

Exhibit B

101 South Queen Street
Martinsburg, West Virginia 25401

7000 Hampton Center
Morgantown, West Virginia 26505

501 Avery Street
Parkersburg, West Virginia 26101



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June 20, 2017

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Southpointe Town Center
1800 Main Street, Suite 200
Canonsburg, Pennsylvania 15317

1217 Chapline Street
Wheeling, West Virginia 26003

480 West Jubal Early Drive, Suite 130
Winchester, Virginia 22601

JUN 22 2017
The Masters Law Firm Inc
Charleston WV 25301

Joshua A. Johnson
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E-Mail Address:
jjohnson@bowlesrice.com

Marvin W. Masters, Esq.
Kim Parmer, Esq.
The Masters Law Firm Inc
181 Summers Street
Charleston, West Virginia 25301

Re: Old White Charities, Inc. v. Bankers Insurance, LLC
Civil Action No. 5:17-cv-01375

Dear Mr. Masters:

Enclosed please find *Defendant Bankers Insurance, LLC's Rule 26(a)(1) Initial Disclosures* regarding the above-referenced matter. Please do not hesitate to contact me should you have any questions.

Very truly yours,

Joshua A. Johnson

JAJ/cjg
Enclosure

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JUN 22 2017

The Masters Law Firm, PC
Charleston WV 25301

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
BECKLEY DIVISION**

OLD WHITE CHARITIES, INC.,

Plaintiff,

Case No. 5:17-cv-01375

v.

BANKERS INSURANCE, LLC,

Defendant.

**DEFENDANT BANKERS INSURANCE, LLC'S
RULE 26(a)(1) INITIAL DISCLOSURES**

Defendant Bankers Insurance, LLC ("Bankers"), by counsel, and pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, makes the following Initial Disclosures. These disclosures are based on presently known information which is reasonably available. Bankers reserves its right to amend and/or supplement its Initial Disclosures as needed.

A. Individuals Likely to have Discoverable Information, Federal Rule of Civil Procedure 26(a)(1)(A)(i)

1. P. Marshall Fleming, Bankers Insurance, LLC
2. Walter E. Hayes, Bankers Insurance, LLC
3. Paul Fleming, II, Bankers Insurance, LLC
4. Monte Ortel, Greenbrier Classic Executive Tournament Director
5. Jim Sweetwood, Greenbrier Classic Tournament Coordinator
6. Charlie Henthorn, Director of Finance at the Greenbrier
7. James C. Justice, II
8. Michael Connatser, All Risks, Ltd.
9. Andrew Haynes, All Risks, Ltd.

10. Teresa Walker, All Risks, Ltd.

11. Robin Lang, HCC Specialty

12. Any individual identified by any party in *Talbot 2002 Underwriting Capital LTD, et al. v. Old White Charities, Inc. et al.*, United States District Court, Southern District of West Virginia Case No. 5:15-cv-12542.

B. Description of Documents, Federal Rule of Civil Procedure 26(a)(1)(A)(ii)

Bankers discloses the following descriptions of categories of documents that may support its claims and/or defenses:

1. Records related to the policy that is the subject of this Action (the “Policy”), including but not limited to records and correspondence concerning the application;

2. Correspondence and documentation of communications between the parties, their employees, and/or their counsel discussing the Policy, the Claims, and the relationships/obligations of parties to this litigation;

3. Agreements/contracts between any of the parties to this litigation and records and correspondence related to said agreements/contracts;

4. Any other documents in Bankers’ Account Management System related to the Policy and Claims; and,

5. Any document produced by any party in *Talbot 2002 Underwriting Capital LTD, et al. v. Old White Charities, Inc. et al.*, United States District Court, Southern District of West Virginia Case No. 5:15-cv-12542.

C. Damages, Federal Rule of Civil Procedure 26(a)(1)(A)(iii)

Bankers has not filed any claim seeking damages at this time.

D. Insurance, Federal Rule of Civil Procedure 26(a)(1)(A)(iv)

Westport Insurance Corporation, Policy Number WED4VA005792309
Policy Period: January 1, 2015 – January 1, 2016
Insured: Bankers Insurance, LLC

Respectfully submitted,

BANKERS INSURANCE, LLC
By Counsel

/s/ Stuart A. McMillan
Stuart A. McMillan, Esq. (WVBN 6352)
Joshua A. Johnson, Esq. (WVBN 12247)
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**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
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OLD WHITE CHARITIES, INC.,

Plaintiff,

Case No. 5:17-cv-01375

v.

BANKERS INSURANCE, LLC,

Defendant.

CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of June, 2017, the foregoing **Certificate of Service** was electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record, and that I have caused copies of **Defendant Bankers Insurance, LLC's Rule 26(a)(1) Initial Disclosures** to be served upon the following by placing the same in the regular United States Mail, postage prepaid, addressed as follows:

Marvin W. Masters, Esq.
Kim Parmer, Esq.
The Masters Law Firm lc
181 Summers Street
Charleston, WV 25301
Counsel for Plaintiff Old White Charities, Inc.

/s/ Stuart A. McMillan
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