



MDL NOS. 13-0123 & 13-0130

§ IN THE DISTRICT COURT OF  
§  
§  
IN RE MARCH 29, 2012 AND APRIL § HIDALGO COUNTY, TEXAS  
20, 2012 HAIL STORM LITIGATION §  
§  
§  
§  
§ 206TH JUDICIAL DISTRICT

---

**RECOMMENDATION NO. 11 OF SPECIAL MASTER REGARDING PLAINTIFFS' MOTION TO COMPEL DEFENDANT NATIONAL LLOYDS INSURANCE COMPANY TO SERVE SUPPLEMENTAL ANSWERS TO INSTITUTIONAL INTERROGATORIES AND PRODUCE RESPONSIVE DOCUMENTS TO INSTITUTIONAL REQUESTS FOR PRODUCTION, MOTION TO STRIKE DEFENDANT'S OBJECTIONS, AND MOTION FOR COSTS**

---

Pursuant to my appointment as Special Master in the above-referenced MDL proceeding, I considered *Plaintiffs' Motion to Compel Defendant National Lloyds Insurance Company to Serve Supplemental Answers to Institutional Interrogatories and Produce Responsive Documents to Institutional Requests for Production, Motion to Strike Defendant's Objections, and Motion for Costs* and Defendant's responses thereto, as well as the arguments of counsel and the evidence presented at a July 1, 2014 conference/hearing conducted with the parties' counsel. In addition, as Special Master, I took note of agreements announced on the record by the parties relating to different aspects of the motions at issue. I hereby make the following recommendations regarding Plaintiffs' present motion:

Defendants' objections made pursuant to the Texas Rules of Civil Procedure 196.4 are hereby overruled. Based on the Special Master's Recommendation, Defendants have agreed and are hereby ordered to supplement on or before August 15, 2014.

Signed this \_\_\_\_\_ day of \_\_\_\_\_, 2014,

  
\_\_\_\_\_  
Roberto L. Ramirez  
Special Master

**AGREED :**

**THE MOSTYN LAW FIRM**

*/s/ Amber Anderson Mostyn*

Amber Anderson Mostyn

State Bar No. 90001704

Molly K. Bowen

State Bar No. 24069898

3810 W. Alabama Street

Houston, Texas 77027

(713) 861-6616 (Office)

(713) 861-8084 (Facsimile)

**COUNSEL FOR THE PLAINTIFFS**

**DOYEN SEBESTA LTD., LLP**

*/s/ Scot Doyen w/permission*

Scot Doyen

450 Gears Rd., Suite 350

Houston, Texas 77067

713.580.8900 (Phone)

713.580.8910 (Facsimile)

**COUNSEL FOR THE DEFENDANTS**