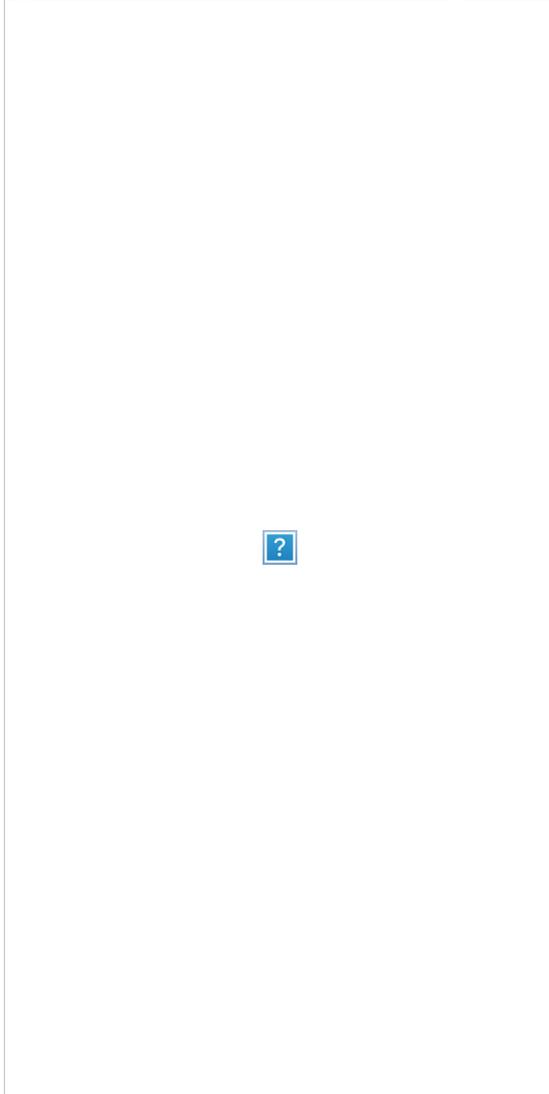
theatrical, vod, dvd, television

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



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?

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
Cell: 914-589-2474
Fax: 847-953-2692

<F819A5CE-6206-48F9-A115-F8736256F15E.tiff>

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Re: Amazing Grace
Date: March 4, 2015 at 12:23 PM
To: Stephen Carroll stephen.carroll@aon.com
Cc: Ramona V. Horne ramona.horne@aon.com, George Chignell georgec@passion-pictures.com, john battsek john@passion-pictures.com, Joe Boyd boyd1j@yahoo.co.uk, Todd W. Musburger todd@musburger.com



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.

On Feb 27, 2015, at 1:42 PM, Stephen Carroll <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
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> 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
Cell: 914-589-2474
Fax: 847-953-2692

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

On Feb 27, 2015, at 1:42 PM, Stephen Carroll <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
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> 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
Cell: 914-589-2474
Fax: 847-953-2692



Amazing Grace
Hiscox...te.PDF

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Fwd: Amazing Grace
Date: March 5, 2015 at 3:51 PM
To: Liesl Copland LCopland@wmeentertainment.com



fyi

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.

Begin forwarded message:

From: Stephen Carroll <stephen.carroll@aon.com>
Date: March 4, 2015 at 12:25:07 PM PST
To: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Cc: "Ramona V. Horne" <ramona.horne@aon.com>, George Chignell <georgec@passion-pictures.com>, john battsek <john@passion-pictures.com>, Joe Boyd <boyd1j@yahoo.co.uk>, "Todd W. Musburger" <todd@musburger.com>
Subject: RE: Amazing Grace

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...

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.

On Feb 27, 2015, at 1:42 PM, Stephen Carroll <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
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> 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
Cell: 914-589-2474
F 212 337 2000

Fax: 847-953-2692



Amazing Grace
Hiscox...te.PDF

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Fwd: Amazing Grace
Date: March 5, 2015 at 3:52 PM
To: Liesl Copland LCopland@wmeentertainment.com



and lawyer notes on insurance

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.

Begin forwarded message:

From: Todd Musburger <todd@musburger.com>
Date: March 4, 2015 at 1:57:16 PM PST
To: "alan elliott (ucla)" <alanelliott@g.ucla.edu>, Brian Musburger <Brian@musburger.com>
Subject: Re: Amazing Grace

A careful reading of the endorsements is important...I find the policy to be largely illusory for what we need...Call the agent and have a full discussion...

Todd W. Musburger
Todd W. Musburger, Ltd.
142 E. Ontario
Suite 500
Chicago, Illinois 60611
312 664 2600

On Wed, Mar 4, 2015 at 3:11 PM, alan elliott (ucla) <alanelliott@g.ucla.edu> wrote:
looks like we have insurance...

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.

Begin forwarded message:

From: Stephen Carroll <stephen.carroll@aon.com>
Date: March 4, 2015 at 12:25:07 PM PST
To: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Cc: "Ramona V. Horne" <ramona.horne@aon.com>, George Chignell <georgec@passion-pictures.com>, john battsek <john@passion-pictures.com>, Joe Boyd <boyd1j@yahoo.co.uk>, "Todd W. Musburger" <todd@musburger.com>
Subject: RE: Amazing Grace

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: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

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.

On Feb 27, 2015, at 1:42 PM, Stephen Carroll <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> 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)

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



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

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.

On Mar 4, 2015, at 12:25 PM, Stephen Carroll <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



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.

On Feb 27, 2015, at 1:42 PM, Stephen Carroll <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> 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: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Fwd: amazing grace app
Date: February 25, 2015 at 10:21 AM
To: Todd W. Musburger todd@musburger.com



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.

Begin forwarded message:

From: Stephen Carroll <stephen.carroll@aon.com>
Date: February 25, 2015 at 10:04:02 AM PST
To: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Cc: "Ramona V. Horne" <ramona.horne@aon.com>, George Chignell <georgec@passion-pictures.com>, john battsek <john@passion-pictures.com>, "Joe Boyd" <boyd1j@yahoo.co.uk>
Subject: RE: amazing grace app

Yes... I should have the quote tomorrow.

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, February 25, 2015 1:01 PM
To: Stephen Carroll
Cc: Ramona V. Horne; George Chignell; john battsek; Joe Boyd
Subject: amazing grace app

any update?

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

| 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.

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Fwd: amazing grace confirmation
Date: July 20, 2015 at 1:49 PM
To: Todd W. Musburger todd@musburger.com



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.

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Date: July 20, 2015 at 1:27:21 PM PDT
To: "alanelliott@g.ucla.edu" <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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

From: Amanda Roytbak
Sent: Tuesday, July 14, 2015 2:31 PM
To: 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

This message is intended only for the named recipient and may contain confidential, proprietary or legally privileged information. Unauthorized individuals or entities are not permitted access to this information. Any dissemination, distribution, or copying of this information is strictly prohibited. If you have received this message in error, please advise the sender by reply e-mail, and delete this message and any attachments.

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

julie iss cc'd here.

thank you.

-alan

phone: 323 988 9692

This email 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.

On Jul 14, 2015, at 11:13 AM, Amanda Roytbak

On Jul 17, 2013, at 11:13 AM, Amanda Roybak
<amanda.roybak@aon.com> wrote:

please bill directly to:

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



E&O Invoice -
Choices.pdf
[Downloading...](#)

From: Julie Huntsinger juliehuntsinger@me.com
Subject: Re: amazing grace confirmation
Date: July 20, 2015 at 1:55 PM
To: alan elliott (ucla) 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
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> wrote:

hey Julie

Can you pls see if this is en route?

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.

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Date: July 20, 2015 at 1:27:21 PM PDT
To: "alanelliott@g.ucla.edu" <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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

From: Amanda Roytbak
Sent: Tuesday, July 14, 2015 2:31 PM
To: 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

This message is intended only for the named recipient and may contain confidential, proprietary or legally privileged information. Unauthorized individuals or entities are not permitted access to this information. Any dissemination, distribution, or copying of this information is strictly prohibited. If you have received this message in error, please advise the sender by reply e-mail, and delete this message and any attachments.

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

Telluride Film Festival
(510) 665-9494
juliehuntsinger@mac.com

julie iss cc'd here.

thank you.

-alan

phone: 323 988 9692

This email 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.

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

please bill directly to:

Julie Huntsinger
Executive Director
Telluride Film Festival
(510) 665-9494
juliehuntsinger@mac.com

<E&O Invoice - Choices.pdf>

From: alan elliott (ucla) alanelliott@g.ucla.edu

Subject: Fwd: amazing grace confirmation

Date: July 20, 2015 at 1:59 PM

To: Tom McGuire tmcguire@wmeentertainment.com, Liesl Copland LCopland@wmeentertainment.com, Todd W. Musburger todd@musburger.com



the check... hopefully will land in insurance hands tomorrow...

thank you.

-alan

phone: 323 988 9692

This email 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.

Begin forwarded message:

From: Julie Huntsinger <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>

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
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> wrote:

hey Julie

Can you pls see if this is en route?

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.

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Date: July 20, 2015 at 1:27:21 PM PDT
To: "alanelliott@g.ucla.edu" <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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

From: Amanda Roytbak
Sent: Tuesday, July 14, 2015 2:31 PM
To: 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

This message is intended only for the named recipient and may contain confidential, proprietary or legally privileged information. Unauthorized individuals or entities are not permitted access to this information. Any dissemination, distribution, or copying of this information is strictly prohibited. If you have received this message in error, please advise the sender by reply e-mail, and delete this message and any attachments.

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

julie iss cc'd here.

thank you.

-alan

phone: 323 988 9692

This email 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.

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

please bill directly to:

Julie Huntsinger
Executive Director
Telluride Film Festival
[\(510\) 665 0404](tel:(510)665-0404)



(210) 605-7474

juliehuntsinger@mac.com

<E&O Invoice - Choices.pdf>

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Fwd: amazing grace confirmation
Date: July 20, 2015 at 2:00 PM
To: Annette Shavuo annette.shavuo@aon.com



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

thank you.

-alan

phone: 323 988 9692

This email 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.

Begin forwarded message:

From: Julie Huntsinger <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>

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
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> wrote:

hey Julie

Can you pls see if this is en route?

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.

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Date: July 20, 2015 at 1:27:21 PM PDT
To: "alanelliott@g.ucla.edu" <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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

From: Amanda Roytbak
Sent: Tuesday, July 14, 2015 2:31 PM
To: 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

This message is intended only for the named recipient and may contain confidential, proprietary or legally privileged information. Unauthorized individuals or entities are not permitted access to this information. Any dissemination, distribution, or copying of this information is strictly prohibited. If you have received this message in error, please advise the sender by reply e-mail, and delete this message and any attachments.

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

julie iss cc'd here.

thank you.

-alan

phone: 323 988 9692

This email 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.

On Jul 14, 2015, at 11:13 AM, Amanda Roytbak
<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

<E&O Invoice - Choices.pdf>

From: Liesl Copland LCopland@wmeentertainment.com

Subject: RE: amazing grace confirmation

Date: July 20, 2015 at 6:07 PM

To: alan elliott (ucla) alanelliott@g.ucla.edu, Tom McGuire TMcGuire@wmeentertainment.com, Todd W. Musburger todd@musburger.com

Cc: Liesl Copland Assistant LCopland_Asst@wmeentertainment.com

LC

Did we get the policy? Are we all speaking? Should my office set? I think we have to set the call with Josh Kramer to do as he asked and confirm our understanding – am happy to set that with us and Josh and talk before.

Liesl Copland | WME

LCopland@wmeentertainment.com

310.246.3383

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

Sent: Monday, July 20, 2015 1:59 PM

To: Tom McGuire; Liesl Copland; Todd W. Musburger

Subject: Fwd: amazing grace confirmation

the check... hopefully will land in insurance hands tomorrow...

thank you.

-alan

phone: 323 988 9692

This email 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.

Begin forwarded message:

From: Julie Huntsinger <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>

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
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> wrote:

hey Julie

Can you pls see if this is en route?

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.

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Date: July 20, 2015 at 1:27:21 PM PDT
To: "alanelliott@g.ucla.edu" <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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

From: Amanda Roytbak
Sent: Tuesday, July 14, 2015 2:31 PM
To: 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

This message is intended only for the named recipient and may contain confidential, proprietary or legally privileged information. Unauthorized individuals or entities are not permitted access to this information. Any dissemination, distribution, or copying of this information is strictly prohibited. If you have received this message in error, please advise the sender by reply e-mail, and delete this message and any attachments.

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

julie iss cc'd here.

thank you.

-alan

phone: 323 988 9692

This email 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.

On Jul 14, 2015, at 11:13 AM, Amanda Roytbak
<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

<E&O Invoice - Choices.pdf>

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Re: amazing grace confirmation
Date: July 21, 2015 at 8:34 AM
To: Annette Shavuo annette.shavuo@aon.com



hi Annette

any sign of the check yet? please let me 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.

On Jul 20, 2015, at 2:10 PM, Annette Shavuo <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

Before you print, think about the ENVIRONMENT 🌱

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

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

This email 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.

Begin forwarded message:

From: Julie Huntsinger <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>

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
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> wrote:

hey Julie

Can you pls see if this is en route?

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.

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Date: July 20, 2015 at 1:27:21 PM PDT
To: "alanelliott@g.ucla.edu" <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

Before you print, think about the ENVIRONMENT 🌱

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

From: Amanda Roytbak
Sent: Tuesday, July 14, 2015 2:31 PM
To: 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

This message is intended only for the named recipient and may contain confidential, proprietary or legally privileged information. Unauthorized individuals or entities are not permitted access to this information. Any dissemination, distribution, or copying of this information is strictly prohibited. If you have received this message in error, please advise the sender by reply e-mail, and delete this message and any attachments.

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
juliehuntsinger@mac.com

julie iss cc'd here.

thank you.

-alan

phone: 323 988 9692

This email 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.

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

please bill directly to:

• • • • •

Julie Huntsinger
Executive Director
Telluride Film Festival
(510) 665-9494
juliehuntsinger@mac.com

<E&O Invoice - Choices.pdf>

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Fwd: amazing grace confirmation
Date: July 21, 2015 at 9:19 AM
To: Todd W. Musburger todd@musburger.com



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.

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Date: July 21, 2015 at 8:37:51 AM PDT
To: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Subject: RE: amazing grace confirmation

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

Before you print, think about the ENVIRONMENT 🌱

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

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

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.

On Jul 20, 2015, at 2:10 PM, Annette Shavuo <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

Before you print, think about the ENVIRONMENT A small green recycling symbol consisting of three chasing arrows forming a triangle.

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

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

This email 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.

Begin forwarded message:

From: Julie Huntsinger <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>

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
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> wrote:

hey Julie

Can you pls see if this is en route?

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.

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Date: July 20, 2015 at 1:27:21 PM PDT
To: "alanelliott@g.ucla.edu" <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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

From: Amanda Roytbak
Sent: Tuesday, July 14, 2015 2:31 PM
To: 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

This message is intended only for the named recipient and may contain confidential, proprietary or legally privileged information. Unauthorized individuals or entities are not permitted access to this information. Any dissemination, distribution, or copying of this information is strictly prohibited. If you have received this message in error, please advise the sender by reply e-mail, and delete this message and any attachments.

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

julie iss cc'd here.

thank you.

-alan

phone: 323 988 9692

This email 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 are strictly prohibited), and so notify the sender by reply to alanelliott@ucla.edu

which acts are strictly prohibited), and so notify the sender by reply info@alanemott.net.

On Jul 14, 2015, at 11:13 AM, Amanda Roytbak
<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

<E&O Invoice - Choices.pdf>

From: alan elliott (ucla) alanelliott@g.ucla.edu

Subject: Re: amazing grace confirmation

Date: July 21, 2015 at 11:46 AM

To: Liesl Copland LCopland@wmeentertainment.com

Cc: Tom McGuire TMcGuire@wmeentertainment.com, Todd W. Musburger todd@musburger.com, Liesl Copland Assistant LCopland_Asst@wmeentertainment.com



ok

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.

On Jul 21, 2015, at 11:38 AM, Liesl Copland <LCopland@wmeentertainment.com> wrote:

To be clear, set the call with Josh and Ted? I will reach out. Let's us four talk 10 mins before. TJ will set. Agreed?

Liesl Copland | WME

LCopland@wmeentertainment.com

310.246.3383

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

Sent: Monday, July 20, 2015 6:14 PM

To: Liesl Copland

Cc: Tom McGuire; Todd W. Musburger; Liesl Copland Assistant

Subject: Re: amazing grace confirmation

yes- pls set it. let's have ted on there too. they should understand (as I put in my last email to ted) that Aretha is nonstarter... and non needed...

re insurance... tomorrow I hope. telluride didn't send check too Friday... I didn't feel I was in a position to complain tho...

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.

On Jul 20, 2015, at 6:07 PM, Liesl Copland <LCopland@wmeentertainment.com> wrote:

Did we get the policy? Are we all speaking? Should my office set? I think we have to set the call with Josh Kramer to do as he asked and confirm our understanding – am happy to set that with us and Josh and talk before.

Liesl Copland | WME
LCopland@wmeentertainment.com
310.246.3383

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Monday, July 20, 2015 1:59 PM
To: Tom McGuire; Liesl Copland; Todd W. Musburger
Subject: Fwd: amazing grace confirmation

the check... hopefully will land in insurance hands tomorrow...

thank you.

-alan

phone: 323 988 9692

This email 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.

Begin forwarded message:

From: Julie Huntsinger <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>

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
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> wrote:

hey Julie

Can you pls see if this is en route?

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.

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Date: July 20, 2015 at 1:27:21 PM PDT
To: "alanelliott@g.ucla.edu" <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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

From: Amanda Roytbak
Sent: Tuesday, July 14, 2015 2:31 PM
To: 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

This message is intended only for the named recipient and may contain confidential, proprietary or legally privileged information. Unauthorized individuals or entities are not permitted access to this information. Any dissemination, distribution, or copying of this information is strictly prohibited. If you have received this message in error, please advise the sender by reply e-mail, and delete this message and any attachments.

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
juliehuntsinger@mac.com

julie iss cc'd here.

thank you.

-alan

phone: 323 988 9692

This email 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.

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

please bill directly to:

Julie Huntsinger
Executive Director
Telluride Film Festival
(510) 665-9494
juliehuntsinger@mac.com

From: Liesl Copland Assistant LCopland_Asst@wmeentertainment.com

Subject: RE: amazing grace confirmation

Date: July 21, 2015 at 12:18 PM

To: alan elliott (ucla) alanelliott@g.ucla.edu, Todd W. Musburger todd@musburger.com

Cc: Tom McGuire Assistant tmcguire_asst@wmeentertainment.com, Liesl Copland Assistant LCopland_Asst@wmeentertainment.com

LA

Hi Alan and Todd,

Do any of the below times work for you both? I will then reach out to Ted and Josh. Thank you!

7/22: 4pm

7/23: 11:30am; 3pm – 4pm; 5pm – EOD

7/24: 11am – 1pm; 2pm – 3pm

TJ Smith | WME

Office of Liesl Copland

LCopland_Asst@wmeentertainment.com

310.246.3383

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

Sent: Tuesday, July 21, 2015 11:47 AM

To: Liesl Copland

Cc: Tom McGuire; Todd W. Musburger; Liesl Copland Assistant

Subject: Re: amazing grace confirmation

ok

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.

On Jul 21, 2015, at 11:38 AM, Liesl Copland <LCopland@wmeentertainment.com> wrote:

To be clear, set the call with Josh and Ted? I will reach out. Let's us four talk 10 mins before. TJ will set. Agreed?

Liesl Copland | WME

LCopland@wmeentertainment.com

310.246.3383

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Monday, July 20, 2015 6:14 PM
To: Liesl Copland
Cc: Tom McGuire; Todd W. Musburger; Liesl Copland Assistant
Subject: Re: amazing grace confirmation

yes- pls set it. let's have ted on there too. they should understand (as I put in my last email to ted) that Aretha is nonstarter... and non needed...

re insurance... tomorrow I hope. telluride didn't send check too Friday... I didn't feel I was in a position to complain tho...

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.

On Jul 20, 2015, at 6:07 PM, Liesl Copland
<LCopland@wmeentertainment.com> wrote:

Did we get the policy? Are we all speaking? Should my office set? I think we have to set the call with Josh Kramer to do as he asked and confirm our understanding – am happy to set that with us and Josh and talk before.

Liesl Copland | WME
LCopland@wmeentertainment.com
310.246.3383

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Monday, July 20, 2015 1:59 PM

Sent: Monday, July 20, 2015 1:55 PM

To: Tom McGuire; Liesl Copland; Todd W. Musburger

Subject: Fwd: amazing grace confirmation

the check... hopefully will land in insurance hands tomorrow...

thank you.

-alan

phone: 323 988 9692

This email 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.

Begin forwarded message:

From: Julie Huntsinger <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>

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
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> wrote:

alanelliott@g.ucla.edu WFOC.

hey Julie

Can you pls see if this is en route?

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.

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Date: July 20, 2015 at 1:27:21 PM PDT
To: "alanelliott@g.ucla.edu" <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

Before you print, think about the ENVIRONMENT 🌱

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the

information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

From: Amanda Roytbak
Sent: Tuesday, July 14, 2015 2:31 PM
To: 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

This message is intended only for the named recipient and may contain confidential, proprietary or legally privileged information. Unauthorized individuals or entities are not permitted access to this information. Any dissemination, distribution, or copying of this information is strictly prohibited. If you have received this message in error, please advise the sender by reply e-mail, and delete this message and any attachments.

From: alan elliott (ucla) [<mailto:alanelriott@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

julie iss cc'd here.

thank you.

-alan

phone: 323 988 9692

This email 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.

On Jul 14, 2015, at 11:13 AM, Amanda Roytbak <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
m

<E&O Invoice - Choices.pdf>

From: Todd Musburger todd@musburger.com
Subject: Re: amazing grace confirmation
Date: July 21, 2015 at 12:21 PM
To: Liesl Copland Assistant LCopland_Asst@wmeentertainment.com
Cc: alan elliott (ucla) alanelliott@g.ucla.edu, Tom McGuire Assistant tmcguire_asst@wmeentertainment.com



TJ: 7/22 Can't do
7/23 11:30
7/24 11:00 to 1:00...Thanks, Todd

Todd W. Musburger
Todd W. Musburger, Ltd.
142 E. Ontario
Suite 500
Chicago, Illinois 60611
312 664 2600

On Tue, Jul 21, 2015 at 2:18 PM, Liesl Copland Assistant <LCopland_Asst@wmeentertainment.com> wrote:

Hi Alan and Todd,

Do any of the below times work for you both? I will then reach out to Ted and Josh. Thank you!

7/22: 4pm

7/23: 11:30am; 3pm – 4pm; 5pm – EOD

7/24: 11am – 1pm; 2pm – 3pm

TJ Smith | WME
Office of Liesl Copland
LCopland_Asst@wmeentertainment.com
[310.246.3383](tel:310.246.3383)

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

Sent: Tuesday, July 21, 2015 11:47 AM

To: Liesl Copland
Cc: Tom McGuire; Todd W. Musburger; Liesl Copland Assistant
Subject: Re: amazing grace confirmation

ok

thank you.

phone: [323 988 9692](tel: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.

On Jul 21, 2015, at 11:38 AM, Liesl Copland <LCopland@wmeentertainment.com> wrote:

To be clear, set the call with Josh and Ted? I will reach out. Let's us four talk 10 mins before. TJ will set. Agreed?

Liesl Copland | WME

LCopland@wmeentertainment.com
[310.246.3383](tel:310-246-3383)

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Monday, July 20, 2015 6:14 PM
To: Liesl Copland
Cc: Tom McGuire; Todd W. Musburger; Liesl Copland Assistant
Subject: Re: amazing grace confirmation

yes- pls set it. let's have ted on there too. they should understand (as I put in my last email to ted) that Aretha is nonstarter... and non needed...

re insurance... tomorrow I hope. telluride didn't send check too Friday... I didn't feel I was in a position to complain tho...

thank you.

phone: [323 988 9692](tel: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.

On Jul 20, 2015, at 6:07 PM, Liesl Copland <LCopland@wmeentertainment.com> wrote:

Did we get the policy? Are we all speaking? Should my office set? I think we have to set the call with Josh Kramer to do as he asked and confirm our understanding – am happy to set that with us and Josh

confirm our understanding. I am happy to set that with us and Josh
and talk before.

Liesl Copland | WME

LCopland@wmeentertainment.com
[310.246.3383](tel:310.246.3383)

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Monday, July 20, 2015 1:59 PM
To: Tom McGuire; Liesl Copland; Todd W. Musburger
Subject: Fwd: amazing grace confirmation

the check... hopefully will land in insurance hands tomorrow...

thank you.

-alan

phone: 323 988 9692

This email 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.

Begin forwarded message:

From: Julie Huntsinger <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>

Hi Alan,

It is en route

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](tel:5106659494)
juliehuntsinger@mac.com
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> wrote:

hey Julie

Can you pls see if this is en route?

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.

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Date: July 20, 2015 at 1:27:21 PM PDT
To: "alanelliott@g.ucla.edu" <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](tel:(212)627-7400) / Direct: [\(212\) 463-5586](tel:(212)463-5586)

Fax: [\(212\) 633-1457](tel:(212)633-1457) / Direct: [\(847\) 953-0849](tel:(847)953-0849)

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

From: Amanda Roytbak
Sent: Tuesday, July 14, 2015 2:31 PM
To: 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](tel:212.337.4357)

This message is intended only for the named recipient and may contain confidential, proprietary or legally privileged information. Unauthorized individuals or entities are not permitted access to this information. Any dissemination, distribution, or copying of this information is strictly prohibited. If you have received this message in error, please advise the sender by reply e-mail, and delete this message and any attachments.

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:5106659494)
juliehuntsinger@mac.com

julie iss cc'd here.

thank you.

-alan

phone: 323 988 9692

This email 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.

On Jul 14, 2015, at 11:13 AM, Amanda Roytbak
<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

<E&O Invoice - Choices.pdf>

From: Annette Shavuo 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, Stephen Carroll stephen.carroll@aon.com
Cc: Todd W. Musburger 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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

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



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
Policy Delivery Via:			

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

This email 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

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Re: amazing grace confirmation
Date: February 24, 2016 at 10:05 PM
To: Annette Shavuo annette.shavuo@aon.com



hi annette

can you please send me a copy of the full policy for "amazing grace."

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> 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

Before you print, think about the ENVIRONMENT 🌱

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

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



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.

On Jul 20, 2015, at 2:10 PM, Annette Shavuo <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

Before you print, think about the ENVIRONMENT 🌱

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

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

This email 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.

Begin forwarded message:

From: Julie Huntsinger <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>

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
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> wrote:

hey Julie

Can you pls see if this is en route?

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.

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Date: July 20, 2015 at 1:27:21 PM PDT
To: "alanelliott@g.ucla.edu" <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

Before you print, think about the ENVIRONMENT 🌱

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

From: Amanda Roytbak
Sent: Tuesday, July 14, 2015 2:31 PM
To: 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

This message is intended only for the named recipient and may contain confidential, proprietary or legally privileged information. Unauthorized individuals or entities are not permitted access to this information. Any dissemination, distribution, or copying of this information is strictly prohibited. If you have received this message in error, please advise the sender by reply e-mail, and delete this message and any attachments.

From: alan elliott (ucla) [<mailto:alanelriott@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
juliehuntsinger@mac.com

julie iss cc'd here.

thank you.

-alan

phone: 323 988 9692

This email 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@alanelriott.net

info@arianemott.net.

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

please bill directly to:

Julie Huntsinger
Executive Director
Telluride Film Festival
(510) 665-9494
juliehuntsinger@mac.com

<E&O Invoice - Choices.pdf>

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Re: amazing grace confirmation
Date: February 25, 2016 at 10:57 AM
To: Stephen Carroll stephen.carroll@aon.com



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> 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

Before you print, think about the ENVIRONMENT 🌱

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

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



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.

On Jul 20, 2015, at 2:10 PM, Annette Shavuo <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

Before you print, think about the ENVIRONMENT 🌱

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

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

This email 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.

Begin forwarded message:

From: Julie Huntsinger <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>

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
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> wrote:

hey Julie

Can you pls see if this is en route?

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.

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Date: July 20, 2015 at 1:27:21 PM PDT
To: "alanelliott@g.ucla.edu" <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

Before you print, think about the ENVIRONMENT 🌱

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

From: Amanda Roytbak
Sent: Tuesday, July 14, 2015 2:31 PM
To: 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

This message is intended only for the named recipient and may contain confidential, proprietary or legally privileged information. Unauthorized individuals or entities are not permitted access to this information. Any dissemination, distribution, or copying of this information is strictly prohibited. If you have received this message in error, please advise the sender by reply e-mail, and delete this message and any attachments.

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
juliehuntsinger@mac.com

julie iss cc'd here.

thank you.

-alan

phone: 323 988 9692

This email 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

info@arianemott.net.

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

please bill directly to:

Julie Huntsinger
Executive Director
Telluride Film Festival
(510) 665-9494
juliehuntsinger@mac.com

<E&O Invoice - Choices.pdf>

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Fwd: amazing grace confirmation
Date: February 26, 2016 at 10:55 AM
To: Shaun H. Crosner scrosner@linerlaw.com



thank you.

-alan

phone: 323 988 9692
peace and love.

<http://songsoundrecord.tumblr.com>

Begin forwarded message:

From: alan elliott (ucla) <alanelliott@g.ucla.edu>
Subject: Re: amazing grace confirmation
Date: February 25, 2016 at 10:57:58 AM PST
To: Stephen Carroll <stephen.carroll@aon.com>

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> 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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the

intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

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



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.

On Jul 20, 2015, at 2:10 PM, Annette Shavuo <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

Before you print, think about the ENVIRONMENT A small green recycling symbol consisting of three chasing arrows forming a triangle.

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

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

This email 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.

Begin forwarded message:

From: Julie Huntsinger <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>

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
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>

wrote:

hey Julie

Can you pls see if this is en route?

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.

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Date: July 20, 2015 at 1:27:21 PM PDT
To: "alanelliott@ucla.edu" <alanelliott@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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited

from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

From: Amanda Roytbak
Sent: Tuesday, July 14, 2015 2:31 PM
To: 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

This message is intended only for the named recipient and may contain confidential, proprietary or legally privileged information. Unauthorized individuals or entities are not permitted access to this information. Any dissemination, distribution, or copying of this information is strictly prohibited. If you have received this message in error, please advise the sender by reply e-mail, and delete this message and any attachments.

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

julie iss cc'd here.

thank you.

-alan

phone: 323 988 9692

This email 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.

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

please bill directly to:

Julie Huntsinger
Executive Director
Telluride Film Festival
(510) 665-9494
juliehuntsinger@mac.com

<E&O Invoice - Choices.pdf>

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Fwd: amazing grace confirmation
Date: February 26, 2016 at 10:55 AM
To: Shaun H. Crosner scrosner@linerlaw.com



thank you.

-alan

phone: 323 988 9692
peace and love.

<http://songsoundrecord.tumblr.com>

Begin forwarded message:

From: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Subject: Re: amazing grace confirmation
Date: February 24, 2016 at 10:05:33 PM PST
To: Annette Shavuo <annette.shavuo@aon.com>

hi annette

can you please send me a copy of the full policy for "amazing grace."

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> 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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the

intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

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



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.

On Jul 20, 2015, at 2:10 PM, Annette Shavuo <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

Before you print, think about the ENVIRONMENT A small green recycling symbol consisting of three chasing arrows forming a triangle.

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

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

This email 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.

Begin forwarded message:

From: Julie Huntsinger <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>

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
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>

wrote:

hey Julie

Can you pls see if this is en route?

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.

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Date: July 20, 2015 at 1:27:21 PM PDT
To: "alanelliott@g.ucla.edu" <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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited

from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

From: Amanda Roytbak
Sent: Tuesday, July 14, 2015 2:31 PM
To: 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

This message is intended only for the named recipient and may contain confidential, proprietary or legally privileged information. Unauthorized individuals or entities are not permitted access to this information. Any dissemination, distribution, or copying of this information is strictly prohibited. If you have received this message in error, please advise the sender by reply e-mail, and delete this message and any attachments.

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

julie iss cc'd here.

thank you.

-alan

phone: 323 988 9692

This email 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.

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

please bill directly to:

Julie Huntsinger
Executive Director
Telluride Film Festival
(510) 665-9494
juliehuntsinger@mac.com

<E&O Invoice - Choices.pdf>

From: Stephen Carroll stephen.carroll@aon.com 
Subject: RE: amazing grace confirmation
Date: February 26, 2016 at 12:56 PM
To: alan elliott 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> 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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

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



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.

On Jul 20, 2015, at 2:10 PM, Annette Shavuo <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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

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

This email 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.

Begin forwarded message:

From: Julie Huntsinger <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>

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
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> wrote:

hey Julie

Can you pls see if this is en route?

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.

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Date: July 20, 2015 at 1:27:21 PM PDT
To: "alanelliott@g.ucla.edu" <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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

From: Amanda Roytbak
Sent: Tuesday, July 14, 2015 2:31 PM
To: 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

This message is intended only for the named recipient and may contain confidential, proprietary or legally privileged information. Unauthorized individuals or entities are not permitted access to this information. Any dissemination, distribution, or copying of this information is strictly prohibited. If you have received this message in error, please advise the sender by reply e-mail, and delete this message and any attachments.

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

julie iss cc'd here.

thank you.

-alan

phone: 323 988 9692

This email 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@alaneliott.net.

On Jul 14, 2015, at 11:13 AM, Amanda Roytbak <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: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Fwd: amazing grace confirmation
Date: February 26, 2016 at 12:57 PM
To: Shaun H. Crosner scrosner@linerlaw.com



thank you.

-alan

phone: [323 988 9692](tel:3239889692)
peace and love.

Begin forwarded message:

From: Stephen Carroll <stephen.carroll@aon.com>
Date: February 26, 2016 at 12:56:44 PM PST
To: alan elliott <alanelliott@g.ucla.edu>
Subject: RE: amazing grace confirmation

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>

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

Before you print, think about the ENVIRONMENT 🌱

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

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



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.

On Jul 20, 2015, at 2:10 PM, Annette Shavuo <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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

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

This email 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.

Begin forwarded message:

From: Julie Huntsinger <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>

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
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> wrote:

hey Julie

Can you pls see if this is en route?

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.

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Date: July 20, 2015 at 1:27:21 PM PDT
To: "alanelliott@g.ucla.edu" <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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

From: Amanda Roytbak
Sent: Tuesday, July 14, 2015 2:31 PM
To: 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

This message is intended only for the named recipient and may contain confidential, proprietary or legally privileged information. Unauthorized individuals or entities are not permitted access to this information. Any dissemination, distribution, or copying of this information is strictly prohibited. If you have received this message in error, please advise the sender by reply e-mail, and delete this message and any attachments.

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

julie iss cc'd here.

thank you.

-alan

phone: 323 988 9692

This email 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.

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

please bill directly to:

Julie Huntsinger
Executive Director
Telluride Film Festival
(510) 665-9494
juliehuntsinger@mac.c
om

<E&O Invoice - Choices.pdf>



2700815_9.pdf

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Re: amazing grace confirmation
Date: February 26, 2016 at 12:59 PM
To: Stephen Carroll stephen.carroll@aon.com



thank you.

-alan

phone: [323 988 9692](tel:3239889692)
peace and love.

On Feb 26, 2016, at 12:56 PM, Stephen Carroll <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
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> 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

Before you print, think about the ENVIRONMENT 🌱

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

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



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.

On Jul 20, 2015, at 2:10 PM, Annette Shavuo <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

Before you print, think about the ENVIRONMENT 🌱

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

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

This email 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.

Begin forwarded message:

From: Julie Huntsinger <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>

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
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> wrote:

hey Julie

Can you pls see if this is en route?

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.

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Date: July 20, 2015 at 1:27:21 PM PDT
To: "alanelliott@g.ucla.edu" <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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

From: Amanda Roytbak
Sent: Tuesday, July 14, 2015 2:31 PM
To: 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

This message is intended only for the named recipient and may contain confidential, proprietary or legally privileged information. Unauthorized individuals or entities are not permitted access to this information. Any dissemination, distribution, or copying of this information is strictly prohibited. If you have received this message in error,

of this information is strictly prohibited. If you have received this message in error, please advise the sender by reply e-mail, and delete this message and any attachments.

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

julie iss cc'd here.

thank you.

-alan

phone: 323 988 9692

This email 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.

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

please bill directly to:

Julie Huntsinger

Julie Huntsinger
Executive Director
Telluride Film Festival
(510) 665-9494
juliehuntsinger@mac.c
om

<E&O Invoice - Choices.pdf>

<2700815_9.pdf>

From: Tom McGuire tmcguire@wmeentertainment.com
Subject: RE: amazing grace confirmation
Date: April 21, 2016 at 1:46 PM
To: alan elliott (ucla) alanelliott@g.ucla.edu, Todd W. Musburger todd@musburger.com, Liesl Copland LCopland@wmeentertainment.com

Tell me in English what this says

Tom McGuire | WME
TMcGuire@wmeentertainment.com
310.248.3022

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Thursday, April 21, 2016 1:39 PM
To: Todd W. Musburger; Tom McGuire; Liesl Copland
Subject: Fwd: amazing grace confirmation

thank you.

-alan

phone: 323 988 9692
peace and love.

<http://songsoundrecord.tumblr.com>

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Subject: RE: amazing grace confirmation
Date: April 21, 2016 at 1:30:17 PM PDT
To: "alan elliott (ucla)" <alanelliott@g.ucla.edu>

Hi Alan,

Attached is a copy of Amazing Grace, LLC.'s Errors & Omissions' policy for "Amazing Grace" for the July 21, 2015 to July 21, 2018 policy term. We have reviewed this policy and determined it is consistent with the coverage bound. It is very important that you also carefully review this policy and let me know if you have any questions or concerns.

Also attached is endorsement # 10, deleting the Failure to Obtain License exclusion from the policy.

We apologize for the delay in getting this policy to you.

Regards,

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

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Re: amazing grace confirmation
Date: April 21, 2016 at 1:51 PM
To: Tom McGuire TMcGuire@wmeentertainment.com
Cc: Todd W. Musburger todd@musburger.com, Liesl Copland LCopland@wmeentertainment.com



i dunno.

it came to me out of the blue- i just thought todd or you had needed something from the insurance and so... i passed it froward.

thank you.

-alan

phone: 323 988 9692
peace and love.

<http://songsoundrecord.tumblr.com>

On Apr 21, 2016, at 1:46 PM, Tom McGuire <TMcGuire@wmeentertainment.com> wrote:

Tell me in English what this says

Tom McGuire | WME
TMcGuire@wmeentertainment.com
310.248.3022

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Thursday, April 21, 2016 1:39 PM
To: Todd W. Musburger; Tom McGuire; Liesl Copland
Subject: Fwd: amazing grace confirmation

thank you.

-alan

phone: 323 988 9692
peace and love.

<http://songsoundrecord.tumblr.com>

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Subject: RE: amazing grace confirmation
Date: April 21, 2016 at 1:30:17 PM PDT
To: "alan elliott (ucla)" <alanelliott@g.ucla.edu>

TO: alan emott (ucia) <alanemott@y.ucia.edu>

Hi Alan,

Attached is a copy of Amazing Grace, LLC.'s Errors & Omissions' policy for "Amazing Grace" for the July 21, 2015 to July 21, 2018 policy term. We have reviewed this policy and determined it is consistent with the coverage bound. It is very important that you also carefully review this policy and let me know if you have any questions or concerns.

Also attached is endorsement # 10, deleting the Failure to Obtain License exclusion from the policy.

We apologize for the delay in getting this policy to you.

Regards,

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

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

This message is intended only for the named recipient and may contain confidential, proprietary or legally privileged information. Unauthorized individuals or entities are not permitted access to this information. Any dissemination, distribution, or copying of this information is strictly prohibited. If you have received this message in error, please advise the sender by reply e-mail, and delete this message and any attachments.

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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

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

they will get you paid today!

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.

On Jul 14, 2015, at 6:30 AM, Annette Shavuo <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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

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



thank you.

-alan

phone: 323 988 9692

This email 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.



E&O Invoice -
Choices.pdf

74 KB

From: alan elliott (ucla) alanelliott@g.ucla.edu

Subject: Re: amazing grace confirmation

Date: July 14, 2015 at 11:15 AM

To: Amanda Roytbak amanda.roytbak@aon.com

Cc: Annette Shavuo annette.shavuo@aon.com, Stephen Carroll stephen.carroll@aon.com, Todd W. Musburger todd@musburger.com, Julie Huntsinger juliehuntsinger@me.com



hi

please bill directly to:

Julie Huntsinger
Executive Director
Telluride Film Festival
(510) 665-9494
juliehuntsinger@mac.com

julie iss cc'd here.

thank you.

-alan

phone: 323 988 9692

This email 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.

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

please bill directly to:

Julie Huntsinger
Executive Director
Telluride Film Festival
(510) 665-9494
juliehuntsinger@mac.com

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Re: amazing grace confirmation
Date: July 15, 2015 at 10:16 AM
To: Annette Shavuo annette.shavuo@aon.com
Cc: Stephen Carroll stephen.carroll@aon.com, Todd W. Musburger todd@musburger.com, Amanda Roytbak amanda.roytbak@aon.com



good morning

checking to see that this is on it's path to being bound. please let me know.

thank you.

-alan

phone: 323 988 9692

This email 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.

On Jul 14, 2015, at 9:26 AM, Annette Shavuo <annette.shavuo@aon.com> wrote:

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

Before you print, think about the ENVIRONMENT 🌱

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

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
juliehuntsinger@mac.com

they will get you paid today!

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.

On Jul 14, 2015, at 6:30 AM, Annette Shavuo <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

Before you print, think about the ENVIRONMENT 🌱

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

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

<image001.jpg>

thank you.

-alan

phone: 323 988 9692

This email 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.

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Fwd: amazing grace confirmation
Date: July 15, 2015 at 6:56 PM
To: Julie Huntsinger juliehuntsinger@me.com



hey Julie

checking to see if this is en route...

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.

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Date: July 15, 2015 at 11:14:25 AM PDT
To: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Cc: Stephen Carroll <stephen.carroll@aon.com>, "Todd W. Musburger" <todd@musburger.com>, Amanda Roytbak <amanda.roytbak@aon.com>
Subject: RE: amazing grace confirmation

Alan,

Once we receive the check, we will request to bind coverage.

Amanda sent the invoice yesterday.

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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Wednesday, July 15, 2015 1:17 PM

Sent: Wednesday, July 15, 2015 1:17 PM

To: Annette Shavuo

Cc: Stephen Carroll; Todd W. Musburger; Amanda Roytbak

Subject: Re: amazing grace confirmation

good morning

checking to see that this is on it's path to being bound. please let me know.

thank you.

-alan

phone: 323 988 9692

This email 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.

On Jul 14, 2015, at 9:26 AM, Annette Shavuo <annette.shavuo@aon.com> wrote:

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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

From: alan elliott (ucla) [<mailto:alanelliott@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
juliehuntsinger@mac.com

they will get you paid today!

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.

On Jul 14, 2015, at 6:30 AM, Annette Shavuo <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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

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

<image001.jpg>

thank you.

-alan

phone: 323 988 9692

This email 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.

From: Julie Huntsinger juliehuntsinger@me.com
Subject: Re: amazing grace confirmation
Date: July 15, 2015 at 6:57 PM
To: alan elliott (ucla) alanelliott@g.ucla.edu



we only got the invoice yesterday!
we issue checks thursday so it will go out tomorrow

On Jul 15, 2015, at 6:56 PM, alan elliott (ucla) <alanelliott@g.ucla.edu> wrote:

hey Julie

checking to see if this is en route...

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.

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Date: July 15, 2015 at 11:14:25 AM PDT
To: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Cc: Stephen Carroll <stephen.carroll@aon.com>, "Todd W. Musburger" <todd@musburger.com>, Amanda Roytbak <amanda.roytbak@aon.com>
Subject: RE: amazing grace confirmation

Alan,

Once we receive the check, we will request to bind coverage.

Amanda sent the invoice yesterday.

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

Before you print, think about the ENVIRONMENT

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Wednesday, July 15, 2015 1:17 PM
To: Annette Shavuo
Cc: Stephen Carroll; Todd W. Musburger; Amanda Roytbak
Subject: Re: amazing grace confirmation

good morning

checking to see that this is on it's path to being bound. please let me know.

thank you.

-alan

phone: 323 988 9692

This email 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.

On Jul 14, 2015, at 9:26 AM, Annette Shavuo <annette.shavuo@aon.com> wrote:

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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

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

they will get you paid today!

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.

On Jul 14, 2015, at 6:30 AM, Annette Shavuo <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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

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

<image001.jpg>

thank you.

-alan

phone: 323 988 9692

This email 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@alaneliott.net.

From: alan elliott (ucla) <alanelliott@g.ucla.edu>
Subject: Fwd: amazing grace confirmation
Date: July 15, 2015 at 7:19 PM
To: Todd W. Musburger <todd@musburger.com>



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.

Begin forwarded message:

From: Julie Huntsinger <juliehuntsinger@me.com>
Date: July 15, 2015 at 6:57:41 PM PDT
To: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Subject: Re: amazing grace confirmation

we only got the invoice yesterday!

we issue checks thursday so it will go out tomorrow

On Jul 15, 2015, at 6:56 PM, alan elliott (ucla) <alanelliott@g.ucla.edu> wrote:

hey Julie

checking to see if this is en route...

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.

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Date: July 15, 2015 at 11:14:25 AM PDT
To: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Cc: Stephen Carroll <stephen.carroll@aon.com>, "Todd W. Musburger" <todd@musburger.com>, Amanda Roytbak <amanda.roytbak@aon.com>
Subject: RE: amazing grace confirmation

Alan,

Once we receive the check, we will request to bind coverage.

Amanda sent the invoice yesterday.

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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Wednesday, July 15, 2015 1:17 PM
To: Annette Shavuo
Cc: Stephen Carroll; Todd W. Musburger; Amanda Roytbak
Subject: Re: amazing grace confirmation

good morning

checking to see that this is on it's path to being bound. please let me know.

thank you.

-alan

phone: 323 988 9692

This email 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.

On Jul 14, 2015, at 9:26 AM, Annette Shavuo <annette.shavuo@aon.com>
wrote:

Alan,

Amanda will send an invoice shortlv.

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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

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

they will get you paid today!

thank you.

phone: 323 988 9692

PHONE: 627 7400 3024

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.

On Jul 14, 2015, at 6:30 AM, Annette Shavuo <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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

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

in Stephen and Anneke 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

<image001.jpg>

thank you.

-alan

phone: 323 988 9692

This email 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.

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Fwd: amazing grace confirmation e&o
Date: March 15, 2016 at 2:58 PM
To: Todd W. Musburger todd@musburger.com, Tom McGuire tmcguire@wmeentertainment.com



Begin forwarded message:

From: Julie Huntsinger <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>

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
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> wrote:

hey Julie

Can you pls see if this is en route?

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.

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Date: July 20, 2015 at 1:27:21 PM PDT
To: "alanelliott@g.ucla.edu" <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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

From: Amanda Roytbak
Sent: Tuesday, July 14, 2015 2:31 PM
To: 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

This message is intended only for the named recipient and may contain confidential, proprietary or legally privileged information. Unauthorized individuals or entities are not permitted access to this information. Any dissemination, distribution, or copying of this information is strictly prohibited. If you have received this message in error, please advise the sender by reply e-mail, and delete this message and any attachments.

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
juliehuntsinger@mac.com

julie iss cc'd here.

thank you.

-alan

phone: 323 988 9692

This email 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.

On Jul 14, 2015, at 11:13 AM, Amanda Roytbak <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

<E&O Invoice - Choices.pdf>



2700815_9.pdf

From: alan elliott (ucla) alanelliott@g.ucla.edu 

Subject: amazing grace confirmation

Date: July 13, 2015 at 2:01 PM

To: Stephen Carroll Stephen.carroll@aon.com, Annette Shavuo annette.shavuo@aon.com

Cc: Todd W. Musburger todd@musburger.com



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



thank you.

-alan

phone: 323 988 9692

This email 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.

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Fwd: amazing grace coverage
Date: July 20, 2015 at 7:25 AM
To: Julie Huntsinger juliehuntsinger@me.com



can you pls see if the check made its way east...

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.

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Date: July 20, 2015 at 7:15:35 AM PDT
To: "alan elliott (ucla)" <alanelliott@g.ucla.edu>, Stephen Carroll <stephen.carroll@aon.com>
Subject: RE: amazing grace coverage

Alan,

Check was not received. Maybe later when we receive the mail.

What address did you send it to?

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

Before you print, think about the ENVIRONMENT 🌱

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Monday, July 20, 2015 9:54 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



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.

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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Re: amazing grace coverage
Date: July 20, 2015 at 7:25 AM
To: Annette Shavuo annette.shavuo@aon.com
Cc: Stephen Carroll stephen.carroll@aon.com



I will ask.

is there another way to pay directly?

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.

On Jul 20, 2015, at 7:15 AM, Annette Shavuo <annette.shavuo@aon.com> wrote:

Alan,

Check was not received. Maybe later when we receive the mail.

What address did you send it to?

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

Before you print, think about the ENVIRONMENT 🌱

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Monday, July 20, 2015 9:54 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 esp the new bond coverage (without the exclusion for the corrected #??

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



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.

From: Annette Shavuo 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, Stephen Carroll 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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

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



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

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.

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: amazing grace coverage
Date: July 20, 2015 at 6:53 AM
To: Stephen Carroll stephen.carroll@aon.com, Annette Shavuo annette.shavuo@aon.com



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



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.

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: amazing grace coverage
Date: March 23, 2015 at 6:34 AM
To: Stephen Carroll stephen.carroll@aon.com



hey stephen

I need to get coverage on the "consents" for all that are on screen- from Aretha Franklin to the choir to the band.

I have separate releases for each- including Aretha's personal service contract with warner brothers.

can we get on the phone today with the insurance company so we can get that going please?

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.

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Fwd: amazing grace follow up
Date: February 2, 2016 at 7:09 PM
To: Annette Shavuo annette.shavuo@aon.com



hello annette

i sent the below to stephen and got a response that he is on vacation. can you please let me know where this stands.

thank you.

-alan

phone: 323 988 9692
peace and love.

<http://songsoundrecord.tumblr.com>

Begin forwarded message:

From: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Subject: amazing grace follow up
Date: February 2, 2016 at 4:00:15 PM PST
To: Stephen Carroll <stephen.carroll@aon.com>
Cc: "Todd W. Musburger" <todd@musburger.com>

hi stephen

where are we at re: reinstating insurance?

thank you.

-alan

phone: [323 988 9692](tel:3239889692)
peace and love.

From: Todd Musburger todd@musburger.com
Subject: Re: amazing grace follow up
Date: February 3, 2016 at 9:49 AM
To:
Cc: alan elliott (ucla) alanelliott@g.ucla.edu



This all changes with AF's signature...

IPhone Transmission Please excuse Typos & Peculiar abbreviations

On Feb 3, 2016, at 11:44 AM, Stephen Carroll <stephen.carroll@aon.com> wrote:

The answer re Aretha was a firm no. I don't know what we can do. I will call u when I return next week

From: alan elliott (ucla)
Sent: Tuesday, February 02, 2016 7:00:15 PM
To: Stephen Carroll
Cc: Todd W. Musburger
Subject: amazing grace follow up

hi stephen

where are we at re: reinstating insurance?

thank you.

-alan

phone: [323 988 9692](tel:3239889692)
peace and love.

From: Todd Musburger todd@musburger.com
Subject: Re: amazing grace follow up
Date: February 18, 2016 at 8:57 AM
To: Stephen Carroll stephen.carroll@aon.com
Cc: alan elliott (ucla) alanelliott@g.ucla.edu



Hello Stephen: I am one of the attorneys working with Alan Elliott regarding the Aretha Franklin concert footage project. I have been asked to provide some answers to coverage questions that have arisen and I would like to set a call with you today or tomorrow...Please let me know what would work for you...Thanks,
Todd

Todd W. Musburger
Todd W. Musburger, Ltd.
142 E. Ontario
Suite 500
Chicago, Illinois 60611
312 664 2600

On Wed, Feb 3, 2016 at 11:44 AM, Stephen Carroll <stephen.carroll@aon.com> wrote:
The answer re Aretha was a firm no. I don't know what we can do. I will call u when I return next week

From: alan elliott (ucla)
Sent: Tuesday, February 02, 2016 7:00:15 PM
To: Stephen Carroll
Cc: Todd W. Musburger
Subject: amazing grace follow up

hi stephen

where are we at re: reinstating insurance?

thank you.

-alan

phone: [323 988 9692](tel:3239889692)
peace and love.

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: amazing grace follow up
Date: February 2, 2016 at 4:00 PM
To: Stephen Carroll stephen.carroll@aon.com
Cc: Todd W. Musburger todd@musburger.com



hi stephen

where are we at re: reinstating insurance?

thank you.

-alan

phone: [323 988 9692](tel:3239889692)
peace and love.

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Re: Amazing Grace insurance
Date: May 25, 2015 at 6:05 AM
To: Joanne.Richardson@Hiscox.com



hi joanna

is it possible to talk with you on tuesday to start to go over this quote?



Amazing Grace
Hiscox...te.PDF

thank you.

-alan

phone: 323 988 9692

This email 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.

On Mar 4, 2015, at 12:25 PM, Stephen Carroll <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



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.

On Feb 27, 2015, at 1:42 PM, Stephen Carroll <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
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> 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
Cell: 914-589-2474
Fax: 847-953-2692

<Amazing Grace Hiscox Quote.PDF>

From: Richardson Joanne Joanne.Richardson@Hiscox.com 
Subject: RE: Amazing Grace insurance
Date: May 26, 2015 at 8:17 AM
To: alan elliott (ucla) alanelliott@g.ucla.edu

RJ

Sure, I'm in all day. 646-452-2355

Call me when you are ready.

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



From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Monday, May 25, 2015 9:06 AM
To: Richardson Joanne
Subject: Re: Amazing Grace insurance

hi joanna

is it possible to talk with you on tuesday to start to go over this quote?

thank you.

-alan

phone: 323 988 9692

This email 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.

On Mar 4, 2015, at 12:25 PM, Stephen Carroll <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

Error! Filename not specified.

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.

On Feb 27, 2015, at 1:42 PM, Stephen Carroll <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
Cell: 914-589-2474
Fax: 847-953-2692

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

From Ramona V. Horne (cc) [mailto:ramona@graceusa.com]

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> 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
Cell: 914-589-2474
Fax: 847-953-2692

<Amazing Grace Hiscox Quote.PDF>

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. No one else is authorised to distribute, forward, print, copy or act upon any information contained in this email. If you have received this email in error, please notify the sender.

Hiscox Syndicates Ltd and Hiscox Insurance Company Ltd are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority. Hiscox Underwriting Limited, Hiscox Europe Underwriting Limited and Hiscox ASM Limited are authorised and regulated by the Financial Conduct Authority. Hiscox plc is a company registered in England and Wales under company registration number 2837811 and registered office at 1 Great St Helen's, London EC3A 6HX.

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Re: Amazing Grace insurance
Date: May 26, 2015 at 9:13 AM
To: Richardson Joanne Joanne.Richardson@Hiscox.com



awesome

just left a vm

pls call when you get free

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.

On May 26, 2015, at 8:17 AM, Richardson Joanne <Joanne.Richardson@Hiscox.com> wrote:

Sure, I'm in all day. 646-452-2355

Call me when you are ready.

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

<image001.png>

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Monday, May 25, 2015 9:06 AM
To: Richardson Joanne
Subject: Re: Amazing Grace insurance

hi joanna

is it possible to talk with you on tuesday to start to go over this quote?

thank you.

-alan

phone: 323 988 9692

This email 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.

On Mar 4, 2015, at 12:25 PM, Stephen Carroll <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

Error! Filename not specified.

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.

On Feb 27, 2015, at 1:42 PM, Stephen Carroll <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
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> 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 was

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
Cell: 914-589-2474
Fax: 847-953-2692

<Amazing Grace Hiscox Quote.PDF>

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. No one else is authorised to distribute, forward, print, copy or act upon any information contained in this email. If you have received this email in error, please notify the sender.

Hiscox Syndicates Ltd and Hiscox Insurance Company Ltd are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority. Hiscox Underwriting Limited, Hiscox Europe Underwriting Limited and Hiscox ASM Limited are authorised and regulated by the Financial Conduct Authority. Hiscox plc is a company registered in England and Wales under company registration number 2837811 and registered office at 1 Great St Helen's, London EC3A 6HX.



From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Re: Amazing Grace insurance
Date: May 26, 2015 at 12:27 PM
To: Richardson Joanne Joanne.Richardson@Hiscox.com
Cc: Todd W. Musburger todd@musburger.com



hi joanne

as discussed, here is the contract:



on page 2 is an indemnification clause from atlantic records to warner seven arts (from whom i have quitclaim of the film) and i would like to make sure that should any litigation arise, the insurance company will go to atlantic records (and not me).

thank you.

-alan

phone: 323 988 9692

This email 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.

On May 26, 2015, at 9:16 AM, Richardson Joanne <Joanne.Richardson@Hiscox.com> wrote:

Will do. On a call now

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

<image001.png>

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Tuesday, May 26, 2015 12:14 PM
To: Richardson Joanne
Subject: Re: Amazing Grace insurance

awesome

just left a vm

pls call when you get free

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.

On May 26, 2015, at 8:17 AM, Richardson Joanne <Joanne.Richardson@Hiscox.com> wrote:

Sure, I'm in all day. 646-452-2355

Call me when you are ready.

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

<image001.png>

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

Sent: Monday, May 25, 2015 9:06 AM

To: Richardson Joanne

Subject: Re: Amazing Grace insurance

hi joanna

is it possible to talk with you on tuesday to start to go over this quote?

thank you.

-alan

phone: 323 988 9692

This email 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.

On Mar 4, 2015, at 12:25 PM, Stephen Carroll
<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

Error! Filename not specified.

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.

On Feb 27, 2015, at 1:42 PM, Stephen Carroll

On Feb 27, 2015, at 1:42 PM, Stephen Carroll
<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
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>
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
Cell: 914-589-2474
Fax: 847-953-2692

<Amazing Grace Hiscox Quote.PDF>

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. No one else is authorised to distribute, forward, print, copy or act upon any information contained in this email. If you have received this email in error, please notify the sender.

Hiscox Syndicates Ltd and Hiscox Insurance Company Ltd are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority. Hiscox Underwriting Limited, Hiscox Europe Underwriting Limited and Hiscox ASM Limited are authorised and regulated by the Financial Conduct Authority. Hiscox plc is a company registered in England and Wales under company registration number 2837811 and registered office at 1 Great St Helen's, London EC3A 6HX.

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. No one else is authorised to distribute, forward, print, copy or act upon any information contained in this email. If you have received this email in error, please notify the sender.

Hiscox Syndicates Ltd and Hiscox Insurance Company Ltd are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority. Hiscox Underwriting Limited, Hiscox Europe Underwriting Limited and Hiscox ASM Limited are authorised and regulated by the Financial Conduct Authority. Hiscox plc is a company registered in England and Wales under company registration number 2837811 and registered office at 1 Great St Helen's, London EC3A 6HX.

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Re: Amazing Grace insurance
Date: June 1, 2015 at 7:18 AM
To: Richardson Joanne Joanne.Richardson@Hiscox.com
Cc: Todd W. Musburger todd@musburger.com



hi joanne

let me see if the below information helps provide context. Below is the timeline for "amazing Grace" preceded by the film's backstory and followed by law in New York state which applies specifically to the "personal service contract":

the backstory:

in 1972, wb films, relying upon Aretha's "personal service contract" with the film company specifically, made "amazing grace"- a documentary film of the recording of the album of the same name, the movie which Aretha knew of, participated in and which she subsequently went on to support and use in other film projects which she produced ("American masters").

the release of the documentary was either to be a feature film or a television special and was intended and the film is made mention of inside the filming (and on the album) and the movie is publicized via the album's liner notes.

however... the movie was unable to be finished due to a technical problem (syncing audio and video- a problem in 1972 which the production could not correct). this, only 153 mins of the 20+hours of shooting were able to be put together.

of this available film that was synced, wb used the 153 minutes in at least two films:

"Atlantic 25" in 1973

"American masters" in 1986

both films are produced by wb films or a subsidiary and feature usable footage from the 153 mins of footage. "American masters" was produced by ms. franklin from avision (a wb partnership between Atlantic records and warner home video).

the "personal service contract":

ms franklin wanted after her initial contract in 1967 that is directly with Atlantic records, to be in films.

unlike any other recording agreements through the warner/atlantic records from the time that we have found, ms. franklin's 1968 "personal service agreement" was executed by the film company (warner 7 arts) and is specifically between both the film company (warner 7 arts- from whom i gained the quitclaim) AND atlantic records. all other examples we have found are between atlantic recording and the artist- and are without the film company

ms. franklin's agreement differs from other typical recording agreements in that it engages ms. franklin "exclusive personal services during the term hereof in connection with the production of phonograph records."

language found in all other examples we have found reads, "ARTIST'S exclusive personal services as a recording artist in connection with the production of records"- a subtle difference (this is what john calley, president of wb films, and joe Boyd, whose job it was to secure all releases, relied on and the reason they claim wb did not gain a separate release. (mr Calley has died but we have a letter stating these facts from mr Boyd which we can provide.

New York law:

in 2002, New York State held in greenfield vs philles:

"Plaintiffs contend that the breadth of the ownership provision is limited by the agreement's introductory paragraph, which states that defendants' purpose for purchasing plaintiffs' performances was to make "phonograph records and/or tape recordings and other similar devices." However, when read in conjunction with the ownership provision, a reasonable meaning emerges -- the phrase "other similar devices" refers to defendants' right to reproduce the performances by any current or future technological methods." (see below please.)

my timeline is as such:

in 2007, wb gave me quitclaim.

in 2010, technology allowed for sync between the film with the audio.

with regards to this, I'd like counsel to review this:

https://www.law.cornell.edu/nyctap/l02_0118.htm

it is New York law and both ms franklins contract is in New York and warner seven arts is registered in New York.

thank you.

phone: 323 988 9692

Sent from a iPhone



This email may have been dictated into the iPhone so please forgive the mistakes in transmission including any previous messages

This e-mail may have been created into the Internet, so please forgive the occasional 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.

On Jun 1, 2015, at 6:52 AM, Richardson Joanne <Joanne.Richardson@Hiscox.com> wrote:

Alan, the following comments came back from our film clearance attorney (below). Can you please respond to these questions first.

I've reviewed the application, the contracts and the emails you sent me. The recording contract is for personal services but is for making records. I'm not sure what the assignment gives Warner Bros Seven Arts. The questions I have relate to whether all the necessary rights in the documentary are clear (individual releases, crowds, clips, photos, music etc.), Also, what is the deal the producer has with the original producer and have they checked out the chain of title to the film.

Joanne

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Tuesday, May 26, 2015 3:28 PM
To: Richardson Joanne
Cc: Todd W. Musburger
Subject: Re: Amazing Grace insurance

hi joanne

as discussed, here is the contract:

on page 2 is an indemnification clause from atlantic records to warner seven arts (from whom i have quitclaim of the film) and i would like to make sure that should any litigation arise, the insurance company will go to atlantic records (and not me).

thank you.

-alan

phone: 323 988 9692

This email 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.

On May 26, 2015, at 9:16 AM, Richardson Joanne
<Joanne.Richardson@Hiscox.com> wrote:

Will do. On a call now

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

<image001.png>

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Tuesday, May 26, 2015 12:14 PM
To: Richardson Joanne
Subject: Re: Amazing Grace insurance

awesome

just left a vm

pls call when you get free

thank you.

phone: 323 988 9692

Sent from a iPhone

Error! Filename not specified.

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.

On May 26, 2015, at 8:17 AM, Richardson Joanne
<Joanne.Richardson@Hiscox.com> wrote:

Sure, I'm in all day. 646-452-2355

Call me when you are ready.

Joanne Richardson, CPCU
Media & Entertainment Practice Leader
Hiscox Partner
Hiscox USA

T 646.452.2355
M 646.823.8092
joanne.richardson@hiscox.com
Connect with Hiscox online
Web www.hiscoxbroker.com
Twitter [@Hiscox_USA](https://twitter.com/Hiscox_USA)

<image001.png>

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Monday, May 25, 2015 9:06 AM
To: Richardson Joanne
Subject: Re: Amazing Grace insurance

hi joanna

is it possible to talk with you on tuesday to start to go over this quote?

thank you.

-alan

phone: 323 988 9692

This email 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.

On Mar 4, 2015, at 12:25 PM, Stephen Carroll
<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

Error! Filename not specified.

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.

On Feb 27, 2015, at 1:42 PM, Stephen Carroll
<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
Cell: 914-589-2474
Fax: 847-953-2692

From: alan elliott (ucla)

[\[mailto:aianeliott@g.ucla.edu\]](mailto:aianeliott@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>
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?

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
Cell: 914-589-2474
Fax: 847-953-2692

<Amazing Grace Hiscox Quote.PDF>

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. No one else is authorised to distribute, forward, print, copy or act upon any information contained in this email. If you have received this email in error, please notify the sender.

Hiscox Syndicates Ltd and Hiscox Insurance Company Ltd are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority. Hiscox Underwriting Limited, Hiscox Europe Underwriting Limited and Hiscox ASM Limited are authorised and regulated by the Financial Conduct Authority. Hiscox plc is a company registered in England and Wales under company registration number 2837811 and registered office at 1 Great St Helen's, London EC3A 6HX.

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. No one else is authorised to distribute, forward, print, copy or act upon any information contained in this email. If you have received this email in error, please notify the sender.

Hiscox Syndicates Ltd and Hiscox Insurance Company Ltd are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority. Hiscox Underwriting Limited, Hiscox Europe Underwriting Limited and Hiscox ASM Limited are authorised and regulated by the Financial Conduct Authority. Hiscox plc is a company registered in England and Wales under company registration number 2837811 and registered office at 1 Great St Helen's, London EC3A 6HX.

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. No one else is authorised to distribute, forward, print, copy or act upon any information contained in this email. If you have received this email in error, please notify the sender.

Hiscox Syndicates Ltd and Hiscox Insurance Company Ltd are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority. Hiscox Underwriting Limited, Hiscox Europe Underwriting Limited and Hiscox ASM Limited are authorised and regulated by the Financial Conduct Authority. Hiscox plc is a company registered in England and Wales under company registration number 2837811 and registered office at 1 Great St Helen's, London EC3A 6HX.

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Re: Amazing Grace insurance
Date: June 22, 2015 at 4:33 PM
To: Richardson Joanne Joanne.Richardson@Hiscox.com
Cc: Todd W. Musburger todd@musburger.com



hi joanne

i talked with ted gerdes who tells me that according to his recommendation, the indemnification clause in the contract in question IS covered.

can we please discuss tomorrow so we can get moving down the line.

thank you.

-alan

phone: 323 988 9692

This email 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.

On Jun 1, 2015, at 6:52 AM, Richardson Joanne <Joanne.Richardson@Hiscox.com> wrote:

Alan, the following comments came back from our film clearance attorney (below). Can you please respond to these questions first.

I've reviewed the application, the contracts and the emails you sent me. The recording contract is for personal services but is for making records. I'm not sure what the assignment gives Warner Bros Seven Arts. The questions I have relate to whether all the necessary rights in the documentary are clear (individual releases, crowds, clips, photos, music etc.), Also, what is the deal the producer has with the original producer and have they checked out the chain of title to the film.

Joanne

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Tuesday, May 26, 2015 3:28 PM
To: Richardson Joanne
Cc: Todd W. Musburger
Subject: Re: Amazing Grace insurance

hi joanne

as discussed, here is the contract:

on page 2 is an indemnification clause from atlantic records to warner seven arts (from whom i have quitclaim of the film) and i would like to make sure that should any litigation arise, the insurance company will go to atlantic records (and not me).

thank you.

-alan

phone: 323 988 9692

This email 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.

On May 26, 2015, at 9:16 AM, Richardson Joanne
<Joanne.Richardson@Hiscox.com> wrote:

Will do. On a call now

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

<image001.png>

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Tuesday, May 26, 2015 12:14 PM
To: Richardson Joanne
Subject: Re: Amazing Grace insurance

awesome

just left a vm

pls call when you get free

thank you.

phone: 323 988 9692

Sent from a iPhone

Error! Filename not specified.

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.

On May 26, 2015, at 8:17 AM, Richardson Joanne
<Joanne.Richardson@Hiscox.com> wrote:

Sure, I'm in all day. 646-452-2355

Call me when you are ready.

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

<image001.png>

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Monday, May 25, 2015 9:06 AM
To: Richardson Joanne
Subject: Re: Amazing Grace insurance

hi joanna

is it possible to talk with you on tuesday to start to go over this quote?

thank you.

-alan

phone: 323 988 9692

This email 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.

On Mar 4, 2015. at 12:25 PM. Stephen Carroll

<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

Error! Filename not specified.

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.

On Feb 27, 2015, at 1:42 PM, Stephen Carroll

<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
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>
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
Cell: 914-589-2474
Fax: 847-953-2692

<Amazing Grace Hiscox Quote.PDF>

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. No one else is authorised to distribute, forward, print, copy or act upon any information contained in this email. If you have received this email in error, please notify the sender.

Hiscox Syndicates Ltd and Hiscox Insurance Company Ltd are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority. Hiscox Underwriting Limited, Hiscox Europe Underwriting Limited and Hiscox ASM Limited are authorised and regulated by the Financial Conduct Authority. Hiscox plc is a company registered in England and Wales under company registration number 2837811 and registered office at 1 Great St Helen's, London EC3A 6HX.

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. No one else is authorised to distribute, forward, print, copy or act upon any information contained in this email. If you have received this email in error, please notify the sender.

.....

Hiscox Syndicates Ltd and Hiscox Insurance Company Ltd are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority. Hiscox Underwriting Limited, Hiscox Europe Underwriting Limited and Hiscox ASM Limited are authorised and regulated by the Financial Conduct Authority. Hiscox plc is a company registered in England and Wales under company registration number 2837811 and registered office at 1 Great St Helen's, London EC3A 6HX.

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. No one else is authorised to distribute, forward, print, copy or act upon any information contained in this email. If you have received this email in error, please notify the sender.

Hiscox Syndicates Ltd and Hiscox Insurance Company Ltd are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority. Hiscox Underwriting Limited, Hiscox Europe Underwriting Limited and Hiscox ASM Limited are authorised and regulated by the Financial Conduct Authority. Hiscox plc is a company registered in England and Wales under company registration number 2837811 and registered office at 1 Great St Helen's, London EC3A 6HX.

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Re: Amazing Grace insurance
Date: July 1, 2015 at 6:53 AM
To: Richardson Joanne Joanne.Richardson@Hiscox.com



hi Joanne

are you around at 1030am pst today possibly?

please let me 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.

On Jun 1, 2015, at 6:52 AM, Richardson Joanne <Joanne.Richardson@Hiscox.com> wrote:

Alan, the following comments came back from our film clearance attorney (below). Can you please respond to these questions first.

I've reviewed the application, the contracts and the emails you sent me. The recording contract is for personal services but is for making records. I'm not sure what the assignment gives Warner Bros Seven Arts. The questions I have relate to whether all the necessary rights in the documentary are clear (individual releases, crowds, clips, photos, music etc.), Also, what is the deal the producer has with the original producer and have they checked out the chain of title to the film.

Joanne

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Tuesday, May 26, 2015 3:28 PM
To: Richardson Joanne
Cc: Todd W. Musburger
Subject: Re: Amazing Grace insurance

hi joanne

as discussed, here is the contract:

on page 2 is an indemnification clause from atlantic records to warner seven arts (from whom i have quitclaim of the film) and i would like to make sure that should any litigation arise, the insurance company will go to atlantic records (and not me).

thank you.

-alan

phone: 323 988 9692

This email 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.

On May 26, 2015, at 9:16 AM, Richardson Joanne
<Joanne.Richardson@Hiscox.com> wrote:

Will do. On a call now

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

<image001.png>

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Tuesday, May 26, 2015 12:14 PM
To: Richardson Joanne
Subject: Re: Amazing Grace insurance

awesome

just left a vm

pls call when you get free

thank you.

phone: 323 988 9692

Sent from a iPhone

Error! Filename not specified.

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

making use of it in any manner (all of which acts are strictly prohibited), and so notify the sender by reply info@alanelliott.net.

On May 26, 2015, at 8:17 AM, Richardson Joanne
<Joanne.Richardson@Hiscox.com> wrote:

Sure, I'm in all day. 646-452-2355

Call me when you are ready.

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

<image001.png>

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

Sent: Monday, May 25, 2015 9:06 AM

To: Richardson Joanne

Subject: Re: Amazing Grace insurance

hi joanna

is it possible to talk with you on tuesday to start to go over this quote?

thank you.

-alan

phone: 323 988 9692

This email 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.

On Mar 4, 2015, at 12:25 PM, Stephen Carroll

<stephen.carroll@aon.com> wrote:

Here is the quote from Hiscox I am waiting on

Here is the quote from Mikeex: 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

Error! Filename not specified.

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.

On Feb 27, 2015, at 1:42 PM, Stephen Carroll
<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
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>
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
Cell: 914-589-2474
Fax: 847-953-2692

<Amazing Grace Hiscox Quote.PDF>

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. No one else is authorised to distribute, forward, print, copy or act upon any information contained in this email. If you have received this email in error, please notify the sender.

Hiscox Syndicates Ltd and Hiscox Insurance Company Ltd are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority. Hiscox Underwriting Limited, Hiscox Europe Underwriting Limited and Hiscox ASM Limited are authorised and regulated by the Financial Conduct Authority. Hiscox plc is a company registered in England and Wales under company registration number 2837811 and registered office at 1 Great St Helen's, London EC3A 6HX.

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. No one else is authorised to distribute, forward, print, copy or act upon any information contained in this email. If you have received this email in error, please notify the sender.

Hiscox Syndicates Ltd and Hiscox Insurance Company Ltd are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority. Hiscox Underwriting

.....
Limited, Hiscox Europe Underwriting Limited and Hiscox ASM Limited are authorised and regulated by the Financial Conduct Authority. Hiscox plc is a company registered in England and Wales under company registration number 2837811 and registered office at 1 Great St Helen's, London EC3A 6HX.

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. No one else is authorised to distribute, forward, print, copy or act upon any information contained in this email. If you have received this email in error, please notify the sender.

Hiscox Syndicates Ltd and Hiscox Insurance Company Ltd are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority. Hiscox Underwriting Limited, Hiscox Europe Underwriting Limited and Hiscox ASM Limited are authorised and regulated by the Financial Conduct Authority. Hiscox plc is a company registered in England and Wales under company registration number 2837811 and registered office at 1 Great St Helen's, London EC3A 6HX.

From: Richardson Joanne Joanne.Richardson@Hiscox.com
Subject: Re: Amazing Grace insurance
Date: July 1, 2015 at 6:56 AM
To: alanelliott@g.ucla.edu



Sorry, I'm out today and not available for a call but that time works for me tomorrow. Let me know

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Wednesday, July 01, 2015 09:53 AM
To: Richardson Joanne
Subject: Re: Amazing Grace insurance

hi Joanne

are you around at 1030am pst today possibly?

please let me 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.

On Jun 1, 2015, at 6:52 AM, Richardson Joanne <Joanne.Richardson@Hiscox.com> wrote:

Alan, the following comments came back from our film clearance attorney (below). Can you please respond to these questions first.

I've reviewed the application, the contracts and the emails you sent me. The recording contract is for personal services but is for making records. I'm not sure what the assignment gives Warner Bros Seven Arts. The questions I have relate to whether all the necessary rights in the documentary are clear (individual releases, crowds, clips, photos, music etc.), Also, what is the deal the producer has with the original producer and have they checked out the chain of title to the film.

Joanne

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Tuesday, May 26, 2015 3:28 PM
To: Richardson Joanne
Cc: Todd W. Musburger
Subject: Re: Amazing Grace insurance

hi joanne

as discussed, here is the contract:

on page 2 is an indemnification clause from atlantic records to warner seven arts (from whom i have quitclaim of the film) and i would like to make sure that should any litigation arise, the insurance company will go to atlantic records (and not me).

thank you.

-alan

phone: 323 988 9692

This email 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.

On May 26, 2015, at 9:16 AM, Richardson Joanne
<Joanne.Richardson@Hiscox.com> wrote:

Will do. On a call now

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

<image001.png>

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Tuesday, May 26, 2015 12:14 PM
To: Richardson Joanne
Subject: Re: Amazing Grace insurance

awesome

just left a vm

pls call when you get free

thank you.

phone: 323 988 9692

Sent from my iPhone

Sent from a iPhone

Error! Filename not specified.

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.

On May 26, 2015, at 8:17 AM, Richardson Joanne
<Joanne.Richardson@Hiscox.com> wrote:

Sure, I'm in all day. 646-452-2355

Call me when you are ready.

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

<image001.png>

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Monday, May 25, 2015 9:06 AM
To: Richardson Joanne
Subject: Re: Amazing Grace insurance

hi joanna

is it possible to talk with you on tuesday to start to go over this quote?

thank you.

-alan

phone: 323 988 9692

This email 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.

On Mar 4, 2015, at 12:25 PM, Stephen Carroll
<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

Error! Filename not specified.

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

(all of which ads are safety promoted), and so
notify the sender by reply info@alanelliott.net.

On Feb 27, 2015, at 1:42 PM, Stephen Carroll
<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
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>
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

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
Cell: 914-589-2474
Fax: 847-953-2692

<Amazing Grace Hiscox Quote.PDF>

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. No one else is authorised to distribute, forward, print, copy or act upon any information contained in this email. If you have received this email in error, please notify the sender.

Hiscox Syndicates Ltd and Hiscox Insurance Company Ltd are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority. Hiscox Underwriting Limited, Hiscox Europe Underwriting Limited and Hiscox ASM Limited are authorised and regulated by the Financial Conduct Authority. Hiscox plc is a company registered in England and Wales under company registration number 2837811

and registered office at 1 Great St Helen's, London EC3A 6HX.

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. No one else is authorised to distribute, forward, print, copy or act upon any information contained in this email. If you have received this email in error, please notify the sender.

Hiscox Syndicates Ltd and Hiscox Insurance Company Ltd are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority. Hiscox Underwriting Limited, Hiscox Europe Underwriting Limited and Hiscox ASM Limited are authorised and regulated by the Financial Conduct Authority. Hiscox plc is a company registered in England and Wales under company registration number 2837811 and registered office at 1 Great St Helen's, London EC3A 6HX.

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. No one else is authorised to distribute, forward, print, copy or act upon any information contained in this email. If you have received this email in error, please notify the sender.

Hiscox Syndicates Ltd and Hiscox Insurance Company Ltd are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority. Hiscox Underwriting Limited, Hiscox Europe Underwriting Limited and Hiscox ASM Limited are authorised and regulated by the Financial Conduct Authority. Hiscox plc is a company registered in England and Wales under company registration number 2837811 and registered office at 1 Great St Helen's, London EC3A 6HX.

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. No one else is authorised to distribute, forward, print, copy or act upon any information contained in this email. If you have received this email in error, please notify the sender.

Hiscox Syndicates Ltd and Hiscox Insurance Company Ltd are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority. Hiscox Underwriting Limited, Hiscox Europe Underwriting Limited and Hiscox ASM Limited are authorised and regulated by the Financial Conduct Authority. Hiscox plc is a company registered in England and Wales under company registration number 2837811 and registered office at 1 Great St Helen's, London EC3A 6HX.

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Re: Amazing Grace insurance
Date: July 1, 2015 at 7:03 AM
To: Richardson Joanne Joanne.Richardson@Hiscox.com



that would work. I will call you then.

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.

On Jul 1, 2015, at 6:56 AM, Richardson Joanne <Joanne.Richardson@Hiscox.com> wrote:

Sorry, I'm out today and not available for a call but that time works for me tomorrow. Let me know

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Wednesday, July 01, 2015 09:53 AM
To: Richardson Joanne
Subject: Re: Amazing Grace insurance

hi Joanne

are you around at 1030am pst today possibly?

please let me 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.

On Jun 1, 2015, at 6:52 AM, Richardson Joanne <Joanne.Richardson@Hiscox.com> wrote:

Alan, the following comments came back from our film clearance attorney (below). Can you please respond to these questions first.

I've reviewed the application, the contracts and the emails you sent me. The recording contract is for personal services but is for making records. I'm not sure what the assignment gives Warner Bros Seven Arts. The questions I have relate to whether all the necessary rights in the documentary are clear (individual releases, crowds, clips, photos, music etc.), Also, what is the deal the producer has with the original producer and have they checked out the chain of title to the film.

Joanne

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Tuesday, May 26, 2015 3:28 PM
To: Richardson Joanne
Cc: Todd W. Musburger
Subject: Re: Amazing Grace insurance

hi joanne

as discussed, here is the contract:

on page 2 is an indemnification clause from atlantic records to warner seven arts (from whom i have quitclaim of the film) and i would like to make sure that should any litigation arise, the insurance company will go to atlantic records (and not me).

thank you.

-alan

phone: 323 988 9692

This email 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.

On May 26, 2015, at 9:16 AM, Richardson Joanne
<Joanne.Richardson@Hiscox.com> wrote:

Will do. On a call now

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

<image001.png>

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Tuesday, May 26, 2015 12:14 PM
To: Richardson Joanne
Subject: Re: Amazing Grace insurance

awesome

just left a vm

pls call when you get free

thank you.

phone: 323 988 9692

Sent from a iPhone

Error! Filename not specified.

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.

On May 26, 2015, at 8:17 AM, Richardson Joanne
<Joanne.Richardson@Hiscox.com> wrote:

Sure, I'm in all day. 646-452-2355

Call me when you are ready.

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

<image001.png>

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Monday, May 25, 2015 9:06 AM
To: Richardson Joanne
Subject: Re: Amazing Grace insurance

hi joanna

is it possible to talk with you on tuesday to start to go over this quote?

thank you.

-alan

phone: 323 988 9692

This email 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.

On Mar 4, 2015, at 12:25 PM, Stephen Carroll
<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

Error! Filename not specified.

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.

On Feb 27, 2015, at 1:42 PM, Stephen Carroll <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
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> wrote:

So after all this time my

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
Cell: 914-589-2474
Fax: 847-953-2692

From: Stephen Carroll stephen.carroll@aon.com
Subject: RE: amazing grace insurance form
Date: February 5, 2015 at 9:40 AM
To: Alan Elliott 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

This email 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.

On Feb 2, 2015, at 9:57 AM, Stephen Carroll <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

This email 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.

<Video Film and Television Producers Application Admitted_Word1203.doc>

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Fwd: amazing grace insurance form
Date: February 5, 2015 at 4:27 PM
To: Todd W. Musburger todd@musburger.com



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.

Begin forwarded message:

From: Stephen Carroll <stephen.carroll@aon.com>
Date: February 5, 2015 at 9:40:52 AM PST
To: Alan Elliott <alanelliott@ucla.edu>
Subject: RE: amazing grace insurance form

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

This email 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

are strictly prohibited, and so notify the sender by reply info@alanelliott.net.

On Feb 2, 2015, at 9:57 AM, Stephen Carroll <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

This email 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.

<Video Film and Television Producers Application Admitted_Word1203.doc>

From: Alan Elliott alanelliott@ucla.edu 
Subject: amazing grace insurance form
Date: February 4, 2015 at 10:22 AM
To: Stephen Carroll stephen.carroll@aon.com
Cc: George Chignell georgec@passion-pictures.com, john battsek john@passion-pictures.com, Todd W. Musburger todd@musburger.com



hello

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



amazing
02021...03.doc

thank you.

-alan

phone: 323 988 9692

This email 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.

On Feb 2, 2015, at 9:57 AM, Stephen Carroll <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

This email 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.

<Video Film and Television Producers Application Admitted_Word1203.doc>

From: alan elliott (ucla) alanelliott@g.ucla.edu 

Subject: amazing grace insurance form

Date: February 9, 2015 at 1:48 PM

To: Stephen Carroll Stephen.carroll@aon.com

Cc: Todd W. Musburger todd@musburger.com, john battsek john@passion-pictures.com, Joe Boyd boyd1j@yahoo.co.uk



please let me know if there's anything missing/askew/wrong/right...



amazing
02091...3.docx

thank you.

-alan

phone: 323 988 9692

This email 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.

From: Todd Musburger todd@musburger.com
Subject: Re: Amazing Grace, LLC. - E&O QUOTE
Date: July 8, 2015 at 1:18 PM
To: alan elliott (ucla) alanelliott@g.ucla.edu

TM

As I suspected, they have not been given satisfaction of the chain of title...they will look at the Quit Claim and see the reference to Aretha and we will be back to square one...There is no need to tell anyone that you have a policy because you don't- not until the insurance co legal staff says yes to the theory..

Todd W. Musburger
Todd W. Musburger, Ltd.
142 E. Ontario
Suite 500
Chicago, Illinois 60611
312 664 2600

On Wed, Jul 8, 2015 at 3:12 PM, alan elliott (ucla) <alanelliott@g.ucla.edu> wrote:

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.

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Date: July 8, 2015 at 12:55:02 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Cc: Stephen Carroll <stephen.carroll@aon.com>
Subject: Amazing Grace, LLC. - E&O QUOTE

Alan,

Attached please find the Errors & Omissions' quotes for "**Amazing Grace**" provided by Hiscox. Please review along with our Transparency paperwork and advise if you wish to bind.

Prior to binding, we need the following:

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.

SUBJECTIVITIES:

To remove endorsement 2542 - Failure to Obtain License Exclusion

Need update on Question # 22 that all final selections have been made and all rights and releases obtained.

Title Search Report and Opinion

To consider removal of the **title exclusion**, please forward a Title Search Report and an opinion.

Aon Choice Limitation of Liability Program please be advised we are limiting our Liability to \$1,000,000. See page 11, Your Limitation of Our Liability of our Insurance Proposal (attached).

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](tel:(212)627-7400) / Direct: [\(212\) 463-5586](tel:(212)463-5586)

Fax: [\(212\) 633-1457](tel:(212)633-1457) / Direct: [\(847\) 953-0849](tel:(847)953-0849)

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Re: Amazing Grace, LLC. - E&O QUOTE
Date: July 8, 2015 at 1:31 PM
To: Annette Shavuo annette.shavuo@aon.com
Cc: Stephen Carroll stephen.carroll@aon.com



hi

question 22 has been approved according to the lawyer ted gerdes who works for joanne richardson.

thank you.

-alan

phone: 323 988 9692

This email 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.

On Jul 8, 2015, at 12:55 PM, Annette Shavuo <annette.shavuo@aon.com> wrote:

Alan,

Attached please find the Errors & Omissions' quotes for “**Amazing Grace**” provided by Hiscox. Please review along with our Transparency paperwork and advise if you wish to bind.

Prior to binding, we need the following:

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.

SUBJECTIVITIES:

To remove endorsement 2542 - Failure to Obtain License Exclusion
Need update on Question # 22 that all final selections have been made and all rights and releases obtained.

Title Search Report and Opinion

To consider removal of the **title exclusion**, please forward a Title Search Report and an opinion.

Aon Choice Limitation of Liability Program please be advised we are limiting our Liability to \$1,000,000. See page 11, Your Limitation of Our Liability of our Insurance Proposal (attached).

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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

<T&D Insurance Proposal -Amazing Grace - E&O.pdf><Amazing Grace Hiscox Quote.PDF><QDR AGR Premiums - Amazing Grace 2014 0731 v2.xls>

From: Todd Musburger todd@musburger.com
Subject: Re: Amazing Grace, LLC. - E&O QUOTE
Date: July 8, 2015 at 1:36 PM
To: alan elliott (ucla) alanelliott@g.ucla.edu

TM

Subjectivities
Endorsement 2542
Question 22

Todd W. Musburger
Todd W. Musburger, Ltd.
142 E. Ontario
Suite 500
Chicago, Illinois 60611
312 664 2600

On Wed, Jul 8, 2015 at 3:28 PM, alan elliott (ucla) <alanelliott@g.ucla.edu> wrote:
where in doc do I need to talk to them about?

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.

On Jul 8, 2015, at 1:18 PM, Todd Musburger <todd@musburger.com> wrote:

As I suspected, they have not been given satisfaction of the chain of title...they will look at the Quit Claim and see the reference to Aretha and we will be back to square one...There is no need to tell anyone that you have a policy because you don't- not until the insurance co legal staff says yes to the theory...

Todd W. Musburger
Todd W. Musburger, Ltd.
142 E. Ontario
Suite 500
Chicago, Illinois 60611
[312 664 2600](tel:3126642600)

On Wed, Jul 8, 2015 at 3:12 PM, alan elliott (ucla) <alanelliott@g.ucla.edu> wrote:

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.

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Date: July 8, 2015 at 12:55:02 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Cc: Stephen Carroll <stephen.carroll@aon.com>
Subject: Amazing Grace, LLC. - E&O QUOTE

Alan,

Attached please find the Errors & Omissions' quotes for “**Amazing Grace**” provided by Hiscox. Please review along with our Transparency paperwork and advise if you wish to bind.

Prior to binding, we need the following:

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.

SUBJECTIVITIES:

To remove endorsement 2542 - Failure to Obtain License Exclusion

Need update on Question # 22 that all final selections have been made and all rights and releases obtained.

Title Search Report and Opinion

To consider removal of the **title exclusion**, please forward a Title Search Report and an opinion.

Aon Choice Limitation of Liability Program please be advised we are limiting our Liability to \$1,000,000. See page 11, Your Limitation of Our Liability of our Insurance Proposal (attached).

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](tel:(212)627-7400) / Direct: [\(212\) 463-5586](tel:(212)463-5586)

Fax: [\(212\) 633-1457](tel:(212)633-1457) / Direct: [\(847\) 953-0849](tel:(847)953-0849)

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Fwd: Amazing Grace, LLC. - E&O QUOTE
Date: February 24, 2016 at 9:55 PM
To: Shaun H. Crosner scrosner@linerlaw.com



thank you.

-alan

phone: 323 988 9692
peace and love.

<http://songsoundrecord.tumblr.com>

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Subject: Amazing Grace, LLC. - E&O QUOTE
Date: July 8, 2015 at 12:55:02 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Cc: Stephen Carroll <stephen.carroll@aon.com>

Alan,

Attached please find the Errors & Omissions' quotes for "Amazing Grace" provided by Hiscox. Please review along with our Transparency paperwork and advise if you wish to bind.

Prior to binding, we need the following:

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.

SUBJECTIVITIES:

To remove endorsement 2542 - Failure to Obtain License Exclusion
Need update on Question # 22 that all final selections have been made and all rights and releases obtained.

Title Search Report and Opinion

To consider removal of the **title exclusion**, please forward a Title Search Report and an opinion.

Aon Choice Limitation of Liability Program please be advised we are limiting our Liability to \$1,000,000. See page 11, Your Limitation of Our Liability of our Insurance Proposal (attached).

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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.



T&D Insurance
Propos...&O.pdf



Amazing Grace
Hiscox...te.PDF



QDR AGR
Premiu...1 v2.xls

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Re: Amazing Grace, LLC. - E&O QUOTE
Date: February 24, 2016 at 10:05 PM
To: Shaun H. Crosner scrosner@linerlaw.com



i asked the carrier to get me a copy of the full policy.

thank you.

-alan

phone: 323 988 9692
peace and love.

<http://songsoundrecord.tumblr.com>

On Feb 24, 2016, at 9:57 PM, Shaun H. Crosner <scrosner@linerlaw.com> wrote:

Hi Alan,

This is a quote for coverage. You would have likely received a copy of the full policy shortly after inception.

Shaun H. Crosner, Esq.
Liner LLP
Direct: 310.500.3352
scrosner@linerlaw.com

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Wednesday, February 24, 2016 9:55 PM
To: Shaun H. Crosner
Subject: Fwd: Amazing Grace, LLC. - E&O QUOTE

thank you.

-alan

phone: 323 988 9692
peace and love.

<http://songsoundrecord.tumblr.com>

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Subject: Amazing Grace, LLC. - E&O QUOTE
Date: July 8, 2015 at 12:55:02 PM PDT
To: "alanelliott@ucla.edu" <alanelliott@ucla.edu>

To: ~~ashavuo@aon.com~~ ~~ashavuo@aon.com~~
Cc: Stephen Carroll <stephen.carroll@aon.com>

Alan,

Attached please find the Errors & Omissions' quotes for “**Amazing Grace**” provided by Hiscox. Please review along with our Transparency paperwork and advise if you wish to bind.

Prior to binding, we need the following:

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.

SUBJECTIVITIES:

To remove endorsement 2542 - Failure to Obtain License Exclusion
Need update on Question # 22 that all final selections have been made and all rights and releases obtained.

Title Search Report and Opinion

To consider removal of the **title exclusion**, please forward a Title Search Report and an opinion.

Aon Choice Limitation of Liability Program please be advised we are limiting our Liability to \$1,000,000. See page 11, Your Limitation of Our Liability of our Insurance Proposal (attached).

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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use

of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Re: Amazing Grace, LLC. - E&O QUOTE
Date: February 25, 2016 at 1:11 PM
To: Shaun H. Crosner scrosner@linerlaw.com



is tomorrow at 10:30 good?

thank you.

-alan

phone: [323 988 9692](tel:3239889692)
peace and love.

On Feb 25, 2016, at 11:34 AM, Shaun H. Crosner <scrosner@linerlaw.com> wrote:

Hi Alan,

Do you have time for a follow-up call later today or tomorrow?

Thanks,
Shaun

Shaun H. Crosner, Esq.
Liner LLP
Direct: 310.500.3352
scrosner@linerlaw.com

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Wednesday, February 24, 2016 10:06 PM
To: Shaun H. Crosner
Subject: Re: Amazing Grace, LLC. - E&O QUOTE

i asked the carrier to get me a copy of the full policy.

thank you.

-alan

phone: 323 988 9692
peace and love.

<http://songsoundrecord.tumblr.com>

On Feb 24, 2016, at 9:57 PM, Shaun H. Crosner <scrosner@linerlaw.com> wrote:

Hi Alan,

This is a quote for coverage. You would have likely received a copy of the full policy shortly after inception.

Shaun H. Crosner, Esq.
Liner LLP
Direct: 310.500.3352
scrosner@linerlaw.com

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Wednesday, February 24, 2016 9:55 PM
To: Shaun H. Crosner
Subject: Fwd: Amazing Grace, LLC. - E&O QUOTE

thank you.

-alan

phone: 323 988 9692
peace and love.

<http://songsoundrecord.tumblr.com>

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Subject: Amazing Grace, LLC. - E&O QUOTE
Date: July 8, 2015 at 12:55:02 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Cc: Stephen Carroll <stephen.carroll@aon.com>

Alan,

Attached please find the Errors & Omissions' quotes for “**Amazing Grace**” provided by Hiscox. Please review along with our Transparency paperwork and advise if you wish to bind.

Prior to binding, we need the following:

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

and related (see attachment), page 17

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

SUBJECTIVITIES:

To remove endorsement 2542 - Failure to Obtain License Exclusion

Need update on Question # 22 that all final selections have been made and all rights and releases obtained.

Title Search Report and Opinion

To consider removal of the **title exclusion**, please forward a Title Search Report and an opinion.

Aon Choice Limitation of Liability Program please be advised we are limiting our Liability to \$1,000,000. See page 11, Your Limitation of Our Liability of our Insurance Proposal (attached).

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

Before you print, think about the ENVIRONMENT 🌱

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Fwd: Amazing Grace, LLC. - E&O QUOTE
Date: March 15, 2016 at 2:59 PM
To: Todd W. Musburger todd@musburger.com, Tom McGuire tmcguire@wmeentertainment.com



thank you.

-alan

phone: 323 988 9692
peace and love.

<http://songsoundrecord.tumblr.com>

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Subject: Amazing Grace, LLC. - E&O QUOTE
Date: July 8, 2015 at 12:55:02 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Cc: Stephen Carroll <stephen.carroll@aon.com>

Alan,

Attached please find the Errors & Omissions' quotes for "Amazing Grace" provided by Hiscox. Please review along with our Transparency paperwork and advise if you wish to bind.

Prior to binding, we need the following:

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.

SUBJECTIVITIES:

To remove endorsement 2542 - Failure to Obtain License Exclusion
Need update on Question # 22 that all final selections have been made and all rights and releases obtained.

Title Search Report and Opinion

To consider removal of the **title exclusion**, please forward a Title Search Report and an opinion.

Aon Choice Limitation of Liability Program please be advised we are limiting our Liability to \$1,000,000. See page 11, Your Limitation of Our Liability of our Insurance Proposal (attached).

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

Before you print, think about the ENVIRONMENT 🌳

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.



T&D Insurance
Propos...&O.pdf

371 KB



Amazing Grace
Hiscox...te.PDF

Downloading...



QDR AGR
Premiu...1 v2.xls

45 KB

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Fwd: Amazing Grace, LLC. - E&O QUOTE
Date: July 8, 2015 at 1:12 PM
To: Todd W. Musburger todd@musburger.com



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.

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Date: July 8, 2015 at 12:55:02 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Cc: Stephen Carroll <stephen.carroll@aon.com>
Subject: Amazing Grace, LLC. - E&O QUOTE

Alan,

Attached please find the Errors & Omissions' quotes for "**Amazing Grace**" provided by Hiscox. Please review along with our Transparency paperwork and advise if you wish to bind.

Prior to binding, we need the following:

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.

SUBJECTIVITIES:

To remove endorsement 2542 - Failure to Obtain License Exclusion
Need update on Question # 22 that all final selections have been made and all rights and releases obtained.

Title Search Report and Opinion

To consider removal of the **title exclusion**, please forward a Title Search Report and an opinion.

Aon Choice Limitation of Liability Program please be advised we are limiting our Liability to \$1,000,000. See page 11, Your Limitation of Our Liability of our Insurance Proposal (attached).

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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.



T&D Insurance
Propos...&O.pdf

[Downloading...](#)



Amazing Grace
Hiscox...te.PDF

[189 KB](#)



QDR AGR
Premiu...1 v2.xls

[45 KB](#)

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

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.



Video_Film_and_
Televisi...ion.pdf



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

From: Steven Zansberg <SZansberg@Iskslaw.com>
Subject: RE: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]
Date: June 26, 2017 at 7:13 PM
To: alan elliott <alanelliott@g.ucla.edu>



No conflict with their retaining us; we do work for them all the time.

If you mean can we advise you regarding issues with Chubb, the answer is "no, we cannot."

-Steve

[Steven D. Zansberg](#)
Levine Sullivan Koch & Schulz, LLP
(303) 376-2409

Sent from my hand-held device. Please excuse typos.

----- Original message -----

From: alan elliott <alanelliott@g.ucla.edu>
Date: 6/26/17 6:56 PM (GMT-06:00)
To: Jay Brown <JBrown@Iskslaw.com>, Steven Zansberg <SZansberg@Iskslaw.com>
Subject: Re: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

they are kicking this to the chubb group (original insurers up to 2011).

here's a question:

does your firm have a conflict with chubb?

thank you.

-alan

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

peace and love.

Begin forwarded message:

From: "Cope, Victoria" <Victoria.Cope@clydeco.us>
Date: June 26, 2017 at 1:03:58 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Cc: "Bertschi, Scott" <Scott.Bertschi@clydeco.us>, "maria.clark@aon.com" <maria.clark@aon.com>, Bodden Tara <Tara.Bodden@HISCOX.com>
Subject: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

Dear Mr. Elliott:

Please see the attached correspondence from Scott Bertschi in the above-referenced matter.

Should you have any questions or concerns, please do not hesitate to contact us.

Thank you,

Victoria Cope
Legal Administrative Assistant | Clyde & Co US LLP
Direct Dial: +1 404 410 3160 | Mobile: +1 404 374 5461

Please consider the environment before printing this e-mail.

This communication, including attachments, is confidential, may be subject to legal privileges, and is intended for the sole use of the addressee. Any use, duplication, disclosure, or dissemination of this communication, other than by the addressee, is prohibited. If you have received this communication in error, please notify the sender immediately and delete or destroy this communication and all copies.

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Fwd: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]
Date: June 26, 2017 at 8:27 PM
To: Winnie Wong WWong@mmibi.com



let's please discuss tomorrow.

thank you.

-alan

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

peace and love.

Begin forwarded message:

From: "Cope, Victoria" <Victoria.Cope@clydeco.us>
Date: June 26, 2017 at 1:03:58 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Cc: "Bertschi, Scott" <Scott.Bertschi@clydeco.us>, "maria.clark@aon.com" <maria.clark@aon.com>, Bodden Tara <Tara.Bodden@HISCOX.com>
Subject: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

Dear Mr. Elliott:

Please see the attached correspondence from Scott Bertschi in the above-referenced matter.

Should you have any questions or concerns, please do not hesitate to contact us.

Thank you,

Victoria Cope
Legal Administrative Assistant | Clyde & Co US LLP
Direct Dial: +1 404 410 3160 | Mobile: +1 404 374 5461

CLYDE & CO

271 17th Street | Suite 1720 | Atlanta | GA 30363 | USA
Main +1 404 410 3150 | Fax +1 404 410 3151 | www.clydeco.us

This email message and any attachments may contain legally privileged and/or confidential information intended solely for the use of the individual or entity to whom it is addressed. If the reader of this message is not the intended recipient, you are hereby notified that any reading, dissemination, distribution or copying of this message or its attachments is strictly prohibited. If you have received this email message in error, please immediately notify us by telephone, fax or email and delete the message and all attachments thereto. Thank you. Clyde & Co US LLP is a Delaware limited liability law partnership affiliated with Clyde & Co LLP, a multinational partnership regulated by The Law Society of England and Wales.

Disclosure: To ensure compliance with requirements imposed by the IRS in Circular 230, we inform you that any tax advice contained in this communication (including any attachment that does not explicitly state otherwise) is not intended or written to be used, and cannot be used, for the purpose of avoiding penalties under the Internal Revenue Code or promoting, marketing or recommending to another party any transaction or matter addressed herein.



Hiscox_Amazing
Grace...7).PDF



From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Re: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]
Date: June 26, 2017 at 8:31 PM
To: Steven Zansberg SZansberg@iskslaw.com

any thought on how best should i go to chubb to get you/firm to start the dialogue with chubb?

thank you.

-alan

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

peace and love.

On Jun 26, 2017, at 7:13 PM, Steven Zansberg <SZansberg@iskslaw.com> wrote:

No conflict with their retaining us; we do work for them all the time.

If you mean can we advise you regarding issues with Chubb, the answer is "no, we cannot."

-Steve

[Steven D. Zansberg](#)

Levine Sullivan Koch & Schulz, LLP
(303) 376-2409

Sent from my hand-held device. Please excuse typos.

----- Original message -----

From: alan elliott <alanelliott@g.ucla.edu>

Date: 6/26/17 6:56 PM (GMT-06:00)

To: Jay Brown <JBrown@iskslaw.com>, Steven Zansberg <SZansberg@iskslaw.com>

Subject: Re: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

they are kicking this to the chubb group (original insurers up to 2011).

here's a question:

does your firm have a conflict with chubb?

thank you.

-alan

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

peace and love.

Begin forwarded message:

From: "Cope, Victoria" <Victoria.Cope@clydeco.us>

Date: June 26, 2017 at 1:03:58 PM PDT

To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>

Cc: "Bertschi, Scott" <Scott.Bertschi@clydeco.us>, "maria.clark@aon.com" <maria.clark@aon.com>, Bodden Tara <Tara.Bodden@HISCOX.com>

Subject: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

Dear Mr. Elliott:

Please see the attached correspondence from Scott Bertschi in the above-referenced matter.

Should you have any questions or concerns, please do not hesitate to contact us.

Thank you,

Victoria Cope

Legal Administrative Assistant | Clyde & Co US LLP

Direct Dial: +1 404 410 3160 | **Mobile:** +1 404 374 5461

Please consider the environment before printing this e-mail.

This communication, including attachments, is confidential, may be subject to legal privileges, and is intended for the sole use of the addressee. Any use, duplication, disclosure, or dissemination of this communication, other than by the addressee, is prohibited. If you have received this communication in error, please notify the sender immediately and delete or destroy this communication and all copies.



From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Fwd: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]
Date: June 26, 2017 at 8:40 PM
To: Robert Johnson raj@ineteconomics.org

thank you.

-alan

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

peace and love.

Begin forwarded message:

From: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Date: June 26, 2017 at 8:30:58 PM PDT
To: Steven Zansberg <SZansberg@lskslaw.com>
Subject: Re: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

any thought on how best should i go to chubb to get you/firm to start the dialogue with chubb?

thank you.

-alan

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

peace and love.

On Jun 26, 2017, at 7:13 PM, Steven Zansberg <SZansberg@lskslaw.com> wrote:

No conflict with their retaining us; we do work for them all the time.

If you mean can we advise you regarding issues with Chubb, the answer is "no, we cannot."

-Steve

[Steven D. Zansberg](mailto:Steven.D.Zansberg@lskslaw.com)

Levine Sullivan Koch & Schulz, LLP
(303) 376-2409

Sent from my hand-held device. Please excuse typos.

----- Original message -----

From: alan elliott <alanelliott@g.ucla.edu>
Date: 6/26/17 6:56 PM (GMT-06:00)
To: Jay Brown <JBrown@lskslaw.com>, Steven Zansberg <SZansberg@lskslaw.com>
Subject: Re: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

they are kicking this to the chubb group (original insurers up to 2011).

here's a question:

does your firm have a conflict with chubb?

thank you.

-alan

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

peace and love.

Begin forwarded message:

From: "Cope, Victoria" <Victoria.Cope@clydeco.us>
Date: June 26, 2017 at 1:03:58 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Cc: "Bertschi, Scott" <Scott.Bertschi@clydeco.us>, "maria.clark@aon.com" <maria.clark@aon.com>, Bodden Tara <Tara.Bodden@HISCOX.com>
Subject: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

Dear Mr. Elliott:

Please see the attached correspondence from Scott Bertschi in the above-referenced matter.

Should you have any questions or concerns, please do not hesitate to contact us.

Thank you,

Victoria Cope



Legal Administrative Assistant | Clyde & Co US LLP
Direct Dial: +1 404 410 3160 | Mobile: +1 404 374 5461

Please consider the environment before printing this e-mail.

This communication, including attachments, is confidential, may be subject to legal privileges, and is intended for the sole use of the addressee. Any use, duplication, disclosure, or dissemination of this communication, other than by the addressee, is prohibited. If you have received this communication in error, please notify the sender immediately and delete or destroy this communication and all copies.

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Fwd: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]
Date: June 26, 2017 at 9:57 PM
To: Todd W. Musburger todd@musburger.com



thank you.

-alan

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

peace and love.

Begin forwarded message:

From: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Date: June 26, 2017 at 8:30:58 PM PDT
To: Steven Zansberg <SZansberg@lskslaw.com>
Subject: Re: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

any thought on how best should i go to chubb to get you/firm to start the dialogue with chubb?

thank you.

-alan

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

peace and love.

On Jun 26, 2017, at 7:13 PM, Steven Zansberg <SZansberg@lskslaw.com> wrote:

No conflict with their retaining us; we do work for them all the time.

If you mean can we advise you regarding issues with Chubb, the answer is "no, we cannot."

-Steve

[Steven D. Zansberg](mailto:Steven.D.Zansberg@lskslaw.com)

Levine Sullivan Koch & Schulz, LLP
(303) 376-2409

Sent from my hand-held device. Please excuse typos.

----- Original message -----

From: alan elliott <alanelliott@g.ucla.edu>
Date: 6/26/17 6:56 PM (GMT-06:00)
To: Jay Brown <JBrown@lskslaw.com>, Steven Zansberg <SZansberg@lskslaw.com>
Subject: Re: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

they are kicking this to the chubb group (original insurers up to 2011).

here's a question:

does your firm have a conflict with chubb?

thank you.

-alan

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

peace and love.

Begin forwarded message:

From: "Cope, Victoria" <Victoria.Cope@clydeco.us>
Date: June 26, 2017 at 1:03:58 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Cc: "Bertschi, Scott" <Scott.Bertschi@clydeco.us>, "maria.clark@aon.com" <maria.clark@aon.com>, Bodden Tara <Tara.Bodden@HISCOX.com>
Subject: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

Dear Mr. Elliott:

Please see the attached correspondence from Scott Bertschi in the above-referenced matter.

Should you have any questions or concerns, please do not hesitate to contact us.

Thank you,

Victoria Cope



Legal Administrative Assistant | Clyde & Co US LLP
Direct Dial: +1 404 410 3160 | Mobile: +1 404 374 5461

Please consider the environment before printing this e-mail.

This communication, including attachments, is confidential, may be subject to legal privileges, and is intended for the sole use of the addressee. Any use, duplication, disclosure, or dissemination of this communication, other than by the addressee, is prohibited. If you have received this communication in error, please notify the sender immediately and delete or destroy this communication and all copies.

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Fwd: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]
Date: June 26, 2017 at 9:58 PM
To: Boyd Joe boyd1j@fastmail.com



they are kicking it to the previous insurer (chubb).

will ask warwick for his thoughts...

thank you.

-alan

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

peace and love.

Begin forwarded message:

From: "Cope, Victoria" <Victoria.Cope@clydeco.us>
Date: June 26, 2017 at 1:03:58 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Cc: "Bertschi, Scott" <Scott.Bertschi@clydeco.us>, "maria.clark@aon.com" <maria.clark@aon.com>, Bodden Tara <Tara.Bodden@HISCOX.com>
Subject: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

Dear Mr. Elliott:

Please see the attached correspondence from Scott Bertschi in the above-referenced matter.

Should you have any questions or concerns, please do not hesitate to contact us.

Thank you,

Victoria Cope
Legal Administrative Assistant | Clyde & Co US LLP
Direct Dial: +1 404 410 3160 | **Mobile:** +1 404 374 5461

CLYDE & CO

271 17th Street | Suite 1720 | Atlanta | GA 30363 | USA
Main +1 404 410 3150 | **Fax** +1 404 410 3151 | www.clydeco.us

This email message and any attachments may contain legally privileged and/or confidential information intended solely for the use of the individual or entity to whom it is addressed. If the reader of this message is not the intended recipient, you are hereby notified that any reading, dissemination, distribution or copying of this message or its attachments is strictly prohibited. If you have received this email message in error, please immediately notify us by telephone, fax or email and delete the message and all attachments thereto. Thank you. Clyde & Co US LLP is a Delaware limited liability law partnership affiliated with Clyde & Co LLP, a multinational partnership regulated by The Law Society of England and Wales.

Disclosure: To ensure compliance with requirements imposed by the IRS in Circular 230, we inform you that any tax advice contained in this communication (including any attachment that does not explicitly state otherwise) is not intended or written to be used, and cannot be used, for the purpose of avoiding penalties under the Internal Revenue Code or promoting, marketing or recommending to another party any transaction or matter addressed herein.



Hiscox_Amazing
Grace...7).PDF

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Fwd: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]
Date: June 26, 2017 at 9:59 PM
To: john boyd jwb@fbdlaw.com



they are kicking it to the previous insurer (chubb).

whattayathink...?

thank you.

-alan

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

peace and love.

Begin forwarded message:

From: "Cope, Victoria" <Victoria.Cope@clydeco.us>
Date: June 26, 2017 at 1:03:58 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Cc: "Bertschi, Scott" <Scott.Bertschi@clydeco.us>, "maria.clark@aon.com" <maria.clark@aon.com>, Bodden Tara <Tara.Bodden@HISCOX.com>
Subject: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

Dear Mr. Elliott:

Please see the attached correspondence from Scott Bertschi in the above-referenced matter.

Should you have any questions or concerns, please do not hesitate to contact us.

Thank you,

Victoria Cope
Legal Administrative Assistant | Clyde & Co US LLP
Direct Dial: +1 404 410 3160 | **Mobile:** +1 404 374 5461

CLYDE & CO

271 17th Street | Suite 1720 | Atlanta | GA 30363 | USA
Main +1 404 410 3150 | **Fax** +1 404 410 3151 | www.clydeco.us

This email message and any attachments may contain legally privileged and/or confidential information intended solely for the use of the individual or entity to whom it is addressed. If the reader of this message is not the intended recipient, you are hereby notified that any reading, dissemination, distribution or copying of this message or its attachments is strictly prohibited. If you have received this email message in error, please immediately notify us by telephone, fax or email and delete the message and all attachments thereto. Thank you. Clyde & Co US LLP is a Delaware limited liability law partnership affiliated with Clyde & Co LLP, a multinational partnership regulated by The Law Society of England and Wales.

Disclosure: To ensure compliance with requirements imposed by the IRS in Circular 230, we inform you that any tax advice contained in this communication (including any attachment that does not explicitly state otherwise) is not intended or written to be used, and cannot be used, for the purpose of avoiding penalties under the Internal Revenue Code or promoting, marketing or recommending to another party any transaction or matter addressed herein.



Hiscox_Amazing
Grace...7).PDF

From: Joe Boyd boyd1j@fastmail.com 
Subject: Re: Fwd: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]
Date: June 27, 2017 at 10:21 AM
To: alan elliott (ucla) alanelliott@g.ucla.edu



Hi Alan - just tried to ring - I'll be around if you want to Skype or suggest a time to talk

J

--
Joe Boyd
boyd1j@fastmail.com

*My A-Z podcast can be found at <http://www.joeboyd.co.uk>
10-minute musical adventures from around the world!*

On Tue, Jun 27, 2017, at 05:58, alan elliott (ucla) wrote:

they are kicking it to the previous insurer (chubb).

will ask warwick for his thoughts...

thank you.
-alan

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

peace and love.

Begin forwarded message:

From: "Cope, Victoria" <Victoria.Cope@clydeco.us>
Date: June 26, 2017 at 1:03:58 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Cc: "Bertschi, Scott" <Scott.Bertschi@clydeco.us>, "maria.clark@aon.com" <maria.clark@aon.com>, Bodden Tara <Tara.Bodden@HISCOX.com>
Subject: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

Dear Mr. Elliott:

Please see the attached correspondence from Scott Bertschi in the above-referenced matter.

Should you have any questions or concerns, please do not hesitate to contact us.

Thank you,

Victoria Cope
Legal Administrative Assistant | Clyde & Co US LLP
Direct Dial: +1 404 410 3160 | Mobile: +1 404 374 5461

CLYDE&CO

271 17th Street | Suite 1720 | Atlanta | GA 30363 | USA
Main +1 404 410 3150 | Fax +1 404 410 3151 | www.clydeco.us

This email message and any attachments may contain legally privileged and/or confidential information intended solely for the use of the individual or entity to whom it is addressed. If the reader of this message is not the intended recipient, you are hereby notified that any reading, dissemination, distribution or copying of this message or its attachments is strictly prohibited. If you have received this email message in error, please immediately notify us by telephone, fax or email and delete the message and all attachments thereto. Thank you. Clyde & Co US LLP is a Delaware limited liability law partnership affiliated with Clyde & Co LLP, a multinational partnership regulated by The Law Society of England and Wales.

Disclosure: To ensure compliance with requirements imposed by the IRS in Circular 230, we inform you that any tax advice contained in this communication (including any attachment that does not explicitly state otherwise) is not intended or written to be used, and cannot be used, for the purpose of avoiding penalties under the Internal Revenue Code or promoting, marketing or recommending to another party any transaction or matter addressed herein.

Email had 1 attachment:

- [Hiscox_Amazing Grace - Ltr to Alan Elliott \(6-26-17\).PDF](#)
175k (application/pdf)

From: Lew Loss lloss@ljwllp.com
Subject: RE: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]
Date: June 27, 2017 at 12:10 PM
To: alan elliott (ucla) alanelliott@g.ucla.edu
Cc: Charles Chotvacs cchotvacs@ljwllp.com



Alan:

As we look at this again, please update us on your access to the financing and your plans for proceeding. Thanks

Lew

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Monday, June 26, 2017 5:28 PM
To: Lew Loss <lloss@ljwllp.com>
Cc: Charles Chotvacs <cchotvacs@ljwllp.com>
Subject: Re: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

they are kicking this to the chubb group (original insurers up to 2011).

thank you.

-alan

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

peace and love.

On Jun 26, 2017, at 1:14 PM, Lew Loss <lloss@ljwllp.com> wrote:

Thanks, Alan. We will review and provide our thoughts.

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Monday, June 26, 2017 4:06 PM
To: Lew Loss <lloss@ljwllp.com>; Charles Chotvacs <cchotvacs@ljwllp.com>
Subject: Fwd: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

thank you.

-alan

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

peace and love.

Begin forwarded message:

From: "Cope, Victoria" <Victoria.Cope@clydeco.us>
Date: June 26, 2017 at 1:03:58 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Cc: "Bertschi, Scott" <Scott.Bertschi@clydeco.us>, "maria.clark@aon.com" <maria.clark@aon.com>, Bodden Tara <Tara.Bodden@HISCOX.com>
Subject: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

Dear Mr. Elliott:

Please see the attached correspondence from Scott Bertschi in the above-referenced matter.

Should you have any questions or concerns, please do not hesitate to contact us.

Thank you,

Victoria Cope
Legal Administrative Assistant | Clyde & Co US LLP
Direct Dial: +1 404 410 3160 | Mobile: +1 404 374 5461

Please consider the environment before printing this e-mail.

This communication, including attachments, is confidential, may be subject to legal privileges, and is intended for the sole use of the addressee. Any use, duplication, disclosure, or dissemination of this communication, other than by the addressee, is prohibited. If you have received this communication in error, please notify the sender immediately and delete or destroy this communication and all copies.

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Re: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]
Date: June 27, 2017 at 12:12 PM
To: Lew Loss lloss@ljwllp.com
Cc: Charles Chotvacs cchotvacs@ljwllp.com



i'm sorry, i don't understand.
the financing for the film (concord is sticking by as funder)?
or
funding for you guys as you can/can't take this on?
thank you.
-alan

phone: 323 988 9692

peace and love.

On Jun 27, 2017, at 12:10 PM, Lew Loss <lloss@ljwllp.com> wrote:

Alan:

As we look at this again, please update us on your access to the financing and your plans for proceeding. Thanks

Lew

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Monday, June 26, 2017 5:28 PM
To: Lew Loss <lloss@ljwllp.com>
Cc: Charles Chotvacs <cchotvacs@ljwllp.com>
Subject: Re: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

they are kicking this to the chubb group (original insurers up to 2011).

thank you.

-alan

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

peace and love.

On Jun 26, 2017, at 1:14 PM, Lew Loss <lloss@ljwllp.com> wrote:

Thanks, Alan. We will review and provide our thoughts.

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Monday, June 26, 2017 4:06 PM
To: Lew Loss <lloss@ljwllp.com>; Charles Chotvacs <cchotvacs@ljwllp.com>
Subject: Fwd: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

thank you.

-alan

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

peace and love.

Begin forwarded message:

From: "Cope, Victoria" <Victoria.Cope@clydeco.us>
Date: June 26, 2017 at 1:03:58 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Cc: "Bertschi, Scott" <Scott.Bertschi@clydeco.us>, "maria.clark@aon.com" <maria.clark@aon.com>, Bodden Tara <Tara.Bodden@HISCOX.com>
Subject: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

Subject: Amazing Grace, LLC dba: Arena Franklin / MSCA REFERENCE NO: 170001447 [CC-031110300002]

Dear Mr. Elliott:

Please see the attached correspondence from Scott Bertschi in the above-referenced matter.

Should you have any questions or concerns, please do not hesitate to contact us.

Thank you,

Victoria Cope
Legal Administrative Assistant | Clyde & Co US LLP
Direct Dial: +1 404 410 3160 | **Mobile:** +1 404 374 5461

Please consider the environment before printing this e-mail.

This communication, including attachments, is confidential, may be subject to legal privileges, and is intended for the sole use of the addressee. Any use, duplication, disclosure, or dissemination of this communication, other than by the addressee, is prohibited. If you have received this communication in error, please notify the sender immediately and delete or destroy this communication and all copies.

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Fwd: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]
Date: June 26, 2017 at 1:06 PM
To: Lew Loss lloss@ljwllp.com, cchotvac@ljwllp.com



thank you.

-alan

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

peace and love.

Begin forwarded message:

From: "Cope, Victoria" <Victoria.Cope@clydeco.us>
Date: June 26, 2017 at 1:03:58 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Cc: "Bertschi, Scott" <Scott.Bertschi@clydeco.us>, "maria.clark@aon.com" <maria.clark@aon.com>, Bodden Tara <Tara.Bodden@HISCOX.com>
Subject: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

Dear Mr. Elliott:

Please see the attached correspondence from Scott Bertschi in the above-referenced matter.

Should you have any questions or concerns, please do not hesitate to contact us.

Thank you,

Victoria Cope
Legal Administrative Assistant | Clyde & Co US LLP
Direct Dial: +1 404 410 3160 | Mobile: +1 404 374 5461

CLYDE & CO

271 17th Street | Suite 1720 | Atlanta | GA 30363 | USA
Main +1 404 410 3150 | Fax +1 404 410 3151 | www.clydeco.us

This email message and any attachments may contain legally privileged and/or confidential information intended solely for the use of the individual or entity to whom it is addressed. If the reader of this message is not the intended recipient, you are hereby notified that any reading, dissemination, distribution or copying of this message or its attachments is strictly prohibited. If you have received this email message in error, please immediately notify us by telephone, fax or email and delete the message and all attachments thereto. Thank you. Clyde & Co US LLP is a Delaware limited liability law partnership affiliated with Clyde & Co LLP, a multinational partnership regulated by The Law Society of England and Wales.

Disclosure: To ensure compliance with requirements imposed by the IRS in Circular 230, we inform you that any tax advice contained in this communication (including any attachment that does not explicitly state otherwise) is not intended or written to be used, and cannot be used, for the purpose of avoiding penalties under the Internal Revenue Code or promoting, marketing or recommending to another party any transaction or matter addressed herein.



Hiscox_Amazing
Grace...7).PDF

From: Lew Loss lloss@jwllp.com
Subject: RE: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]
Date: June 27, 2017 at 12:19 PM
To: alan elliott (ucla) alanelliott@g.ucla.edu



I am sorry if my email was too cryptic. Last I knew, as I recall, your funding source for the film distribution effort was tied to getting a letter from counsel expressing the view that you have the rights to distribute. If that money then came through, you would have a funding source for our efforts. If I don't have that quite correct, I apologize.

Thanks

Lew

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Tuesday, June 27, 2017 3:12 PM
To: Lew Loss <lloss@jwllp.com>
Cc: Charles Chotvacs <cchotvacs@jwllp.com>
Subject: Re: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

i'm sorry, i don't understand.

the financing for the film (concord is sticking by as funder)?

or

funding for you guys as you can/can't take this on?

thank you.

-alan

phone: 323 988 9692

peace and love.

On Jun 27, 2017, at 12:10 PM, Lew Loss <lloss@jwllp.com> wrote:

Alan:

As we look at this again, please update us on your access to the financing and your plans for proceeding. Thanks

Lew

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Monday, June 26, 2017 5:28 PM
To: Lew Loss <lloss@jwllp.com>
Cc: Charles Chotvacs <cchotvacs@jwllp.com>
Subject: Re: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

they are kicking this to the chubb group (original insurers up to 2011).

thank you.

-alan

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

peace and love.

On Jun 26, 2017, at 1:14 PM, Lew Loss <lloss@jwllp.com> wrote:

Thanks, Alan. We will review and provide our thoughts.

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Monday, June 26, 2017 4:06 PM
To: Lew Loss <lloss@jwllp.com>; Charles Chotvacs <cchotvacs@jwllp.com>
Subject: Fwd: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

thank you.

-alan

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

peace and love.

Begin forwarded message:

From: "Cope, Victoria" <Victoria.Cope@clydeco.us>
Date: June 26, 2017 at 1:03:58 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Cc: "Bertschi, Scott" <Scott.Bertschi@clydeco.us>, "maria.clark@aon.com" <maria.clark@aon.com>, Bodden Tara <Tara.Bodden@HISCOX.com>
Subject: **Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]**

Dear Mr. Elliott:

Please see the attached correspondence from Scott Bertschi in the above-referenced matter.

Should you have any questions or concerns, please do not hesitate to contact us.

Thank you,

Victoria Cope
Legal Administrative Assistant | Clyde & Co US LLP
Direct Dial: +1 404 410 3160 | Mobile: +1 404 374 5461

Please consider the environment before printing this e-mail.

This communication, including attachments, is confidential, may be subject to legal privileges, and is intended for the sole use of the addressee. Any use, duplication, disclosure, or dissemination of this communication, other than by the addressee, is prohibited. If you have received this communication in error, please notify the sender immediately and delete or destroy this communication and all copies.

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Re: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]
Date: June 27, 2017 at 12:25 PM
To: Lew Loss lloss@ljwllp.com
Cc: Charles Chotvacs cchotvacs@ljwllp.com



kinda.

we have a few (a lot) of opinion letters stating i can release the film.

the problem is:

i have an injunction in denver federal court which, when it is challenged, will put this:

- 1) i can sell and release the film
- 2) aretha franklin will, going forward, have to sue me to get any other remedy

underlying this is:

the need to have coverage to:

- 1) pay steve zansburg/jay brown (lawyers for denver)
- 2) insure smooth sailing going forward.

is that... clearer?

thank you.

-alan

phone: 323 988 9692

peace and love.

On Jun 27, 2017, at 12:19 PM, Lew Loss <lloss@ljwllp.com> wrote:

I am sorry if my email was too cryptic. Last I knew, as I recall, your funding source for the film distribution effort was tied to getting a letter from counsel expressing the view that you have the rights to distribute. If that money then came through, you would have a funding source for our efforts. If I don't have that quite correct, I apologize.

Thanks

Lew

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Tuesday, June 27, 2017 3:12 PM
To: Lew Loss <lloss@ljwllp.com>
Cc: Charles Chotvacs <cchotvacs@ljwllp.com>
Subject: Re: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

i'm sorry, i don't understand.

the financing for the film (concord is sticking by as funder)?

or

funding for you guys as you can/can't take this on?

thank you.

-alan

phone: 323 988 9692

peace and love.

On Jun 27, 2017, at 12:10 PM, Lew Loss <lloss@ljwllp.com> wrote:

Alan:

As we look at this again, please update us on your access to the financing and your plans for proceeding. Thanks

Lew

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Monday, June 26, 2017 5:28 PM
To: Lew Loss <lloss@ljwllp.com>
Cc: Charles Chotvacs <cchotvacs@ljwllp.com>
Subject: Re: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

they are kicking this to the chubb group (original insurers up to 2011).

thank you.

-alan

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

peace and love.

On Jun 26, 2017, at 1:14 PM, Lew Loss <loss@ljwllp.com> wrote:

Thanks, Alan. We will review and provide our thoughts.

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

Sent: Monday, June 26, 2017 4:06 PM

To: Lew Loss <loss@ljwllp.com>; Charles Chotvacs <cchotvacs@ljwllp.com>

Subject: Fwd: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

thank you.

-alan

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

peace and love.

Begin forwarded message:

From: "Cope, Victoria" <Victoria.Cope@clydeco.us>

Date: June 26, 2017 at 1:03:58 PM PDT

To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>

Cc: "Bertschi, Scott" <Scott.Bertschi@clydeco.us>, "maria.clark@aon.com" <maria.clark@aon.com>, Bodden Tara <Tara.Bodden@HISCOX.com>

Subject: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

Dear Mr. Elliott:

Please see the attached correspondence from Scott Bertschi in the above-referenced matter.

Should you have any questions or concerns, please do not hesitate to contact us.

Thank you,

Victoria Cope
Legal Administrative Assistant | Clyde & Co US LLP
Direct Dial: +1 404 410 3160 | Mobile: +1 404 374 5461

Please consider the environment before printing this e-mail.

This communication, including attachments, is confidential, may be subject to legal privileges, and is intended for the sole use of the addressee. Any use, duplication, disclosure, or dissemination of this communication, other than by the addressee, is prohibited. If you have received this communication in error, please notify the sender immediately and delete or destroy this communication and all copies.

From: Lew Loss lloss@jwllp.com
Subject: RE: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]
Date: June 27, 2017 at 12:30 PM
To: alan elliott (ucla) alanelliott@g.ucla.edu



I am not sure. It sounds as if you do not have the funding to pay us absent an insurance win? Is that right?

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Tuesday, June 27, 2017 3:25 PM
To: Lew Loss <lloss@jwllp.com>
Cc: Charles Chotvacs <cchotvacs@jwllp.com>
Subject: Re: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

kinda.

we have a few (a lot) of opinion letters stating i can release the film.

the problem is:

i have an injunction in denver federal court which, when it is challenged, will put this:

- 1) i can sell and release the film
- 2) aretha franklin will, going forward, have to sue me to get any other remedy

underlying this is:

the need to have coverage to:

- 1) pay steve zansburg/jay brown (lawyers for denver)
- 2) insure smooth sailing going forward.

is that... clearer?

thank you.

-alan

phone: 323 988 9692

peace and love.

On Jun 27, 2017, at 12:19 PM, Lew Loss <lloss@jwllp.com> wrote:

I am sorry if my email was too cryptic. Last I knew, as I recall, your funding source for the film distribution effort was tied to getting a letter from counsel expressing the view that you have the rights to distribute. If that money then came through, you would have a funding source for our efforts. If I don't have that quite correct, I apologize.

Thanks

Lew

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Tuesday, June 27, 2017 3:12 PM
To: Lew Loss <lloss@jwllp.com>
Cc: Charles Chotvacs <cchotvacs@jwllp.com>
Subject: Re: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

i'm sorry, i don't understand.

the financing for the film (concord is sticking by as funder)?

or

funding for you guys as you can/can't take this on?

thank you.

-alan

phone: 323 988 9692

peace and love.

On Jun 27, 2017, at 12:10 PM, Lew Loss <lloss@jwllp.com> wrote:

Alan:

As we look at this again, please update us on your access to the financing and your plans for proceeding. Thanks

Lew

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Monday, June 26, 2017 5:28 PM
To: Lew Loss <lloss@jwllp.com>
Cc: Charles Chotvacs <cchotvacs@jwllp.com>
Subject: Re: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

they are kicking this to the chubb group (original insurers up to 2011).

thank you.

-alan

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

peace and love.

On Jun 26, 2017, at 1:14 PM, Lew Loss <lloss@jwllp.com> wrote:

Thanks, Alan. We will review and provide our thoughts.

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Monday, June 26, 2017 4:06 PM
To: Lew Loss <lloss@jwllp.com>; Charles Chotvacs <cchotvacs@jwllp.com>
Subject: Fwd: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

thank you.

-alan

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

peace and love.

Begin forwarded message:

From: "Cope, Victoria" <Victoria.Cope@clydeco.us>
Date: June 26, 2017 at 1:03:58 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Cc: "Bertschi, Scott" <Scott.Bertschi@clydeco.us>, "maria.clark@aon.com" <maria.clark@aon.com>, Bodden Tara <Tara.Bodden@HISCOX.com>
Subject: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

Dear Mr. Elliott:

Please see the attached correspondence from Scott Bertschi in the above-referenced matter.

Should you have any questions or concerns, please do not hesitate to contact us.

Thank you,

Victoria Cope
Legal Administrative Assistant | Clyde & Co US LLP
Direct Dial: +1 404 410 3160 | Mobile: +1 404 374 5461

Please consider the environment before printing this e-mail.

This communication, including attachments, is confidential, may be subject to legal privileges, and is intended for the sole use of the addressee. Any use, duplication, disclosure, or dissemination of this communication, other than by the addressee, is prohibited. If you have received this communication in error, please notify the sender immediately and delete or destroy this communication and all copies.

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Re: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]
Date: June 27, 2017 at 12:31 PM
To: Lew Loss lloss@ljwllp.com



yes.
that is consistent since jay brown introduced us.
thank you.
-alan

phone: 323 988 9692

peace and love.

On Jun 27, 2017, at 12:30 PM, Lew Loss <lloss@ljwllp.com> wrote:

I am not sure. It sounds as if you do not have the funding to pay us absent an insurance win? Is that right?

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Tuesday, June 27, 2017 3:25 PM
To: Lew Loss <lloss@ljwllp.com>
Cc: Charles Chotvac <cchotvac@ljwllp.com>
Subject: Re: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

kinda.

we have a few (a lot) of opinion letters stating i can release the film.

the problem is:

i have an injunction in denver federal court which, when it is challenged, will put this:

- 1) i can sell and release the film
- 2) aretha franklin will, going forward, have to sue me to get any other remedy

underlying this is:

the need to have coverage to:

- 1) pay steve zansburg/jay brown (lawyers for denver)
- 2) insure smooth sailing going forward.

is that... clearer?

thank you.

-alan

phone: 323 988 9692

peace and love.

On Jun 27, 2017, at 12:19 PM, Lew Loss <lloss@ljwllp.com> wrote:

I am sorry if my email was too cryptic. Last I knew, as I recall, your funding source for the film distribution effort was tied to getting a letter from counsel expressing the view that you have the rights to distribute. If that money then came through, you would have a funding source for our efforts. If I don't have that quite correct, I apologize.

Thanks

Lew

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Tuesday, June 27, 2017 3:12 PM
To: Lew Loss <lloss@ljwllp.com>
Cc: Charles Chotvac <cchotvac@ljwllp.com>
Subject: Re: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

i'm sorry, i don't understand.

the financing for the film (concord is sticking by as funder)?

or

funding for you guys as you can/can't take this on?

thank you.

-alan

phone: **323 988 9692**

peace and love.

On Jun 27, 2017, at 12:10 PM, Lew Loss <lloss@jwllp.com> wrote:

Alan:

As we look at this again, please update us on your access to the financing and your plans for proceeding. Thanks

Lew

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Monday, June 26, 2017 5:28 PM
To: Lew Loss <lloss@jwllp.com>
Cc: Charles Chotvac <cchotvac@jwllp.com>
Subject: Re: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

they are kicking this to the chubb group (original insurers up to 2011).

thank you.

-alan

phone: **323 988 9692**

peace and love.

On Jun 26, 2017, at 1:14 PM, Lew Loss <lloss@jwllp.com> wrote:

Thanks, Alan. We will review and provide our thoughts.

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Monday, June 26, 2017 4:06 PM
To: Lew Loss <lloss@jwllp.com>; Charles Chotvac <cchotvac@jwllp.com>
Subject: Fwd: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

thank you.

-alan

phone: **323 988 9692**

peace and love.

Begin forwarded message:

From: "Cope, Victoria" <Victoria.Cope@clydeco.us>
Date: June 26, 2017 at 1:03:58 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Cc: "Bertschi, Scott" <Scott.Bertschi@clydeco.us>, "maria.clark@aon.com" <maria.clark@aon.com>, Bodden Tara <Tara.Bodden@HISCOX.com>
Subject: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

Dear Mr. Elliott:

Please see the attached correspondence from Scott Bertschi in the above-referenced matter.

Should you have any questions or concerns, please do not hesitate to contact us.

Thank you,

Victoria Cope
Legal Administrative Assistant | Clyde & Co US LLP
Direct Dial: +1 404 410 3160 | Mobile: +1 404 374 5461

Please consider the environment before printing this e-mail.

This communication, including attachments, is confidential, may be subject to legal privileges, and is intended for the sole use of the addressee. Any use, duplication, disclosure, or dissemination of this communication, other than by the addressee, is prohibited. If you have received this communication in error, please notify the sender immediately and delete or destroy this communication and all copies.

From: Lew Loss lloss@ljwllp.com
Subject: RE: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]
Date: June 27, 2017 at 12:41 PM
To: alan elliott (ucla) alanelliott@g.ucla.edu



Thanks, Alan. Actually, I had understood that the funding source would release the funds if you demonstrated your right to proceed and that those funds would be sufficient to pay us and handle your other expenses, but I may have misunderstood that. We will, as promised, review the latest letter and circle back with some thoughts. Clearly, Hiscox has not changed its position on its willingness to pay.

Best,

Lew

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Tuesday, June 27, 2017 3:32 PM
To: Lew Loss <lloss@ljwllp.com>
Subject: Re: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

yes.

that is consistent since jay brown introduced us.

thank you.

-alan

phone: 323 988 9692

peace and love.

On Jun 27, 2017, at 12:30 PM, Lew Loss <lloss@ljwllp.com> wrote:

I am not sure. It sounds as if you do not have the funding to pay us absent an insurance win? Is that right?

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Tuesday, June 27, 2017 3:25 PM
To: Lew Loss <lloss@ljwllp.com>
Cc: Charles Chotvacs <cchotvacs@ljwllp.com>
Subject: Re: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

kinda.

we have a few (a lot) of opinion letters stating i can release the film.

the problem is:

i have an injunction in denver federal court which, when it is challenged, will put this:

- 1) i can sell and release the film
- 2) aretha franklin will, going forward, have to sue me to get any other remedy

underlying this is:

the need to have coverage to:

- 1) pay steve zansburg/jay brown (lawyers for denver)
- 2) insure smooth sailing going forward.

is that... clearer?

thank you.

-alan

phone: 323 988 9692

peace and love.

On Jun 27, 2017, at 12:19 PM, Lew Loss <lloss@ljwllp.com> wrote:

I am sorry if my email was too cryptic. Last I knew, as I recall, your funding source for the film distribution effort was tied to getting a letter from counsel expressing the view that you have the rights to distribute. If that money then came through, you would have a funding source for our efforts. If I don't have that quite correct, I apologize.

Thanks

Lew

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Tuesday, June 27, 2017 3:12 PM

To: Lew Loss <lloss@jwllp.com>
Cc: Charles Chotvacs <cchotvacs@jwllp.com>
Subject: Re: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

i'm sorry, i don't understand.

the financing for the film (concord is sticking by as funder)?

or

funding for you guys as you can/can't take this on?

thank you.

-alan

phone: 323 988 9692

peace and love.

On Jun 27, 2017, at 12:10 PM, Lew Loss <lloss@jwllp.com> wrote:

Alan:

As we look at this again, please update us on your access to the financing and your plans for proceeding. Thanks

Lew

From: alan elliott (ucla) [<mailto:alaneliott@g.ucla.edu>]
Sent: Monday, June 26, 2017 5:28 PM
To: Lew Loss <lloss@jwllp.com>
Cc: Charles Chotvacs <cchotvacs@jwllp.com>
Subject: Re: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

they are kicking this to the chubb group (original insurers up to 2011).

thank you.

-alan

phone: 323 988 9692

peace and love.

On Jun 26, 2017, at 1:14 PM, Lew Loss <lloss@jwllp.com> wrote:

Thanks, Alan. We will review and provide our thoughts.

From: alan elliott (ucla) [<mailto:alaneliott@g.ucla.edu>]
Sent: Monday, June 26, 2017 4:06 PM
To: Lew Loss <lloss@jwllp.com>; Charles Chotvacs <cchotvacs@jwllp.com>
Subject: Fwd: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

thank you.

-alan

phone: 323 988 9692

peace and love.

Begin forwarded message:

From: "Cope, Victoria" <Victoria.Cope@clydeco.us>
Date: June 26, 2017 at 1:03:58 PM PDT
To: "alaneliott@g.ucla.edu" <alaneliott@g.ucla.edu>
Cc: "Bertschi, Scott" <Scott.Bertschi@clydeco.us>, "maria.clark@aon.com" <maria.clark@aon.com>, Bodden Tara <Tara.Bodden@HISCOX.com>
Subject: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

Dear Mr. Elliott:

Please see the attached correspondence from Scott Bertschi in the above-referenced matter.

Should you have any questions or concerns, please do not hesitate to contact us.

Thank you,

Victoria Cope
Legal Administrative Assistant | Clyde & Co US LLP
Direct Dial: +1 404 410 3160 | Mobile: +1 404 374 5461

Please consider the environment before printing this e-mail.

This communication, including attachments, is confidential, may be subject to legal privileges, and is intended for the sole use of the addressee. Any use, duplication, disclosure, or dissemination of this communication, other than by the addressee, is prohibited. If you have received this communication in error, please notify the sender immediately and delete or destroy this communication and all copies.

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Fwd: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]
Date: June 27, 2017 at 6:06 PM
To: Robert Johnson raj@ineteconomics.org



thank you.
-alan

phone: [323 988 9692](tel:3239889692)
peace and love.

Begin forwarded message:

From: Lew Loss <lloss@ljwllp.com>
Date: June 27, 2017 at 12:41:52 PM PDT
To: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Subject: RE: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

Thanks, Alan. Actually, I had understood that the funding source would release the funds if you demonstrated your right to proceed and that those funds would be sufficient to pay us and handle your other expenses, but I may have misunderstood that. We will, as promised, review the latest letter and circle back with some thoughts. Clearly, Hiscox has not changed its position on its willingness to pay.

Best,

Lew

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Tuesday, June 27, 2017 3:32 PM
To: Lew Loss <lloss@ljwllp.com>
Subject: Re: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

yes.

that is consistent since jay brown introduced us.

thank you.
-alan

phone: 323 988 9692

peace and love.

On Jun 27, 2017, at 12:30 PM, Lew Loss <lloss@ljwllp.com> wrote:

I am not sure. It sounds as if you do not have the funding to pay us absent an insurance win? Is that right?

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Tuesday, June 27, 2017 3:25 PM
To: Lew Loss <lloss@ljwllp.com>
Cc: Charles Chotvacs <cchotvacs@ljwllp.com>
Subject: Re: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

kinda.

we have a few (a lot) of opinion letters stating i can release the film.

the problem is:

i have an injunction in denver federal court which, when it is challenged, will put this:

- 1) i can sell and release the film
- 2) aretha franklin will, going forward, have to sue me to get any other remedy

underlying this is:

the need to have coverage to:

- 1) pay steve zansburg/jay brown (lawyers for denver)
- 2) insure smooth sailing going forward.

is that... clearer?

thank you.
-alan

phone: 323 988 9692

peace and love.

On Jun 27, 2017, at 12:19 PM, Lew Loss <lloss@ljwllp.com> wrote:

I am sorry if my email was too cryptic. Last I knew, as I recall, your funding source for the film distribution effort was tied to getting a letter from counsel expressing the view that you have the rights to distribute. If that money then came through, you would have a funding source for our efforts. If I don't have that quite correct, I apologize.

Thanks

Lew

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Tuesday, June 27, 2017 3:12 PM
To: Lew Loss <lloss@jwllp.com>
Cc: Charles Chotvacs <cchotvacs@jwllp.com>
Subject: Re: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

i'm sorry, i don't understand.

the financing for the film (concord is sticking by as funder)?

or

funding for you guys as you can/can't take this on?

thank you.

-alan

phone: 323 988 9692

peace and love.

On Jun 27, 2017, at 12:10 PM, Lew Loss <lloss@jwllp.com> wrote:

Alan:

As we look at this again, please update us on your access to the financing and your plans for proceeding. Thanks

Lew

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Monday, June 26, 2017 5:28 PM
To: Lew Loss <lloss@jwllp.com>
Cc: Charles Chotvacs <cchotvacs@jwllp.com>
Subject: Re: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

they are kicking this to the chubb group (original insurers up to 2011).

thank you.

-alan

phone: 323 988 9692

peace and love.

On Jun 26, 2017, at 1:14 PM, Lew Loss <lloss@jwllp.com> wrote:

Thanks, Alan. We will review and provide our thoughts.

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Monday, June 26, 2017 4:06 PM
To: Lew Loss <lloss@jwllp.com>; Charles Chotvacs <cchotvacs@jwllp.com>
Subject: Fwd: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

thank you.

-alan

phone: 323 988 9692

peace and love.

Begin forwarded message:

From: "Cope, Victoria" <Victoria.Cope@clydeco.us>
Date: June 26, 2017 at 1:03:58 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Cc: "Bertschi, Scott" <Scott.Bertschi@clydeco.us>, "maria.clark@aon.com" <maria.clark@aon.com>, Bodden Tara <Tara.Bodden@HISCOX.com>
Subject: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

Dear Mr. Elliott:

Please see the attached correspondence from Scott Bertschi in the above-referenced matter.

Should you have any questions or concerns, please do not hesitate to contact us.

Thank you,

Victoria Cope
Legal Administrative Assistant | Clyde & Co US LLP
Direct Dial: +1 404 410 3160 | Mobile: +1 404 374 5461

Please consider the environment before printing this e-mail.

This communication, including attachments, is confidential, may be subject to legal privileges, and is intended for the sole use of the addressee. Any use, duplication, disclosure, or dissemination of this communication, other than by the addressee, is prohibited. If you have received this communication in error, please notify the sender immediately and delete or destroy this communication and all copies.

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Fwd: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]
Date: June 27, 2017 at 6:07 PM
To: Steven Zansberg SZansberg@lskslaw.com, Jay Brown jbrown@lskslaw.com



thank you.
-alan

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

peace and love.

Begin forwarded message:

From: Lew Loss <lloss@ljlwlp.com>
Date: June 27, 2017 at 12:41:52 PM PDT
To: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Subject: RE: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

Thanks, Alan. Actually, I had understood that the funding source would release the funds if you demonstrated your right to proceed and that those funds would be sufficient to pay us and handle your other expenses, but I may have misunderstood that. We will, as promised, review the latest letter and circle back with some thoughts. Clearly, Hiscox has not changed its position on its willingness to pay.

Best,

Lew

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Tuesday, June 27, 2017 3:32 PM
To: Lew Loss <lloss@ljlwlp.com>
Subject: Re: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

yes.

that is consistent since jay brown introduced us.

thank you.

-alan

phone: 323 988 9692

peace and love.

On Jun 27, 2017, at 12:30 PM, Lew Loss <lloss@ljlwlp.com> wrote:

I am not sure. It sounds as if you do not have the funding to pay us absent an insurance win? Is that right?

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Tuesday, June 27, 2017 3:25 PM
To: Lew Loss <lloss@ljlwlp.com>
Cc: Charles Chotvacs <cchotvacs@ljlwlp.com>
Subject: Re: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

kinda.

we have a few (a lot) of opinion letters stating i can release the film.

the problem is:

i have an injunction in denver federal court which, when it is challenged, will put this:

- 1) i can sell and release the film
- 2) aretha franklin will, going forward, have to sue me to get any other remedy

underlying this is:

the need to have coverage to:

- 1) pay steve zansburg/jay brown (lawyers for denver)
- 2) insure smooth sailing going forward.

is that... clearer?

thank you.

-alan

phone: 323 988 9692

peace and love.

On Jun 27, 2017, at 12:19 PM, Lew Loss <lloss@ljlwlp.com> wrote:

I am sorry if my email was too cryptic. Last I knew, as I recall, your funding source for the film distribution effort was tied to getting a letter from counsel expressing the view that you have the rights to distribute. If that money then came through, you would have a funding source for our efforts. If I don't have that quite correct, I apologize.

Thanks

Lew

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Tuesday, June 27, 2017 3:12 PM
To: Lew Loss <lloss@jwllp.com>
Cc: Charles Chotvacs <cchotvacs@jwllp.com>
Subject: Re: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

i'm sorry, i don't understand.

the financing for the film (concord is sticking by as funder)?

or

funding for you guys as you can/can't take this on?

thank you.

-alan

phone: 323 988 9692

peace and love.

On Jun 27, 2017, at 12:10 PM, Lew Loss <lloss@jwllp.com> wrote:

Alan:

As we look at this again, please update us on your access to the financing and your plans for proceeding. Thanks

Lew

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Monday, June 26, 2017 5:28 PM
To: Lew Loss <lloss@jwllp.com>
Cc: Charles Chotvacs <cchotvacs@jwllp.com>
Subject: Re: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

they are kicking this to the chubb group (original insurers up to 2011).

thank you.

-alan

phone: 323 988 9692

peace and love.

On Jun 26, 2017, at 1:14 PM, Lew Loss <lloss@jwllp.com> wrote:

Thanks, Alan. We will review and provide our thoughts.

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Monday, June 26, 2017 4:06 PM
To: Lew Loss <lloss@jwllp.com>; Charles Chotvacs <cchotvacs@jwllp.com>
Subject: Fwd: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

thank you.

-alan

phone: 323 988 9692

peace and love.

Begin forwarded message:

From: "Cope, Victoria" <Victoria.Cope@clydeco.us>
Date: June 26, 2017 at 1:03:58 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Cc: "Bertschi, Scott" <Scott.Bertschi@clydeco.us>, "maria.clark@aon.com" <maria.clark@aon.com>, Bodden Tara <Tara.Bodden@HISCOX.com>
Subject: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

Dear Mr. Elliott:

Please see the attached correspondence from Scott Bertschi in the above-referenced matter.

Should you have any questions or concerns, please do not hesitate to contact us.

Thank you,

Victoria Cope
Legal Administrative Assistant | Clyde & Co US LLP
Direct Dial: +1 404 410 3160 | Mobile: +1 404 374 5461

Please consider the environment before printing this e-mail.

This communication, including attachments, is confidential, may be subject to legal privileges, and is intended for the sole use of the addressee. Any use, duplication, disclosure, or dissemination of this communication, other than by the addressee, is prohibited. If you have received this communication in error, please notify the sender immediately and delete or destroy this communication and all copies.

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Fwd: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]
Date: June 27, 2017 at 6:07 PM
To: Todd W. Musburger todd@musburger.com



thank you.
-alan

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

peace and love.

Begin forwarded message:

From: Lew Loss <lloss@ljwllp.com>
Date: June 27, 2017 at 12:41:52 PM PDT
To: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Subject: RE: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

Thanks, Alan. Actually, I had understood that the funding source would release the funds if you demonstrated your right to proceed and that those funds would be sufficient to pay us and handle your other expenses, but I may have misunderstood that. We will, as promised, review the latest letter and circle back with some thoughts. Clearly, Hiscox has not changed its position on its willingness to pay.

Best,

Lew

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Tuesday, June 27, 2017 3:32 PM
To: Lew Loss <lloss@ljwllp.com>
Subject: Re: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

yes.

that is consistent since jay brown introduced us.

thank you.

-alan

phone: 323 988 9692

peace and love.

On Jun 27, 2017, at 12:30 PM, Lew Loss <lloss@ljwllp.com> wrote:

I am not sure. It sounds as if you do not have the funding to pay us absent an insurance win? Is that right?

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Tuesday, June 27, 2017 3:25 PM
To: Lew Loss <lloss@ljwllp.com>
Cc: Charles Chotvacs <cchotvacs@ljwllp.com>
Subject: Re: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

kinda.

we have a few (a lot) of opinion letters stating i can release the film.

the problem is:

i have an injunction in denver federal court which, when it is challenged, will put this:

- 1) i can sell and release the film
- 2) aretha franklin will, going forward, have to sue me to get any other remedy

underlying this is:

the need to have coverage to:

- 1) pay steve zansburg/jay brown (lawyers for denver)
- 2) insure smooth sailing going forward.

is that... clearer?

thank you.

-alan

phone: 323 988 9692

peace and love.

On Jun 27, 2017, at 12:19 PM, Lew Loss <lloss@ljwllp.com> wrote:

I am sorry if my email was too cryptic. Last I knew, as I recall, your funding source for the film distribution effort was tied to getting a letter from counsel expressing the view that you have the rights to distribute. If that money then came through, you would have a funding source for our efforts. If I don't have that quite correct, I apologize.

Thanks

Lew

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Tuesday, June 27, 2017 3:12 PM
To: Lew Loss <lloss@jwllp.com>
Cc: Charles Chotvacs <cchotvacs@jwllp.com>
Subject: Re: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

i'm sorry, i don't understand.

the financing for the film (concord is sticking by as funder)?

or

funding for you guys as you can/can't take this on?

thank you.

-alan

phone: 323 988 9692

peace and love.

On Jun 27, 2017, at 12:10 PM, Lew Loss <lloss@jwllp.com> wrote:

Alan:

As we look at this again, please update us on your access to the financing and your plans for proceeding. Thanks

Lew

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Monday, June 26, 2017 5:28 PM
To: Lew Loss <lloss@jwllp.com>
Cc: Charles Chotvacs <cchotvacs@jwllp.com>
Subject: Re: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

they are kicking this to the chubb group (original insurers up to 2011).

thank you.

-alan

phone: 323 988 9692

peace and love.

On Jun 26, 2017, at 1:14 PM, Lew Loss <lloss@jwllp.com> wrote:

Thanks, Alan. We will review and provide our thoughts.

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Monday, June 26, 2017 4:06 PM
To: Lew Loss <lloss@jwllp.com>; Charles Chotvacs <cchotvacs@jwllp.com>
Subject: Fwd: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

thank you.

-alan

phone: 323 988 9692

peace and love.

Begin forwarded message:

From: "Cope, Victoria" <Victoria.Cope@clydeco.us>
Date: June 26, 2017 at 1:03:58 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Cc: "Bertschi, Scott" <Scott.Bertschi@clydeco.us>, "maria.clark@aon.com" <maria.clark@aon.com>, Bodden Tara <Tara.Bodden@HISCOX.com>
Subject: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

Dear Mr. Elliott:

Please see the attached correspondence from Scott Bertschi in the above-referenced matter.

Should you have any questions or concerns, please do not hesitate to contact us.

Thank you,

Victoria Cope
Legal Administrative Assistant | Clyde & Co US LLP
Direct Dial: +1 404 410 3160 | Mobile: +1 404 374 5461

Please consider the environment before printing this e-mail.

This communication, including attachments, is confidential, may be subject to legal privileges, and is intended for the sole use of the addressee. Any use, duplication, disclosure, or dissemination of this communication, other than by the addressee, is prohibited. If you have received this communication in error, please notify the sender immediately and delete or destroy this communication and all copies.

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Fwd: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]
Date: June 26, 2017 at 1:06 PM
To: Todd W. Musburger todd@musburger.com



thank you.

-alan

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

peace and love.

Begin forwarded message:

From: "Cope, Victoria" <Victoria.Cope@clydeco.us>
Date: June 26, 2017 at 1:03:58 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Cc: "Bertschi, Scott" <Scott.Bertschi@clydeco.us>, "maria.clark@aon.com" <maria.clark@aon.com>, Bodden Tara <Tara.Bodden@HISCOX.com>
Subject: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

Dear Mr. Elliott:

Please see the attached correspondence from Scott Bertschi in the above-referenced matter.

Should you have any questions or concerns, please do not hesitate to contact us.

Thank you,

Victoria Cope
Legal Administrative Assistant | Clyde & Co US LLP
Direct Dial: +1 404 410 3160 | Mobile: +1 404 374 5461

CLYDE & CO

271 17th Street | Suite 1720 | Atlanta | GA 30363 | USA
Main +1 404 410 3150 | Fax +1 404 410 3151 | www.clydeco.us

This email message and any attachments may contain legally privileged and/or confidential information intended solely for the use of the individual or entity to whom it is addressed. If the reader of this message is not the intended recipient, you are hereby notified that any reading, dissemination, distribution or copying of this message or its attachments is strictly prohibited. If you have received this email message in error, please immediately notify us by telephone, fax or email and delete the message and all attachments thereto. Thank you. Clyde & Co US LLP is a Delaware limited liability law partnership affiliated with Clyde & Co LLP, a multinational partnership regulated by The Law Society of England and Wales.

Disclosure: To ensure compliance with requirements imposed by the IRS in Circular 230, we inform you that any tax advice contained in this communication (including any attachment that does not explicitly state otherwise) is not intended or written to be used, and cannot be used, for the purpose of avoiding penalties under the Internal Revenue Code or promoting, marketing or recommending to another party any transaction or matter addressed herein.



Hiscox_Amazing
Grace...7).PDF

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Fwd: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]
Date: June 26, 2017 at 1:06 PM
To: scott pascucci scottpascucci@concordbicycle.com, Larry Blake Larry.Blake@concordmusicgroup.com



thank you.

-alan

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

peace and love.

Begin forwarded message:

From: "Cope, Victoria" <Victoria.Cope@clydeco.us>
Date: June 26, 2017 at 1:03:58 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Cc: "Bertschi, Scott" <Scott.Bertschi@clydeco.us>, "maria.clark@aon.com" <maria.clark@aon.com>, Bodden Tara <Tara.Bodden@HISCOX.com>
Subject: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

Dear Mr. Elliott:

Please see the attached correspondence from Scott Bertschi in the above-referenced matter.

Should you have any questions or concerns, please do not hesitate to contact us.

Thank you,

Victoria Cope
Legal Administrative Assistant | Clyde & Co US LLP
Direct Dial: +1 404 410 3160 | Mobile: +1 404 374 5461

CLYDE & CO

271 17th Street | Suite 1720 | Atlanta | GA 30363 | USA
Main +1 404 410 3150 | Fax +1 404 410 3151 | www.clydeco.us

This email message and any attachments may contain legally privileged and/or confidential information intended solely for the use of the individual or entity to whom it is addressed. If the reader of this message is not the intended recipient, you are hereby notified that any reading, dissemination, distribution or copying of this message or its attachments is strictly prohibited. If you have received this email message in error, please immediately notify us by telephone, fax or email and delete the message and all attachments thereto. Thank you. Clyde & Co US LLP is a Delaware limited liability law partnership affiliated with Clyde & Co LLP, a multinational partnership regulated by The Law Society of England and Wales.

Disclosure: To ensure compliance with requirements imposed by the IRS in Circular 230, we inform you that any tax advice contained in this communication (including any attachment that does not explicitly state otherwise) is not intended or written to be used, and cannot be used, for the purpose of avoiding penalties under the Internal Revenue Code or promoting, marketing or recommending to another party any transaction or matter addressed herein.



Hiscox_Amazing
Grace...7).PDF

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Fwd: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]
Date: June 26, 2017 at 1:07 PM
To: Shaun H. Crosner scrosner@linerlaw.com



thank you.

-alan

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

peace and love.

Begin forwarded message:

From: "Cope, Victoria" <Victoria.Cope@clydeco.us>
Date: June 26, 2017 at 1:03:58 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Cc: "Bertschi, Scott" <Scott.Bertschi@clydeco.us>, "maria.clark@aon.com" <maria.clark@aon.com>, Bodden Tara <Tara.Bodden@HISCOX.com>
Subject: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

Dear Mr. Elliott:

Please see the attached correspondence from Scott Bertschi in the above-referenced matter.

Should you have any questions or concerns, please do not hesitate to contact us.

Thank you,

Victoria Cope
Legal Administrative Assistant | Clyde & Co US LLP
Direct Dial: +1 404 410 3160 | Mobile: +1 404 374 5461

CLYDE & CO

271 17th Street | Suite 1720 | Atlanta | GA 30363 | USA
Main +1 404 410 3150 | Fax +1 404 410 3151 | www.clydeco.us

This email message and any attachments may contain legally privileged and/or confidential information intended solely for the use of the individual or entity to whom it is addressed. If the reader of this message is not the intended recipient, you are hereby notified that any reading, dissemination, distribution or copying of this message or its attachments is strictly prohibited. If you have received this email message in error, please immediately notify us by telephone, fax or email and delete the message and all attachments thereto. Thank you. Clyde & Co US LLP is a Delaware limited liability law partnership affiliated with Clyde & Co LLP, a multinational partnership regulated by The Law Society of England and Wales.

Disclosure: To ensure compliance with requirements imposed by the IRS in Circular 230, we inform you that any tax advice contained in this communication (including any attachment that does not explicitly state otherwise) is not intended or written to be used, and cannot be used, for the purpose of avoiding penalties under the Internal Revenue Code or promoting, marketing or recommending to another party any transaction or matter addressed herein.



Hiscox_Amazing
Grace...7).PDF

From: Lew Loss lloss@ljwllp.com
Subject: RE: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]
Date: June 26, 2017 at 1:15 PM
To: alan elliott (ucla) alanelliott@g.ucla.edu, Charles Chotvac cchotvac@ljwllp.com



Thanks, Alan. We will review and provide our thoughts.

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Monday, June 26, 2017 4:06 PM
To: Lew Loss <lloss@ljwllp.com>; Charles Chotvac <cchotvac@ljwllp.com>
Subject: Fwd: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

thank you.

-alan

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

peace and love.

Begin forwarded message:

From: "Cope, Victoria" <Victoria.Cope@clydeco.us>
Date: June 26, 2017 at 1:03:58 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Cc: "Bertschi, Scott" <Scott.Bertschi@clydeco.us>, "maria.clark@aon.com" <maria.clark@aon.com>, Bodden Tara <Tara.Bodden@HISCOX.com>
Subject: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

Dear Mr. Elliott:

Please see the attached correspondence from Scott Bertschi in the above-referenced matter.

Should you have any questions or concerns, please do not hesitate to contact us.

Thank you,

Victoria Cope
Legal Administrative Assistant | Clyde & Co US LLP
Direct Dial: +1 404 410 3160 | Mobile: +1 404 374 5461

Please consider the environment before printing this e-mail.

This communication, including attachments, is confidential, may be subject to legal privileges, and is intended for the sole use of the addressee. Any use, duplication, disclosure, or dissemination of this communication, other than by the addressee, is prohibited. If you have received this communication in error, please notify the sender immediately and delete or destroy this communication and all copies.

From: Todd Musburger todd@musburger.com
Subject: Re: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]
Date: June 26, 2017 at 1:29 PM
To: alan elliott (ucla) alanelliott@g.ucla.edu

TM

and so it goes...we live to fight another day...

Todd W. Musburger
Todd W. Musburger, Ltd.
142 E. Ontario
Suite 500
Chicago, Illinois 60611
312 664 2600

On Mon, Jun 26, 2017 at 3:06 PM, alan elliott (ucla) <alanelliott@g.ucla.edu> wrote:

thank you.

-alan

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

peace and love.

Begin forwarded message:

From: "Cope, Victoria" <Victoria.Cope@clydeco.us>
Date: June 26, 2017 at 1:03:58 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Cc: "Bertschi, Scott" <Scott.Bertschi@clydeco.us>, "maria.clark@aon.com" <maria.clark@aon.com>, Bodden Tara <Tara.Bodden@HISCOX.com>
Subject: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

Dear Mr. Elliott:

Please see the attached correspondence from Scott Bertschi in the above-referenced matter.

Should you have any questions or concerns, please do not hesitate to contact us.

Thank you,

Victoria Cope
Legal Administrative Assistant | Clyde & Co US LLP
Direct Dial: [+1 404 410 3160](tel:+14044103160) | **Mobile:** [+1 404 374 5461](tel:+14043745461)

271 17th Street | Suite 1720 | Atlanta | GA 30363 | USA
Main [+1 404 410 3150](tel:+14044103150) | **Fax** [+1 404 410 3151](tel:+14044103151) | www.clydeco.us

This email message and any attachments may contain legally privileged and/or confidential information intended solely for the use of the individual or entity to whom it is addressed. If the reader of this message is not the intended recipient, you are hereby notified that any reading, dissemination, distribution or copying of this message or its attachments is strictly prohibited. If you have received this email message in error, please immediately notify us by telephone, fax or email and delete the message and all attachments thereto. Thank you. Clyde & Co US LLP is a Delaware limited liability law partnership affiliated with Clyde & Co LLP, a multinational partnership regulated by The Law Society of England and Wales.

Disclosure: To ensure compliance with requirements imposed by the IRS in Circular 230, we inform you that any tax advice contained in this communication (including any attachment that does not explicitly state otherwise) is not intended or written to be used, and cannot be used, for the purpose of avoiding penalties under the Internal Revenue Code or promoting, marketing or recommending to another party any transaction or matter addressed herein.

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Re: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]
Date: June 26, 2017 at 2:27 PM
To: Low Loss lloss@ljwllp.com
Cc: Charles Chotvacs cchotvacs@ljwllp.com



they are kicking this to the chubb group (original insurers up to 2011).

thank you.

-alan

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

peace and love.

On Jun 26, 2017, at 1:14 PM, Low Loss <lloss@ljwllp.com> wrote:

Thanks, Alan. We will review and provide our thoughts.

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Monday, June 26, 2017 4:06 PM
To: Low Loss <lloss@ljwllp.com>; Charles Chotvacs <cchotvacs@ljwllp.com>
Subject: Fwd: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

thank you.

-alan

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

peace and love.

Begin forwarded message:

From: "Cope, Victoria" <Victoria.Cope@clydeco.us>
Date: June 26, 2017 at 1:03:58 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Cc: "Bertschi, Scott" <Scott.Bertschi@clydeco.us>, "maria.clark@aon.com" <maria.clark@aon.com>, Bodden Tara <Tara.Bodden@HISCOX.com>
Subject: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

Dear Mr. Elliott:

Please see the attached correspondence from Scott Bertschi in the above-referenced matter.

Should you have any questions or concerns, please do not hesitate to contact us.

Thank you,

Victoria Cope
Legal Administrative Assistant | Clyde & Co US LLP
Direct Dial: +1 404 410 3160 | Mobile: +1 404 374 5461

Please consider the environment before printing this e-mail.

This communication, including attachments, is confidential, may be subject to legal privileges, and is intended for the sole use of the addressee. Any use, duplication, disclosure, or dissemination of this communication, other than by the addressee, is prohibited. If you have received this communication in error, please notify the sender immediately and delete or destroy this communication and all copies.

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Re: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]
Date: June 26, 2017 at 4:56 PM
To: Jay Brown jbrown@lskslaw.com, Steven Zansberg szansberg@lskslaw.com



they are kicking this to the chubb group (original insurers up to 2011).

here's a question:

does your firm have a conflict with chubb?

thank you.

-alan

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

peace and love.

Begin forwarded message:

From: "Cope, Victoria" <Victoria.Cope@clydeco.us>
Date: June 26, 2017 at 1:03:58 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Cc: "Bertschi, Scott" <Scott.Bertschi@clydeco.us>, "maria.clark@aon.com" <maria.clark@aon.com>, Bodden Tara <Tara.Bodden@HISCOX.com>
Subject: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

Dear Mr. Elliott:

Please see the attached correspondence from Scott Bertschi in the above-referenced matter.

Should you have any questions or concerns, please do not hesitate to contact us.

Thank you,

Victoria Cope
Legal Administrative Assistant | Clyde & Co US LLP
Direct Dial: +1 404 410 3160 | Mobile: +1 404 374 5461

Please consider the environment before printing this e-mail.

This communication, including attachments, is confidential, may be subject to legal privileges, and is intended for the sole use of the addressee. Any use, duplication, disclosure, or dissemination of this communication, other than by the addressee, is prohibited. If you have received this communication in error, please notify the sender immediately and delete or destroy this communication and all copies.

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Re: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]
Date: June 27, 2017 at 2:24 PM
To: Lew Loss lloss@ljwllp.com



thank you.
-alan

phone: 323 988 9692

peace and love.

On Jun 27, 2017, at 12:41 PM, Lew Loss <lloss@ljwllp.com> wrote:

Thanks, Alan. Actually, I had understood that the funding source would release the funds if you demonstrated your right to proceed and that those funds would be sufficient to pay us and handle your other expenses, but I may have misunderstood that. We will, as promised, review the latest letter and circle back with some thoughts. Clearly, Hiscox has not changed its position on its willingness to pay.

Best,

Lew

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Tuesday, June 27, 2017 3:32 PM
To: Lew Loss <lloss@ljwllp.com>
Subject: Re: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

yes.

that is consistent since jay brown introduced us.

thank you.

-alan

phone: 323 988 9692

peace and love.

On Jun 27, 2017, at 12:30 PM, Lew Loss <lloss@ljwllp.com> wrote:

I am not sure. It sounds as if you do not have the funding to pay us absent an insurance win? Is that right?

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Tuesday, June 27, 2017 3:25 PM
To: Lew Loss <lloss@ljwllp.com>
Cc: Charles Chotvacs <cchotvacs@ljwllp.com>
Subject: Re: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

kinda.

we have a few (a lot) of opinion letters stating i can release the film.

the problem is:

i have an injunction in denver federal court which, when it is challenged, will put this:

- 1) i can sell and release the film
- 2) aretha franklin will, going forward, have to sue me to get any other remedy

underlying this is:

the need to have coverage to:

- 1) pay steve zansburg/jay brown (lawyers for denver)
- 2) insure smooth sailing going forward.

is that... clearer?

thank you.

-alan

phone: 323 988 9692

peace and love.

On Jun 27, 2017, at 12:19 PM, Lew Loss <lloss@ljwllp.com> wrote:

I am sorry if my email was too cryptic. Last I knew, as I recall, your funding source for the film distribution effort was tied to getting a letter from counsel

expressing the view that you have the rights to distribute. If that money then came through, you would have a funding source for our efforts. If I don't have that quite correct, I apologize.

Thanks

Lew

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Tuesday, June 27, 2017 3:12 PM
To: Lew Loss <lloss@jwllp.com>
Cc: Charles Chotvacs <cchotvacs@jwllp.com>
Subject: Re: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

i'm sorry, i don't understand.

the financing for the film (concord is sticking by as funder)?

or

funding for you guys as you can/can't take this on?

thank you.

-alan

phone: 323 988 9692

peace and love.

On Jun 27, 2017, at 12:10 PM, Lew Loss <lloss@jwllp.com> wrote:

Alan:

As we look at this again, please update us on your access to the financing and your plans for proceeding. Thanks

Lew

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Monday, June 26, 2017 5:28 PM
To: Lew Loss <lloss@jwllp.com>
Cc: Charles Chotvacs <cchotvacs@jwllp.com>
Subject: Re: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

they are kicking this to the chubb group (original insurers up to 2011).

thank you.

-alan

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

peace and love.

On Jun 26, 2017, at 1:14 PM, Lew Loss <lloss@jwllp.com> wrote:

Thanks, Alan. We will review and provide our thoughts.

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Monday, June 26, 2017 4:06 PM
To: Lew Loss <lloss@jwllp.com>; Charles Chotvacs <cchotvacs@jwllp.com>
Subject: Fwd: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

thank you.

-alan

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

peace and love.

Begin forwarded message:

From: "Cope, Victoria" <Victoria.Cope@clydeco.us>
Date: June 26, 2017 at 1:03:58 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Cc: "Bertschi, Scott" <Scott.Bertschi@clydeco.us>, "maria.clark@aon.com" <maria.clark@aon.com>, Bodden Tara <Tara.Bodden@HISCOX.com>
Subject: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]

Dear Mr. Elliott:

Please see the attached correspondence from Scott Bertschi in the above-referenced matter.

Should you have any questions or concerns, please do not hesitate to contact us.

Thank you,

Victoria Cope
Legal Administrative Assistant | Clyde & Co US LLP
Direct Dial: +1 404 410 3160 | **Mobile:** +1 404 374 5461

Please consider the environment before printing this e-mail.

This communication, including attachments, is confidential, may be subject to legal privileges, and is intended for the sole use of the addressee. Any use, duplication, disclosure, or dissemination of this communication, other than by the addressee, is prohibited. If you have received this communication in error, please notify the sender immediately and delete or destroy this communication and all copies.

From: Cope, Victoria Victoria.Cope@clydeco.us 
Subject: Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802]
Date: June 26, 2017 at 1:03 PM
To: alanelliott@g.ucla.edu
Cc: Bertschi, Scott Scott.Bertschi@clydeco.us, maria.clark@aon.com, Bodden Tara Tara.Bodden@HISCOX.com

Dear Mr. Elliott:

Please see the attached correspondence from Scott Bertschi in the above-referenced matter.

Should you have any questions or concerns, please do not hesitate to contact us.

Thank you,

Victoria Cope
Legal Administrative Assistant | Clyde & Co US LLP
Direct Dial: +1 404 410 3160 | **Mobile:** +1 404 374 5461

CLYDE&CO

271 17th Street | Suite 1720 | Atlanta | GA 30363 | USA
Main +1 404 410 3150 | **Fax** +1 404 410 3151 | www.clydeco.us

This email message and any attachments may contain legally privileged and/or confidential information intended solely for the use of the individual or entity to whom it is addressed. If the reader of this message is not the intended recipient, you are hereby notified that any reading, dissemination, distribution or copying of this message or its attachments is strictly prohibited. If you have received this email message in error, please immediately notify us by telephone, fax or email and delete the message and all attachments thereto. Thank you. Clyde & Co US LLP is a Delaware limited liability law partnership affiliated with Clyde & Co LLP, a multinational partnership regulated by The Law Society of England and Wales.

Disclosure: To ensure compliance with requirements imposed by the IRS in Circular 230, we inform you that any tax advice contained in this communication (including any attachment that does not explicitly state otherwise) is not intended or written to be used, and cannot be used, for the purpose of avoiding penalties under the Internal Revenue Code or promoting, marketing or recommending to another party any transaction or matter addressed herein.



Hiscox_Amazing
Grace...7).PDF

From: Todd Musburger todd@musburger.com
Subject: Fwd: Amazing Grace, LLC E&O #USUUA2700815.15
Date: June 11, 2018 at 8:03 AM
To: Alan Elliott Alan@alanelliott.net



They're always there when it's premium time!

Todd W. Musburger
Todd W. Musburger, Ltd.
3033 Simpson Street
Evanston, Illinois 60201
312 961 6422
312 664 2600

----- Forwarded message -----

From: Ramona Horne <ramona.horne@aon.com>
Date: Mon, Jun 11, 2018 at 9:06 AM
Subject: RE: Amazing Grace, LLC E&O #USUUA2700815.15
To: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Cc: "Todd W. Musburger" <todd@musburger.com>

Good morning,

Following up. Please advise how we should proceed.

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

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

From: Ramona Horne
Sent: Monday, May 14, 2018 12:23 PM
To: 'alan elliott (ucla)'
Cc: Todd W. Musburger
Subject: Amazing Grace, LLC E&O #USUUA2700815.15
Importance: High

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

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Re: Amazing Grace- PLEASE CHECK THIS
Date: July 6, 2015 at 8:05 PM
To: Todd Musburger todd@musburger.com



BEFORE I SEND TO INSURANCE... PLS 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 for the following to be spelled out:

- a definitive statement from the insurance company that they are insuring you, and those you deal with, from all claims regarding the chain of title to the film.
 - that there are any 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.)
- what we need is to use the policy as evidence that the Warner quit claim insulates me and my assignees.
 - that the indemnification letter in the warner contract from Atlantic is in effect (OR WHAT IS THE LANGUAGE).

thank you.

-alan

phone: 323 988 9692

This email 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.

On Mar 4, 2015, at 12:25 PM, Stephen Carroll <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



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.

On Feb 27, 2015, at 1:42 PM, Stephen Carroll <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
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> 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
Cell: 914-589-2474
Fax: 847-953-2692

<Amazing Grace Hiscox Quote.PDF>

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Fwd: Amazing Grace- PLEASE CHECK THIS
Date: July 8, 2015 at 1:37 PM
To: Stephen Carroll stephen.carroll@aon.com, Annette Shavuo annette.shavuo@aon.com



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)

This email 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.

On Mar 4, 2015, at 12:25 PM, Stephen Carroll <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.

On Feb 27, 2015, at 1:42 PM, Stephen Carroll <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> 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: Annette Shavuo 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, Stephen Carroll 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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

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)

This email 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.

On Mar 4, 2015, at 12:25 PM, Stephen Carroll
<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.

On Feb 27, 2015, at 1:42 PM, Stephen Carroll
<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>
wrote:

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

initially 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

[371 KB](#)

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Fwd: Amazing Grace- PLEASE CHECK THIS
Date: July 9, 2015 at 8:04 AM
To: Todd W. Musburger todd@musburger.com



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.

Begin forwarded message:

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

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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

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)

This email 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.

On Mar 4, 2015, at 12:25 PM, Stephen Carroll
<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: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

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.

On Feb 27, 2015, at 1:42 PM, Stephen Carroll
<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> 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>



Propos...O.PDF

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Re: Amazing Grace- PLEASE CHECK THIS
Date: July 9, 2015 at 9:24 AM
To: Todd Musburger todd@musburger.com



let's see what insurance comes back with...

telluride doesn't announce its schedule until the Friday of the festival (which starts Saturday)...

so I'm not too worried... hard to find a judge on a Saturday... or Sunday...

and until they announce... hard to serve, right?

telluride has full knowledge of all malarkey... ALL of it.

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.

On Jul 9, 2015, at 9:13 AM, Todd Musburger <todd@musburger.com> wrote:

Two things:

Do you have anything in writing from Telluride about what you are providing and what their understanding is of the dispute with Aretha? I am not as optimistic as you about her not suing..I am concerned that once there is an announcement that the film is scheduled, that there will be action of one sort or another from her. Telluride needs to be warned and you have to make sure that you have not hidden anything from them nor made any misrepresentations. This also goes to the funds that Peter Benoe has provided.

The response from the insurance company is less than a full loaf. They still make reference to the important endorsement, yet they do not indicate that they have cleared it. I think the question still remains and I am not certain that they have given any indication that they are accepting your theory or the Atlantic indemnification document. We need to have a solid conversation with them in which they answer the question directly.

Todd W. Musburger
Todd W. Musburger, Ltd.
142 E. Ontario
Suite 500
Chicago, Illinois 60611
312 664 2600

On Thu, Jul 9, 2015 at 10:04 AM, alan elliott (ucla) <alanelliott@g.ucla.edu> wrote:

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.

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>

Date: July 9, 2015 at 7:56:00 AM PDT
To: alan elliott <alanelliott@g.ucla.edu>, Stephen Carroll <stephen.carroll@aon.com>
Subject: RE: Amazing Grace- PLEASE CHECK THIS

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](tel:(212)627-7400) / Direct: [\(212\) 463-5586](tel:(212)463-5586)
Fax: [\(212\) 633-1457](tel:(212)633-1457) / Direct: [\(847\) 953-0849](tel:(847)953-0849)

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

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)

This email 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.

On Mar 4, 2015, at 12:25 PM, Stephen Carroll <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: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.

On Feb 27, 2015, at 1:42 PM, Stephen Carroll <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

please see answers below.

On Feb 27, 2015, at 11:22 AM, Stephen Carroll
<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: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Re: Amazing Grace- PLEASE CHECK THIS
Date: July 9, 2015 at 2:04 PM
To: Annette Shavuo annette.shavuo@aon.com
Cc: Stephen Carroll stephen.carroll@aon.com



hi annette and stephen

i was about to sign this and noticed it is not the correct version.

can i please get the revised quote with this taken out of the doc. now that question #22 has been answered:

SUBJECTIVITIES:

To remove endorsement 2542 - Failure to Obtain License Exclusion

Need update on Question # 22 that all final selections have been made and all rights and releases obtained.

thank you.

-alan

phone: 323 988 9692

This email 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.

On Jul 9, 2015, at 7:56 AM, Annette Shavuo <annette.shavuo@aon.com> wrote:

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

Before you print, think about the ENVIRONMENT 🌱

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

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)

This email 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.

On Mar 4, 2015, at 12:25 PM, Stephen Carroll
<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

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.

On Feb 27, 2015, at 1:42 PM, Stephen Carroll
<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

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> 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

Fax: 847-953-2692

<Amazing Grace Hiscox Quote.PDF>

<T&D Insurance Proposal -Amazing Grace - E&O.PDF>

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Re: Amazing Grace- PLEASE CHECK THIS
Date: July 9, 2015 at 2:05 PM
To: Annette Shavuo annette.shavuo@aon.com
Cc: Stephen Carroll stephen.carroll@aon.com



and... one thing more:

how much is a title report?

thank you.

-alan

phone: 323 988 9692

This email 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.

On Jul 9, 2015, at 7:56 AM, Annette Shavuo <annette.shavuo@aon.com> wrote:

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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

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)

This email 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.

On Mar 4, 2015, at 12:25 PM, Stephen Carroll
<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)
F: [212 250 0000](tel:2122500000)

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

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.

On Feb 27, 2015, at 1:42 PM, Stephen Carroll
<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> 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
Cell: 914-589-2474
Fax: 847-953-2692

<Amazing Grace Hiscox Quote.PDF>

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Fwd: Amazing Grace- PLEASE CHECK THIS
Date: July 9, 2015 at 2:06 PM
To: Todd W. Musburger todd@musburger.com



thank you.

-alan

phone: 323 988 9692

This email 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.

Begin forwarded message:

From: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Subject: Re: Amazing Grace- PLEASE CHECK THIS
Date: July 9, 2015 at 2:04:39 PM PDT
To: Annette Shavuo <annette.shavuo@aon.com>
Cc: Stephen Carroll <stephen.carroll@aon.com>

hi annette and stephen

i was about to sign this and noticed it is not the correct version.

can i please get the revised quote with this taken out of the doc. now that question #22 has been answered:

SUBJECTIVITIES:

To remove endorsement 2542 - Failure to Obtain License Exclusion

Need update on Question # 22 that all final selections have been made and all rights and releases obtained.

thank you.

-alan

phone: 323 988 9692

This email 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.

On Jul 9, 2015, at 7:56 AM, Annette Shavuo <annette.shavuo@aon.com> wrote:

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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

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

This email 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.

On Mar 4, 2015, at 12:25 PM, Stephen Carroll
<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

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

original submission without making copies, abstracting, 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.

On Feb 27, 2015, at 1:42 PM, Stephen Carroll
<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> 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
Cell: 914-589-2474
Fax: 847-953-2692

<Amazing Grace Hiscox Quote.PDF>

<T&D Insurance Proposal -Amazing Grace - E&O.PDF>

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Re: Amazing Grace- PLEASE CHECK THIS
Date: July 9, 2015 at 3:24 PM
To: Tom McGuire TMcGuire@wmeentertainment.com
Cc: Todd W. Musburger todd@musburger.com, Liesl Copland LCopland@wmeentertainment.com



yes

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.

On Jul 9, 2015, at 3:18 PM, Tom McGuire <TMcGuire@wmeentertainment.com> wrote:

What was your answer to Question 22

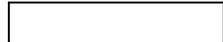
Tom McGuire | WME
TMcGuire@wmeentertainment.com
310.248.3022

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Thursday, July 09, 2015 12:26 PM
To: Tom McGuire; Todd W. Musburger; Liesl Copland
Subject: Fwd: Amazing Grace- PLEASE CHECK THIS

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.

Begin forwarded message:

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

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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

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 ioanne i would like to bind coverage as an

per my conversation with Joanne, I would like to find 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)

This email 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@alaneliott.net.

On Mar 4, 2015, at 12:25 PM, Stephen Carroll
<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.

On Feb 27, 2015, at 1:42 PM, Stephen Carroll <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
m> 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

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>)
Δ)

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
Cell: 914-589-2474
Fax: 847-953-2692

<Amazing Grace Hiscox Quote.PDF>

From: Todd Musburger todd@musburger.com
Subject: Re: Amazing Grace- PLEASE CHECK THIS
Date: July 9, 2015 at 5:16 PM
To: alan elliott (ucla) alanelliott@g.ucla.edu
Cc: Tom McGuire TMcGuire@wmeentertainment.com, Liesl Copland LCopland@wmeentertainment.com



Oy! This is the heart of the policy...accuracy is paramount...I'm a bit flabbergasted that the insurance company lawyer hasn't requested complete details on this?

Todd W. Musburger
Todd W. Musburger, Ltd.
142 E. Ontario
Suite 500
Chicago, Illinois 60611
312 664 2600

On Thu, Jul 9, 2015 at 7:13 PM, alan elliott (ucla) <alanelliott@g.ucla.edu> wrote:
"will any film clips, TV clips, or photographs be used in this production?"

i thought it meant OTHER film clips (didn't realize it was MY film clips that were being referred to!)... and i mis answered a question... should have checked the "yes" box...

i have now checked the "yes" box.

awaiting the redraft...

thank you.

-alan

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

This email 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.

On Jul 9, 2015, at 4:59 PM, Tom McGuire <TMcGuire@wmeentertainment.com> wrote:

I don't understand. What was the content of question 22

Tom McGuire | WME
TMcGuire@wmeentertainment.com
[310.248.3022](tel:3102483022)

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Thursday, July 09, 2015 3:25 PM
To: Tom McGuire
Cc: Todd W. Musburger; Liesl Copland
Subject: Re: Amazing Grace- PLEASE CHECK THIS

yes

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.

On Jul 9, 2015, at 3:18 PM, Tom McGuire <TMcGuire@wmeentertainment.com> wrote:

What was your answer to Question 22

Tom McGuire | WME
TMcGuire@wmeentertainment.com
[310.248.3022](tel:310.248.3022)

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Thursday, July 09, 2015 12:26 PM
To: Tom McGuire; Todd W. Musburger; Liesl Copland
Subject: Fwd: Amazing Grace- PLEASE CHECK THIS

thank you.

phone: [323 988 9692](tel: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.

Begin forwarded message:

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

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](tel:(212)627-7400) / Direct: [\(212\) 463-5586](tel:(212)463-5586)
Fax: [\(212\) 633-1457](tel:(212)633-1457) / Direct: [\(847\) 953-0849](tel:(847)953-0849)

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

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 elements

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

This email 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.

On Mar 4, 2015, at 12:25 PM,
Stephen Carroll
<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

ney 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.

On Feb 27, 2015, at 1:42 PM, Stephen Carroll <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>
u]
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>
> 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
docu
menta
ry,
music
video
or
somet
hing
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
Cell: 914-589-2474
Fax: 847-953-2692

<Amazing Grace Hiscox Quote.PDF>

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Re: Amazing Grace- PLEASE CHECK THIS
Date: July 9, 2015 at 5:26 PM
To: Todd Musburger todd@musburger.com
Cc: Tom McGuire TMcGuire@wmeentertainment.com, Liesl Copland LCopland@wmeentertainment.com



yea... I messed up. look... they are not all in heat about it.
it's obvious I misanswered... the film is all film clips of mine!
what they have done is:
- vet the timeline and contracts
full stop and well done!
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.

On Jul 9, 2015, at 5:16 PM, Todd Musburger <todd@musburger.com> wrote:

Oy! This is the heart of the policy...accuracy is paramount...I'm a bit flabbergasted that the insurance company lawyer hasn't requested complete details on this?

Todd W. Musburger
Todd W. Musburger, Ltd.
142 E. Ontario
Suite 500
Chicago, Illinois 60611
312 664 2600

On Thu, Jul 9, 2015 at 7:13 PM, alan elliott (ucla) <alanelliott@g.ucla.edu> wrote:
"will any film clips, TV clips, or photographs be used in this production?"

i thought it meant OTHER film clips (didn't realize it was MY film clips that were being referred to!)... and i mis answered a question... should have checked the "yes" box...

i have now checked the "yes" box.

awaiting the redraft...

thank you.

-alan

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

This email 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.

On Jul 9, 2015, at 4:59 PM, Tom McGuire <TMcGuire@wmeentertainment.com> wrote:

I don't understand. What was the content of question 22

Tom McGuire | WME
TMcGuire@wmeentertainment.com
[310.248.3022](tel:3102483022)

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Thursday, July 09, 2015 3:25 PM
To: Tom McGuire
Cc: Todd W. Musburger; Liesl Copland
Subject: Re: Amazing Grace- PLEASE CHECK THIS

yes

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.

On Jul 9, 2015, at 3:18 PM, Tom McGuire <TMcGuire@wmeentertainment.com> wrote:

What was your answer to Question 22

Tom McGuire | WME
TMcGuire@wmeentertainment.com
[310.248.3022](tel:3102483022)

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Thursday, July 09, 2015 12:26 PM
To: Tom McGuire; Todd W. Musburger; Liesl Copland
Subject: Fwd: Amazing Grace- PLEASE CHECK THIS

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.

Begin forwarded message:

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

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](tel:(212)627-7400) / Direct: [\(212\) 463-5586](tel:(212)463-5586)
Fax: [\(212\) 633-1457](tel:(212)633-1457) / Direct: [\(847\) 953-0849](tel:(847)953-0849)

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

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)

This email 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.

On Mar 4, 2015, at 12:25 PM,
Stephen Carroll
<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: [914 580 2171](tel:9145802171)

Cell: ~~914-389-2474~~
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](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.

On Feb 27, 2015, at 1:42 PM, Stephen Carroll <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>
u]

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>
> 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) the atlantic 25th anniversary film

2) aretha franklin; the
queen of soul (august 22,
1988)
([http://www.imdb.com/tit
le/tt0210537/](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. Di
d they
obtain
rights
from
Warn
er
Broth
ers?

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
Cell: 914-589-2474
Fax: 847-953-2692

<Amazing Grace Hiscox Quote.PDF>

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Fwd: Amazing Grace- PLEASE CHECK THIS
Date: July 10, 2015 at 9:33 AM
To: Stephen Carroll Stephen.carroll@aon.com



thank you.

-alan

phone: 323 988 9692

This email 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.

Begin forwarded message:

From: Annette Shavuo <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>, Stephen Carroll <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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

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)

This email 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.

On Mar 4, 2015, at 12:25 PM, Stephen Carroll
<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: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

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.

On Feb 27, 2015, at 1:42 PM, Stephen Carroll
<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

Sent: Friday, February 27, 2015 8:00 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> 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
Cell: 914-589-2474
Fax: 847-953-2692

<Amazing Grace Hiscox Quote.PDF>



T&D Insurance
Propos...O.PDF

From: Stephen Carroll 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
Cc: Annette Shavuo 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

This email 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.

Begin forwarded message:

From: Annette Shavuo <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>, Stephen Carroll <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 name and address of 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

Before you print, think about the ENVIRONMENT 🌳

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

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)

This email 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.

On Mar 4, 2015, at 12:25 PM, Stephen Carroll
<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.

On Feb 27, 2015, at 1:42 PM, Stephen Carroll <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> 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: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Fwd: Amazing Grace- PLEASE CHECK THIS
Date: July 10, 2015 at 12:11 PM
To: Todd W. Musburger todd@musburger.com



you good?

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.

Begin forwarded message:

From: Stephen Carroll <stephen.carroll@aon.com>
Date: July 10, 2015 at 11:54:02 AM PDT
To: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Cc: Annette Shavuo <annette.shavuo@aon.com>
Subject: RE: Amazing Grace- PLEASE CHECK THIS

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

This email 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.

Begin forwarded message:

From: Annette Shavuo <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>, Stephen Carroll <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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

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)

This email 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.

On Mar 4, 2015, at 12:25 PM, Stephen Carroll
<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.

On Feb 27, 2015, at 1:42 PM, Stephen Carroll
<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> 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
Cell: 914-589-2474
Fax: 847-953-2692

<Amazing Grace Hiscox Quote.PDF>

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Fwd: amazing grace policy.
Date: July 22, 2015 at 8:47 AM
To: Todd W. Musburger todd@musburger.com



thank you.

-alan

phone: 323 988 9692

This email 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.

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Subject: RE: amazing grace policy.
Date: July 22, 2015 at 7:23:08 AM PDT
To: "alan elliott (ucla)" <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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

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.

From: Stephen Carroll 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
Cc: Annette Shavuo annette.shavuo@aon.com, Todd W. Musburger 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> 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

This email 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.

On Aug 31, 2015, at 9:26 AM, Stephen Carroll
<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

This email 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.

Begin forwarded message:

Begin forwarded message:

From: alan elliott (ucla) <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>, "Todd W. Musburger" <todd@musburger.com>
Cc: Liesl Copland <LCopland@wmeentertainment.com>, "Todd W. Musburger" <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

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. No one else is authorised to distribute, forward, print, copy or act upon any information contained in this email. If you have received this email in error, please notify the sender.

Hiscox Syndicates Ltd and Hiscox Insurance Company Ltd are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority. Hiscox Underwriting Limited, Hiscox Europe Underwriting Limited and Hiscox ASM Limited are authorised and regulated by the Financial Conduct Authority. Hiscox plc is a company registered in England and Wales under company registration number 2837811 and registered office at 1 Great St Helen's, London EC3A 6HX.

<Invoice #1444.pdf>



Amazing Grace
- Frank...C.PDF

50 KB

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Fwd: amazing grace policy 2700815 NEED ASAP
Date: May 4, 2017 at 9:03 AM
To: Lew Loss lloss@ljwllp.com
Cc: Charles Chotvacs cchotvacs@ljwllp.com



in going over correspondence, i found this and wanted to forward. i am almost done with your questions- just trying to find signed hiscox policy.
thank you.

-alan

phone: 323 988 9692

peace and love.

Begin forwarded message:

From: Stephen Carroll <stephen.carroll@aon.com>
Subject: RE: amazing grace policy 2700815 NEED ASAP
Date: January 27, 2016 at 1:08:32 PM PST
To: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Cc: Annette Shavuo <annette.shavuo@aon.com>, "Todd W. Musburger" <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> 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

This email 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.

On Aug 31, 2015, at 9:26 AM, Stephen Carroll
<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

This email 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.

Begin forwarded message:

From: alan elliott (ucla) <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>, "Todd W. Musburger" <todd@musburger.com>

Cc: Liesl Copland <LCopland@wmeentertainment.com>, "Todd W. Musburger" <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

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. No one else is authorised to distribute, forward, print, copy or act upon any information contained in this email. If you have received this email in error, please notify the sender.

Hiscox Syndicates Ltd and Hiscox Insurance Company Ltd are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority. Hiscox Underwriting Limited, Hiscox Europe Underwriting Limited and Hiscox ASM Limited are authorised and regulated by the Financial Conduct Authority. Hiscox plc is a company registered in England and Wales under company registration number 2837811 and registered office at 1 Great St Helen's, London EC3A 6HX.

<[Invoice #1444.pdf](#)>



Amazing Grace
- Frank...C.PDF

From: Stephen Carroll 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, Annette Shavuo annette.shavuo@aon.com
Cc: Liesl Copland LCopland@wmeentertainment.com, Todd Musburger 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

This email 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.

Begin forwarded message:

From: alan elliott (ucla) <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>, "Todd W. Musburger" <todd@musburger.com>
C: Liesl Copland <LCopland@wmeentertainment.com>, "Todd W. Musburger"

CC: LIESI COPLAND <LCopland@wmeentertainment.com>, TODD W. MUSBURGER
<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: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Re: amazing grace policy 2700815 NEED ASAP
Date: August 31, 2015 at 9:36 AM
To: Stephen Carroll stephen.carroll@aon.com
Cc: Annette Shavuo annette.shavuo@aon.com, Liesl Copland LCopland@wmeentertainment.com, Todd W. Musburger todd@musburger.com



here you go:



thank you.

-alan

phone: 323 988 9692

This email 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.

On Aug 31, 2015, at 9:26 AM, Stephen Carroll <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

This email 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.

Begin forwarded message:

From: alan elliott (ucla) <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>, "Todd W. Musburger"
<todd@musburger.com>

Cc: Liesl Copland <LCopland@wmeentertainment.com>, "Todd W. Musburger"
<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: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Fwd: amazing grace policy 2700815 NEED ASAP
Date: August 31, 2015 at 10:07 AM
To: Todd Musburger todd@musburger.com, Liesl Copland LCopland@wmeentertainment.com



thank you.

-alan

phone: 323 988 9692

This email 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.

Begin forwarded message:

From: Stephen Carroll <stephen.carroll@aon.com>
Subject: FW: amazing grace policy 2700815 NEED ASAP
Date: August 31, 2015 at 10:07:13 AM PDT
To: "alan elliott (ucla)" (alanelliott@g.ucla.edu) <alanelliott@g.ucla.edu>
Cc: Annette Shavuo <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

NEW YORK, NY 10010

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

This email 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.

On Aug 31, 2015, at 9:26 AM, Stephen Carroll <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

This email 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.

Begin forwarded message:

From: alan elliott (ucla) <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>, "Todd W. Musburger" <todd@musburger.com>

Cc: Liesl Copland <LCopland@wmeentertainment.com>, "Todd W. Musburger" <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

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. No one else is authorised to distribute, forward, print, copy or act upon any information contained in this email. If you have received this email in error, please notify the sender.

Hiscox Syndicates Ltd and Hiscox Insurance Company Ltd are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority. Hiscox Underwriting Limited, Hiscox Europe Underwriting Limited and Hiscox ASM Limited are authorised and regulated by the Financial Conduct Authority. Hiscox plc is a company registered in England and Wales under company registration number 2837811 and registered office at 1 Great St Helen's, London EC3A 6HX.



Invoice
#1444.pdf

{ 61 KB }

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Re: amazing grace policy 2700815 NEED ASAP
Date: August 31, 2015 at 10:08 AM
To: Stephen Carroll stephen.carroll@aon.com
Cc: Annette Shavuo annette.shavuo@aon.com, Liesl Copland LCopland@wmeentertainment.com, Todd W. Musburger todd@musburger.com



thank you.

-alan

phone: 323 988 9692

This email 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.

On Aug 31, 2015, at 9:26 AM, Stephen Carroll <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

This email 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.

Begin forwarded message:

From: alan elliott (ucla) <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>, "Todd W. Musburger" <todd@musburger.com>

Cc: Liesl Copland <LCopland@wmeentertainment.com>, "Todd W. Musburger" <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: Todd Musburger todd@musburger.com
Subject: Re: amazing grace policy 2700815 NEED ASAP
Date: August 31, 2015 at 10:15 AM
To: alan elliott (ucla) alanelliott@g.ucla.edu
Cc: Liesl Copland LCopland@wmeentertainment.com

TM

Stay on him to get the new endorsement page...email chain is not good enough...

Todd W. Musburger
Todd W. Musburger, Ltd.
142 E. Ontario
Suite 500
Chicago, Illinois 60611
312 664 2600

On Mon, Aug 31, 2015 at 12:07 PM, alan elliott (ucla) <alanelliott@g.ucla.edu> wrote:

thank you.

-alan

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

This email 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.

Begin forwarded message:

From: Stephen Carroll <stephen.carroll@aon.com>
Subject: FW: amazing grace policy 2700815 NEED ASAP
Date: August 31, 2015 at 10:07:13 AM PDT
To: "alan elliott (ucla) (alanelliott@g.ucla.edu)" <alanelliott@g.ucla.edu>
Cc: Annette Shavuo <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](tel:2123374353)
New Cell: [914-588-4290](tel:9145884290)
Fax: [847-953-2692](tel:8479532692)

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

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](tel:212-337-4353)
New Cell: [914-588-4290](tel:914-588-4290)
Fax: [847-953-2692](tel: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](tel:323-988-9692)

This email 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.

On Aug 31, 2015, at 9:26 AM, Stephen Carroll <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](tel:212-337-4353)
New Cell: [914-588-4290](tel:914-588-4290)

Fax: [847-953-2692](tel: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](tel:323-988-9692)

This email 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.

Begin forwarded message:

From: alan elliott (ucla) <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>, "Todd W. Musburger" <todd@musburger.com>

Cc: Liesl Copland <LCopland@wmeentertainment.com>, "Todd W. Musburger" <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

you have received this email in error, please notify the sender.

Hiscox Syndicates Ltd and Hiscox Insurance Company Ltd are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority. Hiscox Underwriting Limited, Hiscox Europe Underwriting Limited and Hiscox ASM Limited are authorised and regulated by the Financial Conduct Authority. Hiscox plc is a company registered in England and Wales under company registration number 2837811 and registered office at 1 Great St Helen's, London EC3A 6HX.

From: Liesl Copland LCopland@wmeentertainment.com
Subject: Re: amazing grace policy 2700815 NEED ASAP
Date: August 31, 2015 at 5:22 PM
To: Todd Musburger todd@musburger.com
Cc: alan elliott (ucla) alanelliott@g.ucla.edu



Pls- then send to Ali and Stacy w me on Cc

Sent from my iPhone

Liesl Copland | WME
LCopland@wmeentertainment.com
310.246.3383

On Aug 31, 2015, at 10:15 AM, Todd Musburger <todd@musburger.com> wrote:

Stay on him to get the new endorsement page...email chain is not good enough...

Todd W. Musburger
Todd W. Musburger, Ltd.
142 E. Ontario
Suite 500
Chicago, Illinois 60611
312 664 2600

On Mon, Aug 31, 2015 at 12:07 PM, alan elliott (ucla) <alanelliott@g.ucla.edu> wrote:

thank you.

-alan

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

This email 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.

Begin forwarded message:

From: Stephen Carroll <stephen.carroll@aon.com>
Subject: FW: amazing grace policy 2700815 NEED ASAP
Date: August 31, 2015 at 10:07:13 AM PDT
To: "alan elliott (ucla)" <alanelliott@g.ucla.edu> <alanelliott@g.ucla.edu>
Cc: Annette Shavuo <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](tel:2123374353)
New Cell: [914-588-4290](tel:9145884290)
Fax: [847-953-2692](tel:8479532692)

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](tel:212-337-4353)
New Cell: [914-588-4290](tel:914-588-4290)
Fax: [847-953-2692](tel: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](tel:323-988-9692)

This email 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.

On Aug 31, 2015, at 9:26 AM, Stephen Carroll
<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](tel:212-337-4353)
New Cell: [914-588-4290](tel:914-588-4290)
Fax: [847-953-2692](tel: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](tel:323-988-9692)

This email 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.

Begin forwarded message:

From: alan elliott (ucla) <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>, "Todd W. Musburger" <todd@musburger.com>
Cc: Liesl Copland <LCopland@wmeentertainment.com>, "Todd W. Musburger" <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

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. No one else is authorised to distribute, forward, print, copy or act upon any information contained in this email. If you have received this email in error, please notify the sender.

Hiscox Syndicates Ltd and Hiscox Insurance Company Ltd are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority. Hiscox Underwriting Limited, Hiscox Europe Underwriting Limited and Hiscox ASM Limited are authorised and regulated by the Financial Conduct Authority. Hiscox plc is a company registered in England and Wales under company registration number 2837811 and registered office at 1 Great St Helen's, London EC3A 6HX.

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Re: amazing grace policy 2700815 NEED ASAP
Date: January 27, 2016 at 9:49 AM
To: Stephen Carroll stephen.carroll@aon.com
Cc: Annette Shavuo annette.shavuo@aon.com, Todd W. Musburger todd@musburger.com



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> 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

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

This email 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.

On Aug 31, 2015, at 9:26 AM, Stephen Carroll <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

This email 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.

Begin forwarded message:

From: alan elliott (ucla) <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>, "Todd W. Musburger" <todd@musburger.com>
Cc: Liesl Copland <LCopland@wmeentertainment.com>, "Todd W. Musburger" <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

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. No one else is authorised to distribute, forward, print, copy or act upon any information contained in this email. If you have received this email in error, please notify the sender.

Hiscox Syndicates Ltd and Hiscox Insurance Company Ltd are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority. Hiscox Underwriting Limited, Hiscox Europe Underwriting Limited and Hiscox ASM Limited are authorised and regulated by the Financial Conduct Authority. Hiscox plc is a company registered in England and Wales under company registration number 2837811 and registered office at 1 Great St Helen's, London EC3A 6HX.

<Invoice #1444.pdf>

From: Stephen Carroll 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, Annette Shavuo annette.shavuo@aon.com
Cc: Liesl Copland LCopland@wmeentertainment.com, Todd Musburger 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

phone: 323 988 9692

This email 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.

Begin forwarded message:

From: alan elliott (ucla) <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>, "Todd W. Musburger" <todd@musburger.com>
Cc: Liesl Copland <LCopland@wmeentertainment.com>, "Todd W. Musburger" <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: Todd Musburger todd@musburger.com
Subject: Re: amazing grace policy.
Date: July 22, 2015 at 9:14 AM
To: alan elliott (ucla) alanelliott@g.ucla.edu



Alan, when the policy arrives, Harmoni has asked that a copy be sent to her as well...she will circulate with Amazon legal team...Also, they have asked for any internal docs from insurance company lawyers laying out their analysis, if such a thing exists...

Todd W. Musburger
Todd W. Musburger, Ltd.
142 E. Ontario
Suite 500
Chicago, Illinois 60611
312 664 2600

On Wed, Jul 22, 2015 at 10:47 AM, alan elliott (ucla) <alanelliott@g.ucla.edu> wrote:

thank you.

-alan

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

This email 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.

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Subject: RE: amazing grace policy.
Date: July 22, 2015 at 7:23:08 AM PDT
To: "alan elliott (ucla)" <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](tel:(212)627-7400) / Direct: [\(212\) 463-5586](tel:(212)463-5586)
Fax: [\(212\) 633-1457](tel:(212)633-1457) / Direct: [\(847\) 953-0849](tel:(847)953-0849)

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message

is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

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](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.

From: Annette Shavuo 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



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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

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

strictly prohibited), and so please use sender by reply info@alapheta.net.

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Amazing Grace
Date: July 25, 2017 at 12:47 PM
To: seth lichtenstein sl@hlymedialaw.com



since you asked... and... thank you again for your time and consideration.

below is the most recent back and forths re: insurance and below that is the timeline and the virtual dossier can be found here:

<http://alsrecordsandtapes.com/amazinglaw/wbdocs/>

the letter from the attorney in denver to aretha (which has not been sent- and will not be sent until insurance is straight) is here:



Elliott-Franklin -
ltr to N...).docx

thank you-

alan

here is hiscox turning down of coverage:



Amazing Grace
- Frank...OC.pdf

this was follow letter sent to my insurance broker laura comerford, who forwarded to hiscox:

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 this discussion, we specifically reviewed the 2011 lawsuit and the 2013 contract with both Hiscox (Ted Gerdes) and AON when considering how to answer the question. The answer was discussed and deliberated with Hiscox through Joanne Richardson, with Hiscox's counsel Ted Gerdes and with AON's Stephen Carroll and Annette Shavuo.

Because of the 2013 discover of the personal service contract, AON/Hiscox vetted the contract and when the question came up- EVERYONE was aware of the prior issues and that they were satisfied that solidity of the personal service contract and that 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.

Hiscox directed me to discuss these matters with Ted Gerdes, I specifically told Mr. Gerdes about the 2011 lawsuit, provided him with links in emails to the lawsuit and this lawsuit was THE SINGULAR FUNDAMENTAL upon which every conversation with Hiscox was based. Insurance would allow me to defend and enforce Ms. Franklin's contract which was recently discovered (in 2013) by Warner Films.

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. In fact, the pdf of the "cease and desist" settlement that resulted from the 2011 lawsuit was provided to all parties as part of the application and is included in multiple emails.

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 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.

Most importantly though, 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.

--

this is the letter stating further declination from hiscox:



Hiscox_Amazing
Grace...7).PDF

at the heart of declination is this:

the question which i SPECIFICALLY went over (post having the contract) with ted gerdes (counsel for hiscox) is #27:

"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?"

YES, in the past, aretha franklin could say that there was no contract- which is her counsel's basis- that there is no contract... however, we (hiscox and i) carefully agreed (and they were shown all docs i had) that the 1968 contract is what we relied upon.

ted gerdes and i CAREFULLY discussed this as- POST CONTRACT- the answer should on the application would be "NO"- which is what i filled out.

hiscox' joanne richardson wrote:

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
Connect with Hiscox online
Web www.hiscoxbroker.com
Twitter [@Hiscox_USA](https://twitter.com/Hiscox_USA)



amazing grace
App- R...03.doc

below is my correspondence with ted gerdes:

Begin forwarded message:

From: "alan elliott (ucla)" <alaneliott@g.ucla.edu>
Subject: Re: Amazing Grace
Date: June 5, 2015 at 3:33:24 PM PDT
To: Ted Gerdes <ted@gerdeslaw.com>

hi ted

answers below:

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.

On Jun 5, 2015, at 2:55 PM, Ted Gerdes <ted@gerdeslaw.com> wrote:

Alan:

I watched some of the film which was helpful to put this in perspective. It is a classic. Thanks for all of the documents and links. I have a couple of questions.

1. The Amendment to your Quitclaim Agreement requires delivery of the edited version of the film to WB by 12-31-12. Was that done and did they accept it?

yes.

If not you need another amendment as the rights have reverted back to WB.

2. There is discussion in some of the memos that the Choir may be due SAG fees for the film. What is the status of that? Are you paying them?

I have had the surviving members to screenings and plan on paying them on accordance with sag/AFTRA when I get funded.

Has there been some type of waiver?

sag/AFTRA said we could deal with it a when the time comes (they were very nice and understood the situation).

Regards,

Ted

PRIVILEGED AND CONFIDENTIAL INFORMATION: This e-mail and any attachments may contain information that is legally privileged and confidential. The information is only intended for the recipient(s) named above. If you have received this e-mail in error, please notify the sender and delete all copies without reading, printing, or saving in any manner. Any review, reliance, distribution, disclosure, or forwarding without express permission is strictly prohibited.

On Jun 4, 2015, at 6:09 PM, alan elliott (ucla) <alanelliott@g.ucla.edu> wrote:

hi ted

after we spoke, i went to your site... ! zen and the art of law/songwriting... well... we can have a good conversation about that someday soon i hope (my songwriting class has it's... zen principals...)

below are the specifics from your questions.

thank you.

-alan

phone: 323 988 9692

This email 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.

On Jun 4, 2015, at 2:12 PM, Ted Gerdes <ted@gerdeslaw.com> wrote:

Alan:

Great speaking to you. It sounds like finishing this film was a ton of work.

Please send me the following:

1. Links to the YouTube videos of the 1973 and 1986 use of the footage.

wb films AND Atlantic records separately used the footage that they could sync on two different occasions in DVDs they released.

("aretha franklin, queen of soul: american masters": available now at:

<http://www.tower.com/queen-soul-aretha-franklin-vhs/wapi/106077119>

"atlantic's 25th anniversary"[winner of a prize at the atlanta film festival in 1973!}).

<F819A5CE-6206-48F9-A115-F8736256F15E.tiff>

footage of the film is here:

<https://www.youtube.com/watch?v=8HUjEYh32Vc>

wb has all ready publicly displayed the usable parts they had (albeit in an abbreviated version as pollack et co. could only sync 153 mins of the 20+ hours of film).

2. The electronic document file received from WB with the releases, director's agreement etc.

the larger file is here:

<http://alsrecordsandtapes.com/amazinglaw/wbdocs/>

the releases for the choir and church are here:

<http://alsrecordsandtapes.com/amazinglaw/wbdocs/amazing%20releases%20church%20choir.pdf>

sydney pollack's is here:

<http://alsrecordsandtapes.com/amazinglaw/wbdocs/wb%20legal%20pollack%20payment.pdf>

3. A copy of the liner notes from the album referencing this film.

<IMG_7722.JPG>

4. A copy of Donaldson's letter.

<http://alsrecordsandtapes.com/amazinglaw/wbdocs/donaldson.aretha.letter002.pdf>

"ms. franklin has no viable copyright claim and no viable claim involving any of her personal rights such as the right to privacy, false light, defamation or the right of publicity." -michael donaldson

5. A link to the film.

here's the link for the film:

<https://vimeo.com/91847063>

password: sp

—
the trailer can be seen here:

<https://vimeo.com/75871364>

password: trailer

6. Anything else you think might be helpful.

a few things:

ALAN ELLIOTT/WB TIMELINE:

2007 quitclaim from wb in- asks for aretha permission

2011 amendment

2013- aretha's contract given to me by steve spira

https://www.law.cornell.edu/nyctap/I02_0118.htm

andrew bart, who successfully had the greenfield vs. spector:

greenfield vs. spector is, "controlling binding precedent in new york state and has been cited 100s of times as property law and absolute title across the country."

andy can be reached at:

"Andrew H. Bart" <abart@jenner.com>

i am NOT paying him... but if hiscox wishes to consult (and pay!)... he's there and ready!

i have a letter (which we can make an affidavit if necessary) from joe boyd.

<http://alsrecordsandtapes.com/amazinglaw/wbdocs/joe%20boyd%20letter.pdf>

joe's job was to get the releases for filming. he is also the highest ranking wb executive alive from when the film was shot- he was director of music services for wb films.

Wb in documents, refer to the album repeatedly as the "soundtrack album."

as discussed, the release for those entering the building (the general "notice: this recording session is being covered by motion picture cameras...")

<http://alsrecordsandtapes.com/amazinglaw/wbdocs/amazing%20releases%20church%20choir.pdf>

Ted

<image.jpg>

PRIVILEGED AND CONFIDENTIAL INFORMATION: This e-mail and any attachments may contain information that is legally privileged and confidential. The information is only intended for the recipient(s) named above. If you have received this e-mail in error, please notify the sender and delete all copies without reading, printing, or saving in any manner. Any review, reliance, distribution, disclosure, or forwarding without express permission is strictly prohibited.

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Subject: FW: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post
Date: July 22, 2015 at 12:32:48 PM PDT
To: "alanelliott@ucla.edu" <alanelliott@ucla.edu>
Cc: Stephen Carroll <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

Before you print, think about the ENVIRONMENT 🌱

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.



Binder - EO -
15-18...ce.pdf



App- REVISED
Q#22 -...03.doc

==

here is the timeline:

Amazing Grace:

Amazing Grace basic timeline:

In 1972, Warner films filmed "Amazing Grace"- a documentary film of the recording of the album of the same name. Warners hired Academy Award nominated director Sydney Pollack. The film was made with a film crew, a gospel choir and in a church. All members of the production signed releases/contracts. Ms. Franklin was under "personal service contract" with Warner films.

The release of the documentary was either to be a feature film or a television special and was intended and the film is made mention of inside the film and is included in the album's liner notes.

The movie was unable to be finished due to technical problems (syncing audio and video).

153 mins of the 20+hours of shooting were able to be put together.

Warner Films and Atlantic Records used the 153 minutes in at least two films:
"Atlantic Records 25th Anniversary" in 1973
"Aretha Frankl: Queen of Soul; American Masters" in 1986

Both films are produced by Warner films. "American Masters" was produced by Ms. Franklin and released jointly by Atlantic Records and Warner Films.

in 2007, Warner Films gave me quitclaim.

in 2010, new technology allowed for sync between the film with the audio.

Major points:

The film was made as a promotional film- common at the time. (Aretha made similar films which are currently available, including "Soul Sister," "Live at the Concertgebouw," "Live at the Filmore"- all made between 1968-1972 and covered by the existing contract.) (<http://teachrock.org/resources/video/embed/aretha-franklin-abc-news-closeup-1968/>) (<http://www.concertvault.com/aretha-franklin/fillmore-west-march-05-1971.html>) (<http://www.grooves-inc.com/franklin-aretha-live-1968-the-concertgebouw-amsterdam-rodeo-media-dvd-video-album-pZZa1-859540375.html>)

In 1972, Atlantic Records (record company) and Warner Severn Arts (film company) were under Warner Communications

Why the film was not released in 1972:

The pre-digital limitation to sync the film and audio caused Warners to shelve the project in 1972. Over time, and with the sale of the music company, and because of the rerelease of the assets over time, the physical assets were spread out between the film and film companies. Many assets either needed sorting or could not be found when resurrection of the project began in 2007.

Granular Timeline:

In 1967, Aretha Franklin signed a recording contract with Atlantic Records.

In 1968, Aretha Franklin was the biggest artist at Atlantic Records and renegotiated a more wide ranging "personal services contract" that triangulates Ms. Franklin, Warner Films and Atlantic Records. (<http://alsrecordsandtapes.com/amazinglaw/wbdocs/judy%20noack%201998%20amazing%20grace.pdf>)

In January, 1972, Sydney Pollack, a film crew, musicians, choir and locations were hired (with unique documentation) by Warner Films to make "Amazing Grace." (<http://alsrecordsandtapes.com/amazinglaw/wbdocs/amazing%20releases%20church%20choir.pdf>) (<http://alsrecordsandtapes.com/amazinglaw/wbdocs/wb%20legal%20pollack%20payment.pdf>) (<http://alsrecordsandtapes.com/amazinglaw/wbdocs/wb%20cinemobile%20rental.pdf>)

The co-star of the film, Reverend James Cleveland says during filming that "If you see all these cameras around, they are getting it together for Warner Brothers."

In August, 1972, the "Amazing Grace" LP was released by Atlantic Records. Ms. Franklin has approval over liner notes and art as per the 1968 Warner/Atlantic contract. The back of the album reads:

"Look for the film by Sydney Pollack." (<http://alsrecordsandtapes.com/amazinglaw/wbdocs/amazingliner.jpg>)

In 1972, Mr. Pollack could not finish the film as the audio and film could not be put together to make a film. ([http://alsrecordsandtapes.com/amazinglaw/wbdocs/wb%20memo%20for%20lip%20sync%20\\$.pdf](http://alsrecordsandtapes.com/amazinglaw/wbdocs/wb%20memo%20for%20lip%20sync%20$.pdf))

In September, 1972, due to technical difficulties, Warner Films "wrote off" the film. (<http://alsrecordsandtapes.com/amazinglaw/wbdocs/wb%20write%20off.pdf>)

Over the years, excerpts of the "Amazing Grace" film have been used; including but not limited to: "Atlantic 25: The History of Atlantic Records" in 1973 (<http://alsrecordsandtapes.com/amazinglaw/wbdocs/ATLANTAFILMFESTIVAL.tiff>); Aretha Franklin's American Masters: Aretha, the Queen of Soul in 1986 (produced by Ms. Franklin (<http://www.pbs.org/wnet/americanmasters/aretha-franklin-about-aretha-franklin/598/>)). All usages are done in reliance of the 1968 agreement between Ms. Franklin, Atlantic and Warners, with Atlantic Records and Warner Films (owners and distributors of the above two films). Clips from "Amazing Grace" are used across countless media since the original release of the footage in 1973 without any further documentation.

In 2003, Time Warner sold the Warner Music Group. (From 1967 until 2003, Warner Films and Atlantic Records were under the Time Warner umbrella.)

In 2007, I gained quitclaim of all assets, including all contracts and releases for "Amazing Grace" from Warner Films. Warner Films could not locate Ms. Franklin's personal service contract. In my quitclaim, Warners asked for permission from Ms. Franklin. (<http://alsrecordsandtapes.com/amazinglaw/wbdocs/A-7.%202007%20Quitclaim%20Agreement.pdf>)

The 2011 agreement Ms. Franklin sued Mr. Elliott. Because Ms. Franklin claimed there was no contract and because we could not get access to her contract, a private settlement was reached without court jurisdiction.

In 2013, Warner Films discovered and provided (as per quitclaim) Ms. Franklin's contract to Mr. Elliott, providing proof of Ms. Franklin's legal permission to make the film.

In 2013, Warner Films discovered Ms. Franklin's contract. Warner Films affirmed that the 1968 contract fulfilled Ms. Franklin's permission. ([http://alsrecordsandtapes.com/amazinglaw/wbdocs/4-1-1968%20Aretha%20Franklin%20Recording%20Agreement%20Atlantic%20and%20Warner%20Bros.%20Seven%20Arts\).pdf](http://alsrecordsandtapes.com/amazinglaw/wbdocs/4-1-1968%20Aretha%20Franklin%20Recording%20Agreement%20Atlantic%20and%20Warner%20Bros.%20Seven%20Arts).pdf))

After discovering the contract, Todd Musburger, attorney for Mr. Elliott, advised Arnold Reed, attorney for Ms. Franklin, that the 2011 settlement was no longer applicable as it could not be enforced due to the ongoing exploitation of the film assets by Warner Films and others (including Ms. Franklin). These film assets had, in fact, been exploited since 1972 by Warner Films, Atlantic Records and Ms. Franklin.

In April, 2015, Mr. Elliott advised Rick Levy, Ms. Franklin's agent, that Mr. Elliott would premiere the film at the Telluride Film Festival in September, 2015.

On August 20, 2015, Mr. Reed and Ms. Franklin's interview with the Detroit Free Press was published. In the article, Ms. Franklin said, "I love the film." Mr. Reed. (<http://www.freep.com/story/entertainment/music/brian-mccollum/2015/08/20/aretha-franklin-possible-injunction-amazing-grace-toronto/32078407/>) The article states, two weeks before the Telluride Film Festival and three weeks prior to the Toronto Film Festival that "The film is already one of the most buzzed-about documentaries on the Toronto docket."

On September 4, 2015, Ms. Franklin received a 14 day injunction from the tenth circuit.

Continuance stipulations were entered which specifies "good faith negotiations."

The film was purchase by Lionsgate Films following the Toronto Film Festival in September, 2015.

Negotiations:

Between 2007 and the present, Mr. Elliott and his representatives have tried to negotiate with seven or more lawyers over four different law firms, five different agents across two different agencies, many different publicists/managers/friends of Ms. Franklin.

Ms. Franklin asked for 50% of film and \$1m advance but is not sharing record royalties. The film (me) does not share in record receipts (estimated by wmg as \$3-5m over five years).

After 15 consecutive months post-Telluride, 2015, on December 30, 2016, Ms. Franklin turned down \$1.125m and 50% of Mr. Elliott's shares in the film.

Errors from the hearing:

1.
 - Q: "When did you become aware that this film would be shown at the Telluride Film Festival?"
 - A (Ms. Franklin): A few days ago. I read about it online.

Truth: Ms. Franklin gave an interview with the Detroit Free Press two weeks prior in which they discussed the film being shown at the film festival. The headline reads: **Aretha Franklin considers legal action to halt film**

Further: Mr. Elliott had a meeting with Ms. Franklin's representative Rick Levy Of ICM on April 22, 2015 where Mr. Elliott informed Mr. Levy of the Telluride and Toronto Film Festivals.

Mr. Elliott's lawyer Todd Musburger negotiated with Ms. Franklin's attorney Arnold Reed over the intervening time between the Elliott/Levy meeting.

Mr. Reed, when presented with Ms. Franklin's contract by Mr. Musburger, affirmed the contract.

2.

- A (Ms. Franklin): They didn't have my approval... he was going to use my name and likeness and use my name to reap financial benefits.
- Q: You mentioned your name and likeness. Is that important to you?
- A (Ms. Franklin): Oh, absolutely. For them to show that film and to... ignore me where my name and reputation, my concern, would be terrible."

Ms. Franklin, in the Detroit Free Press interview, said, "I love the film."

3.

- Q: Do you allow people to videotape your concerts?
- A (Ms. Franklin): No, not without my approval.

In the liner notes for Ms. Franklin's "Amazing Grace" album (notes she has approval over contractually), it reads: "The recording of this album was filmed by Warner Brothers, Inc. with Sidney Pollack directing."

- warners selling the record company and not having contract
- warners/atlantic withholding the contract

4.

- In Ms. Franklin's affidavit, she claims in 3. that "The recording of "Amazing Grace" was videotaped."

There was a 16mm film crew with five cameras and an Oscar nominated director, Sydney Pollack.

While videotape is similar for film, the planning to have Mr. Pollack's, his crew, the coordinating and cooperation of Warner Films and Atlantic Records, the audio crew, the location planning, the setting up of lights, the planning and execution of contracts and setting up of obstreperous equipment of the day (1972) was a big undertaking.

5.

- In Ms. Franklin's affidavit, she claims in 5. that she "never gave permission... to any entity granting permission to use my name and likeness for commercial purposes with regards to the "Amazing Grace" film, or any film footage or audio recording..."

The audio recording of "Amazing Grace" has been the best selling Gospel album of all time since it's release by Atlantic Records in 1972, amongst many untruths about this statement.

[http://alsrecordsandtapes.com/amazinglaw/wbdocs/\[10-1\]%20Affidavit%20of%20Aretha%20Franklin%20\(01499915xA6534\).pdf](http://alsrecordsandtapes.com/amazinglaw/wbdocs/[10-1]%20Affidavit%20of%20Aretha%20Franklin%20(01499915xA6534).pdf)

6.

- In Ms. Franklin's affidavit, she claims in 8. that "In August 2015, I discovered that Mr. Elliott plans to show the film at the Toronto Film Festival. Mr. Elliott gave me no notice of his intent to show the film at the Toronto Film Festival. I found out after seeing it on the internet."
- In Ms. Franklin's affidavit, she claims in 9. that "On September 3, 2015, I discovered that Alan Elliott plans to show the film at the Telluride Film Festival"
- In Ms. Franklin's affidavit, she claims in 10. that "No representatives of the Toronto Film Festival or the Telluride Film Festival have contacted me regarding their planned showing of the film."

Mr. Elliott had a meeting with Ms. Franklin's representative Rick Levy Of ICM on April 22, 2015 where Mr. Elliott informed Mr. Levy of the Telluride and Toronto Film Festivals.

Mr. Elliott's lawyer Todd Musburger negotiated with Ms. Franklin's attorney Arnold Reed continually over the intervening time between April 22, 2015 and the day Mr. Reed was fired days before the trial. Mr. Reed, when presented with Ms. Franklin's contract by Mr. Musburger, affirmed the contract.

Ms. Franklin, in a published interview with the Detroit Free Press two weeks prior to the Telluride Film Festival, the article reads: "'Amazing Grace," which captures a star-studded gospel service headlined by Franklin in 1972, is scheduled to premiere on opening night of September's prestigious Toronto International Film Festival."

Ms. Franklin's lawyers, including Arnold Reed and David Bennett were both informed months before the festivals and Mr. Reed negotiated. Mr. Reed discussed the pending festivals in an interview with the Detroit Free Press.

[http://alsrecordsandtapes.com/amazinglaw/wbdocs/\[10-1\]%20Affidavit%20of%20Aretha%20Franklin%20\(01499915xA6534\).pdf](http://alsrecordsandtapes.com/amazinglaw/wbdocs/[10-1]%20Affidavit%20of%20Aretha%20Franklin%20(01499915xA6534).pdf)

7.

- In Ms. Franklin's affidavit, she claims in 11., that "I believe that the right as to when my concert footage should be seen publicly, and under what conditions, is a right that belongs to me. I have never given that right with respect to the 1972 concert to anyone else."

Ms. Franklin's contract is specific.

"4. **All recording hereunder and all derivatives made therefrom, together with the performances embodied thereon, shall be entirely Company's property.**

Artist grants to Company ... (b) the right to use and publish, and to permit others to use and publish, the Artist's name and likeness...

This is the only contract which continues, since 1968, to be relied upon by Ms. Franklin, Atlantic Records and Warner Films.

Film of this specific concert has been used and licensed countless times by Ms. Franklin, Atlantic Records and Warner Films and continues to be displayed across all media as it has since 1973, including, but not limited to:

- commercial films
- documentary films
- television
- film clips
- YouTube

Aretha Franklin's personal service contract with Warner Films and Atlantic Records:

Warner Bros. and Atlantic Records continue to rely upon Ms. Franklin's personal service contract as they have for 49 years. The personal service contract covers all aspects of Ms. Franklin's "personal services" including film, tv, videos and recordings. This contract has been used to make LPs, Cds, Digital downloads, Videos, Cassettes, DVDs and whatever other coming reproductions. Ms. Franklin's personal service contract is what Warner Films, Atlantic Records and Ms. Franklin relied upon to make the film.

Ms. Franklin was always aware since the initial filming in 1972 of Warner Films' intent to make and distribute "Amazing Grace." She has never produced any documentation showing otherwise.

Ms. Franklin's contract is specific.

"4. **All recording hereunder and all derivatives made therefrom, together with the performances embodied thereon, shall be entirely Company's property.**

Artist grants to Company ... (b) the right to use and publish, and to permit others to use and publish, the Artist's name and likeness...

(c) the sole and exclusive rights in, title to and ownership, including, but not limited to, the right to use and control all masters, matrices, records or other reproductions of the performances embodied in such recordings by any method, electronic, magnetic, mechanical or other, now or hereafter know, obtained from recordings made here- under the performances embodied therein:

(d) the sole and exclusive right, if Company so desires, to to permit the public performances thereof, by means of radio broadcast or otherwise;"

Why the film was never released:

The reason the film was written off by Warner Brothers was because, due to technical difficulties, the film and music could not be put in sync. (document).

Telluride:

Ms. Franklin's contract, while hard to digest in an emergency session.

Atlantic Records refused Mr. Elliott access to Ms. Franklin's contract. Warner Films produced their copy of the personal service contract in 2013 after which Mr. Elliott, with the blessing of Warner Films, moved forward to finish the film for sale.

Plainly, there are releases for everyone in the production. The amount of information in terms of releases, contracts and planning are thorough and detailed. Every musician, choir member (even POTENTIAL choir members- those who could be possible replacements) are documented and accounted for with separate releases. Every 16 track tape, every 2 track tape, every piece of film was accounted for by, at the time, the largest film and music companies. Warners and Atlantic had a success a year prior with "Woodstock" and they were intent on duplicating a "synergy" between the film and music companies and had all ready used the blueprint (and would use it again and again).

Ms. Franklin presented to the court that she had no contract. However, after years of investigation, it is indisputable that Warner Films and Atlantic Records relied upon her personal services contract to make and distribute "Amazing Grace."

Fallout:

Ms. Franklin's offense rests on Warner Films mislabeling her contract when the company digitized it's paperwork from 40 years prior.

Ms. Franklin brought nuisance suits against Mr. Elliott, bullying him into agreements through threats, when in fact she had a contract which was being used the entire time and which she continues to collect on to this day.

Ms. Franklin took advantage of Mr. Elliott's lack of access to her contract.

- Detroit Free Press (<http://www.freep.com/story/entertainment/music/brian-mccollum/2015/08/20/aretha-franklin-possible-injunction-amazing-grace-toronto/32078407/>):

"Franklin's attorney cast doubt on the validity of the 1972 contract Elliott said he has since turned up.

'The Titanic will surface before this letter surfaces,' said Reed, adding that he has advised Elliott's attorney not to proceed with the Toronto screening. Such a contract would be irrelevant anyway, Reed said, because of the 2011 settlement agreement."

--

- every defense presented by Ms. Franklin has been done under false pretense:
 - she has a contract.
 - I would never have signed reed agreement if she had disclosed contract.
 - clearly every other thing is covered in ms franklin's contract. records, film, television.
 - wb either paid aretha the rate in the contract or considered it "promotional."
 - no responsibility to interpret what might have been negotiated- no proof there was any intended payment.
 - can't disentangle/carve out of this specific film- there is no other documents.
 - fillmore east is currently being sold.
 - abc documentary: 30 mins.: <http://teachrock.org/resources/video/embed/aretha-franklin-abc-news-closeup-1968/>
 - american masters: <http://www.pbs.org/wnet/americanmasters/aretha-franklin-about-aretha-franklin/598/>
 - bob rooyens film "live at concertgebouw" (<http://www.grooves-inc.com/franklin-aretha-live-1968-the-concertgebouw-amsterdam-rodeo-media-dvd-video-album-pZZa1-859540375.html>)(<http://www.jazzwax.com/2016/02/aretha-in-amsterdam-1968.html>) (http://www.openculture.com/2012/08/the_queen_of_soul_conquers_europe_aretha_franklin_in_amsterdam_1968.html)-12 songs... it's for sale now (<https://www.redbullet.nl/en/organisation/onset/>) (<http://www.northendhaarlem.nl/a-23574769/dvd-muziek/aretha-franklin-live-at-concertgebouw-1968-dvd/>)
 - 34 songs currently being "licensed" at reelin' in the years from the time under contract (http://reelintheyears.com/database-search/?stage=show_results)
 - wgbh licenses (<http://reelintheyears.com/wgbh-boston-and-reelin-in-the-years-productions-partner-to-license-music-footage/>)
- film from "Amazing Grace" is currently used- repeatedly. Countless. MTV, VH1, BET...
 - bet honors
 - kennedy center honors
 - photos are used from the filming.
 - album liner notes- she has approval: <http://alsrecordsandtapes.com/amazinglaw/wbdocs/amazingliner.jpg>
- no further documentation- only WB contract.
- The film was unreleased because of technical difficulties: film could not be synced with music (show memo)
- agreed with representative to a contract.
 - Lionsgate
 - Concord
- re: Telluride:
 - six months advanced notice was given to her representatives prior to Telluride. (not when Telluride announced on that friday- as Franklin claimed)
 - Franklin's lawyer, Arnold Reed, validated the WB contract with my lawyer, Todd Musburger before Reed got fired.
 - settlement language in previous and present agreement specifies "good faith negotiations."
 - interview published by detroit free press two weeks before detailing knowledge of toronto film festival. weird legal reading.
 - she has breached agreements for "good faith" both in Telluride and in prior 2011 settlement.
- detroit free press article on broken agreements: <http://www.freep.com/story/entertainment/music/brian-mccollum/2015/08/20/aretha-franklin-possible-injunction-amazing-grace-toronto/32078407/>
- History of shadiness: <http://www.deseretnews.com/article/681118/Refusal-to-pay-debts-tarnishing-Franklins-golden-image.html>
- Plainly, the film was made under contract with the full and complete compliance of Aretha Franklin.

Post-Denver/Telluride:

Court ordered "good faith negotiations."

we have offered every permutation(she can buy film, i'll await her passing... or she can have a million dollars)...

--

thank you.

-alan

phone: 323 988 9692

peace and love.

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: alan elliott (ucla) alanelliott@g.ucla.edu

Subject: Amazing Grace!!

Date: July 15, 2015 at 11:00 AM

To: harmoni@amazon.com

Cc: Ted Hope ted.hope@amazonstudios.com, Liesl Copland LCopland@wmeentertainment.com, Tom McGuire tmcguire@wmeentertainment.com, Todd W. Musburger todd@musburger.com, josh kra



hi harmoni

as todd and you discussed, i am sending:

- the insurance policy (see below- along with signed page from me as well)

- along with the email from the insurer with specific language (the policy has NO exclusions, the wb contract is fully covered bonded and includes the indemnification to atlantic records.)

if there are any questions, todd or i are available. now...

LET'S GO!!!

thank you.
-alan

phone: 323 988 9692

This email 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.

Begin forwarded message:

From: Stephen Carroll <stephen.carroll@aon.com>

Subject: FW: 2700815 Amazing Grace

Date: July 13, 2015 at 8:12:25 AM PDT

To: "alan elliott (ucla) (alanelliott@g.ucla.edu)" <alanelliott@g.ucla.edu>

Cc: Annette Shavuo <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 aware of the contract attached and that the insured is relying on this contract/document to make this film. We have vetted it's 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 exclusion 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 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
Connect with Hiscox online
Web 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

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 Contract Description for more details.

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.



From: Cruz, Harmoni harmoni@amazon.com 

Subject: RE: Amazing Grace!!

Date: July 15, 2015 at 11:13 AM

To: alan elliott (ucla) alanelliott@g.ucla.edu

Cc: Hope, Ted ted.hope@amazonstudios.com, Liesl Copland LCopland@wmeentertainment.com, Tom McGuire tmcguire@wmeentertainment.com, Todd W. Musburger todd@musburger.com

HC

Thanks, Alan. Confirming receipt. We'll review and circle back with any questions.

Best,
Harmoni

Harmoni Chinen Cruz
Corporate Counsel
1620 26th St., Ste. 4000N
Santa Monica, CA 90404
Phone: (310) 573-2467
Email: harmoni@amazon.com



image001.png

[Downloading...](#)

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

Sent: Wednesday, July 15, 2015 11:01 AM

To: Cruz, Harmoni

Cc: Hope, Ted; Liesl Copland; Tom McGuire; Todd W. Musburger

Subject: Amazing Grace!!

hi harmoni

as todd and you discussed, i am sending:

- the insurance policy (see below- along with signed page from me as well)

- along with the email from the insurer with specific language (the policy has NO exclusions, the wb contract is fully covered bonded and includes the indemnification to atlantic records.)

if there are any questions, todd or i are available. now...

LET'S GO!!!

thank you.

-alan

phone: 323 988 9692

This email 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.

Begin forwarded message:

From: Stephen Carroll <stephen.carroll@aon.com>
Subject: FW: 2700815 Amazing Grace
Date: July 13, 2015 at 8:12:25 AM PDT
To: "alan elliott (ucla)" (alanelliott@g.ucla.edu) <alanelliott@g.ucla.edu>
Cc: Annette Shavuo <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 let me know if you have any further questions.

Best,

Joann

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



image002.png

[Downloading...](#)

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



image003.jpg

[Downloading...](#)

(p.s.- question #22 has now been satisfied.)

From: Todd Musburger todd@musburger.com
Subject: "Amazing Grace"
Date: March 17, 2016 at 1:08 PM
To: Stephen Carroll stephen.carroll@aon.com, ALAN ELLIOTT alanelliott@g.ucla.edu



Hi Stephen: Lionsgate has asked us to add the following as additional insureds on the existing policy:

1. "Summit Entertainment, LLC, each partner therein and division thereof, and its respective parents, subsidiaries, and related entities, its distributors, licensees and assigns, and the respective officers, directors, shareholders, employees and agents of the foregoing, 2700 Colorado Avenue, Suite 200, Santa Monica, CA 90404"
2. "Entertainment One UK Ltd., its parent, subsidiaries and all associated, affiliated and related entities, its successors, assigns, licensees, sub-distributors, sub-licensees, exhibitors, broadcasters and advertisers, and the officers, directors, shareholders, attorneys, agents and employees of each of the foregoing, 120 New Cavendish Street, London W1W 6XX"
3. "JP Morgan Chase Bank, 1 Chase Manhattan Plaza, New York, NY 10005"

Please let me know if you have any additional questions...Thanks, Todd

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: amazing grace
Date: June 15, 2016 at 2:43 AM
To: Stephen Carroll stephen.carroll@aon.com
Cc: Todd W. Musburger todd@musburger.com



hi stephen

is there a time we can please get on the phone to discuss the policy today?

please let me know.

thank you.

-alan

phone: [323 988 9692](tel:3239889692)
peace and love.

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: amazing grace
Date: June 27, 2017 at 11:24 AM
To: Jay Brown jbrown@lskslaw.com



Hiscox_Amazing
Grace...7).PDF

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Amazing Grace
Date: August 11, 2017 at 11:21 AM
To: Walter Aldave waldave@chubb.com, Walter Aldave walter.aldave@chubb.com



hello walter

thank you again for your time and consideration.

i will send a few emails with a lot of helpful informations.

below is the timeline and the virtual dossier can be found here:

<http://alsrecordsandtapes.com/amazinglaw/wbdocs/>

thank you-

alan

here is hiscox turning down of coverage:



Amazing Grace
- Frank...OC.pdf

here is the timeline:

Amazing Grace:

Amazing Grace basic timeline:

In 1972, Warner films filmed "Amazing Grace"- a documentary film of the recording of the album of the same name. Warners hired Academy Award nominated director Sydney Pollack. The film was made with a film crew, a gospel choir and in a church. All members of the production signed releases/contracts. Ms. Franklin was under "personal service contract" with Warner films.

The release of the documentary was either to be a feature film or a television special and was intended and the film is made mention of inside the film and is included in the album's liner notes.

The movie was unable to be finished due to technical problems (syncing audio and video).

153 mins of the 20+hours of shooting were able to be put together.

Warner Films and Atlantic Records used the 153 minutes in at least two films:
"Atlantic Records 25th Anniversary" in 1973
"Aretha Frankl: Queen of Soul; American Masters" in 1986

Both films are produced by Warner films. "American Masters" was produced by Ms. Franklin and released jointly by Atlantic Records and Warner Films.

in 2007, Warner Films gave me quitclaim.

in 2010, new technology allowed for sync between the film with the audio.

Major points:

The film was made as a promotional film- common at the time. (Aretha made similar films which are currently available, including "Soul Sister," "Live at the Concertgebouw," "Live at the Fillmore"- all made between 1968-1972 and covered by the existing contract.) (<http://teachrock.org/resources/video/embed/aretha-franklin-abc-news-closeup-1968/>) (<http://www.concertvault.com/aretha-franklin/fillmore-west-march-05-1971.html>) (<http://www.grooves-inc.com/franklin-aretha-live-1968-the-concertgebouw-amsterdam-rodeo-media-dvd-video-album-pZZa1-859540375.html>)

In 1972, Atlantic Records (record company) and Warner Severn Arts (film company) were under Warner Communications

Why the film was not released in 1972:

The pre-digital limitation to sync the film and audio caused Warners to shelve the project in 1972. Over time, and with the sale of the music company, and because of the rerelease of the assets over time, the physical assets were spread out between the film and film companies. Many assets either needed sorting or could not be found when resurrection of the project began in 2007.

Granular Timeline:

In 1967, Aretha Franklin signed a recording contract with Atlantic Records.

In 1968, Aretha Franklin was the biggest artist at Atlantic Records and renegotiated a more wide ranging "personal services contract" that triangulates Ms. Franklin, Warner Films and Atlantic Records. (<http://alsrecordsandtapes.com/amazinglaw/wbdocs/judy%20noack%201998%20amazing%20grace.pdf>)

In January, 1972, Sydney Pollack, a film crew, musicians, choir and locations were hired (with unique documentation) by Warner Films to make "Amazing Grace."
(<http://alsrecordsandtapes.com/amazinglaw/wbdocs/amazing%20releases%20church%20choir.pdf>)
(<http://alsrecordsandtapes.com/amazinglaw/wbdocs/wb%20legal%20pollack%20payment.pdf>)
(<http://alsrecordsandtapes.com/amazinglaw/wbdocs/wb%20cinemobile%20rental.pdf>)

The co-star of the film, Reverend James Cleveland says during filming that "If you see all these cameras around, they are getting it together for Warner Brothers."

In August, 1972, the "Amazing Grace" LP was released by Atlantic Records. Ms. Franklin has approval over liner notes and art as per the 1968 Warner/Atlantic contract. The back of the album reads:

"Look for the film by Sydney Pollack."

(<http://alsrecordsandtapes.com/amazinglaw/wbdocs/amazingliner.jpg>)

In 1972, Mr. Pollack could not finish the film as the audio and film could not be put together to make a film. ([http://alsrecordsandtapes.com/amazinglaw/wbdocs/wb%20memo%20for%20lip%20sync%20\\$\\$\\$.pdf](http://alsrecordsandtapes.com/amazinglaw/wbdocs/wb%20memo%20for%20lip%20sync%20$$$.pdf))

In September, 1972, due to technical difficulties, Warner Films "wrote off" the film. (<http://alsrecordsandtapes.com/amazinglaw/wbdocs/wb%20write%20off.pdf>)

Over the years, excerpts of the "Amazing Grace" film have been used; including but not limited to: "Atlantic 25: The History of Atlantic Records" in 1973

(<http://alsrecordsandtapes.com/amazinglaw/wbdocs/ATLANTAFILMFESTIVAL.tiff>); [Aretha Franklin's American Masters: Aretha, the Queen of Soul in 1986](#) (produced by Ms. Franklin (<http://www.pbs.org/wnet/americanmasters/aretha-franklin-about-aretha-franklin/598/>)). All usages are done in reliance of the 1968 agreement between Ms. Franklin, Atlantic and Warners, with Atlantic Records and Warner Films (owners and distributors of the above two films). Clips from "Amazing Grace" are used across countless media since the original release of the footage in 1973 without any further documentation.

In 2003, Time Warner sold the Warner Music Group. (From 1967 until 2003, Warner Films and Atlantic Records were under the Time Warner umbrella.)

In In 2007, I gained quitclaim of all assets, including all contracts and releases for "Amazing Grace" from Warner Films. Warner Films could not locate Ms. Franklin's personal service contract. In my quitclaim, Warners asked for permission from Ms. Franklin. (<http://alsrecordsandtapes.com/amazinglaw/wbdocs/A-7,%202007%20Quitclaim%20Agreement.pdf>)

The 2011 agreement Ms. Franklin sued Mr. Elliott. Because Ms. Franklin claimed there was no contract and because we could not get access to her contract, a private settlement was reached without court jurisdiction.

In 2013, Warner Films discovered and provided (as per quitclaim) Ms. Franklin's contract to Mr. Elliott, providing proof of Ms. Franklin's legal permission to make the film.

In 2013, Warner Films discovered Ms. Franklin's contract. Warner Films affirmed that the 1968 contract fulfilled Ms. Franklin's permission. ([http://alsrecordsandtapes.com/amazinglaw/wbdocs/4-1-1968%20Aretha%20Franklin%20Recording%20Agreement%20\(Atlantic%20and%20Warner%20Bros.%20Se](http://alsrecordsandtapes.com/amazinglaw/wbdocs/4-1-1968%20Aretha%20Franklin%20Recording%20Agreement%20(Atlantic%20and%20Warner%20Bros.%20Se)

After discovering the contract, Todd Musburger, attorney for Mr. Elliott, advised Arnold Reed, attorney for Ms. Franklin, that the 2011 settlement was no longer applicable as it could not be enforced due to the ongoing exploitation of the film assets by Warner Films and others (including Ms. Franklin). These film assets had, in fact, been exploited since 1972 by Warner Films, Atlantic Records and Ms. Franklin.

In April, 2015, Mr. Elliott advised Rick Levy, Ms. Franklin's agent, that Mr. Elliott would premiere the film at the Telluride Film Festival in September, 2015.

On August 20, 2015, Mr. Reed and Ms. Franklin's interview with the Detroit Free Press was published. In the article, Ms. Franklin said, "I love the film." Mr. Reed. (<http://www.freep.com/story/entertainment/music/brian-mccollum/2015/08/20/aretha-franklin-possible-injunction-amazing-grace-toronto/32078407/>) The article states, two weeks before the Telluride Film Festival and three weeks prior to the Toronto Film Festival that "The film is already one of the most buzzed-about documentaries on the Toronto docket."

On September 4, 2015, Ms. Franklin received a 14 day injunction from the tenth circuit.

Continuance stipulations were entered which specifies "good faith negotiations."

The film was purchased by Lionsgate Films following the Toronto Film Festival in September, 2015.

Negotiations:

Between 2007 and the present, Mr. Elliott and his representatives have tried to negotiate with seven or more lawyers over four different law firms, five different agents across two different agencies, many different publicists/managers/friends of Ms. Franklin.

Ms. Franklin asked for 50% of film and \$1m advance but is not sharing record royalties. The film (me) does not share in record receipts (estimated by wmg as \$3-5m over five years).

After 15 consecutive months post-Telluride, 2015, on December 30, 2016, Ms. Franklin turned down \$1.125m and 50% of Mr. Elliott's shares in the film.

Errors from the hearing:

1.

- Q: "When did you become aware that this film would be shown at the Telluride Film Festival?"
- A (Ms. Franklin): A few days ago. I read about it online.

Truth: Ms. Franklin gave an interview with the Detroit Free Press two weeks prior in which they discussed the film being shown at the film festival. The headline reads: **Aretha Franklin considers legal action to halt film**

Further: Mr. Elliott had a meeting with Ms. Franklin's representative Rick Levy Of ICM on April 22, 2015 where Mr. Elliott informed Mr. Levy of the Telluride and Toronto Film Festivals.

Mr. Elliott's lawyer Todd Musburger negotiated with Ms. Franklin's attorney Arnold Reed over the intervening time between the Elliott/Levy meeting.

Mr. Reed, when presented with Ms. Franklin's contract by Mr. Musburger, affirmed the contract.

2.

- A (Ms. Franklin): They didn't have my approval... he was going to use my name and likeness and use my name to reap financial benefits.
- Q: You mentioned your name and likeness. Is that important to you?
- A (Ms. Franklin): Oh, absolutely. For them to show that film and to... ignore me where my name and reputation, my concern, would be terrible."

Ms. Franklin, in the Detroit Free Press interview, said, "I love the film."

3.

- Q: Do you allow people to videotape your concerts?
- A (Ms. Franklin): No, not without my approval.

In the liner notes for Ms. Franklin's "Amazing Grace" album (notes she has approval over contractually), it reads: "The recording of this album was filmed by Warner Brothers, Inc. with Sidney Pollack directing."

- warners selling the record company and not having contract
- warners/atlantic withholding the contract

4.

- In Ms. Franklin's affidavit, she claims in 3. that "The recording of "Amazing Grace" was videotaped."

There was a 16mm film crew with five cameras and an Oscar nominated director, Sydney Pollack.

While videotape is similar for film, the planning to have Mr. Pollack's, his crew, the coordinating and cooperation of Warner Films and Atlantic Records, the audio crew, the location planning, the setting up of lights, the planning and execution of contracts and setting up of obstreperous equipment of the day (1972) was a big undertaking.

5.

- In Ms. Franklin's affidavit, she claims in 5. that she "never gave permission... to any entity granting permission to use my name and likeness for commercial purposes with regards to the "Amazing Grace" film, or any film footage or audio recording..."

The audio recording of "Amazing Grace" has been the best selling Gospel album of all time since it's release by Atlantic Records in 1972, amongst many untruths about this statement.

[http://alsrecordsandtapes.com/amazinglaw/wbdocs/\[10-11%20Affidavit%20of%20Aretha%20Franklin%20\(01499915xA6534\).pdf](http://alsrecordsandtapes.com/amazinglaw/wbdocs/[10-11%20Affidavit%20of%20Aretha%20Franklin%20(01499915xA6534).pdf)

6.

- In Ms. Franklin's affidavit, she claims in 8. that "In August 2015, I discovered that Mr. Elliott plans to show the film at the Toronto Film Festival. Mr. Elliott gave me no notice of his intent to show the film at the Toronto Film Festival. I found out after seeing it on the internet."
- In Ms. Franklin's affidavit, she claims in 9. that "On September 3, 2015, I discovered that Alan Elliott plans to show the film at the Telluride Film Festival"
- In Ms. Franklin's affidavit, she claims in 10. that "No representatives of the Toronto Film Festival or the Telluride Film Festival have contacted me regarding their planned showing of the film."

Mr. Elliott had a meeting with Ms. Franklin's representative Rick Levy Of ICM on April 22, 2015 where Mr. Elliott informed Mr. Levy of the Telluride and Toronto Film Festivals.

Mr. Elliott's lawyer Todd Musburger negotiated with Ms. Franklin's attorney Arnold Reed continually over the intervening time between April 22, 2015 and the day Mr. Reed was fired days before the trial. Mr. Reed, when presented with Ms. Franklin's contract by Mr. Musburger, affirmed the contract.

Ms. Franklin, in a published interview with the Detroit Free Press two weeks prior to the Telluride Film Festival, the article reads: "'Amazing Grace,' which captures a star-studded gospel service headlined by Franklin in 1972, is scheduled to premiere on opening night of September's prestigious Toronto International Film Festival."

Ms. Franklin's lawyers, including Arnold Reed and David Bennett were both informed months before the festivals and Mr. Reed negotiated. Mr. Reed discussed the pending festivals in an interview with the Detroit

festivals and Mr. Reed negotiated. Mr. Reed discussed the pending festivals in an interview with the Detroit Free Press.

[http://alsrecordsandtapes.com/amazinglaw/wbdocs/\[10-1\]%20Affidavit%20of%20Aretha%20Franklin%20\(01499915xA6534\).pdf](http://alsrecordsandtapes.com/amazinglaw/wbdocs/[10-1]%20Affidavit%20of%20Aretha%20Franklin%20(01499915xA6534).pdf)

7.

- In Ms. Franklin's affidavit, she claims in 11., that "I believe that the right as to when my concert footage should be seen publicly, and under what conditions, is a right that belongs to me. I have never given that right with respect to the 1972 concert to anyone else."

Ms. Franklin's contract is specific.

"4. **All recording hereunder and all derivatives made therefrom, together with the performances embodied thereon, shall be entirely Company's property.**

Artist grants to Company ...(b) the right to use and publish, and to permit others to use and publish, the Artist's name and likeness...

This is the only contract which continues, since 1968, to be relied upon by Ms. Franklin, Atlantic Records and Warner Films.

Film of this specific concert has been used and licensed countless times by Ms. Franklin, Atlantic Records and Warner Films and continues to be displayed across all media as it has since 1973, including, but not limited to:

- commercial films
- documentary films
- television
- film clips
- YouTube

Aretha Franklin's personal service contract with Warner Films and Atlantic Records:

Warner Bros. and Atlantic Records continue to rely upon Ms. Franklin's personal service contract as they have for 49 years. The personal service contract covers all aspects of Ms. Franklin's "personal services" including film, tv, videos and recordings. This contract has been used to make LPs, Cds, Digital downloads, Videos, Cassettes, DVDs and whatever other coming reproductions. Ms. Franklin's personal service contract is what Warner Films, Atlantic Records and Ms. Franklin relied upon to make the film.

Ms. Franklin was always aware since the initial filming in 1972 of Warner Films' intent to make and distribute "Amazing Grace." She has never produced any documentation showing otherwise.

Ms. Franklin's contract is specific.

"4. **All recording hereunder and all derivatives made therefrom, together with the performances embodied thereon, shall be entirely Company's property.**

Artist grants to Company ...(b) the right to use and publish, and to permit others to use and publish, the Artist's name and likeness...

(c) the sole and exclusive rights in, title to and ownership, including, but not limited to, the right to use and control all masters, matrices, records or other reproductions of the performances embodied in such recordings by any method, electronic, magnetic, mechanical or other, now or hereafter know, obtained from recordings made here- under the performances embodied therein;

(d) the sole and exclusive right, if Company so desires, to to permit the public performances thereof, by means of radio broadcast or otherwise;"

Why the film was never released:

Why the film was never released.

The reason the film was written off by Warner Brothers was because, due to technical difficulties, the film and music could not be put in sync. (document).

Telluride:

Ms. Franklin's contract, while hard to digest in an emergency session.

Atlantic Records refused Mr. Elliott access to Ms. Franklin's contract. Warner Films produced their copy of the personal service contract in 2013 after which Mr. Elliott, with the blessing of Warner Films, moved forward to finish the film for sale.

Plainly, there are releases for everyone in the production. The amount of information in terms of releases, contracts and planning are thorough and detailed. Every musician, choir member (even POTENTIAL choir members- those who could be possible replacements) are documented and accounted for with separate releases. Every 16 track tape, every 2 track tape, every piece of film was accounted for by, at the time, the largest film and music companies. Warners and Atlantic had a success a year prior with "Woodstock" and they were intent on duplicating a "synergy" between the film and music companies and had all ready used the blueprint (and would use it again and again).

Ms. Franklin presented to the court that she had no contract. However, after years of investigation, it is indisputable that Warner Films and Atlantic Records relied upon her personal services contract to make and distribute "Amazing Grace."

Fallout:

Ms. Franklin's offense rests on Warner Films mislabeling her contract when the company digitized it's paperwork from 40 years prior.

Ms. Franklin brought nuisance suits against Mr. Elliott, bullying him into agreements through threats, when in fact she had a contract which was being used the entire time and which she continues to collect on to this day.

Ms. Franklin took advantage of Mr. Elliott's lack of access to her contract.

- Detroit Free Press (<http://www.freep.com/story/entertainment/music/brian-mccollum/2015/08/20/aretha-franklin-possible-injunction-amazing-grace-toronto/32078407/>):

"Franklin's attorney cast doubt on the validity of the 1972 contract Elliott said he has since turned up.

'The Titanic will surface before this letter surfaces,' said Reed, adding that he has advised Elliott's attorney not to proceed with the Toronto screening.

Such a contract would be irrelevant anyway, Reed said, because of the 2011 settlement agreement."

— —

- every defense presented by Ms. Franklin has been done under false pretense:
 - she has a contract.
 - I would never have signed reed agreement if she had disclosed contract.
 - clearly every other thing is covered in ms franklin's contract. records, film, television.
 - wb either paid aretha the rate in the contract or considered it "promotional."
 - no responsibility to interpret what might have been negotiated- no [proof there was any intended payment.](#)
 - can't disentangle/carve out of this specific film- there is no other documents.
 - fillmore east is currently [being sold.](#)
 - abc documentary: 30 mins.: <http://teachrock.org/resources/video/embed/aretha-franklin-abc-news-closeup-1968/>
 - american masters: <http://www.pbs.org/wnet/americanmasters/aretha-franklin-about-aretha-franklin/598/>
 - bob rooyens film "live at concertgebouw" (<http://www.grooves-inc.com/franklin-aretha-live-1968-the-concertgebouw-amsterdam-rodeo-media-dvd-video-album-pZZa1-859540375.html>) (<http://www.jazzwax.com/2016/02/aretha-in-amsterdam-1968.html>)

- (http://www.openculture.com/2012/08/the_queen_of_soul_conquers_europe_aretha_franklin_in_amsterdam_1968.html)-12 songs... it's for sale now
 - (<https://www.redbullet.nl/en/organisation/onset/>) (<http://www.northendhaarlem.nl/a-23574769/dvd-muziek/aretha-franklin-live-at-concertgebouw-1968-dvd/>)
 - 34 songs currently being "licensed" at reelin' in the years from the time under contract (http://reelintheyears.com/database-search/?stage=show_results)
 - wgbh licenses (<http://reelintheyears.com/wgbh-boston-and-reelin-in-the-years-productions-partner-to-license-music-footage/>)
- film from "Amazing Grace" is currently used- repeatedly. Countless. MTV, VH1, BET...
 - bet honors
 - kennedy center honors
 - photos are used from the filming.
 - album liner notes- she has approval: <http://alsrecordsandtapes.com/amazinglaw/wbdocs/amazingliner.jpg>
- no further documentation- only WB contract.
- The film was unreleased because of technical difficulties: film could not be synced with music (show memo)
- agreed with representative to a contract.
 - Lionsgate
 - Concord
- re: Telluride:
 - six months advanced notice was given to her representatives prior to Telluride. (not when Telluride announced on that friday- as Franklin claimed)
 - Franklin's lawyer, Arnold Reed, validated the WB contract with my lawyer, Todd Musburger before Reed got fired.
 - settlement language in previous and present agreement specifies "good faith negotiations."
 - interview published by detroit free press two weeks before detailing knowledge of toronto film festival. weird legal reading.
 - she has breached agreements for "good faith" both in Telluride and in prior 2011 settlement.
- detroit free press article on broken agreements: <http://www.freep.com/story/entertainment/music/brian-mccollum/2015/08/20/aretha-franklin-possible-injunction-amazing-grace-toronto/32078407/>
- History of shadiness: <http://www.deseretnews.com/article/681118/Refusal-to-pay-debts-tarnishing-Franklins-golden-image.html>
- Plainly, the film was made under contract with the full and complete compliance of Aretha Franklin.

Assets:

Because this recording was made for both the film and record companies, there was a thorough delineation and separation of assets.

Atlantic Records had one set of the 16 track audio recordings. Because they paid for all filming, Warner Films owned the film assets of "Amazing Grace." Warner Films also had another set of 16 track audio recordings (for use with the film).

All of the planning for "Amazing Grace" required high profile professional planning. Ms. Franklin was a big star for the record company and was working with an Academy Award nominated director (Sydney Pollack) for one of the largest film companies (Warner Films).

Post-Denver/Telluride:

Court ordered "good faith negotiations."

we have offered every permutation (she can buy film, i'll await her passing... or she can have a million dollars)...

what rights does she have to block the film?

possibilities:

- telluride should tell judge they want to show the movie.
- film is always being shown. wb is my partner.
- mediation

- mediation.

court mandates good faith negotiations.

court documents as

unwind "respect" from ag?

why did the judge hear the case in the first place? there was no fire!

mentioned toronto in article...

contract

- movie is still being shown
- hard to tug at thread
- fillmore
- precedent

fired lawyers

- arnold reed
- jonathan cantor

don wilson

respect

- she asked for

contract is there.

court documents:

For "Amazing Grace" Warner Films secured and relied upon many different contracts for each filmed cast and crew member, including the choir, the band, the church location and the film's director.

The documentation is thorough and intact.

It is equally clear that Warners and Ms. Franklin relied upon her personal service contract with Warner Films and Atlantic Records for her participation in the film.

the court ruling is too broad- the film was shown... is shown... and Elliott's partnership with warner brothers

In addition, Warner Seven Arts and Atlantic relied upon Ms. Franklin's contract on at least two occasions to distribute the film in different iterations, including "American Masters: the Queen of Soul" which Ms. Franklin produced.

In addition, Ms. Franklin's concerts from the Fillmore West are currently for sale at Wolfgang's Vault at http://www.concertvault.com/aretha-franklin/video/respect_1203725099.html.

other docs:

<http://www.wxyz.com/news/region/detroit/aretha-franklins-documents-recordings-found-by-man-in-detroit-home>

options:

- 1) she could buy the film from me.
- 2) i would not release it while she is alive if she would like to negotiate that.
- 3) go to court

thank you.

-alan

phone: 323 988 9692

peace and love.

thank you.

-alan

phone: 323 988 9692

peace and love.

From: alan elliot (ucla) alanelliott@g.ucla.edu 
Subject: Amazing Grace
Date: July 18, 2017 at 5:19 PM
To: Chad Milton cemilton@mediariskconsultants.com



hello chad

thank you again for your time and consideration.

in case you have some down time and to get you the info in advance...

i will send a few emails with a lot of helpful informations.

below is the timeline and the virtual dossier can be found here:

<http://alsrecordsandtapes.com/amazinglaw/wbdocs/>

i look forward to talking with you wednesday.

thank you-

alan

here is hiscox turning down of coverage:



Amazing Grace
- Frank...OC.pdf

here is the timeline:

Amazing Grace:

Amazing Grace basic timeline:

In 1972, Warner films filmed "Amazing Grace"- a documentary film of the recording of the album of the same name. Warners hired Academy Award nominated director Sydney Pollack. The film was made with a film crew, a gospel choir and in a church. All members of the production signed releases/contracts. Ms. Franklin was under "personal service contract" with Warner films.

The release of the documentary was either to be a feature film or a television special and was intended and the film is made mention of inside the film and is included in the album's liner notes.

The movie was unable to be finished due to technical problems (syncing audio and video).

153 mins of the 20+hours of shooting were able to be put together.

Warner Films and Atlantic Records used the 153 minutes in at least two films:

"Atlantic Records 25th Anniversary" in 1973

"Aretha Frankl: Queen of Soul; American Masters" in 1986

Both films are produced by Warner films. "American Masters" was produced by Ms. Franklin and released jointly by Atlantic Records and Warner Films.

in 2007, Warner Films gave me quitclaim.

in 2010, new technology allowed for sync between the film with the audio.

Major points:

The film was made as a promotional film- common at the time. (Aretha made similar films which are currently available, including "Soul Sister," "Live at the Concertgrabouw," "Live at the Filmore"- all made between 1968-1972 and covered by the existing contract.) (<http://teachrock.org/resources/video/embed/aretha-franklin-abc-news-closeup-1968/>) (<http://www.concertvault.com/aretha-franklin/fillmore-west-march-05-1971.html>) (<http://www.grooves-inc.com/franklin-aretha-live-1968-the-concertgebouw-amsterdam-rodeo-media-dvd-video-album-nZZa1-859540375.html>)

In 1972, Atlantic Records (record company) and Warner Severn Arts (film company) were under Warner Communications

Why the film was not released in 1972:

The pre-digital limitation to sync the film and audio caused Warners to shelve the project in 1972. Over time, and with the sale of the music company, and because of the rerelease of the assets over time, the physical assets were spread out between the film and film companies. Many assets either needed sorting or could not be found when resurrection of the project began in 2007.

Granular Timeline:

In 1967, Aretha Franklin signed a recording contract with Atlantic Records.

In 1968, Aretha Franklin was the biggest artist at Atlantic Records and renegotiated a more wide ranging “personal services contract” that triangulates Ms. Franklin, Warner Films and Atlantic Records. (<http://alsrecordsandtapes.com/amazinglaw/wbdocs/judy%20noack%201998%20amazing%20grace.pdf>)

In January, 1972, Sydney Pollack, a film crew, musicians, choir and locations were hired (with unique documentation) by Warner Films to make “Amazing Grace.” (<http://alsrecordsandtapes.com/amazinglaw/wbdocs/amazing%20releases%20church%20choir.pdf>) (<http://alsrecordsandtapes.com/amazinglaw/wbdocs/wb%20legal%20pollack%20payment.pdf>) (<http://alsrecordsandtapes.com/amazinglaw/wbdocs/wb%20cinemobile%20rental.pdf>)

The co-star of the film, Reverend James Cleveland says during filming that “If you see all these cameras around, they are getting it together for Warner Brothers.”

In August, 1972, the “Amazing Grace” LP was released by Atlantic Records. Ms. Franklin has approval over liner notes and art as per the 1968 Warner/Atlantic contract. The back of the album reads:

“Look for the film by Sydney Pollack.”

(<http://alsrecordsandtapes.com/amazinglaw/wbdocs/amazingliner.jpg>)

In 1972, Mr. Pollack could not finish the film as the audio and film could not be put together to make a film. ([http://alsrecordsandtapes.com/amazinglaw/wbdocs/wb%20memo%20for%20lip%20sync%20\\$.pdf](http://alsrecordsandtapes.com/amazinglaw/wbdocs/wb%20memo%20for%20lip%20sync%20$.pdf))

In September, 1972, due to technical difficulties, Warner Films “wrote off” the film. (<http://alsrecordsandtapes.com/amazinglaw/wbdocs/wb%20write%20off.pdf>)

Over the years, excerpts of the “Amazing Grace” film have been used; including but not limited to: “Atlantic 25: The History of Atlantic Records” in 1973 (<http://alsrecordsandtapes.com/amazinglaw/wbdocs/ATLANTAFILMFESTIVAL.tiff>); [Aretha Franklin’s American Masters: Aretha, the Queen of Soul in 1986](#) (produced by Ms. Franklin (<http://www.pbs.org/wnet/americanmasters/aretha-franklin-about-aretha-franklin/598/>)). All usages are done in reliance of the 1968 agreement between Ms. Franklin, Atlantic and Warners, with Atlantic Records and Warner Films (owners and distributors of the above two films). Clips from “Amazing Grace” are used across countless media since the original release of the footage in 1973 without any further documentation.

In 2003, Time Warner sold the Warner Music Group. (From 1967 until 2003, Warner Films and Atlantic Records were under the Time Warner umbrella.)

In In 2007, I gained quitclaim of all assets, including all contracts and releases for “Amazing Grace” from Warner Films. Warner Films could not locate Ms. Franklin’s personal service contract. In my quitclaim, Warners asked for permission from Ms. Franklin. (<http://alsrecordsandtapes.com/amazinglaw/wbdocs/A-7,%202007%20Quitclaim%20Agreement.pdf>)

The 2011 agreement Ms. Franklin sued Mr. Elliott. Because Ms. Franklin claimed there was no contract and because we could not get access to her contract, a private settlement was reached without court jurisdiction.

In 2013, Warner Films discovered and provided (as per quitclaim) Ms. Franklin’s contract to Mr. Elliott, providing proof of Ms. Franklin’s legal permission to make the film.

In 2013, Warner Films discovered Ms. Franklin's contract. Warner Films affirmed that the 1968 contract fulfilled Ms. Franklin's permission. ([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))

After discovering the contract, Todd Musburger, attorney for Mr. Elliott, advised Arnold Reed, attorney for Ms. Franklin, that the 2011 settlement was no longer applicable as it could not be enforced due to the ongoing exploitation of the film assets by Warner Films and others (including Ms. Franklin). These film assets had, in fact, been exploited since 1972 by Warner Films, Atlantic Records and Ms. Franklin.

In April, 2015, Mr. Elliott advised Rick Levy, Ms. Franklin's agent, that Mr. Elliott would premiere the film at the Telluride Film Festival in September, 2015.

On August 20, 2015, Mr. Reed and Ms. Franklin's interview with the Detroit Free Press was published. In the article, Ms. Franklin said, "I love the film." Mr. Reed. (<http://www.freep.com/story/entertainment/music/brian-mccollum/2015/08/20/aretha-franklin-possible-injunction-amazing-grace-toronto/32078407/>) The article states, two weeks before the Telluride Film Festival and three weeks prior to the Toronto Film Festival that "The film is already one of the most buzzed-about documentaries on the Toronto docket."

On September 4, 2015, Ms. Franklin received a 14 day injunction from the tenth circuit.

Continuance stipulations were entered which specifies "good faith negotiations."

The film was purchased by Lionsgate Films following the Toronto Film Festival in September, 2015.

Negotiations:

Between 2007 and the present, Mr. Elliott and his representatives have tried to negotiate with seven or more lawyers over four different law firms, five different agents across two different agencies, many different publicists/managers/friends of Ms. Franklin.

Ms. Franklin asked for 50% of film and \$1m advance but is not sharing record royalties. The film (me) does not share in record receipts (estimated by wmg as \$3-5m over five years).

After 15 consecutive months post-Telluride, 2015, on December 30, 2016, Ms. Franklin turned down \$1.125m and 50% of Mr. Elliott's shares in the film.

Errors from the hearing:

1.

- Q: "When did you become aware that this film would be shown at the Telluride Film Festival?"
- A (Ms. Franklin): A few days ago. I read about it online.

Truth: Ms. Franklin gave an interview with the Detroit Free Press two weeks prior in which they discussed the film being shown at the film festival. The headline reads: **Aretha Franklin considers legal action to halt film**

Further: Mr. Elliott had a meeting with Ms. Franklin's representative Rick Levy Of ICM on April 22, 2015 where Mr. Elliott informed Mr. Levy of the Telluride and Toronto Film Festivals.

Mr. Elliott's lawyer Todd Musburger negotiated with Ms. Franklin's attorney Arnold Reed over the intervening time between the Elliott/Levy meeting.

Mr. Reed, when presented with Ms. Franklin's contract by Mr. Musburger, affirmed the contract.

2.

- A (Ms. Franklin): They didn't have my approval... he was going to use my name and likeness and use my name to reap financial benefits.
- Q: You mentioned your name and likeness. Is that important to you?
- A (Ms. Franklin): Oh, absolutely. For them to show that film and to... ignore me where my name and reputation, my concern, would be terrible."

Ms. Franklin, in the Detroit Free Press interview, said, "I love the film."

3.

- Q: Do you allow people to videotape your concerts?
- A (Ms. Franklin): No, not without my approval.

In the liner notes for Ms. Franklin's "Amazing Grace" album (notes she has approval over contractually), it reads: "The recording of this album was filmed by Warner Brothers, Inc. with Sidney Pollack directing."

- warners selling the record company and not having contract
- warners/atlantic withholding the contract

4.

- In Ms. Franklin's affidavit, she claims in 3. that "The recording of "Amazing Grace" was videotaped."

There was a 16mm film crew with five cameras and an Oscar nominated director, Sydney Pollack.

While videotape is similar for film, the planning to have Mr. Pollack's, his crew, the coordinating and cooperation of Warner Films and Atlantic Records, the audio crew, the location planning, the setting up of lights, the planning and execution of contracts and setting up of obstreperous equipment of the day (1972) was a big undertaking.

5.

- In Ms. Franklin's affidavit, she claims in 5. that she "never gave permission... to any entity granting permission to use my name and likeness for commercial purposes with regards to the "Amazing Grace" film, or any film footage or audio recording..."

The audio recording of "Amazing Grace" has been the best selling Gospel album of all time since its release by Atlantic Records in 1972, amongst many untruths about this statement.

[http://alsrecordsandtapes.com/amazinglaw/wbdocs/\[10-1\]%20Affidavit%20of%20Aretha%20Franklin%20\(01499915xA6534\).pdf](http://alsrecordsandtapes.com/amazinglaw/wbdocs/[10-1]%20Affidavit%20of%20Aretha%20Franklin%20(01499915xA6534).pdf)

6.

- In Ms. Franklin's affidavit, she claims in 8. that "In August 2015, I discovered that Mr. Elliott plans to show the film at the Toronto Film Festival. Mr. Elliott gave me no notice of his intent to show the film at the Toronto Film Festival. I found out after seeing it on the internet."
- In Ms. Franklin's affidavit, she claims in 9. that "On September 3, 2015, I discovered that Alan Elliott plans to show the film at the Telluride Film Festival"
- In Ms. Franklin's affidavit, she claims in 10. that "No representatives of the Toronto Film Festival or the Telluride Film Festival have contacted me regarding their planned showing of the film."

Mr. Elliott had a meeting with Ms. Franklin's representative Rick Levy Of ICM on April 22, 2015 where Mr. Elliott informed Mr. Levy of the Telluride and Toronto Film Festivals.

Mr. Elliott's lawyer Todd Musburger negotiated with Ms. Franklin's attorney Arnold Reed continually over the intervening time between April 22, 2015 and the day Mr. Reed was fired days before the trial. Mr. Reed, when presented with Ms. Franklin's contract by Mr. Musburger, affirmed the contract.

Ms. Franklin, in a published interview with the Detroit Free Press two weeks prior to the Telluride Film Festival, the article reads: "'Amazing Grace,' which captures a star-studded gospel service headlined by Franklin in 1972, is scheduled to premiere on opening night of September's prestigious Toronto International Film

Festival.”

Ms. Franklin’s lawyers, including Arnold Reed and David Bennett were both informed months before the festivals and Mr. Reed negotiated. Mr. Reed discussed the pending festivals in an interview with the Detroit Free Press.

[http://alsrecordsandtapes.com/amazinglaw/wbdocs/\[10-1\]%20Affidavit%20of%20Aretha%20Franklin%20\(01499915xA6534\).pdf](http://alsrecordsandtapes.com/amazinglaw/wbdocs/[10-1]%20Affidavit%20of%20Aretha%20Franklin%20(01499915xA6534).pdf)

7.

- In Ms. Franklin’s affidavit, she claims in 11., that “I believe that the right as to when my concert footage should be seen publicly, and under what conditions, is a right that belongs to me. I have never given that right with respect to the 1972 concert to anyone else.”

Ms. Franklin’s contract is specific.

"4. All recording hereunder and all derivates made therefrom, together with the performances embodied thereon, shall be entirely Company's property.

Artist grants to Company ...(b) the right to use and publish, and to permit others to use and publish, the Artist's name and likeness...

This is the only contract which continues, since 1968, to be relied upon by Ms. Franklin, Atlantic Records and Warner Films.

Film of this specific concert has been used and licensed countless times by Ms. Franklin, Atlantic Records and Warner Films and continues to be displayed across all media as it has since 1973, including, but not limited to:

- commercial films
- documentary films
- television
- film clips
- YouTube

Aretha Franklin’s personal service contract with Warner Films and Atlantic Records:

Warner Bros. and Atlantic Records continue to rely upon Ms. Franklin's personal service contract as they have for 49 years. The personal service contract covers all aspects of Ms. Franklin’s “personal services” including film, tv, videos and recordings. This contract has been used to make LPs, Cds, Digital downloads, Videos, Cassettes, DVDs and whatever other coming reproductions. Ms. Franklin’s personal service contract is what Warner Films, Atlantic Records and Ms. Franklin relied upon to make the film.

Ms. Franklin was always aware since the initial filming in 1972 of Warner Films’ intent to make and distribute “Amazing Grace.” She has never produced any documentation showing otherwise.

Ms. Franklin’s contract is specific.

"4. All recording hereunder and all derivates made therefrom, together with the performances embodied thereon, shall be entirely Company's property.

Artist grants to Company ...(b) the right to use and publish, and to permit others to use and publish, the Artist's name and likeness...

(c) the sole and exclusive rights in, title to and ownership, including, but not limited to, the right to use and control all masters, matrices, records or other reproductions of the performances embodied in such recordings by any method, electronic, magnetic, mechanical or other, now or hereafter know, obtained from recordings made here- under the performances embodied therein;

(d) the sole and exclusive right if Company so desires to to permit the public performances

(4) the sole and exclusive right, if Company so desires, to permit the public performances thereof, by means of radio broadcast or otherwise;"

Why the film was never released:

The reason the film was written off by Warner Brothers was because, due to technical difficulties, the film and music could not be put in sync. (document).

Telluride:

Ms. Franklin's contract, while hard to digest in an emergency session.

Atlantic Records refused Mr. Elliott access to Ms. Franklin's contract. Warner Films produced their copy of the personal service contract in 2013 after which Mr. Elliott, with the blessing of Warner Films, moved forward to finish the film for sale.

Plainly, there are releases for everyone in the production. The amount of information in terms of releases, contracts and planning are thorough and detailed. Every musician, choir member (even POTENTIAL choir members- those who could be possible replacements) are documented and accounted for with separate releases. Every 16 track tape, every 2 track tape, every piece of film was accounted for by, at the time, the largest film and music companies. Warners and Atlantic had a success a year prior with "Woodstock" and they were intent on duplicating a "synergy" between the film and music companies and had all ready used the blueprint (and would use it again and again).

Ms. Franklin presented to the court that she had no contract. However, after years of investigation, it is indisputable that Warner Films and Atlantic Records relied upon her personal services contract to make and distribute "Amazing Grace."

Fallout:

Ms. Franklin's offense rests on Warner Films mislabeling her contract when the company digitized it's paperwork from 40 years prior.

Ms. Franklin brought nuisance suits against Mr. Elliott, bullying him into agreements through threats, when in fact she had a contract which was being used the entire time and which she continues to collect on to this day.

Ms. Franklin took advantage of Mr. Elliott's lack of access to her contract.

- Detroit Free Press (<http://www.freep.com/story/entertainment/music/brian-mccollum/2015/08/20/aretha-franklin-possible-injunction-amazing-grace-toronto/32078407/>):

"Franklin's attorney cast doubt on the validity of the 1972 contract Elliott said he has since turned up.

'The Titanic will surface before this letter surfaces,' said Reed, adding that he has advised Elliott's attorney not to proceed with the Toronto screening.

Such a contract would be irrelevant anyway, Reed said, because of the 2011 settlement agreement."

--

- every defense presented by Ms. Franklin has been done under false pretense:
 - she has a contract.
 - I would never have signed reed agreement if she had disclosed contract.
 - clearly every other thing is covered in ms franklin's contract. records, film, television.
 - wb either paid aretha the rate in the contract or considered it "promotional."
 - no responsibility to interpret what might have been negotiated- no [proof there was any intended payment.](#)
 - can't disentangle/carve out of this specific film- there is no other documents.
 - fillmore east is currently [being sold.](#)
 - abc documentary: 30 mins.: <http://teachrock.org/resources/video/embed/aretha-franklin-abc-news-closeup-1968/>
 - american masters: <http://www.pbs.org/wnet/americanmasters/aretha-franklin-about-aretha-franklin/598/>

- bob rooyens film "live at concertgebouw" (<http://www.grooves-inc.com/franklin-aretha-live-1968-the-concertgebouw-amsterdam-rodeo-media-dvd-video-album-pZZa1-859540375.html>) (<http://www.jazzwax.com/2016/02/aretha-in-amsterdam-1968.html>) (<http://www.openculture.com/2012/08/the-queen-of-soul-conquers-europe-aretha-franklin-in-amsterdam-1968.html>)-12 songs... it's for sale now (<https://www.redbullet.nl/en/organisation/onset/>) (<http://www.northendhaarlem.nl/a-23574769/dvd-muziek/aretha-franklin-live-at-concertgebouw-1968-dvd/>)
- 34 songs currently being "licensed" at reelin' in the years from the time under contract (http://reelintheyears.com/database-search/?stage=show_results)
- wgbh licenses (<http://reelintheyears.com/wgbh-boston-and-reelin-in-the-years-productions-partner-to-license-music-footage/>)
- film from "Amazing Grace" is currently used- repeatedly. Countless. MTV, VH1, BET...
 - bet honors
 - kennedy center honors
 - photos are used from the filming.
 - album liner notes- she has approval: <http://alsrecordsandtapes.com/amazinglaw/wbdocs/amazingliner.jpg>
- no further documentation- only WB contract.
- The film was unreleased because of technical difficulties: film could not be synced with music (show memo)
- agreed with representative to a contract.
 - Lionsgate
 - Concord
- re: Telluride:
 - six months advanced notice was given to her representatives prior to Telluride. (not when Telluride announced on that friday- as Franklin claimed)
 - Franklin's lawyer, Arnold Reed, validated the WB contract with my lawyer, Todd Musburger before Reed got fired.
 - settlement language in previous and present agreement specifies "good faith negotiations."
 - interview published by detroit free press two weeks before detailing knowledge of toronto film festival. weird legal reading.
 - she has breached agreements for "good faith" both in Telluride and in prior 2011 settlement.
- detroit free press article on broken agreements: <http://www.freep.com/story/entertainment/music/brian-mccollum/2015/08/20/aretha-franklin-possible-injunction-amazing-grace-toronto/32078407/>
- History of shadiness: <http://www.deseretnews.com/article/681118/Refusal-to-pay-debts-tarnishing-Franklins-golden-image.html>
- Plainly, the film was made under contract with the full and complete compliance of Aretha Franklin.

Assets:

Because this recording was made for both the film and record companies, there was a thorough delineation and separation of assets.

Atlantic Records had one set of the 16 track audio recordings. Because they paid for all filming, Warner Films owned the film assets of "Amazing Grace." Warner Films also had another set of 16 track audio recordings (for use with the film).

All of the planning for "Amazing Grace" required high profile professional planning. Ms. Franklin was a big star for the record company and was working with an Academy Award nominated director (Sydney Pollack) for one of the largest film companies (Warner Films).

Post-Denver/Telluride:

Court ordered "good faith negotiations."

we have offered every permutation (she can buy film, i'll await her passing... or she can have a million dollars)...

what rights does she have to block the film?

possibilities:

- telluride should tell judge they want to show the movie.
- film is always being shown. wb is my partner.
- mediation.

court mandates good faith negotiations.

court documents as

unwind “respect” from ag?

why did the judge hear the case in the first place? there was no fire!

mentioned toronto in article...

contract

- movie is still being shown
- hard to tug at thread
- fillmore
- precedent

fired lawyers

- arnold reed
- jonathan cantor

don wilson

respect

- she asked for

contract is there.

court documents:

For “Amazing Grace” Warner Films secured and relied upon many different contracts for each filmed cast and crew member, including the choir, the band, the church location and the film’s director.

The documentation is thorough and intact.

It is equally clear that Warners and Ms. Franklin relied upon her personal service contract with Warner Films and Atlantic Records for her participation in the film.

the court ruling is too broad- the film was shown... is shown... and Elliott’s partnership with warner brothers

In addition, Warner Seven Arts and Atlantic relied upon Ms. Franklin's contract on at least two occasions to distribute the film in different iterations, including “American Masters: the Queen of Soul” which Ms. Franklin produced.

In addition, Ms. Franklin’s concerts from the Fillmore West are currently for sale at Wolfgang’s Vault at http://www.concertvault.com/aretha-franklin/video/respect_1203725099.html.

other docs:

<http://www.wxyz.com/news/region/detroit/aretha-franklins-documents-recordings-found-by-man-in-detroit-home>

options:

- 1) she could buy the film from me.
- 2) i would not release it while she is alive if she would like to negotiate that.
- 3) go to court

thank you.

-alan

phone: 323 988 9692

peace and love.

thank you.

-alan

phone: 323 988 9692

peace and love.

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Re: Amazing Grace
Date: February 27, 2015 at 11:39 AM
To: Todd W. Musburger todd@musburger.com



you ok with me responding to this (see belw
thank you.

-alan

phone: 323 988 9692

This email 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.

On Feb 27, 2015, at 11:22 AM, Stephen Carroll <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

Atlantic Film Wins a Medal

NEW YORK—The film “History of Atlantic Records” won a silver medal at the Atlanta International Film Festival, held last month. The medal was awarded for the documentary sales division in the festival’s entries.

Produced by Atlantic advertising and public relations chief Bob Rolontz, and filmed by California-based Braverman Productions, the film debuted at Atlantic’s 2th Anniversary Convention held in Paris last April. Since then, it has been screened in 12 foreign countries in

screened in 12 foreign countries, including Japan, England, Germany, Australia and Holland.

Most recently, the film was taken by the U.S. Information Agency for screenings in several South American countries. It is also being shown on educational film networks throughout the U.S.

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.

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
Cell: 914-589-2474
Fax: 847-953-2692

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Re: amazing grace/concord music group
Date: July 11, 2016 at 3:28 PM
To: Larry Blake Larry.Blake@concordmusicgroup.com, Stephen Carroll stephen.carroll@aon.com
Cc: Scott Pascucci scottpascucci@concordbicycle.com



yes.

stephen and i talked at 8:45pst this morning. stephen said he left you a vm.

perhaps you guys can set a time to talk?

thank you.

-alan

phone: 323 988 9692
peace and love.

<http://songsoundrecord.tumblr.com>

On Jul 11, 2016, at 3:15 PM, Larry Blake <Larry.Blake@concordmusicgroup.com> wrote:

Alan,

I never heard back from Stephen Carroll on this. I tried him again about a half hour ago, but got his voicemail again.

Did he respond to you?

Larry

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Friday, July 08, 2016 2:09 PM
To: Larry Blake <Larry.Blake@concordmusicgroup.com>; Scott Pascucci <scottpascucci@concordbicycle.com>
Subject: Fwd: amazing grace/concord music group

thank you.

-alan

phone: 323 988 9692
peace and love.

<http://songsoundrecord.tumblr.com>

Begin forwarded message:

From: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Subject: amazing grace/concord music group
Date: July 8, 2016 at 2:01:51 PM PDT
To: Stephen Carroll <stephen.carroll@aon.com>
Cc: "Todd W. Musburger" <todd@musburger.com>

hi stephen

you have on your voice mail a call from larry blake, svp/general counsel from concord music group.

PLEASE call him asap- he needs to hear from you that the policy does not exclude sydney pollack.

Larry Blake <Larry.Blake@concordmusicgroup.com> 310 385 4205

thank you.

-alan

phone: 323 988 9692
peace and love.

<http://songsoundrecord.tumblr.com>

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Fwd: amazing grace/concord music group
Date: July 8, 2016 at 4:38 PM
To: Todd W. Musburger todd@musburger.com



thank you.

-alan

phone: 323 988 9692
peace and love.

<http://songsoundrecord.tumblr.com>

Begin forwarded message:

From: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Subject: amazing grace/concord music group
Date: July 8, 2016 at 2:01:51 PM PDT
To: Stephen Carroll <stephen.carroll@aon.com>
Cc: "Todd W. Musburger" <todd@musburger.com>

hi stephen

you have on your voice mail a call from larry blake, svp/general counsel from concord music group.

PLEASE call him asap- he needs to hear from you that the policy does not exclude sydney pollack.

Larry Blake <Larry.Blake@concordmusicgroup.com> 310 385 4205

thank you.

-alan

phone: 323 988 9692
peace and love.

<http://songsoundrecord.tumblr.com>

From: alan elliott (ucla) alanelliott@g.ucla.edu

Subject: Fwd: Amazing Grace/Delivery Schedule

Date: November 6, 2015 at 4:42 PM

To: Stephen Carroll stephen.carroll@aon.com, Annette Shavuo annette.shavuo@aon.com

Cc: Tom McGuire tmcguire@wmeentertainment.com, Todd W. Musburger todd@musburger.com, Lincoln Bandlow lbandlow@foxrothschild.com



hey stephen

can you please ask the carrier re: "amazing grace" if, as suggested by hiscox's referral (lincoln bandlow), that in fact, if there is a settlement with aretha franklin and amazing grace llc, that producers errors and omissions coverage is in place that provides for a \$25,000 deductible and coverage of \$5m/\$5m for three years? Plus we need a quote because this policy has to be paid for 3 years as part of Delivery.

thank you.

-alan

phone: 323 988 9692

peace and love.

Tom McGuire | WME

TMcGuire@wmeentertainment.com

310.248.3022

From: Bandlow, Lincoln [<mailto:lbandlow@foxrothschild.com>]

Sent: Friday, November 06, 2015 3:38 PM

To: alan elliott (ucla); Tom McGuire

Cc: Todd W. Musburger

Subject: RE: Amazing Grace/Delivery Schedule

The carrier has said that there is no coverage for this dispute because information about prior disputes with Aretha were purportedly not disclosed to the carrier during the application process. I don't believe that the carrier is taking the position that all coverage is now null and void or if just coverage relating to any claim by Aretha is out. So that would have to be clarified with the carrier. I would lean to thinking they are just excluding Aretha claims.

From: alan elliott (ucla) alanelliott@g.ucla.edu

Subject: Fwd: Amazing Grace/Delivery Schedule

Date: November 6, 2015 at 3:44 PM

To: Stephen Carroll stephen.carroll@aon.com, Annette Shavuo annette.shavuo@aon.com

Cc: Tom McGuire tmcguire@wmeentertainment.com, Todd W. Musburger todd@musburger.com, Lincoln Bandlow lbandlow@foxrothschild.com



hey stephen

can you ask the carrier re: "amazing grace" if, as suggested by hiscox's referral (lincoln bandlow), that in fact, if there is a settlement with aretha franklin and amazing grace llc, that coverage is in place?

thank you.

-alan

phone: 323 988 9692

peace and love.

Tom McGuire | WME

TMcGuire@wmeentertainment.com

310.248.3022

From: Bandlow, Lincoln [<mailto:lbandlow@foxrothschild.com>]

Sent: Friday, November 06, 2015 3:38 PM

To: alan elliott (ucla); Tom McGuire

Cc: Todd W. Musburger

Subject: RE: Amazing Grace/Delivery Schedule

The carrier has said that there is no coverage for this dispute because information about prior disputes with Aretha were purportedly not disclosed to the carrier during the application process. I don't believe that the carrier is taking the position that all coverage is now null and void or if just coverage relating to any claim by Aretha is out. So that would have to be clarified with the carrier. I would lean to thinking they are just excluding Aretha claims.

From: Joe Boren Joe.Boren@ironshore.com
Subject: Re: Amazing Grace/Franklin
Date: February 12, 2016 at 3:01 PM
To: alan elliott (ucla) alanelliott@g.ucla.edu



I did not forget my Ca. Counsel(in house) is checking it out.

Sent from my iPhone

On Feb 11, 2016, at 4:13 PM, alan elliott (ucla) <alanelliott@g.ucla.edu> wrote:

hi joe

i have had no luck getting a lawyer as everyone (including tal) seems to have a conflict.

do you possibly have another referral for contingency?

thank you.

-alan

phone: 323 988 9692
peace and love.

<http://songsoundrecord.tumblr.com>

On Jan 23, 2016, at 11:09 AM, Joe Boren <Joe.Boren@ironshore.com> wrote:

Alan: It's a bit of a blizzard in New York, traffic is banned, the streets are quiet and I am reading e-mails. Were you able to touch base with Tal? Let me know, thanks.

Joe

On Jan 22, 2016, at 1:37 PM, "alan elliott (ucla)" <alanelliott@g.ucla.edu> wrote:

thank you joe.

I'll get back with you on progress.

thank you.

-alan

phone: [323 988 9692](tel:3239889692)
peace and love.

On Jan 22, 2016, at 10:35 AM, Joe Boren <Joe.Boren@ironshore.com> wrote:

My Friend Tal Finney, a Lawyer with Weintraub Tobin, is expecting your call. They have both an entertainment Practice and Insurance Practice. Explain it all to Tal, he will bring in whomever he deems appropriate. I told Tal, we were looking for great Free Advice, at least until you have a good understanding of your ability to be successful in litigation. Sometimes a threatening letter from a Law firm get's the trick done. By the way the coverage letter from Tara was not attached.

Alan, don't hesitate to contact me should you have difficulty hooking up with Tal or should you have further questions. Tal has gotten and still get's cases from my company. Tal can

be reached at 310-860-3330. His e-mail is tfinney@weintraub.com

Best
Joe

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Friday, January 22, 2016 12:18 PM
To: Joe Boren
Subject: Fwd: Amazing Grace/Franklin

thank you.

-alan

phone: [323 988 9692](tel:3239889692)
peace and love.

Begin forwarded message:

From: Bodden Tara <Tara.Bodden@HISCOX.com>
Date: September 16, 2015 at 2:28:33 PM PDT
To: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Cc: Richardson Joanne <Joanne.Richardson@Hiscox.com>, "stephen.carroll@aon.com" <stephen.carroll@aon.com>
Subject: **Amazing Grace/Franklin**

Hi Alan,

I hope all is well. Pursuant to my voicemail yesterday, attached please find our coverage correspondence regarding this matter.

Please give me a call with any questions.

Best,

Tara

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. No one else is authorised to distribute, forward, print, copy or act upon any information contained in this email. If you have received this email in error, please notify the sender.

Hiscox Syndicates Ltd and Hiscox Insurance Company Ltd are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority. Hiscox Underwriting Limited, Hiscox Europe Underwriting Limited and Hiscox A&M Limited are authorised and

Underwriting Limited, Hiscox Europe Underwriting Limited and Hiscox ASM Limited are authorised and regulated by the Financial Conduct Authority. Hiscox plc is a company registered in England and Wales under company registration number 2837811 and registered office at 1 Great St Helen's, London EC3A 6HX.

The information in this e-mail and in any attachments is confidential and may be privileged. If you are not the intended recipient, please destroy this communication and notify the sender immediately. You should not retain, copy or use this e-mail for any purpose, nor disclose all or any part of its contents to any other person or persons.

The information in this e-mail and in any attachments is confidential and may be privileged. If you are not the intended recipient, please destroy this communication and notify the sender immediately. You should not retain, copy or use this e-mail for any purpose, nor disclose all or any part of its contents to any other person or persons.

The information in this e-mail and in any attachments is confidential and may be privileged. If you are not the intended recipient, please destroy this communication and notify the sender immediately. You should not retain, copy or use this e-mail for any purpose, nor disclose all or any part of its contents to any other person or persons.

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Fwd: Amazing Grace/Franklin
Date: February 23, 2016 at 9:27 AM
To: bsleeth@reedsmith.com



hello boyd

i was referred to you by joe boren and tamara ashjian.

i had an insurance policy problem with hiscox which joe boren (and i) feel really has screwed me.

i am looking to try to rectify the situation or, if need be, take legal action as i had disclosed all the necessities to hiscox and their reps and attorneys (and they say as much in the letter attached), yet they are claiming i filled out the form incorrectly and so there are now exclusions.

please let me know if you have the time and energy to discuss further.



Amazing Grace
- Frank...OC.pdf

thank you.

-alan

phone: 323 988 9692
peace and love.

<http://songsoundrecord.tumblr.com>

Begin forwarded message:

From: Joe Boren <Joe.Boren@ironshore.com>
Subject: FW: Amazing Grace/Franklin
Date: February 18, 2016 at 7:45:31 AM PST
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>

From: Tamara Ashjian
Sent: Tuesday, February 16, 2016 2:00 PM
To: Joe Boren
Subject: RE: Amazing Grace/Franklin
Importance: High

Hi Joe,

I spoke with one of our trusted coverage attorneys, and they recommended the following as policy holder coverage attorneys:

Boyd Sleeth of Reed Smith

-He's in SF, but can probably recommend someone in So Cal if that is an issue. Here is his info:

http://www.reedsmith.com/boyd_sleeth/

I hope this helps. Let me know if you have any questions.

Tamara M. Ashjian
IRONSHORE Environmental
Vice President
Claims - West Coast
600 Wilshire Blvd., Suite 1600
Los Angeles, CA 90017
Office: 213.416.2319
Cell: 213.247.0922
Fax: 213.416.2301
tamara.ashjian@ironshore.com
www.ironshore.com

The information in this e-mail and in any attachments is confidential and may be privileged. If you are not the intended recipient, please destroy this communication and notify the sender immediately. You should not retain, copy or use this e-mail for any purpose, nor disclose all or any part of its contents to any other person or persons.

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Re: Amazing Grace/Franklin
Date: January 29, 2017 at 10:00 PM
To: Joe Boren Joe.Boren@ironshore.com



hi joe

long story short:

none of the referrals or referrals of referrals ever got beyond "we require a retainer" before getting going.

if you would please, can you ask again of your california office if they have someone?

i hope this finds you well.

thank you.

-alan

phone: [323 988 9692](tel:3239889692)
peace and love.

<http://songsoundrecord.tumblr.com>

On Feb 12, 2016, at 3:01 PM, Joe Boren <Joe.Boren@ironshore.com> wrote:

I did not forget my Ca. Counsel(in house) is checking it out.

Sent from my iPhone

On Feb 11, 2016, at 4:13 PM, alan elliott (ucla) <alanelliott@g.ucla.edu> wrote:

hi joe

i have had no luck getting a lawyer as everyone (including tal) seems to have a conflict.

do you possibly have another referral for contingency?

thank you.

-alan

phone: 323 988 9692
peace and love.

<http://songsoundrecord.tumblr.com>

On Jan 23, 2016, at 11:09 AM, Joe Boren <Joe.Boren@ironshore.com> wrote:

Alan: It's a bit of a blizzard in New York, traffic is banned, the streets are quiet and I am reading e-mails. Were you able to touch base with Tal? Let me know, thanks.

Joe

On Jan 22, 2016, at 1:37 PM, "alan elliott (ucla)" <alanelliott@g.ucla.edu> wrote:

thank you joe.

I'll get back with you on progress.

thank you.

-alan

phone: [323 988 9692](tel:3239889692)
peace and love.

On Jan 22, 2016, at 10:35 AM, Joe Boren <Joe.Boren@ironshore.com> wrote:

My Friend Tal Finney, a Lawyer with Weintraub Tobin, is expecting your call. They have both an entertainment Practice and Insurance Practice. Explain it all to Tal, he will bring in whomever he deems appropriate. I told Tal, we were looking for great Free Advice, at least until you have a good understanding of your ability to be successful in litigation. Sometimes a threatening letter from a Law firm get's the trick done. By the way the coverage letter from Tara was not attached.

Alan, don't hesitate to contact me should you have difficulty hooking up with Tal or should you have further questions. Tal has gotten and still get's cases from my company. Tal can be reached at 310-860-3330. His e-mail is tfinney@weintraub.com

Best
Joe

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Friday, January 22, 2016 12:18 PM
To: Joe Boren
Subject: Fwd: Amazing Grace/Franklin

thank you.

-alan

phone: [323 988 9692](tel:3239889692)
peace and love.

Begin forwarded message:

From: Bodden Tara <Tara.Bodden@HISCOX.com>
Date: September 16, 2015 at 2:28:33 PM PDT
To: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Cc: Richardson Joanne <Joanne.Richardson@Hiscox.com>, "stephen.carroll@aon.com" <stephen.carroll@aon.com>
Subject: Amazing Grace/Franklin

Hi Alan,

I hope all is well. Pursuant to my voicemail yesterday, attached please find our

I hope all is well. Pursuant to my voicemail yesterday, attached please find our coverage correspondence regarding this matter.

Please give me a call with any questions.

Best,

Tara

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. No one else is authorised to distribute, forward, print, copy or act upon any information contained in this email. If you have received this email in error, please notify the sender.

Hiscox Syndicates Ltd and Hiscox Insurance Company Ltd are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority. Hiscox Underwriting Limited, Hiscox Europe Underwriting Limited and Hiscox ASM Limited are authorised and regulated by the Financial Conduct Authority. Hiscox plc is a company registered in England and Wales under company registration number 2837811 and registered office at 1 Great St Helen's, London EC3A 6HX.

The information in this e-mail and in any attachments is confidential and may be privileged. If you are not the intended recipient, please destroy this communication and notify the sender immediately. You should not retain, copy or use this e-mail for any purpose, nor disclose all or any part of its contents to any other person or persons.

The information in this e-mail and in any attachments is confidential and may be privileged. If you are not the intended recipient, please destroy this communication and notify the sender immediately. You should not retain, copy or use this e-mail for any purpose, nor disclose all or any part of its contents to any other person or persons.

The information in this e-mail and in any attachments is confidential and may be privileged. If you are not the intended recipient, please destroy this communication and notify the sender immediately. You should not retain, copy or use this e-mail for any purpose, nor disclose all or any part of its contents to any other person or persons.

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Fwd: Amazing Grace/Franklin
Date: February 28, 2017 at 11:52 AM
To: Kenneth Freundlich ken@freundlichlaw.com



thank you.

-alan

phone: [323 988 9692](tel:3239889692)
peace and love.

<http://songsoundrecord.tumblr.com>

Begin forwarded message:

From: Bodden Tara <Tara.Bodden@HISCOX.com>
Date: September 16, 2015 at 2:28:33 PM PDT
To: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Cc: Richardson Joanne <Joanne.Richardson@Hiscox.com>, "stephen.carroll@aon.com" <stephen.carroll@aon.com>
Subject: Amazing Grace/Franklin

Hi Alan,

I hope all is well. Pursuant to my voicemail yesterday, attached please find our coverage correspondence regarding this matter.

Please give me a call with any questions.

Best,

Tara

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. No one else is authorised to distribute, forward, print, copy or act upon any information contained in this email. If you have received this email in error, please notify the sender.

Hiscox Syndicates Ltd and Hiscox Insurance Company Ltd are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority. Hiscox Underwriting Limited, Hiscox Europe Underwriting Limited and Hiscox ASM Limited are authorised and regulated by the Financial Conduct Authority. Hiscox plc is a company registered in England and Wales under company registration number 2837811 and registered office at 1 Great St Helen's, London EC3A 6HX.



Amazing Grace
- Frank...OC.pdf

From: alan elliott (ucla) alanelliott@g.ucla.edu 

Subject: Fwd: Amazing Grace/Franklin

Date: March 14, 2017 at 1:40 PM

To: Greg Bentley gbentley@bentleymore.com, Hannah Danucalov hdanucalov@bentleymore.com, Michael Bloch mbloch@bentleymore.com, Matthew Clark mclark@bentleymore.com, Evan Grant egrant@bentleymore.com



thank you.

-alan

phone: 323 988 9692

peace and love.

<http://songsoundrecord.tumblr.com>

Begin forwarded message:

From: Bodden Tara <Tara.Bodden@HISCOX.com>

Subject: Amazing Grace/Franklin

Date: September 16, 2015 at 2:28:33 PM PDT

To: "alan elliott (ucla)" <alanelliott@g.ucla.edu>

Cc: Richardson Joanne <Joanne.Richardson@Hiscox.com>, "stephen.carroll@aon.com" <stephen.carroll@aon.com>

Hi Alan,

I hope all is well. Pursuant to my voicemail yesterday, attached please find our coverage correspondence regarding this matter.

Please give me a call with any questions.

Best,

Tara

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. No one else is authorised to distribute, forward, print, copy or act upon any information contained in this email. If you have received this email in error, please notify the sender.

Hiscox Syndicates Ltd and Hiscox Insurance Company Ltd are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority. Hiscox Underwriting Limited, Hiscox Europe Underwriting Limited and Hiscox ASM Limited are authorised and regulated by the Financial Conduct Authority. Hiscox plc is a company registered in England and Wales under company registration number 2837811 and registered office at 1 Great St Helen's, London EC3A 6HX.



Amazing Grace
- Frank...OC.pdf

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Fwd: Amazing Grace/Franklin
Date: March 14, 2017 at 4:04 PM
To: paul@shernoff.com



thank you.

-alan

phone: 323 988 9692
peace and love.

<http://songsoundrecord.tumblr.com>

Begin forwarded message:

From: Bodden Tara <Tara.Bodden@HISCOX.com>
Subject: Amazing Grace/Franklin
Date: September 16, 2015 at 2:28:33 PM PDT
To: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Cc: Richardson Joanne <Joanne.Richardson@Hiscox.com>, "stephen.carroll@aon.com" <stephen.carroll@aon.com>

Hi Alan,

I hope all is well. Pursuant to my voicemail yesterday, attached please find our coverage correspondence regarding this matter.

Please give me a call with any questions.

Best,

Tara

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. No one else is authorised to distribute, forward, print, copy or act upon any information contained in this email. If you have received this email in error, please notify the sender.

Hiscox Syndicates Ltd and Hiscox Insurance Company Ltd are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority. Hiscox Underwriting Limited, Hiscox Europe Underwriting Limited and Hiscox ASM Limited are authorised and regulated by the Financial Conduct Authority. Hiscox plc is a company registered in England and Wales under company registration number 2837811 and registered office at 1 Great St Helen's, London EC3A 6HX.



Amazing Grace
- Frank...OC.pdf

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Fwd: Amazing Grace/Franklin
Date: April 24, 2017 at 4:15 PM
To: Lew Loss lloss@ljwllp.com



thank you.

-alan

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

peace and love.

Begin forwarded message:

From: Bodden Tara <Tara.Bodden@HISCOX.com>
Date: September 16, 2015 at 2:28:33 PM PDT
To: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Cc: Richardson Joanne <Joanne.Richardson@Hiscox.com>, "stephen.carroll@aon.com" <stephen.carroll@aon.com>
Subject: Amazing Grace/Franklin

Hi Alan,

I hope all is well. Pursuant to my voicemail yesterday, attached please find our coverage correspondence regarding this matter.

Please give me a call with any questions.

Best,

Tara

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. No one else is authorised to distribute, forward, print, copy or act upon any information contained in this email. If you have received this email in error, please notify the sender.

Hiscox Syndicates Ltd and Hiscox Insurance Company Ltd are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority. Hiscox Underwriting Limited, Hiscox Europe Underwriting Limited and Hiscox ASM Limited are authorised and regulated by the Financial Conduct Authority. Hiscox plc is a company registered in England and Wales under company registration number 2837811 and registered office at 1 Great St Helen's, London EC3A 6HX.



Amazing Grace
- Frank...OC.pdf

From: Lew Loss lloss@ljwllp.com
Subject: Fwd: Amazing Grace/Franklin
Date: April 26, 2017 at 3:30 PM
To: alan elliott (ucla) alanelliott@g.ucla.edu



Begin forwarded message:

From: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Date: April 24, 2017 at 4:15:35 PM PDT
To: Lew Loss <lloss@ljwllp.com>
Subject: Fwd: Amazing Grace/Franklin

thank you.

-alan

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

peace and love.

Begin forwarded message:

From: Bodden Tara <Tara.Bodden@HISCOX.com>
Date: September 16, 2015 at 2:28:33 PM PDT
To: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Cc: Richardson Joanne <Joanne.Richardson@Hiscox.com>, "stephen.carroll@aon.com" <stephen.carroll@aon.com>
Subject: Amazing Grace/Franklin

Hi Alan,

I hope all is well. Pursuant to my voicemail yesterday, attached please find our coverage correspondence regarding this matter.

Please give me a call with any questions.

Best,

Tara

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. No one else is authorised to distribute, forward, print, copy or act upon any information contained in this email. If you have received this email in error, please notify the sender.

Hiscox Syndicates Ltd and Hiscox Insurance Company Ltd are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority. Hiscox Underwriting Limited, Hiscox Europe Underwriting Limited and Hiscox ASM Limited are authorised and regulated by the Financial Conduct Authority. Hiscox plc is a company registered in England and Wales under company registration number 2837811 and registered office at 1 Great St Helen's, London EC3A 6HX.

Please consider the environment before printing this e-mail.

This communication, including attachments, is confidential, may be subject to legal privileges, and is intended for the sole use of the addressee. Any use, duplication, disclosure, or dissemination of this communication, other than by the addressee, is prohibited. If you have received this communication in error, please notify the sender immediately and delete or destroy this communication and all copies.



Amazing Grace
- Frank...OC.pdf

From: alan elliott Alan@AlanElliott.net 
Subject: Fwd: Amazing Grace/Franklin
Date: June 14, 2018 at 2:15 PM
To: tal finney tfinney@weintraub.com



hi tal

i believe we talked a while back about my "amazing grace" film. (joe boren had sent me your way.)

i have an issue with chubb insurance and i wanted to see if you might be able to help or if perhaps you might have a referral. please let me know.

thank you.

-alan

phone: 323 988 9692

peace and love.



Begin forwarded message:

From: Joe Boren <Joe.Boren@ironshore.com>
Subject: RE: Amazing Grace/Franklin
Date: January 22, 2016 at 10:35:02 AM PST
To: "alan elliott (ucla)" <alanelliott@g.ucla.edu>

My Friend Tal Finney, a Lawyer with Weintraub Tobin, is expecting your call. They have both an entertainment Practice and Insurance Practice. Explain it all to Tal, he will bring in whomever he deems appropriate. I told Tal, we were looking for great Free Advice, at least until you have a good understanding of your ability to be successful in litigation. Sometimes a threatening letter from a Law firm get's the trick done. By the way the coverage letter from Tara was not attached.

Alan, don't hesitate to contact me should you have difficulty hooking up with Tal or should you have further questions. Tal has gotten and still get's cases from my company. Tal can be reached at 310-860-3330. His e-mail is tfinney@weintraub.com

Best
Joe

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Friday, January 22, 2016 12:18 PM
To: Joe Boren
Subject: Fwd: Amazing Grace/Franklin

thank you.

-alan

phone: [323 988 9692](tel:3239889692)
peace and love.

Begin forwarded message:

From: Bodden Tara <Tara.Bodden@HISCOX.com>
Date: September 16, 2015 at 2:28:33 PM PDT
To: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Cc: Richardson Joanne <Joanne.Richardson@Hiscox.com>, "stephen.carroll@aon.com" <stephen.carroll@aon.com>
Subject: Amazing Grace/Franklin

Hi Alan,

I hope all is well. Pursuant to my voicemail yesterday, attached please find our coverage correspondence regarding this matter.

Please give me a call with any questions.

Best,

Tara

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. No one else is authorised to distribute, forward, print, copy or act upon any information contained in this email. If you have received this email in error, please notify the sender.

Hiscox Syndicates Ltd and Hiscox Insurance Company Ltd are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority. Hiscox Underwriting Limited, Hiscox Europe Underwriting Limited and Hiscox ASM Limited are authorised and regulated by the Financial Conduct Authority. Hiscox plc is a company registered in England and Wales under company registration number 2837811 and registered office at 1 Great St Helen's, London EC3A 6HX.

The information in this e-mail and in any attachments is confidential and may be privileged. If you are not the intended recipient, please destroy this communication and notify the sender immediately. You should not retain, copy or use this e-mail for any purpose, nor disclose all or any part of its contents to any other person or persons.

From: alan elliott Alan@AlanElliott.net 
Subject: Fwd: Amazing Grace/Franklin
Date: June 14, 2018 at 2:21 PM
To: tfinney@lflawyers.com



hi tal

we talked a while back about my "amazing grace" film. (joe boren sent me your way.)

i have an issue with chubb insurance and i wanted to see if you might be able to help or if perhaps you might have a referral... or some thoughts. please let me know.

thank you.

-alan

phone: 323 988 9692

peace and love.



Begin forwarded message:

From: Joe Boren <Joe.Boren@ironshore.com>
Subject: RE: Amazing Grace/Franklin
Date: January 22, 2016 at 10:35:02 AM PST
To: "alan elliott (ucla)" <alanelliott@g.ucla.edu>

My Friend Tal Finney, a Lawyer with Weintraub Tobin, is expecting your call. They have both an entertainment Practice and Insurance Practice. Explain it all to Tal, he will bring in whomever he deems appropriate. I told Tal, we were looking for great Free Advice, at least until you have a good understanding of your ability to be successful in litigation. Sometimes a threatening letter from a Law firm get's the trick done. By the way the coverage letter from Tara was not attached.

Alan, don't hesitate to contact me should you have difficulty hooking up with Tal or should you have further questions. Tal has gotten and still get's cases from my company. Tal can be reached at 310-860-3330. His e-mail is tfinney@weintraub.com

Best
Joe

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Friday, January 22, 2016 12:18 PM
To: Joe Boren
Subject: Fwd: Amazing Grace/Franklin

thank you.

-alan

phone: [323 988 9692](tel:3239889692)
peace and love.

Begin forwarded message:

From: Bodden Tara <Tara.Bodden@HISCOX.com>
Date: September 16, 2015 at 2:28:33 PM PDT
To: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Cc: Richardson Joanne <Joanne.Richardson@Hiscox.com>, "stephen.carroll@aon.com" <stephen.carroll@aon.com>
Subject: Amazing Grace/Franklin

Hi Alan,

I hope all is well. Pursuant to my voicemail yesterday, attached please find our coverage correspondence regarding this matter.

Please give me a call with any questions.

Best,

Tara

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. No one else is authorised to distribute, forward, print, copy or act upon any information contained in this email. If you have received this email in error, please notify the sender.

Hiscox Syndicates Ltd and Hiscox Insurance Company Ltd are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority. Hiscox Underwriting Limited, Hiscox Europe Underwriting Limited and Hiscox ASM Limited are authorised and regulated by the Financial Conduct Authority. Hiscox plc is a company registered in England and Wales under company registration number 2837811 and registered office at 1 Great St Helen's, London EC3A 6HX.

The information in this e-mail and in any attachments is confidential and may be privileged. If you are not the intended recipient, please destroy this communication and notify the sender immediately. You should not retain, copy or use this e-mail for any purpose, nor disclose all or any part of its contents to any other person or persons.

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Fwd: Amazing Grace/Franklin
Date: January 22, 2016 at 9:18 AM
To: joe.boren@ironshore.com



thank you.

-alan

phone: [323 988 9692](tel:3239889692)
peace and love.

Begin forwarded message:

From: Bodden Tara <Tara.Bodden@HISCOX.com>
Date: September 16, 2015 at 2:28:33 PM PDT
To: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Cc: Richardson Joanne <Joanne.Richardson@Hiscox.com>, "stephen.carroll@aon.com" <stephen.carroll@aon.com>
Subject: Amazing Grace/Franklin

Hi Alan,

I hope all is well. Pursuant to my voicemail yesterday, attached please find our coverage correspondence regarding this matter.

Please give me a call with any questions.

Best,

Tara

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. No one else is authorised to distribute, forward, print, copy or act upon any information contained in this email. If you have received this email in error, please notify the sender.

Hiscox Syndicates Ltd and Hiscox Insurance Company Ltd are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority. Hiscox Underwriting Limited, Hiscox Europe Underwriting Limited and Hiscox ASM Limited are authorised and regulated by the Financial Conduct Authority. Hiscox plc is a company registered in England and Wales under company registration number 2837811 and registered office at 1 Great St Helen's, London EC3A 6HX.

From: Joe Boren Joe.Boren@ironshore.com
Subject: RE: Amazing Grace/Franklin
Date: January 22, 2016 at 10:35 AM
To: alan elliott (ucla) alanelliott@g.ucla.edu

JB

My Friend Tal Finney, a Lawyer with Weintraub Tobin, is expecting your call. They have both an entertainment Practice and Insurance Practice. Explain it all to Tal, he will bring in whomever he deems appropriate. I told Tal, we were looking for great Free Advice, at least until you have a good understanding of your ability to be successful in litigation. Sometimes a threatening letter from a Law firm get's the trick done. By the way the coverage letter from Tara was not attached.

Alan, don't hesitate to contact me should you have difficulty hooking up with Tal or should you have further questions. Tal has gotten and still get's cases from my company. Tal can be reached at 310-860-3330. His e-mail is tfinney@weintraub.com

Best
Joe

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Friday, January 22, 2016 12:18 PM
To: Joe Boren
Subject: Fwd: Amazing Grace/Franklin

thank you.

-alan

phone: [323 988 9692](tel:3239889692)
peace and love.

Begin forwarded message:

From: Bodden Tara <Tara.Bodden@HISCOX.com>
Date: September 16, 2015 at 2:28:33 PM PDT
To: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Cc: Richardson Joanne <Joanne.Richardson@Hiscox.com>, "stephen.carroll@aon.com" <stephen.carroll@aon.com>
Subject: Amazing Grace/Franklin

Hi Alan,

I hope all is well. Pursuant to my voicemail yesterday, attached please find our coverage correspondence regarding this matter.

Please give me a call with any questions.

Best,

Tara

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. No one else is authorised to distribute, forward, print, copy or act upon any information contained in this email. If you have received this email in error, please notify the sender.

Hiscox Syndicates Ltd and Hiscox Insurance Company Ltd are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority. Hiscox Underwriting Limited, Hiscox Europe Underwriting Limited and Hiscox ASM Limited are authorised and regulated by the Financial Conduct Authority. Hiscox plc is a company registered in England and Wales under company registration number 2837811 and registered office at 1 Great St Helen's, London EC3A 6HX.

The information in this e-mail and in any attachments is confidential and may be privileged. If you are not the intended recipient, please destroy this communication and notify the sender immediately. You should not retain, copy or use this e-mail for any purpose, nor disclose all or any part of its contents to any other person or persons.

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Re: Amazing Grace/Franklin
Date: January 22, 2016 at 10:37 AM
To: Joe Boren Joe.Boren@ironshore.com



thank you joe.

I'll get back with you on progress.

thank you.

-alan

phone: [323 988 9692](tel:3239889692)
peace and love.

On Jan 22, 2016, at 10:35 AM, Joe Boren <Joe.Boren@ironshore.com> wrote:

My Friend Tal Finney, a Lawyer with Weintraub Tobin, is expecting your call. They have both an entertainment Practice and Insurance Practice. Explain it all to Tal, he will bring in whomever he deems appropriate. I told Tal, we were looking for great Free Advice, at least until you have a good understanding of your ability to be successful in litigation. Sometimes a threatening letter from a Law firm get's the trick done. By the way the coverage letter from Tara was not attached.

Alan, don't hesitate to contact me should you have difficulty hooking up with Tal or should you have further questions. Tal has gotten and still get's cases from my company. Tal can be reached at 310-860-3330. His e-mail is tfinney@weintraub.com

Best
Joe

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Friday, January 22, 2016 12:18 PM
To: Joe Boren
Subject: Fwd: Amazing Grace/Franklin

thank you.

-alan

phone: [323 988 9692](tel:3239889692)
peace and love.

Begin forwarded message:

From: Bodden Tara <Tara.Bodden@HISCOX.com>
Date: September 16, 2015 at 2:28:33 PM PDT

To: "'alan elliott (ucla)'" <alanelliott@g.ucla.edu>
Cc: Richardson Joanne <Joanne.Richardson@Hiscox.com>, "'stephen.carroll@aon.com'" <stephen.carroll@aon.com>
Subject: **Amazing Grace/Franklin**

Hi Alan,

I hope all is well. Pursuant to my voicemail yesterday, attached please find our coverage correspondence regarding this matter.

Please give me a call with any questions.

Best,

Tara

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. No one else is authorised to distribute, forward, print, copy or act upon any information contained in this email. If you have received this email in error, please notify the sender.

Hiscox Syndicates Ltd and Hiscox Insurance Company Ltd are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority. Hiscox Underwriting Limited, Hiscox Europe Underwriting Limited and Hiscox ASM Limited are authorised and regulated by the Financial Conduct Authority. Hiscox plc is a company registered in England and Wales under company registration number 2837811 and registered office at 1 Great St Helen's, London EC3A 6HX.

The information in this e-mail and in any attachments is confidential and may be privileged. If you are not the intended recipient, please destroy this communication and notify the sender immediately. You should not retain, copy or use this e-mail for any purpose, nor disclose all or any part of its contents to any other person or persons.

From: Joe Boren Joe.Boren@ironshore.com
Subject: Re: Amazing Grace/Franklin
Date: January 23, 2016 at 11:09 AM
To: alan elliott (ucla) alanelliott@g.ucla.edu



Alan: It's a bit of a blizzard in New York, traffic is banned, the streets are quiet and I am reading e-mails. Were you able to touch base with Tal? Let me know, thanks.

Joe

On Jan 22, 2016, at 1:37 PM, "alan elliott (ucla)" <alanelliott@g.ucla.edu> wrote:

thank you joe.

I'll get back with you on progress.

thank you.

-alan

phone: [323 988 9692](tel:3239889692)
peace and love.

On Jan 22, 2016, at 10:35 AM, Joe Boren <Joe.Boren@ironshore.com> wrote:

My Friend Tal Finney, a Lawyer with Weintraub Tobin, is expecting your call. They have both an entertainment Practice and Insurance Practice. Explain it all to Tal, he will bring in whomever he deems appropriate. I told Tal, we were looking for great Free Advice, at least until you have a good understanding of your ability to be successful in litigation. Sometimes a threatening letter from a Law firm get's the trick done. By the way the coverage letter from Tara was not attached.

Alan, don't hesitate to contact me should you have difficulty hooking up with Tal or should you have further questions. Tal has gotten and still get's cases from my company. Tal can be reached at 310-860-3330. His e-mail is tfiney@weintraub.com

Best
Joe

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Friday, January 22, 2016 12:18 PM
To: Joe Boren
Subject: Fwd: Amazing Grace/Franklin

thank you.

-alan

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

peace and love.

Begin forwarded message:

From: Bodden Tara <Tara.Bodden@HISCOX.com>
Date: September 16, 2015 at 2:28:33 PM PDT
To: "'alan elliott (ucla)'" <alanelliott@g.ucla.edu>
Cc: Richardson Joanne <Joanne.Richardson@Hiscox.com>, "'stephen.carroll@aon.com'" <stephen.carroll@aon.com>
Subject: Amazing Grace/Franklin

Hi Alan,

I hope all is well. Pursuant to my voicemail yesterday, attached please find our coverage correspondence regarding this matter.

Please give me a call with any questions.

Best,

Tara

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. No one else is authorised to distribute, forward, print, copy or act upon any information contained in this email. If you have received this email in error, please notify the sender.

Hiscox Syndicates Ltd and Hiscox Insurance Company Ltd are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority. Hiscox Underwriting Limited, Hiscox Europe Underwriting Limited and Hiscox ASM Limited are authorised and regulated by the Financial Conduct Authority. Hiscox plc is a company registered in England and Wales under company registration number 2837811 and registered office at 1 Great St Helen's, London EC3A 6HX.

The information in this e-mail and in any attachments is confidential and may be privileged. If you are not the intended recipient, please destroy this communication and notify the sender immediately. You should not retain, copy or use this e-mail for any purpose, nor disclose all or any part of its contents to any other person or persons.

The information in this e-mail and in any attachments is confidential and may be privileged. If you are not the intended recipient, please destroy this communication and notify the sender immediately. You should not retain, copy or use this e-mail for any purpose, nor disclose all or any part of its contents to any other person or persons.

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Re: Amazing Grace/Franklin
Date: January 23, 2016 at 11:13 AM
To: Joe Boren Joe.Boren@ironshore.com



yes. his firm as a conflict with insurer but I told him to see if hiscox would give a waiver.

thank you.

-alan

phone: [323 988 9692](tel:3239889692)
peace and love.

On Jan 23, 2016, at 11:09 AM, Joe Boren <Joe.Boren@ironshore.com> wrote:

Alan: It's a bit of a blizzard in New York, traffic is banned, the streets are quiet and I am reading e-mails. Were you able to touch base with Tal? Let me know, thanks.

Joe

On Jan 22, 2016, at 1:37 PM, "alan elliott (ucla)" <alanelliott@g.ucla.edu> wrote:

thank you joe.

I'll get back with you on progress.

thank you.

-alan

phone: [323 988 9692](tel:3239889692)
peace and love.

On Jan 22, 2016, at 10:35 AM, Joe Boren <Joe.Boren@ironshore.com> wrote:

My Friend Tal Finney, a Lawyer with Weintraub Tobin, is expecting your call. They have both an entertainment Practice and Insurance Practice. Explain it all to Tal, he will bring in whomever he deems appropriate. I told Tal, we were looking for great Free Advice, at least until you have a good understanding of your ability to be successful in litigation. Sometimes a threatening letter from a Law firm get's the trick done. By the way the coverage letter from Tara was not attached.

Alan, don't hesitate to contact me should you have difficulty hooking up with Tal or should you have further questions. Tal has gotten and still get's cases from my company. Tal can be reached at 310-860-3330. His e-mail is tfinney@weintraub.com

Best
Joe

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Friday, January 22, 2016 12:18 PM
To: Joe Boren
Subject: Fwd: Amazing Grace/Franklin

thank you.

-alan

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

peace and love.

Begin forwarded message:

From: Bodden Tara <Tara.Bodden@HISCOX.com>
Date: September 16, 2015 at 2:28:33 PM PDT
To: "'alan elliott (ucla)'" <alanelliott@g.ucla.edu>
Cc: Richardson Joanne <Joanne.Richardson@Hiscox.com>, "'stephen.carroll@aon.com'" <stephen.carroll@aon.com>
Subject: **Amazing Grace/Franklin**

Hi Alan,

I hope all is well. Pursuant to my voicemail yesterday, attached please find our coverage correspondence regarding this matter.

Please give me a call with any questions.

Best,

Tara

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. No one else is authorised to distribute, forward, print, copy or act upon any information contained in this email. If you have received this email in error, please notify the sender.

Hiscox Syndicates Ltd and Hiscox Insurance Company Ltd are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority. Hiscox Underwriting Limited, Hiscox Europe Underwriting Limited and Hiscox ASM Limited are authorised and regulated by the Financial Conduct Authority. Hiscox plc is a company registered in England and Wales under company registration number 2837811 and registered office at 1 Great St Helen's, London EC3A 6HX.

The information in this e-mail and in any attachments is confidential and may be privileged. If you are not the intended recipient, please destroy this communication and notify the sender immediately. You should not retain, copy or use this e-mail for any purpose, nor disclose all or any part of its contents to any other person or persons.

The information in this e-mail and in any attachments is confidential and may be privileged. If you are not the intended recipient, please destroy this communication and notify the sender immediately. You should not retain, copy or use this e-mail for any purpose, nor disclose all or any part of its contents to any other person or persons.

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Re: Amazing Grace/Franklin
Date: February 11, 2016 at 4:13 PM
To: joe boren Joe.Boren@ironshore.com



hi joe

i have had no luck getting a lawyer as everyone (including tal) seems to have a conflict.

do you possibly have another referral for contingency?

thank you.

-alan

phone: 323 988 9692
peace and love.

<http://songsoundrecord.tumblr.com>

On Jan 23, 2016, at 11:09 AM, Joe Boren <Joe.Boren@ironshore.com> wrote:

Alan: It's a bit of a blizzard in New York, traffic is banned, the streets are quiet and I am reading e-mails. Were you able to touch base with Tal? Let me know, thanks.

Joe

On Jan 22, 2016, at 1:37 PM, "alan elliott (ucla)" <alanelliott@g.ucla.edu> wrote:

thank you joe.

I'll get back with you on progress.

thank you.

-alan

phone: [323 988 9692](tel:3239889692)
peace and love.

On Jan 22, 2016, at 10:35 AM, Joe Boren <Joe.Boren@ironshore.com> wrote:

My Friend Tal Finney, a Lawyer with Weintraub Tobin, is expecting your call. They have both an entertainment Practice and Insurance Practice. Explain it all to Tal, he will bring in whomever he deems appropriate. I told Tal, we were looking for great Free Advice, at least until you have a good understanding of your ability to be successful in litigation. Sometimes a threatening letter from a Law firm get's the trick done. By the way the coverage letter from Tara was not attached.

Alan, don't hesitate to contact me should you have difficulty hooking up with Tal or should you have further questions. Tal has gotten and still get's cases from my company. Tal can be reached at 310-860-3330. His e-mail is tfinney@weintraub.com

Post

Best

Joe

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Friday, January 22, 2016 12:18 PM
To: Joe Boren
Subject: Fwd: Amazing Grace/Franklin

thank you.

-alan

phone: [323 988 9692](tel:3239889692)
peace and love.

Begin forwarded message:

From: Bodden Tara <Tara.Bodden@HISCOX.com>
Date: September 16, 2015 at 2:28:33 PM PDT
To: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Cc: Richardson Joanne <Joanne.Richardson@Hiscox.com>, "stephen.carroll@aon.com" <stephen.carroll@aon.com>
Subject: Amazing Grace/Franklin

Hi Alan,

I hope all is well. Pursuant to my voicemail yesterday, attached please find our coverage correspondence regarding this matter.

Please give me a call with any questions.

Best,

Tara

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. No one else is authorised to distribute, forward, print, copy or act upon any information contained in this email. If you have received this email in error, please notify the sender.

Hiscox Syndicates Ltd and Hiscox Insurance Company Ltd are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority. Hiscox Underwriting Limited, Hiscox Europe Underwriting Limited and Hiscox ASM Limited are authorised and regulated by the Financial Conduct Authority. Hiscox plc is a company registered in England and Wales under company registration number 2837811 and registered office at 1 Great St Helen's, London EC3A 6HX.

The information in this e-mail and in any attachments is confidential and may be privileged. If you are not the intended recipient, please destroy this communication and notify the sender immediately. You should

not retain, copy or use this e-mail for any purpose, nor disclose all or any part of its contents to any other person or persons.

The information in this e-mail and in any attachments is confidential and may be privileged. If you are not the intended recipient, please destroy this communication and notify the sender immediately. You should not retain, copy or use this e-mail for any purpose, nor disclose all or any part of its contents to any other person or persons.

From: Joe Boren Joe.Boren@ironshore.com
Subject: Re: Amazing Grace/Franklin
Date: February 11, 2016 at 5:11 PM
To: alan elliott (ucla) alanelliott@g.ucla.edu



Alan, I will talk with the person who manages our LA business tonight or in the morning and will get back to you.

Sent from my iPhone

On Feb 11, 2016, at 4:13 PM, alan elliott (ucla) <alanelliott@g.ucla.edu> wrote:

hi joe

i have had no luck getting a lawyer as everyone (including tal) seems to have a conflict.

do you possibly have another referral for contingency?

thank you.

-alan

phone: 323 988 9692
peace and love.

<http://songsoundrecord.tumblr.com>

On Jan 23, 2016, at 11:09 AM, Joe Boren <Joe.Boren@ironshore.com> wrote:

Alan: It's a bit of a blizzard in New York, traffic is banned, the streets are quiet and I am reading e-mails. Were you able to touch base with Tal? Let me know, thanks.

Joe

On Jan 22, 2016, at 1:37 PM, "alan elliott (ucla)" <alanelliott@g.ucla.edu> wrote:

thank you joe.

I'll get back with you on progress.

thank you.

-alan

phone: [323 988 9692](tel:3239889692)
peace and love.

On Jan 22, 2016, at 10:35 AM, Joe Boren <Joe.Boren@ironshore.com> wrote:

My Friend Tal Finney, a Lawyer with Weintraub Tobin, is expecting your call. They have both an entertainment Practice and Insurance Practice. Explain it all to Tal, he will bring in whomever he deems appropriate. I told Tal, we were looking for great Free Advice, at least until you have a good understanding of your ability to be successful in litigation. Sometimes a threatening letter from a Law firm get's the trick done. By the way the coverage letter from Tara was not attached.

Alan, don't hesitate to contact me should you have difficulty hooking up with Tal or should you have further questions. Tal has gotten and still get's cases from my company. Tal can

be reached at 310-860-3330. His e-mail is tfinney@weintraub.com

Best
Joe

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Friday, January 22, 2016 12:18 PM
To: Joe Boren
Subject: Fwd: Amazing Grace/Franklin

thank you.

-alan

phone: [323 988 9692](tel:3239889692)
peace and love.

Begin forwarded message:

From: Bodden Tara <Tara.Bodden@HISCOX.com>
Date: September 16, 2015 at 2:28:33 PM PDT
To: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Cc: Richardson Joanne <Joanne.Richardson@Hiscox.com>, "stephen.carroll@aon.com" <stephen.carroll@aon.com>
Subject: **Amazing Grace/Franklin**

Hi Alan,

I hope all is well. Pursuant to my voicemail yesterday, attached please find our coverage correspondence regarding this matter.

Please give me a call with any questions.

Best,

Tara

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. No one else is authorised to distribute, forward, print, copy or act upon any information contained in this email. If you have received this email in error, please notify the sender.

Hiscox Syndicates Ltd and Hiscox Insurance Company Ltd are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority. Hiscox Underwriting Limited, Hiscox Europe Underwriting Limited and Hiscox A&M Limited are authorised and

Underwriting Limited, Hiscox Europe Underwriting Limited and Hiscox ASM Limited are authorised and regulated by the Financial Conduct Authority. Hiscox plc is a company registered in England and Wales under company registration number 2837811 and registered office at 1 Great St Helen's, London EC3A 6HX.

The information in this e-mail and in any attachments is confidential and may be privileged. If you are not the intended recipient, please destroy this communication and notify the sender immediately. You should not retain, copy or use this e-mail for any purpose, nor disclose all or any part of its contents to any other person or persons.

The information in this e-mail and in any attachments is confidential and may be privileged. If you are not the intended recipient, please destroy this communication and notify the sender immediately. You should not retain, copy or use this e-mail for any purpose, nor disclose all or any part of its contents to any other person or persons.

The information in this e-mail and in any attachments is confidential and may be privileged. If you are not the intended recipient, please destroy this communication and notify the sender immediately. You should not retain, copy or use this e-mail for any purpose, nor disclose all or any part of its contents to any other person or persons.

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Re: Amazing Grace/Franklin
Date: February 12, 2016 at 8:20 AM
To: joe boren Joe.Boren@ironshore.com



terrific.

thank you.

-alan

phone: 323 988 9692
peace and love.

<http://songsoundrecord.tumblr.com>

On Feb 11, 2016, at 5:11 PM, Joe Boren <Joe.Boren@ironshore.com> wrote:

Alan, I will talk with the person who manages our LA business tonight or in the morning and will get back to you.

Sent from my iPhone

On Feb 11, 2016, at 4:13 PM, alan elliott (ucla) <alanelliott@g.ucla.edu> wrote:

hi joe

i have had no luck getting a lawyer as everyone (including tal) seems to have a conflict.

do you possibly have another referral for contingency?

thank you.

-alan

phone: 323 988 9692
peace and love.

<http://songsoundrecord.tumblr.com>

On Jan 23, 2016, at 11:09 AM, Joe Boren <Joe.Boren@ironshore.com> wrote:

Alan: It's a bit of a blizzard in New York, traffic is banned, the streets are quiet and I am reading e-mails. Were you able to touch base with D? Let me know, thanks.

Joe

On Jan 22, 2016, at 1:37 PM, "alan elliott (ucla)" <alanelliott@g.ucla.edu> wrote:

thank you joe.

I'll get back with you on progress.

thank you.

-alan

phone: [323 988 9692](tel:3239889692)
peace and love.

On Jan 22, 2016, at 10:35 AM, Joe Boren <Joe.Boren@ironshore.com> wrote:

My Friend Tal Finney, a Lawyer with Weintraub Tobin, is expecting your call. They have both an entertainment Practice and Insurance Practice. Explain it all to Tal, he will bring in whomever he deems appropriate. I told Tal, we were looking for great Free Advice, at least until you have a good understanding of your ability to be successful in litigation. Sometimes a threatening letter from a Law firm get's the trick done. By the way the coverage letter from Tara was not attached.

Alan, don't hesitate to contact me should you have difficulty hooking up with Tal or should you have further questions. Tal has gotten and still get's cases from my company. Tal can be reached at 310-860-3330. His e-mail is tfinney@weintraub.com

Best
Joe

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Friday, January 22, 2016 12:18 PM
To: Joe Boren
Subject: Fwd: Amazing Grace/Franklin

thank you.

-alan

phone: [323 988 9692](tel:3239889692)
peace and love.

Begin forwarded message:

From: Bodden Tara <Tara.Bodden@HISCOX.com>
Date: September 16, 2015 at 2:28:33 PM PDT
To: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Cc: Richardson Joanne <Joanne.Richardson@Hiscox.com>, "stephen.carroll@aon.com" <stephen.carroll@aon.com>
Subject: Amazing Grace/Franklin

Hi Alan,

I hope all is well. Pursuant to my voicemail yesterday, attached please find our coverage correspondence regarding this matter.

Please give me a call with any questions.

Best,

Tara

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. No one else is authorised to distribute, forward, print, copy or act upon any information contained in this email. If you have received this email in error, please notify the sender.

Hiscox Syndicates Ltd and Hiscox Insurance Company Ltd are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority. Hiscox Underwriting Limited, Hiscox Europe Underwriting Limited and Hiscox ASM Limited are authorised and regulated by the Financial Conduct Authority. Hiscox plc is a company registered in England and Wales under company registration number 2837811 and registered office at 1 Great St Helen's, London EC3A 6HX.

The information in this e-mail and in any attachments is confidential and may be privileged. If you are not the intended recipient, please destroy this communication and notify the sender immediately. You should not retain, copy or use this e-mail for any purpose, nor disclose all or any part of its contents to any other person or persons.

The information in this e-mail and in any attachments is confidential and may be privileged. If you are not the intended recipient, please destroy this communication and notify the sender immediately. You should not retain, copy or use this e-mail for any purpose, nor disclose all or any part of its contents to any other person or persons.

The information in this e-mail and in any attachments is confidential and may be privileged. If you are not the intended recipient, please destroy this communication and notify the sender immediately. You should not retain, copy or use this e-mail for any purpose, nor disclose all or any part of its contents to any other person or persons.

From: Bodden Tara Tara.Bodden@HISCOX.com 
Subject: Amazing Grace/Franklin
Date: September 16, 2015 at 2:28 PM
To: alan elliott (ucla) alanelliott@g.ucla.edu
Cc: Richardson Joanne Joanne.Richardson@Hiscox.com, stephen.carroll@aon.com

BT

Hi Alan,

I hope all is well. Pursuant to my voicemail yesterday, attached please find our coverage correspondence regarding this matter.

Please give me a call with any questions.

Best,

Tara

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. No one else is authorised to distribute, forward, print, copy or act upon any information contained in this email. If you have received this email in error, please notify the sender.

Hiscox Syndicates Ltd and Hiscox Insurance Company Ltd are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority. Hiscox Underwriting Limited, Hiscox Europe Underwriting Limited and Hiscox ASM Limited are authorised and regulated by the Financial Conduct Authority. Hiscox plc is a company registered in England and Wales under company registration number 2837811 and registered office at 1 Great St Helen's, London EC3A 6HX.



Amazing Grace
- Frank...OC.pdf

From: alan elliott (ucla) <alanelliott@g.ucla.edu> 
Subject: Fwd: amazing grace/sydney pollack
Date: June 9, 2016 at 12:16 PM
To: Shaun H. Crosner <scrosner@linerlaw.com>



thank you.

-alan

phone: 323 988 9692
peace and love.

<http://songsoundrecord.tumblr.com>

Begin forwarded message:

From: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Subject: amazing grace/sydney pollack
Date: June 9, 2016 at 11:54:05 AM PDT
To: Stephen Carroll <stephen.carroll@aon.com>
Cc: "Todd W. Musburger" <todd@musburger.com>, Tom McGuire <tmcguire@wmeentertainment.com>

hello stephen:

as we are obliged to update you and because sydney pollack is covered under the "amazing grace" e&o policy, as an update:

i had a presumed deal with lionsgate films. the deal was for \$2.3m and has fallen through because the sydney pollack estate has refused to further indemnify the film company.

lionsgate, down the stretch of the 8 month + negotiation asked us to "make peace" with barry tyerman- the attorney for the late sydney pollack (pollack died before the film was edited). lionsgate asked for a signed indemnification letter from the estate.

we had sold the film to lionsgate with full disclosure that mr. tyerman had asked me to remove mr. pollack's name as director of the film prior to the film festival in telluride last year. i did as mr. tyerman asked, removed mr. pollack's name from the film, and thought that would be the end (the film does NOT have the pollack name on it, nor did we ever warrant that we were selling a sydney pollack film).

to try to satisfy lionsgate, we prepared two separate letters (see below) in addition to the memo from warner films showing that pollack had been paid.

steve spira, the president of business affairs, has told me that mr. tyerman came to warner brothers looking for further payment. mr. spira told me that warners told mr. tyerman that according to mr. pollack's contract, warners felt there was no further compensation due to the estate.

also, bryan unger, the dga's associate national executive director, took the following position on behalf of the director's guild:

From: "Bryan Unger" <Bryan@dga.org>
Subject: Re: amazing grace/sydney pollack
Date: August 24, 2015 at 1:59:30 PM PDT
To: <alanelliott@g.ucla.edu>

Alan, I don't see a DGA issue here. This should be handled directly with the estate. Glad to hear you are moving the project along! - Bryan

G. Bryan Unger
Associate National Executive Director/Western Executive Director
Directors Guild of America
bryan@dga.org
310-289-5330

||| "alan elliott (ucla)" <alanelliott@g.ucla.edu> 8/17/2015 8:09 PM >>>
hey bryan

I know we have gone over this before but... my "amazing grace" film is now opening both telluride (confidential) and Toronto.

sydney pollack has a contract which wb paid him...

and so I was wondering if the dga wanted to weigh in on this in any way... as the estate may want to pull Sydney's name off the project.

all of this is to inform you of the situation.

we have other offers which are being negotiated. i have no plans to negotiate any further with mr. tyerman.



wb legal pollack
payment.pdf

46 KB



Tyerman
2016-0...1.docx

Downloading...



Chain of Title
Ltr (Am...inal.pdf

7.0 MB

thank you.

-alan

phone: 323 988 9692

peace and love.

<http://songsoundrecord.tumblr.com>

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: amazing grace/sydney pollack
Date: June 9, 2016 at 11:54 AM
To: Stephen Carroll stephen.carroll@aon.com
Cc: Todd W. Musburger todd@musburger.com, Tom McGuire tmcguire@wmeentertainment.com



hello stephen:

as we are obliged to update you and because sydney pollack is covered under the "amazing grace" e&o policy, as an update:

i had a presumed deal with lionsgate films. the deal was for \$2.3m and has fallen through because the sydney pollack estate has refused to further indemnify the film company.

lionsgate, down the stretch of the 8 month + negotiation asked us to "make peace" with barry tyerman- the attorney for the late sydney pollack (pollack died before the film was edited). lionsgate asked for a signed indemnification letter from the estate.

we had sold the film to lionsgate with full disclosure that mr. tyerman had asked me to remove mr. pollack's name as director of the film prior to the film festival in telluride last year. i did as mr. tyerman asked, removed mr. pollack's name from the film, and thought that would be the end (the film does NOT have the pollack name on it, nor did we ever warrant that we were selling a sydney pollack film).

to try to satisfy lionsgate, we prepared two separate letters (see below) in addition to the memo from warner films showing that pollack had been paid.

steve spira, the president of business affairs, has told me that mr. tyerman came to warner brothers looking for further payment. mr. spira told me that warners told mr. tyerman that according to mr. pollack's contract, warners felt there was no further compensation due to the estate.

also, bryan unger, the dga's associate national executive director, took the following position on behalf of the director's guild:

From: "Bryan Unger" <Bryan@dga.org>
Subject: Re: amazing grace/sydney pollack
Date: August 24, 2015 at 1:59:30 PM PDT
To: <alanelliott@g.ucla.edu>

Alan, I don't see a DGA issue here. This should be handled directly with the estate. Glad to hear you are moving the project along! - Bryan

G. Bryan Unger
Associate National Executive Director/Western Executive Director
Directors Guild of America
bryan@dga.org
310-289-5330

||| "alan elliott (ucla)" <alanelliott@g.ucla.edu> 8/17/2015 8:09 PM >>>
hey bryan

I know we have gone over this before but... my "amazing grace" film is now opening both telluride (confidential) and Toronto.

sydney pollack has a contract which wb paid him...

and so I was wondering if the dga wanted to weigh in on this in any way... as the estate may want to pull Sydney's name off the project.

all of this is to inform you of the situation.

we have other offers which are being negotiated. i have no plans to negotiate any further with mr. tyerman.



wb legal pollack
payment.pdf

46 KB



Tyerman
2016-0...1.docx

47 KB



Chain of Title
Ltr (Am...inal.pdf

7.0 MB

thank you.

-alan

phone: 323 988 9692
peace and love.

<http://songsoundrecord.tumblr.com>

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Re: Aretha Franklin Cease and Desist Demand
Date: September 4, 2015 at 7:30 AM



To: Annette Shavuo annette.shavuo@aon.com, Stephen Carroll stephen.carroll@aon.com
Cc: Tom McGuire tmcguire@wmeentertainment.com, Todd W. Musburger todd@musburger.com, Ilichter@ligna.com, Tom Luddy tom.luddy@gmail.com, Julie Huntsinger juliehuntsinger@me.com

dear insurers

please add the telluride film festival to the policy for:

2700815 Amazing Grace LLC

tom, Julie: if there are any specifics you would like, please contact stephen or Annette.

stephen is at:

(212) 337-4353 w
(914) 589-2474 c

Annette is at:

(212) 463-5586 w
(847) 953-0849 c

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.

On Sep 4, 2015, at 8:17 AM, Julie Huntsinger <juliehuntsinger@me.com> wrote:

You have?

We need to somehow be indemnified. Can your legal help with that?

Sent from my iPhone

Begin forwarded message:

From: Linda Lichter <llichter@ligna.com>
Date: September 4, 2015 at 8:11:39 AM MDT
To: Julie Huntsinger <juliehuntsinger@me.com>
Cc: Tom Luddy <tom.luddy@gmail.com>
Subject: Re: Aretha Franklin Cease and Desist Demand

Alan should show you whatever documentation he has concerning the name and likeness rights. Does he claim to have that?

Notwithstanding, there is no injunction yet, and not sure they'd get one against a non profit showing.

Ask Alan about giving telluride an indemnity.

Talk later.

Sent from my iPad

On Sep 4, 2015, at 12:26 AM, Julie Huntsinger <juliehuntsinger@me.com> wrote:

Alan tells me it ended today but this would indicate otherwise.

Thoughts?

Sent from my iPad

Begin forwarded message:

From: TFF Mail <mail@telluridefilmfestival.org>
Date: September 3, 2015 at 10:07:30 PM MDT
To: Julie Huntsinger <juliehuntsinger@me.com>
Subject: Fwd: Aretha Franklin Cease and Desist Demand

What?! How can I help here?

Begin forwarded message:

From: "Fresard, Fred" <FFresard@dykema.com>
Subject: Aretha Franklin Cease and Desist Demand
Date: September 3, 2015 at 9:33:52 PM MDT
To: "mail@telluridefilmfestival.org" <mail@telluridefilmfestival.org>
Cc: "Neureiter, Reid" <Neureiter@wtotrial.com>

Please see attached correspondence regarding Aretha Franklin's demand that the National Film Preserve, Ltd., a/k/a Telluride Film Festival refrain from showing the film "Amazing Grace."

Regards,

Fred Fresard



Fred J. Fresard
Member
FFresard@dykema.com
Licensed in Michigan and
Ontario, Canada

248-203-0593 Direct
248-203-0700 Main
855-233-1801 Fax
248-840-6314 Mobile

39577 Woodward Avenue, Suite 300
Bloomfield Hills, Michigan 48304
www.dykema.com

*** Notice from Dykema Gossett PLLC: This Internet message may contain information that is privileged, confidential, and exempt from disclosure. It is intended for use only by the person to whom it is addressed. If you have received this in error, please (1) do not forward or use this information in any way; and (2) contact me immediately. Neither this information block, the typed name of the sender, nor anything else in this message is intended to constitute an electronic signature unless a specific statement to the contrary is included in this message.

<Aretha Franklin Cease and Desist Demand.pdf>

From: alan elliott (ucla) alanelliott@g.ucla.edu

Subject: Fwd: Aretha Franklin; Sydney Pollack

Date: June 11, 2016 at 12:39 PM

To: linda burrow burrow@caldwell-leslie.com, Arwen R. Johnson johnson@caldwell-leslie.com, Tom McGuire tmcguire@wmeentertainment.com



thank you.

-alan

phone: [323 988 9692](tel:3239889692)
peace and love.

Begin forwarded message:

From: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Date: June 11, 2016 at 12:39:11 PM PDT
To: Stephen Carroll <stephen.carroll@aon.com>
Cc: "Todd W. Musburger" <todd@musburger.com>
Subject: Fwd: Aretha Franklin; Sydney Pollack

hi stephen

as we are bound to send you anything on sydney pollack, please see the following.

I plan no further negotiations with the estate.

thank you.

-alan

phone: [323 988 9692](tel:3239889692)
peace and love.

Begin forwarded message:

From: Tom McGuire <TMcGuire@wmeentertainment.com>
Date: June 11, 2016 at 12:13:12 PM PDT
To: 'Todd Musburger' <todd@musburger.com>, Liesl Copland <LCopland@wmeentertainment.com>, "Linda M. Burrow" <burrow@caldwell-leslie.com>, "Alan Elliott (ucla)" <alanelliott@g.ucla.edu>
Subject: Fwd: Aretha Franklin; Sydney Pollack

Sorry, I missed this yesterday when my phone died. We can discuss today if you all like.

Sent from my iPhone

Tom McGuire | WME

TMcGuire@wmeentertainment.com

310.248.3022

Begin forwarded message:

From: "Tyerman, Barry" <BTyerman@jtwamm.com>
Date: June 10, 2016 at 4:10:39 PM PDT
To: 'Tom McGuire' <TMcGuire@wmeentertainment.com>
Subject: RE: Aretha Franklin; Sydney Pollack

Tom,

I have done my best to accommodate your needs (and in particular desire for "additional recoupment"), consistent with the interests of the Sydney Pollack heirs and his rights and appropriate cash and contingent compensation therefor, and am

authorized to propose the following modified terms:

1. The actual direct third-party cost of completing the film would be deductible "off the top" as would payments to or on behalf of Aretha Franklin and Warner Bros.
2. It is our suggestion that a mutually approved competent and experienced production accountant prepare an itemized schedule of actual direct third-party production and postproduction costs paid to date and, if these are supportable, these too can be deducted "off the top".
3. The balance of proceeds from the exploitation of the film, after the WME sales fee, would be split 50/50.
4. Assuming the economic terms were mutually approved, the Pollack estate would review the film and establish the credit, if any, and the parameters for the use, if at all, of Mr. Pollack's name, likeness and other rights in connection with the exploitation of the film.

I recognize that your client has an exaggerated sense of his self-worth and creative contributions, but, needless to say, I consider the foregoing not only a substantial accommodation, but bordering on a gift, given the relative stature, experience and talent (not to mention the genesis of this project with Mr. Pollack and his as yet uncompensated contributions to production and postproduction and the liberal unauthorized use of his name and other rights in the promotion and sale of the film).

Also needless to say our suggestions are without prejudice to the Sydney Pollack rights, positions and remedies, all of which have been detailed in prior correspondence in connection with your efforts to acquire the Pollack rights and all of which are expressly reserved.

I look forward to hearing from you. Thanks. Barry

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor
Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448

From: Tom McGuire [<mailto:TMcGuire@wmeentertainment.com>]
Sent: Wednesday, May 11, 2016 2:56 PM
To: Tyerman, Barry
Subject: RE: Aretha Franklin; Sydney Pollack

I am going to need more recoument than that, but I will respond formally as soon as I can

get everyone on my side together. Most docs don't have a 43 year history, most docs don't have this doc's technical problems, most docs don't involve so many difficult personalities.

Tom McGuire | WME

TMcGuire@wmeentertainment.com

310.248.3022

From: Tyerman, Barry [<mailto:BTyerman@jtwamm.com>]

Sent: Wednesday, May 11, 2016 2:48 PM

To: Tom McGuire

Subject: RE: Aretha Franklin; Sydney Pollack

I think we could agree to carve out a corridor for the mutually approved direct prospective incremental third-party costs of doing whatever technical work would be required to deliver the film to Lions Gate. I think you said that number was approximately \$400,000 which sounds very high from my experience in the documentary world.

Barry W. Tyerman, Esq.

Jackoway Tyerman Wertheimer

Austen Mandelbaum Morris & Klein

1925 Century Park East, 22nd Floor Los Angeles, California 90067

Phone: (310) 553-0305

Firm Fax: (310) 553-5036

Direct Fax: (310) 551-4448

Email: BTyerman@jtwamm.com

From: Tom McGuire [<mailto:TMcGuire@wmeentertainment.com>]

Sent: Wednesday, May 11, 2016 2:44 PM

To: Tyerman, Barry

Subject: RE: Aretha Franklin; Sydney Pollack

Just so I am clear, no ability for Alan to recoup any costs other than costs related to Aretha?
No Warner Bros costs, no costs to complete the film?

Tom McGuire | WME

TMcGuire@wmeentertainment.com

310.248.3022

From: Tyerman, Barry [<mailto:BTyerman@jtwamm.com>]

Sent: Wednesday, May 11, 2016 2:26 PM

To: Tom McGuire

Subject: Aretha Franklin; Sydney Pollack

Tom,

In deference to Aretha Franklin (and her apparent desire to clear a path for distribution of this material), subject to working through other appropriate terms and conditions (approval of the finished program; appropriate approvals on the use of Sydney Pollack's name, photograph, likeness and biographical material, etc.), we would be prepared to grant the necessary rights for sums payable through a collection account equal to 50% of the gross revenue from licensing and other exploitation of the program, after set-aside of the guaranteed Aretha Franklin payment, and after deduction "off the top" of payments of contingent compensation to Aretha Franklin. This obviously is significantly less than we had originally sought and than what we believe is fair compensation for the Sydney Pollack rights, but we want to "cut to the chase" as their appears to be a narrow window to bring this all together and avoid litigation and the project going "back on the shelf".

I look forward to hearing from you. Barry

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448
Email: BTyerman@jtwamm.com

From: Tom McGuire [<mailto:TMcGuire@wmeentertainment.com>]

Sent: Monday, May 09, 2016 2:00 PM

To: Tyerman, Barry

Subject: RE: Hey Barry

Hello again

If we could get something in the next 24 hours, that would be ok—Aretha is making noises, everyone else is trying not to lose faith, etc.

Tom

Tom McGuire | WME
TMcGuire@wmeentertainment.com
310.248.3022

From: Tyerman, Barry [<mailto:BTyerman@jtwamm.com>]
Sent: Friday, May 06, 2016 3:36 PM
To: Tom McGuire
Subject: RE: Hey Barry

I will discuss this with the Pollacks and try to suggest something which gives you the rights you are seeking but within the finances as they exist. Barry

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor
Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448

-----Original Message-----

From: Tom McGuire [TMcGuire@wmeentertainment.com]
Received: Friday, 06 May 2016, 3:31PM
To: Tyerman, Barry [BTyerman@jtwamm.com]
Subject: Hey Barry

Still trying to figure out what you want to make a deal work on Aretha. You are the last piece, and although I think we differ on the legalities of it all, there are a lot of people who have worked hard to get this film done, it would be a shame to take a blowtorch to all their work. Lets figure out a deal.

Tom

Tom McGuire | WME
TMcGuire@wmeentertainment.com
310.248.3022

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Fwd: Aretha Franklin/Injunction/"Amazing Grace"
Date: September 4, 2015 at 11:26 AM
To: Stephen Carroll stephen.carroll@aon.com, Annette Shavuo annette.shavuo@aon.com



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.

Begin forwarded message:

From: Tom McGuire <TMcGuire@wmeentertainment.com>
Date: September 4, 2015 at 12:20:47 PM MDT
To: "srodgers@fwlaw.com" <srodgers@fwlaw.com>, "jtanner@fwlaw.com" <jtanner@fwlaw.com>
Cc: "Todd Musburger (todd@musburger.com)" <todd@musburger.com>, "alan elliott (ucla) (alanelliott@g.ucla.edu)" <alanelliott@g.ucla.edu>
Subject: Aretha Franklin/Injunction/"Amazing Grace"

Gentlemen:

I have spoken to our client and his lawyer on this matter, and Alan will take on the obligation of paying your fees.

Let me know if you have any question on this matter. I look forward to working with you on this.

Tom McGuire

Tom McGuire | WME
TMcGuire@wmeentertainment.com
310.248.3022

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
Subject: Automatic reply: amazing grace confirmation
Date: July 14, 2015 at 7:19 AM
To: alan elliott (ucla) 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. I will have limited access to e-mail.

From: Stephen Carroll 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



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.

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Fwd: Call with Aretha's counsel
Date: September 4, 2015 at 11:25 AM
To: Stephen Carroll stephen.carroll@aon.com, Annette Shavuo annette.shavuo@aon.com



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@alaneliott.net.

Begin forwarded message:

From: Linda Lichter <lichter@ligna.com>
Date: September 4, 2015 at 12:23:08 PM MDT
To: Tom McGuire <TMcGuire@wmeentertainment.com>
Cc: "Todd Musburger (todd@musburger.com)" <todd@musburger.com>, "Matt Farmer (mifarmer0@gmail.com)" <mifarmer0@gmail.com>, "alan elliott (ucla) (alanelliott@g.ucla.edu)" <alanelliott@g.ucla.edu>, Liesl Copland <LCopland@wmeentertainment.com>
Subject: Re: Call with Aretha's counsel

If there is a hearing when will it be?

Linda Lichter

On Sep 4, 2015, at 12:15 PM, Tom McGuire <TMcGuire@wmeentertainment.com> wrote:

Linda:

Alan's lawyer Todd Musburger and I had a call with Aretha's Detroit, Denver and LA counsel this morning to fully and fairly discuss matters.

Todd promised to get them the documents which form the basis for our chain of title, and he has now done so.

They are reviewing, and there will be another call to discuss whether there will be litigation or deal discussions. I believe they heard us when Todd very calmly walked them through our arguments.

IMPORTANT: Alan is not a defendant here. The festival is. Does the festival have litigation counsel that will be present if there is a hearing today? if so, we should know who that is so we can speak to them and get them up to speed.

Thanks, Linda.

Tom

Tom McGuire | WME
TMcGuire@wmeentertainment.com
310.248.3022

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: checking in...
Date: January 7, 2016 at 4:57 PM
To: Lincoln Bandlow lbandlow@foxrothschild.com



so first... i am wanting to find a way to blow this up AND have insurance pay for it... and i want you to start to investigate.

i am attaching the letter tara bodden sent... which acknowledges that hiscox KNEW about things before voiding my policy ("We acknowledge that you raised the issue of Ms. Franklin's consent (and lack thereof) with Hiscox during the policy's underwriting. But during these discussions, Hiscox was not advised that Ms. Franklin had actually gone so far as to file suit seeking to join the film's release.")

that's b.s.

i told them.

a few times.

and i explained why, in question #27 in question, i answered "non" because:

- a) it was not a court ordered settlement (it was a private settlement)
- b) my lawyers had sent notice that the settlement was no longer applicable once i received aretha franklin's contract
- c) since there had been no acknowledgement from aretha franklin's side, we considered it a mot point.

i am writing, lincoln, as i wanna find a way to pay you...

and i know you know hiscox... and they like and trust you...

and they should be paying you so we can go fight back.



Amazing Grace
- Frank...OC.pdf

thank you.

-alan

phone: 323 988 9692
peace and love.

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



The Rights Workshop, Inc.
 1800 Bryant Street, Suite 104
 San Francisco, CA 94110
 (415) 561-3333
 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	• Music license fees • Holy Holy, How I Got Over, Precious Lord Take My Hand, You've Got a Friend, My Sweet Lord, • Old Landmark, Mary Don't You Weep	7	500.00	3,500.00
Total				\$5,250.00

Thank you for your business. Please note Federal ID#: 42-1655690.



From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Fwd: Complaint--lawsuit filed by Aretha Franklin -- FW: Complaint + Exhibits 1-7
Date: September 4, 2015 at 8:54 AM
To: Annette Shavuo annette.shavuo@aon.com, Stephen Carroll stephen.carroll@aon.com
Cc: Todd W. Musburger todd@musburger.com, Tom McGuire tmcguire@wmeentertainment.com, Ilichter@ligna.com

for insurers

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.

Begin forwarded message:

From: Todd Musburger <todd@musburger.com>
Date: September 4, 2015 at 9:27:31 AM MDT
To: ALAN ELLIOTT <alanelliott@g.ucla.edu>, Tom McGuire <tmcguire@wmeentertainment.com>, Matt Farmer <mifarmer0@gmail.com>
Subject: Fwd: FW: Complaint--lawsuit filed by Aretha Franklin -- FW: Complaint + Exhibits 1-7

This just arrived. Todd is still on the plane.

-Rebecca

Todd W. Musburger
Todd W. Musburger, Ltd.
142 E. Ontario
Suite 500
Chicago, Illinois 60611
312 664 2600

----- Forwarded message -----

From: Neureiter, Reid <Neureiter@wtotrial.com>
Date: Fri, Sep 4, 2015 at 8:59 AM
Subject: FW: Complaint--lawsuit filed by Aretha Franklin -- FW: Complaint + Exhibits 1-7
To: Todd Musburger <todd@musburger.com>
Cc: "Cantor, Jon D." <JDCantor@dykema.com>, "Fresard, Fred" <FFresard@dykema.com>

Mr. Musburger,

This Complaint was filed early this morning in Denver Federal Court, District of Colorado.

Regards
Reid Neureiter
[303-244-1993](tel:303-244-1993)

-----Original Message-----

From: Neureiter, Reid
Sent: Friday, September 4, 2015 1:48 AM
To: 'shannon@telluridefilmfestival.org'
Subject: FW: Complaint--lawsuit filed by Aretha Franklin -- FW: Complaint + Exhibits 1-7
Importance: High

To whom it may concern at the Telluride Film Festival, including co-Director Julie Huntsinger (as registered agent),

Attached find a federal lawsuit filed early this morning on behalf of Aretha Franklin seeking an injunction to stop the public showing or release of the Film "Amazing Grace," which, based on public reports, is to be shown at 7:30 p.m in Telluride. We will be seeking an immediate audience with the Federal Court in Denver to protect Ms. Franklin's rights to her name and likeness. As the exhibits hereto show, the Producer of the film, Mr. Elliot, was never granted permission by Ms. Franklin to publicly show the film and publicly displaying any footage of Ms. Franklin's 1972 concert would be a significant violation of her rights as well as a violation of the federal anti-bootlegging statute.

Please have an authorized representative of the Festival (preferably your legal counsel) contact me immediately in the event the

Festival wants to be heard by the Court.

I can be reached at my office line [303-244-1993](tel:303-244-1993) or my cell phone [303-917-3871](tel:303-917-3871).

Thank you for your prompt attention to this request.

Wheeler Trigg O'Donnell LLP
N. Reid Neureiter
Of Counsel
[303.244.1993](tel:303.244.1993)
neureiter@wtotrial.com

370 Seventeenth Street, Suite 4500
Denver, Colorado 80202-5647
P [303.244.1800](tel:303.244.1800) F [303.244.1879](tel:303.244.1879)
wtotrial.com



Exhibit 1.pdf

[1.7 MB](#)



Exhibit 2.pdf

[1.6 MB](#)



Exhibit 3.pdf

[271 KB](#)



Exhibit 4.pdf

[185 KB](#)



Exhibit 5.pdf

[2.1 MB](#)



Exhibit 6.pdf

3.4 MB



Exhibit 7.pdf

4.3 MB



ECF Transaction
Receipt.pdf

126 KB



Complaint for
Emergency Relief.pdf

36 KB

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Fwd: Complaint--lawsuit filed by Aretha Franklin -- FW: Complaint + Exhibits 1-7
Date: September 4, 2015 at 7:50 AM
To: Stephen Carroll stephen.carroll@aon.com, Annette Shavuo annette.shavuo@aon.com



more for insurers

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.

Begin forwarded message:

From: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Date: September 4, 2015 at 8:22:23 AM MDT
To: Julie Huntsinger <juliehuntsinger@me.com>
Cc: Tom Luddy <tom.luddy@gmail.com>, "Todd W. Musburger" <todd@musburger.com>, Tom McGuire <tmcguire@wmeentertainment.com>
Subject: Re: Complaint--lawsuit filed by Aretha Franklin -- FW: Complaint + Exhibits 1-7

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.

On Sep 4, 2015, at 7:33 AM, Julie Huntsinger <juliehuntsinger@me.com> wrote:

| Loading...

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Fwd: draft of letter to hiscox.
Date: May 10, 2017 at 12:50 PM
To: Todd W. Musburger todd@musburger.com



thank you.

-alan

phone: 323 988 9692

peace and love.

Begin forwarded message:

From: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Subject: draft of letter to hiscox.
Date: May 10, 2017 at 12:22:18 PM PDT
To: Lew Loss <lloss@ljwllp.com>, Charles Chotvacs <cchotvacs@ljwllp.com>

please take a look:

Dear Laura

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

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 this type of volatility as demonstrated by Ms. Franklin.

Further, the turbulent nature of Ms. Franklin's 2011 lawsuit was THE SINGULAR FUNDAMENTAL upon which every conversation with Hiscox/AON was based. Insurance would allow me to defend and enforce Ms. Franklin recently discovered (in 2013) Warner Films' personal service contract.

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. In fact, the pdf of the "cease and desist" settlement that resulted from the 2011 lawsuit was provided to all parties as part of the application and is included in multiple emails.

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 in fact helped craft that answer and Hiscox is not correct in declining. The answer was discussed and deliberated with Hiscox through Joanne Richardson, with Hiscox's counsel Ted Gerdes and with AON's Stephen Carroll and Annette Shavuo.

Because of the 2013 discover of the personal service contract, AON/Hiscox vetted the contract and when the question came up EVERYONE was aware of the prior issues and that they were satisfied that solidity of the personal service contract and that was evinced in the answer.

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 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.

Most importantly though, 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

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.

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>
Subject: amazing grace; 27700815
Date: May 8, 2017 at 1:56:22 PM PDT

To: Stephen Carroll <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: Charles Chotvacs cchotvacs@ljwllp.com
Subject: RE: draft of letter to hiscox.
Date: May 10, 2017 at 2:36 PM
To: alan elliott (ucla) alanelliott@g.ucla.edu
Cc: Lew Loss lloss@ljwllp.com



Alan –

Thank you for this. Do you have time tomorrow morning for a call with Lew and me to discuss the draft and next steps? We are available between 11 a.m. – 1 p.m. EST (8 – 10 a.m. PST).

Thanks,

Chuck

CHARLES W. CHOTVACS | LOSS, JUDGE & WARD, LLP

HAMILTON SQUARE | 600 14TH STREET, NW | SUITE 450 | WASHINGTON, DC 20005
DIRECT DIAL: 202.778.4078 | MAIN: 202.778.4060 | FACSIMILE: 202.778.4099
WWW.LJWLLP.COM

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Wednesday, May 10, 2017 3:22 PM
To: Lew Loss; Charles Chotvacs
Subject: draft of letter to hiscox.

please take a look:

—
Dear Laura

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

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 this type of volatility as demonstrated by Ms. Franklin.

Further, the turbulent nature of Ms. Franklin’s 2011 lawsuit was THE SINGULAR FUNDAMENTAL upon which every conversation with Hiscox/AON was based. Insurance

would allow me to defend and enforce Ms. Franklin recently discovered (in 2013) Warner Films' personal service contract.

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. In fact, the pdf of the "cease and desist" settlement that resulted from the 2011 lawsuit was provided to all parties as part of the application and is included in multiple emails.

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 in fact helped craft that answer and Hiscox is not correct in declining. The answer was discussed and deliberated with Hiscox through Joanne Richardson, with Hiscox's counsel Ted Gerdes and with AON's Stephen Carroll and Annette Shavuo.

Because of the 2013 discover of the personal service contract, AON/Hiscox vetted the contract and when the question came up- EVERYONE was aware of the prior issues and that they were satisfied that solidity of the personal service contract and that was evinced in the answer.

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 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.

Most importantly though, 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.

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>

Subject: amazing grace; 27700815

Date: May 8, 2017 at 1:56:22 PM PDT

To: Stephen Carroll <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.

Please consider the environment before printing this e-mail.

This communication, including attachments, is confidential, may be subject to legal privileges, and is intended for the sole use of the addressee. Any use, duplication, disclosure, or dissemination of this communication, other than by the addressee, is prohibited. If you have received this communication in error, please notify the sender immediately and delete or destroy this communication and all copies.

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Re: draft of letter to hiscox.
Date: May 10, 2017 at 2:54 PM
To: Charles Chotvacs cchotvacs@ljwllp.com
Cc: Lew Loss lloss@ljwllp.com



yes.

let's please chat tomorrow at 830am pst/1130 est.

thank you.

-alan

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

peace and love.

On May 10, 2017, at 2:36 PM, Charles Chotvacs <cchotvacs@ljwllp.com> wrote:

Alan –

Thank you for this. Do you have time tomorrow morning for a call with Lew and me to discuss the draft and next steps? We are available between 11 a.m. – 1 p.m. EST (8 – 10 a.m. PST).

Thanks,

Chuck

CHARLES W. CHOTVACS | LOSS, JUDGE & WARD, LLP

HAMILTON SQUARE | 600 14TH STREET, NW | SUITE 450 | WASHINGTON, DC 20005
DIRECT DIAL: 202.778.4078 | MAIN: 202.778.4060 | FACSIMILE: 202.778.4099
WWW.LJWLLP.COM

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

Sent: Wednesday, May 10, 2017 3:22 PM

To: Lew Loss; Charles Chotvacs

Subject: draft of letter to hiscox.

please take a look:

Dear Laura

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

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

OFFERS WERE OFFERED 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 this type of volatility as demonstrated by Ms. Franklin.

Further, the turbulent nature of Ms. Franklin's 2011 lawsuit was THE SINGULAR FUNDAMENTAL upon which every conversation with Hiscox/AON was based. Insurance would allow me to defend and enforce Ms. Franklin recently discovered (in 2013) Warner Films' personal service contract.

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. In fact, the pdf of the "cease and desist" settlement that resulted from the 2011 lawsuit was provided to all parties as part of the application and is included in multiple emails.

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 in fact helped craft that answer and Hiscox is not correct in declining. The answer was discussed and deliberated with Hiscox through Joanne Richardson, with Hiscox's counsel Ted Gerdes and with AON's Stephen Carroll and Annette Shavuo.

Because of the 2013 discover of the personal service contract, AON/Hiscox vetted the contract and when the question came up- EVERYONE was aware of the prior issues and that they were satisfied that solidity of the personal service contract and that was evinced in the answer.

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 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.

Most importantly though, 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.

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>

Subject: amazing grace; 27700815

Date: May 8, 2017 at 1:56:22 PM PDT

To: Stephen Carroll <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.

Please consider the environment before printing this e-mail.

This communication, including attachments, is confidential, may be subject to legal privileges, and is intended for the sole use of the addressee. Any use, duplication, disclosure, or dissemination of this communication, other than by the addressee, is prohibited. If you have received this communication in error, please notify the sender immediately and delete or destroy this communication and all copies.

From: Charles Chotvacs cchotvacs@ljwllp.com
Subject: RE: draft of letter to hiscox.
Date: May 10, 2017 at 2:55 PM
To: alan elliott (ucla) alanelliott@g.ucla.edu
Cc: Lew Loss lloss@ljwllp.com



Great – talk to you then. We'll call your cell number below.

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Wednesday, May 10, 2017 5:54 PM
To: Charles Chotvacs
Cc: Lew Loss
Subject: Re: draft of letter to hiscox.

yes.

let's please chat tomorrow at 830am pst/1130 est.

thank you.

-alan

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

peace and love.

On May 10, 2017, at 2:36 PM, Charles Chotvacs <cchotvacs@ljwllp.com> wrote:

Alan –

Thank you for this. Do you have time tomorrow morning for a call with Lew and me to discuss the draft and next steps? We are available between 11 a.m. – 1 p.m. EST (8 – 10 a.m. PST).

Thanks,

Chuck

CHARLES W. CHOTVACS | LOSS, JUDGE & WARD, LLP

HAMILTON SQUARE | 600 14TH STREET, NW | SUITE 450 | WASHINGTON, DC 20005
DIRECT DIAL: 202.778.4078 | MAIN: 202.778.4060 | FACSIMILE: 202.778.4099
WWW.LJWLLP.COM

From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Wednesday, May 10, 2017 3:22 PM
To: Lew Loss; Charles Chotvacs
Subject: draft of letter to hiscox.

Please take a look:

please take a look.

Dear Laura

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

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 this type of volatility as demonstrated by Ms. Franklin.

Further, the turbulent nature of Ms. Franklin's 2011 lawsuit was THE SINGULAR FUNDAMENTAL upon which every conversation with Hiscox/AON was based. Insurance would allow me to defend and enforce Ms. Franklin recently discovered (in 2013) Warner Films' personal service contract.

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. In fact, the pdf of the "cease and desist" settlement that resulted from the 2011 lawsuit was provided to all parties as part of the application and is included in multiple emails.

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 in fact helped craft that answer and Hiscox is not correct in declining. The answer was discussed and deliberated with Hiscox through Joanne Richardson, with Hiscox's counsel Ted Gerdes and with AON's Stephen Carroll and Annette Shavuo.

Because of the 2013 discover of the personal service contract, AON/Hiscox vetted the contract and when the question came up- EVERYONE was aware of the prior issues and that they were satisfied that solidity of the personal service contract and that was evinced in the answer.

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 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.

Most importantly though, 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.

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>
Subject: amazing grace; 27700815
Date: May 8, 2017 at 1:56:22 PM PDT
To: Stephen Carroll <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.

Please consider the environment before printing this e-mail.

This communication, including attachments, is confidential, may be subject to legal privileges, and is intended for the sole use of the addressee. Any use, duplication, disclosure, or dissemination of this communication, other than by the addressee, is prohibited. If you have received this communication in error, please notify the sender immediately and delete or destroy this communication and all copies.

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Re: draft of letter to hiscox.
Date: May 10, 2017 at 2:58 PM
To: Charles Chotvacs cchotvacs@ljwllp.com
Cc: Lew Loss lloss@ljwllp.com



ok

thank you.

-alan

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

peace and love.

On May 10, 2017, at 2:55 PM, Charles Chotvacs <cchotvacs@ljwllp.com> wrote:

Great – talk to you then. We’ll call your cell number below.

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Wednesday, May 10, 2017 5:54 PM
To: Charles Chotvacs
Cc: Lew Loss
Subject: Re: draft of letter to hiscox.

yes.

let's please chat tomorrow at 830am pst/1130 est.

thank you.

-alan

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

peace and love.

On May 10, 2017, at 2:36 PM, Charles Chotvacs <cchotvacs@ljwllp.com> wrote:

Alan –

Thank you for this. Do you have time tomorrow morning for a call with Lew and me to discuss the draft and next steps? We are available between 11 a.m. – 1 p.m. EST (8 – 10 a.m. PST).

Thanks,

Chuck

CHARLES W. CHOTVACS | LOSS, JUDGE & WARD, LLP

HAMILTON SQUARE | 600 14TH STREET, NW | SUITE 450 | WASHINGTON, DC 20005

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Wednesday, May 10, 2017 3:22 PM
To: Lew Loss; Charles Chotvacs
Subject: draft of letter to hiscox.

please take a look:

Dear Laura

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

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 this type of volatility as demonstrated by Ms. Franklin.

Further, the turbulent nature of Ms. Franklin's 2011 lawsuit was THE SINGULAR FUNDAMENTAL upon which every conversation with Hiscox/AON was based. Insurance would allow me to defend and enforce Ms. Franklin recently discovered (in 2013) Warner Films' personal service contract.

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. In fact, the pdf of the "cease and desist" settlement that resulted from the 2011 lawsuit was provided to all parties as part of the application and is included in multiple emails.

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 in fact helped craft that answer and Hiscox is not correct in declining. The answer was discussed and deliberated with Hiscox through Joanne Richardson, with Hiscox's counsel Ted Gerdes and with AON's Stephen Carroll and Annette Shavuo.

Because of the 2013 discover of the personal service contract, AON/Hiscox vetted the contract and when the question came up- EVERYONE was aware of the prior issues and that they were satisfied that solidity of the personal service contract and that was evinced in the answer.

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 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.

Most importantly though, 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.

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>
Subject: amazing grace; 27700815
Date: May 8, 2017 at 1:56:22 PM PDT
To: Stephen Carroll <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.

Please consider the environment before printing this e-mail.

This communication, including attachments, is confidential, may be subject to legal privileges, and is intended for the sole use of the addressee. Any use, duplication, disclosure, or dissemination of this communication, other than by the addressee, is prohibited. If you have received this communication in error, please notify the sender immediately and delete or destroy this communication and all copies.

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Fwd: draft of letter to hiscox.
Date: May 10, 2017 at 3:05 PM
To: raj@ineteconomics.org



insurance conversation tomorrow...

thank you.

-alan

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

peace and love.

Begin forwarded message:

From: Charles Chotvacs <cchotvacs@ljwllp.com>
Date: May 10, 2017 at 2:55:34 PM PDT
To: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Cc: Lew Loss <lloss@ljwllp.com>
Subject: RE: draft of letter to hiscox.

Great – talk to you then. We'll call your cell number below.

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Wednesday, May 10, 2017 5:54 PM
To: Charles Chotvacs
Cc: Lew Loss
Subject: Re: draft of letter to hiscox.

yes.

let's please chat tomorrow at 830am pst/1130 est.

thank you.

-alan

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

peace and love.

On May 10, 2017, at 2:36 PM, Charles Chotvacs <cchotvacs@ljwllp.com> wrote:

Alan –

Thank you for this. Do you have time tomorrow morning for a call with Lew and me to discuss the draft and next steps? We are available between 11 a.m. – 1 p.m. EST (8 – 10 a.m. PST).

Thanks,

Chuck

CHARLES W. CHOTVACS | LOSS, JUDGE & WARD, LLP

HAMILTON SQUARE | 600 14TH STREET, NW | SUITE 450 | WASHINGTON, DC 20005
DIRECT DIAL: 202.778.4078 | MAIN: 202.778.4060 | FACSIMILE: 202.778.4099
WWW.LJWLLP.COM

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

Sent: Wednesday, May 10, 2017 3:22 PM

To: Lew Loss; Charles Chotvacs

Subject: draft of letter to hiscox.

please take a look:

—
Dear Laura

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

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 this type of volatility as demonstrated by Ms. Franklin.

Further, the turbulent nature of Ms. Franklin's 2011 lawsuit was THE SINGULAR FUNDAMENTAL upon which every conversation with Hiscox/AON was based. Insurance would allow me to defend and enforce Ms. Franklin recently discovered (in 2013) Warner Films' personal service contract.

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. In fact, the pdf of the "cease and desist" settlement that resulted from the 2011 lawsuit was provided to all parties as part of the application and is included in multiple emails.

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 in fact helped craft that answer and Hiscox is not correct in declining. The answer was discussed and deliberated with Hiscox through Joanne Richardson, with Hiscox's counsel Ted Gerdes and with AON's Stephen Carroll and Annette Shavuo.

Because of the 2013 discover of the personal service contract, AON/Hiscox vetted the contract and when the question came up- EVERYONE was aware of the prior issues and that they were satisfied that solidity of the personal service contract and that was evinced in the answer.

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 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.

Most importantly though, 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.

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>

Subject: amazing grace; 27700815
Date: May 8, 2017 at 1:56:22 PM PDT
To: Stephen Carroll <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.

Please consider the environment before printing this e-mail.

This communication, including attachments, is confidential, may be subject to legal privileges, and is intended for the sole use of the addressee. Any use, duplication, disclosure, or dissemination of this communication, other than by the addressee, is prohibited. If you have received this communication in error, please notify the sender immediately and delete or destroy this communication and all copies.

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: draft of letter to hiscox.
Date: May 10, 2017 at 12:22 PM
To: Lew Loss lloss@ljwllp.com, Charles Chotvac cchotvac@ljwllp.com



please take a look:

Dear Laura

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

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 this type of volatility as demonstrated by Ms. Franklin.

Further, the turbulent nature of Ms. Franklin's 2011 lawsuit was THE SINGULAR FUNDAMENTAL upon which every conversation with Hiscox/AON was based. Insurance would allow me to defend and enforce Ms. Franklin recently discovered (in 2013) Warner Films' personal service contract.

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. In fact, the pdf of the "cease and desist" settlement that resulted from the 2011 lawsuit was provided to all parties as part of the application and is included in multiple emails.

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 in fact helped craft that answer and Hiscox is not correct in declining. The answer was discussed and deliberated with Hiscox through Joanne Richardson, with Hiscox's counsel Ted Gerdes and with AON's Stephen Carroll and Annette Shavuo.

Because of the 2013 discover of the personal service contract, AON/Hiscox vetted the contract and when the question came up EVERYONE was aware of the prior issues and that they were satisfied that solidity of the personal service contract and that was evinced in the answer.

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 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.

Most importantly though, 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.

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>
Subject: amazing grace; 27700815
Date: May 8, 2017 at 1:56:22 PM PDT
To: Stephen Carroll <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: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Re: E&O Policy
Date: April 22, 2016 at 10:30 AM
To: Annette Shavuo annette.shavuo@aon.com
Cc: Todd Musburger todd@musburger.com, Everett Hendler ehendler@lionsgate.com



hi Annette

can you please make the correction asked for below.

thank you.

-alan

phone: [323 988 9692](tel:3239889692)
peace and love.

On Apr 22, 2016, at 10:23 AM, Todd Musburger <todd@musburger.com> wrote:

Alan: Write to her requesting the change that Everett cites - he is correct - and we will need that with anyone we deal with >Thx

Todd W. Musburger
Todd W. Musburger, Ltd.
142 E. Ontario
Suite 500
Chicago, Illinois 60611
312 664 2600

----- Forwarded message -----
From: **Everett Hendler** <ehendler@lionsgate.com>
Date: Fri, Apr 22, 2016 at 12:15 PM
Subject: RE: E&O Policy
To: Todd Musburger <todd@musburger.com>

Understood.

One slight mistake that needs to be corrected on this new endorsement. Endorsement 8 is actually numbered "E2542.1" not "E2582" as indicated on Endorsement 10. Please have the carrier update this so it properly identifies the deletion.

Endorsement 10 should read as "...it is agreed that Endorsement **E2542.1** Failure to Obtain License Exclusion is/are deleted..."

Thank you for working through the rest, Todd.

Best,
Everett



From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Re: e&o
Date: July 6, 2016 at 5:58 PM
To: Larry Blake Larry.Blake@concordmusicgroup.com
Cc: Scott Pascucci scottpascucci@concordbicycle.com



bit by bit below...

thank you.

On Jul 6, 2016, at 5:48 PM, Larry Blake <Larry.Blake@concordmusicgroup.com> wrote:

Hi Alan:

I've reviewed the E&) policy you sent (copy attached for ease of reference) and have some questions:

1.
 - a. Can you give me the name and contact information of the individual at Albert G Ruben who placed the coverage?

stephen carroll (card attached):



Stephen
Carroll.vcf

- b. Do you mind if I call him/her?

please do!

2.
 - a. If you used a lawyer to negotiate the coverage, please give me the name and contact info.

i did the grunt work...

- b. Do you mind if I call him/her?

larry, you can always call me...

3. Endorsement 5 provides that the insurer is relying on all statements and information provided in your application, so please provide me with a copy of that application.

here you go:



amazing grace
App- R...03.doc

4. There is an exclusion as to the title of the production unless a satisfactory Title

4. There is an exclusion as to the title of the production unless a satisfactory Title Search and Report has been approved by the insurer and endorsed to the policy. Have you obtained a Title Search and Report?

"amazing grace" as a title... i was pretty sure had been registered before so i saved the money on a title search...

5. You are obligated under section VII to notify the insurer of any material changes to the content of the production. Have there been any material changes since the policy was issued?

no.

If not yet, arguably the addition of interviews or other material will require notice.

yes. i don't think that'll be a game changer.

also... attached is the music clearance stuff.

it was done by brooke wentz.



Aretha.pdf

Thanks,

Larry

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

Sent: Tuesday, July 05, 2016 5:38 PM

To: Larry Blake <Larry.Blake@concordmusicgroup.com>; Scott Pascucci <scottpascucci@concordbicycle.com>

Subject: e&o

<Amazing Grace LLC_ E&O Policy (2015-2018).pdf>

From: George Passion georgec@passion-pictures.com
Subject: Re: E&O
Date: February 2, 2015 at 4:53 AM
To: Alan Elliott Alan@AlanElliott.net
Cc: john battsek john@passion-pictures.com, Joe Boyd boyd1j@yahoo.co.uk

GP

Hi Alan

Stephens email address is Stephen.carroll@aon.com - I have also been given his colleague Ramona's details so probably worth copying her on it as well - Ramona.horne@aon.com.

Best

George

Sent from my iPad

On 30 Jan 2015, at 23:29, Alan Elliott <Alan@AlanElliott.net> wrote:

hey george and co.

i left a few messages for stephen the insurance man... with no reply. is there an email (perhaps he is not used to the old fashioned phone technology)?

thank you.

-alan

phone: 323 988 9692

This email 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.

On Jan 13, 2015, at 3:10 AM, George Chignell <georgec@passion-pictures.com> wrote:

Hi Alan

Good to talk to you and sorry for taking a while to come back to you.

I've spoken to our brokers her and you'll be pleased to know I was wrong! If you put E&O in place now it would cover you for any claims against you prior to release of the film – the policy applies as soon as you take it out. The key thing is to make sure that you have a CLAIMS MADE POLICY and not an OCCURRENCE policy – the former covers you from when the policy is taken out and the latter (which is often used in the US) they insurers can not pay out if they think that the claim is based on an occurrence prior to the policy being taken out.

I hope that's helpful!

Below are details of the insurers in New York that we would recommend:

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

212-633-1457

If you would like a new lawyer to give an opinion on the events of the past and your legal liability I can recommend Russell Smith of SmithDehn – if you would like his details I can send them through and introduce you to him.

Best

George

GEORGE CHIGNELL
PRODUCER - HEAD OF PRODUCTION

3rd Floor
Kirkman House
12-14 Whitfield Street
LONDON W1T 2RF
+44 (0)20 7323 9933
+44 (0)7957 409 150
PASSION-PICTURES.COM

[<image001.png>](#)

From: alan elliott [<mailto:Alan@AlanElliott.net>]
Sent: 06 January 2015 17:41
To: john battsek
Cc: Joe Boyd; George Chignell
Subject: Re: E&O

hi all

George when is a good time to talk?

thank you.

phone: 323 988 9692

Sent from a iPhone

[<~WRD343.jpg>](#)

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.

On Jan 6, 2015, at 9:34 AM, john battsek john@passion-pictures.com wrote:

Alan

Meet George who is head of production here at Passion as well as producer of our Ali doc I am Ali and the Marlon Brando doc with me.

She can walk you through the whole E&O process.

jb

JOHN BATTSEK
PRODUCER - MD

3rd Floor
Kirkman House
12-14 Whitfield Street
LONDON W1T 2RF
+44 (0)20 7323 9933
+44 (0)7770 920 064
+1 646 248 2605
PASSION-PICTURES.COM

[<image001.png>](#)

Registered Address: Passion Pictures Ltd, 33-34 Rathbone Place, London W1T 1JN.
Registration number: 2177709. Registered in England & Wales

Disclaimer

This message (and any associated files) is intended only for the use of the individual or entity to which it is addressed and may contain information that is confidential, subject to copyright or constitutes a trade secret. If you are not the intended recipient you are hereby notified that any dissemination, copying or distribution of this message, or files associated with this message, is strictly prohibited. If you have received this message in error, please notify us immediately by replying to the message and deleting it from your computer. Messages sent to and from us may be monitored.

Internet communications cannot be guaranteed to be secure or error-free as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete, or contain viruses. Therefore, we do not accept responsibility for any errors or omissions that are present in this message, or any attachment, that have arisen as a result of e-mail transmission. If verification is required, please request a hard-copy version. Any views or opinions presented are solely those of the author and do not necessarily represent those of the company.

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Favorites
Date: July 9, 2015 at 11:36 AM
To: Stephen Carroll stephen.carroll@aon.com



[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)



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

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.

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Fwd: FOR IMMEDIATE RELEASE: ARETHA FRANKLIN FILES INJUNCTION AGAINST 'AMAZING GRACE' FILM
Date: September 3, 2015 at 11:02 AM
To: Stephen Carroll stephen.carroll@aon.com, Annette Shavuo annette.shavuo@aon.com
Cc: Todd W. Musburger todd@musburger.com



hi insurers:

so you know...

we just got this. I have not been served. But we wanted to make you aware as soon as possible.

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.

Begin forwarded message:

From: "McCollum, Brian" <bmccollum@freepress.com>
Date: September 3, 2015 at 9:17:37 AM PDT
To: "alanelliott@ucla.edu" <alanelliott@ucla.edu>
Subject: FW: FOR IMMEDIATE RELEASE: ARETHA FRANKLIN FILES INJUNCTION AGAINST 'AMAZING GRACE' FILM

From: waldc@aol.com [<mailto:waldc@aol.com>]
Sent: Thursday, September 03, 2015 12:00 PM
To: McCollum, Brian <bmccollum@freepress.com>
Subject: Fwd: FOR IMMEDIATE RELEASE: ARETHA FRANKLIN FILES INJUNCTION AGAINST 'AMAZING GRACE' FILM

**FOR IMMEDIATE RELEASE: ARETHA FRANKLIN FILES AN INJUNCTION
AGAINST 'AMAZING GRACE' FILM**

**ARETHA FRANKLIN FILES AN
INJUNCTION AGAINST RELEASE OF 'AMAZING GRACE' FILM**

Detroit--Aretha Franklin has proceeded to file an injunction

against the release and showing of the film, "Amazing Grace."

Ms. Franklin says she is taking legal action "because the film holders refuse to compensate me for my name and likeness in the film."

The internationally-acclaimed singer has hired the Detroit law firm, Dykema Gossett.

The film shows the making of Ms. Franklin's landmark gospel album, 'Amazing Grace,' that she recorded in 1972. It remains the biggest selling gospel album of all time.

###

Media Contact: Clarence Waldron
CW Media
cwmedia24@gmail.com
773 859-0308

From: Joe Boyd boyd1j@yahoo.co.uk
Subject: Fw: 2700815 Amazing Grace
Date: July 15, 2015 at 1:36 AM
To: Alan Elliott alan@alanelliott.net



what news? Remind me about Matthew Farmer and why we should e-meet each other...?

J

----- Forwarded Message -----

From: Matthew Farmer <mifarmer0@gmail.com>
To: alan elliott (ucla) <alanelliott@g.ucla.edu>
Cc: Joe Boyd <boyd1j@yahoo.co.uk>
Sent: Monday, 13 July 2015, 18:44
Subject: Re: 2700815 Amazing Grace

Seems to be moving in the right direction.

On Mon, Jul 13, 2015 at 11:29 AM, alan elliott (ucla) <alanelliott@g.ucla.edu> wrote:

definitive.

(!!!)

(and this is my cyber introduction to you guys... you will like each other.)

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.

Begin forwarded message:

From: Stephen Carroll <stephen.carroll@aon.com>
Date: July 13, 2015 at 8:12:25 AM PDT
To: "alan elliott (ucla) (alanelliott@g.ucla.edu)" <alanelliott@g.ucla.edu>
Cc: Annette Shavuo <annette.shavuo@aon.com>
Subject: FW: 2700815 Amazing Grace

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](tel:212-337-4353)
New Cell: [914-588-4290](tel:914-588-4290)
Fax: [847-953-2692](tel: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 claim 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](tel:646.452.2355)
M [646.823.8092](tel:646.823.8092)
joanne.richardson@hiscox.com
Connect with Hiscox online
Web 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](tel:212-337-4353)
New Cell: [914-588-4290](tel:914-588-4290)
Fax: [847-953-2692](tel: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)

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. No one else is authorised to distribute, forward, print, copy or act upon any information contained in this email. If you have received this email in error, please notify the sender.

Hiscox Syndicates Ltd and Hiscox Insurance Company Ltd are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority. Hiscox Underwriting Limited, Hiscox Europe Underwriting Limited and Hiscox ASM Limited are authorised and regulated by the Financial Conduct Authority. Hiscox plc is a company registered in England and Wales under company registration number 2837811 and registered office at 1 Great St Helen's, London EC3A 6HX.

thank you.

phone: [323 988 9692](tel: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

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.

From: Jack Tanner Jtanner@fwlaw.com 
Subject: FW: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post
Date: September 8, 2015 at 2:57 PM
To: alan elliott (ucla) alanelliott@g.ucla.edu



Alan,

See below from my partner looking at coverage. You attached the application and the binder, but not the actual policy.

Thanks

Jack

From: Timothy E. Reilly
Sent: Tuesday, September 08, 2015 3:03 PM
To: Jack Tanner
Subject: FW: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post

Jack,

This is not the policy so we need the policy. Please request the policy. The email below references that it is conditional binder of coverage with the policy to be issued. The policy should have been issued (and received) by now.

Timothy E. Reilly
Fairfield and Woods, P.C.
Direct Dial: (303) 894-4449

From: Jack Tanner
Sent: Tuesday, September 08, 2015 2:03 PM
To: Timothy E. Reilly
Subject: FW: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Tuesday, September 08, 2015 1:52 PM
To: Jack Tanner
Subject: Fwd: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post

thank you.

phone: 323 988 9692

Sent from me.

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Date: July 22, 2015 at 12:32:48 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Cc: Stephen Carroll <stephen.carroll@aon.com>
Subject: FW: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post

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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.



Binder - EO -
15-18...ce.pdf

[154 KB](#)



App- REVISED
Q#22 -...03.doc

[Downloading...](#)

From: Annette Shavuo 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
Cc: Stephen Carroll 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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.



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

From: Stephen Carroll 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) alanelliott@g.ucla.edu
Cc: Annette Shavuo 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
Connect with Hiscox online
Web www.hiscoxbroker.com
Twitter [@Hiscox_USA](https://twitter.com/Hiscox_USA)





image003.png

[Downloading...](#)

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)

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. No one else is authorised to distribute, forward, print, copy or act upon any information contained in this email. If you have received this email in error, please notify the sender.

Hiscox Syndicates Ltd and Hiscox Insurance Company Ltd are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority. Hiscox Underwriting Limited, Hiscox Europe Underwriting Limited and Hiscox ASM Limited are authorised and regulated by the Financial Conduct Authority. Hiscox plc is a company registered in England and Wales under company registration number 2837811 and registered office at 1 Great St Helen's, London EC3A 6HX.



4-1-1968

Aretha...ts).pdf

[Downloading...](#)

thank you

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.

From: Annette Shavuo annette.shavuo@aon.com 
Subject: FW: amazing grace confirmation
Date: July 20, 2015 at 1:27 PM
To: 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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

From: Amanda Roytbak
Sent: Tuesday, July 14, 2015 2:31 PM
To: 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

This message is intended only for the named recipient and may contain confidential, proprietary or legally privileged information. Unauthorized individuals or entities are not permitted access to this information. Any dissemination, distribution, or copying of this information is strictly prohibited. If you have received this message in error, please advise the sender by reply e-mail, and delete this message and any attachments.

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

julie iss cc'd here.

thank you.

-alan

phone: 323 988 9692

This email 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.

On Jul 14, 2015, at 11:13 AM, Amanda Roytbak <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

From: **Annette Shavuo** annette.shavuo@aon.com 
Subject: FW: Amazing Grace- E&O
Date: July 8, 2015 at 12:35 PM
To: 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.

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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

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)

This email 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, disseminating, distributing, republishing, or otherwise using the information contained herein.

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.

On Mar 4, 2015, at 12:25 PM, Stephen Carroll
<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

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.

On Feb 27, 2015, at 1:42 PM, Stephen Carroll
<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> 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: [914-589-2600](tel:914-589-2600)

Fax: [047-955-2092](tel:047-955-2092)

<Amazing Grace Hiscox Quote.PDF>



QDR AGR
Strateg...1 v2.xls

From: Stephen Carroll 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) alanelliott@g.ucla.edu
Cc: Annette Shavuo 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

This email 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.

On Aug 31, 2015, at 9:26 AM, Stephen Carroll <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

This email 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

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.

Begin forwarded message:

From: alan elliott (ucla) <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>, "Todd W. Musburger" <todd@musburger.com>
Cc: Liesl Copland <LCopland@wmeentertainment.com>, "Todd W. Musburger" <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

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. No one else is authorised to distribute, forward, print, copy or act upon any information contained in this email. If you have received this email in error, please notify the sender.

Hiscox Syndicates Ltd and Hiscox Insurance Company Ltd are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority. Hiscox Underwriting Limited, Hiscox Europe Underwriting Limited and Hiscox ASM Limited are authorised and regulated by the Financial Conduct Authority. Hiscox plc is a company registered in England and Wales under company registration number 2837811 and registered office at 1 Great St Helen's, London EC3A 6HX.



The Rights Workshop, Inc.
1800 Bryant Street, Suite 104
San Francisco, CA 94110

(415) 561-3333
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	• Music license fees • Holy Holy, How I Got Over, Precious Lord Take My Hand, You've Got a Friend, My Sweet Lord, • Old Landmark, Mary Don't You Weep	7	500.00	3,500.00
			Total	\$5,250.00

Thank you for your business. Please note Federal ID#: 42-1655690.

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: hiscox letter
Date: January 22, 2016 at 10:36 AM
To: joe boren joe.boren@ironshore.com



Amazing Grace
- Frank...OC.pdf

thank you.

-alan

phone: [323 988 9692](tel:3239889692)
peace and love.

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: hiscox letter post lawsuit aretha
Date: February 28, 2017 at 11:47 AM
To: Kenneth Freundlich ken@freundlichlaw.com



Amazing Grace
- Frank...OC.pdf

thank you.

-alan

phone: [323 988 9692](tel:3239889692)
peace and love.

<http://songsoundrecord.tumblr.com>

From: Alan Elliott alanelliott@concordbicycle.com 
Subject: hiscox/aretha franklin/amazing grace
Date: September 8, 2017 at 2:27 PM
To: Nelson Hsieh nhsieh@gpsllp.com



Hiscox_Amazing
Grace...17).pdf

thank you.

-alan

phone: 323 988 9692

peace and love.



From: Stephen Carroll stephen.carroll@aon.com 
Subject: RE: insurance needed!
Date: February 2, 2015 at 9:57 AM
To: Alan Elliott 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

This email 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.



Video Film and
Televisi...03.doc

271 KB

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Fwd: insurance needed!
Date: February 2, 2015 at 10:03 AM
To: Todd W. Musburger todd@musburger.com



fyi

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.

Begin forwarded message:

From: Stephen Carroll <stephen.carroll@aon.com>
Date: February 2, 2015 at 9:57:52 AM PST
To: Alan Elliott <alanelliott@ucla.edu>
Subject: RE: insurance needed!

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

This email transmission, including any previous messages or attachments to it, contains information that may be

This email 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.



Video Film and
Televisi...03.doc

271 KB

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Re: insurance needed!
Date: February 2, 2015 at 12:02 PM
To: John q john@passion-pictures.com
Cc: Alan Elliott alanelliott@ucla.edu



feel better.

that sickness is wicked...

On Feb 2, 2015, at 9:48 AM, John Battsek <john@passion-pictures.com> wrote:

Allan

Sorry for the silence I'm just back from Sundance and sick as a dog. As soon as I am 100% again I will be on the case... In the meantime..

<http://variety.com/2015/film/reviews/sundance-film-review-listen-to-me-marlon-1201420110/>

"In Stevan Riley's impressive documentary, we have Brando's own voice, and an extraordinary visual journey through the actor's life and work, revealing a complex troubled man"

"Listen To Me Marlon is an elegy, with scenes of extraordinary beauty throughout..."

SCREEN DAILY – February 1, 2015 – "Listen To Me Marlon" (positive review) by David D'Arcy
<http://www.screendaily.com/reviews/the-latest/listen-to-me-marlon/5082518.article?blocktitle=REVIEWS&contentID=40296> \

JOHN BATTSEK
PRODUCER - MD

3rd Floor
Kirkman House
12-14 Whitfield Street
LONDON W1T 2RF
+44 (0)20 7323 9933
+44 (0)7770 920 064
+1 646 248 2605
PASSION-PICTURES.COM



From: Alan Elliott <alanelliott@ucla.edu>
Date: Mon, 2 Feb 2015 09:37:05 -0800
To: <Stephen.carroll@aon.com>, <Ramona.horne@aon.com>
Cc: George Chignell <georgec@passion-pictures.com>, Office 2004 Test Drive User <john@passion-pictures.com>, Joe Boyd <boyd1j@yahoo.co.uk>
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

cnigneri suggested we start.

how do we start?

thank you.

-alan

phone: 323 988 9692

This email 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.

Registered Address: Passion Pictures Ltd, 33-34 Rathbone Place, London W1T 1JN.

Registration number: 2177709. Registered in England & Wales

Disclaimer

This message (and any associated files) is intended only for the use of the individual or entity to which it is addressed and may contain information that is confidential, subject to copyright or constitutes a trade secret. If you are not the intended recipient you are hereby notified that any dissemination, copying or distribution of this message, or files associated with this message, is strictly prohibited. If you have received this message in error, please notify us immediately by replying to the message and deleting it from your computer. Messages sent to and from us may be monitored.

Internet communications cannot be guaranteed to be secure or error-free as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete, or contain viruses. Therefore, we do not accept responsibility for any errors or omissions that are present in this message, or any attachment, that have arisen as a result of e-mail transmission. If verification is required, please request a hard-copy version. Any views or opinions presented are solely those of the author and do not necessarily represent those of the company.

From: Alan Elliott alanelliott@ucla.edu

Subject: insurance needed!

Date: February 2, 2015 at 9:37 AM

To: Stephen.carroll@aon.com, Ramona.horne@aon.com

Cc: George Chignell georgec@passion-pictures.com, john battsek john@passion-pictures.com, Joe Boyd boyd1j@yahoo.co.uk



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

This email 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.

From: Alan Elliott alanelliott@ucla.edu

Subject: insurance needed!

Date: February 2, 2015 at 9:36 AM

To: Stephen.carroll@aon.com, Ramona.horne@aon.com

Cc: George Chignell georgec@passion-pictures.com, John Battsek john@passion-pictures.com, Joe Boyd boyd1j@yahoo.co.uk



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

This email 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.

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: insurance on all sides needs to be informed.
Date: September 4, 2015 at 12:13 PM



To: Linda Lichter llichter@ligna.com, Todd W. Musburger todd@musburger.com
Cc: Tom Luddy tom.luddy@gmail.com, Julie Huntsinger juliehuntsinger@me.com, Matt Farmer mifarmer0@gmail.com,
Stephen Carroll stephen.carroll@aon.com

my insurance company... And my friend Matt Farmer, litigator,... Want to make sure that all sides have reported everything to our respective insurance companies.

hiscox, who is my insurance through stephen carroll (ccd here) knows everything. But they have pointed out... That I am not named on the suit. And that the telluride insurance company needs to be aware.

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.

From: alan elliott (ucla) alanelliott@g.ucla.edu

Subject: insurance PRIOR to hiscox...

Date: June 26, 2017 at 1:13 PM

To: Maria Clark maria.clark@aon.com, laura comerford laura.comerford@aon.com



was with chubb.

hiscox is kicking me there.

thank you.

-alan

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

peace and love.

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: insurance proposal...
Date: February 23, 2016 at 4:59 PM
To: Shaun H. Crosner scrosner@linerlaw.com



T&D Insurance
Propos...O.PDF

thank you.

-alan

phone: 323 988 9692
peace and love.

<http://songsoundrecord.tumblr.com>

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Re: joe boren/amazing grace
Date: January 26, 2016 at 4:51 PM
To: Tal C. Finney TFinney@weintraub.com



hi tal

basically, i had an insurance contract with hiscox for my film "amazing grace."

the film concerns the making of the album of the same name by aretha franklin.

i got a quitclaim from warner seven arts in 2007. ms. franklin had a personal service contract with warner seven arts (the company from whom i had quit claim). warners could not find the contract as they sold their record company, and could not locate the contract. they would find the contract and give it to me in 2013.

in 2011, ms. franklin sued me.

not having the contract, i agreed to not show the film in a private (not court mandated) settlement.

in 2013, when i received the contract, my lawyers and i told ms. franklin's reps that the settlement was now null and void as i had her contract.

in 2015, i was invited to the telluride and toronto film festivals and so i went to get insurance.

i had stephen carroll of aol get a policy from hiscox and i had in depth conversations with hiscox's attorney ted gerdes and with hiscox's joanne richardson and mr. carroll to walk them through the above.

i went to telluride and was sued by ms. franklin.

hiscox initially covered the policy, but later, after admitting they had all the information, claim that i should be covered.

the film is worth, it is estimated, between \$10m- \$20m.

i have an offer for \$2.3m cash upfront from lionsgate films currently.

i believe the lack of insurance will cost me, over the life of the 27 year contract proposed, approx. \$10m.

thank you.

-alan



Amazing Grace
- Frank...OC.pdf

phone: 323 988 9692
peace and love.

<http://songsoundrecord.tumblr.com>

On Jan 26, 2016, at 4:26 PM, Tal C. Finney <TFinney@weintraub.com> wrote:

Hi Alan –

We have contacts for a potential referral but could you please provide us with a short email with some of the facts associated with the matter? Maybe the size and nature of the claim, that type of thing. It will help us with the referral. I'm disappointed that we can't take the case. Again, insurers are extremely hard-lined about not allowing their empaneled defense counsel sue them for coverage on behalf of a plaintiff.

Best regards,

Tal

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Monday, January 25, 2016 7:10 PM
To: Tal C. Finney
Subject: Re: joe boren/amazing grace

I am sorry to read this.

please let me know about a referral asap.

thank you.

-alan

phone: 323 988 9692
peace and love.

On Jan 25, 2016, at 5:25 PM, Tal C. Finney <TFinney@weintraub.com> wrote:

Hi Alan,

Sorry for adding David Giannotti to the email. He is an environmental lawyer that is an of counsel so no confidences breached by the auto-spell and then sending before catching that he had been mistakenly added.

Again, I'm working on finding you a referral that would likely not have a conflict.

Best regards,

Tal Finney

From: Tal C. Finney
Sent: Monday, January 25, 2016 5:17 PM
To: 'alan elliott (ucla)'
Cc: David A. Giannotti (david@dagiannotti.com)
Subject: RE: joe boren/amazing grace

Hi Alan,

The insurer is not in favor of granting a conflict waiver of our law firm given that we have active defense cases with them as defense panel counsel. We gave it our best shot, but it's something of a cardinal sin in the insurance industry if active defense panel counsel. I'm checking with my entertainment litigators for another potential referral.

We appreciate your interest and reaching out and are available to discuss future potential representation of course.

Best regards,

Tal Finney
Of Weintraub Tobin Chediak Coleman & Grodin

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Monday, January 25, 2016 2:08 PM
To: Tal C. Finney
Subject: Re: joe boren/amazing grace

hey tal

checking in to see what, if any, are possibilities.

thank you.

-alan

phone: 323 988 9692
peace and love.

On Jan 22, 2016, at 1:38 PM, Tal C. Finney <TFinney@weintraub.com> wrote:

Great - will do

Sent from my iPhone

On Jan 22, 2016, at 1:38 PM, alan elliott (ucla) <alanelliott@g.ucla.edu> wrote:

yes.

thank you.

-alan

phone: 323 988 9692
peace and love.

On Jan 22, 2016, at 1:37 PM, Tal C. Finney <TFinney@weintraub.com> wrote:

Hi Allen --

Apparently, we represent Hiscox in two defense matters so could represent you in conjunction with the coverage challenge but would have to have a conflict waiver letter from them. Are you open to us asking for this?

Best,

Tal

Sent from my iPhone

On Jan 22, 2016, at 10:42 AM, alan elliott (ucla) <alanelliott@g.ucla.edu> wrote:

hi tal

I am gonna call you in a few. below is the letter from hiscox that we can discuss.

<Amazing Grace - Franklin DOC.pdf>

thank you.

-alan

phone: [323.988.9692](tel:323.988.9692)
peace and love.

weintraub | tobin

weintraub tobin chediak coleman grodin law corporation

9665 Wilshire Blvd, Suite 900, Beverly Hills, CA 90212 | 310.858.7888 | www.weintraub.com
Beverly Hills | Newport Beach | Sacramento | San Diego | San Francisco

IRS CIRCULAR 230 DISCLOSURE: To ensure compliance with requirements imposed by the Internal Revenue Service, we inform you that any U.S. tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code or (ii) promoting, marketing or recommending to another party any transaction or matter addressed herein.

Privileged/Confidential Information may be contained in this message. If you are not the addressee indicated in this message (or responsible for delivery of the message to such person), you may not copy or deliver this message to anyone. In such case, you should destroy this message and kindly notify the sender by reply email. Please advise immediately if you or your employer does not consent to Internet email for messages of this kind. Opinions, conclusions and other information in this message that do not relate to the official business of my firm shall be understood as neither given nor endorsed by it.

</HTML

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: larry blake info:
Date: July 8, 2016 at 2:03 PM
To: Stephen Carroll stephen.carroll@aon.com
Cc: Larry Blake Larry.Blake@concordmusicgroup.com



Larry Blake <Larry.Blake@concordmusicgroup.com>

310 385 4205

thank you.

-alan

phone: 323 988 9692
peace and love.

<http://songsoundrecord.tumblr.com>

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: letter sent to hiscox.
Date: July 18, 2017 at 5:15 PM
To:



Dear Laura

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

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 this type of volatility as demonstrated by Ms. Franklin.

Further, the turbulent nature of Ms. Franklin's 2011 lawsuit was THE SINGULAR FUNDAMENTAL upon which every conversation with Hiscox/AON was based. Insurance would allow me to defend and enforce Ms. Franklin recently discovered (in 2013) Warner Films' personal service contract.

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. In fact, the pdf of the "cease and desist" settlement that resulted from the 2011 lawsuit was provided to all parties as part of the application and is included in multiple emails.

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 in fact helped craft that answer and Hiscox is not correct in declining. The answer was discussed and deliberated with Hiscox through Joanne Richardson, with Hiscox's counsel Ted Gerdes and with AON's Stephen Carroll and Annette Shavuo.

Because of the 2013 discover of the personal service contract, AON/Hiscox vetted the contract and when the question came up- EVERYONE was aware of the prior issues and that they were satisfied that solidity of the personal service contract and that was evinced in the answer.

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 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.

Most importantly though, 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.

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>
Subject: amazing grace; 27700815
Date: May 8, 2017 at 1:56:22 PM PDT
To: Stephen Carroll <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: Annette Shavuo 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



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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

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

This email 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.

On Jul 21, 2015, at 8:37 AM, Annette Shavuo <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

Before you print, think about the ENVIRONMENT 🌱

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

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



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.

On Jul 20, 2015, at 2:10 PM, Annette Shavuo <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

Before you print, think about the ENVIRONMENT 🌱

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

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

This email 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.

Begin forwarded message:

From: Julie Huntsinger <juliehuntsinger@me.com>
Subject: Re: amazina arace confirmation

~~Subject: Re: amazing grace commitee~~

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

To: "alan elliott (ucla)" <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
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> wrote:

hey Julie

Can you pls see if this is en route?

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.

Begin forwarded message:

From: Annette Shavuo <annette.shavuo@aon.com>
Date: July 20, 2015 at 1:27:21 PM PDT
To: "alanelliott@g.ucla.edu" <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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

From: Amanda Roytbak
Sent: Tuesday, July 14, 2015 2:31 PM
To: 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

This message is intended only for the named recipient and may contain confidential, proprietary or legally privileged information. Unauthorized individuals or entities are not permitted access to this information. Any dissemination, distribution, or copying of this information is strictly prohibited. If you have received this message in error, please advise the sender by reply e-mail, and delete this message and any attachments.

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

julie iss cc'd here.

thank you.

-alan

phone: 323 988 9692

This email 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.

On Jul 14, 2015, at 11:13 AM, Amanda Roytbak <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](#)

<E&O Invoice - Choices.pdf>

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: may, 2017 hiscox letter and answer from counsel...
Date: September 8, 2017 at 2:38 PM
To: Nelson Hsieh nhsieh@gpsllp.com



via broker laura comerford:

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 this discussion, we specifically reviewed the 2011 lawsuit and the 2013 contract with both Hiscox (Ted Gerdes) and AON when considering how to answer the question. The answer was discussed and deliberated with Hiscox through Joanne Richardson, with Hiscox's counsel Ted Gerdes and with AON's Stephen Carroll and Annette Shavuo.

Because of the 2013 discover of the personal service contract, AON/Hiscox vetted the contract and when the question came up- EVERYONE was aware of the prior issues and that they were satisfied that solidity of the personal service contract and that 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.

Hiscox directed me to discuss these matters with Ted Gerdes, I specifically told Mr. Gerdes about the 2011 lawsuit, provided him with links in emails to the lawsuit and this lawsuit was THE SINGULAR FUNDAMENTAL upon which every conversation with Hiscox was based. Insurance would allow me to defend and enforce Ms. Franklin's contract which was recently discovered (in 2013) by Warner Films.

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. In fact, the pdf of the "cease and desist" settlement that resulted from the 2011 lawsuit was provided to all parties as part of the application and is included in multiple emails.

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 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.

Most importantly though all communications were done with knowledge by Hiscox/AON that the personal

Most importantly though, all communications were done with knowledge by Hiscox 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.



Hiscox_Amazing
Grace...7).PDF

thank you.

-alan

phone: 323 988 9692

peace and love.

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: may, 2017 hiscox letter and answer from counsel...
Date: July 18, 2017 at 5:20 PM
To: Chad Milton cemilton@mediariskconsultants.com



via broker laura comerford:

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 this discussion, we specifically reviewed the 2011 lawsuit and the 2013 contract with both Hiscox (Ted Gerdes) and AON when considering how to answer the question. The answer was discussed and deliberated with Hiscox through Joanne Richardson, with Hiscox's counsel Ted Gerdes and with AON's Stephen Carroll and Annette Shavuo.

Because of the 2013 discover of the personal service contract, AON/Hiscox vetted the contract and when the question came up- EVERYONE was aware of the prior issues and that they were satisfied that solidity of the personal service contract and that 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.

Hiscox directed me to discuss these matters with Ted Gerdes, I specifically told Mr. Gerdes about the 2011 lawsuit, provided him with links in emails to the lawsuit and this lawsuit was THE SINGULAR FUNDAMENTAL upon which every conversation with Hiscox was based. Insurance would allow me to defend and enforce Ms. Franklin's contract which was recently discovered (in 2013) by Warner Films.

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. In fact, the pdf of the "cease and desist" settlement that resulted from the 2011 lawsuit was provided to all parties as part of the application and is included in multiple emails.

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 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.

Most importantly though all communications were done with knowledge by Hiscox/AON that the personal

Most importantly though, all communications were done with knowledge by Hiscox 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.



Hiscox_Amazing
Grace...7).PDF

thank you.

-alan

phone: 323 988 9692

peace and love.

From: ALAN ELLIOTT alanelliott@g.ucla.edu
Subject: Re: please take a look- and if you have notes/deletions... please tell me.
Date: March 14, 2016 at 2:17 PM
To: Shaun H. Crosner scrosner@linerlaw.com



we may be closer to an aretha agreement with lionsgate.

i have submitted to the broker (the original broker, winnie wong at mmibi) and have yet to hear back.

thank you.

-alan

phone: 323 988 9692
peace and love.

<http://songsoundrecord.tumblr.com>

On Mar 14, 2016, at 2:09 PM, Shaun H. Crosner <scrosner@linerlaw.com> wrote:

Hi Alan,

Hope all is well. I wanted to check in to see if there are any updates regarding either Chubb or the ongoing negotiations with Aretha Franklin.

Best,
Shaun

Shaun H. Crosner, Esq.
Liner LLP
Direct: 310.500.3352
scrosner@linerlaw.com

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Wednesday, March 02, 2016 1:09 PM
To: Shaun H. Crosner
Subject: Fwd: please take a look- and if you have notes/deletions... please tell me.

thank you.

-alan

phone: 323 988 9692
peace and love.

<http://songsoundrecord.tumblr.com>

Begin forwarded message:

From: alan elliott (ucla) <alanelliott@g.ucla.edu>
Subject: please take a look- and if you have notes/deletions... please tell me.
Date: March 2, 2016 at 1:08:19 PM PST
To: Stephen Carroll <stephen.carroll@aon.com>

hi stephen

i would like to put the chubb group policy (that i had prior to the current hiscox policy) on notice as the lawsuit still outstanding from telluride is an extension of the original lawsuit filed while i was under cover at chubb.

in hiscox's letter excluding aretha franklin's

"Based on this information, we are regrettably constrained to conclude that there is no coverage under the Hiscox/Amazing Grace policy for Ms. Franklin's claims against you. Specifically, because Ms. Franklin had filed suit against you regarding this matter in 2011, several years before the policy was issued, the policy does not afford cover.

...

Ms. Franklin's recent complaint is based on the same circumstances and decisions as the August 2011 complaint—the decision to screen the film without Ms.

Franklin's authorization. Thus, because the August 2011 complaint was filed prior to the inception date, the current complaint is not covered."

if this is how i am to play it, i had coverage (see below attached) with chubb and i would like to see if chubb will give me coverage asap as i have a possible pending court date in denver on march 10.

thank you.

-alan

phone: 323 988 9692

This email 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.

Begin forwarded message:

From: Randy Tyrrel <RTyrrel@mmibi.com>

Date: January 21, 2010 9:09:31 AM PST

To: Alan Elliott <alan@alanelliott.net>

Cc: Winnie Wong <WWong@mmibi.com>

Subject: Al's Records and Tapes - "Amazing Grace" E&O Policy

Hi Alan,

Attached please find the above captioned policy effective 11/09/09 to 11/09/12. Please review for complete limits, deductibles, terms, conditions, exclusions and endorsements and advise if any changes are in order.

The premium for this policy has been paid in full, thank you.

If you have questions regarding this or any other matter, please contact our office. Thank you for allowing Momentous Insurance Brokerage, Inc. to be of service.

Sincerely,

Randy Tyrrel
Account Manager
Momentous Insurance Brokerage, Inc.
5990 Sepulveda Blvd. Suite 550
Van Nuys, CA 91411
P: 818.933.9874 / F: 818.933.9894
E: RTyrrel@mmibi.com
www.momentousins.com
Lic. #0G19762

<image001.jpg>

thank you.

-alan

phone: 323 988 9692

peace and love.

<http://songsoundrecord.tumblr.com>

We love referrals. If you have any contacts in need of personal, commercial, entertainment, life, health or disability insurance, please forward our information. Thank you!

This email and any files transmitted with it are confidential and are intended solely for the use of the individual or entity to whom they are

addressed and may be legally privileged. If you are NOT the intended recipient or the person responsible for delivering this email to the intended recipient, be advised that you have received this email in error and that any use, dissemination, forwarding, printing, or copying of this email is strictly prohibited. Momentous Insurance Brokerage, Inc., and/or its subsidiaries is neither liable for the proper and complete transmission of the information contained in this communication nor for any delay in its receipt.

From: Shaun H. Crosner scrosner@linerlaw.com 
Subject: RE: please take a look- and if you have notes/deletions... please tell me.
Date: March 14, 2016 at 2:09 PM
To: alan elliott (ucla) alanelliott@g.ucla.edu

Hi Alan,

Hope all is well. I wanted to check in to see if there are any updates regarding either Chubb or the ongoing negotiations with Aretha Franklin.

Best,
Shaun

Shaun H. Crosner, Esq.
Liner LLP
Direct: 310.500.3352
scrosner@linerlaw.com

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Wednesday, March 02, 2016 1:09 PM
To: Shaun H. Crosner
Subject: Fwd: please take a look- and if you have notes/deletions... please tell me.

thank you.

-alan

phone: 323 988 9692
peace and love.

<http://songsoundrecord.tumblr.com>

Begin forwarded message:

From: alan elliott (ucla) <alanelliott@g.ucla.edu>
Subject: please take a look- and if you have notes/deletions... please tell me.
Date: March 2, 2016 at 1:08:19 PM PST
To: Stephen Carroll <stephen.carroll@aon.com>

hi stephen

i would like to put the chubb group policy (that i had prior to the current hiscox policy) on notice as the lawsuit still outstanding from telluride is an extension of the original lawsuit filed while i was under cover at chubb.

in hiscox's letter excluding aretha franklin's

"Based on this information, we are regrettably constrained to conclude that there is no coverage under the Hiscox/Amazing Grace policy for Ms. Franklin's claims against you. Specifically, because Ms. Franklin had filed suit against you regarding this matter in 2011, several years before the policy was issued, the policy does not afford cover.

...
Ms. Franklin's recent complaint is based on the same circumstances and decisions as the August 2011 complaint—the decision to screen the film without Ms. Franklin's authorization. Thus, because the August 2011 complaint was filed prior to the inception date, the current complaint is not covered."

if this is how i am to play it, i had coverage (see below attached) with chubb and i would like to see if chubb will give me coverage asap as i have a possible pending court date in denver on march 10.

thank you.

-alan

phone: 323 988 9692

This email 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.

Begin forwarded message:

From: Randy Tyrrel <RTyrrel@mmibi.com>

Date: January 21, 2010 9:09:31 AM PST

To: Alan Elliott <alan@alanelliott.net>

Cc: Winnie Wong <WWong@mmibi.com>

Subject: AI's Records and Tapes - "Amazing Grace" E&O Policy

Hi Alan,

Attached please find the above captioned policy effective 11/09/09 to 11/09/12. Please review for complete limits, deductibles, terms, conditions, exclusions and endorsements and advise if any changes are in order.

The premium for this policy has been paid in full, thank you.

If you have questions regarding this or any other matter, please contact our office. Thank you for allowing Mementous Insurance Brokerage, Inc. to be of

office. Thank you for allowing Momentous Insurance Brokerage, Inc. to be of service.

Sincerely,

Randy Tyrrel
Account Manager
Momentous Insurance Brokerage, Inc.
5990 Sepulveda Blvd. Suite 550
Van Nuys, CA 91411
P: 818.933.9874 / F: 818.933.9894
E: RTyrrel@mmibi.com
www.momentousins.com
Lic. #0G19762



thank you.

-alan

phone: 323 988 9692

peace and love.

<http://songsoundrecord.tumblr.com>

We love referrals. If you have any contacts in need of personal, commercial, entertainment, life, health or disability insurance, please forward our information. Thank you!

This email and any files transmitted with it are confidential and are intended solely for the use of the individual or entity to whom they are addressed and may be legally privileged. If you are NOT the intended recipient or the person responsible for delivering this email to the intended recipient, be advised that you have received this email in error and that any use, dissemination, forwarding, printing, or copying of this email is strictly prohibited. Momentous Insurance Brokerage, Inc., and/or its subsidiaries is neither liable for the proper and complete transmission of the information contained in this communication nor for any delay in its receipt.

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: stock shots exclusion removal for amazing grace...
Date: August 28, 2015 at 12:22 PM



To: Annette Shavuo annette.shavuo@aon.com, Stephen Carroll Stephen.carroll@aon.com
Cc: Todd W. Musburger todd@musburger.com, Liesl Copland LCopland@wmeentertainment.com

hi guys
 Re: 2700815 Amazing Grace LLC
 we need to get rid of the exclusions for:
 stock shots.
 attached is the invoice and we have the clips now.

gettyimages


 thank you.
 -alan

Thanks for your order If you have any questions, call us toll free at 800-IMAGERY (800-462-4379).

Sales order number: 14938832

Not yet available

Reference information																																																																															
Sales order number: 14938832																																																																															
Sales order date: August 27, 2015																																																																															
Payment method: Credit card																																																																															
Job or project title: AMAZING GRACE FILM																																																																															
Ordered by: ALAN ELLIOT																																																																															
End client: ALAN ELLIOT																																																																															
Licensed to: ALAN ELLIOT																																																																															
Bill to J W BOYD amazing grace film 217 THOMPSON ST NEW YORK, NY 10012 United States alanelliott@ucla.edu																																																																															
License agreements																																																																															
Contact us																																																																															
	<table border="1"> <tbody> <tr> <td></td> <td>Clip #: 86296671</td> <td>Price \$ 750.00 USD</td> </tr> <tr> <td></td> <td>License type: Rights-ready</td> <td></td> </tr> <tr> <td></td> <td>Filmmaker: L.A. County</td> <td></td> </tr> <tr> <td></td> <td>Collection: Archive Films: Creative</td> <td></td> </tr> <tr> <td></td> <td>Delivery method: Download by customer</td> <td>Price \$ 750.00 USD</td> </tr> <tr> <td></td> <td>Release info: No model or property releases required for this clip; however, releases may not be required for commercial use. Click here for more information.</td> <td></td> </tr> <tr> <td></td> <td>Resolution: SD 720x486 @ 29.97 fps NTSC</td> <td>Price \$ 750.00 USD</td> </tr> <tr> <td></td> <td>Clip #: 978-64</td> <td></td> </tr> <tr> <td></td> <td>License type: Rights-ready</td> <td></td> </tr> <tr> <td></td> <td>Filmmaker: Universal Studios</td> <td></td> </tr> <tr> <td></td> <td>Collection: Universal Studios</td> <td></td> </tr> <tr> <td></td> <td>Delivery method: Download by customer</td> <td></td> </tr> <tr> <td></td> <td>Release info: No model or property releases have been obtained for this clip; however, releases may not be required for commercial use. Click here for more information.</td> <td></td> </tr> <tr> <td></td> <td>Resolution: HD 1920x1080 @ 24p Progressive (HD)</td> <td></td> </tr> <tr> <td></td> <td>Clip #: 86296672</td> <td></td> </tr> <tr> <td></td> <td>License type: Rights-ready</td> <td></td> </tr> <tr> <td></td> <td>Filmmaker: L.A. County</td> <td></td> </tr> <tr> <td></td> <td>Collection: Archive Films: Creative</td> <td></td> </tr> <tr> <td></td> <td>Delivery method: Download by customer</td> <td></td> </tr> <tr> <td></td> <td>Release info: No model or property releases have been obtained for this clip; however, releases may not be required for commercial use. Click here for more information.</td> <td></td> </tr> <tr> <td></td> <td>Use: Media uses: Documentary, news, editorial and educational</td> <td></td> </tr> <tr> <td></td> <td>Use definition: Use in one production or program. Not intended for commercial or promotional purposes. This license includes the right to distribute the production in its final form in all media now known or hereafter devised throughout the world in perpetuity. For documentary film trailers and promotions, please refer to "Media, editorial & entertainment uses: Feature film trailer."</td> <td></td> </tr> <tr> <td></td> <td>Resolution: SD 720x486 @ 29.97 fps NTSC</td> <td></td> </tr> <tr> <td></td> <td>Subtotal:</td> <td>\$ 2,250.00 USD</td> </tr> <tr> <td></td> <td>Shipping:</td> <td>\$ 0.00 USD</td> </tr> <tr> <td></td> <td>Tax:</td> <td>\$ 0.00 USD</td> </tr> </tbody> </table>		Clip #: 86296671	Price \$ 750.00 USD		License type: Rights-ready			Filmmaker: L.A. County			Collection: Archive Films: Creative			Delivery method: Download by customer	Price \$ 750.00 USD		Release info: No model or property releases required for this clip; however, releases may not be required for commercial use. Click here for more information.			Resolution: SD 720x486 @ 29.97 fps NTSC	Price \$ 750.00 USD		Clip #: 978-64			License type: Rights-ready			Filmmaker: Universal Studios			Collection: Universal Studios			Delivery method: Download by customer			Release info: No model or property releases have been obtained for this clip; however, releases may not be required for commercial use. Click here for more information.			Resolution: HD 1920x1080 @ 24p Progressive (HD)			Clip #: 86296672			License type: Rights-ready			Filmmaker: L.A. County			Collection: Archive Films: Creative			Delivery method: Download by customer			Release info: No model or property releases have been obtained for this clip; however, releases may not be required for commercial use. Click here for more information.			Use: Media uses: Documentary, news, editorial and educational			Use definition: Use in one production or program. Not intended for commercial or promotional purposes. This license includes the right to distribute the production in its final form in all media now known or hereafter devised throughout the world in perpetuity. For documentary film trailers and promotions, please refer to "Media, editorial & entertainment uses: Feature film trailer."			Resolution: SD 720x486 @ 29.97 fps NTSC			Subtotal:	\$ 2,250.00 USD		Shipping:	\$ 0.00 USD		Tax:	\$ 0.00 USD
	Clip #: 86296671	Price \$ 750.00 USD																																																																													
	License type: Rights-ready																																																																														
	Filmmaker: L.A. County																																																																														
	Collection: Archive Films: Creative																																																																														
	Delivery method: Download by customer	Price \$ 750.00 USD																																																																													
	Release info: No model or property releases required for this clip; however, releases may not be required for commercial use. Click here for more information.																																																																														
	Resolution: SD 720x486 @ 29.97 fps NTSC	Price \$ 750.00 USD																																																																													
	Clip #: 978-64																																																																														
	License type: Rights-ready																																																																														
	Filmmaker: Universal Studios																																																																														
	Collection: Universal Studios																																																																														
	Delivery method: Download by customer																																																																														
	Release info: No model or property releases have been obtained for this clip; however, releases may not be required for commercial use. Click here for more information.																																																																														
	Resolution: HD 1920x1080 @ 24p Progressive (HD)																																																																														
	Clip #: 86296672																																																																														
	License type: Rights-ready																																																																														
	Filmmaker: L.A. County																																																																														
	Collection: Archive Films: Creative																																																																														
	Delivery method: Download by customer																																																																														
	Release info: No model or property releases have been obtained for this clip; however, releases may not be required for commercial use. Click here for more information.																																																																														
	Use: Media uses: Documentary, news, editorial and educational																																																																														
	Use definition: Use in one production or program. Not intended for commercial or promotional purposes. This license includes the right to distribute the production in its final form in all media now known or hereafter devised throughout the world in perpetuity. For documentary film trailers and promotions, please refer to "Media, editorial & entertainment uses: Feature film trailer."																																																																														
	Resolution: SD 720x486 @ 29.97 fps NTSC																																																																														
	Subtotal:	\$ 2,250.00 USD																																																																													
	Shipping:	\$ 0.00 USD																																																																													
	Tax:	\$ 0.00 USD																																																																													

Total: \$ 2,250.00 USD

A separate invoice will be mailed to you at the address above.

This order is subject to the licensing and purchasing terms that you agreed to when you originally placed your order. You can view our [refund and return policy](#) at any time.

*Sales, VAT or other similar transactional taxes may be applied to an order depending on the product licensed and the State, Province and/or Country in which the delivery address is located. If you are paying with terms, you will receive an invoice in the mail detailing the actual tax applied. If you are paying by credit card, the actual tax applied will be included in the transaction amount that appears on your credit card statement. The total amount of the transaction appearing on your invoice or statement may vary slightly from the amount shown on your online purchase order and the initial order confirmation you receive via email. If you have any questions about our tax policy, please feel free to contact us.

Questions? Please call toll free at 800-IMAGERY (800-462-4379).

Thank you.

Have questions? Contact us

[Contact us](#)

Call us toll-free at 800 IMAGERY (800 462 4379)

All contents © copyright 1999-2015 Getty Images. All rights reserved.

[Terms of use](#)

[Privacy policy](#)

phone: 323 988 9692

This email 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@alanellcott.net.

On Aug 27, 2015, at 6:07 PM, Liesl Copland <LCopland@wmeentertainment.com> wrote:

I just got a call, did they email you Todd? They say the insurance stuff didn't pass their legal and they also need evidence of music clearance. I told them we were effectively partners with WB but that payments for festival were being made now but I wasn't sure what else they needed on the insurance thing. They need a legal opinion letter I think they said? Please advise

Liesl Copland | WME
LCopland@wmeentertainment.com
310.246.3383

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Fwd: sydney pollack
Date: July 8, 2016 at 1:56 PM
To: Larry Blake Larry.Blake@concordmusicgroup.com, Scott Pascucci scottpascucci@concordbicycle.com



thanks for the call.

fyi:

Begin forwarded message:

From: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Subject: sydney pollack
Date: March 1, 2016 at 9:50:32 AM PST
To: Stephen Carroll <stephen.carroll@aon.com>
Cc: "Todd W. Musburger" <todd@musburger.com>

Steve-

As we discussed just now on the phone, Barry Tyerman is the attorney for Sydney Pollack (Mr. Pollack passed away in May, 2008). Since I received the quitclaim from Warner Bros. in 2007, out of respect for the late Mr. Pollack, I have kept Mr. Tyerman updated on the film's progress. Out of respect, I have asked Mr. Tyerman what he would consider for additional payment for Mr. Pollack's heirs. Mr. Tyerman has, in these eight years, not given me an answer.

Mr. Tyerman asked me to remove Mr. Pollack's credit from the film prior to the Telluride Film Festival in September, 2015, I did so. As a potential deal for Aretha Franklin came, Mr. Tyerman asked for Mr. Pollack's heirs to be further compensated and so I want to tell you so that insurance is aware.

Over the years, I have repeatedly provided Mr. Tyerman with the following as proof of Warners' payment:

<http://alsrecordsandtapes.com/amazinglaw/wbdocs/wb%20legal%20pollack%20payment.pdf>

I have discussed the issue of Mr. Pollack and Mr. Tyerman's claim on behalf of Mr. Pollack with both Dan Furie, Warner Bros. Pictures, Business Affairs, and the President, Worldwide Business Affairs, Warner Bros. Pictures Steven S. Spira. Warners has provided me all documents re: Sydney Pollack. Mr. Tyerman has claimed that there may be a previous 1997 contract with Warners, he was asked for the contract but declined to show it. Warners has no copy of the agreement Mr. Tyerman talked of.

Both Mr. Spira and Mr. Furie they advised Mr. Tyerman that, according to all known documents, Mr. Pollack is not owed anything further. Mr. Spira said to me, "Mr. Tyerman asked us for money on this. I told him he had no cause. He is on a fishing expedition."

Other docs. with Sydney Pollack can be found at the web site (<http://alsrecordsandtapes.com/amazinglaw/wbdocs/>), including a general release for Mr. Pollack's image/likeness (which Mr. Pollack and his crew wrote):

<http://alsrecordsandtapes.com/amazinglaw/wbdocs/amazing%20releases%20church%20choir.pdf>

thank you.

-alan

phone: 323 988 9692

peace and love.

<http://songsoundrecord.tumblr.com>

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Fwd: Sydney Pollack; "Amazing Grace"
Date: June 9, 2016 at 4:04 PM
To: Shaun H. Crosner scrosner@linerlaw.com



thank you.
-alan

phone: 323 988 9692
peace and love.

<http://songsoundrecord.tumblr.com>

Begin forwarded message:

From: ALAN ELLIOTT <alanelliott@g.ucla.edu>
Subject: Fwd: Sydney Pollack; "Amazing Grace"
Date: April 26, 2016 at 1:36:18 PM PDT
To: Stephen Carroll <Stephen.carroll@aon.com>
Cc: "Todd W. Musburger" <todd@musburger.com>

hi stephen

as i am obliged to report all possible claims... here's a continuation.

thank you.
-alan

phone: 323 988 9692
peace and love.

<http://songsoundrecord.tumblr.com>

Begin forwarded message:

From: "Tyerman, Barry" <BTyerman@twamm.com>
Subject: Sydney Pollack; "Amazing Grace"
Date: April 26, 2016 at 1:29:06 PM PDT
To: Tom McGuire <TMcGuire@wmeentertainment.com>
Cc: "alan elliott (ucla)" <alanelliott@g.ucla.edu>, linda burrow <burrow@caldwell-leslie.com>, Liesl Copland <LCopland@wmeentertainment.com>, "Todd Musburger (todd@musburger.com)" <todd@musburger.com>

Tom,

I do not want you to be left with some false sense that our clients are any less committed to pursuing any and all claims and all legal, equitable and administrative remedies to protect the right of use of his name, likeness or the results and proceeds of his services.

Understandably we are not interested in litigating the legal foundation for those claims in correspondence and it is not the duty of the Pollack parties to correct Ms. Burrow's flawed analysis serious violations of Directors Guild of America creative, economic and other provisions applicable to this project; infringement of Mr. Pollack's droit moral and intellectual property rights

It is indisputable that Mr. Elliott, without any authorization from our clients whatsoever, has FOR YEARS been trading openly and brazenly on the Sydney Pollack name, iconic body of film

Mr. Elliott and his representatives have been repeatedly admonished to discontinue misrepresenting to any party that he has any authorization whatsoever from or on behalf of Sydney Pollack all available remedies to protect his economic, personal and creative rights and interests, including against any and all parties in the chain of infringement of our clients' rights.

On a personal note, although I know you are seriously conflicted about your role in this matter, I am disappointed that you without explanation reversed your position, as it was clear to me

In any event, please be advised that the Sydney Pollack rights and claims will not simply go away and our clients are fully committed to whatever litigation or other course of action may be

Very truly yours,

Barry Tyerman

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448
Email: BTyerman@twamm.com

From: Tom McGuire [<mailto:TMcGuire@wmeentertainment.com>]
Sent: Friday, April 08, 2016 11:59 AM
To: Tyerman, Barry
Cc: alan elliott (ucla) (alanelliott@g.ucla.edu); linda burrow; Liesl Copland; Todd Musburger (todd@musburger.com)
Subject: RE: Sydney Pollack; "Amazing Grace"

Barry,

In response to your email below, at this time I am not authorized to give you the financial details of this project. We urge you to respond to Linda Burrow's letter to you from a few weeks back. We are

Thank you.

Tom

Tom McGuire | WME
TMcGuire@wmeentertainment.com
310.248.3022

From: Tyerman, Barry [<mailto:BTyerman@twamm.com>]
Sent: Wednesday, March 30, 2016 12:57 PM
To: Tom McGuire
Subject: RE: Sydney Pollack; "Amazing Grace"

Tom,

Further to our call last week I was expecting by Friday (or at the latest Monday) to receive from you the promised detailed financial information concerning the

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein

1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448
Email: BTyerman@jtwamm.com

From: Tyerman, Barry
Sent: Monday, March 07, 2016 1:01 PM
To: 'Tom McGuire'
Subject: RE: Sydney Pollack; "Amazing Grace"

Tom,

When you and I recently met you indicated that your client may not yet have advised the distributor or the errors and omissions insurance carrier of the various client has expressly acknowledged in writing that he has no rights to exploit the foregoing without the prior written consent of our esteemed client's successor:

I just did not want there to be any potential misunderstanding and, of course, the foregoing and previous discussions and correspondence are without prejudice

Very truly yours,

Barry Tyerman

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448
Email: BTyerman@jtwamm.com

From: Tyerman, Barry
Sent: Monday, August 24, 2015 12:37 PM
To: 'Tom McGuire'
Subject: RE: Sydney Pollack; "Amazing Grace"

Tom,

Just as a reminder, this is the status quo.

No rights have been granted to use the name, likeness, performance or biography of Sydney Pollack in connection with this project and Mr. Elliott specifically

And clearly despite your encouragement and what I thought was our understanding, Mr. Elliott continues to pester friends, family and professional colleagues

Thank you. Barry

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448
Email: BTyerman@jtwamm.com

From: Tyerman, Barry
Sent: Monday, August 17, 2015 5:32 PM
To: Tom McGuire
Subject: FW: Sydney Pollack; "Amazing Grace"

Tom,

I know that we have been missing each other. On the chance that it may take some time to connect, please advise your client that, without prejudice, the successors to the rights of Sydney Pollack accept his sug

I understand that quite provocatively Mr. Elliott has flagrantly breached a "standstill" agreement entered into with or on behalf of Aretha Franklin. Clearly not a positive move or one likely to encourage cooperati

Nothing contained herein or our previous correspondence shall be construed as a waiver of any of our clients' rights, positions or remedies, all of which are expressly reserved.

Barry

PS. Please remind your client that it is unethical for him to be contacting Rachel Pollack or any other member of the family directly. Thank you.

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor
Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Tuesday, August 11, 2015 11:45 AM
To: Tyerman, Barry
Cc: Rachel Pollack; Todd W. Musburger
Subject: Re: Sydney Pollack; "Amazing Grace"

and good morning to you to barry!

look... and rachel is on this email too (along with todd, my lawyer and pal)... so mind your manners, please, bar...

again... according to the records we have, sydney was paid for directing and producing. if you have ANYTHING else... please send it so we can sort it through fairly.

look... i was the one who worked with sydney on this. i have his shot notes. he and i had the conversations. and sydney suggested- without prompting- that i finish this because "alan, you k

i can't change the facts of how the movie came to where it is!

and if this is about money... i am still soliciting investors. if the family wants to buy in... now's the time! (me personally... i have re-mortgaged- "jeremiah johnson"-style- my own house. in sum, i have nothing but love for sydney and the work we did on the film. i am and was honored to work with him on this but i defer to the family as to what to do on the credits. i am putt thank you.

-alan

phone: **323 988 9692**

This email 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

On Aug 11, 2015, at 9:58 AM, Tyerman, Barry <BTyerman@jtwamm.com> wrote:

Alan,

Your blatant and continuing disregard of the interests of our clients, as well as your self-promotion on the backs of the talents and cont Presumably you have and will advise the representatives of the Toronto International Film Festival of the serious claims of various int

Not only would exhibition of the film violate various statutory and common law rights of our clients, but also constitute a serious and

The foregoing obviously is not a complete exposition of the claims against you and any and all other parties participating in the unlaw

Very truly yours,

Barry Tyerman

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448
Email: BTyerman@jtwamm.com

From: Tyerman, Barry
Sent: Tuesday, July 14, 2015 12:18 PM
To: 'alan elliott'
Subject: RE: Sydney Pollack; "Amazing Grace"

Alan,

What you have sent me purports to be an internal Warner Bros. memorandum, not anything like a contract. Neither Sydney nor any rej

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448
Email: BTyerman@jtwamm.com

From: alan elliott [<mailto:alanelliott@g.ucla.edu>]
Sent: Monday, July 13, 2015 8:54 PM
To: Tyerman, Barry
Cc: rpollack@mac.com
Subject: Re: Sydney Pollack; "Amazing Grace"

<image002.png>

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, conta

On Jul 13, 2015, at 5:40 PM, Tyerman, Barry <BTyerman@jtwamm.com> wrote:

Nothing is attached.

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448
Email: BTyerman@jtwamm.com

-----Original Message-----

From: alan elliott (ucla) [alanelliott@g.ucla.edu]
Received: Monday, 13 Jul 2015, 5:10PM
To: Tyerman, Barry [BTyerman@jtwamm.com]
CC: Rachel Pollack [rpollack@mac.com]
Subject: Re: Sydney Pollack; "Amazing Grace"

here is Sydney's from wb(see attached).

as I wrote before, Aretha's contract is not available for public (or private) broadcast.

what I can write as assurance re ms franklins contract is:

- 1) it is insured and vetted
- 2) it has been used twice by wb films

thank you.

phone: 323 988 9692

Sent from a iPhone
<image003.png>

This email... may have been dictated into the iPhone, so please forgive the mistakes... transmission, including any previous message

On Jul 13, 2015, at 5:01 PM, Tyerman, Barry <BTyerman@jtwamm.com> wrote:

You indicate that there is a "signed contract from Sydney" but religiously have avoided

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448
Email: BTyerman@jtwamm.com

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Monday, July 13, 2015 4:14 PM
To: Tyerman, Barry
Cc: Rachel Pollack
Subject: Re: Sydney Pollack; "Amazing Grace"

hi barry

as you know, i do have a signed contract from sydney, sydney never asked for anything from me, and i don't want there to be any bad feelings... and i feel the movie is awesome and a testament to sydney, and if there's anything else, please let me know if there's something anybody wants specifically.

thank you.

-alan

phone: 323 988 9692

This email transmission, including any previous messages or attachments to it, contains information that may be proprietary, confidential

On Jul 13, 2015, at 3:54 PM, Tyerman, Barry <BTyerman@jtwamm.com>

Alan,

Simply ignoring this situation will not make it go away. If you Sydney's involvement, but it is a misrepresentation to say the

All rights, positions and remedies reserved. Barry

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 9
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448
Email: BTyerman@jtwamm.com

From: Tyerman, Barry
Sent: Tuesday, June 16, 2015 3:28 PM
To: 'alan elliott'
Subject: RE: amazing grace links...

Your deflection is unacceptable, Alan, and clearly we will need further use of his name on or in connection with this project. '

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 9
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448
Email: BTyerman@jtwamm.com

From: alan elliott [<mailto:alanelliott@g.ucla.edu>]
Sent: Tuesday, June 16, 2015 3:06 PM
To: Tyerman, Barry
Subject: Re: amazing grace links...

hi barry

i have ms. franklin's signature on her "personal service contract," it was p

as to sydney's credit, he accepted a payment and he never approached me
feel... his best film!!)

ps- i am screening the film tomorrow at wme at 11am if either of the girls

thank you.

-alan

phone: 323 988 9692

This email transmission, including any previous messages or attachments to it, contains informat

On Jun 16, 20

I am not inte
rights neede

To be clear,

All of this is

Barry W. Tye
Jackoway Tye
Austen Mande
1925 Century
Phone: (310
Firm Fax: (3
Direct Fax:
Email: BTye@

From: alan elliott (ucla) [<mailto:>]
Sent: Tuesday, June 16, 2015 2:
To: Tyerman, Barry
Subject: Re: amazing grace link

hi barry

i have one document about sy
the film is now set for telluric
because this journey has been
to this, and i hope you will ur
i hope you'll understand and
i hope this finds you well.

thank you.

-alan

phone: 323 988 9692

This email transmission, including any

On May 6, 2015, at 12:32 PM,

thank you.

-alan

phone: 323 988 9692

This email 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 d

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Fwd: Sydney Pollack; "Amazing Grace"
Date: June 28, 2016 at 9:47 AM
To: Stephen Carroll stephen.carroll@aon.com



thank you.
-alan

phone: 323 988 9692
peace and love.

<http://songsoundrecord.tumblr.com>

Begin forwarded message:

From: ALAN ELLIOTT <alanelliott@g.ucla.edu>
Subject: Fwd: Sydney Pollack; "Amazing Grace"
Date: April 26, 2016 at 1:36:18 PM PDT
To: Stephen Carroll <Stephen.carroll@aon.com>
Cc: "Todd W. Musburger" <todd@musburger.com>

hi stephen

as i am obliged to report all possible claims... here's a continuation.

thank you.
-alan

phone: 323 988 9692
peace and love.

<http://songsoundrecord.tumblr.com>

Begin forwarded message:

From: "Tyerman, Barry" <BTyerman@twamm.com>
Subject: Sydney Pollack; "Amazing Grace"
Date: April 26, 2016 at 1:29:06 PM PDT
To: Tom McGuire <TMcGuire@wmeentertainment.com>
Cc: "alan elliott (ucla)" <alanelliott@g.ucla.edu>, linda burrow <burrow@caldwell-leslie.com>, Liesl Copland <LCopland@wmeentertainment.com>, "Todd Musburger (todd@musburger.com)" <todd@musburger.com>

Tom,

I do not want you to be left with some false sense that our clients are any less committed to pursuing any and all claims and all legal, equitable and administrative remedies to protect the right of use of his name, likeness or the results and proceeds of his services.

Understandably we are not interested in litigating the legal foundation for those claims in correspondence and it is not the duty of the Pollack parties to correct Ms. Burrow's flawed analysis serious violations of Directors Guild of America creative, economic and other provisions applicable to this project; infringement of Mr. Pollack's droit moral and intellectual property rights

It is indisputable that Mr. Elliott, without any authorization from our clients whatsoever, has FOR YEARS been trading openly and brazenly on the Sydney Pollack name, iconic body of film

Mr. Elliott and his representatives have been repeatedly admonished to discontinue misrepresenting to any party that he has any authorization whatsoever from or on behalf of Sydney Pollack all available remedies to protect his economic, personal and creative rights and interests, including against any and all parties in the chain of infringement of our clients' rights.

On a personal note, although I know you are seriously conflicted about your role in this matter, I am disappointed that you without explanation reversed your position, as it was clear to me

In any event, please be advised that the Sydney Pollack rights and claims will not simply go away and our clients are fully committed to whatever litigation or other course of action may be

Very truly yours,

Barry Tyerman

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448
Email: BTyerman@twamm.com

From: Tom McGuire [<mailto:TMcGuire@wmeentertainment.com>]
Sent: Friday, April 08, 2016 11:59 AM
To: Tyerman, Barry
Cc: alan elliott (ucla) (alanelliott@g.ucla.edu); linda burrow; Liesl Copland; Todd Musburger (todd@musburger.com)
Subject: RE: Sydney Pollack; "Amazing Grace"

Barry,

In response to your email below, at this time I am not authorized to give you the financial details of this project. We urge you to respond to Linda Burrow's letter to you from a few weeks back. We are

Thank you.

Tom

Tom McGuire | WME
TMcGuire@wmeentertainment.com
310.248.3022

From: Tyerman, Barry [<mailto:BTyerman@twamm.com>]
Sent: Wednesday, March 30, 2016 12:57 PM
To: Tom McGuire
Subject: RE: Sydney Pollack; "Amazing Grace"

Tom,

Further to our call last week I was expecting by Friday (or at the latest Monday) to receive from you the promised detailed financial information concerning the

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein

1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448
Email: BTyerman@jtwamm.com

From: Tyerman, Barry
Sent: Monday, March 07, 2016 1:01 PM
To: 'Tom McGuire'
Subject: RE: Sydney Pollack; "Amazing Grace"

Tom,

When you and I recently met you indicated that your client may not yet have advised the distributor or the errors and omissions insurance carrier of the various client has expressly acknowledged in writing that he has no rights to exploit the foregoing without the prior written consent of our esteemed client's successor:

I just did not want there to be any potential misunderstanding and, of course, the foregoing and previous discussions and correspondence are without prejudice

Very truly yours,

Barry Tyerman

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448
Email: BTyerman@jtwamm.com

From: Tyerman, Barry
Sent: Monday, August 24, 2015 12:37 PM
To: 'Tom McGuire'
Subject: RE: Sydney Pollack; "Amazing Grace"

Tom,

Just as a reminder, this is the status quo.

No rights have been granted to use the name, likeness, performance or biography of Sydney Pollack in connection with this project and Mr. Elliott specifically

And clearly despite your encouragement and what I thought was our understanding, Mr. Elliott continues to pester friends, family and professional colleagues

Thank you. Barry

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448
Email: BTyerman@jtwamm.com

From: Tyerman, Barry
Sent: Monday, August 17, 2015 5:32 PM
To: Tom McGuire
Subject: FW: Sydney Pollack; "Amazing Grace"

Tom,

I know that we have been missing each other. On the chance that it may take some time to connect, please advise your client that, without prejudice, the successors to the rights of Sydney Pollack accept his sug

I understand that quite provocatively Mr. Elliott has flagrantly breached a "standstill" agreement entered into with or on behalf of Aretha Franklin. Clearly not a positive move or one likely to encourage cooperati

Nothing contained herein or our previous correspondence shall be construed as a waiver of any of our clients' rights, positions or remedies, all of which are expressly reserved.

Barry

PS. Please remind your client that it is unethical for him to be contacting Rachel Pollack or any other member of the family directly. Thank you.

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor
Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Tuesday, August 11, 2015 11:45 AM
To: Tyerman, Barry
Cc: Rachel Pollack; Todd W. Musburger
Subject: Re: Sydney Pollack; "Amazing Grace"

and good morning to you to barry!

look... and rachel is on this email too (along with todd, my lawyer and pal)... so mind your manners, please, bar...

again... according to the records we have, sydney was paid for directing and producing. if you have ANYTHING else... please send it so we can sort it through fairly.

look... i was the one who worked with sydney on this. i have his shot notes. he and i had the conversations. and sydney suggested- without prompting- that i finish this because "alan, you k

i can't change the facts of how the movie came to where it is!

and if this is about money... i am still soliciting investors. if the family wants to buy in... now's the time! (me personally... i have re-mortgaged- "jeremiah johnson"-style- my own house. in sum, i have nothing but love for sydney and the work we did on the film. i am and was honored to work with him on this but i defer to the family as to what to do on the credits. i am putt thank you.

-alan

phone: **323 988 9692**

This email 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

On Aug 11, 2015, at 9:58 AM, Tyerman, Barry <BTyerman@jtwamm.com> wrote:

Alan,

Your blatant and continuing disregard of the interests of our clients, as well as your self-promotion on the backs of the talents and cont Presumably you have and will advise the representatives of the Toronto International Film Festival of the serious claims of various int

Not only would exhibition of the film violate various statutory and common law rights of our clients, but also constitute a serious and

The foregoing obviously is not a complete exposition of the claims against you and any and all other parties participating in the unlaw

Very truly yours,

Barry Tyerman

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448
Email: BTyerman@jtwamm.com

From: Tyerman, Barry
Sent: Tuesday, July 14, 2015 12:18 PM
To: 'alan elliott'
Subject: RE: Sydney Pollack; "Amazing Grace"

Alan,

What you have sent me purports to be an internal Warner Bros. memorandum, not anything like a contract. Neither Sydney nor any rej

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448
Email: BTyerman@jtwamm.com

From: alan elliott [<mailto:alanelliott@g.ucla.edu>]
Sent: Monday, July 13, 2015 8:54 PM
To: Tyerman, Barry
Cc: rpollack@mac.com
Subject: Re: Sydney Pollack; "Amazing Grace"

<image002.png>

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, conta

On Jul 13, 2015, at 5:40 PM, Tyerman, Barry <BTyerman@jtwamm.com> wrote:

Nothing is attached.

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448
Email: BTyerman@jtwamm.com

-----Original Message-----

From: alan elliott (ucla) [alanelliott@g.ucla.edu]
Received: Monday, 13 Jul 2015, 5:10PM
To: Tyerman, Barry [BTyerman@jtwamm.com]
CC: Rachel Pollack [rpollack@mac.com]
Subject: Re: Sydney Pollack; "Amazing Grace"

here is Sydney's from wb(see attached).

as I wrote before, Aretha's contract is not available for public (or private) broadcast.

what I can write as assurance re ms franklins contract is:

- 1) it is insured and vetted
- 2) it has been used twice by wb films

thank you.

phone: 323 988 9692

Sent from a iPhone
<image003.png>

This email... may have been dictated into the iPhone, so please forgive the mistakes... transmission, including any previous message

On Jul 13, 2015, at 5:01 PM, Tyerman, Barry <BTyerman@jtwamm.com> wrote:

You indicate that there is a "signed contract from Sydney" but religiously have avoided

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448
Email: BTyerman@jtwamm.com

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Monday, July 13, 2015 4:14 PM
To: Tyerman, Barry
Cc: Rachel Pollack
Subject: Re: Sydney Pollack; "Amazing Grace"

hi barry

as you know, i do have a signed contract from sydney, sydney never asked for anything from me, and i don't want there to be any bad feelings... and i feel the movie is awesome and a testament to sydney, and if there's anything else, please let me know if there's something anybody wants specifically.

thank you.

-alan

phone: 323 988 9692

This email transmission, including any previous messages or attachments to it, contains information that may be proprietary, confidential

On Jul 13, 2015, at 3:54 PM, Tyerman, Barry <BTyerman@jtwamm.com>

Alan,

Simply ignoring this situation will not make it go away. If you Sydney's involvement, but it is a misrepresentation to say the

All rights, positions and remedies reserved. Barry

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 9
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448
Email: BTyerman@jtwamm.com

From: Tyerman, Barry
Sent: Tuesday, June 16, 2015 3:28 PM
To: 'alan elliott'
Subject: RE: amazing grace links...

Your deflection is unacceptable, Alan, and clearly we will need further use of his name on or in connection with this project. '

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 9
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448
Email: BTyerman@jtwamm.com

From: alan elliott [<mailto:alanelliott@g.ucla.edu>]
Sent: Tuesday, June 16, 2015 3:06 PM
To: Tyerman, Barry
Subject: Re: amazing grace links...

hi barry

i have ms. franklin's signature on her "personal service contract," it was j

as to sydney's credit, he accepted a payment and he never approached me
feel... his best film!!)

ps- i am screening the film tomorrow at wme at 11am if either of the girls

thank you.

-alan

phone: 323 988 9692

This email transmission, including any previous messages or attachments to it, contains informat

On Jun 16, 20

I am not inte
rights neede

To be clear,

All of this is

Barry W. Tye
Jackoway Tye
Austen Mande
1925 Century
Phone: (310
Firm Fax: (3
Direct Fax:
Email: BTye@

From: alan elliott (ucla) [<mailto:>]
Sent: Tuesday, June 16, 2015 2:
To: Tyerman, Barry
Subject: Re: amazing grace link

hi barry

i have one document about sy
the film is now set for telluric
because this journey has been
to this, and i hope you will ur
i hope you'll understand and
i hope this finds you well.

thank you.

-alan

phone: 323 988 9692

This email transmission, including any

On May 6, 2015, at 12:32 PM,

thank you.

-alan

phone: 323 988 9692

This email 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 d

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Fwd: Sydney Pollack; "Amazing Grace"
Date: March 7, 2016 at 5:44 PM
To: Stephen Carroll stephen.carroll@aon.com
Cc: Tom McGuire tmcguire@wmeentertainment.com, Todd W. Musburger todd@musburger.com



thank you.

-alan

phone: [323 988 9692](tel:3239889692)
peace and love.

Begin forwarded message:

From: Tom McGuire <TMcGuire@wmeentertainment.com>
Date: March 7, 2016 at 1:32:40 PM PST
To: Todd Musburger <todd@musburger.com>, "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Subject: Fwd: Sydney Pollack; "Amazing Grace"

Sent from my iPad

Tom McGuire | WME
TMcGuire@wmeentertainment.com
310.248.3022

Begin forwarded message:

From: "Tyerman, Barry" <BTyerman@jtwamm.com>
Date: March 7, 2016 at 9:00:43 PM PST
To: Tom McGuire <TMcGuire@wmeentertainment.com>
Subject: RE: Sydney Pollack; "Amazing Grace"

Tom,

When you and I recently met you indicated that your client may not yet have advised the distributor or the errors and omissions insurance carrier of the various concerning the rampant unauthorized use of his name and likeness for commercial exploitation which has continued for years, the rights to the results and pro in detail in previous discussions and correspondence. Moreover your client has expressly acknowledged in writing that he has no rights to exploit the foregoing;

I just did not want there to be any potential misunderstanding and, of course, the foregoing and previous discussions and correspondence are without prejudice

Very truly yours,

Barry Tyerman

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448
Email: BTyerman@jtwamm.com

From: Tyerman, Barry
Sent: Monday, August 24, 2015 12:37 PM
To: Tom McGuire
Subject: RE: Sydney Pollack; "Amazing Grace"

Tom,

Just as a reminder, this is the status quo.

No rights have been granted to use the name, likeness, performance or biography of Sydney Pollack in connection with this project and Mr. Elliott specifically Anyone acting inconsistently with this will be held accountable.

And clearly despite your encouragement and what I thought was our understanding, Mr. Elliott continues to pester friends, family and professional colleagues

Thank you. Barry

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448
Email: BTyerman@jtwamm.com

From: Tyerman, Barry
Sent: Monday, August 17, 2015 5:32 PM
To: Tom McGuire
Subject: FW: Sydney Pollack; "Amazing Grace"

Tom,

I know that we have been missing each other. On the chance that it may take some time to connect, please advise your client that, without prejudice, the successors to the rights of Sydney Pollack accept his sue performance or image and, without limiting the generality of the foregoing, delete any and all visual or other references to Mr. Pollack in and in connection with the film.

I understand that quite provocatively Mr. Elliott has flagrantly breached a "standstill" agreement entered into with or on behalf of Aretha Franklin. Clearly not a positive move or one likely to encourage cooperati
Nothing contained herein or our previous correspondence shall be construed as a waiver of any of our clients' rights, positions or remedies, all of which are expressly reserved.

Barry

PS. Please remind your client that it is unethical for him to be contacting Rachel Pollack or any other member of the family directly. Thank you.

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor
Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Tuesday, August 11, 2015 11:45 AM
To: Tyerman, Barry
Cc: Rachel Pollack; Todd W. Musburger
Subject: Re: Sydney Pollack; "Amazing Grace"

and good morning to you to barry!

look... and rachel is on this email too (along with todd, my lawyer and pal)... so mind your manners, please, bar...

again... according to the records we have, sydney was paid for directing and producing. if you have ANYTHING else... please send it so we can sort it through fairly.

look... i was the one who worked with sydney on this. i have his shot notes. he and i had the conversations. and sydney suggested- without prompting- that i finish this because "alan, you k "director" i will...

i can't change the facts of how the movie came to where it is!

and if this is about money... i am still soliciting investors. if the family wants to buy in... now's the time! (me personally... i have re-mortgaged- "jeremiah johnson"-style- my own house. mortgaged the house on any of these four occasion.)

in sum, i have nothing but love for sydney and the work we did on the film. i am and was honored to work with him on this but i defer to the family as to what to do on the credits. i am putt

thank you.

-alan

phone: 323 988 9692

This email 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

On Aug 11, 2015, at 9:58 AM, Tyerman, Barry <BTyerman@jtwamm.com> wrote:

Alan,

Your blatant and continuing disregard of the interests of our clients, as well as your self-promotion on the backs of the talents and contractual and c unprofessional and disgusting. Since you have ignored our efforts to address this situation amicably we have no recourse but to engage with Warner underlying musical and other materials to shut down your rogue activities. Presumably you have and will advise the representatives of the Toronto Festival and all other parties in the chain of any unlawful exploitation of these rights. Please confirm that the Festival has been so advised.

Not only would exhibition of the film violate various statutory and common law rights of our clients, but also constitute a serious and direct violati creative rights and credits and formal grievances are being initiated.

The foregoing obviously is not a complete exposition of the claims against you and any and all other parties participating in the unlawful exploitati

Very truly yours,

Barry Tyerman

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448
Email: BTyerman@jtwamm.com

From: Tyerman, Barry
Sent: Tuesday, July 14, 2015 12:18 PM
To: 'alan elliott'
Subject: RE: Sydney Pollack; "Amazing Grace"

Alan,

What you have sent me purports to be an internal Warner Bros. memorandum, not anything like a contract. Neither Sydney nor any representative i All rights, positions and remedies reserved. Barry

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448
Email: BTyerman@jtwamm.com

From: alan elliott [<mailto:alanelliott@g.ucla.edu>]
Sent: Monday, July 13, 2015 8:54 PM
To: Tyerman, Barry
Cc: rpollack@mac.com
Subject: Re: Sydney Pollack; "Amazing Grace"

<image002.png>

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 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

On Jul 13, 2015, at 5:40 PM, Tyerman, Barry <BTyerman@jtwamm.com> wrote:

Nothing is attached.

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448
Email: BTyerman@jtwamm.com

-----Original Message-----

From: alan elliott (ucla) [alanelliott@g.ucla.edu]
Received: Monday, 13 Jul 2015, 5:10PM
To: Tyerman, Barry [BTyerman@jtwamm.com]
CC: Rachel Pollack [rpollack@mac.com]
Subject: Re: Sydney Pollack; "Amazing Grace"

here is Sydney's from wb(see attached).

as I wrote before, Aretha's contract is not available for public (or private) broadcast.

what I can write as assurance re ms franklins contract is:

- 1) it is insured and vetted
- 2) it has been used twice by wb films

thank you.

phone: 323 988 9692

Sent from a iPhone

<image003.png>

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 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

On Jul 13, 2015, at 5:01 PM, Tyerman, Barry <BTyerman@jtwamm.com> wrote:

You indicate that there is a "signed contract from Sydney" but religiously have avoided providing this. And we're led to believe she is being shown, which certainly would not have pleased Sydney. Perhaps you could begin by providing the contracts with

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448
Email: BTyerman@jtwamm.com

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Monday, July 13, 2015 4:14 PM
To: Tyerman, Barry
Cc: Rachel Pollack
Subject: Re: Sydney Pollack; "Amazing Grace"

hi barry

as you know, i do have a signed contract from sydney, sydney never asked for anything from me, and i am not sure what you- or the family want...

i don't want there to be any bad feelings... and i feel the movie is awesome and a testament to sydney... and if rachel or rebecca want me to take up and if there's anything else, please let me know if there's something anybody wants specifically.

thank you.

-alan

phone: 323 988 9692

This email 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 notify the sender by reply info@alanelliott.net.

On Jul 13, 2015, at 3:54 PM, Tyerman, Barry <BTyerman@jtwamm.com> wrote:

Alan,

Simply ignoring this situation will not make it go away. If you will not voluntarily withdraw any exhibition of the material, we are specifically instructed to protect the Sydney Pollack name and not permit its use without author

measures. we are specifically instructed to protect the Sydney Pollack name and not permit its use without adding how good you may believe the film is (not surprising given Sydney's involvement, but it is a misrepresentation to gloss over these serious legal issues.

All rights, positions and remedies reserved. Barry

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448
Email: BTyerman@jtamm.com

From: Tyerman, Barry
Sent: Tuesday, June 16, 2015 3:28 PM
To: 'alan elliott'
Subject: RE: amazing grace links...

Your deflection is unacceptable, Alan, and clearly we will need to escalate matters in order properly to address c of the underlying documentation which you allege exists. With due respect Sydney Pollack has ultimate rights to hereby instruct you to cease and desist immediately from any further use of his name on or in connection with the fully accountable. Barry

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448
Email: BTyerman@jtamm.com

From: alan elliott (<mailto:alanelliott@g.ucla.edu>)
Sent: Tuesday, June 16, 2015 3:06 PM
To: Tyerman, Barry
Subject: Re: amazing grace links...

hi barry

i have ms. franklin's signature on her "personal service contract," it was provided to me by wb. (fyi: ms. franklin signed a "personal s to the late john calley and by joe boyd- who served as music director at wb films in 1972. both calley and sydney often alluded to sue

as to sydney's credit, he accepted a payment and he never approached me about anything re: further payment. according to the doc i h according to the contract (a favorite jerry wexler expression...), sydney has no "rights" to the film. if the family wishes for me to rem what they want, i can do so...but why would anybody want that, barry? (this is, i feel... his best film!!)

ps- i am screening the film tomorrow at wme at 11am if either of the girls wants to come!

thank you.

-alan

phone: 323 988 9692

This email transmission, including any previous messages or attachments to it, contains information that may be proprietary, confidential and/or privileged. If you have received making use of it in any manner (all of which acts are strictly prohibited), and so notify the sender by reply info@alanelliott.net.

On Jun 16, 2015, at 2:42 PM, Tyerman, Barry <BTyerman@jtamm.com> wrote:

I am not interested in "opening any cans of worms". Only to protect the rights of Sydney sure that his work is not exploited without those issues being addressed and not over the would never have countenanced that and was very clear that her rights needed to be add manner. If you have contracts to establish that she has given that permission, it is imper documentation of any arrangements with Sydney Pollack).

To be clear, you have no rights to utilize any of the rights of Sydney Pollack, including l "Directed by Pollack"), without further written agreement from his successors.

All of this is not exhaustive and is without prejudice to the other rights, positions and re:

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448
Email: BTyerman@jtamm.com

From: alan elliott (ucla) (<mailto:alanelliott@g.ucla.edu>)
Sent: Tuesday, June 16, 2015 2:24 PM
To: Tyerman, Barry
Subject: Re: amazing grace links...

hi barry

i have one document about sydney's deal with wb. (i'm sure you have that though.) it is the only document that mention something specific that you are looking for, i will try to help suss it out.

the film is now set for telluride and i anticipate it will then go to toronto.

because this journey has been extremely lawyer intensive (sydney would have killed a few people by now...)... i am not
to this, and i hope you will understand that this is written with complete respect... i feel i have put all the worms in the
i hope you'll understand and if there's something i can help you with that requires any non-can opening... especially fo
sydney's wish that i "go finish the film!". if the family wants to discuss ANYTHING having to do with this... please he
i hope this finds you well.

thank you.

-alan

phone: 323 988 9692

This email transmission, including any previous messages or attachments to it, contains information that may be proprietary, confidential and/or privileged. If, 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 n

On Jun 16, 2015, at 2:05 PM, Tyerman, Barry <BTyerman@jtwamm.com> wrote:

Alan,

May I please have the courtesy of a response and copies of the relevant docu

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448
Email: BTyerman@jtwamm.com

From: Tyerman, Barry
Sent: Wednesday, May 06, 2015 1:08 PM
To: 'alan elliott (ucla)'
Subject: RE: amazing grace links...

Sydney was equally clear with me that the Aretha rights had not been cleared. Please sen
can take a look. At some point (sooner rather than later) I should also see your agreement

Does this mean that you have not heard from anyone on behalf of Aretha recently?

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448
Email: BTyerman@jtwamm.com

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Wednesday, May 06, 2015 1:06 PM
To: Tyerman, Barry
Subject: Re: amazing grace links...

hey barry

as John Calley quite clearly yelled at me at a certain point... "Do you think I would send Sydney Pollack
wasn't a release?!"

the answer is:

there is.

Aretha signed a personal service contract with warner 7 arts (The film company) which wb and Sydney re
the man whose responsibility it was to secure all releases for filming, joe Boyd, (joe was director of film r
letter re-stating these facts.

as jerry wexler always implored me to do, "check what's in the contract!" (we did, and that's what we are)

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, includ
attachments to it, contains information that may be proprietary, confidential and/or privileged. If you have
please delete the original transmission without making copies, disclosing, distributing, saving or making u
which acts are strictly prohibited), and so notify the sender by reply info@alanelliott.net

On May 6, 2015, at 12:32 PM, Tyerman, Barry <BTyerman@jtwamm.com> wrote:

Alan,

In your response you did not address the issue of the Aretha Frar
rights. Have you made an arrangement with her? And is there a c
with the record label? There is absolutely no way that the Sydney

with the record label. There is absolutely no way that the Sydney Pollack rights will be cleared, including any possibility of the film being attributed to him (the whole notion of "Directed by Sydney Pollack" is an issue), unless and until all of this has been worked through and fully documented.

Given the various items to be resolved, all rights, positions and remedies are expressly reserved.

Thanks. Barry

PS. None of these necessary "legalities" reflect on the quality of project or our collective desire hopefully to see Sydney's good work finally and respectfully made available to an audience.

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 9006
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448
Email: BTyerman@twamm.com

To: Tyerman, Barry
Subject: Fwd: amazing grace links...

hey barry

I reached out to Sydney's girls through Donna (see Rachel's sweet email below as discussed I am taking the film to premiere at telluride.

as of now I am planning on:

directed by Sydney pollack

produced by Sydney pollack and alan Elliott

if the girls have any issues or concerns, please have them contact me. I will do what they feel is appropriate re credits.

and if there's any documentation or... anything else that I should know about iteration of the project Sydney and I started on in 2007... or anything from the passed (I'd be very interested to see the 1997 file!) please send it over and let discuss.

hope this finds you well.

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 contains information that may be proprietary, confidential and/or privileged. have received this transmission in error, please delete the original transmissic without making copies, disclosing, distributing, saving or making use of it in manner (all of which acts are strictly prohibited), and so notify the sender by reply info@alanelliott.net.

Begin forwarded message:

From: Donna Ostroff <missdo@aol.com>
Date: April 22, 2015 at 3:44:03 PM PDT
To: "alanelliott@ucla.edu" <alanelliott@ucla.edu>
Subject: Fwd: amazing grace links...

From: Rachel Pollack <rpollack@mac.com>
Date: April 22, 2015 at 2:42:27 PM PDT
To: MissDO@aol.com
Subject: Re: amazing grace links...

I just
watch
ed the
trailer
and
will
watch
the
rest
when
I get
home.
What
a
wond
erful
wond
erful
thing
.



From: ALAN ELLIOTT alanelliott@g.ucla.edu
Subject: Fwd: Sydney Pollack; "Amazing Grace"
Date: April 26, 2016 at 1:36 PM
To: Stephen Carroll Stephen.carroll@aon.com
Cc: Todd W. Musburger todd@musburger.com

hi stephen
as i am obliged to report all possible claims... here's a continuation.
thank you.
-alan

phone: 323 988 9692
peace and love.

<http://songsoundrecord.tumblr.com>

Begin forwarded message:

From: "Tyerman, Barry" <BTyerman@jtwamm.com>
Subject: Sydney Pollack; "Amazing Grace"
Date: April 26, 2016 at 1:29:06 PM PDT
To: Tom McGuire <TMcGuire@wmeentertainment.com>
Cc: "alan elliott (ucla)" <alanelliott@g.ucla.edu>; linda burrow <burrow@caldwell-leslie.com>; Liesl Copland <LCopland@wmeentertainment.com>; "Todd Musburger (todd@musburger.com)" <todd@musburger.com>

Tom,

I do not want you to be left with some false sense that our clients are any less committed to pursuing any and all claims and all legal, equitable and administrative remedies to protect the right use of his name, likeness or the results and proceeds of his services.

Understandably we are not interested in litigating the legal foundation for those claims in correspondence and it is not the duty of the Pollack parties to correct Ms. Burrow's flawed analysis serious violations of Directors Guild of America creative, economic and other provisions applicable to this project; infringement of Mr. Pollack's droit moral and intellectual property rights I

It is indisputable that Mr. Elliott, without any authorization from our clients whatsoever, has FOR YEARS been trading openly and brazenly on the Sydney Pollack name, iconic body of film

Mr. Elliott and his representatives have been repeatedly admonished to discontinue misrepresenting to any party that he has any authorization whatsoever from or on behalf of Sydney Pollack all available remedies to protect his economic, personal and creative rights and interests, including against any and all parties in the chain of infringement of our clients' rights.

On a personal note, although I know you are seriously conflicted about your role in this matter, I am disappointed that you without explanation reversed your position, as it was clear to me fr

In any event, please be advised that the Sydney Pollack rights and claims will not simply go away and our clients are fully committed to whatever litigation or other course of action may be r

Very truly yours,

Barry Tyerman

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448
Email: BTyerman@jtwamm.com

From: Tom McGuire [<mailto:TMcGuire@wmeentertainment.com>]
Sent: Friday, April 08, 2016 11:59 AM
To: Tyerman, Barry
Cc: alan elliott (ucla) (alanelliott@g.ucla.edu); linda burrow; Liesl Copland; Todd Musburger (todd@musburger.com)
Subject: RE: Sydney Pollack; "Amazing Grace"

Barry,

In response to your email below, at this time I am not authorized to give you the financial details of this project. We urge you to respond to Linda Burrow's letter to you from a few weeks back. We are

Thank you.

Tom

Tom McGuire | WME
TMcGuire@wmeentertainment.com
310.248.3022

From: Tyerman, Barry [<mailto:BTyerman@jtwamm.com>]
Sent: Wednesday, March 30, 2016 12:57 PM
To: Tom McGuire
Subject: RE: Sydney Pollack; "Amazing Grace"

Tom,

Further to our call last week I was expecting by Friday (or at the latest Monday) to receive from you the promised detailed financial information concerning th

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448
Email: BTyerman@jtwamm.com

From: Tyerman, Barry
Sent: Monday, March 07, 2016 1:01 PM
To: Tom McGuire
Subject: RE: Sydney Pollack; "Amazing Grace"

Tom,

When you and I recently met you indicated that your client may not yet have advised the distributor or the errors and omissions insurance carrier of the various client has expressly acknowledged in writing that he has no rights to exploit the foregoing without the prior written consent of our esteemed client's successors.

I just did not want there to be any potential misunderstanding and, of course, the foregoing and previous discussions and correspondence are without prejudice to

Very truly yours,

Barry Tyerman

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448
Email: BTyerman@jtwamm.com

From: Tyerman, Barry
Sent: Monday, August 24, 2015 12:37 PM
To: "Tom McGuire"
Subject: RE: Sydney Pollack; "Amazing Grace"

Tom,

Just as a reminder, this is the status quo.

No rights have been granted to use the name, likeness, performance or biography of Sydney Pollack in connection with this project and Mr. Elliott specifically :

And clearly despite your encouragement and what I thought was our understanding, Mr. Elliott continues to pester friends, family and professional colleagues o

Thank you. Barry

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448
Email: BTyerman@jtwamm.com

From: Tyerman, Barry
Sent: Monday, August 17, 2015 5:32 PM
To: Tom McGuire
Subject: FW: Sydney Pollack; "Amazing Grace"

Tom,

I know that we have been missing each other. On the chance that it may take some time to connect, please advise your client that, without prejudice, the successors to the rights of Sydney Pollack accept his suggestion I understand that quite provocatively Mr. Elliott has flagrantly breached a "standstill" agreement entered into with or on behalf of Aretha Franklin. Clearly not a positive move or one likely to encourage cooperation Nothing contained herein or our previous correspondence shall be construed as a waiver of any of our clients' rights, positions or remedies, all of which are expressly reserved.

Barry

PS. Please remind your client that it is unethical for him to be contacting Rachel Pollack or any other member of the family directly. Thank you.

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor
Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Tuesday, August 11, 2015 11:45 AM
To: Tyerman, Barry
Cc: Rachel Pollack; Todd W. Musburger
Subject: Re: Sydney Pollack; "Amazing Grace"

and good morning to you to barry!

look... and rachel is on this email too (along with todd, my lawyer and pal)... so mind your manners, please, bar...

again... according to the records we have, sydney was paid for directing and producing. if you have ANYTHING else... please send it so we can sort it through fairly.

look... i was the one who worked with sydney on this. i have his shot notes. he and i had the conversations. and sydney suggested- without prompting- that i finish this because "alan, you know i can't change the facts of how the movie came to where it is!

and if this is about money... i am still soliciting investors. if the family wants to buy in... now's the time! (me personally... i have re-mortgaged- "jeremiah johnson"-style- my own house. for in sum, i have nothing but love for sydney and the work we did on the film. i am and was honored to work with him on this but i defer to the family as to what to do on the credits. i am putting thank you.

-alan

phone: **323 988 9692**

This email 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 m

On Aug 11, 2015, at 9:58 AM, Tyerman, Barry <BTyerman@jtwamm.com> wrote:

Alan,

Your blatant and continuing disregard of the interests of our clients, as well as your self-promotion on the backs of the talents and contr: Presumably you have and will advise the representatives of the Toronto International Film Festival of the serious claims of various inter

Not only would exhibition of the film violate various statutory and common law rights of our clients, but also constitute a serious and d

The foregoing obviously is not a complete exposition of the claims against you and any and all other parties participating in the unlawf

Very truly yours,

Barry Tyerman

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448
Email: BTyerman@jtwamm.com

From: Tyerman, Barry
Sent: Tuesday, July 14, 2015 12:18 PM
To: 'alan elliott'
Subject: RE: Sydney Pollack; "Amazing Grace"

Alan,

What you have sent me purports to be an internal Warner Bros. memorandum, not anything like a contract. Neither Sydney nor any rep

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448
Email: BTyerman@jtwamm.com

From: alan elliott [<mailto:alanelliott@g.ucla.edu>]
Sent: Monday, July 13, 2015 8:54 PM
To: Tyerman, Barry
Cc: rpollack@mac.com
Subject: Re: Sydney Pollack; "Amazing Grace"

<image002.png>

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, contain

On Jul 13, 2015, at 5:40 PM, Tyerman, Barry <BTyerman@jtwamm.com> wrote:

Nothing is attached.

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448
Email: BTyerman@jtwamm.com

-----Original Message-----
From: alan elliott (ucla) [alanelliott@g.ucla.edu]
Received: Monday, 13 Jul 2015, 5:10PM
To: Tyerman, Barry [BTyerman@jtwamm.com]
CC: Rachel Pollack [rpollack@mac.com]
Subject: Re: Sydney Pollack; "Amazing Grace"

here is Sydney's from wb(see attached).

as I wrote before, Aretha's contract is not available for public (or private) broadcast.

what I can write as assurance re ms franklins contract is:

- 1) it is insured and vetted
- 2) it has been used twice by wb films

thank you.

phone: 323 988 9692

phone: 323 988 9692

Sent from a iPhone
<image003.png>

This email... may have been dictated into the iPhone, so please forgive the mistakes... transmission, including any previous message:

On Jul 13, 2015, at 5:01 PM, Tyerman, Barry <BTyerman@jtwamm.com> wrote:

You indicate that there is a "signed contract from Sydney" but religiously have avoided

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448
Email: BTyerman@jtwamm.com

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Monday, July 13, 2015 4:14 PM
To: Tyerman, Barry
Cc: Rachel Pollack
Subject: Re: Sydney Pollack; "Amazing Grace"

hi barry

as you know, i do have a signed contract from sydney, sydney never asked for anything from me, and i

i don't want their to be any bad feelings... and i feel the movie is awesome and a testament to sydney..

and if there's anything else, please let me know if there's something anybody wants specifically.

thank you.

-alan

phone: 323 988 9692

This email transmission, including any previous messages or attachments to it, contains information that may be proprietary, confidential

On Jul 13, 2015, at 3:54 PM, Tyerman, Barry <BTyerman@jtwamm.com>

Alan,

Simply ignoring this situation will not make it go away. If you Sydney's involvement, but it is a misrepresentation to say the c

All rights, positions and remedies reserved. Barry

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 901
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448
Email: BTyerman@jtwamm.com

From: Tyerman, Barry
Sent: Tuesday, June 16, 2015 3:28 PM
To: 'alan elliott'
Subject: RE: amazing grace links...

Your deflection is unacceptable, Alan, and clearly we will need further use of his name on or in connection with this project. Y

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 901
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448
Email: BTyerman@jtwamm.com

From: alan elliott [<mailto:alanelliott@g.ucla.edu>]
Sent: Tuesday, June 16, 2015 3:06 PM
To: Tyerman, Barry
Subject: Re: amazing grace links...

hi barry

i have ms. franklin's signature on her "personal service contract," it was pr as to sydney's credit, he accepted a payment and he never approached me t feel... his best film!!)

ps- i am screening the film tomorrow at wme at 11am if either of the girls v

thank you.

-alan

phone: 323 988 9692

This email transmission, including any previous messages or attachments to it, contains information

On Jun 16, 2015

I am not inter
rights needed

To be clear, y

All of this is 1

Barry W. Tyer
Jackoway Tyer
Austen Mandel
1925 Century
Phone: (310)
Firm Fax: (310)
Direct Fax: (
Email: BTyer@ucla.edu

From: alan elliott (ucla) [<mailto:al>]
Sent: Tuesday, June 16, 2015 2:2
To: Tyerman, Barry
Subject: Re: amazing grace links.

hi barry

i have one document about syd
the film is now set for telluride
because this journey has been c
to this, and i hope you will und
i hope you'll understand and if
i hope this finds you well.

thank you.

-alan

phone: 323 988 9692

This email transmission, including any pr

On May 6, 2015, at 12:32 PM, 1

thank you.

-alan

phone: 323 988 9692

This email 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 del

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Fwd: sydney pollack
Date: March 1, 2016 at 9:50 AM
To: Boyd Joe boyd1j@yahoo.co.uk



thank you.

-alan

phone: 323 988 9692
peace and love.

<http://songsoundrecord.tumblr.com>

Begin forwarded message:

From: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Subject: sydney pollack
Date: March 1, 2016 at 9:50:32 AM PST
To: Stephen Carroll <stephen.carroll@aon.com>
Cc: "Todd W. Musburger" <todd@musburger.com>

Steve-

As we discussed just now on the phone, Barry Tyerman is the attorney for Sydney Pollack (Mr. Pollack passed away in May, 2008). Since I received the quitclaim from Warner Bros. in 2007, out of respect for the late Mr. Pollack, I have kept Mr. Tyerman updated on the film's progress. Out of respect, I have asked Mr. Tyerman what he would consider for additional payment for Mr. Pollack's heirs. Mr. Tyerman has, in these eight years, not given me an answer.

Mr. Tyerman asked me to remove Mr. Pollack's credit from the film prior to the Telluride Film Festival in September, 2015, I did so. As a potential deal for Aretha Franklin came, Mr. Tyerman asked for Mr. Pollack's heirs to be further compensated and so I want to tell you so that insurance is aware.

Over the years, I have repeatedly provided Mr. Tyerman with the following as proof of Warners' payment:

<http://alsrecordsandtapes.com/amazinglaw/wbdocs/wb%20legal%20pollack%20payment.pdf>

I have discussed the issue of Mr. Pollack and Mr. Tyerman's claim on behalf of Mr. Pollack with both Dan Furie, Warner Bros . Pictures, Business Affairs, and the President, Worldwide Business Affairs, Warner Bros. Pictures Steven S. Spira. Warners has provided me all documents re: Sydney Pollack. Mr. Tyerman has claimed that there may be a previous 1997 contract with Warners, he was asked for the contract but declined to show it. Warners has no copy of the agreement Mr. Tyerman talked of.

Both Mr. Spira and Mr. Furie they advised Mr. Tyerman that, according to all known documents, Mr. Pollack is not owed anything further. Mr. Spira said to me, "Mr. Tyerman asked us for money on this. I told him he had no cause. He is on a fishing expedition."

Other docs. with Sydney Pollack can be found at the web site (<http://alsrecordsandtapes.com/amazinglaw/wbdocs/>), including a general release for Mr. Pollack's image/likeness (which Mr. Pollack and his crew wrote):

<http://alsrecordsandtapes.com/amazinglaw/wbdocs/amazing%20releases%20church%20choir.pdf>

thank you.

-alan

phone: 323 988 9692
peace and love.

<http://songsoundrecord.tumblr.com>

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: sydney pollack
Date: March 3, 2016 at 2:30 PM
To: Stephen Carroll stephen.carroll@aon.com
Cc: Todd W. Musburger todd@musburger.com, Tom McGuire tmcguire@wmeentertainment.com



Steve-

As we discussed now on the phone, below are my email correspondences re: Sydney Pollack's attorney Barry Tyerman. I have searched my files in an effort to give a complete view. You should also speak with Tom McGuire about his meetings/conversations with Barry Tyerman.

Some context (and please ask any questions):

Barry Tyerman is the attorney for Sydney Pollack (Mr. Pollack passed away in May, 2008). Since I received quitclaim of the project from Warner Bros. in 2007, out of respect for the late Mr. Pollack, I have kept Mr. Tyerman updated on the film's progress. I have, as you can see below, asked Mr. Tyerman what he would consider for additional payment for Mr. Pollack's heirs. Mr. Tyerman has, in these eight years, not given me an answer.

Prior to the Telluride Film Festival in September, 2015, Mr. Tyerman asked me to remove Mr. Pollack's credit from the film, I did so.

Over the years, I have repeatedly provided Mr. Tyerman with the following as proof of Warners' payment:

<http://alsrecordsandtapes.com/amazinglaw/wbdocs/wb%20legal%20pollack%20payment.pdf>

I have discussed the issue of Mr. Pollack and Mr. Tyerman's claim on behalf of Mr. Pollack with both Dan Furie, Warner Bros. Pictures, Business Affairs, and the President, Worldwide Business Affairs, Warner Bros. Pictures Steven S. Spira.

Warners has provided me all documents re: Sydney Pollack.

Mr. Tyerman has claimed that there may be a previous 1997 contract with Warners. Mr. Tyerman was asked by Tom McGuire a month or so ago about the contract. Mr. Tyerman has not provided the contract. Warners has no copy of the agreement Mr. Tyerman talked of.

Both Mr. Spira and Mr. Furie advised Mr. Tyerman that, according to all known documents, Mr. Pollack is not owed anything further.

Mr. Spira said to me privately, "Mr. Tyerman asked us for money on this. I told him he had no cause. He is on a fishing expedition."

Other docs. with Sydney Pollack can be found at the web site (<http://alsrecordsandtapes.com/amazinglaw/wbdocs/>), including a general release for Mr. Pollack's image/likeness (which Mr. Pollack and his crew wrote):

<http://alsrecordsandtapes.com/amazinglaw/wbdocs/amazing%20releases%20church%20choir.pdf>

thank you.

-alan

phone: 323 988 9692
peace and love.

<http://songsoundrecord.tumblr.com>

these are from emails from you and tom and liesl and herb jordan.

before i call insurance carrier, let's discuss precisely what you want me to say.

From: "Herb Jordan" <jordan@adagegroup.net>
Subject: Various
Date: February 6, 2008 at 11:03:01 AM PST
To: "Alan Elliott" <Alan@AlanElliott.net>

Alan, Here's the Latest:

Aretha

- Spoke with Ann Stockman at Warner Pictures. She checked Sydney's file and came up

blank. I suggested that he may have done business through a loan out company, and that it could conceivably be filed under the company name. She researched his company "Sanford Production" today and found nothing on Amazing Grace. I also suggested that the doc could be traced through the disbursement of his fee. But as with most things, records of that end of the transaction seem to be lost to history. This circles back to the matter of how we deal with Sydney. Alan Wertheimer says that Syd's lawyer Barry Tyerman was around and remembers the transaction. Chances are he has the doc, if it exists. I haven't told Alan that we acquired the film because we have our hands full with Aretha. Need to discuss.

From: Tyerman, Barry [<mailto:BTyerman@jtwamm.com>]
Sent: Wednesday, August 12, 2015 11:01 AM
To: Tom McGuire
Subject: FW: Sydney Pollack; "Amazing Grace"

Tom,

I understand from Warners that you are representing Mr. Elliott and this project, which frankly surprises me given the attitude and disregard for contractual and creative rights he has consistently and routinely exhibited. Contrary to Mr. Elliott's assertion he has no rights to either the name, likeness, biography or results and proceeds of services of Sydney Pollack or Aretha Franklin (among other essential clearances) and he is about to step off the deepest darkest elevator shaft of his life.

Begin forwarded message:

From: Tom McGuire <TMcGuire@wmeentertainment.com>
Subject: RE: Tyerman question #1.
Date: August 12, 2015 at 3:54:05 PM PDT
To: Liesl Copland <LCopland@wmeentertainment.com>
Cc: Tom McGuire Assistant <tmcguire_asst@wmeentertainment.com>, "alan elliott (ucla)" <alanelliott@g.ucla.edu>, "Todd W. Musburger" <todd@musburger.com>, Liesl Copland Assistant <LCopland_Asst@wmeentertainment.com>

I have asked barry what he wants. ball is in his court

Tom McGuire | WME
TMcGuire@wmeentertainment.com
310.248.3022

From: Liesl Copland
Sent: Wednesday, August 12, 2015 3:50 PM
To: Tom McGuire
Cc: Tom McGuire Assistant; alan elliott (ucla); Todd W. Musburger; Liesl Copland Assistant
Subject: Re: Tyerman question #1.

Are we formulating a response? How long do we have?

Sent from my iPhone

Liesl Copland | WME

LCopland@wmeentertainment.com

310.246.3383

On Aug 12, 2015, at 2:29 PM, Tom McGuire
<TMcGuire@wmeentertainment.com> wrote:

Alan: please send all emails to me (you can copy my assistant, but I don't want anything getting lost). You are now sending emails to my assistant and Liesl's assistant.

I have asked Barry what he wants in order for the Estate to support the release. We have our arguments about what rights you have, and he has his arguments about what rights he has. I say put those arguments to the side and lets see what he wants. There isnt really any money. A share of the back end, I would say ok, depending on the amount. And the right to use his name and likeness in the film and in promo/advertising. He should have directing credit, but that will depend on the DGA. You can give his estate a consultation right, or even an approval right, over the use of his image in the film and advertising—as long as there is an agreement that they are supporting the release, they will not be obstructionist, I don't believe.

Tom

Tom McGuire | WME

TMcGuire@wmeentertainment.com

310.248.3022

From: "Tyerman, Barry" <BTyerman@jtwamm.com>

Subject: RE: Sydney Pollack; "Amazing Grace"

Date: August 17, 2015 at 6:24:58 PM PDT

To: 'Tom McGuire' <TMcGuire@wmeentertainment.com>

Cc: "alan elliott (ucla)" (alanelliott@g.ucla.edu)" <alanelliott@g.ucla.edu>, "Todd Musburger (todd@musburger.com)" <todd@musburger.com>, Liesl Copland <LCopland@wmeentertainment.com>

Thanks Tom. I realize that you may not have been made privy to all of the agreements and other commitments your client has made over the years with respect to this project and then “reconsidered”. I believe you will ultimately be made aware that the "standstill" agreement with Ms. Franklin was in fact entered into, among others. It goes without saying that I have the utmost respect for you and WME and I'm sure that you and your agency would not want to be party to the violation of these arrangements.

And as to direct communications with our clients, without debating your ethical analysis, our clients have requested that there be no direct communication and that everything be routed through our offices.

As to the use of Mr. Pollack's name and image, Warners will confirm to you that they did not purport to grant any such rights and, whatever his legal position, Mr. Elliott has volunteered to remove Mr. Pollack's unauthorized and inappropriate credit. Perhaps this is another commitment which he is "reconsidering?"

Thank you. Barry

From: Tom McGuire
<TMcGuire@wmeentertainment.com>

Subject: RE: Sydney Pollack; "Amazing Grace"

Date: August 17, 2015 at 5:41:46 PM PDT

To: "Tyerman, Barry" <BTyerman@jtwamm.com>

Cc: "alan elliot (ucla) (alanelliott@g.ucla.edu)" <alanelliott@g.ucla.edu>, "Todd Musburger (todd@musburger.com)" <todd@musburger.com>, Liesl Copland <LCopland@wmeentertainment.com>

Barry,

I will pass this email on. However, two observations:

1. I am unaware of any "standstill" agreement or other similar agreement that Alan or his production has entered into with Ms. Franklin. I would be happy to be on a call with you and/or her representative(s) to confirm that.
2. I do not believe it is against any ethical laws for Alan to speak directly to anyone involved in this matter. I will advise him that you do not want him to speak to Rachel or any other member of the family.

In addition, I do not know myself that Alan offered to take Mr. Pollack's name off the film, either generally or in the manner in which you suggest. I am passing your email on to Alan.

Tom

Tom McGuire | WME
TMcGuire@wmeentertainment.com
310.248.3022

From: Tyerman, Barry [<mailto:BTyerman@jtwamm.com>]

Date: Monday, August 17, 2015, 5:33 PM

Sent: Monday, August 17, 2015 5:32 PM
To: Tom McGuire
Subject: FW: Sydney Pollack; "Amazing Grace"

Tom,

I know that we have been missing each other. On the chance that it may take some time to connect, please advise your client that, without prejudice, the successors to the rights of Sydney Pollack accept his suggestion to take Mr. Pollack's name off the film, including for the proposed screenings at Toronto. Please have him cease any further use of Mr. Pollack's name, performance or image and, without limiting the generality of the foregoing, delete any and all visual or other references to Mr. Pollack in and in connection with the film.

I understand that quite provocatively Mr. Elliott has flagrantly breached a "standstill" agreement entered into with or on behalf of Aretha Franklin. Clearly not a positive move or one likely to encourage cooperation from anyone. I have been put in contact with her representatives.

Nothing contained herein or our previous correspondence shall be construed as a waiver of any of our clients' rights, positions or remedies, all of which are expressly reserved.

Barry

On Aug 23, 2015, at 2:13 PM, alan elliott <Alan@AlanElliott.net> wrote:

Bill was Sydney's editor. He, Sydney and I worked on the film. (bill cut the original trailer before I engaged JEFF Buchanan- bill might have been the editor but... he got a job in Baton Rouge for a year and during that time I met Buchanan)...

anyway, Bill just called. Donna, Sydney's assistant, had called Bill because Donna is so upset about how barry is mischaracterizing Sydney's involvement in the movie... And Sydney's involvement with me... To the family.

bill's call to me came completely unsolicited. I have not talked to him in a while... Or to Donna... As Donna has a gag order with the family since sydney passed and I knew this so I have been respectful.

but Bill is the one key link who can actually speak as to how much Sydney wanted this to be a "film by Sydney Pollack."

And Bill was apoplectic... As Donna had heard through the grapevine through the girls that things have escalated through barry.

Long story short... 10% is our limit. I wouldn't mind making it 5%.

Bill, Through no pushing from me at all... seriously... no really, seriously... has told the girls how much Sydney enjoyed working with me...

How much Sydney wanted "amazing grace" to be finished...

And how he- Bill- is the only one who can validate all of this to the family...

and to everyone else if there's any questions about it.

and he isn't press shy having done this in 2010 when there was the variety piece (<http://variety.com/2010/music/markets-festivals/grace-film-finally-near-1118013484/>).

thank you.

From: Tom McGuire
Sent: Monday, August 24, 2015 12:46 PM
To: 'Tyerman, Barry'
Subject: RE: Sydney Pollack; "Amazing Grace"

My understanding is that several people have reached out to Alan with no request or attempt to contact them by Alan. Having said that, I am passing your note on to all.

Where are we in terms of our discussion last week? This project is going to Telluride and Toronto.

Tom

From: Tyerman, Barry [<mailto:BTyerman@jtwamm.com>]
Sent: Monday, August 24, 2015 12:37 PM
To: Tom McGuire
Subject: RE: Sydney Pollack; "Amazing Grace"

Tom,

Just as a reminder, this is the status quo.

No rights have been granted to use the name, likeness, performance or biography of Sydney Pollack in

connection with this project and Mr. Elliott specifically agreed to take Mr. Pollack's name off the film, of course without prejudice to our other rights, positions and remedies. Anyone acting inconsistently with this will be held accountable.

And clearly despite your encouragement and what I thought was our understanding, Mr. Elliott continues to pester friends, family and professional colleagues of our late client. Please make sure that this is discontinued.

Thank you. Barry

From: Tyerman, Barry [<mailto:BTyerman@jtwamm.com>]
Sent: Monday, August 24, 2015 1:05 PM
To: Tom McGuire
Subject: RE: Sydney Pollack; "Amazing Grace"

I am not talking about people soliciting Alan, but rather the reverse including, for example, his contacting Mr. Pollack's longtime assistant asking her what credit she would like!

As to our discussions, my recollection is that you were talking to Arnold Reed attempting to make a deal for Ms. Franklin's rights, none of which to our knowledge have been granted to date. If you are able to make a mutually acceptable arrangement you were then going to come to us to attempt to make a deal for Mr. Pollack's rights, absolutely none of which have been granted.

In the interim, wherever the project may go, lawfully or unlawfully, it may not go with the use of any Mr. Pollack's rights and Mr. Elliott specifically committed to take his name off the film, which we have accepted. Please confirm that this has been implemented and that there shall not be any inference in any discussions with any third parties that this is anything but a project not authorized by or on behalf of Sydney Pollack.

Thank you. Barry

From: Tyerman, Barry [<mailto:BTyerman@jtwamm.com>]
Sent: Wednesday, August 26, 2015 11:07 AM

To: Tom McGuire
Subject: RE: Amazing Grace

No mention of Sydney Pollack ANYWHERE (Including publicity, promotion, etc.) and no use of his image. This is all of course without prejudice to our basic position that all of this is uncleared as required by the Warner Bros. clip license.

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor
Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448

From: Tom McGuire [<mailto:TMcGuire@wmeentertainment.com>]
Sent: Wednesday, August 26, 2015 11:04 AM
To: Tyerman, Barry
Subject: Amazing Grace

Hi Barry

Alan is pulling the directed by credit to Sydney off the film. He had planned to give him a producer credit as well (“produced by Alan Elliott, Sydney Pollack and Jerry Wexler”—order for illustrative purposes only, not final).

Do you also want Alan to remove the produced by credit?

Tom

From: Tom McGuire <TMcGuire@wmeentertainment.com>
Subject: RE: i talked with spira...
Date: August 26, 2015 at 4:41:51 PM PDT
To: "alan elliott (ucla)" <alanelliott@g.ucla.edu>

Not being flip, even though it will sound flip: I finished with barry—don't know if we have. Really up to Barry—I do not believe he is taking any aggressive action towards us, he just wants sydney's name off as director and producer, and he wants his name out of publicity. We can only control what we control of the publicity. I assume you are not sending out that epk package—that would drive him crazy.

Tom McGuire | WME
TMcGuire@wmeentertainment.com
310.248.3022

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

Sent: Wednesday, August 26, 2015 4:38 PM

To: Tom McGuire

Cc: Todd Musburger; Liesl Copland

Subject: Re: i talked with spira...

ok! did we finish with barry?

thank you.

From: Tom McGuire <TMcGuire@wmeentertainment.com>

Subject: RE: i talked with spira...

Date: August 26, 2015 at 5:05:51 PM PDT

To: "alan elliott (ucla)" <alanelliott@g.ucla.edu>

No director, producer or any other Sydney credits

Tom McGuire | WME



From: Tom McGuire <TMcGuire@wmeentertainment.com>

Subject: Re: Aretha Franklin Doc 'Amazing Grace' Hosts Secret Screening for Buyers | Variety

Date: September 12, 2015 at 3:53:53 PM PDT

To: Liesl Copland <LCopland@wmeentertainment.com>

Cc: alan elliott <Alan@AlanElliott.net>, Todd Musburger <todd@musburger.com>

There is no pending legal action. There is his new statement that there are unspecified claims

Sent from my iPhone

Tom McGuire | WME

TMcGuire@wmeentertainment.com

310.248.3022

On Sep 12, 2015, at 4:50 PM, Liesl Copland <LCopland@wmeentertainment.com> wrote:

We got it. But what i am saying is, we were asked to tale his name off and we dis and now he is bullying With this other stuff. I need an opinion if the pending legal action is real.

Sent from my iPhone

Liesl Copland | WME

LCopland@wmeentertainment.com

310.246.3383

On Sep 12, 2015, at 6:49 PM, alan elliott <Alan@AlanElliott.net> wrote:

be clear:

sydney's attorney asked for his name off. we took it off. we are not paying him.

honestly, if there is even \$5 less I have to take for putting it back on, I am a pass.

period.

thank you.

phone: 323 988 9692

Sent from me.

On Sep 12, 2015, at 3:46 PM, Tom McGuire <TMcGuire@wmeentertainment.com> wrote:

Todd can we connect tomorrow. I am at a wedding until then. We have a clock so we need to act tomorrow.

Sent from my iPhone

Tom McGuire | WME

TMcGuire@wmeentertainment.com

310.248.3022

On Sep 12, 2015, at 4:40 PM, Liesl Copland <LCopland@wmeentertainment.com> wrote:

He has never mentioned any pending claims. We may have to clarify before i can close and I will need to close tomorrow to keep these levels. Amazon just put a clock on us of 48 hours.

Sent from my iPhone

Liesl Copland | WME

LCopland@wmeentertainment.com

310.246.3383

On Sep 12, 2015, at 5:42 PM, Todd Musburger <todd@musburger.com> wrote:

I will have a go at him on Tuesday...Thanks...

todd w. musburger
Todd W. Musburger, Ltd.
142 E. Ontario
Suite 500
Chicago, Illinois 60611
312 664 2600

On Sat, Sep 12, 2015 at 4:40 PM, Liesl Copland
<LCopland@wmeentertainment.com> wrote:

I am. I have said we cant credit him. What will he do, legally?

Lionsgate interest for world expecting offer.

Sent from my iPhone

Liesl Copland | WME
LCopland@wmeentertainment.com
[310.246.3383](tel:310.246.3383)

On Sep 12, 2015, at 5:29 PM, Tom McGuire
<TMcGuire@wmeentertainment.com> wrote:

FYI

Sent from my iPhone

Tom McGuire | WME
TMcGuire@wmeentertainment.com
[310.248.3022](tel:310.248.3022)

Begin forwarded message:

From: "Tyerman, Barry" <BTyerman@jtwamm.com>
Date: September 12, 2015 at 1:13:21 PM MDT
To: "TMcGuire@wmeentertainment.com"
<TMcGuire@wmeentertainment.com>
Subject: **Aretha Franklin Doc 'Amazing Grace' Hosts Secret Screening for Buyers | Variety**

I trust you will be advising potential buyers that you have no Sydney Pollack rights and in fact that there are pending claims of which everyone should be placed on notice.

<http://variety.com/2015/film/festivals/toronto-aretha-franklin-doc-amazing-grace-holds-secret-screening-for-buyers-exclusive-1201591920/>

Sent from my Android phone using Symantec TouchDown
(www.symantec.com)

From: **Todd Musburger** <todd@musburger.com>
Date: Sun, Sep 13, 2015 at 10:17 AM
Subject: Greetings...

To: Barry Tyerman <BTyerman@jtwamm.com>

Barry: I am one of the attorneys working with Alan Elliott on the Aretha Franklin concert film project. I have been asked by our group to discuss with you the claim that you are making in reference to your client, the Estate of Sidney Pollack. I know this is not an opportune day to engage you, and you might feel that you have fully explained your position several times before. However, I come to you seeking some guidance as to the nature and validity of your claim. I have reviewed the emails you have written to Tom McGuire and Alan Elliott. I know also that at your request the Pollack name has been removed from the movie. I have studied the Quit Claim Deed from Warner Bros., and the existing paperwork concerning Mr. Pollack's payment for the work he performed on this project. I want to accord you every respect, and I feel that there must be something in your possession that we have not seen. It would be of genuine assistance to all of us if you could provide the basis for your claim with the documentation you are relying on. I assure you I will give this matter the priority it deserves. As we all say on occasion, time is of the essence. Cordially, Todd

Todd W. Musburger

here are the highlights (and below more extended). this is ALL i have between barry and me. i will start looking to see if i have more from tom or jordan or you.

august 17, 2015:

As to the use of Mr. Pollack's name and image, Warners will confirm to you that they did not purport to grant any such rights and, whatever his legal position, Mr. Elliott has volunteered to remove Mr. Pollack's unauthorized and inappropriate credit. Perhaps this is another commitment which he is "reconsidering?"

august 11, 2015

Since you have ignored our efforts to address this situation amicably we have no recourse but to engage with Warner Bros., the directors Guild of America and the representatives of Ms. Aretha Franklin and the owners of the underlying musical and other materials to shut down your rogue activities. Presumably you have and will advise the representatives of the Toronto

and will advise the representatives of the Toronto International Film Festival of the serious claims of various interested parties and the accountability of the Festival and all other parties in the chain of any unlawful exploitation of these rights. Please confirm that the Festival has been so advised.

Not only would exhibition of the film violate various statutory and common law rights of our clients, but also constitute a serious and direct violation of the provisions of the applicable agreements of the Directors Guild of America including relating to creative rights and credits and formal grievances are being initiated.

The foregoing obviously is not a complete exposition of the claims against you and any and all other parties participating in the unlawful exploitation of these rights and all rights, positions and remedies are expressly reserved.

july 14, 2015

What you have sent me purports to be an internal Warner Bros. memorandum, not anything like a contract. Neither Sydney nor any representative is even copied on this. If this is what you are relying on for rights, your reliance obviously is wildly unjustified. All rights, positions and remedies reserved. Barry

july 13, 2015

If you will not voluntarily withdraw any exhibition of the film, including in Toronto, we will be required to take our own legal will measures. We are specifically instructed to protect the Sydney Pollack name and not permit its use without authorization nor without the rights of Aretha Franklin being addressed. No matter how good you may believe the film is (not surprising given Sydney's involvement, but it is a misrepresentation to say the completed film was

misrepresentation to say the completed film was
"Directed By" him), we will not permit you to gloss
over these serious legal issues.

All rights, positions and remedies reserved. Barry

june 16, 2015

With due respect Sydney Pollack has ultimate rights to
this film and, as his longtime attorney and Trustee for
his beneficiaries, I hereby instruct you to cease and
desist immediately from any further use of his name on
or in connection with this project. You and any other
person or entity violating his rights will be held fully
accountable. Barry

june 16, 2015

I am not interested in "opening any cans of worms".
Only to protect the rights of Sydney Pollack, both
economic and creative. And to make sure that his work
is not exploited without those issues being addressed and
not over the legal or other objections of Aretha Franklin.
He would never have countenanced that and was very
clear that her rights needed to be addressed before this
work could be exploited in any manner. If you have
contracts to establish that she has given that permission,
it is imperative that those be shared urgently (as well as
any documentation of any arrangements with Sydney
Pollack).

To be clear, you have no rights to utilize any of the
rights of Sydney Pollack, including his name (and
certainly not to credit this film as being "Directed by
Pollack"), without further written agreement from his
successors.

All of this is not exhaustive and is without prejudice to
the other rights, positions and remedies of Mr. Pollack's
successors.

SUCCESSORS.

may 6, 2015

Please send me that contract and your contract with warners or should I ask for the warners contract directly from them?

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448
Email: BTyerman@jtwamm.com

-----Original Message-----

From: alan elliott (ucla) [alanelliott@g.ucla.edu]

Received: Wednesday, 06 May 2015, 1:12PM

To: Tyerman, Barry [BTyerman@jtwamm.com]

Subject: Re: amazing grace links...

Sydney was not correct. there is a contract with Aretha and warner 7arts.

(ps Sydney also failed to mention that the reason the film never got made was because he couldn't sync up the visuals the audio! a small... but important detail.)

I am very hopeful... That Aretha will have a come to Jesus moment at some point... And we are in constant contact... But I am relying on the contract.

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.

On May 6, 2015, at 1:07 PM, Tyerman, Barry <BTyerman@jtwamm.com> wrote:

Sydney was equally clear with me that the Aretha rights had not been cleared. Please send me the documentation so I can take a look. At some point (sooner rather than later) I should also see your agreement with Warners. Thanks.

Does this mean that you have not heard from anyone on behalf of Aretha recently?

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles,
California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448
Email: BTyerman@jtwamm.com

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

Sent: Wednesday, May 06, 2015 1:06 PM

To: Tyerman, Barry

Subject: Re: amazing grace links...

hey barry

as John Calley quite clearly yelled at me at a certain point... "Do you think I would send Sydney Pollack to go film Aretha Franklin if there wasn't a release?!"

the answer is:

there is.

Aretha signed a personal service contract with warner 7 arts (The film company) which wb and Sydney relied upon to make the film.

the man whose responsibility it was to secure all releases for filming, joe Boyd, (joe was director of film music at wb in 1972) has signed a letter re-stating these facts.

as jerry wexler always implored me to do, "check what's in the contract!" (we did, and that's what we are relying upon.)

thank you.

phone: 323 988 9692

Sent from a iPhone

This email... may have been dictated into the iPhone, so please

torgive 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.

On May 6, 2015, at 12:32 PM, Tyerman, Barry
<BTyerman@jtwamm.com> wrote:

Alan,

In your response you did not address the issue of the Aretha Franklin rights. Have you made an arrangement with her? And is there a deal with the record label? There is absolutely no way that the Sydney Pollack rights will be cleared, including any possibility of the film being attributed to him (the whole notion of "Directed by Sydney Pollack" is an issue), unless and until all of this has been worked through and fully documented.

Given the various items to be resolved, all rights, positions and remedies are expressly reserved.

Thanks. Barry

PS. None of these necessary “legalities” reflect on the quality of the project or our collective desire hopefully to see Sydney’s good work finally and respectfully made available to an audience.

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los
Angeles, California 90067
Phone: (310) 553-0305

Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448
Email: BTyerman@jtwamm.com

To: Tyerman, Barry
Subject: Fwd: amazing grace links...

hey barry

I reached out to Sydney's girls through Donna (see Rachel's sweet email below).

as discussed I am taking the film to premiere at telluride.

as of now I am planning on:

directed by Sydney pollack

produced by Sydney pollack and alan Elliott

if the girls have any issues or concerns, please have them contact me. I will try to do what they feel is appropriate re credits.

and if there's any documentation or... anything else that I should know about re: the iteration of the project Sydney and I started on in 2007... or anything from the passed (I'd be very interested to see the 1997 file!) please send it over and let's discuss.

hope this finds you well.

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

(all of which acts are strictly prohibited), and so notify the sender by reply info@alanelliott.net.

Begin forwarded message:

From: Donna Ostroff
<missdo@aol.com>
Date: April 22, 2015 at 3:44:03 PM
PDT
To: "alanelliott@g.ucla.edu"
<alanelliott@g.ucla.edu>
Subject: Fwd: amazing grace links...

From: Rachel Pollack
<rpollack@mac.com>
Date: April 22, 2015 at
2:42:27 PM PDT
To: MissDO@aol.com
Subject: Re: amazing
grace links...

I just watched the trailer and will watch the rest when I get home. What a wonderful wonderful thing he has done!!! How awful if that had just sat there. I am so thankful to him for doing it and I can't wait to see it!!!!

Thanks you so Donna.
Much love to you.

may 5, 2015

I reviewed my file on the project and was reminded that in 1997 we were discussing a possible deal with Warner Bros. but it was not ever completed or executed. The broad strokes were that Warners had proposed a \$150,000 fee and 50% of the net to Sydney Pollack but we responded that Sydney was obviously a "1st dollar gross" participant and therefore a split of traditional net profits would not work. We had also discussed at the time a direct soundtrack album royalty from Warners on the presumed rerelease of the Aretha Franklin record

project and a greater share of home video.

We would also need to discuss and agree how Sydney's work would be credited; given that tragically he was not around to complete the film, simply billing this as "Directed by Sydney Pollack" would be potentially misleading and inappropriate. Prior to any public exhibition I would expect you to extend the courtesy to Mr. Pollack's heirs of their seeing the film and having the right to comment.

And finally have you "made peace" with Aretha Franklin? Sydney clearly would not countenance the film being released in any way without her creative and economic rights and interests being taken into account.

I look forward to your thoughts as a priority.

From: "Tyerman, Barry" <BTyerman@jtwamm.com>
Subject: RE: amazing grace/redford...
Date: January 22, 2015 at 11:14:47 AM PST
To: "Alan@AlanElliott.net" <Alan@AlanElliott.net>

No. It has always been made clear that any exploitation of this material was conditional on a deal being made.

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor
Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448

-----Original Message-----

From: Alan Elliott [Alan@AlanElliott.net]
Received: Thursday, 22 Jan 2015, 10:33AM
To: Tyerman, Barry [BTyerman@jtwamm.com]
Subject: Re: amazing grace/redford...

(according to the wb records... he signed... and got paid!)

(but if there's something you think we are missing... let's do it.)

thank you.

-alan

phone: 323 988 9692

This email 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.

On Jan 22, 2015, at 10:31 AM, Tyerman, Barry <BTyerman@jtwamm.com> wrote:

Shouldn't we first try to make a deal for Sydney's rights in the film?

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor
Los Angeles, California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448

-----Original Message-----

From: alan elliott [alan@alanelliott.net]
Received: Thursday, 22 Jan 2015, 10:27AM
To: Tyerman, Barry [BTyerman@jtwamm.com]
Subject: amazing grace/redford...

barry:

i called as... i am finishing up the "amazing grace" doc... and i want robert redford to read the letter sydney wrote to aretha for the top of the picture.

if it's a no... i will really move on this time... but i feel he is the right choice for it... here's the letter:

attached is a link for "amazing grace."

here's the link:

<https://vimeo.com/91847063>

From: "Tyerman, Barry" <BTyerman@jtwamm.com>
Subject: RE: Sydney Pollack; Aretha Franklin; "Amazing Grace"

Date: July 29, 2014 at 3:31:38 PM PDT

To: alan elliott <Alan@AlanElliott.net>

Sydney obviously produced and directed the original production and no rights were granted to anyone in the results and proceeds of those services. As a result, the film may not be commercially or otherwise exploited in any manner whatsoever unless and until a full and complete agreement is negotiated for those rights, which would include financial arrangements as well as appropriate approvals and controls on the part of Sydney's heirs.

Where are you on the project overall? And specifically where are you with Aretha Franklin?

Barry W. Tyerman, Esq.
Jackoway Tyerman Wertheimer
Austen Mandelbaum Morris & Klein
1925 Century Park East, 22nd Floor Los Angeles,
California 90067
Phone: (310) 553-0305
Firm Fax: (310) 553-5036
Direct Fax: (310) 551-4448
Email: BTyerman@jtwamm.com

From: alan elliott [<mailto:Alan@AlanElliott.net>]

Sent: Tuesday, July 29, 2014 3:14 PM

To: Tyerman, Barry

Subject: Re: Sydney Pollack; Aretha Franklin; "Amazing Grace"

hi barry

this (the tmz) is a bit of... noise.

re: sydney: is there some specific rights i would need from you/the estate?

thank you.

-alan

phone: 323 988 9692

This email 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.

On Jul 29, 2014, at 3:05 PM, Tyerman, Barry

<BTyerman@jtwamm.com> wrote:

Alan,

You will recall our discussions and correspondence a number of years back concerning this project. At that time it was understood and documented that the project would not proceed unless and until we discussed and agreed mutually acceptable economic and other terms for the Sydney Pollack rights. Also, as we discussed, this would all be conditional on your clearing the Aretha Franklin rights, possibly among other individuals appearing in the film and/or on the soundtrack.

Our curiosity was piqued by the attached article which was forwarded to us. Can you please give me an update as to where you are on all this? Thanks. Barry

sydney passed away on may 26, 2008

below is sydney telling barry tyerman to release the files to me (he never did).

From: "Tyerman, Barry" <BTyerman@jtwamm.com>

Subject: RE: Amazing Grace

Date: May 28, 2008 at 11:52:25 AM PDT

To: <Jordii824@cs.com>

Cc: <alan@alanelliott.net>, <Werthie@aol.com>, "Wertheimer, Alan" <AWertheimer@jtwamm.com>

Thanks, Herb. I assume this is being done under the authority of Warners as owners of the raw footage? Good luck with the work. Barry T.

Barry W. Tyerman, Esq.

Jackoway Tyerman Wertheimer

Austen Mandelbaum Morris & Klein

1925 Century Park East, 22nd Floor Los Angeles,
California 90067

Phone: (310) 553-0305

Firm Fax: (310) 553-5036

Direct Fax: (310) 551-4448

Email: BTyerman@jtwamm.com

From: Jordii824@cs.com [<mailto:Jordii824@cs.com>]

Sent: Wednesday, May 28, 2008 10:54 AM

To: Tyerman, Barry

Cc: alan@alanelliott.net; Werthie@aol.com

Subject: Re: Amazing Grace

Barry, I'm very sorry to hear about Mr. Pollack. He was quite gracious in speaking to Alan and enthusiastic about the prospect of us finishing this film. We hope our work will exceed his expectations. Warmest regards, Herb Jordan

I literally have the file in front of me and am happy to answer any questions that you may have.

Unfortunately the file relates principally to the deal in 1997 for Mr. Pollack to complete the editing of the material (as opposed to the original shoot). Please let me know how I can help.

Barry T.

Barry W. Tyerman, Esq.

Jackoway Tyerman Wertheimer

Austen Mandelbaum Morris & Klein

1925 Century Park East, 22nd Floor Los Angeles,
California 90067

Phone: (310) 553-0305

Firm Fax: (310) 553-5036

Direct Fax: (310) 551-4448

Email: BTyerman@jtwamm.com

From: Werthie@aol.com [<mailto:Werthie@aol.com>]

Sent: Wednesday, May 07, 2008 10:21 AM

To: Jordii824@cs.com

Cc: Tyerman, Barry

Subject: Re: Amazing Grace

hi jordan . . . probably best if you contact barry's office directly . . . i've copied him on this email, and our number here is 310-553-0305 . . . hope all's well . . .

werth

Hello Alan. Donna Ostroff from Sydney Pollack's office has relayed that Mr. Pollack has authorized Barry to release the Amazing Grace legal file to Alan Elliott or to me. I'd like to arrange to stop by the office, or if it's more convenient for Barry, have the file sent to my office. The project is moving quickly so it would be helpful if we could make arrangements as soon as possible. All Best, Jordan

Herb Jordan
The Adage Group, LLC
328 South Beverly Drive Suite G
Beverly Hills Ca 90212
310 785 0574
cell 310 613 4517

Begin forwarded message:

From: Donna Ostroff <dostroff@mirageenterprises.com>
Date: March 12, 2008 5:11:58 PM PDT
To: Alan Elliott <Alan@AlanElliott.net>
Subject: Re: thought...

Just got the following reply from Barry Tyerman....

"I have a file on this and have discussed it with Sydneyon many occasions over the years. I am traveling out of the country but will pull my file on my return on Monday."

Let you know when I hear from him.

we just chatted. talked about bill going to see sydneyon wed. and needing to see any files barry might have.
she said she would be happy to tell barry tyerman that sydneyon has given

permission to see the files.

thank you.

-alan

phone: 323 988 9692

peace and love.

<http://songsoundrecord.tumblr.com>

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Fwd: the dispute...
Date: January 20, 2017 at 12:07 PM
To: Todd W. Musburger todd@musburger.com



thank you.

-alan

phone: 323 988 9692
peace and love.

<http://songsoundrecord.tumblr.com>

Begin forwarded message:

From: alan elliott (ucla) <alanelliott@g.ucla.edu>
Subject: the dispute...
Date: January 20, 2017 at 10:39:27 AM PST
To: John Boyd <jwb@fbdlaw.com>

#27 on the attached (below)- that is the question in question. it was answered after conferring with hiscox's joanne richardson, hiscox's counsel ted gerdes re: the new found personal service contract. after discussion, hiscox' joanne richardson wrote in the email:

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 aware of the contract attached and that the insured is relying on this contract/document to make this film. We have vetted it's 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 exclusion that apply regardless and we could never confirm or deny any coverage in advance as each and every claims sencerio 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 tile 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 let me know if you have any further questions.

Best,
Joann

Joanne Richardson, CPCU
Media & Entertainment Practice Leader
Hiscox Partner
Hiscox USA
T 646.452.2355
M 646.823.8092
joanne.richardson@hiscox.com
Connect with Hiscox online

Web 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



amazing grace
App- R...03.doc

thank you.

-alan

phone: 323 988 9692

peace and love.

<http://songsoundrecord.tumblr.com>

thank you.

-alan

phone: 323 988 9692

peace and love

peace and love.

<http://songsoundrecord.tumblr.com>

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Fwd: the dispute...
Date: January 20, 2017 at 12:15 PM
To: Boyd Joe boyd1j@fastmail.com



thank you.

-alan

phone: 323 988 9692
peace and love.

<http://songsoundrecord.tumblr.com>

Begin forwarded message:

From: alan elliott (ucla) <alanelliott@g.ucla.edu>
Subject: the dispute...
Date: January 20, 2017 at 10:39:27 AM PST
To: John Boyd <jwb@fbdlaw.com>

#27 on the attached (below)- that is the question in question. it was answered after conferring with hiscox's joanne richardson, hiscox's counsel ted gerdes re: the new found personal service contract. after discussion, hiscox' joanne richardson wrote in the email:

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 claim 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 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
Connect with Hiscox online

Web 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



amazing grace
App- R...03.doc

thank you.

-alan

phone: 323 988 9692

peace and love.

<http://songsoundrecord.tumblr.com>

thank you.

-alan

phone: 323 988 9692

peace and love

peace and love.

<http://songsoundrecord.tumblr.com>

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Re: the dispute...
Date: January 20, 2017 at 3:41 PM
To: John Boyd JWB@FBDLAW.com



that may have been a phone call with ted gerdes (hiscox attorney) or the broker- where we went over the settlement and it's tangled web.

i showed them all the docs including the settlement agreement- which was/remains up on the online dossier. their wording is "We acknowledge that you raised the issue of Ms. Franklin's consent (and lack thereof) with Hiscox during the policy's underwriting."



Amazing Grace
- Frank...OC.pdf

thank you.

-alan

phone: 323 988 9692
peace and love.

<http://songsoundrecord.tumblr.com>

On Jan 20, 2017, at 3:32 PM, John Boyd <JWB@FBDLAW.com> wrote:

Don't understand the Hiscox situation you're describing. What do you mean "the private settlement was not in place." ???

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Friday, January 20, 2017 4:27 PM
To: John Boyd
Subject: Re: the dispute...

as always, the myriad of deliberate deceptions that she imposed upon me in legally tangled and morally corrupt (and, if i had the contract initially, would never have been able to be tangled).

the FIRST insurance company (chubb) had no settlement.

the SECOND (hiscox) decided that, after discussion with council, that the private settlement was not in place due to the fundamental contract (and, one could argue, because the film was/is still being shown).

thank you.

-alan

phone: 323 988 9692

peace and love.

<http://songsoundrecord.tumblr.com>

On Jan 20, 2017, at 3:21 PM, John Boyd <JWB@FBDLAW.com> wrote:

Just looked at the questionnaire. If Aretha had already sued you and settled on basis that you would not show the film without her permission, and you didn't yet have her permission, the ins. Co. seems to have a defense, no? Why not? I don't understand this, I guess.

From: alan elliott [<mailto:alanelliott@g.ucla.edu>]
Sent: Friday, January 20, 2017 11:39 AM
To: John Boyd
Subject: the dispute...

#27 on the attached (below)- that is the question in question. it was answered after conferring with hiscox's joanne richardson, hiscox's counsel ted gerdes re: the new found personal service contract. after discussion, hiscox' joanne richardson wrote in the email:

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 it's 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 exclusion that apply regardless and we could never confirm or deny any coverage in advance as each and every claims sencerio 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 tile 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 let me know if you have any further questions.

Best,
Joann

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

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: the dispute...
Date: January 20, 2017 at 10:39 AM
To: John Boyd jwb@fbdlaw.com



#27 on the attached (below)- that is the question in question. it was answered after conferring with hiscox's joanne richardson, hiscox's counsel ted gerdes re: the new found personal service contract. after discussion, hiscox' joanne richardson wrote in the email:

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 aware of the contract attached and that the insured is relying on this contract/document to make this film. We have vetted it's 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 exclusion that apply regardless and we could never confirm or deny any coverage in advance as each and every claims sencerio 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 tile 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 let me know if you have any further questions.

Best,
Joann

Joanne Richardson, CPCU
Media & Entertainment Practice Leader
Hiscox Partner
Hiscox USA
T 646.452.2355
M 646.823.8092
joanne.richardson@hiscox.com
Connect with Hiscox online
Web 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



amazing grace
App- R...03.doc

thank you.

-alan

phone: 323 988 9692
peace and love.

<http://songsoundrecord.tumblr.com>

thank you.

-alan

phone: 323 988 9692
peace and love.

<http://songsoundrecord.tumblr.com>

From: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: the insurance letter.
Date: January 12, 2017 at 4:30 PM
To: Boyd Joe boyd1j@yahoo.co.uk



Amazing Grace
- Frank...OC.pdf

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: this email is i think all we have...
Date: February 26, 2016 at 11:05 AM
To: Shaun H. Crosner scrosner@linerlaw.com



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 aware of the contract attached and that the insured is relying on this contract/document to make this film. We have vetted it's 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 exclusion that apply regardless and we could never confirm or deny any coverage in advance as each and every claims sencerio 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 tile 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 let me know if you have any further questions.

Best,
Joann

thank you.

-alan

phone: 323 988 9692

This email 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.

On Jul 22, 2015, at 1:51 PM, Todd Musburger <todd@musburger.com> wrote:

I will

IPhone Transmission Please excuse Typos & Peculiar abbreviations

On Jul 22, 2015, at 3:32 PM, alan elliott (ucla) <alanelliott@g.ucla.edu> wrote:

you want me to not answer this, right?

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.

Begin forwarded message:

From: "Cruz, Harmoni" <harmoni@amazon.com>
Date: July 22, 2015 at 1:20:57 PM PDT
To: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Cc: Todd Musburger <todd@musburger.com>, "Hope, Ted" <ted.hope@amazonstudios.com>, Liesl Copland <LCopland@wmeentertainment.com>, Tom McGuire <tmcguire@wmeentertainment.com>, "Kramer, Josh" <jkramer@amazon.com>, "Heintz, Matthew" <heintz@amazon.com>, "Patel, Ajay" <ajayp@amazon.com>
Subject: RE: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post

Thanks, Alan. I'm looping in Matthew and Ajay from our Amazon legal team as well.

In one of the previous docs, we noted a reference to a legal opinion letter re chain of title for the film. Do you or your agent/broker have this on hand? We'd like to see a copy of the letter to assist with our review.

Thanks,
Harmoni

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Wednesday, July 22, 2015 1:04 PM
To: Cruz, Harmoni
Cc: Todd Musburger; Hope, Ted; Liesl Copland; Tom McGuire; Kramer, Josh
Subject: Fwd: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post

hi harmoni and everone-

as promised... and now delivered... the insurance, no exclusions.

thank you.

-alan

phone: 323 988 9692

This email 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.

Begin forwarded message:

BEGIN FORWARDED MESSAGE.

From: Annette Shavuo <annette.shavuo@aon.com>
Subject: FW: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post
Date: July 22, 2015 at 12:32:48 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Cc: Stephen Carroll <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.

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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

<Binder - EO - 15-18 Amazing Grace.pdf>

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: this email is i think all we have...
Date: July 22, 2015 at 2:13 PM
To: Todd W. Musburger todd@musburger.com



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 aware of the contract attached and that the insured is relying on this contract/document to make this film. We have vetted it's 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 exclusion that apply regardless and we could never confirm or deny any coverage in advance as each and every claims sencerio 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 tile 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 let me know if you have any further questions.

Best,
Joann

thank you.

-alan

phone: 323 988 9692

This email 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.

On Jul 22, 2015, at 1:51 PM, Todd Musburger <todd@musburger.com> wrote:

I will

IPhone Transmission Please excuse Typos & Peculiar abbreviations

On Jul 22, 2015, at 3:32 PM, alan elliott (ucla) <alanelliott@g.ucla.edu> wrote:

you want me to not answer this, right?

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.

Begin forwarded message:

From: "Cruz, Harmoni" <harmoni@amazon.com>
Date: July 22, 2015 at 1:20:57 PM PDT
To: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Cc: Todd Musburger <todd@musburger.com>, "Hope, Ted" <ted.hope@amazonstudios.com>, Liesl Copland <LCopland@wmeentertainment.com>, Tom McGuire <tmcguire@wmeentertainment.com>, "Kramer, Josh" <jkramer@amazon.com>, "Heintz, Matthew" <heintz@amazon.com>, "Patel, Ajay" <ajayp@amazon.com>
Subject: RE: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post

Thanks, Alan. I'm looping in Matthew and Ajay from our Amazon legal team as well.

In one of the previous docs, we noted a reference to a legal opinion letter re chain of title for the film. Do you or your agent/broker have this on hand? We'd like to see a copy of the letter to assist with our review.

Thanks,
Harmoni

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Wednesday, July 22, 2015 1:04 PM
To: Cruz, Harmoni
Cc: Todd Musburger; Hope, Ted; Liesl Copland; Tom McGuire; Kramer, Josh
Subject: Fwd: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post

hi harmoni and everone-

as promised... and now delivered... the insurance, no exclusions.

thank you.

-alan

phone: 323 988 9692

This email 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.

Begin forwarded message:

BEGIN forwarded message.

From: Annette Shavuo <annette.shavuo@aon.com>
Subject: FW: 2700815 Amazing Grace LLC - Conditional Bind - Allow Post
Date: July 22, 2015 at 12:32:48 PM PDT
To: "alanelliott@g.ucla.edu" <alanelliott@g.ucla.edu>
Cc: Stephen Carroll <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.

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

Before you print, think about the ENVIRONMENT 

The information contained in this e-mail is confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail confidential, may be privileged, and is intended for the use of the individual or entity named above. If you, the reader of this message, are not the intended recipient, you are expressly prohibited from copying, disseminating, distributing or in any other way using any of the information contained in this e-mail.

<Binder - EO - 15-18 Amazing Grace.pdf>

From: alan elliott (ucla) alanelliott@g.ucla.edu

Subject: Re: Time response

Date: August 24, 2015 at 8:05 AM

To: Stephen Carroll stephen.carroll@aon.com, Annette Shavuo annette.shavuo@aon.com

Cc: Liesl Copland LCopland@wmeentertainment.com, Tom McGuire tmcguire@wmeentertainment.com, Todd W. Musburger todd@musburger.com



hi stephen and Annette

the essence festival would like to show "amazing grace" next July. can they be added on the coverage or how is that handled?

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.

On Aug 24, 2015, at 7:58 AM, Todd Musburger <todd@musburger.com> wrote:

It could be premature to sign this deal as anxious as we are...the Essence Festival is a material part of it. So, Alan, check with the insurance folks...we need to add Time as an additional insured and we need to see if the policy can cover you for the Essence fest. And Liesl, please confirm for me that you are OK with the language which does state "...at Producer's sole discretion..." Thanks

Todd W. Musburger
Todd W. Musburger, Ltd.
142 E. Ontario
Suite 500
Chicago, Illinois 60611
312 664 2600

----- Forwarded message -----

From: Todd Musburger <todd@musburger.com>

Date: Sat, Aug 22, 2015 at 12:07 PM

Subject: Time response

To: alan elliott <alanelliott@g.ucla.edu>, Liesl Copland <LCopland@wmeentertainment.com>

Please advise...

iPhone Transmission Please excuse Typos & Peculiar abbreviations

Begin forwarded message:

From: Zach McGee <zach@rampante.net>
Date: August 22, 2015 at 11:20:04 AM CDT
To: Todd Musburger <todd@musburger.com>
Subject: Re: Greetings...

Todd:

I spoke with folks here and we can make the 1 EP credit work and go to \$45K on the rights option if we were granted both non-exclusive SVOD and AVOD rights. With respect to the latter, I think the prior term sheet may not have been clear in terms of how we described the various flavors of AVOD and SVOD rights so we have clarified that in this version by adding examples of the services that currently exploit the different rights (i.e., AVOD only, SVOD only and S+AVOD [to refer to the combination of SVOD and AVOD on the same service, not the combination of separate AVOD and SVOD rights]) and breaking out the license fee by type of right.

Please let me know if you have any questions or would like to discuss. Otherwise, please confirm that this version works for your side. Thanks.

Zach

On Thu, Aug 20, 2015 at 8:28 AM, Todd Musburger <todd@musburger.com> wrote:

Zach, I wanted to expedite the process by addressing your suggested changes. We can get a

Zach: I wanted to expedite the process by addressing your suggested changes. we can set a call for this afternoon if need be.

Credits - We are comfortable with either/or but not both, which we believe would be inconsistent with industry standards.

Window - The feeling is that 60 days makes it unlikely a distributor can take it all, so we actually think the 180 helps you.

Pricing - Can go to 45k.

Archives - Your language is fine.

Let me know your thoughts ...thanks again, Todd

Todd W. Musburger
Todd W. Musburger, Ltd.
142 E. Ontario
Suite 500
Chicago, Illinois 60611
[312 664 2600](tel:3126642600)

--
Zach McGee
zach@rampante.net
[\(310\) 773-1972 \(cell\)](tel:3107731972)

From: Charles Chotvacs cchotvacs@ljwllp.com
Subject: RE: update
Date: May 9, 2017 at 11:06 AM
To: alan elliott (ucla) alanelliott@g.ucla.edu
Cc: Lew Loss lloss@ljwllp.com



Alan –

Thank you for the update. Lew currently is out of the office, but he and I will touch base about things tomorrow afternoon and then circle back with you. In the meantime, if you hear anything further from Ms. Comerford, please let us know.

Best regards,

Chuck

CHARLES W. CHOTVACS | LOSS, JUDGE & WARD, LLP

HAMILTON SQUARE | 600 14TH STREET, NW | SUITE 450 | WASHINGTON, DC 20005
DIRECT DIAL: 202.778.4078 | MAIN: 202.778.4060 | FACSIMILE: 202.778.4099
WWW.LJWLLP.COM

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Tuesday, May 09, 2017 12:57 PM
To: Lew Loss; Charles Chotvacs
Subject: update

stephen carroll, the underwriter for aon, has retired.

i talked with laura comerford at aon just now.

she said that aon could NOT provide the requested correspondence with hiscox as it is “private.”

she said she will look into the situation but it is noted that while the rest of the insurance is intact, anything regarding aretha franklin is excluded.

thank you.

-alan

phone: 323 988 9692

peace and love.

Begin forwarded message:

From: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Subject: Fwd: amazing grace; 27700815
Date: May 9, 2017 at 9:47:56 AM PDT
To: laura.comerford@aon.com

thank you.

-alan

phone: 323 988 9692

peace and love.

Begin forwarded message:

From: alan elliott (ucla) <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>

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.

Please consider the environment before printing this e-mail.

This communication, including attachments, is confidential, may be subject to legal privileges, and is intended for the sole use of the addressee. Any use, duplication, disclosure, or dissemination of this communication, other than by the addressee, is prohibited. If you have received this communication in error, please notify the sender immediately and delete or destroy this communication and all copies.

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: Re: update
Date: May 9, 2017 at 11:07 AM
To: Charles Chotvacs cchotvacs@ljwllp.com
Cc: Lew Loss lloss@ljwllp.com



will do.

thank you.

-alan

phone: 323 988 9692

peace and love.

On May 9, 2017, at 11:06 AM, Charles Chotvacs <cchotvacs@ljwllp.com> wrote:

Alan –

Thank you for the update. Lew currently is out of the office, but he and I will touch base about things tomorrow afternoon and then circle back with you. In the meantime, if you hear anything further from Ms. Comerford, please let us know.

Best regards,

Chuck

CHARLES W. CHOTVACS | LOSS, JUDGE & WARD, LLP

HAMILTON SQUARE | 600 14TH STREET, NW | SUITE 450 | WASHINGTON, DC 20005
DIRECT DIAL: 202.778.4078 | MAIN: 202.778.4060 | FACSIMILE: 202.778.4099
WWW.LJWLLP.COM

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

Sent: Tuesday, May 09, 2017 12:57 PM

To: Lew Loss; Charles Chotvacs

Subject: update

stephen carroll, the underwriter for aon, has retired.

i talked with laura comerford at aon just now.

she said that aon could NOT provide the requested correspondence with hiscox as it is “private.”

she said she will look into the situation but it is noted that while the rest of the insurance is intact, anything regarding aretha franklin is excluded.

thank you.

-alan

phone: 323 988 9692

peace and love.

Begin forwarded message:

From: "alan elliott (ucla)" <alanelliott@g.ucla.edu>

Subject: Fwd: amazing grace; 27700815

Date: May 9, 2017 at 9:47:56 AM PDT

To: laura.comerford@aon.com

thank you.

-alan

phone: 323 988 9692

peace and love.

Begin forwarded message:

From: alan elliott (ucla) <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>

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.

Please consider the environment before printing this e-mail.

This communication, including attachments, is confidential, may be subject to legal privileges, and is intended for the sole use of the addressee. Any use, duplication, disclosure, or dissemination of this communication, other than by the addressee, is prohibited. If you have received this communication in error, please notify the sender immediately and delete or destroy this communication and all copies.

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: update
Date: May 9, 2017 at 9:56 AM
To: Lew Loss lloss@ljwllp.com, Charles Chotvacs cchotvacs@ljwllp.com



stephen carroll, the underwriter for aon, has retired.

i talked with laura comerford at aon just now.

she said that aon could NOT provide the requested correspondence with hiscox as it is "private."

she said she will look into the situation but it is noted that while the rest of the insurance is intact, anything regarding aretha franklin is excluded.

thank you.

-alan

phone: 323 988 9692

peace and love.

Begin forwarded message:

From: "alan elliott (ucla)" <alanelliott@g.ucla.edu>
Subject: Fwd: amazing grace; 27700815
Date: May 9, 2017 at 9:47:56 AM PDT
To: laura.comerford@aon.com

thank you.

-alan

phone: 323 988 9692

peace and love.

Begin forwarded message:

From: alan elliott (ucla) <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>

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: alan elliott (ucla) alanelliott@g.ucla.edu 
Subject: Fwd: updated re question #22
Date: July 8, 2015 at 1:43 PM
To: Todd W. Musburger todd@musburger.com



my mistake

I incorrectly filled out the question...

the insurance is all clear (they say).

will get everything in writing tomorrow.

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.

Begin forwarded message:

From: Alan Elliott <alanelliott@ucla.edu>
Date: July 8, 2015 at 1:35:36 PM PDT
To: Stephen Carroll <Stephen.carroll@aon.com>, Annette Shavuo <annette.shavuo@aon.com>
Subject: updated re question #22



amazing
02021...03.doc

thank you.

-alan

phone: 323 988 9692

This email 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.

From: alan elliott (ucla) alanelliott@g.ucla.edu
Subject: WHY DOESN'T ARETHA PAY HER BILLS?- detroit free press
Date: September 17, 2015 at 12:50 PM
To: Stephen Carroll stephen.carroll@aon.com



fyi...

**WHY DOESN'T ARETHA PAY HER BILLS?
THE WORLD KNOWS FRANKLIN IS RICH, FAMOUS, A GREAT SINGER, A DETROIT ICON. BUT
BAD CREDIT IS TARNISHING HER GOLDEN LUSTER.**

Byline/Affiliation:
DAVID ZEMAN, BRIAN MCCOLLUM AND L.L. BRASIER
Free Press Staff Writers

PubDate: Monday, 2/15/1999

Aretha Franklin has won more Grammys than any woman and was among the first inductees into the Rock and Roll Hall of Fame. She owns grand homes in Detroit's posh suburbs and has earned millions from recordings, concerts, films and book contracts.

So why won't she pay her plumber?

Or her florist? Or, for that matter, her caterer, dentists, accountants, lawyers, songwriter, music arranger, moving company, landlords, dressmaker, limo drivers, tax collectors, landscaper, home inspector or even the guardian for her mentally ill son?

Since 1988, more than 30 lawsuits have been filed against Franklin in Oakland and Wayne counties by people seeking payment on bills. In most cases, Franklin paid only after being taken to court, most recently in January.

She and her aides tried to avoid some suits, turning away process servers from palatial homes in Bloomfield Hills and Bloomfield Township. Some creditors gave up. In other cases, Franklin ignored court judgments, forcing them to seek liens on homes or assets.

"I made it as easy for her as I could," Dean Pitcairn, former owner of Hilton Limousine in Ferndale, said of his suit to recoup nearly \$1,900 from Franklin in 1991.

"I think it was the type of thing where they felt if they prolonged it long enough, we would forget about them. It just made me mad because everyone thinks she's a big hero, and she doesn't think twice about stepping on little people."

Franklin, her lawyers and publicists declined to be interviewed for this article, though one noted that Franklin gives generously to good causes.

And that's the puzzle: that a woman who regularly contributes her time and talents to charity, a beloved star with roots in gospel music, can show such disregard for those she owes money to.

While some creditors dismiss Franklin as a spoiled diva, those who have known her for years say the answer is more complicated -- that her lapses may be explained by a distrust of outsiders and deep personal loss.

"She's a wonderful artist who shouldn't be handling her own business, but she does," said Wayne County Circuit Judge Harvey Tennen, who represented Franklin in the 1980s and believes she is overwhelmed by her financial affairs.

"She just doesn't have time for it and she doesn't realize the kind of bad press she gets from not dealing with things like that. She needs a manager, she needs a lawyer, she needs professionals. But she usually doesn't talk to them until it's too late."

Franklin's reputation as a mercurial and enigmatic personality is a common, if hushed, topic in the music industry.

In 1988, Franklin failed to show up to sing for the second of singer George Michael's concerts at the Palace. Four years earlier, she backed out of a Broadway musical based on the life of Mahalia Jackson, for which a judge later ordered her to pay \$230,000 to the show's producer.

Franklin has also sometimes chewed out musicians -- onstage -- during concerts when she felt their playing wasn't up to snuff.

Many industry insiders requested anonymity for this article because, despite her financial reputation, the music superstar is viewed in Detroit with honor, even reverence. Unlike many Detroiters who became celebrities and left

even reverence. Unlike many Detroiters who became celebrities and left, Franklin has lived in the area nearly all her life and is beloved by its residents. It's that same hometown clout, some say, that has allowed her to ignore some debts.

"That was her style. She was above all the mundane activity of paying bills," said David Greenbaum, Franklin's accountant until 1992, when his firm sued Franklin. "She was an artist."

Possible reasons

Tennen and others say Franklin, 56, won't delegate her business affairs because she finds it difficult to trust others. It's a wariness, they say, born of a failed first marriage -- which reportedly included physical abuse -- and exposure to the music industry at a young age. "People have taken advantage of her her whole life," Tennen said.

Others say Franklin assumed more control of her finances after the loss of her father and brother, who served as protective and guiding figures in her career and business affairs.

The Rev. C.L. Franklin died in 1984 after several years in a coma. Aretha Franklin, who returned to Detroit from Los Angeles to be with him, is said to have spent more than \$300,000 on his care. Brother-manager Cecil Franklin died in 1989.

"When the two people you trust and count on are gone, suddenly you're on your own," said Larry Robinson, owner of God's World record store in Detroit. "And suddenly you're working in areas you don't care much about. You love to sing -- not do taxes."

In 1996, Robinson's store helped sell tickets for a Christmas concert Franklin hosted at her late father's New Bethel Baptist Church. Because of a miscalculation by Franklin and church staff, about 1,000 extra tickets were sold -- at \$17.50 each -- leaving a seething swarm of gospel lovers literally out in the cold.

Some people say such goof-ups can be blamed on the flimsy infrastructure of Franklin's camp, a loose-knit coterie of attorneys, publicists and personal coordinators who leave many details in Franklin's hands.

"She really needs somebody else to serve as a buffer," Robinson said. "She's not a bad person. But when you're trying to play every position on the team -- catching and throwing -- it's going to be rough."

Speculation over Franklin's failure to pay bills has become something of a parlor game among the people who have sued her. Her creditors are like a loosely constructed support group; they make condolence calls to new members and swap stories about efforts to collect from the singer.

Rather small amounts

It's not unusual for celebrities to be magnets for lawsuits from plaintiffs looking for a big payday. But the majority of cases against Franklin are for less than \$4,000.

And in interviews with more than 20 people who have sued Franklin, some said they were reluctant plaintiffs. It was not merely the expense of litigation that bothered them. Many said they were fans of Franklin and admired her contributions to music and to Detroit.

Frank Winton, who owned Mark of Excellence Catering in Southfield, sued Franklin in 1988 over a \$2,300 bill for four parties, including one for her birthday. He put off suing for months and hesitated to mention the debt when he saw her at social functions.

"She did a lot of charity work, and I didn't want to embarrass her," Winton said.

Other creditors waited years.

In 1994, Franklin booked seven rooms at the Westin Hotel in Detroit for a scholarship dinner. When her credit-card company wouldn't pay, the hotel sent invoices to Franklin.

In 1997 -- 28 months later -- the Westin sued. The hotel needed a judge's help to reach Franklin, who avoided a process server. She was later ordered to pay \$1,068. She didn't. Westin tried in vain to seize Franklin's wages from Arista, her record label. A Westin lawyer declined to say if Westin ever collected.

Other creditors said their respect for Franklin dissolved when it became clear she would not pay.

"Hey, she should have to pay her bills like everyone else," said Bob Beutel of All Star Limousine in Royal Oak, which recently collected a \$3,652 bill from last summer. Beutel said competitors warned him about Franklin. He said his own lawyer told him, "It's not a matter of if, it's just a matter of when she's going to stiff you."

So every time Franklin used All Star, the driver made her sign a contract promising that if her bill went to court she would pay All Star's legal fees. It did, and she did.

Even so, Beutel said, chasing old bills can wear on a small business.

"How'd you like to go two weeks without being paid? And now you have to bug people about money and they tell you, 'Hey, I'll give it to you next week,' and they don't?"

Discounts, too

Some merchants felt betrayed after babying Franklin with sweet deals, liberal credit or rushed deliveries.

"We gave her a great price," said Bruce Bolton of Breath of Spring Florist in Bloomfield Hills, which sued over \$1,111 for flowers sent to a 1995 Christmas party.

"Sometimes, you write these things off," he said. "But I think I just felt

that she does this to so many people and I didn't want to be among the people she did it to."

In 1988, Orville Brown of Flatrock Bagging rushed a special order of white sand to her swimming pool for a luau. His lawyer said Brown also gave the singer a discount. Invoices were mailed later, with no response.

"Flatrock Bagging is a family-owned deal," said the attorney, Murdoch Hertzog. "This guy is just good as gold. Here he went out of his way to help her make a fine, wonderful event -- and he got stuck."

And then there is attorney Suzanne Dreifus, who in 1989 was appointed guardian for Franklin's adult son, Clarence, a chronic paranoid schizophrenic. Two years later, when Franklin fell more than \$10,000 behind in paying Dreifus for finding foster homes for her son, visiting him and arranging for his medical care, Dreifus sued.

"Her attorney simply said to me, 'She's not going to pay you,' " Dreifus recalled. Dreifus called her own lawyer. "I told him if they come up with 10 cents less, don't even call me.... It was a matter of principle."

But the Aretha Franklin creditors describe is not the woman Tennen, her former lawyer, knows.

Tennen was introduced to Franklin in the early 1980s by her brother, Cecil.

When Franklin asked Tennen to represent her, he told her he had never represented an entertainer.

"So she bought two sets of encyclopedias on entertainment law and gave one to me," Tennen said. "And she said to me, 'We'll learn together, Harvey.' "

"I was always honored to represent her," he said.

"On the other hand, she needed help."

Brian McCollum
Music Writer
Detroit Free Press

313-223-4450

(Note new office address)
160 W. Fort St.
Detroit, MI 48226
thank you.

-alan

phone: 323 988 9692

This email 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.