

From: Bodden Tara Tara.Bodden@HISCOX.com 
Subject: Amazing Grace policy
Date: September 8, 2015 at 3:40 PM
To: Jtanner@fwlaw.com
Cc: alan elliott (ucla) alanelliott@g.ucla.edu



Hi Jack,

Per Alan's request, here is the policy for the film.

Best,

Tara

Tara D. Bodden, Esq.
Senior Vice President, Claims
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Amazing Grace
comple...licy.pdf

From: Bodden Tara Tara.Bodden@HISCOX.com 
Subject: Amazing Grace
Date: September 9, 2015 at 11:56 AM
To: alan elliott (ucla) alanelliott@g.ucla.edu



Hi Alan,

Could you please provide me with any written demands that Aretha Franklin's attorneys have sent to you? You mentioned that they threatened to sue you if you showed it at the Toronto film festival. Often, these types of demands qualify as a claim under the policy.

Thanks. I will be talking to Ted shortly.

Best,

Tara

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From: Bodden Tara Tara.Bodden@HISCOX.com 
Subject: Amazing Grace
Date: September 9, 2015 at 9:10 AM
To: abart@jenner.com
Cc: alan elliott (ucla) alanelliott@g.ucla.edu



Hi Andy,

By way of introduction, I am handling this matter noticed to Hiscox in connection with certain claims asserted by Aretha Franklin in connection with the referenced film. We are currently investigating coverage and I have been in discussion with Alan Elliot. The Hiscox policy is a duty to defend policy which means that Hiscox has the right to appoint counsel in this matter. We do so from our preferred counsel list and provide our clients with choices from our list. In this case, Alan has asked that I reach out to you and let you know what our rates would be for this matter, and while we do not prefer to appoint counsel outside of our list, I told Alan I would reach out to you gauge whether the rates we ordinarily pay would be of interest to you.

In this case, Hiscox would be \$450 for senior partners \$400 for junior partners and \$350 for senior associates and \$300 for junior associates.

Thank in advance for you attention.

Best,

Tara

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process being the concern.

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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

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Amazing Grace
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From: Bodden Tara Tara.Bodden@HISCOX.com 
Subject: Aretha Franklin matter
Date: September 4, 2015 at 3:54 PM
To: alanelliott@g.ucla.edu



Hi Alan,

Thanks for discussing this matter with me this afternoon among the flurry of difficult events. You know have my contact details now. I wanted to let you know that I can move things around on Tuesday to accommodate your schedule up until 4pm, so let me know when you want to chat and I'll make sure I'm available.

Try to have a good weekend.

Best,
Tara

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From: Bodden Tara Tara.Bodden@HISCOX.com 
Subject: Counsel for consideration
Date: September 8, 2015 at 4:10 PM
To: alan elliott (ucla) alanelliott@g.ucla.edu



Hi Alan,

As promised here are a few of our counsel who I think would do a great job. All are much more subtle (frankly) than Lincoln, and all have reputations that precede them.

David Wright Tremaine LLP
www.dwt.com

Kelli Sager in LA
kellisager@dwt.com
(213) 633-6821

Liz McNamara in NY
lizmcnamara.com
212.603.6437

Pryor Cashman LLP
7 Times Square
New York, NY 10036
www.pryorcashman.com

Tom J. Ferber
tferber@pryorcashman.com
(212) 326-0194

Sheppard Mullin Richter & Hampton
1901 Avenue of the Stars, #1600
Los Angeles, CA 90067
(Also NY office)
www.sheppardmullin.com

James Curry
jcurry@smrh.com
(310) 228-2289

Katten Muchin Rosenman LLP
2029 Century Century Park East, Suite 2600
Los Angeles, CA 90067
www.kattenlaw.com

Joel R. Weiner
joel.weiner@kattenlaw.com
(310) 788-4522

Let me know what you think. In the meantime, as I'm sure you'll understand, due to the very

Let me know what you think. In the meantime, as I'm sure you'll understand, due to the very preliminary nature of this matter, Hiscox must respectfully continue to reserve all of our rights, which we acknowledge that Amazing Grace does for its part as well.

Best,
Tara

Tara D. Bodden, Esq.
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From: Bodden Tara Tara.Bodden@HISCOX.com 
Subject: RE: denver court transcript
Date: September 9, 2015 at 11:57 AM
To: alan elliott (ucla) alanelliott@g.ucla.edu

BT

Alan, are you saying you would like Lincoln, rather than any of the other counsel I sent to you, to represent you?

Thanks.

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From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Wednesday, September 09, 2015 11:53
To: Bodden Tara
Subject: Re: denver court transcript

if the insurance will cover it... Which is why wanted him... And you... To know what's up.

thank you.

phone: 323 988 9692

Sent from me.

On Sep 9, 2015, at 11:48 AM, Bodden Tara <Tara.Bodden@HISCOX.com> wrote:

Alan,

Have you asked Lincoln to represent you? Why is he appearing on emails?

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<image001.jpg>

From: alan elliott (ucla) [<mailto:alanelliott@g.ucla.edu>]
Sent: Wednesday, September 09, 2015 11:24
To: Lincoln Bandlow
Cc: Bodden Tara
Subject: denver court transcript

thank you.

-alan

phone: 323 988 9692

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From: Bodden Tara Tara.Bodden@HISCOX.com 
Subject: RE: Retainer
Date: September 11, 2015 at 1:14 PM
To: alan elliott (ucla) alanelliott@g.ucla.edu, Scott T. Rodgers srodgers@fwlaw.com
Cc: Tom McGuire TMcGuire@wmeentertainment.com, Jack Tanner Jtanner@fwlaw.com

BT

Hi Alan,

You first have to satisfy the \$25,000 retention on the policy, beginning from the date of notification. We will pick up costs in excess of the retention.

Thanks, guys.

Best,

Tara

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From: alan elliott (ucla) [mailto:alanelliott@g.ucla.edu]
Sent: Friday, September 11, 2015 12:42
To: Scott T. Rodgers
Cc: Tom McGuire; Jack Tanner; Bodden Tara
Subject: Re: Retainer

hi scott

this was sent to tara bodden (cc'd here) through hiscox who will be handling this payment.

thank you.

-alan

phone: 323 988 9692

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On Sep 11, 2015, at 12:39 PM, Scott T. Rodgers <srodgers@fwlaw.com> wrote:

Alan, I am following up on our agreement regarding a retainer. While we understand that there may be insurance coverage, it was our understanding that the \$10,000 retainer would be paid from monies that were received by you the date of the hearing (9/4), namely \$100,000. When may we expect payment. Scott

Scott Rodgers
Fairfield and Woods, P.C.
1801 California Street, Suite 2600
Denver, Colorado 80202-2645

Direct Dial: (303) 894-4464
Fax: (303) 830-1033
E-Mail: srodgers@fwlaw.com
Web: <http://www.fwlaw.com>

<image001.png>

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