

ONE PAGE SUMMARY OF JOHN DOE

DEPOSITION DATE: NOVEMBER 00, 0000

Plaintiff Name
Vs.
Healthcare Providers
Defendant

Examination by Attorney Name (On behalf of plaintiff)

5 John Doe introduced himself. He resided at 15425 National Pike, Frostburg, Maryland. He worked for Charles Taylor Adjusting based out of Georgia.

6 XXXXX was a field adjuster and travelled nationwide to locations.

7 XXXXX was an W2 employee of Charles Taylor Adjusting for Two years. He agreed that "this claim," meant about the STMB XXXX claim.

8 XXXXX hit on or around August 29, 2021. He was working for JS Held at that time. He had consultants and many different trades and activities. He was an W2 employee of JS Held and worked as a building consultant. He relied on his expertise in the restoration industry to assist insurance companies in determining cost and values associated with repairs to the buildings and structures.

9 He had an undergraduate degree from Liberty University in Psychology. He worked at a school for autism as the vocational director. He also worked at a church as a youth pastor during that time for two years.

10 He later became the emergency services coordinator for Jenkins Restorations. He organized the response to emergencies. He was working on behalf of property owners. Later he worked for Gayla Borne and Tonya and worked for smaller restoration and as an emergency risk coordinator.

11 He later moved over to the water mitigation and mold division, and then ended his career with them as a project manager at the repair process. He worked at Precision Flooring after a period of unemployment and then joined JS Held as a building consultant in May 2019. He remained in this role until he realized that his career had peaked on the construction side and decided to gain policy experience. Subsequently, he left JS Held and joined Charles Taylor Adjusting.

12 He initially had a background in construction and worked in maintenance for rental properties. Despite having a bachelor's degree in psychology, he realized his interest in the insurance side of the industry during his time at JS Held. He sought "policy experience" to broaden his expertise beyond construction. His attraction to the insurance sector stems from the satisfaction of handling situations correctly, being unbiased, and applying the reality of situations based on policies.

13 He was learning about policy interpretation through classes and continuing education required for licensing. The desire to understand whether something applies or not refers to interpreting policies and applying their terms to real-life claims. The motivation for this came from experiences at JS Held, dealing with massive claims like grain piers and structure fires, where questions about coverage and limitations arose. He sought the opportunity at Charles Taylor Adjusting to gain experience in the insurance side of the industry and is grateful for the knowledge acquired.

14-15 He was never deposed before, and this was his first deposition.

- 16 In preparation for the deposition, he had a 30-second conversation with Rebecca.
At JS Held, he was not tasked with interpretation of policies or application of policy provisions. He decided around August 20 of 2019 he started looking for a position where interpretation of policies would be a part of his work.
- 17 He learned about Charles Taylor Adjusting (CTA) after working with a CTA adjuster, Robby Arnold, on a large crane collapse. Developing a good relationship with Arnold influenced him to join CTA, and he started working there in October of '21, after Hurricane Ida. Initially he was hired as a general adjuster, specifically a field adjuster handling property claims, he described a general adjuster as someone experienced but not at the level to manage a national profile independently. He collaborated with other adjusters who guided him through the adjusting process.
- 18 He started working at XXXXXXXX in October of '21 as a general adjuster. He explained that the main difference between a general adjuster and a building consultant lies in the ability to interpret policy provisions and apply them appropriately. While a building consultant addresses structural problems and building repairs, they are not responsible for parsing whether those items are covered within a policy. The general adjuster, on the other hand, has the responsibility of interpreting and applying policy provisions.
- 19 He was not assigned the STMB claim as his first at Charles Taylor Adjusting (CTA). Prior to that, he had been assigned several claims, including the one involving a water loss in a high-rise condominium in Miami. Ahmad Kasem was delegated authority through Sedgwick.
- 20 He understood that he was being deposed as a person and not as an organization.
- 21 Ahmad Kasem was working at Sedgwick on behalf of Velocity Claims. The actual insurance is Underwriters at Lloyd's. The people at Sedgwick act as desk adjusters.
- 22 Sedgwick was different from Velocity. He acknowledged that Sedgwick did not have field adjusters on staff. Ahmad was a desk adjuster for the claim. He did not know Sam Juliano. Jan Hall's name was familiar to him. Jason Saylor at Charles Taylor was the person who asked him to assist on the claim in question.
- 23 XXXXX did not know if Jason Saylor was still employed there. He saw him to be employed at Crawford. He has five hundred connections on LinkedIn but denied being an influencer. He recalled that Jason Saylor was previously at Crawford & Company. He does not know why the person left Charles Taylor Adjusting (CTA) or when. Jason Saylor, he acknowledged that Saylor is a national general adjuster, affirming that national general adjusters are considered above general adjusters.
- 24 He acknowledged Amanda McWhorter as the original field adjuster for the claim. He believed she was no longer with Charles Taylor Adjusting (CTA) and thought she was fired but did not know the specific reason or when it happened.
- 25-27 He knew Carlos Martinez at JS Held.
- 28 STMB claim was not the first claim that he was assigned with CTA. He agreed that a global company that worked for insurance partners, self-insureds, corporations. They had an emergency rescue division.
- 29 CTA was the third-party adjusting company on this claim. Sedgwick had the desk adjusters and CTA was the IA or field adjusting company. "Independent adjuster" was the term.
- 30 He was unable to interpret policy at that time. He understood the problem. He never worked with Amanda. He was the national general adjuster on STMB file at the time you became the general adjuster on the STMB file.
- 31 Jason handed in a file that needed some estimating done for damages from photos, so he helped drafting a report that would then send off to meet requirements for the agreements for the file. He was not told to

go perform a field inspection at first. He received documentation that Amanda had taken when she was on site and wrote his estimate based off her documentation.

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His initial role was to take the photos from Amanda's inspection and create an Xactimate estimate. He did perform a field inspection later to verify some interior damages because the photos were not sufficient.

(Deposition concluded at 1:04 p.m.)

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