

From: Aldave, Walter N waldave@chubb.com
Subject: RE: 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 7:30 PM
To: Alan Elliott alanelliott@concordbicycle.com

WA

Alan,

I will await your call Friday at 2:00 PM ET.

Best,

Walt

CHUBB

Walter Aldave

Senior Claims Director, North American Financial Lines Claims

82 Hopmeadow Street, Simsbury, CT 06070, USA

O 860-408-2529 F 860-408-2851

E walter.aldave@chubb.com

Chubb. Insured.™

From: Alan Elliott [<mailto:alanelliott@concordbicycle.com>]

Sent: Wednesday, August 09, 2017 10:28 PM

To: Aldave, Walter N <waldave@chubb.com>

Subject: Re: Al's Records and Tapes / Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802] - CHUBB 82213781

hi walter

Friday (8/11) between 2:00 PM – 3:00 PM ET is good.

thank you.

-alan

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

peace and love.

On Aug 9, 2017, at 7:26 PM, Aldave, Walter N <waldave@chubb.com> wrote:

Hi Alan

Hi Alan,

I am available to talk on Friday (8/11) between 2:00 PM – 3:00 PM ET and Wednesday (8/16) between 1:00 PM – 5:00 PM ET. Please let me know if either of those days and times works for you.

Best,

Walt

CHUBB

Walter Aldave

Senior Claims Director, North American Financial Lines Claims

82 Hopmeadow Street, Simsbury, CT 06070, USA

O 860-408-2529 F 860-408-2851

E walter.aldave@chubb.com

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From: Alan Elliott [<mailto:alanelliott@concordbicycle.com>]

Sent: Wednesday, August 09, 2017 10:18 PM

To: Aldave, Walter N <waldave@chubb.com>

Subject: Fwd: Al's Records and Tapes / Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802] - CHUBB 82213781

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](#)
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From: waldave@chubb.com
Subject: Re: "amazing grace" insurance follow up...
Date: May 22, 2014 at 11:22 AM

To: Alan Elliott Alan@AlanElliott.net

Cc: Brian Musburger Brian@musburger.com, Todd W. Musburger todd@musburger.com, Winnie Wong WWong@mmibi.com



8:00 AM PT or 11:00 AM PT on Tuesday work for me.

Thanks,
Walter Adave
Senior Claims Officer
Claims

Chubb & Son, a division of Federal Insurance Company
82 Hopmeadow Street, P.O. Box 2002
Phone: 860-408-2529 | Fax: 860-408-2464 | waldave@chubb.com
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▼ Alan Elliott ---05/22/2014 01:03:25 PM---how is 8 am/10 am/ 11 am on tuesday? thank you.

From: Alan Elliott <Alan@AlanElliott.net>
To: "Todd W. Musburger" <todd@musburger.com>, Brian Musburger <Brian@musburger.com>, Walter Adave <waldave@chubb.com>, Winnie Wong <WWong@mmibi.com>
Date: 05/22/2014 01:03 PM
Re: "amazing grace" insurance follow up...
Subject:

how is 8 am/10 am/ 11 am on tuesday?

thank you.

-alan

phone: 323 988 9692

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On May 22, 2014, at 9:58 AM, Todd Musburger <todd@musburger.com> wrote:

My error...I should have written Tuesday @ 8 am PDT..

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

On Thu May 22 2014 at 11:55 AM Alan Elliott <Alan@alanelliott.net> wrote:

On Thu, May 22, 2014 at 11:39 AM, alan elliott <Alan@alanelliott.net> wrote:

i can NOT do either.

thank you.

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

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On May 22, 2014, at 9:50 AM, Todd Musburger <todd@musburger.com> wrote:

Tomorrow is now out...We could do Tuesday @ 10 am PDT, or Friday, the 30th anytime between 9 and 12 PDT

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

On Thu, May 22, 2014 at 11:39 AM, alan elliott <Alan@alanelliott.net> wrote:

hi everyone:

here is what works for me (all pst):

tomorrow: 8-9:30am

monday: all day

tuesday: 8-9am

wednesday: 8-11am

please let me know when's good.

thank you.

-alan

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

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On May 22, 2014, at 12:42 AM, Winnie Wong <WWong@mmibi.com> wrote:

Hi Alan,

Walter is available on Friday - between 11:00 AM - 12:00 PM ET (8 AM PST) or 2:00 - 3:00 PM ET (11 AM PST).

11AM PST works best for me. Please let me know if this time works for everyone.

Kind regards, Winnie

Winnie Wong
P: [818.933.2735](tel:8189332735)

From: alan elliott [<mailto:Alan@AlanElliott.net>]
Sent: Wednesday, May 21, 2014 4:59 PM
To: Winnie Wong; Walter Adave
Cc: Brian Musburger; Todd W. Musburger
Subject: "amazing grace" insurance follow up...

hi all

can we please coordinate a time to talk?

thank you.
-alan

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

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From: waldave@chubb.com 
Subject: Re: "amazing grace" insurance follow up...
Date: May 22, 2014 at 10:32 AM
To: Todd Musburger todd@musburger.com
Cc: alan elliott Alan@alanelliott.net, Brian Musburger Brian@musburger.com, Winnie Wong WWong@mmibi.com

WA

I can make any of the days and times proposed for next week work. Please let me know what you decide.

Thanks,
Walter Adave
Senior Claims Officer
Claims

Chubb & Son, a division of Federal Insurance Company
82 Hopmeadow Street, P.O. Box 2002
Phone: 860-408-2529 | Fax: 860-408-2464 | waldave@chubb.com
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▼ Todd Musburger ---05/22/2014 12:51:20 PM---Tomorrow is now out...We could do Tuesday @ 10 am PDT, or Friday, the 30th anytime between 9 and 12

From: Todd Musburger <todd@musburger.com>
To: alan elliott <Alan@alanelliott.net>
Cc: Winnie Wong <WWong@mmibi.com>, Walter Adave <waldave@chubb.com>, Brian Musburger <Brian@musburger.com>
Date: 05/22/2014 12:51 PM
Subject: Re: "amazing grace" insurance follow up...

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

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hi everyone:

here is what works for me (all pst):

tomorrow: 8-9:30am
monday: all day
tuesday: 8-9am
wednesday: 8-11am

please let me know when's good.

thank you.

-alan

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

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Walter is available on Friday - between 11:00 AM - 12:00 PM ET (8 AM PST) or 2:00 - 3:00 PM ET (11 AM PST).

11AM PST works best for me. Please let me know if this time works for everyone.

Kind regards, Winnie

Winnie Wong
P: [818.933.2735](tel:8189332735)

From: alan elliott [<mailto:Alan@AlanElliott.net>]
Sent: Wednesday, May 21, 2014 4:59 PM
To: Winnie Wong; Walter Adave
Cc: Brian Musburger; Todd W. Musburger
Subject: "amazing grace" insurance follow up...

hi all

can we please coordinate a time to talk?

thank you.

-alan

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

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From: Aldave, Walter N waldave@chubb.com

Subject: Automatic reply: 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 7:21 PM

To: Alan Elliott alanelliott@concordbicycle.com

WA

I'm sorry to miss your email. Please note that I will be out of the office on business Monday afternoon (8/7), Tuesday (8/8) and Wednesday (8/9) and will not have access to email. I will respond to your email as soon as possible upon my return to the office on Thursday, 8/10. If this is a matter of urgency that requires immediate attention, please contact Gina Cocchiola gcocchiola@chubb.com or 860-408-2450.

Thank you,

Walt Aldave

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From: Aldave, Walter N waldave@chubb.com

Subject: Automatic reply: [EXTERNAL] Fwd: Insured: AI's Records and Tapes /Claim No. 266386/Claimant: Aretha Franklin

Date: May 31, 2018 at 5:31 PM

To: alan elliott Alan@AlanElliott.net



I'm sorry to miss your email. Please be advised that our office is closed for the Memorial Day Holiday and that I am out on business travel from May 29 - May 31. I will be periodically checking email while I am out and will respond to your email as soon as possible.

Thank you,

Walt Aldave



From: Aldave, Walter N waldave@chubb.com 
Subject: RE: Fwd: [EXTERNAL] Insured: Al's Records and Tapes /Claim No. 266386/Claimant: Aretha Franklin
Date: May 22, 2018 at 11:00 AM
To: alan elliott Alan@AlanElliott.net
Cc: Winnie Wong WWong@mmibi.com

Hi Alan,

I am in the process of reviewing the information received from you and will be in contact with you within the next several days.

Best,

Walt Aldave



Walter N. Aldave
 Senior Claim Director, North America Financial Lines Claims

82 Hopmeadow Street, Simsbury, CT 06070, USA
 O 860-408-2529 F 860-408-2851
 E Walter.Aldave@chubb.com



From: alan elliott [<mailto:Alan@AlanElliott.net>]
Sent: Tuesday, May 22, 2018 1:54 PM
To: Aldave, Walter N <waldave@chubb.com>
Cc: Winnie Wong <WWong@mmibi.com>
Subject: [EXTERNAL] Fwd: Insured: Al's Records and Tapes /Claim No. 266386/Claimant: Aretha Franklin

hi walter and winnie

i am checking in on this.

thank you.

-alan

phone: 323 988 9692

peace and love.

Begin forwarded message:

From: alan@alanelliott.net
Subject: FW: Insured: Al's Records and Tapes /Claim No. 266386/Claimant: Aretha Franklin
Date: May 14, 2018 at 10:18:34 AM PDT
To: Walter Aldave <waldave@chubb.com>
Cc: Winnie Wong <WWong@mmibi.com>

hi walter

as you requested, attached are three documents that explain the current situation. (if you wish to see other documents in the two related cases, they are available here:<http://alsrecordsandtapes.com/amazinglaw/wbdocs/>). as you'll see, the 2015 claim Ms. franklin filed against me in colorado is a direct extension/continuation of the 2011 claim she filed in los angeles. warner bros. discovered the contract ms. franklin signed, authorizing it to use the footage, only after that settlement was reached.

since we stipulated to the injunction in colorado, we have offered ms. franklin two separate contracts for exactly what she asked for (and more). (see emails below). she refused those offers and has discontinued all discussions.

thus, we now need to reopen the case to defend the claims she filed against us. we have no other remedy.

we will not reopen the court case without first trying, once again, to make a deal with ms. franklin.

thank you,

alan

From: Cantor, Jon D. [<mailto:JDCantor@dykema.com>]
Sent: Monday, February 08, 2016 5:22 PM
To: Wendy Jaffe (wjaffe@lionsgate.com); Tom McGuire
Subject: Amazing Grace

Wendy/Tom:

I am attaching to this e-mail only those portions of the Agreement that I have redlined. A vast majority of my redlines are for consistency purposes only. As to the balance there are 2 areas of concern that need to be cleared:

1. It appears from the language that all agreements are effective upon the deposit of Summit's money in the Chase Escrow Agreement. That is really not the case. It is not until the money is authorized to be released by Summit to Ms. Franklin; and
2. There has been discussions but no agreement on how Ms. Franklin's name is going to appear in the up-front credits, i.e. "Amazing Grace-Featuring Aretha Franklin" or something similar. I do not want to leave this up for Summit's discretion.

I think absent Tom's comments, if any, I will be good to go. Hopefully we can get this finished and have Ms. Franklin sign this week.

Jon

Jon D. Cantor
Member
JDCantor@dykema.com

213-457-1795 Direct
213-457-1800 Main
855-223-7058 Fax
818-269-9099 Mobile

333 South Grand Avenue, Suite 2100
Los Angeles, California 90071
www.dykema.com

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thank you.

-alan

phone: 323 988 9692

peace and love.



On May 8, 2018, at 11:27 AM, Aldave, Walter N <waldave@chubb.com> wrote:

Good Afternoon Alan,

In follow up to our telephone conversation on 4/25/18, you were going to provide me with a copy of the settlement agreement that you entered into with Aretha Franklin, a copy of the subsequent declaratory relief action filed by Aretha Franklin in Colorado and any other documents relating to the above captioned matter after the settlement for our review for coverage under the Policy. To date I have not received any of this information from you.

Please be advised that upon receipt of the information requested, we will review it and provide you with our coverage position in writing. In the interim, we reserve all rights under the policy and applicable law.

Thanks and best regards,

Walt Aldave

CHUBB

Walter N. Aldave

Senior Claim Director, North America Financial Lines Claims

82 Hopmeadow Street, Simsbury, CT 06070, USA

O 860-408-2529 F 860-408-2851

E Walter.Aldave@chubb.com

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From: alan elliott [<mailto:alan@alanelliott.net>]

Sent: Thursday, May 03, 2018 4:04 PM

To: Aldave, Walter N <waldave@chubb.com>

Subject: Re: [EXTERNAL] Re: AI's Records and Tapes / Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802] - CHUBB 82213781

hi walter

I am checking back with you on this. I have an attorney in Denver name Steven Zansberg who I would like to get on this as soon as possible. Please let me know about next steps.

thank you.

-alan

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

peace and love.

<~WRD000.jpg>

On Apr 25, 2018, at 6:18 AM, Aldave, Walter N <waldave@chubb.com> wrote:

2 PM ET is good. I will await your call.

Thanks,

Walt

CHUBB

Walter Aldave
Senior Claims Director, North American Financial Lines Claims

82 Hopmeadow Street, Simsbury, CT 06070, USA
O 860-408-2529 F 860-408-2851
E walter.aldave@chubb.com

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From: alan elliott [<mailto:alan@alanelliott.net>]
Sent: Tuesday, April 24, 2018 9:34 PM
To: Aldave, Walter N <waldave@chubb.com>
Subject: Re: [EXTERNAL] Re: Al's Records and Tapes / Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802] - CHUBB 82213781

is 2pm est ok?

thank you.

-alan

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

peace and love.

<~WRD000.jpg>

On Apr 24, 2018, at 12:44 PM, Aldave, Walter N <waldave@chubb.com> wrote:

Hi Alan,

I am free tomorrow afternoon, 4//25, between 1:00 PM – 4:00 PM ET. Let me know what time works best for you.

Thanks,

Walt

CHUBB™

Walter Aldave
Senior Claims Director, North American Financial Lines Claims

82 Hopmeadow Street, Simsbury, CT 06070, USA
O 860-408-2529 F 860-408-2851
E walter.aldave@chubb.com

Chubb. Insured.™

From: alan@alanelliott.net [<mailto:alan@alanelliott.net>]
Sent: Tuesday, April 24, 2018 11:39 AM
To: Aldave, Walter N <waldave@chubb.com>
Subject: [EXTERNAL] Re: Al's Records and Tapes / Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802] - CHUBB 82213781

hi walter

are you around sometime today to talk on the phone with me about this? please let me

me you would sometime today to talk on the phone. I'll be back and please let me know.

thank you.

-alan

phone: 323 988 9692

peace and love.

<image001.gif>

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From: Aldave, Walter N waldave@chubb.com
Subject: RE: Re: [EXTERNAL] Al's Records and Tapes / Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802] - CHUBB 82213781
Date: April 24, 2018 at 12:44 PM
To: alan@alanelliott.net

WA

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Thanks,

Walt

CHUBB

Walter Aldave

Senior Claims Director, North American Financial Lines Claims

82 Hopmeadow Street, Simsbury, CT 06070, USA

O 860-408-2529 F 860-408-2851

E walter.aldave@chubb.com

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From: alan@alanelliott.net [mailto:alan@alanelliott.net]

Sent: Tuesday, April 24, 2018 11:39 AM

To: Aldave, Walter N <waldave@chubb.com>

Subject: [EXTERNAL] Re: Al's Records and Tapes / Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802] - CHUBB 82213781

hi walter

are you around sometime today to talk on the phone with me about this? please let me know.

thank you.

-alan

phone: 323 988 9692

peace and love.





On Aug 9, 2017, at 7:30 PM, Aldave, Walter N <waldave@chubb.com> wrote:

Alan,

I will await your call Friday at 2:00 PM ET.

Best,

Walt

CHUBB

Walter Aldave

Senior Claims Director, North American Financial Lines Claims

82 Hopmeadow Street, Simsbury, CT 06070, USA

O 860-408-2529 F 860-408-2851

E walter.aldave@chubb.com

Chubb. Insured.™

From: Alan Elliott [<mailto:alanelliott@concordbicycle.com>]

Sent: Wednesday, August 09, 2017 10:28 PM

To: Aldave, Walter N <waldave@chubb.com>

Subject: Re: Al's Records and Tapes / Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802] - CHUBB 82213781

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Best,

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Walter Aldave

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E walter.aldave@chubb.com

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Sent: Wednesday, August 09, 2017 10:18 PM

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Subject: Fwd: Al's Records and Tapes / Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802] - CHUBB 82213781

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

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From: Aldave, Walter N waldave@chubb.com
Subject: RE: Re: [EXTERNAL] AI's Records and Tapes / Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802] - CHUBB 82213781
Date: April 25, 2018 at 6:18 AM
To: alan elliott alan@alanelliott.net

WA

2 PM ET is good. I will await your call.

Thanks,

Walt

CHUBB

Walter Aldave

Senior Claims Director, North American Financial Lines Claims

82 Hopmeadow Street, Simsbury, CT 06070, USA

O 860-408-2529 F 860-408-2851

E walter.aldave@chubb.com

Chubb. Insured.

From: alan elliott [<mailto:alan@alanelliott.net>]

Sent: Tuesday, April 24, 2018 9:34 PM

To: Aldave, Walter N <waldave@chubb.com>

Subject: Re: [EXTERNAL] Re: AI's Records and Tapes / Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802] - CHUBB 82213781

is 2pm est ok?

thank you.

-alan

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

peace and love.



On Apr 24, 2018, at 12:44 PM, Aldave, Walter N <waldave@chubb.com> wrote:

Hi Alan

Hi Alan,

I am free tomorrow afternoon, 4//25, between 1:00 PM – 4:00 PM ET. Let me know what time works best for you.

Thanks,

Walt

CHUBB

Walter Aldave

Senior Claims Director, North American Financial Lines Claims

82 Hopmeadow Street, Simsbury, CT 06070, USA

O 860-408-2529 F 860-408-2851

E walter.aldave@chubb.com

Chubb. Insured.™

From: alan@alanelliott.net [<mailto:alan@alanelliott.net>]

Sent: Tuesday, April 24, 2018 11:39 AM

To: Aldave, Walter N <waldave@chubb.com>

Subject: [EXTERNAL] Re: AI's Records and Tapes / Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802] - CHUBB 82213781

hi walter

are you around sometime today to talk on the phone with me about this? please let me know.

thank you.

-alan

phone: 323 988 9692

peace and love.

<image001.gif>

On Aug 9, 2017, at 7:30 PM, Aldave, Walter N
<waldave@chubb.com> wrote:

Alan,

I will await your call Friday at 2:00 PM ET.

Best,

Walt

CHUBB

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O 860-408-2529 F 860-408-2851

E walter.aldave@chubb.com

Chubb. Insured.™

From: Alan Elliott [<mailto:alanelliott@concordbicycle.com>]

Sent: Wednesday, August 09, 2017 10:28 PM

To: Aldave, Walter N <waldave@chubb.com>

Subject: Re: Al's Records and Tapes / Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802] - CHUBB 82213781

hi walter

Friday (8/11) between 2:00 PM – 3:00 PM ET is good.

thank you.

-alan

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

peace and love.

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Hi Alan,

I am available to talk on Friday (8/11) between 2:00 PM – 3:00 PM ET and Wednesday (8/16) between 1:00 PM – 5:00 PM ET. Please let me know if either of those days and times works for you.

Best,

Walt

CHUBB

Walter Aldave

Senior Claims Director, North American Financial Lines
Claims

82 Hopmeadow Street, Simsbury, CT 06070, USA
O 860-408-2529 F 860-408-2851
E walter.aldave@chubb.com

Chubb. Insured.™

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[<mailto:alanelliott@concordbicycle.com>]

Sent: Wednesday, August 09, 2017 10:18 PM

To: Aldave, Walter N <waldave@chubb.com>

Subject: Fwd: Al's Records and Tapes / Amazing Grace,
LLC adv. Aretha Franklin / Hiscox reference no. 170001444
[CC-US1.FID360802] - CHUBB 82213781

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.

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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

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From: Aldave, Walter N waldave@chubb.com 
Subject: RE: Re: [EXTERNAL] Insured: Al's Records and Tapes /Claim No. 266386/Claimant: Aretha Franklin
Date: June 8, 2018 at 5:41 AM
To: alan elliott Alan@AlanElliott.net
Cc: Winnie Wong WWong@mmibi.com

Hi Alan,

Please let me know your availability for a call on Wednesday, 6/13, between 10:00 AM – 4:00 PM ET.

Thanks and best regards,

Walt

CHUBB

Walter N. Aldave
Senior Claim Director, North America Financial Lines Claims

82 Hopmeadow Street, Simsbury, CT 06070, USA
O 860-408-2529 F 860-408-2851
E Walter.Aldave@chubb.com

Chubb. Insured.™

From: alan elliott [<mailto:Alan@AlanElliott.net>]
Sent: Thursday, June 07, 2018 8:40 PM
To: Aldave, Walter N <waldave@chubb.com>
Cc: Winnie Wong <WWong@mmibi.com>
Subject: [EXTERNAL] Re: Insured: Al's Records and Tapes /Claim No. 266386/Claimant: Aretha Franklin

hi walter (and winnie)

i am checking on this.

thank you.

-alan

phone: 323 988 9692

peace and love.



On May 14, 2018, at 10:18 AM, alan@alanelliott.net wrote:

hi walter

as you requested, attached are three documents that explain the current situation. (if you wish to see other documents in the two related cases, they are available here:<http://alsrecordsandtapes.com/amazinglaw/wbdocs/>). as you'll see, the 2015 claim Ms. franklin filed against me in colorado is a direct extension/continuation of the 2011

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thus, we now need to reopen the case to defend the claims she filed against us. we have no other remedy.

we will not reopen the court case without first trying, once again, to make a deal with ms. franklin.

thank you,

alan

From: Cantor, Jon D. [<mailto:JDCantor@dykema.com>]
Sent: Monday, February 08, 2016 5:22 PM
To: Wendy Jaffe (wjaffe@lionsgate.com); Tom McGuire
Subject: Amazing Grace

Wendy/Tom:

I am attaching to this e-mail only those portions of the Agreement that I have redlined.
A vast majority of my redlines are for consistency purposes only.
As to the balance there are 2 areas of concern that need to be cleared:

1. It appears from the language that all agreements are effective upon the deposit of Summit's money in the Chase Escrow Agreement. That is really not the case. It is not until the money is authorized to be released by Summit to Ms. Franklin; and
2. There has been discussions but no agreement on how Ms. Franklin's name is going to appear in the up-front credits, i.e. "Amazing Grace-Featuring Aretha Franklin" or something similar. I do not want to leave this up for Summit's discretion.

I think absent Tom's comments, if any, I will be good to go.
Hopefully we can get this finished and have Ms. Franklin sign this week.

Jon

<image001.jpg>

Jon D. Cantor Member JDCantor@dykema.com	213-457-1795 Direct 213-457-1800 Main 855-223-7058 Fax 818-269-9099 Mobile	333 South Grand Avenue, Suite 2100 Los Angeles, California 90071 www.dykema.com
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thank you.

-alan

phone: 323 988 9692

peace and love.

<Attachment-1.gif>

On May 8, 2018, at 11:27 AM, Aldave, Walter N <waldave@chubb.com> wrote:

Good Afternoon Alan,

In follow up to our telephone conversation on 4/25/18, you were going to provide me with a copy of the settlement agreement that you entered into with Aretha Franklin, a copy of the subsequent declaratory relief action filed by Aretha Franklin in Colorado and any other documents relating to the above captioned matter after the settlement for our review for coverage under the Policy. To date I have not received any of this information from you.

Please be advised that upon receipt of the information requested, we will review it and provide you with our coverage position in writing. In the interim, we reserve all rights under the policy and applicable law.

Thanks and best regards,

Walt Aldave

CHUBB

Walter N. Aldave

Senior Claim Director, North America Financial Lines Claims

82 Hopmeadow Street, Simsbury, CT 06070, USA
O 860-408-2529 F 860-408-2851
E Walter.Aldave@chubb.com

Chubb. Insured.™

From: alan elliott [<mailto:alan@alanelliott.net>]

Sent: Thursday, May 03, 2018 4:04 PM

To: Aldave, Walter N <waldave@chubb.com>

Subject: Re: [EXTERNAL] Re: Al's Records and Tapes / Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802] - CHUBB 82213781

hi walter

I am checking back with you on this. I have an attorney in Denver name Steven Zansberg who I would like to get on this as soon as possible. Please let me know about next steps.

thank you.

-alan

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

peace and love.



On Apr 25, 2018, at 6:18 AM, Aldave, Walter N <waldave@chubb.com> wrote:

2 PM ET is good. I will await your call.

Thanks,

Walt

CHUBB

Walter Aldave

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E walter.aldave@chubb.com

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From: alan elliott [<mailto:alan@alanelliott.net>]
Sent: Tuesday, April 24, 2018 9:34 PM
To: Aldave, Walter N <waldave@chubb.com>
Subject: Re: [EXTERNAL] Re: Al's Records and Tapes / Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802] - CHUBB 82213781

is 2pm est ok?

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Thanks,

Walt

CHUBB™

Walter Aldave
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O 860-408-2529 F 860-408-2851
E walter.aldave@chubb.com

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From: alan@alanelliott.net [<mailto:alan@alanelliott.net>]
Sent: Tuesday, April 24, 2018 11:39 AM
To: Aldave, Walter N <waldave@chubb.com>
Subject: [EXTERNAL] Re: Al's Records and Tapes / Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802] - CHUBB 82213781

hi walter

are you around sometime today to talk on the phone with me about this? please let me know.

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-alan

phone: 323 988 9692

peace and love.

<image001.gif>

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<First Amended Complaint for a Declaratory Judgment and Preliminary and Permanent Injunctive Relief (w-Exhs 1-9) - 09-13-15.pdf>

<signed settlement agreement resolving los angeles case.pdf>

<Order Granting Stipulated Motion for Permanent Injunction [Doc.32].pdf>

From: Aldave, Walter N waldave@chubb.com 
Subject: RE: Re: [EXTERNAL] Insured: Al's Records and Tapes /Claim No. 266386/Claimant: Aretha Franklin
Date: June 8, 2018 at 7:31 AM
To: alan elliott alan@alanelliott.net
Cc: Winnie Wong WWong@mmibi.com

Perfect, I will call you at 11:30 AM ET on Wednesday, 6/13. Please note that we will have our written position to you next week.

Best,

Walt Aldave

CHUBB

Walter N. Aldave
Senior Claim Director, North America Financial Lines Claims

82 Hopmeadow Street, Simsbury, CT 06070, USA
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E Walter.Aldave@chubb.com

Chubb. Insured.™

From: alan elliott [<mailto:alan@alanelliott.net>]
Sent: Friday, June 08, 2018 10:15 AM
To: Aldave, Walter N <waldave@chubb.com>
Cc: Winnie Wong <WWong@mmibi.com>
Subject: Re: [EXTERNAL] Re: Insured: Al's Records and Tapes /Claim No. 266386/Claimant: Aretha Franklin

hi walter

6/13 at 11am est is a good time for me.

prior to this, are there any other questions?

if not, is there an official position which i can have in writing please?

please let me know.

thank you.

-alan

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

peace and love.

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Subject: [EXTERNAL] Re: Insured: Al's Records and Tapes /Claim No. 266386/Claimant: Aretha Franklin

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<image001.gif>

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E walter.aldave@chubb.com

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From: alan@alanelliott.net [mailto:alan@alanelliott.net]
Sent: Tuesday, April 24, 2018 11:39 AM
To: Aldave, Walter N <waldave@chubb.com>
Subject: [EXTERNAL] Re: Al's Records and Tapes / Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802] - CHUBB 82213781

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Subject: RE: Re: [EXTERNAL] Insured: Al's Records and Tapes /Claim No. 266386/Claimant: Aretha Franklin
Date: June 13, 2018 at 6:27 AM
To: alan elliott alan@alanelliott.net
Cc: Winnie Wong WWong@mmibi.com

Good morning Alan,

Unfortunately, I have to re-schedule our call scheduled for this morning. I am available tomorrow, 6/14, at 11:30 AM ET and 2:00 PM – 4:30 PM ET? Let me know a time that works best for you.

Thanks,

Walt

CHUBB

Walter N. Aldave
Senior Claim Director, North America Financial Lines Claims

82 Hopmeadow Street, Simsbury, CT 06070, USA
O 860-408-2529 F 860-408-2851
E Walter.Aldave@chubb.com

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From: Aldave, Walter N
Sent: Friday, June 08, 2018 10:31 AM
To: 'alan elliott' <alan@alanelliott.net>
Cc: Winnie Wong <WWong@mmibi.com>
Subject: RE: [EXTERNAL] Re: Insured: Al's Records and Tapes /Claim No. 266386/Claimant: Aretha Franklin

Perfect, I will call you at 11:30 AM ET on Wednesday, 6/13. Please note that we will have our written position to you next week.

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From: alan elliott [<mailto:alan@alanelliott.net>]
Sent: Friday, June 08, 2018 10:15 AM
To: Aldave, Walter N <waldave@chubb.com>
Cc: Winnie Wong <WWong@mmibi.com>
Subject: Re: [EXTERNAL] Re: Insured: Al's Records and Tapes /Claim No. 266386/Claimant: Aretha Franklin

hi walter

6/13 at 11am est is a good time for me.

prior to this, are there any other questions?

if not, is there an official position which i can have in writing please?

please let me know.

thank you.

-alan

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

neace and love

peace and love.



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E Walter.Aldave@chubb.com

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From: alan elliott [<mailto:Alan@AlanElliott.net>]
Sent: Thursday, June 07, 2018 8:40 PM
To: Aldave, Walter N <waldave@chubb.com>
Cc: Winnie Wong <WWong@mmibi.com>
Subject: [EXTERNAL] Re: Insured: Al's Records and Tapes /Claim No. 266386/Claimant: Aretha Franklin

hi walter (and winnie)

i am checking on this.

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-alan

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<image001.gif>

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From: Cantor, Jon D. [<mailto:JDCantor@dykema.com>]
Sent: Monday, February 08, 2016 5:22 PM
To: Wendy Jaffe (wjaffe@lionsgate.com); Tom McGuire
Subject: Amazing Grace

Wendy/Tom:

I am attaching to this e-mail only those portions of the Agreement that I have redlined. A vast majority of my redlines are for consistency purposes only. As to the balance there are 2 areas of concern that need to be cleared:

1. It appears from the language that all agreements are effective upon the deposit of Summit's money in the Chase Escrow Agreement. That is really not the case. It is not until the money is authorized to be released by Summit to Ms. Franklin; and
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I think absent Tom's comments, if any, I will be good to go. Hopefully we can get this finished and have Ms. Franklin sign this week.

Jon

<image001.jpg>

Jon D. Cantor Member JDCantor@dykema.com	213-457-1795 Direct 213-457-1800 Main 855-223-7058 Fax 818-269-9099 Mobile	333 South Grand Avenue, Suite 2100 Los Angeles, California 90071 www.dykema.com
---	---	---

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phone: 323 988 9692

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<Attachment-1.gif>

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Subject: Re: [EXTERNAL] Re: Al's Records and Tapes / Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802] - CHUBB 82213781

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thank you.

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Sent: Tuesday, April 24, 2018 9:34 PM
To: Aldave, Walter N <waldave@chubb.com>
Subject: Re: [EXTERNAL] Re: Al's Records and Tapes / Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802] - CHUBB 82213781

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<~WRD000.jpg>

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Subject: RE: Re: [EXTERNAL] Insured: Al's Records and Tapes /Claim No. 266386/Claimant: Aretha Franklin
Date: June 14, 2018 at 10:48 AM
To: alan elliott alan@alanelliott.net

Alan,

Please advise what number I should call you at.

Thanks,

Walt

CHUBB

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Sent: Wednesday, June 13, 2018 10:09 AM
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Cc: Winnie Wong <WWong@mmibi.com>
Subject: Re: [EXTERNAL] Re: Insured: Al's Records and Tapes /Claim No. 266386/Claimant: Aretha Franklin

let's schedule 2pm tomorrow est please.

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<image001.gif>

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Jon D. Cantor Member JDCantor@dykema.com	213-457-1795 Direct 213-457-1800 Main 855-223-7058 Fax 818-269-9099 Mobile	333 South Grand Avenue, Suite 2100 Los Angeles, California 90071 www.dykema.com
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peace and love.

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Subject: Re: [EXTERNAL] Re: AI's Records and Tapes / Amazing Grace, LLC adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-US1.FID360802] - CHUBB 82213781

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<signed settlement agreement resolving los angeles case.pdf>

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From: waldave@chubb.com 
Subject: Fw: Insured: Al's Records and Tapes; Amazing Grace Movie, LLC/Claim No. 266386/Plaintiff: Aretha Franklin
Date: November 30, 2012 at 7:28 AM
To: Alan@alanelliott.net



Dear Alan,

Please provide the information requested in the email below. Your prompt attention is greatly appreciated.

Thanks,

Walt Aldave



Walter Aldave • Senior Claims Officer • Chubb Pro Claims • Chubb Group of Insurance Companies
82 Hopmeadow Street • Simsbury, CT 06070 • Phone: 860-408-2529 • Fax: 860-408-2851 • waldave@chubb.com

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----- Forwarded by Walter N Aldave/ChubbMail on 11/30/2012 10:25 AM -----

From: Walter N Aldave/ChubbMail
To: Alan@alanelliott.net
Date: 10/23/2012 04:18 PM
Subject: Insured: Al's Records and Tapes; Amazing Grace Movie, LLC/Claim No. 266386/Plaintiff: Aretha Franklin

Dear Alan,

In follow up to our telephone conversation a few moments ago, it is our understanding that the above captioned matter was voluntarily dismissed by the Plaintiff shortly after it was filed. Please provide a copy of the order dismissing the lawsuit in the above captioned matter along with copies of all of attorney George Rush's invoices for his defense work on this matter. If the total amount incurred in defense expenses is not in excess of your \$10,000 retention, please advise us same and there is no need to provide us with copies of the invoices.

Your prompt attention to this matter is greatly appreciated.

Thanks and best regards,

Walt Aldave



Walter Aldave | Senior Claims Officer | Chubb Pro Claims
Chubb Specialty Insurance | 82 Hopmeadow Street, Simsbury, CT 06070
 : 860-408-2529 |  : 860-408-2851 |  : waldave@chubb.com

From: waldave@chubb.com 
Subject: Insured: Al's Records and Tapes; Amazing Grace Movie, LLC/Claim No. 266386/Plaintiff: Aretha Franklin
Date: October 23, 2012 at 1:18 PM
To: Alan@alanelliott.net

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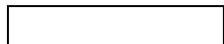
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On Apr 24, 2018, at 12:44 PM, Aldave, Walter N <waldave@chubb.com> wrote:

Hi Alan,

I am free tomorrow afternoon, 4//25, between 1:00 PM – 4:00 PM ET.
Let me know what time works best for you.

Thanks,

Walt

CHUBB

Walter Aldave

Senior Claims Director, North American Financial Lines Claims

82 Hopmeadow Street, Simsbury, CT 06070, USA

O 860-408-2529 F 860-408-2851

E walter.aldave@chubb.com

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From: alan@alanelliott.net [<mailto:alan@alanelliott.net>]

Sent: Tuesday, April 24, 2018 11:39 AM

To: Aldave, Walter N <waldave@chubb.com>

Subject: [EXTERNAL] Re: Al's Records and Tapes / Amazing Grace, LLC
adv. Aretha Franklin / Hiscox reference no. 170001444 [CC-
US1.FID360802] - CHUBB 82213781

hi walter

are you around sometime today to talk on the phone with me about this? please let me know.

thank you.

-alan

phone: 323 988 9692

peace and love.

<image001.gif>

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From: waldave@chubb.com 
Subject: Insured: Al's Records and Tapes/Claim No. 266386/Plaintiff: Aretha Franklin
Date: September 26, 2011 at 11:02 AM
To: Alan@alanelliott.net



Alan,

In follow up to our telephone conversation Friday Afternoon (9/23/11), please be advised that in my internal inquiry regarding the suggestion of counsel for the above captioned matter, here is the contact information for three law firms that we would suggest you reach out to:

Leopold Petrich & Smith
Contact: Lou Petrich
Ph#: 310-277-3333

Davis Wright Tremaine
Contact: Laura Handman
ph#: 213-633-6800

Glaser Weil Finks Jacobs Howard Avchen & Shapiro
Contact: Craig Marcus
ph#: 310-553-3000

Please note that we have rate agreements with the first two firms and do not have a rate agreement with the third firm. Please note that Finally, please note that since we have just recently received notice of this Claim, we have not yet completed our coverage analysis. In the interim, we reserve all rights under the Policy and applicable law.

Thanks and regards,

Walt Aldave



Walter Aldave | Senior Claims Officer | Chubb Pro Claims
Chubb Specialty Insurance | 82 Hopmeadow Street, Simsbury, CT 06070
 : 860-408-2529 |  : 860-408-2851 |  : waldave@chubb.com