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OF

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August 8, 2014

Irma Limenis  
130 67th Street  
Brooklyn, NY 11220

Re: McLoughlin, Laura v. Berkovich, Mark  
Our File No.:

Dear Ms. Limenis:

I am contacting you in connection with the lawsuit that was filed against you. Your insurance carrier LIBERTY MUTUAL a Division of Liberty Mutual Group, has requested that, the Law Office of Harris, King & Fodera, represent you in this case. We are serving an answer on your behalf.

Please do not discuss this case or provide any related information to anyone other than authorized representatives of your insurance carrier or our office. If anyone other than a representative of Liberty Mutual Group or this office should attempt to contact you regarding this accident or lawsuit, simply refer them directly to our office without further comment. Please review your records in this matter and send us a copy of any accident report, the name, address and telephone number of any witnesses and any other relevant material in your possession.

Please note that it is very important that we have your correct address, telephone numbers and e-mail address where we may contact you during business and evening hours. The court will be scheduling examinations before trial of all parties to this action and it will be necessary for this office to advise you of the scheduled date and time.

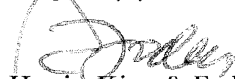
For information regarding the status of this matter, please do not hesitate to contact me. Where appropriate, some services may be performed by other staff attorneys, paralegals or other staff members. Bear in mind that this case may be in suit for several years; therefore it is important that you keep us informed of any changes to your contact information.

It should also be noted that all of the attorneys employed in this office are full-time, salaried employees of Liberty Mutual Insurance Group. We are, however, bound by the Rules of Professional Conduct and will represent you fully and fairly with undivided fidelity to you and your interests. If you have any concerns about our representation, please contact the undersigned.

Please be aware that although we represent your interests, pursuant to the insurance policy, we have an obligation to keep Liberty Mutual Insurance Group apprised of developments in this case. We will periodically send the insurer reports and information pertaining to the defense of this case. We will not normally provide you with all of these reports but we will keep you advised of significant developments. I am personally available to discuss any aspect of this case with you and can provide file materials to you at your request.

We are looking forward to working with you in the defense of this lawsuit.

Very truly yours,



Harris, King & Fodera

Richard J. Fodera

Telephone: 212-487-9701

**PLEASE REVIEW, SIGN AND RETURN FORM TO THIS OFFICE**  
**CLIENT QUESTIONNAIRE**

**RE MCLOUGHLIN, LAURA V. BERKOVICH, MARK**  
**Our File #:**

1. Your Name, Business, Address and Title if you are appearing as a representative of a corporation.

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2. Phone Number: \_\_\_\_\_

3. Name, Address and Phone Number of the person most knowledgeable about this incident, if not you

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4. Home Phone#: \_\_\_\_\_ Business Phone#: \_\_\_\_\_

E-mail address#: \_\_\_\_\_ Cell Phone#: \_\_\_\_\_

5. Names , addresses, phone numbers of all witnesses:

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6. If you have any other insurance over and above your primary insurance with Liberty Mutual Group which might cover this incident, including an umbrella or excess policy, please list the name and address of the insurance company, its policy number and amount of coverage; if you do not have any other coverage please state:

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7. PLEASE SUPPLY THE FOLLOWING:

- A. Photographs with regard to the incident, if any
- B. Repair bills or estimates for any damage.
- C. Accident reports prepared in the regular course of business.
- D. Any statement from anyone with regard to this.
- E. Please indicate owner of premises where incident occurred if different from defendant named in lawsuit.
- F. Any other documents or information which you feel is relevant.

- G. Any contracts, leases, deeds or other agreements which may relate to this incident.
- H. Any video or surveillance report.

DATE: \_\_\_\_\_

SIGNATURE \_\_\_\_\_