

Dealing with insurance defense counsel on a daily basis can be frustrating, even annoying sometimes, especially if you're a younger lawyer unfamiliar with "insurance defense speak." To assist the members of CASD by preparing them for what to expect, I have prepared this handy guide, which I call "Insurance Defense Bingo." It's a fun game you can play in virtually every case and in every conversation with insurance defense counsel.

INSURANCE DEFENSE BINGO

WE NEED MORE DISCOVERY TO EVALUATE YOUR SETTLEMENT OFFER	MY CLIENT HAS NOW PRODUCED ALL DOCUMENTS THAT COULD BE LOCATED	IM NOT AUTHORIZED TO DISCLOSE THE INSURANCE INFORMATION	THE PURPOSE OF THIS LETTER IS TO "MEET AND CONFER"	THIS IS SO IMPORTANT WE ARE GOING EX PARTE
YOU HAVE FAILED TO MEET AND CONFER WITH ME	YOUR CLIENT HAS CREDIBILITY ISSUES	BUT ITS JUST A SOFT TISSUE INJURY	LETS COOPERATE IN SCHEDULING DISCOVERY	WE HAVE SCHEDULING CONFLICTS WITH THE DEPOSITIONS
WE WILL BE FORCED TO SEEK ANOTHER TRIAL CONTINUANCE	WE HAVE MADE YOU A VERY GENEROUS OFFER	★	FINE, WE'D LIKE TO GO TO MEDIATION	YOUR CLIENTS SETTLEMENT DEMAND IS BEING CONSIDERED
THE SETTLEMENT CHECK IS IN THE MAIL	AN ADJUSTER HAS BEEN FULLY BRIEFED ON THE ISSUES	IT'S NOT ME. IT'S MY CLIENT.	WITH ALL DUE RESPECT	WE HAVE DISPOSITIVE MOTIONS
WE INTEND TO APPEAL	IT WILL ALL BE IN OUR MOTIONS IN LIMINE	WE REGRET HAVING TO SEEK SANCTIONS	IT'S ALL IN OUR 3 RD DEMURRER	OUR CARRIER WONT PAY FOR THAT

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Dan Stanford is the senior trial attorney at Stanford, Ryan & Associates, A.P.C., a San Diego based law firm specializing in the prosecution of legal malpractice claims throughout California. Dan is a State Bar Certified Legal Malpractice Specialist who is regularly listed in Super Lawyers, Best Lawyers in America, and Martindale-Hubble as "AV Preeminent."