

PLEASE TAKE NOTICE, that the defendants **ANDRAS KELE**
EXPRESS, INC. by attorneys, the LAW OFFICE OF ANDREA G. SAWY
forth the following upon information and belief as a response to the Prelim
Order of the Honorable Justice Jackman-Brown dated February 14, 2019.

1. The defendant is insured by Travelers Insurance Company with
\$1,000,000.00.

2. At the present time the defendant is not aware of any excess,
umbrella insurance coverage. If and when such excess coverage is discovered
be notified accordingly.

3. At the present time the defendant is not in possession of any
statements, if and when any such adverse party statements are discovered
provided to all parties.

4. Annexed hereto as *Exhibit "A"* are photographs.

5. At the present time the defendant is not in possession of any ph
plaintiff's injury. If and when any such photographs become available
exchanged with all parties.

6. At the present time the defendant is not aware of any eyewitnesses.
If and when any such eyewitness(es) is/are discovered, their name(s) and ad
provided to all parties.

10. Attached hereto as *Exhibit "B"* estimates.

PLEASE TAKE FURTHER NOTICE, that the undersigned res
supplement and/or alter any or all of the foregoing if and when additional
information becomes available.

Dated: February 22, 2019
Melville, New York

Yours, etc.

LAW OFFICE OF ANDREA

By: 
DAVID I. ROBINSON

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ANDRAS KELEMEN and
JED EXPRESS, INC.

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EXHIBIT "A"





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