

Baron, Matthew

From: Georganne Jussel <gdjussel@comcast.net>
Sent: Wednesday, June 10, 2015 9:31 AM
To: Baron, Matthew
Cc: 'ML Doner'; 'Robyn Walcoff'; 'Barbara Murphy'
Subject: MEL Acknowledgment - Markeye Boyd v Plainfield, #1940003457, MEL #Z19288, DOL 6/6/12
Attachments: IR110000.pdf

Dear Mr. Baron,

In follow up to Sim's email of 6/8/15, the file has been assigned to me for handling. Thank you for your initial report, a copy of which is attached for the benefit of Mary Lou, Robyn and Barbara.

As discussed on 6/8/15, it is very odd that Judge Chesler did not touch on the statute issue in his Memorandum and Order. The complaint was filed almost one full year beyond the statute of limitations. The complaint form Boyd filled out is dated November 19, 2014, which is still beyond the statute.

I looked into the Prison Litigation Reform Act but did not see anything addressing exceptions to the statute of limitations. I do not believe the fact that the plaintiff is currently pro se should be an excuse for blowing the statute yet being allowed to proceed.

Unless I'm missing something, I see no reason why defense counsel shouldn't make an immediate motion to dismiss the entire matter based on the late filing.

While the loss has been reported to us based on the filing of the lawsuit, it is not the reason the MEL file will remain open. Instead, the file will remain open due to the allegation of a ruptured colon.

I will continue to monitor the file in order to see if the lawsuit is allowed to proceed. As such, the MEL file has been placed on diary for 9/15/15 in anticipation of receiving the next update. I will also look forward to receiving defense counsel's analysis regarding this unusual case.

Regards,

Georganne

Georganne D. Jussel
Claims Administrator
CB Claims, LLC
50 South Franklin Turnpike
Ramsey, NJ 07446
Direct Dial: 908.245.4900
Office Phone: 201.818.6400
Office Fax: 201.818.4090

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-----Original Message-----

From: Baron, Matthew [mailto:MBaron@pnat.com]
Sent: Friday, June 05, 2015 1:02 PM
To: Christopher C Botta Esq (CCB@bottalaw.com)
Subject: 1940003457 BOYD MARKEYE new loss report

RE: Inservco Claim #: 1940003457

Mr Botta

Attached is a new report of claim that was sent to your office this morning.

I received a notice that it was not properly delivered via email, so I am attaching it again for your review. I have not received any such message pertaining to any of the other recipients, so I have not resent this to any of them.

My initial email, report, summons and complaint, and judge's decision in this matter are attached for your review.

Thank you for your attention to this matter.

Matt Baron, CPCU, AIC
Inservco Insurance Services
Crossroads Corporate Center
3150 Brunswick Pike, Suite 200
Lawrenceville, NJ 08648
Phone: (800) 334-1348, ext 5534
Fax: (609) 434-1251

*** Please include our claim number on all correspondence.

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3150 Brunswick Pike, Suite 200
Lawrenceville, NJ 08648
Phone: (800) 334-1348, ext 5534
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Baron, Matthew

From: Sim Van Houwe <svh@bottalaw.com>
Sent: Monday, June 08, 2015 1:36 PM
To: Baron, Matthew
Subject: ACKNOWLEDGEMENT - Boyd v. City of Plainfield (Inservco #1940003457, MEL #Z19288)

Dear Mr. Baron,

This will serve as preliminary acknowledgement of receipt of your first report on the above matter. A MEL file has been set up under the above claim number and a formal acknowledgement will be forwarded in the near future by either Chris Botta or Georganne Jussel.

Should you have any questions in the interim, please feel free to contact me.

Very truly yours,

Sim Van Houwe

Sim Van Houwe, Administrative Assistant to:
Christopher C. Botta, Esq.
CB Claims, LLC
50 South Franklin Turnpike
Ramsey, NJ 07446
Phone: 201-818-6400, ext. 18 (9AM to 3PM)
Fax: 201-818-4090
E-mail: svh@bottalaw.com

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Baron, Matthew

From: Christopher C. Botta <ccb@bottalaw.com>
Sent: Friday, June 05, 2015 1:11 PM
To: Baron, Matthew
Subject: RE: 1940003457 BOYD MARKEYE new loss report

Received, thank you.
Chris

Christopher C. Botta
CB Claims, LLC
50 South Franklin Turnpike
Ramsey, NJ 07446

Tel: 201-818-6400, ext. 12
Fax: 201-818-4090
Mobile: 201-218-7794
CCB@bottalaw.com

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