

772140003556020110



INFINITY COUNTY MUTUAL INSURANCE COMPANY  
SUBROGATION

P.O. BOX 830807

BIRMINGHAM, AL 35283-0807

Email: mail.claims@ipacc.com

Tel: 800-334-1661

Fax: 800-214-5727

DATE: 06/23/17

POLICY: 142550235959001

CLAIM NUMBER: 20002965701

DATE OF LOSS: 05/09/17

INSURED NAME:

BARAJAS, ABIGAIL

CLAIMANT NAME:

BARAJAS, ABIGAIL

J HERNANDEZ, JR, TRANSPORT LLC  
6943 OLEANDER GROVE WAY

HOUSTON TX 77049-1574

Our records show you are responsible for damages in the amount of \$ 8538 .88 for the loss that occurred on 05/09/17.

If you were insured for liability coverage on the above mentioned date of loss, please have your insurance company contact us without delay, or you may complete the bottom portion of this letter and return it to our address above. If you were not insured for this loss, please contact us immediately to make arrangements for payment.

\*\*\* THIS IS THE ONLY NOTIFICATION YOU WILL  
RECEIVE FROM US REGARDING THIS LOSS \*\*\*

If you do not respond, our next action will be referral to a collection agency or an attorney for further action. If you have any questions, I can be reached at 800-334-1661 EXT 83685

Sincerely,

SHANNON CHAMBERS

Subrogation Specialist

\*\*\*\*\*

Insured Name \_\_\_\_\_ Claim Number \_\_\_\_\_

I was insured for this loss with:

Insurance Company Name: \_\_\_\_\_ Claim Reported? Y

Address: \_\_\_\_\_

Clam No: \_\_\_\_\_ Policy No: \_\_\_\_\_

Adjuster Name \_\_\_\_\_ Phone No: \_\_\_\_\_

\* The purpose of this letter is to resolve and validate a claim. If you dispute this claim or any portion thereof, you must not this writer in writing within 30 days, or we will assume this claim to be valid and proceed accordingly.

NF49A N0001 20002965701 000 COLL SKU 20170623 CLA

Adler  
m S. Adler  
or K. Akins  
w P. Bias  
t Boone  
tantu  
ael Gomez  
topher Harkey  
am R. Liles  
Roberto Marroquin  
ett W. Mize  
el Moran  
ra L. Paiz

so Licensed in Colorado

**JIM ADLER**  
& ASSOCIATES  
TEXAS INJURY LAWYERS



1900 West Loop South, 20<sup>th</sup> Floor  
Houston, Texas 77027-3214  
Direct: 713-341-1329  
Facsimile: 713-953-9550  
Ybonilla@jimadler.com

June 14, 2017

Jason A. Powe  
Rolando Quesada  
Ky Rathkar  
Frank W. Roberts  
Karishma Patel Sandes  
Kyle D. Schmitt  
Paul J. Sembrano  
Langdon S. S.  
Alexander S. S.  
Scott C. Villan  
Jackson W.  
♦ P. Andrew W.

**CERTIFIED MAIL NO.: 9214-8969-0069-0200-1734-88**

Dona Johns  
Qualitas Insurance  
101 West Broadway # 1270  
San Diego, CA 92101

RE: **PRESERVATION OF EVIDENCE**  
1996 White Freightliner Texas Plate: 1L3-9653  
Claim No.: 3386  
Our Case No.: 509520

Dear Ms. Johns:

My law firm and I represent Abigail Barajas for damages resulting from an incident that occurred on 05/09/2017. The vehicle involved in the incident is described below.

**WE FORMALLY REQUEST IMMEDIATE PRESERVATION OF THE FOLLOWING:**

1. 1996 White Freightliner Texas Plate: 1L3-9653
2. All tire/tread portions, seat belts, doors, roof, seats, and all other components relative to the above-described vehicle;
3. All driver qualification file(s);
4. Driver investigation history file(s);
5. Records of duty status;
6. Driver's daily log within the past six months.; and/or
7. Driver's drug screens, both random and post-collision.

Additionally, we request that you or your client preserve and retain any and all mechanically and/or electronically produced records from any on-board recording device in the vehicle driven by Josue Hernandez Jr on the date of the collision in question and for the six months preceding the collision. This request includes but is not limited to the following:

1. Tachograph;
2. Hubometer;
3. Tripmaster™;

DTC P114 - 509520