

The Honorable Marsha J. Pechman

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UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

AYANNA ROSENBERG, individually, and on
behalf of all those similarly situated,

Plaintiff,

v.

CCS COMMERCIAL, L.L.C. (d/b/a Credit
Collection Services Commercial), and
PROGRESSIVE DIRECT INSURANCE
COMPANY,

Defendants.

NO. 2:17-CV-00476-MJP

ORDER GRANTING IN PART LCR37
SUBMISSION ON PLAINTIFF'S
MOTION TO COMPEL

This matter having come before the undersigned judge of the above-entitled Court on
LCR37 Joint Motion Submission on Plaintiff's Motion to Compel, having reviewed Plaintiff's
Submission (Dkt. No. 33), and being fully advised, now therefore:

IT IS ORDERED that Defendant's general objections are STRICKEN, and Defendant is
ordered to supplement its responses.

As to **Interrogatory No. 11**, It Is Hereby Ordered:

*Defendant must answer regarding any notices or written policies for when collection
notices are to be used and what the notices should contain.*

ORDER GRANTING IN PART LCR37 SUBMISSION ON
PLAINTIFF'S MOTION TO COMPEL (2:17-CV-00476-
MJP) - 1

1 As to **Interrogatory No. 12, It Is Hereby Ordered:**

2 *Defendant will further supplement its prior responses to supply the case number, venue*
3 *and case name of any Washington-filed suits (other than Panag and Stevens) brought against*
4 *the named CCS party in this suit, within the four years prior to this litigation. These*
5 *supplemental responses must be provided within seven (7) days of this order.*

6
7 As to **Interrogatory No. 13, It Is Hereby Ordered:**

8 *Defendant will supply the names of all insurance companies doing business in*
9 *Washington that, over the four years preceding this lawsuit, have engaged CCS or been*
10 *assisted by CCS in attempting to collect sums claims to be owed as a result of the respective*
11 *insurance company's claimed subrogated interests.*

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13 As to **Request for Production No. 3, It Is Hereby Ordered:**

14 *Defendant will turn over a complete file of all communications in all forms with*
15 *Plaintiff.*

16
17 As to **Request for Production No. 4, It Is Hereby Ordered:**

18 *Defendant will produce all documents concerning or relating to any efforts by*
19 *Defendant, or anyone acting on its behalf, to collect any sum of money from Plaintiff for any*
20 *reason.*

21
22 As to **Request for Production No. 10, It Is Hereby Ordered:**

23 *Defendant will produce all the templates for the form letters that it uses, or has used in*
24 *the four years preceding the initiation of this suit, in connection with pursuit of the collection*
25 *(in the State of Washington or in connection with insureds from the State of Washington) of*
26 *amounts claimed to be owed as a result of an insurer's subrogated interests.*

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2 As to **Request for Production No. 18**, It Is Hereby Ordered:

3 *This request is DENIED in light of Plaintiff's offer to limit the scope of its requests to*
4 *the templates of the form letters used by Defendant (as described in the ruling on Request for*
5 *Production No. 10).*

6
7 The clerk is directed to provide copies of this order to all counsel.

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9 Dated: January 19, 2018

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13 Marsha J. Pechman
14 United States District Judge

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on January 19, 2018, I electronically filed the foregoing with the
3 Clerk of the Court using the CM/ECF system which will send notification of such filing to all
4 counsel of record

5 DATED at Seattle, Washington, this 19th day of January, 2018.

6
7 /s/ Chase C. Alvord

8 Chase C. Alvord, WSBA #26080

9 calvord@tousley.com

Tousley Brain Stephens PLLC

Attorneys for Plaintiff

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