**THOMAS FIRE**

**REQUEST FOR PRODUCTION OF DOCUMENTS**

**CLIENT WORKSHEET**

**Attorney-Client Privileged**

**Instructions:** This form is designed to help you sort through your materials and to give an accurate and true response to the document request served by Edison. We will prepare your final answers and attach your documents, but you are required to sign a "Verification" under penalty of perjury that will be attached to the end of the response. Therefore, please take care to review the following categories carefully and to list any documents you believe are responsive whether or not you are currently in possession of them. Some documents can be obtained (e.g. medical records, deeds). Others may have been destroyed and are not able to be duplicated. You should simply state why you do not have the documents currently and whether you are attempting to get a copy of them.

These documents help to prove your damages. The more you can provide, the better.

We can supplement your responses; however, please try to collect as many items as possible at the outset so that repeated supplements are not required.

Once you fill out this form, we will coordinate with you as to the best way to provide your materials to our office.

YOUR NAME: Kelly Weimer Phone No. 805-455-1258

ADDRESS OF DAMAGED PROPERTY: 319 Hot Springs Rd, Santa Barbara

**I. REAL PROPERTY DAMAGE**

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| **Type of Document** | **State whether you have such documents, describe the documents you have, and if you do not have any please state: "do not have," and state why not (e.g. destroyed, lost)?** |
| Documents that describe your interest in the property: deed, lease, title insurance, sales records, etc. | See “For Ian - 319 Hot Springs Road.pdf” directed to our Hot Springs ReConstruction person - Ian Cronshaw |
| Documents, photographs, floor plans, architect drawings etc. showing layouts, floor plans, and the overall condition of the property *before* the fire | See “For Ian - 319 Hot Springs Road.pdf” |
| Documents that describe repairs, renovations to your property *before* the fire (2012 to December 2017) | See “For Ian - 319 Hot Springs Road.pdf” |
| Documents or photographs that show the vegetation, landscaping at your property *before* the fires | See “For Ian - 319 Hot Springs Road.pdf”  Also  See “READMEforPPropertyWorksheet - Claim #752621B21.pdf” directed to our State Farm insurance adjuster |
| Report related to inspections of your property *before* and *after* the fire (e.g. building department, permitting inspections, agricultural inspections) | See “For Ian - 319 Hot Springs Road.pdf”  Also  See “READMEforPPropertyWorksheet - Claim #752621B21.pdf” |
| Appraisal reports *before* and *after* the fire | See “For Ian - 319 Hot Springs Road.pdf” |
| Documents, photographs, videos or other materials that describe/show the damage to your property | See “For Ian - 319 Hot Springs Road.pdf”  Also  See “READMEforPPropertyWorksheet - Claim #752621B21.pdf” |
| Documents related to rebuilding, repairing or replacing your property after the fire (e.g., contract to rebuild; fence replacement; materials to rebuild; photos of the rebuild; invoices for money spent) | See “For Ian - 319 Hot Springs Road.pdf”  Ian to provide |
| Any other documents that support your property damage claims | See “For Ian - 319 Hot Springs Road.pdf”  Also  See “READMEforPPropertyWorksheet - Claim #752621B21.pdf” |

**II. PERSONAL PROPERTY DAMAGE**

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| **Type of Document** | **State whether you have such documents, describe the documents you have, and if you do not have any, why not (e.g. destroyed, lost)?** |
| Inventories or lists of the personal property items lost in the fire (this can include what you already submitted to insurance) | See “READMEforPPropertyWorksheet - Claim #752621B21.pdf” - Contains draft of inventory loss, not yet submitted to SF yet. |
| Receipts, invoices for original purchase of lost items | See “READMEforPPropertyWorksheet - Claim #752621B21.pdf” - Contains working draft of inventory losses, including links to verification (e.g. receipts.) |
| Documents, photos, videos that depict the condition of the personal property before the fire | See “READMEforPPropertyWorksheet - Claim #752621B21.pdf” - Contains working draft of inventory losses, including links to verification (e.g. receipts.)  Also see <https://www.dropbox.com/sh/6e18mp4ovat5txg/AACIGTjC_iZGG6IAAoySjhtna?dl=0>  And  <https://www.dropbox.com/sh/e6ybaq5qcxfhjto/AADf4zzAEK6Al48ERrVMXcyva?dl=0> |
| Documents that reflect the value of the items lost | See “READMEforPPropertyWorksheet - Claim #752621B21.pdf” - Contains working draft of inventory losses, including links to verification (e.g. receipts.) |
| Documents that depict/describe the damage caused to the items in the fire | See “READMEforPPropertyWorksheet - Claim #752621B21.pdf” - Contains working draft of inventory losses, including links to verification (e.g. receipts.) |
| Invoices, receipts, bills that relate to replacement or repair of your personal property items | See “READMEforPPropertyWorksheet - Claim #752621B21.pdf” - Contains working draft of inventory losses, including links to verification (e.g. receipts.) |

**III. PERSONAL INCOME LOSS**

**If you are not claiming "personal income loss" due to the fire, check here: \_\_\_\_\_\_\_ and continue on to the next section.**

|  |  |
| --- | --- |
| **Type of Document** | **State whether you have such documents, describe the documents you have, and if you do not have any, why not (e.g. destroyed, lost)?** |
| Resume, CV or any other that reflect educational, professional and/or work history. | See <https://www.linkedin.com/in/kellyagent/>  Also see kellyagent.com |
| Pay stubs that reflect yearly income from January 2012 to present |  |
| All documents showing sources of income (e.g. W2) | See 1099s:  <https://www.dropbox.com/s/60snlcnkzyfe07o/RFP%20Client%20Worksheet%28draft%29.docx?dl=0> |
| All documents reflecting total hours or salary lost due to the fire | “ |
| Any other documents which support your claim of personal income losses as a result of the fire |  |

**IV. BUSINESS INCOME LOSS**

**If you are not claiming "business income loss" due to the fire, check here: \_\_\_\_\_\_\_ and continue on to the next section.**

|  |  |
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| **Type of Document** | **State whether you have such documents, describe the documents you have, and if you do not have any, why not (e.g. destroyed, lost)?** |
| Articles of Incorporation, California Secretary of State filings, partnership agreements, fictitious business statements or other documents related to the business entity |  |
| Licenses, permits or other documents issued by any governmental entity to business entity |  |
| Financial statements between Jan. 2012 to present |  |
| Profit and loss statements between Jan. 2012 to present |  |
| Advertisements, website pages, brochures, promotional materials for the business between Jan. 2012 to present |  |
| Proposals, prospectuses, purchase agreements, sale agreements prepared between 1, 2012 - present in connection with any effort to sell any interest in the business(es) |  |
| Documents which contain or pertain to financial audits between January 1, 2012 and the present |  |
| Documents which reflect total business income, if any, lost by you business(es) as a result of the fire, incl. any evaluation of business income loss |  |
| Documents that reflect the value of any lost use, benefit, or goodwill in your business due to the fire |  |
| Documents that reflect the reduction in future insurance benefits due to lower crop yields because of the fire. |  |
| Any other docs which support business income loss claim as a result to the fires |  |

**V. EVACUATION DAMAGES**

**If you are not claiming "evacuation damages" due to the fire, check here: \_\_\_\_\_\_\_ and continue on to the next section.**

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| --- | --- |
| **Type of Document** | **State whether you have such documents, describe the documents you have, and if you do not have any, why not (e.g. destroyed, lost)?** |
| All documents, including but not limited to any recording of communications, you received informing you of the need to evacuate. | Alice’s email shows a few notices. We’re not sure if she got phone alerts. See uploaded: EvacNoticeJan7\_2018.pdf  Jan3\_MontecitoMtgAnnounced.pdf  AlertJan08\_2am.pdf  AfterFireEvacDec23\_2017.pdf |
| All documents related to any costs you incurred as a result of the evacuation |  |
| Any other documents which support claims made for evacuation |  |

**VI. PERSONAL OR EMOTIONAL INJURY CLAIMS**

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| **Type of Document** | **State whether you have such documents, describe the documents you have, and if you do not have any, why not (e.g. destroyed, lost)?** |
| Medical records for any injury, or exacerbation of existing injury |  |
| Medication documents, prescribed or not, taken as a result of the fires |  |
| Documents related to any previous physical injury to the same part of the body claimed. (up to 5 years prior to fire) |  |
| Documents reflecting any Medicare benefits you received for any injury that you attribute to the fire |  |
| For mental or emotional injuries claims where healthcare was sought, produce all documents for the five years prior to the fire (this means, records related to prior mental health treatment) |  |
| Any other documents which support or relate to your claim of personal injury |  |

**VII. GENERAL REQUESTS**

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| **Type of Document** | **State whether you have such documents, describe the documents you have, and if you do not have any, why not (e.g. destroyed, lost)?** |
| All documents that reflect funds received from FEMA, County of Santa Barbara, County of Ventura, or the State of California for damages caused by fire | FEMA Flood Insurance, 250K see <https://www.dropbox.com/sh/uprgncvbqs0mpkp/AAD2w21148xCWAqNDVxzUF3ca?dl=0> |
| Tax assessment value/bills for the property from 2012 to present | See <https://www.dropbox.com/s/fc57as6u2bqa318/Santa%20Barbara%20Property%20Tax%20Website.pdf?dl=0> |
| Insurance claims documents, emails, correspondence | See “READMEforPPropertyWorksheet - Claim #752621B21.pdf”  And working directory of State Farm correspondence (more emails to fins and add):  https://www.dropbox.com/sh/b7zjkx2zbki4msy/AADo4x9ULyG0Po6UtzxfS8Uma?dl=0 |
| Documents used for preparation of the questionnaire (if not identified above) |  |