

## Curriculum Vitae

of

**Donald D. Stafford**

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### Summary/Overview:

My work with property insurance claim related matters for over 30 years has positioned me to speak in an expert capacity regarding the valuation of personal property and commercial contents as related to insurance claims settlement and in other matters requiring valuation expertise.

During my career, my associates and I have had the opportunity to assist insurance adjusters in the preparation and resolution of well over 1 million contents claims. My education and unique level of experience, accumulated over a career spanning 47 years, has afforded me the opportunity to develop specialized technical knowledge and skill in contents valuation and insurance claims practice. This enables me to render expert findings, fair and impartial opinions, using research and valuation methods generally accepted in this field of endeavor.

Whether in Deposition, Testimony at Trial, or in Written Report for the consideration of the court, I deliver an objective analysis and evaluation of the evidence presented in any particular case. I also can act in an Expert Consultant capacity in the event research or comments are required on a particular case or body of evidence.

In the area of Alternative Dispute Resolution, acting as Appraiser, I provide objective, independent review, analysis and testimony when a claim has been remanded to Appraisal. In regard to contents, with my technical knowledge, I can properly address all the key issues and disputes within the differing analyses of the claim and do so within the parameters of the applicable policy. Ultimately, I present a qualified and solid foundation for my findings and seek to do so in a clear and precise way.

### Education:

1970 – 1973, Undergraduate studies, New England Conservatory

1995, MBA with Honors, Northeastern University, Beta Gamma Sigma Honor Society for Collegiate Schools of Business

## **Employment History:**

### **Various: 1973 – 1983**

Sales and management positions with various companies involved in the retail sale and wholesale distribution of appliances, consumer electronics and recorded music.

### **President, Insurers World aka Home Entertainment Distributors Inc., Canton, MA: 1984 – 2012**

The principal business of Insurers World was in the service of insurance carriers in relation to personal and commercial property claims. Services lines of business included: contents valuation software, on site scope of loss, valuation of contents through the research of like kind and quality replacement items and their associated replacement cost values. During my tenure, I was responsible for corporate management, insurance carrier relations, production practices, strategic initiatives, claims business logic, good faith compliance and product development.

### **Executive Vice President, Via Group LLC, Canton, MA: 1996 – 2012**

Via Group was founded to accommodate the spinoff and merger of the contents software divisions of Insurer's World and Waxman Insurance Services. I held this position simultaneously with my employment at Insurers World.

### **Senior Vice President & National Consulting Executive, Enservio Inc., Needham, MA: 2012 – 2015**

I joined Enservio following their acquisition of Insurers World. Enservio is a technology and services company dedicated to the insurance industry and its claimants. Enservio software and service solutions include on site inventory, valuation, payments and contents replacement. My initial responsibilities were to assist in the transition and integration related to the acquisition and merger. My role developed to include internal consultation related to sales, product development, data analysis, claims market trends and customer experience. As consultant, I also worked with clients addressing issues regarding work flow, claims process and procedure.

### **Sales Consultant, Best Buy, Boston, MA: 2018 to 2021**

Retail sale of home theater, appliances and other consumer electronics.

### **Principal, Stafford Claims Consulting LLC: 2015 to Present**

Stafford Claims Consulting has 2 areas of focus. Litigation support in the form of consulting, dispute resolution, appraisal and expert witness services. The other area of endeavor is in consulting with insurance carriers on claims practice and process seeking to enhance efficiency, accuracy and customer satisfaction.

## Experience/Achievements:

In my career spanning 4 decades, 31 years as President of Insurer's World and more recently as SVP at Enservio, I, with my associates, have had the great pleasure of assisting a broad range of carrier clients – from Top Tier National writers and Super Regionals to local Mutuals – in the preparation, presentation and resolution of well over 1 million contents claims. Our work together benefited policyholders, indemnifying them for their losses, through settlements of over \$10 billion related to contents.

The shared objective with every claim was to ensure that each was handled expeditiously and accurately, within the terms and conditions of the policy, to allow for a fair, supported and credible settlement that, in the claims moment of truth, would be contributory to customer satisfaction.

In describing my experience and achievements, self-promotion makes it tempting to use the descriptive: Visionary. In truth, I have been fortunate to live in a period of great technological change and have had the benefit of working with a great many carrier executives, claims managers, front line adjusters and policyholders, all of whom have been very generous with me by sharing their insights, thoughts and knowledge about good faith claim process and their needs in adjusting contents claims. Over the years, together, we developed and enhanced contents best practices driving forward continuous improvement.

When I joined the industry, in regard to contents, the adjuster's tools of the trade were a legal pad, company contents paper form, pen and calculator with tape. To establish replacement cost, one compared the claimant's item descriptions to the JC Penny, Montgomery Ward, Sears and Service Merchandise catalogues. To determine depreciation amounts, the adjuster would consult a life expectancy chart and manually calculate a suitable rate. It was typical that small claims, theft and lightning, were desk adjusted by inside adjusters within the many local offices of the carriers. To establish a like kind and quality replacement value for a particular consumer electronics item, an adjuster might enlist the aid of a product specialist by calling them on the phone, stipulating the brand and model and the specialist would identify a current LKQ item and its current replacement cost. I would estimate the number of insurance replacement specialist employees participating in claims at that time was ~50.

In the intervening years, in the industry adoption of technology, I worked with, and then led, teams in the design, development and delivery of contents estimating software that allowed for increased speed, efficiency, accuracy and consistency in the handling of contents claims. These started with green screen-main frame efforts, to the 1st Windows based system, leading to one of today's foremost internet delivered SaaS Carrier-Insured-Vendor collaborative contents platforms. I personally led training sessions for over 1,000 adjusters during this time. Today contents software features include seamless research of LKQ replacement items and RC values, the

application and adjustment of category specific depreciation dependent on condition, settlement calculation that accounts for policy, special limits and the amount of deductible to be absorbed when damages exceed limits, as well as routines to handle replacement cost recovery and payment of recoverable depreciation.

I participated in the roll out of the nation's first carrier centralized call center devoted to theft as a peril specialty, this a precursor to today's Fast Path initiatives, many of which I have been involved with since. Here the insurance adjuster would outsource the LKQ/RCV contents item analysis to my firm, the adjuster would in turn leverage the response, within the contents software, to provide an adjusted settlement for the claimant. With this process, lower severity contents claims, typically theft and lightning, could be adjudicated in hours as opposed to days or weeks.

Expanding on the concepts of peril specialty and contents efficiency, I had opportunity to work to improve practices in high severity contents loss as well. In the case of a major fire loss, typical practice at the outset tasked the adjuster or contents valuator with LKQ analysis and pricing of the thousand or more loss items, researching one at a time, in sequence. The necessity of managing multiple claims and balancing the needs of many insureds often meant that the research effort to complete any particular claim took many weeks and often times more than a month. In this case, I was able to enhance the software to accommodate multiple research participants on any given contents claim. This allowed for coordinated and simultaneous processing of the contents research reducing cycle time to days rather than weeks.

Looking at another typical major loss practice, we found that many insureds took 6 months or longer to submit their contents lists after sustaining a major loss fire or catastrophe. Typically, the adjuster would perform a full scope of damages on the structure and would give the insured forms on which they would list their contents. The enormity of the task, combined with the other issues of getting their lives back to normal, left many insureds ill equipped for the task. Here, carrier recognition of a value add opportunity led to establishing major contents loss as a specialty. An adjuster responsible for the contents portion of the loss would be assigned to perform the on-site scope, gather information from the insured as to ages, values and those items burnt from sight. Here, I was able to assist carriers in defining the process and procedures for the on-site capture of contents qualifying details using digital voice recorders and cameras leveraging the contents software as a medium of exchange. Further, I established a business unit to provide this service as a business process outsource for carriers who either did not have sufficient scale to staff this position or for those with staff beyond current capacity.

Over the years, as the utility of contents software became the norm rather than the exception, the data warehouse of contents claims grew. This led me to analytics of contents data as an area of specialty, working with carriers in benchmarking efforts and in cost benefit analysis when considering peril differentiated processes, contents technology solutions or contents process outsource versus in house efforts.

In terms of contents claims process, I am proud of my involvement in the development of key components of current industry practice: LKQ/RCV selection tools and techniques - whether practiced by carrier adjusters in-house or outsourced to vendors, accuracy improvement in the calculation of depreciation and specialized contents handling both in FastPath and Large Loss scenarios. During my years in the field, contents as an insurance industry business process outsource has grown from employing ~50 to over 1,000 with contents specialty firms today. I have witnessed the evolution of contents property claims handling towards a more informed contents practice and process, both on the part of carrier and public adjusters, delivering an expedited claims service, with greater speed, efficiency, accuracy, consistency and transparency. Regardless of past achievements, I look forward to using my contents expertise assisting the finder of fact in the resolution of disputes that may arise in the valuation of contents.

### **Continuing Education Presentations:**

I have presented at numerous industry events, these including: the ACE Claims Conference, the Property Loss Research Bureau conferences and the National Underwriter Executive Conference.

Courses approved for adjuster continuing education credits that I have developed and presented include:

Controlling Contents Losses in Residential and Commercial Losses – addressed learning objectives of the organization of large and complex contents loss during the physical inspection and scope capture, how to establish or verify accurate values at RCV and ACV for residential and commercial contents items and repair versus replacement options in a variety of contents claim scenarios. This course was presented at the Property Loss Research Bureau's 2011 Regional Conferences in Baltimore, Indianapolis and Sacramento in June, September and November of 2011 respectively. This course was also presented at the Property Loss Research Bureau National Claims Conference held in Boston during March of 2013.

Challenging Personal Property Evaluations - was aimed at helping insurance claims adjusters better understand how to establish accurate values for musical instruments, high-end designer handbags and other designer consumer goods. Various techniques were covered for investigation, evaluation, repair, or replacement options along with tips on recognizing counterfeit items. This course was presented at the Property Loss Research Large Loss Conference in September 2011 in Chicago.

## Articles:

Are you depressed by sinkholes? Published on-line on 11/14/2014 by Property Casualty 360. Informative article advising homeowners to review and choose an appropriate level of insurance coverage. ([www.propertycasualty360.com](http://www.propertycasualty360.com))

## History of Expert Experience:

### Cases in which I have testified as an expert at trial or deposition:

Crowther Roofing and Sheet Metal of Florida, Inc v Clausen Trust, Joanie S. Clausen Revocable Trust U/A Dated April 29,2003; Joanie S. Clausen, individually, and as Trustee of the Clausen Trust; and Douglas E. Clausen individually, and as Trustee of the Clausen Trust, Case No. 15-CA 1891, Twentieth Judicial Court in and for Collier County, Florida. Consulting Expert for the Plaintiff in June 2016. Expert Report on behalf of the plaintiff in June of 2018 and Testimony at Deposition in July 2018.

George and Kaye Kartsaklis, Plaintiffs, Lexington Insurance, Intervening Plaintiff, v. Dish Network, LLC & USA Cable Satellite Entertainment Systems, Inc. Civil Action No. 2013-CP-26-7168, Court of Common Pleas, Fifteenth Judicial Circuit, County of Horry, State of South Carolina. Expert Report in May of 2016 on behalf of the Plaintiffs and Testimony at Trial in August 2016.

Gerald C. Ayoub and Claudia Ayoub v Chubb Lloyds Insurance Company of Texas Case 3:13-cv-00058-PRM U.S. District Court of Texas El Paso Division. Expert Report on behalf of the defense in May of 2016 and Testimony at Deposition in July 2016.

Jeff & Lori Kelley v. Gibson Electric LLC, Case No. 2014-CV-000178, Fourth Judicial District Court of Franklin County, Kansas. Expert Report and Testimony at Deposition on behalf of the Plaintiff in November and December of 2015 and Testimony at Trial in June of 2016.

Ruggerio v. Harleysville Preferred Insurance, Civil Action No. 3:11-cv-00760 (AWT), U.S. District Court - District of Connecticut. Testimony at Trial on behalf of the Defendant in December of 2014.

Fitzgerald/Thornton v. American Family Mutual, Civil Action No. 6:14-cv-00497, U.S. District Court - District of Oregon on 12-9-2014. Report and Testimony at Deposition on behalf of the Defendant in December 2014.

**Expert Services: Consultation, Expert Opinion and/or Expert Report:**

Debra D. Piper v. USAA Casualty Insurance Company, Civil Action File No. 1:20-CV-03515-AT, US District Court for the Northern District of Georgia Atlanta Division. Report on behalf of the Defendant in February 2021.

Hansen et al v. Country Mutual Insurance Company, Civil Action No. 1:2018cv00244, US District Court for the Northern District of Illinois. Report on behalf of the Plaintiff in July 2020. Supplemental Report in December 2020.

James McClain and Donna McClain v. Lennar Corporation d/b/a Lennar Homes USA, CalAtlantic Group, Inc., and Cheetah Cub Group Corp. American Arbitration Association Case Number: 02-19-0004-1515, Arbitrator: Ivan Sarkissian. Report on behalf of the Respondent in September 2020.

Goff 656621 B.C. Ltd. v Davivid Moerman Painting Ltd. et al, File Number VLC-S-S-174526, Vancouver Law Courts - Supreme Court of British Columbia. Report on behalf of the Defendant in March 2020.

Citizens Bank NA vs Jonnie L Bond, Case No. 17 CIV 0535, Court of Common Pleas, Medina County, Ohio. Report on behalf of the Plaintiff in August 2019.

Massachusetts Bay Insurance Company a/s/o Travis Mclavy Llc and the Hanover American Insurance Company a/s/o Mclavy Mens Clothiers Vs Dearmans Number 1 LLC, File Number 655846, 19th Judicial District Court for the Parish of East Baton Rouge, State of Louisiana Expert Report on behalf of the defense in July of 2019.

Wing Tip Communications, Inc vs Commercial Fire Protection, Case Number C17-01297, Superior Court Of The State Of California County Of Contra Costa. Consulting Expert on behalf of the defense in July 2019.

California PG&E wildfires. Consulting expert on behalf of plaintiff attorneys Mauro, Archer & Associates in December of 2017.

Jeongwan Lee, et al., v. AvalonBay et al., Civil Action BER-L-3657-15, Bergen County, Superior Court of New Jersey. Consulting Expert on behalf of plaintiffs in September of 2017.

James W. Baker v. U.S. Property Preservation Services, LLC, Civil Action File No. 13SC0174ADM, State Court of Cherokee County, GA. Expert Report on behalf of the defense in October of 2016.

Jonnie L. Bond and Ari Jolovitz v. Freedom Property Inspections, et al., Case No. 15 CIV 0325, Court of Common Pleas, Medina County, Ohio. Consulting Expert for the defense in August of 2016.

Barry and Marcia Seinfeld v Chubb Lloyd's Insurance Company of Texas, Civil Action No. 3:15-cv-1181-B, U.S. District Court for the Northern District of Texas. Expert Report on behalf of the defense in February 2016.

Robinson Greer, LLC v. Auto Owners Insurance Company, Civil Action No. 5:15-cv-00047-RLV-DCK, U.S. District Court for the Western District of North Carolina. Consulting Expert for the defense in December 2015.

Taladay et al v. Metropolitan Group Property and Casualty Insurance Company Case No. 2:14-cv-01290, U.S. District Court for the Western District of Washington. Consulting Expert for the defense in December 2015. As I was not properly disclosed in a timely manner, by Order dated January 13, 2016, the Court granted plaintiffs' unopposed motion to exclude me from testifying as an expert witness in this matter.

State Farm Fire and Casualty Company, v. Brennar Home Services, LLC dba Mountain View fireplaces; Adair Plumbing LLC; Thorobred Framing, Inc.; John Does and Jane Does I-V; Black & White Corporations I-V, Case No. CV2013-015789, AZ Superior Court in the County of Maricopa. Expert Report on behalf of the defense in October of 2015.

Federal Insurance Company, as Subrogee of John and Suzann Murphy vs Bay State Construction Corporation vs Dubose Associates, Inc. Architects and Zanella Plumbing & Heating, Inc., Civil Action No. 11-0649, Rhode Island - Washington Superior Court. Consulting Expert on behalf of the Plaintiff in September 2015.

Dan and Elizabeth Grant v. Universal Property and Casualty Company and Travelers Home and Marine Insurance Company, Case No. 11-2013-CA-002730, Collier County, FL State Court. Consulting Expert on behalf of the defense in August of 2015.

Michael and Janet Ranney vs The Cincinnati Insurance Company, Civil Action No. 15 CV 185820, Lorain County, OH Court of Common Pleas. Consulting Expert on behalf of defense in July of 2015.

#### **Testimony at Deposition as Witness as to Facts:**

Jeff & Lori Kelley v. Gibson Electric LLC, Case No. 2014-CV-000178, Fourth Judicial District Court of Franklin County, Kansas. Testimony as to Facts at Deposition in December 2015.

Lains v. American Family Mutual Civil Action No. C14-cv-01982-JCC, U.S. District Court - Western District of Washington at Seattle. Testimony as to Facts at Deposition in December 2015.

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Federal Insurance Company, as Subrogee of John and Suzann Murphy v. Bay State Construction Corporation vs Dubose Associates, Inc. Architects and Zanella Plumbing & Heating, Inc., Civil Action No. 11-0649, Rhode Island - Washington Superior Court. Note: Federal Insurance Company aka Chubb. Testimony as to Facts at Deposition in June 2014.

Kifer v. American Family Mutual Insurance, Civil Action No. 3:13-cv-06085-RJB, U.S. District Court - Western District of Washington. Testimony as to Facts at Deposition in December 2014.

Fitzgerald/Thornton v. American Family Mutual, Civil Action No. 6:14-cv-00497, U.S. District Court - District of Oregon. Testimony as to Facts at Deposition in December 2014.

### Services in Appraisal:

Robinson Greer, LLC v. Auto Owners Insurance Company, Civil Action No. 5:15-cv-00047-RLV-DCK, U.S. District Court for the Western District of North Carolina. Appointed as Insurer's Appraiser in December 2015.

Olinger v Grange/Trustguard Insurance, Clm. No. 1817473. Acting as Insurer's Appraiser, concluded in November of 2015.

Wethern v Auto Owners, Clm. 300-0007165-2015. Acting as Insurer's consultant in November 2015.

Toby v State Auto, Clm. No. PR-033605. Acting as Insurer's Appraiser, concluded in October of 2015.

Michael and Janet Ranney vs The Cincinnati Insurance Company, Civil Action No. 15 CV 185820, Lorain County, OH Court of Common Pleas. Acting as Insurer's Appraiser in June of 2015.

Fitzgerald/Thornton v. American Family Mutual, Civil Action No. 6:14-cv-00497, U.S. District Court - District of Oregon on 12-9-2014. Acting as Insurer's Appraiser in June of 2015.