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Zaremba Brownell & Brown PLLC

www.zbblaw.com

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Frank R. Malpigli, Esq.
Direct Line: 646.626.5786
E-Mail: fmalpigli@zbbfirm.com

October 31, 2014

WHITE FLEISCHNER & FINO LLP
 303 Old Tarrytown Road
 White Plains, NY 10603
 File No. 456-17504

Re: *Allied World vs. Burtis*
Index No.: 650826/14 (New York County)
Claim No.: CVSI-0892A1
Date of Loss: August 21, 2012
Our File No.: D14-04-09

Dear Counselors:

Please see the attached Subpoena Duces Tecum that has been served on Proactive Brokerage, Inc. regarding this matter.

Thank you for your consideration. As always, please feel free to contact me with any questions or concerns.

Very truly yours,

ZAREMBA BROWNELL & BROWN PLLC

By:

Frank R. Malpigli, Esq.

FRM/tm

Cc: The Law Office of Kevin G. McMorrow
Counsel for Deborah Bradley
45 Hill Park Avenue
Great Neck, New York 11021

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Zaremba Brownell & Brown PLLC

Vessa & Wilensky, PC
Counsel for LaRosas
626 RexCorp Plaza, 6th Floor
Uniondale, New York 11556

Zachary W. Carter
Corporation Counsel
100 Church Street
New York, NY 10007

NEW YORK CITY POLICE DEPARTMENT
One Police Plaza
Attn: Legal Department
New York, NY 10038
NEW YORK CITY DEPARTMENT OF
TRANSPORTATION
55 Water Street, 9th Floor
New York, NY 10041

NEW YORK CITY DEPARTMENT OF
ENVIRONMENTAL PROTECTION
59-17 Junction Boulevard
Flushing, NY 11373

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

ALLIED WORLD ASSURANCE COMPANY,

Plaintiff

Index No.: 650826/2014

-against-

DEBORAH BRADLEY CONSTRUCTION &
MANAGEMENT SERVICES, INC., RICHARD
LAROSA, CLAIRE LAROSA, CITY OF NEW YORK,
NEW YORK CITY POLICE DEPARTMENT,
NEW YORK CITY DEPARTMENT OF
TRANSPORTATION, NEW YORK CITY DEPARTMENT
OF ENVIRONMENTAL PROTECTION,
AND BURTIS CONSTRUCTION CO. INC.

SUBPOENA DUCES TECUM

Defendants.
_____X

To: Proactive Brokerage Inc.
960a Sunrise Highway
West Babylon, New York 11704

WE COMMAND YOU, that all business and excuse being laid aside, you produce at the office of Zaremba Brownell and Brown PLLC, 40 Wall Street, 27th Floor, New York, New York 10005, a complete copy of the Commercial General Liability Insurance Policy, including certificates of insurance, notes, memoranda, insurance application, payment stubs, cancellation notices that was issued on-behalf of **Deborah Bradley Construction and Management Services, Inc.** that was effective on August 21, 2012. The documents provided shall include all **Excess/Umbrella Policies** connected with the aforementioned insurance policy.

Failure to comply with this subpoena is punishable as a contempt of Court and shall make you liable to the person on whose behalf this subpoena was issued for a penalty not to exceed fifty dollars and all damages sustained by reason of your failure to comply.

Should you have any questions, please contact Frank R. Malpigli, Esq. at (646) 626-5786.

Dated: October 28, 2014
New York, New York

Zaremba Brownell & Brown, PLLC


Frank R. Malpigli, Esq.
Attorneys for Defendant/Counterclaimant,
BURTIS CONSTRUCTION CO. INC.
40 Wall Street, 27th Floor
New York, NY 10005

TO: WHITE FLEISCHNER & FINO LLP
Attorneys for Plaintiff
ALLIED WORLD ASSURANCE COMPANY
303 Old Tarrytown Road
White Plains, NY 10603
File No. 456-17504

The Law Office of Kevin G. McMorrow
Counsel for Deborah Bradley
45 Hill Park Avenue
Great Neck, New York 11021

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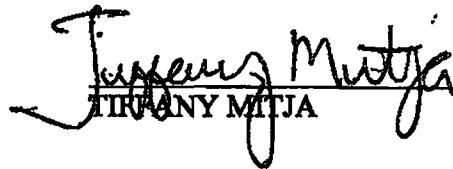
**NEW YORK CITY DEPARTMENT OF
ENVIRONMENTAL PROTECTION
59-17 Junction Boulevard
Flushing, NY 11373**

AFFIDAVIT OF SERVICE

STATE OF NEW YORK)
)
 COUNTY OF NEW YORK) ss.:

TIFFANY MITJA, deposes and says that I am not a party to this action, that I am over eighteen years of age, that I reside in Richmond County, New York, and that I am employed by Zaremba, Brownell & Brown PLLC, 40 Wall Street, 27th Floor, New York, New York 10005, attorneys for defendant BURTIS CONSTRUCTION COMPANY INC. On the 30th day of October, 2014, I served the within **SUBPOENA DUCES TECUM** via regular mail:

SEE RIDER


 TIFFANY MITJA

Sworn to before me this
 30th day of October, 2014

Christopher J. Camera
 NOTARY PUBLIC

CHRISTOPHER J. CAMERA
 Notary Public, State of New York
 No. 020825547
 Qualified in Richmond County
 Commission Expires July 23, 20...

RIDER

WHITE FLEISCHNER & FINO LLP
Attorneys for Plaintiff
ALLIED WORLD ASSURANCE COMPANY
303 Old Tarrytown Road
White Plains, NY 10603
File No. 456-17504

The Law Office of Kevin G. McMorrow
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Index No. 650826/2014

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK**

ALLIED WORLD ASSURANCE COMPANY,

Plaintiff

-against-

**DEBORAH BRADLEY CONSTRUCTION &
MANAGEMENT SERVICES INC., RICHARD
LAROSA, CLAIRE LAROSA, CITY OF NEW YORK,
NEW YORK CITY POLICE DEPARTMENT,
NEW YORK CITY DEPARTMENT OF
TRANSPORTATION, NEW YORK CITY DEPARTMENT
OF ENVIRONMENTAL PROTECTION,
AND BURTIS CONSTRUCTION CO. INC.**

Defendants.

SUBPOENA DUCES TECUM

ZAREMBA BROWNELL & BROWN PLLC

Attorneys for Defendant

BURTIS CONSTRUCTION CO. INC.

Office and Post-Office Address, Telephone

40 Wall Street, 27th Floor

New York, New York 10005

Tel: (212) 380-6700

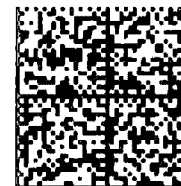
Fax: (212) 871-6395



Zaremba Brownell & Brown PLLC

40 Wall Street, 27th Floor · New York, NY 10005

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Legal

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