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14 Attorneys for CONSUMER WATCHDOG

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BEFORE THE INSURANCE COMMISSIONER  
OF THE STATE OF CALIFORNIA

In the Matter of the Rate Application of  
United Services Automobile Association,  
Applicant.

File No.: 23-3147

**CONSUMER WATCHDOG'S  
PETITION FOR HEARING,  
PETITION TO INTERVENE, AND  
NOTICE OF INTENT TO SEEK  
COMPENSATION**

[Ins. Code §§ 1861.05 and 1861.10; Cal.  
Code Regs, tit. 10, §§ 2653.1, 2661.2  
and 2661.3]

1 Consumer Watchdog hereby requests that the Insurance Commissioner notice a public  
2 hearing pursuant to Insurance Code sections 1861.05, subdivisions (a) and (c), and 1861.10,  
3 subdivision (a), on the issues raised in this petition regarding the above-referenced Rate  
4 Application of United Services Automobile Association (“USAA” or “Applicant”), at which  
5 time Applicant will be directed to appear and respond to the issues raised in this petition.  
6 Consumer Watchdog also hereby requests that it be granted leave to intervene in the proceeding  
7 on Applicant’s Rate Application pursuant to Insurance Code section 1861.10(a). Consumer  
8 Watchdog intends to seek compensation in this proceeding, and, pursuant to California Code of  
9 Regulations, title 10 (“10 CCR”), section 2661.3 subdivision (c), Consumer Watchdog’s  
10 proposed budget is attached hereto as Exhibit A.

11 In support of its petition, Consumer Watchdog alleges:

12 **I. THE APPLICATION**

13 1. On or about October 25, 2023, Applicant filed a Prior Approval Rate Application  
14 with the California Department of Insurance (“CDI”), seeking approval of an overall 20.2% (\$53  
15 million) rate increase to its base rates for its Owners (HO-3), Unit-Owners (HO-6), Renters  
16 Contents, and Renters Liability policies for its homeowners line of insurance. (File No. 23-3147  
17 [“the Application”]). The proposed effective date of the Application is August 1, 2024.

18 2. On or about November 3, 2023, the public was notified by the CDI of the  
19 Application.

20 **II. PETITIONER**

21 3. Petitioner Consumer Watchdog is a nonprofit, nonpartisan public interest  
22 corporation organized to represent the interests of consumers and taxpayers. A core focus of  
23 Consumer Watchdog’s advocacy is the representation of the interests of insurance consumers  
24 and policyholders, particularly as they relate to the implementation and enforcement of  
25 Proposition 103, in matters before the Legislature, the courts, and the CDI.

26 4. Consumer Watchdog’s founder authored Proposition 103 and led the successful  
27 campaign for its enactment by California voters in 1988. Consumer Watchdog’s staff and  
28

1 consultants include some of the nation’s foremost consumer advocates and experts on insurance  
2 ratemaking matters.

3 5. Consumer Watchdog has served as a public watchdog with regard to insurance  
4 rates and insurer rollback liabilities under Proposition 103 by: monitoring rollback settlements  
5 and the status of the rollback regulations; reviewing and challenging rate filings made by insurers  
6 seeking excessive rates; participating in rulemaking and adjudicatory hearings before the CDI;  
7 and educating the public concerning industry underwriting and rating practices, their rights under  
8 Proposition 103, and other provisions of state law. Consumer Watchdog has also initiated and  
9 intervened in actions in state court and appeared as amicus curiae in matters involving the  
10 interpretation and application of Proposition 103 and the Insurance Code.<sup>1</sup>

11 6. Consumer Watchdog has initiated and intervened in numerous proceedings before  
12 the CDI related to the implementation and enforcement of Proposition 103’s reforms, including  
13 over 140 such proceedings in the last twenty years. In every proceeding that has resulted in a  
14 final decision and in which Consumer Watchdog sought compensation from 2003–2022, the  
15 Commissioner found that Consumer Watchdog made a substantial contribution, meaning that its  
16 participation was separate and distinct from any other party and that it presented relevant issues,  
17 evidence, and arguments that resulted in more credible, non-frivolous information being  
18 available to the Commissioner in making his final decision.

19 **III. ISSUES AND EVIDENCE TO BE PRESENTED AND POSITIONS OF PETITIONER**

20 7. In the rate proceeding initiated by Consumer Watchdog’s petition, Consumer  
21 Watchdog will present and elicit evidence to show that the rate proposed in the Application is  
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23  
24 <sup>1</sup> For example, *Calfarm Ins. Co. v. Deukmejian* (1989) 48 Cal.3d 805; *20th Century Ins. Co. v.*  
25 *Garamendi* (1994) 8 Cal.4th 216; *Amwest Surety Ins. Co. v. Wilson* (1995) 11 Cal.4th 1243;  
26 *Proposition 103 Enforcement Project v. Quackenbush* (1998) 64 Cal.App.4th 1473; *Spanish*  
27 *Speaking Citizens’ Found. v. Low* (2000) 85 Cal.App.4th 1179; *Donabedian v. Mercury Ins. Co.*  
28 *(2004) 116 Cal.App.4th 968; State Farm Mut. Auto. Ins. Co. v. Garamendi* (2004) 32 Cal.4th  
1029; *The Found. for Taxpayer and Consumer Rights v. Garamendi* (2005) 132 Cal.App.4th  
1354; *Ass’n of Cal. Ins. Cos. v. Poizner* (2009) 180 Cal.App.4th 1029; *Mercury Cas. Co. v.*  
*Jones* (2017) 8 Cal.App.5th 561; *Mercury Ins. Co. v. Lara* (2019) 35 Cal.App.5th 82; and *State*  
*Farm General Ins. Co. v. Lara* (2021) 71 Cal.App.5th 197.

1 excessive and/or unfairly discriminatory in violation of Insurance Code section 1861.05,  
2 subdivision (a), which provides that “[n]o rate shall be approved or remain in effect which is  
3 excessive, inadequate, [or] unfairly discriminatory.” Additionally, Consumer Watchdog will  
4 present and elicit evidence that Applicant’s proposed rate violates 10 CCR § 2644.1, which  
5 provides that “[n]o rate shall be approved or remain in effect that is above the maximum  
6 permitted earned premium as defined in section 2644.2.”

7 8. Based on Consumer Watchdog’s preliminary analysis in consultation with its  
8 actuarial expert, and the information contained in the Application and publicly available on the  
9 CDI’s website, Consumer Watchdog has identified the following issues with the Application on  
10 which it intends to present and elicit evidence as set forth in (a)–(c) below. Each of these issues  
11 is directly relevant to determining whether Applicant’s proposed rate increase is excessive under  
12 Insurance Code section 1861.05(a). Consumer Watchdog intends to request further information  
13 on these issues through informal/formal discovery from the Applicant and reserves the right to  
14 develop and refine its positions as more information is made available.

15 a. Loss and Premium Trends (10 CCR § 2644.7): Applicant’s selected frequency,  
16 severity, and premium trend values result in excessive net trends which overstate the  
17 projected losses, causing an inflated rate indication. Consumer Watchdog’s  
18 preliminary analysis shows that lower trend factors, reflecting the latest data but also  
19 incorporating additional historical experience, are more actuarially sound. To  
20 evaluate the frequency, severity, and premium trends, we analyzed actual and fitted  
21 net trends graphically, by coverage, for each of the possible loss trend bases (Closed/  
22 Paid, Reported/Paid, Closed/Total Paid, and Reported/Total Paid). We then selected  
23 the most reasonable net trend line for each coverage using the frequency, severity,  
24 and premium trends available in the Standard Exhibits file. For example, for HO-3,  
25 Consumer Watchdog’s selected net trend using the 16-pt Closed/Paid fit is +4.0%,  
26 compared to the +9.0% net trend selected by USAA, which is in line with only the  
27 latest few quarters of data and fails to give enough weight to the more consistent data  
28 points in the pre-pandemic period. As another example, for HO-6, Consumer

1 Watchdog’s selected net trend using the 24-pt Closed/Paid fit is +5.5%, compared to  
2 the +11.1% net trend selected by USAA, which does not adequately reflect the impact  
3 of decreases occurring in the actual net trend values. Consumer Watchdog’s analysis  
4 produces an overall rate indication that is substantially lower than the 20.2% rate  
5 increase proposed by USAA. Additionally, USAA is in violation of the Prior  
6 Approval Rate Template Instructions, as it has selected a frequency trend of 0% for  
7 all coverages without that value being among the 20 available point fits for any of the  
8 coverages. USAA has also selected premium trend values independently of loss trend  
9 values, and has attempted to justify this by simply noting the “point fit best  
10 supporting” the arbitrarily selected net trends, even though those point fits are not  
11 actually used in the analysis. Per page 35 of the 6/5/2023 Edition of the Prior  
12 Approval Rate Filing Instructions: “The number of data points in the trend selection  
13 must be the same for the premium trend and the loss trend.” Thus, Consumer  
14 Watchdog’s current position, to the extent now known, is that USAA is seeking an  
15 unjustified rate increase, and has failed to comply with the Prior Approval Rate  
16 Template Instructions.

17 b. Improper Loss Development (10 CCR § 2644.6): USAA is again in violation of the  
18 Prior Approval Rate Filing Instructions, as several required data triangles are not  
19 provided (paid loss & DCCE, paid DCCE, incurred loss & DCCE, incurred DCCE).  
20 Per page 33 of the 6/5/2023 Edition of the Prior Approval Rate Filing Instructions:  
21 “Note that triangles are required for paid loss & DCCE, paid loss, paid DCCE,  
22 incurred loss & DCCE, incurred loss, incurred DCCE (if tracked), reported claim  
23 counts, paid claim counts, closed with payment claim counts, and closed with no  
24 payment claim counts.” Without this required data, Consumer Watchdog is unable to  
25 take a position on the actuarial soundness of USAA’s loss development methodology  
26 at this time.

27 c. Improper / Unsupported Excluded Expenses (10 CCR § 2644.10): Applicant has not  
28 shown that the \$8,125,505 of institutional advertising expenses listed on page 4.1 of

1 the Prior Approval Rate Template is appropriate. Consumer Watchdog's current  
2 position, to the extent now known, is that Applicant has failed to provide sufficient  
3 information in the filing to support its claim that 1% of advertising expenses over the  
4 last three years have been institutional. Per the regulation: "Institutional advertising'  
5 means advertising not aimed at obtaining business for a specific insurer and not  
6 providing consumers with information pertinent to the decision whether to buy the  
7 insurer's product." It seems highly unlikely that only 1% of Applicant's advertising  
8 expenses were for institutional advertising over the last three years. Based on the  
9 information currently available in the Application, and subject to review of additional  
10 information that may be obtained from Applicant during the proceeding through  
11 formal or informal discovery on these and other excluded expenses items, it is  
12 Consumer Watchdog's position that Applicant has not proven that its excluded  
13 expense ratio of 0.1% shown on page 4.2 of the Prior Approval Rate Template is  
14 appropriate. Consumer Watchdog reserves the right to seek discovery and raise  
15 additional issues regarding the accuracy of the amounts listed in page 4.2 of the Prior  
16 Approval Rate Template for other categories of excluded expenses that should be  
17 reflected in the rate calculation but may not be adequately reflected in the filing,  
18 including political contribution and lobbying expenses, excessive executive  
19 compensation, bad faith judgments and associated DCCE, costs of unsuccessful  
20 defense of discrimination claims, and fines and penalties.

21 The Department should order USAA to refile its Application in compliance with the  
22 regulations and Prior Approval Rate Filing Instructions and re-notice the corrected Application  
23 to allow for the 45-day public notice period required by Insurance Code section 1861.05(c).

24 9. This petition is based upon Consumer Watchdog's preliminary analysis of the  
25 Application. Thus, Consumer Watchdog reserves the right to modify, withdraw, and/or add  
26 issues for consideration as more information becomes available, including but not limited to  
27 violations of Insurance Code section 1859 if it is discovered during the course of the proceeding  
28 that Applicant has willfully withheld information from, or knowingly given false or misleading

1 information to, the Commissioner or to any rating organization, advisory organization, insurer or  
2 group, association, or other organization of insurers that will affect its rates, rating systems, or  
3 premiums that are the subject of this filing.

4 **IV. AUTHORITY FOR PETITION AND GRANTING REQUEST FOR A HEARING**

5 10. The authority for this petition for hearing is Insurance Code section 1861.10,  
6 subdivision (a), which grants “any person” the right to initiate or intervene in a proceeding  
7 permitted or established by Proposition 103 and the right to enforce Proposition 103.  
8 Specifically, as stated above, Consumer Watchdog initiates this proceeding to enforce Insurance  
9 Code section 1861.05 and the Commissioner’s regulations.

10 11. Additionally, a hearing is authorized pursuant to Insurance Code section 1861.05,  
11 subdivision (c), which allows “a consumer or his or her representative” to request a hearing on a  
12 rate application and 10 CCR § 2653.1, which provides that “any person, whether as an  
13 individual, representative of an organization, or on behalf of the general public, may request a  
14 hearing by submitting a petition for hearing.”

15 12. This petition is timely pursuant to Insurance Code section 1861.05, subdivision  
16 (c), and 10 CCR § 2646.4(a)(1) because it is filed within forty-five (45) days of the November 3,  
17 2023 public notice date.

18 **V. INTEREST OF PETITIONER**

19 13. Consumer Watchdog’s interest in the above-captioned proceeding is to ensure that  
20 Applicant’s homeowners insurance policyholders are charged rates and premiums that comply  
21 with the provisions of Insurance Code section 1861.05(a)’s requirement that “no rate shall be  
22 approved or remain in effect which is excessive, inadequate, [or] unfairly discriminatory or  
23 otherwise in violation of this chapter,” and the requirements contained in the regulations  
24 promulgated thereunder. For many homeowners, their home is their most valuable asset and they  
25 are required to purchase homeowners insurance by their mortgage lenders. Consumers who are  
26 overcharged by insurers for this insurance coverage and/or arbitrarily non-renewed are part of  
27 Consumer Watchdog’s core constituency.  
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1           14. As noted in paragraphs 3–6 *supra*, Consumer Watchdog’s staff and consultants  
2 have substantial experience and expertise in insurance rate matters, which Consumer Watchdog  
3 believes will aid the CDI in its review of the Application and aid the Commissioner in making  
4 his ultimate decision as to whether to approve or disapprove the requested rate. As noted in  
5 paragraph 6 above, the Commissioner found that Consumer Watchdog has made a substantial  
6 contribution to his decisions in every rate proceeding that has resulted in a final decision and in  
7 which Consumer Watchdog sought compensation from 2003–2022. If leave to intervene is  
8 granted, Consumer Watchdog will participate fully in all aspects of this proceeding.

9           15. Consumer Watchdog also has an interest in ensuring that Applicant, the CDI, and  
10 the Insurance Commissioner comply with the laws enacted by the voters under Proposition 103,  
11 and the rules and regulations that implement those laws, including that all information submitted  
12 to the CDI in connection with the Application is made publicly available.

13 **VI. AUTHORITY FOR PETITION TO INTERVENE**

14           16. The authority for Consumer Watchdog’s petition to intervene is Insurance Code  
15 section 1861.10, subdivision (a), which grants “any person” the right to “initiate or intervene in  
16 any proceeding permitted or established pursuant to this chapter [Chapter 9 of Part 2 of Division  
17 1 of the Insurance Code] . . . and enforce any provision of this article.” This proceeding is a  
18 proceeding to enforce Insurance Code section 1861.05, pursuant to Insurance Code section  
19 1861.10(a), and hence is a proceeding both “permitted” and “established” by Chapter 9. Per the  
20 voters’ instruction, the mandatory right to intervene under section 1861.10(a), like all the  
21 provisions of Proposition 103, must be “liberally construed and applied in order to fully promote  
22 its underlying purposes.” (Prop. 103, § 8.) Thus, section 1861.10 must be interpreted and applied  
23 broadly in a manner to fully encourage consumer participation. (*Ibid.*; see also *Ass’n of*  
24 *California Ins. Cos. v. Poizner, supra*, 180 Cal.App.4th at 1052 [stating “the goal of fostering  
25 consumer participation in the administrative rate-setting process” as “one of the purposes of  
26 Proposition 103”].) The broad intervention standard enacted by section 1861.10 ensures that  
27 consumers will be able to participate in proceedings *independently of the CDI staff* who may take  
28 different positions or emphasize different issues in the proceeding, and with all rights accorded



1 to any other party, including the right to raise additional issues and/or violations as they become  
2 known during the course of the proceeding through informal or formal discovery.

3 17. This petition to intervene is also authorized by 10 CCR § 2661.1 et seq. In  
4 compliance with 10 CCR § 2661.3, the specific issues to be raised and positions to be taken by  
5 Consumer Watchdog, *to the extent known at this time*, are set forth in paragraph 8, *supra*. Each  
6 of these issues relate directly to specific standards and requirements under the ratemaking  
7 formula at 10 CCR § 2644.1 et seq. and under the Prior Approval Rate Template Instructions,  
8 and thus are directly relevant to ultimately determining whether Applicant's requested rate is  
9 excessive or otherwise unjustified. Although consumer presence in departmental proceedings  
10 typically results in significant reductions to policyholders' rates, the amount of savings for each  
11 individual consumer is outweighed by the time and expense of hiring individual counsel or an  
12 advocacy group to protect his or her rights. Thus, an independent organization like Consumer  
13 Watchdog introduces a voice that otherwise would be absent from this proceeding.

14 **VII. PARTICIPATION OF CONSUMER WATCHDOG**

15 18. Consumer Watchdog verifies, in accordance with 10 CCR § 2661.3, that it will be  
16 able to attend and participate in this proceeding without unreasonably delaying this proceeding  
17 or any other proceedings before the Insurance Commissioner.

18 **VIII. INTENT TO SEEK COMPENSATION**

19 19. The Commissioner has awarded Consumer Watchdog compensation for its  
20 reasonable advocacy and witness fees and expenses in past departmental proceedings. The  
21 Commissioner issued Consumer Watchdog's latest Finding of Eligibility on July 26, 2022,  
22 effective for two years as of July 12, 2022. Consumer Watchdog was previously found eligible to  
23 seek compensation on August 25, 2020, effective as of July 12, 2020; July 12, 2018; July 14,  
24 2016; July 24, 2014; July 24, 2012; July 2, 2010; August 25, 2008; July 14, 2006; July 2, 2004;  
25 June 20, 2002; October 1, 1997; September 26, 1995; September 27, 1994; and September 13,  
26 1993.


27 20. Consumer Watchdog intends to seek compensation in this proceeding. Pursuant to  
28 10 CCR § 2661.3(c), Consumer Watchdog's estimated budget in this proceeding is attached

1 hereto as Exhibit A. Consumer Watchdog has based its estimated budget on several factors  
2 including: (1) the technical and legal expertise needed to address these issues; (2) its current best  
3 estimate of the time needed to participate effectively in these proceedings, taking into account  
4 the time already expended by Consumer Watchdog’s legal and actuarial staff and an estimate of  
5 time needed to complete remaining tasks through completion of a noticed evidentiary hearing;  
6 and (3) past experience in similar rate proceedings before the CDI. The estimated budget is  
7 reasonable and the staffing level is appropriate, given the expertise that Consumer Watchdog and  
8 its consultants bring to these proceedings when the issues involved are issues at the very core of  
9 its organizational mission and strike at the very heart of Proposition 103 itself. The budget  
10 presented in the attached Exhibit A is a preliminary estimate, and Consumer Watchdog reserves  
11 the right to amend its proposed budget as its expenses become more certain, or in its request for  
12 final compensation. Consumer Watchdog will give notice of such modifications as soon as  
13 practicable after it discovers the need to revise its estimates and shall comply with the budget  
14 revision requirements in the relevant intervenor regulations.

15 WHEREFORE, Consumer Watchdog respectfully requests that the Insurance  
16 Commissioner GRANT its petition for hearing and petition to intervene in the proceeding,  
17 having all rights and responsibilities accorded any other party to the proceeding.

18  
19 DATED: December 18, 2023

Respectfully submitted,  
Harvey Rosenfield  
Pamela Pressley  
Benjamin Powell  
Ryan Mellino  
CONSUMER WATCHDOG

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24 By:   
Benjamin Powell  
Attorneys for CONSUMER WATCHDOG  
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**EXHIBIT A  
PRELIMINARY BUDGET**

**ITEMS**

**ESTIMATED COST**

1. Consumer Watchdog Attorneys and Paralegal

Pamela Pressley (Senior Staff Attorney) @ \$595 per hour, 100 hours ..... \$59,500

- Draft and edit petition for hearing and petition to intervene; supervise Consumer Watchdog counsel; oversee preparation of motions, briefing; confer with Consumer Watchdog counsel and outside experts regarding legal and evidentiary issues; participate in discussions with CDI and Applicant’s counsel; assist in all phases of proceeding, evidentiary hearing, and preparation of post-hearing briefing.

Benjamin Powell (Staff Attorney) @ \$350 per hour, 200 hours ..... \$70,000

- Confer with Consumer Watchdog counsel and outside experts regarding legal and evidentiary issues; participate in discussions with CDI and Applicant’s counsel; participate in briefing legal issues; conduct discovery, preparation of motions, and preparation for evidentiary hearing; participate in examination of witnesses and all phases of evidentiary hearing and post-hearing legal briefing; prepare request for compensation.

Ryan Mellino (Staff Attorney) @ \$250 per hour, 200 hours ..... \$50,000

- Confer with Consumer Watchdog counsel and outside experts regarding legal and evidentiary issues; participate in discussions with CDI and Applicant’s counsel; participate in briefing legal issues; conduct discovery, preparation of motions, and preparation for evidentiary hearing; participate in examination of witnesses and all phases of evidentiary hearing and post-hearing legal briefing; prepare request for compensation.

Kaitlyn Gentile (Paralegal) @ \$200 per hour, 50 hours ..... \$10,000

- Draft and edit petition for hearing and petition to intervene; assist with discovery and preparation of motions and briefs; prepare request for compensation.

Harvey Rosenfield (Of Counsel) @ \$695 per hour, 15 hours ..... \$10,425

- Supervise Consumer Watchdog counsel and participate in strategy discussions.

2. Expert Witness: Ben Armstrong

Ben Armstrong, Staff Actuary @ \$425 per hour, 100 hours ..... \$42,500

- Staff actuary to review all discovery documents; prepare actuarial analysis; participate in meet and confers with the parties as needed; prepare written testimony; testify and assist attorneys in preparation for cross-examination of insurer’s expert witnesses.

1 3. Consumer Watchdog Expenses

2 Office expenses (photocopies, facsimile, telephone calls, postage, etc.) .....\$2,000

3 Travel (ground transportation; airfare; hotel) .....\$5,000

4 Consumer Watchdog Subtotal .....\$249,425

5  
6 4. Expert Witness: AIS Risk Consultants, Inc.

7 Allan I. Schwartz, President of AIS Risk Consultants @ \$915 per hour, 50 hours ..... \$45,750

- 8 • Consulting actuary to review all discovery documents; prepare actuarial analysis;  
9 participate in meet and confers with the parties as needed; prepare written testimony;  
10 testify and assist attorneys in preparation for cross-examination of insurers' expert  
witnesses.

11 Katherine Tollar @ \$415 per hour, 50 hours ..... \$20,750

- 12 • Assist Mr. Schwartz in document review, rate level analysis, preparation of testimony.

13 TOTAL ESTIMATED BUDGET: ..... \$315,925

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**PROOF OF SERVICE**  
**BY OVERNIGHT OR U.S. MAIL, FAX TRANSMISSION,**  
**EMAIL TRANSMISSION AND/OR PERSONAL SERVICE**

**State of California, City of Los Angeles, County of Los Angeles**

I am employed in the City and County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 6330 South San Vicente Boulevard, Suite 250, Los Angeles, California 90048, and I am employed in the city and county where this service is occurring.

On December 18, 2023, I caused service of true and correct copies of the document entitled

**CONSUMER WATCHDOG'S PETITION FOR HEARING, PETITION TO INTERVENE,  
AND NOTICE OF INTENT TO SEEK COMPENSATION**

upon the persons named in the attached service list, in the following manner:

1. If marked FAX SERVICE, by facsimile transmission this date to the FAX number stated to the person(s) named.
2. If marked EMAIL, by electronic mail transmission this date to the email address stated.
3. If marked U.S. MAIL or OVERNIGHT or HAND DELIVERED, by placing this date for collection for regular or overnight mailing true copies of the within document in sealed envelopes, addressed to each of the persons so listed. I am readily familiar with the regular practice of collection and processing of correspondence for mailing of U.S. Mail and for sending of Overnight mail. If mailed by U.S. Mail, these envelopes would be deposited this day in the ordinary course of business with the U.S. Postal Service. If mailed Overnight, these envelopes would be deposited this day in a box or other facility regularly maintained by the express service carrier, or delivered this day to an authorized courier or driver authorized by the express service carrier to receive documents, in the ordinary course of business, fully prepaid.

I declare under penalty of perjury that the foregoing is true and correct. Executed on December 18, 2023 at Los Angeles, California.

  
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Kaitlyn Gentile

## Service List

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Nikki McKennedy  
Lisbeth Landsman-Smith  
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