

# Butler | Kahn

*We help people and families.*

October 4, 2022

**VIA UPS Overnight Delivery**

**Tracking No. 1ZLT7E350115588234**

**VIA FAX: (608) 373-7383**

**VIA FAX: (866) 447-4293**

Allstate Insurance Company

ATTN: [REDACTED]

PO Box 2874

Clinton, IA 52733

Re: My Client: [REDACTED]  
Your Insured: [REDACTED]  
Policy No.: [REDACTED]  
Claim No.: [REDACTED]  
Date of Injury: May 8, 2022

Ms. [REDACTED]

On May 12, 2022, our office asked Allstate to disclose “every policy of insurance you have issued that does *or may* provide coverage for this wreck” under O.C.G.A. § 33-3-28. (Emphasis in original). On May 23, 2022, Allstate responded under oath and disclosed, as to bodily injury coverage, only a liability insurance policy of \$300,000.

It has since come to our attention, from sources other than Allstate, that Allstate’s disclosure of insurance coverage was not accurate. It appears that Allstate’s disclosure omitted an umbrella policy of \$2,000,000.

Please provide all documentation related to that umbrella policy – including but not limited to the declaration pages, the policy itself, and any correspondence relating to coverage – to our office by tomorrow, October 5, 2022. Please email that documentation to [REDACTED]

[REDACTED] If you prefer, in addition, you can fax the information to our firm at (678) 306-4646.

Simultaneously, to the extent that they exist, please disclose every additional policy of insurance that Allstate (or any of its affiliates, parents, or subsidiaries) has issued that does *or may* provide coverage for this collision.

Cordially,

*/s/ Jeb Butler*  
Jeb Butler