

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF FLORIDA, KEY WEST DIVISION

CASE NO. 08-10084-CIV-MARTINEZ/BROWN

PETER HALMOS, et al.,

Plaintiffs,

vs.

INSURANCE COMPANY OF NORTH
AMERICA, et al.,

Defendants.

PLAINTIFFS' FILING OF SUPPLEMENTAL EXHIBITS TO D.E. 1337

On April 26, 2011, Plaintiffs filed their Corrected Plaintiffs' Verified Motion For Other Relief addressing the harm that INA claimed resulted from Plaintiffs not producing a single letter, and this Court's subsequent sanctioning of Plaintiffs. Attached to Plaintiffs' Filing are further examples of instances in which INA specifically conducted discovery as to the issues in the 2005 Letter during depositions by asking questions as to (1) the Halon system (Exhibit 1, Tr. 13/2-13), (2) the sailing system and warranty work (Exhibit 2, Tr. 32/4-25) and (3) the odor issue (Exhibit 3, Tr. 119/14-121/10).

As the Court can see, INA specifically asked questions and addressed the issues detailed in the 2005 Letter which INA claimed to this Court they did not have, nor had access to such information during discovery.

Respectfully submitted,
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CERTIFICATE OF SERVICE

I hereby certify that on April 28, 2010, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record identified on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

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