

----- Forwarded message -----

From: **Larry Watts** <[watts.larry@gmail.com](mailto:watts.larry@gmail.com)>

Date: Thu, May 9, 2024 at 8:41 AM

Subject: Re: [EXTERNAL] Re: Our Insured: Casey Slone //Claim No. W2C22131

To: Bradix, Shari <[Shari.Bradix@cna.com](mailto:Shari.Bradix@cna.com)>

Dear Shari Bradix,

Thank you for your reply.

I have deadlines that will be difficult for me to meet this week, therefore, I am only able to respond to your email in part at this time. I will respond to your email in whole as soon as possible.

- 1) I strongly share your concerns regarding the time that passed before I was able to report the claim to Continental Casualty Company ("CNA"). I will be addressing this issue in detail in a subsequent email.
- 2) All damages were promptly reported to the City of Marshall and to Casey Sloan Construction, LLC's onsite foreman/supervisor. I will furnish precise details regarding the circumstances and dates in my forthcoming communication.
- 3) The issue has been resolved, barring the expenses we incurred during the resolution process. These expenses encompass the procurement of broken line and cleanout materials for the repairs, interior cleanup, scoping of the sewer line, and two separate plumber evaluations before Sloan or the city would finally take action.
- 4) Yes, I have supporting documentation that I will provide.
- 5) While there have been complaints from other building owners regarding substantial amounts of water running under their buildings potentially affecting their foundations, to the best of my knowledge, ours was the only lower level/basement flooded. Chip Arledge's email pertained to our building.
- 6) I will address for your review.
- 7) Yes, the void behind the electrical box was finally addressed. I did have to replace the ground rod connector that grounds our Main 3 Phase Electrical Service. I will submit photos for your review.
- 8) I apologize if my prior email was unclear. What I meant to convey is, they poured around our building in a way that left no egress for rainwater to drain away from our building. We came up with a solution using sandbags, plywood from our building to the new sidewalk and covered with heavy plastic so the water would run away from our building and not get trapped between the new sidewalk and the unpoured area in front of the building. I will submit photos for your review and clarification. We do need to run a sump pump on the inside of the curb every time it rains to prevent the new sidewalk lower brick path from backing up into this area, I will submit photos for clarification. Our mitigation efforts have proven successful in keeping us dry until the damages to the front of our building can be repaired.
- 9) No, I have not submitted a claim to our insurance company for the damages caused by Casey Sloan Construction Company, LLC.
- 10) Cleanup, indoor portion of the HVAC system, (2) 18" insulated flexible return air ducts, some furnishings. I will compile a complete list and photos for your review.

Please provide the scope of the Engineer's inspection so I can research for an engineer specializing in the same area.

Thank you for your understanding and assistance.

Respectfully,

Larry Watts

On Wed, May 8, 2024 at 11:53AM Bradix,Shari <[Shari.Bradix@cna.com](mailto:Shari.Bradix@cna.com)> wrote:

Mr. Watts,

This claim was reported to Continental Casualty Company ("CNA") on 04/15/2024.

Pursuant to your email dated 04/23/2024 to Ataya Woodard, clarifies the dates of damages which are listed as follows:

Brick Damage: 02/01/2024 - 02/09/2024  
Water damage to lower level: 02/11/2024  
Sewer fill up: 04/07/2024

1. As both the damage to the brick and the water damage occurred in early February 2024, why did it take over two months for you to report the claim?
2. When did you first report the subject damages to the City of Marshall, Casey Slone and Bockmon Agency?
3. As I understand the City of Marshall has replaced the sewer line and added a clean out. As such, this issue has been resolved. If that is not the case, please so advise.
4. You reported that flooding occurred in the basement causing wall damage. Do you have supporting documentation?
  1. Photos
  2. Witnesses
  3. Invoices for the damage, inspection reports by contractors
5. Has there been other buildings flooded out? You provided email dated April 11, 2024 from Chip Arledge which states: "Power Out, Basements flooded and Signs Knocked Down..."

If so, please provide with their contact information.
6. The brick needs to be repaired.
  - a. Provide cost of repair
7. You reported that there is a void behind the electrical box. Has Casey Slone repaired this condition?
8. You state in letter to Ataya Woodward that "Unfortunately, the contractors recent work, has created a new hazard trapping water between the new sidewalk and against our building during the insurance investigation process."
  - a. Please provide engineering report(s) that evidences the trapped water between the new sidewalk and your building
9. Have you submitted a claim to your first party insurer? If so, what is the amount of the claim. Have you been paid by your first party insurer?

10. Are there any other damages you are claiming.

Next Steps:

CNA has retained an engineer to inspect your building. I will have the engineer contact you directly to schedule an inspection.

Shari L. Bradix, CRIS  
Managing Claims Consultant  
CNA Construction Defect Claims

P.O. Box 8317

Chicago, IL 60680-8317

Tel. (415) 932-7213

Fax:(866) 622-7517

Toll: (800) 262-7161

---

**From:** Larry Watts <[watts.larry@gmail.com](mailto:watts.larry@gmail.com)>  
**Sent:** Tuesday, May 7, 2024 8:12 PM  
**To:** Bradix,Shari <[Shari.Bradix@cna.com](mailto:Shari.Bradix@cna.com)>  
**Subject:** [EXTERNAL] Re: Our Insured: Casey Slone //Claim No. W2C22131

Dear Shari L. Bradix,

Thank you for your email advising that you are now handling this claim.

I acknowledge that there may have been some transitions regarding this claim. However, I have not yet received the emailed list of questions as previously mentioned by CNA.

Could you please provide an update on the current status of the claim, inform me when I can expect to receive the aforementioned questions, and outline the specific next steps going forward?

I look forward to working with you.

Respectfully,

Larry Watts

On Tue, May 7, 2024 at 7:44 PM Bradix, Shari <[Shari.Bradix@cna.com](mailto:Shari.Bradix@cna.com)> wrote:

Mr. Watts:

Please be advised that this claim has been transferred to me for further handling. Please contact me at your earliest

convenience to discuss the facts surrounding this claim.

Thank you

Shari L. Bradix, CRIS  
Managing Claims Consultant  
CNA Construction Defect Claims

P.O. Box 8317

Chicago, IL 60680-8317

Tel. (415) 932-7213

Fax: (866) 622-7517

Toll: (800) 262-7161

This e-mail message, including any attachments and appended messages, is for the sole use of the intended recipients and may contain confidential and legally privileged information.

If you are not the intended recipient, any review, dissemination, distribution, copying, storage or other use of all or any portion of this message is strictly prohibited.

If you received this message in error, please immediately notify the sender by reply e-mail and delete this message in its entirety.

This e-mail message, including any attachments and appended messages, is for the sole use of the intended recipients and may contain confidential and legally privileged information.

If you are not the intended recipient, any review, dissemination, distribution, copying, storage or other use of all or any portion of this message is strictly prohibited.

If you received this message in error, please immediately notify the sender by reply e-mail and delete this message in its entirety.