

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO**

Civil Action No. 1:21-cv-\_\_\_\_\_

BERKSHIRE LIFE INSURANCE COMPANY OF AMERICA,

Plaintiff,

v.

ANNA SCHUBERT,

Defendant.

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**COMPLAINT TO CONFIRM RESCISSION OF INSURANCE POLICIES  
AND DECLARATORY RELIEF**

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Plaintiff Berkshire Life Insurance Company of America (“Berkshire”), through its attorneys, Franz Hardy and Christine M. Kroupa of Gordon Rees Scully Mansukhani, LLP, states as follows for its Complaint to Confirm Rescission of Insurance Policies and Declaratory Judgment against Defendant Anna Schubert:

**PARTIES**

1. At all relevant times, Berkshire was and is a corporation organized and existing under the laws of the Commonwealth of Massachusetts, with its principal place of business located at 700 South Street, Pittsfield, Massachusetts 01201, and is authorized to transact the business of insurance in the State of Colorado. It is also authorized to transact the business of insurance in the State of North Carolina where the events at issue occurred.

2. Berkshire is informed and believes that Defendant Anna Schubert is an individual who is currently a citizen and resident domiciled in the City and County of Denver, Colorado.