

# COMPREHENSIVE CLAIM SUMMARY

## MASTER CLAIM DOCUMENTATION AND STATUS REPORT

**Prepared for:** David and Susan Mitchell  
**Date Prepared:** November 8, 2024  
**Claim #:** WD-2024-67321  
**Policy #:** HO3-8974521  
**Adjuster:** Thomas Anderson - License #: TX-981247  
**Carrier:** Allstate Insurance Company

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### EXECUTIVE SUMMARY

This comprehensive summary documents the complete history and current status of the insurance claim arising from the water damage loss on August 15, 2024 at 7823 Maple Grove Lane, Dallas, TX 75248. This document serves as the official record of the policyholder's position regarding all aspects of the claim and identifies all outstanding issues requiring resolution.

#### Key Metrics

- **Days Since Loss:** 85
  - **Days Claim Open:** 83
  - **Initial Estimate:** \$45,000
  - **Current Claimed Amount:** \$127,450
  - **Amount Paid:** \$31,250
  - **Amount Outstanding:** \$96,200
  - **Amount Disputed:** \$78,900
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### I. LOSS OVERVIEW

#### Incident Details

- **Date of Loss:** August 15, 2024
- **Time of Discovery:** 3:45 AM
- **Reported to Carrier:** August 15, 2024 at 7:30 AM
- **Method of Report:** ☒ Phone

- **Claim Number Assigned:** WD-2024-67321 on August 15, 2024
- **First Contact from Adjuster:** August 16, 2024 (1 day after report)
- **First Inspection:** August 19, 2024 (4 days after loss)

Cause of Loss

**Primary Cause:** Burst pipe in master bathroom wall - hot water supply line failure

Contributing Factors:

- Age of plumbing (original 1998 copper pipes)
- High water pressure (85 PSI measured)
- No pressure regulator installed

Current Claim Status

☒ **Open - Disputed**

Multiple supplements pending, considering appraisal process

II. POLICY COVERAGE ANALYSIS

Policy Information

- **Policy Period:** March 1, 2024 to March 1, 2025
- **Premium:** \$2,847 annually (paid in full)
- **Previous Renewals:** 12 years with carrier
- **Policy Type:** ☒ HO-3 (Special Form)

Coverage Limits and Application

Coverage Type	Policy Limit	Claimed	Paid	Outstanding	Notes
Dwelling (A)	\$450,000	\$89,750	\$24,000	\$65,750	Dispute on scope
Personal Property (C)	\$225,000	\$28,700	\$7,250	\$21,450	Inventory pending
Loss of Use (D)	\$90,000	\$9,000	\$0	\$9,000	Not yet addressed

Additional Coverages Applied

Coverage	Available	Claimed	Paid	Status
Code Upgrades	\$45,000	\$18,500	\$0	Denied - Appealing
Emergency Repairs	\$5,000	\$4,200	\$4,200	Paid

Coverage	Available	Claimed	Paid	Status
Mold Remediation	\$10,000	\$10,000	\$0	Under Review

Deductibles

- **Standard Deductible:** \$2,500 (applied)
- **Total Deductible Applied:** \$2,500

Policy Exclusions/Limitations Cited by Carrier

1. **"Continuous seepage"** - Our Response: Sudden burst, not seepage
2. **"Lack of maintenance"** - Our Response: Regular maintenance documented
3. **"Mold coverage limited"** - Our Response: Direct result of covered loss

III. DAMAGE ASSESSMENT COMPARISON

Structural Damages

Component	Our Assessment	Carrier Assessment	Difference	Status
Flooring	\$24,500	\$8,000	\$16,500	Disputed
Drywall	\$18,750	\$7,500	\$11,250	Disputed
Kitchen Cabinets	\$22,000	\$0	\$22,000	Disputed
Bathroom Vanities	\$8,500	\$3,500	\$5,000	Disputed
Insulation	\$7,000	\$2,000	\$5,000	Disputed
Painting	\$9,000	\$3,000	\$6,000	Disputed
Total Structure:	\$89,750	\$24,000	\$65,750	

Personal Property Losses

Category	Items	RCV Claimed	ACV Paid	RCV Due	Disputed
Furniture	18	\$12,500	\$3,000	\$9,500	\$7,000
Electronics	8	\$6,800	\$1,500	\$5,300	\$3,800
Clothing	150+	\$4,500	\$800	\$3,700	\$2,900
Rugs/Decor	25	\$4,900	\$1,950	\$2,950	\$2,000
Totals:	201+	\$28,700	\$7,250	\$21,450	\$15,700

IV. INSPECTION & ADJUSTMENT TIMELINE

Date	Event	Person/Company	Outcome	Report
8/19/24	Initial adjuster inspection	T. Anderson/Allstate	\$45K estimate	Received
8/22/24	Our contractor inspection	Premium Restoration	\$118K estimate	Submitted
8/28/24	Plumbing inspection	Expert Plumbing	Confirmed burst pipe	Submitted
9/5/24	Mold inspection	EnviroTest Labs	Elevated spores found	Submitted
9/12/24	Carrier re-inspection	T. Anderson/Allstate	Maintained position	No change
9/20/24	Public adjuster inspection	Claims Advocates LLC	\$125K estimate	Submitted

V. PAYMENT HISTORY & RECONCILIATION

Payments Received

Date	Check #	Amount	Type	Coverage Applied	Status
8/25/24	78934	\$4,200	Emergency	Mitigation	Cleared
9/8/24	81247	\$21,500	ACV-Structure	Dwelling	Cleared
9/15/24	82901	\$5,550	ACV-Contents	Personal Property	Cleared
Total Received:		\$31,250			

Payment Reconciliation

Category	Should Have Received	Actually Received	Shortfall
Initial Structure ACV	\$62,825	\$21,500	\$41,325
Initial Contents ACV	\$20,090	\$5,550	\$14,540
Emergency/Mitigation	\$4,200	\$4,200	\$0
ALE	\$6,300	\$0	\$6,300
Total:	\$93,415	\$31,250	\$62,165

VI. DISPUTED ITEMS DETAIL

Major Dispute #1: Kitchen Cabinet Replacement

- Item/Issue: Water damaged lower cabinets
- Our Position: Complete replacement needed for matching - \$22,000

- **Carrier Position:** Repair and refinish only - \$0
- **Difference:** \$22,000
- **Supporting Evidence:**
  - Moisture readings showing saturation
  - Manufacturer letter stating can't match 1998 cabinets
  - Three contractor opinions
- **Status:** ☒ Escalated

## Major Dispute #2: Continuous Coverage Areas

- **Item/Issue:** Flooring throughout first floor
- **Our Position:** Must replace continuous flooring for matching - \$16,500
- **Carrier Position:** Replace only damaged rooms - \$8,000
- **Difference:** \$8,500
- **Supporting Evidence:**
  - Photos showing continuous installation
  - Flooring expert report
  - Industry standard practice
- **Status:** ☒ Open

## Major Dispute #3: Mold Remediation

- **Item/Issue:** Professional mold remediation required
  - **Our Position:** Full protocol per IICRC S520 - \$10,000
  - **Carrier Position:** Simple cleaning sufficient - \$0
  - **Difference:** \$10,000
  - **Supporting Evidence:**
    - Environmental test results
    - Health department guidelines
    - Medical documentation (allergies)
  - **Status:** ☒ Open
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## VII. CORRESPONDENCE SUMMARY

### Key Correspondence Milestones

Date	Type	Direction	Subject	Response Status
8/15/24	FNOL	Us to Carrier	Initial claim	Acknowledged 8/15
8/28/24	Proof of Loss	Us to Carrier	Sworn proof \$125,000	No response
9/10/24	Partial Denial	Carrier to Us	Coverage limitations	Appealed 9/15
9/25/24	Supplement	Us to Carrier	Hidden damage \$15,000	Denied 10/2
10/15/24	Demand Letter	Attorney to Carrier	Bad faith notice	Response pending

### Outstanding Requests

Date Requested	Request	From	To	Response Due	Status
10/8/24	Full policy copy	Us	Carrier	10/23/24	Overdue
10/12/24	Claim notes	Attorney	Carrier	10/27/24	Pending
10/20/24	Supervisor review	Us	Carrier	11/4/24	Pending

## VIII. EXPERT INVOLVEMENT

Expert Type	Name	Company	Date Engaged	Report Date	Key Finding	Cost
Public Adjuster	James Wilson	Claims Advocates	9/18/24	9/20/24	\$125K total loss	10%
Plumber	Mike Roberts	Expert Plumbing	8/28/24	8/28/24	Burst pipe confirmed	\$350
Mold Assessor	Dr. Amy Chen	EnviroTest	9/5/24	9/7/24	Stachybotrys present	\$650
Engineer	Paul Davis, PE	Structural Associates	10/1/24	10/5/24	No foundation damage	\$1,200

## IX. BAD FAITH INDICATORS TRACKING

### Documented Issues

☒ Unreasonable Delays

- 8/28/24: No response to proof of loss for 21 days
- 9/25/24: Supplement ignored for 7 days
- 10/8/24: Policy copy request ignored (15 days and counting)

#### ✓ **Failure to Investigate**

- Never inspected attic for related damage
- Refused to test for mold despite visible growth
- Didn't review maintenance records provided

#### ✓ **Lowball Offers**

- 9/8/24: Offered \$21,500 vs. documented \$89,750 structure damage
- 9/15/24: Contents offer 25% of documented value

#### ✓ **Lack of Communication**

- 9/10-9/24: No response to multiple calls/emails
- 10/1-10/15: Adjuster unavailable, no backup assigned

### **Statute of Limitations**

- **File Suit By:** August 15, 2026
  - **Days Remaining:** 645
  - **Notice Requirements:** ✓ Met (60-day notice sent 10/15/24)
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## **X. CURRENT STATUS & NEXT STEPS**

### **Current Status Summary**

The claim remains significantly underpaid with \$96,200 in documented damages outstanding. The carrier has failed to respond adequately to supplements and appears to be acting in bad faith. We have engaged a public adjuster and attorney. The 60-day bad faith notice was sent on October 15, 2024. If no satisfactory response by December 15, 2024, we will proceed with appraisal and/or litigation.

### **Outstanding Issues Priority List**

1. **Kitchen cabinet coverage** - Priority: High
  - Action Required: Demand coverage or explanation
  - Responsible Party: Carrier

- **Deadline:** November 15, 2024

2. **Mold remediation approval** - Priority: High

- **Action Required:** Approve remediation protocol
- **Responsible Party:** Carrier
- **Deadline:** November 10, 2024

3. **ALE payment** - Priority: High

- **Action Required:** Process 3 months submitted ALE
- **Responsible Party:** Carrier
- **Deadline:** November 12, 2024

## Upcoming Deadlines

Date	Deadline Type	Description	Status
11/10/24	Response	Carrier response to supplement	Pending
11/15/24	Decision	Appraisal demand decision	Pending
12/15/24	Bad Faith	60-day notice expires	Waiting
1/15/25	Legal	File suit or invoke appraisal	TBD

## XI. SETTLEMENT POSITION

### Our Position

- **Total RCV of Loss:** \$127,450
- **Less Deductible:** \$2,500
- **Net Claim Value:** \$124,950
- **Amount Paid:** \$31,250
- **Balance Due:** \$93,700

### Minimum Acceptable Settlement

- **Amount:** \$105,000
- **Conditions:**
  - Full mold remediation included
  - No release of bad faith claims
  - Payment within 30 days



Areas of Potential Compromise

- 1. **Flooring** - Range: \$18,000 to \$24,500 (may accept \$20,000)
- 2. **Painting** - Range: \$7,000 to \$9,000 (may accept \$7,500)
- 3. **Contents depreciation** - Range: \$20,000 to \$28,700 (may accept \$24,000)

XII. FINANCIAL IMPACT SUMMARY

Out-of-Pocket Expenses

Category	Amount	Reimbursable	Reimbursed	Outstanding
Emergency repairs	\$4,200	Yes	\$4,200	\$0
Temporary housing	\$6,300	Yes	\$0	\$6,300
Storage unit	\$900	Yes	\$0	\$900
Expert fees	\$2,200	TBD	\$0	\$2,200
Total:	\$13,600		\$4,200	\$9,400

Economic Impact

- **Lost work time:** 12 days = \$4,800
- **Credit card interest:** \$450 (financing repairs)
- **Total economic loss:** \$5,250

CERTIFICATION

I certify that this comprehensive claim summary accurately represents the status and history of this insurance claim based on all available documentation and correspondence.

**Prepared by:** David Mitchell  
**Title/Relationship:** Policyholder  
**Date:** November 8, 2024  
**Contact:** (214) 555-0892 / [dmitchell2024@email.com](mailto:dmitchell2024@email.com)

**Reviewed by:** Sarah Johnson, Public Adjuster  
**Date:** November 8, 2024  
**License #:** TX-PA-4521

# CLAIM TIMELINE VISUALIZATION



## CONFIDENTIAL - PREPARED FOR POTENTIAL LITIGATION

This document contains confidential information prepared in anticipation of potential litigation and should be treated as attorney-client privileged material.