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9 *Attorney for Movant-Intervenor United*
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11 IN THE UNITED STATES DISTRICT COURT
12 FOR THE DISTRICT OF ARIZONA

13 Karen Cosgrove, a single person,
14 Plaintiff,

15 v.

16 National Fire & Marine Insurance
17 Company, a foreign insurer,
18 Defendant.

No. CV-14-02229-PHX-HRH

**DECLARATION OF DANIEL
WADE IN SUPPORT OF UNITED
POLICYHOLDERS' MOTION TO
INTERVENE**

19 1. I, Daniel Wade, am a staff attorney for United Policyholders. I have been
20 employed by United Policyholders since January 2014. I am a member in good standing
21 of the bars of California and Illinois. I have personal knowledge of the facts set forth in
22 this declaration.

23 2. United Policyholders is a national non-profit 501(c)(3) consumer advocacy
24 group based in San Francisco. United Policyholders was founded in 1991 after an urban
25 wildfire destroyed 3,000 homes in Northern California and left residents struggling with
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1 serious and unexpected gaps in their insurance coverage and an often-adversarial claims
2 process. United Policyholders' mission is to help level the playing field between insurers
3 and insureds by providing trustworthy and useful information and by being an effective
4 voice for consumers of all types of insurance in all fifty states. United Policyholders is
5 funded by individual and business donations and grants from foundations and
6 government. United Policyholders does not sell insurance or accept money from
7 insurance companies.
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10 3. United Policyholders focuses its work on three programs. First, the
11 *Roadmap to Recovery* program provides long-term guidance and support to people,
12 businesses, and communities after disasters, accidents, illnesses, and other events where
13 the full and timely payment of insurance benefits is critically important. For example,
14 United Policyholders has recently provided extensive advice and libraries of resources to
15 victims of hurricanes Harvey and Irma and the Northern California Wildfires. *See, e.g.*,
16 <http://www.uphelp.org/blog/hurricane-harvey-insurance-help>;
17 <http://uphelp.org/hurricane-irma-help-library>; [http://uphelp.org/blog/north-bay-fires-](http://uphelp.org/blog/north-bay-fires-insurance-claim-help)
18 [insurance-claim-help](http://uphelp.org/blog/north-bay-fires-insurance-claim-help). United Policyholders also has helped Arizonans since the 2003
19 Aspen Fire.
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22 4. Second, United Policyholders' *Roadmap to Preparedness* is an outreach
23 and education program that helps renters, homeowners, and small business owners to take
24 specific steps to protect their assets and build financial safety nets for disaster resiliency.
25 For example, United Policyholders provides plain-talk consumer-oriented financial
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1 guidance to help consumers obtain the right amount and type of insurance. *See, e.g.*,
2 <http://www.uphelp.org/resources/buying-tips>.

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4 5. Third, through its *Advocacy and Action* program, United Policyholders
5 stands up for insurance consumers by fighting to strengthen and defend the laws that
6 preserve insurance promises and protect policyholder rights. These efforts include
7 working with elected officials, other non-profit organizations, faith-based organizations,
8 insurance regulatory agencies, insurance producers, insurance trade associations, business
9 groups, and the media—and also filing briefs in court that represent the interests of
10 policyholders. To that end, UP’s Executive Director is serving her seventh elected term
11 as a consumer representative at the National Association of Insurance Commissioners
12 and is an advisor to the Federal Insurance Office.

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15 6. United Policyholders has assisted courts by filing *amicus curiae* briefs in
16 more than 450 cases, including in many Arizona cases. *See, e.g.*,
17 [http://uphelp.org/resources/amicus-](http://uphelp.org/resources/amicus-briefs?field_amicusstate_value=arizona&field_amicusissue_value=)
18 [briefs?field_amicusstate_value=arizona&field_amicusissue_value=](http://uphelp.org/resources/amicus-briefs?field_amicusstate_value=arizona&field_amicusissue_value=).

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20 7. United Policyholders also has intervened in cases—including in the U.S.
21 District Court for the District of Arizona—to unseal court documents on behalf of the
22 public interest. For example, attached at Exhibit 1 is a true and correct copy of an order
23 granting United Policyholders’ motion to intervene in *McKendry v. General American*
24 *Life Insurance Co.*, No. 96-CV-0754-PHX-PGR, Doc. 264 (D. Ariz. Jan. 29, 2002), for
25 the purpose of seeking to unseal certain documents.
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8. Neither I nor any other employee of United Policyholders knew that this Court had sealed and vacated its partial summary judgment decision and related minute order until more than a month after the Court dismissed the action in its entirety and closed the case on May 10, 2017.

DATED this 2nd day of November, 2017.

By: 
Daniel Wade