FALL 2016

atissue

A STONE | DEAN PUBLICATION

Connecting you to trending and relevant legal developments in California

inside this issue:

Q&A with
Leslie Blozan, Esq.

Leslie Blozan is one of our more experienced attorneys at Stone | Dean. She has litigated insurance defense matters for her entire career. She is well versed in insurance coverage disputes and insurance broker errors and omissions claims. Get to know Leslie with these questions and answers!

How would you describe your style of practicing law? Calm, firm and prepared.

How is your style different from other attorneys? Unless provoked, I am cooperative and willing to work toward a reasonable resolution of all disputes. Games and displays of ego and temper are unnecessary. They don't yield any true advantage and often cost clients in extra fees and poor outcomes. However, sometimes the only option is a litigation war, in which case I oblige.

If you could try any case in history, which would it be and why? The People vs. Charles Manson, et al. I remember the horror of the murders from my childhood, as well as the circus surrounding the trial. When in law school, I read prosecutor Vince Bugliosi's excellent account, Helter Skelter. It was one of the most frightening books I've ever read, all the more so for being true.

Why did you choose to practice elder law? I handled a tragic case involving professionals who financially abused an elderly, childless widow. At the same time, my parents were suffering from dementia. The experience showed the huge risks of financial abuse seniors face on a daily basis and led me to learn ways to help protect them.

How would your friends and family describe you? Rational, reasonable, occasionally stubborn but with a subtle humor, sarcastic wit and a song for every occasion.

What made you decide to enter law school? I was a 20 year old college graduate with a Political Science degree and office skills. My future looked bleak and an advanced degree seemed the only sensible option. I thought law would be interesting, not too hard, and it did not require a thesis. I had no idea what I was getting myself into.

What advice would you give to your younger self about entering the legal industry? First, I'd congratulate myself for making a good career choice at a young age. After that, I'd say: be bolder, explore, take more career risks. Looking back, I think I would have enjoyed appellate work, and regret not having done more of it.

How do you unwind after a trial? A cocktail with the trial team, maybe a nice dinner, then back to work.

You're an avid reader, what genre do you enjoy reading the most, and why? I enjoy historical fiction, often involving mysteries or detectives. It is great escapist fare. For true literature, I enjoy American and English classics, from the 1800s to the current date. In a well-crafted novel an entire world is created in words. Wuthering Heights, A Prayer for Owen Meaney and The Dublin Murder Squad series by Tana French come to mind as literary favorites.

What is the best part of working for Stone | Dean? We have a great blend of personalities and strengths. I've seen the inside workings of many firms, where there is endless competition among co-workers. At SD, we are a team, always offering unconditional mutual support.

What would you say is your main motivation as an attorney? There are several: the intellectual challenge; the competition against the opposition; the creativity in handling litigation; and exposure to so many interesting people, places and random bits of knowledge.

If you could go anywhere in the world to visit, where would it be? It is too hard to pick any single place when there are so many sights to see. The top of my bucket list includes Iceland, where I've never been, and Scotland, where I have.

If you had to choose the most interesting case you had ever worked on, which would it be and why? It is tough to choose, there have been so many. I had the privilege of being involved in some of the DES market share cases. They involved a new theory of law. Children of women who took DES sued drug manufacturers for serious medical conditions allegedly caused by in-utero exposure to the drug. Since 20 years or more had passed since exposure, it was impossible to identify the manufacturer of the drug taken by plaintiffs' mothers. Instead, market share liability was imposed on the manufacturers, based on the company market share at a particular time, at a particular location.

What do you like most about being an attorney? The legal practice is a continuing intellectual challenge. You rarely see the same situation twice. The law is dynamic, with constant changes. Those changes, plus specific fact patterns make every case unique. That, and winning.

Are you more introverted or extroverted? Is it better to be one or the other as a lawyer? I tend toward the introverted, but am not at all shy. Extroversion is great in litigation. Introversion works well, too. I particularly enjoy the strategy of discovery and pre-trial motions, where considered analysis and intense preparation are required. Introverts are good at setting the stage, as well as acting on it.

What do you like to do when you're not working? I like to escape. That often involves books, but also involves running, martial arts, kayaking and travel.

If you weren't working in law, which career would you choose? I wanted to be an art restorer or museum curator and was even accepted into a Museum Arts program. I've always had a pull between the artistic and the intellectual.

Learn more about Leslie on our website at: http://stonedeanlaw.com/our-people/attorneys/leslie-a-blozan

Calling All Employers: Don't Be This Guy!

By Robyn M. McKibbin, Esq.

Stone | Dean recently obtained a six-figure arbitration award on behalf of a wrongfully terminated employee, plus attorney's fees and costs. Stone | Dean advises employers on how to avoid employment disputes and aggressively defends them if litigation cannot be avoided. This case was a textbook example of how employers should not behave.

Our client ("Jane") was hired for an AP/AR position and general HR duties. Her immediate supervisor was the company owner (to protect the "guilty" we will call him "Joe"). A second supervisor was the company's outside accountant (CPA). Jane was classified by Joe as exempt but spent the majority of her time running errands for Joe, i.e., picking up prescriptions for Joe and his mother, washing Joe's car, paying allowance and bills for Joe's daughters. Jane did not have any issue performing Executive Assistant tasks. However, a considerable amount of overtime hours was required to complete such tasks, which exacerbated Jane's multiple sclerosis. But Joe did not like Jane leaving work at 5:30 p.m. to attend doctor's appointment to treat her MS. His temper tantrums caused her to stop treating during the week.

Jane's HR duties were essentially limited to creating employee files. She did not create policies or procedures, hire or fire employees, or set pay rates. Joe created all of the office policies and procedures most, if not all of which were unlawful. Throughout her employment, Jane raised concerns about the company's policies and practices and was repeatedly told not to "rock the boat" or "go against the grain." Her complaints about wage and hour violations and health and safety issues were met with open resentment. Joe wanted things done his way and did not like being challenged. He often barked that she "works" for him; not the other way around.

In addition to the arbitrator ruling Jane was misclassified entitling Jane to overtime wages and penalties, Jane also prevailed on her sexual harassment/hostile work environment claim. Jane was "tasked" with reviewing and organizing Joe's personal and business email accounts. That alone would not be problematic, but the accounts were riddled with pornographic material and Joe knew it when he instructed Jane to "archive" them. Joe emphatically testified during arbitration that Jane was instructed to save the porn and not delete it.

Joe also made numerous inappropriate comments in the workplace. During a job interview, Joe asked the candidate whether she would change her name. When she inquired "Why?" he replied, "Because it sounds like a terrorist's name." The applicant's name was "Isis." Further, when Jane asked Joe how the interview went, Joe replied that she was not a qualified candidate because she was black.

Joe also said things like "Mexicans don't know anything" and "cannot speak English"; he made anti-Semitic comments and several "jokes" about President Obama based on his race. Notably, Jane is Mexican. Her children's father and former in-laws are Jewish and her brother-in-law is black. Joe's "jokes" were found subjectively and objectively offensive.

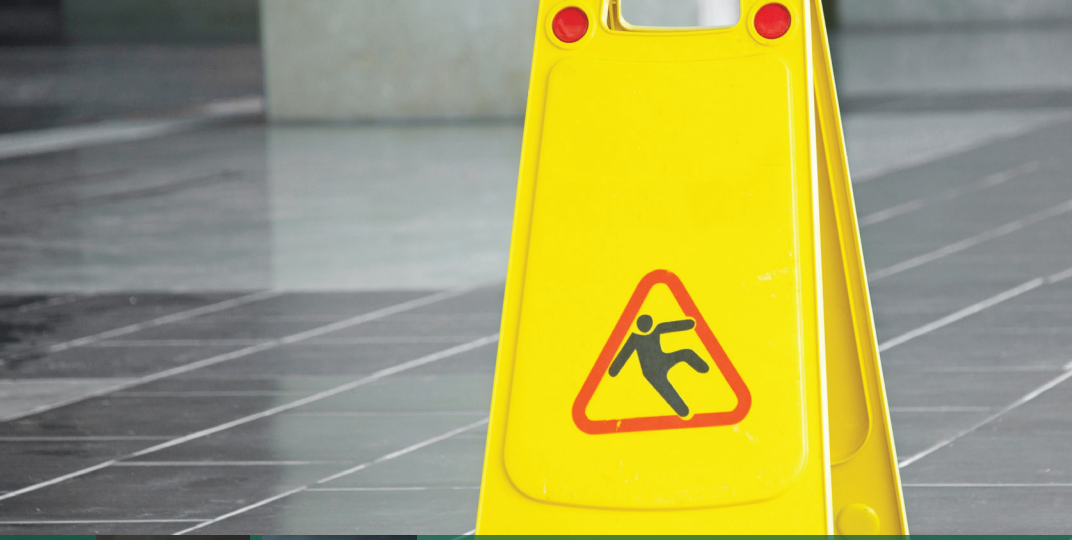
Jane spoke to the CPA about Joe's inappropriate comments in the workplace. The CPA told Jane that she had counselled Joe to no avail.

Jane also proved that she was wrongfully terminated. Joe terminated Jane after about six (6) months of employment claiming they had "communication problems." At arbitration, Joe alleged that Jane was terminated because of performance problems. However, no performance issues were documented. Further, Jane had a 90-day performance review and was given a raise. Joe then argued that she was fired because she made defamatory statements about him to one of his clients. Neither argument was credible.

The evidence showed that after her termination, Joe asked CPA whether she thought the company may have exposure for terminating Jane. CPA thought there was some risk. In an effort to try to intimidate Jane and dissuade her from pursuing any claim against the company, Joe instructed his attorney to send a cease and desist letter. Jane was accused of disclosing confidential financial information to other employees and "perhaps also to nonemployees." No specific information was referenced. No employee or nonemployee was identified. At arbitration, the company did not present any evidence of the purported disclosures. Joe also failed to articulate any information that was allegedly leaked.

Joe did one thing right in the lawsuit. He agreed to participate in an early mediation before costs and fees began to mount. Unfortunately, Joe did not participate in good faith. If he had, he could have settled the matter for a low five-figure number. Instead, he's out tens of thousands of dollars in attorney's fees, arbitration costs and fees, and now has to satisfy Jane's high six-figure judgment.

The "takeaways" should be obvious. If not, you'd best call Stone | Dean's Employment Law Practice Group immediately!



Case in Focus:
The Second Time's the Charm

By Gregory Stone, Esq. and Angela Jones, Esq.

In June, Gregory Stone and Angela Jones earned a hard fought and longshot defense verdict on a slip and fall case involving one (1) of Stone | Dean's grocery store clients. The matter was first tried to a jury in the traditionally conservative venue of Van Nuys in January 2016.

After several hours of deliberation, the Van Nuys jury was unable to reach a verdict on the first question whether the defendant was negligent. The jury poll was seven (7) in favor of the defense and five (5) in favor of the plaintiff. In California, civil trials require a minimum of nine (9) out of 12 jurors to reach a verdict. Due the deadlock, the judge declared a "mistrial."

For the re-trial, the case was assigned to downtown Los Angeles (Central District), known as a far more liberal venue for a June 2016 trial date.

In an effort to settle the matter, defendants proposed a six-figure settlement; however, plaintiff and his attorneys showed very little interest in a resolution short of a full blown jury trial. Plaintiff and his attorneys were very confident and convinced being transferred downtown would certainly result in a large, favorable seven-figure verdict and therefore opted for the re-trial in the more liberal venue rather than reaching an out of court settlement.

Legal Standard

California law does not hold a property owner automatically liable because someone gets injured on its premises. In order to prove liability, a plaintiff must show the owner either knew of the condition that caused the injury and did nothing about it or the condition existed for an unreasonable length of time such that defendant should have known about it. If the defendant does not regularly inspect its premises and document those inspections, it is legally presumed the condition was on the ground too long.

Facts of the Case

The slip and fall occurred in the supermarket's bathroom around 8:55 p.m. The case was problematic as the plaintiff was truly the only person who knew what happened. While the store had video surveillance that captured the plaintiff entering the bathroom, obviously there was no video inside the bathroom. Plaintiff was observed exiting the restroom after about one (1) minute, limping and appearing to be in pain. His clothes were drenched with water and both his spouse and the store manager went into the restroom and photographed a substantial amount of water on the restroom floor and on plaintiff's person.

The manager of the store testified to the store's inspection policy including the bathroom. The last documented inspection of the bathroom took place at 7:45 p.m.; however, according to the store manager, the log was inadvertently discarded. Plaintiff argued spoliation of evidence and that the store failed to inspect its premises as required by law and by its own policy requiring hourly inspections. Additionally, no store employees could be found who could testify to the last time the bathroom was mopped before plaintiff's purported slip and fall.

Even more problematic, the store video showed the last person in the restroom prior to the incident was a store employee, who exited a mere two (2) minutes before plaintiff entered. As such plaintiff argued the store employee either: (1) created this condition, or (2) ignored it and failed to remedy it. Either scenario would constitute a violation of store policy and procedures.

As a result of the fall, plaintiff alleged significant and life changing injuries including surgery for three (3) large disc herniations. Additionally, at the time of the incident, plaintiff was only qualified to perform physical labor and was only 25 years old. Thereafter, he was relegated to a life of sedentary work. His medical bills exceeded $250,000; loss of earnings were projected over $380,000; and lifelong pain and suffering totaled in the millions. In closing argument, plaintiff's counsel asked the jury to award $5,000,000.

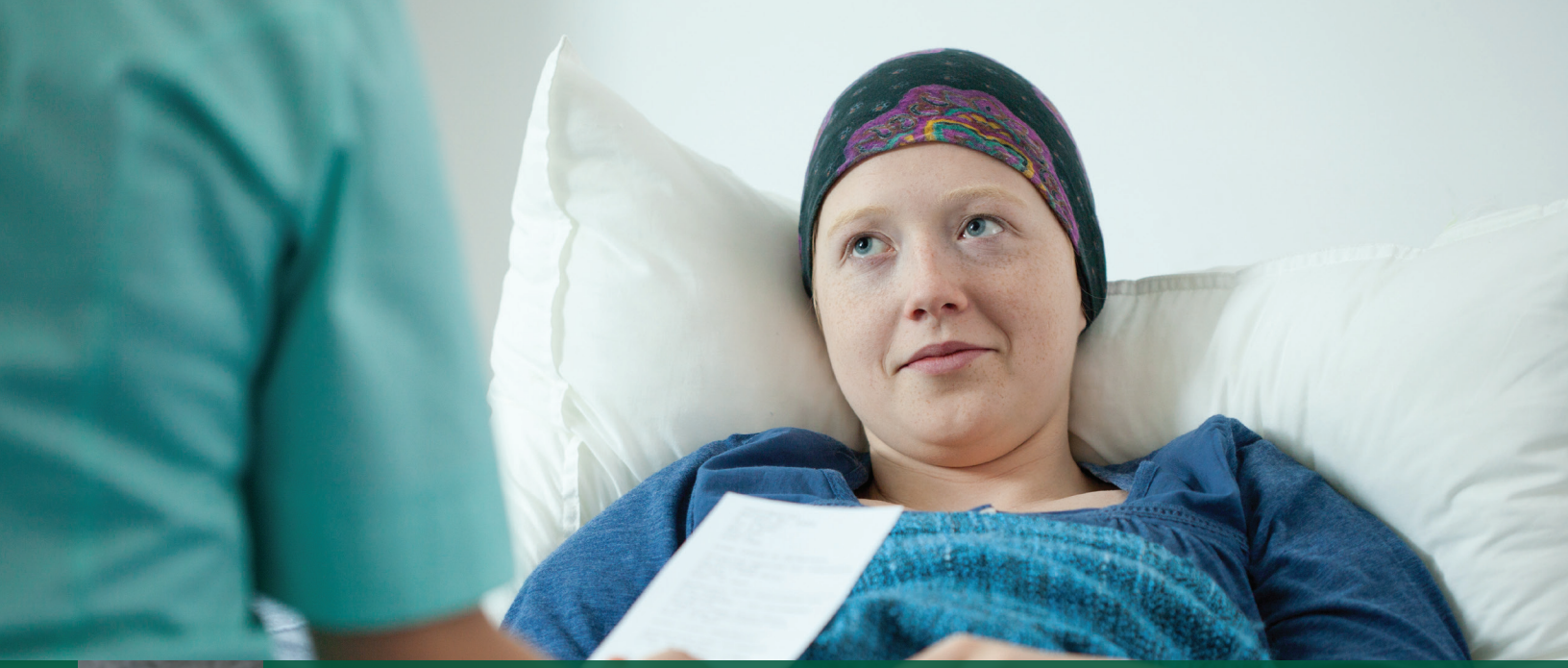
To support his case, plaintiff utilized four (4) expert witnesses: an economist; a vocational rehabilitationist; plaintiff's surgeon; and an engineer who testified as to the adequacy of the store's policies and procedures. The defense rebutted with two (2) experts of its own: an orthopedic surgeon and a biomechanical engineer.

The Verdict

The trial lasted eight (8) court days but after only two (2) hours of deliberations the jury returned a verdict in favor of the defendant, finding no negligence on its part. The defendant was awarded its costs, including expert fees.

This was a tough liability case, especially in the downtown venue known for being plaintiff-friendly. It validates Greg's long-time belief that his home town of Los Angeles has fair and well-reasoned jurors when presented with a well-reasoned defense.

This trial verdict was featured as the "Top Defense Verdict" in the Daily Journal.



Is This Really "The End"?

The New California End of Life Option Act and What It Means — Part I

By Leslie Blozan, Esq.

On June 9, 2016, the California End of Life Option Act became effective. The new law, based on Oregon's Death with Dignity Act, allows for competent adults with terminal medical conditions to actively terminate their own life, with a doctor's assistance.

In 2006, the U.S. Supreme Court upheld the 1997 Oregon law that law allows doctors to prescribe controlled substances to terminally ill patients who wish to die. After that ruling, four (4) other states followed with similar legislation and one (1) state allows assisted suicide based on court rulings. Nineteen (19) states are currently considering right to die legislation. Another four (4) states have ambiguous laws that neither prohibit nor support the process.

Under the new law, competent California residents 18 years old or older may request aid-in-dying medication. To qualify for the medication, the patient must be capable of making and communicating healthcare decisions. They must be diagnosed with a terminal disease that will cause death within six (6) months. Once those conditions are met, the patient may consult a doctor willing to prescribe the medication.

A terminal patient must make two (2) verbal requests to their doctor, at least 15 days apart. Then, a written request is required. That request must be signed and witnessed by two (2), competent and qualified adults. *Health and Safety Code* section 443 contains the required form. The verbal and written requests can only be made by the person with the terminal condition. No conservators, health care agents or persons with power of attorney may make an end-of-life request, even if it is the true, expressed desire of the patient.

After the proper requests are made by a potentially qualified patient, the doctor must confirm the terminal diagnosis and prognosis. The prescribing doctor and one (1) additional doctor must then determine and agree that the patient is capable of making medical decisions. If there is any question, either doctor must require the patient submit to a psychological examination. The doctors must confirm the patient is acting independently, without coercion or undue influence of others.

Once the patient is approved by the doctors, the prescribing doctor presents alternatives other than medication to end the patient's life. These include palliative care, pain relief and comfort measures. The prescribing doctor then requests, but cannot require, that the patient notify their closest family of the prescription request. The prescribing doctor also must allow the patient the opportunity to withdraw the request for aid-in-dying medication before the prescription is written.

After the medication is prescribed and obtained by the patient, it must be self-administered. No assistance by any third party is allowed, including doctors. Well-meaning friends and family must not participate. Those who do may be criminally prosecuted.

The new law is already facing challenges. Doctors have sued to block implementation. Ethicists disagree whether the law should exist. Some hospitals have opted out of the process. Read the next "At Issue" for a discussion of the controversy and an update on challenges to the law.

998 Reasons to Serve an Offer to Compromise for the "Rhyme Impaired"

By Suzanne Feffer, Esq.

So you find yourself stuck in a claim
And no longer care who you
can blame
You just want out
But still have some doubt
If you can settle and limit the pain

Sometimes it's tough to call up
and chat
With the folks at the core of your spat
How can you ever start
And get to the heart
Of the dollars needed to call it a wrap

As the date for the trial grows near
A written offer to settle will make clear
Your settlement stance
Shorten the dance
And force the lawyer to pass on
your "cheer"

A Stat. Offer to Comp. can help move
Cases too expensive or hard to prove
The risk of ignoring the offer —
Increased post-judgment dollars
Those serving the offer will surely
approve

The Stat. Offer will help you
gain traction
In resolving cases to your satisfaction
Avoiding expert fees incurred
After the offer is served
May be just what's needed to settle
the action

Just as the limerick may have gotten your attention, a Statutory Offer to Compromise (California *Code of Civil Procedure*, section 998) may be just what is needed to get the other side's attention and open settlement discussions. First, a lawyer is ethically obligated to communicate an offer in writing (California Rules of Professional Conduct, rule 3-510). Second, there

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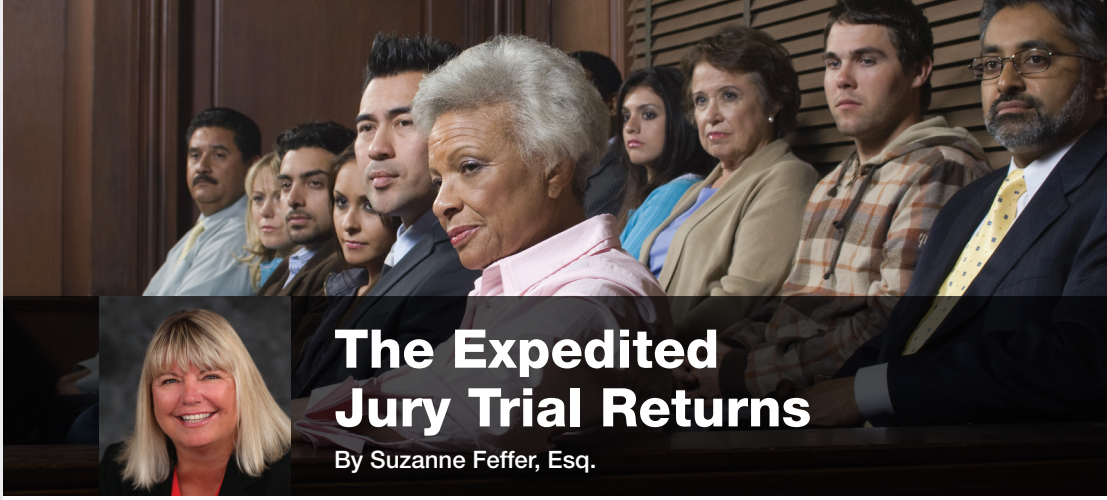

The Expedited Jury Trial Returns

By Suzanne Feffer, Esq.

Since 2011, civil court judges have encouraged expedited trials to help the ever-increasing delay imposed by budget cuts and closing courtrooms. At first, courts offered voluntary expedited trials. Both sides of a litigation could agree to an expedited jury trial which allowed each side three (3) hours to present their case and also provided expedited closure — no right to appeal. Very few parties and/or their counsel were interested and that was frustrating to the court administration who are under increasing pressure to find ways to eliminate the ever-increasing backlog of cases. As a result, the legislature got involved. Effective July 1, certain litigants do not have a choice if the case is considered a limited jurisdiction case. "Limited jurisdiction" cases are those lawsuits that involve a dispute valued at $25,000 or less. Limited jurisdiction cases tend to be much less complex and resource intensive for courts but comprise the vast majority of cases filed in California. For example, in 2014, there were 199,537 unlimited civil cases, and 554,858 limited jurisdiction cases filed statewide.

California Code of Civil Procedure section 630.20 became law this summer which takes away the choice by most litigants and deviates somewhat from the prior voluntary program. Each side must present their case within five (5) hours and that includes jury voir dire. Instead of twelve (12) jurors plus alternates, these expedited trials will consist of eight (8) jury members with one (1) alternate (unless the parties agree to fewer jurors) with four (4) preemptory challenges in most cases; a vote of six (6) jurors will be required for a verdict unless the parties agree otherwise. The most notable change from the prior voluntary plan is the fact that there now exists a right to appeal to the Appellate Division of the Superior Court. Despite the limitations imposed as to the presentation of the case, the jury is permitted to deliberate as long as is necessary.

Not all limited jurisdiction cases may be appropriate for an expedited jury trial and the Code allows for specific exemptions. For example, where the limited jurisdiction matter involves (1) a claim for punitive damages; (2) damages in excess of available insurance; (3) a defense provided under a reservation of rights; (4) a claim reportable to a governmental agency; (5) a claim of moral turpitude which may affect one's professional licensing; (6) a claim of intentional conduct; (7) a case that has been reclassified as an unlimited jurisdiction matter; and/or (8) a claim for attorney's fees other than as provided by *Civil Code* section 1717, any party may move to opt out of the mandatory expedited jury trial. Further, a court may exempt a case from an expedited jury trial if a party shows that one (1) or more of the parties requires more than five (5) hours to present or defend the action and the parties have been unable to agree how much additional time is required.

How can a case be tried to a jury in such a short period of time? The law already has several time-saving measures for limited jurisdiction cases. *Code of Civil Procedure* section 998 allows a party to present witness testimony (most notably experts) by a written statement signed under penalty of perjury. Evidence (including witnesses) must be disclosed by the parties ahead of time as mandated under *Code of Civil Procedure* section 96. Thus, while trial preparation costs may be reduced only modestly, the presentation to the jury will be substantially expedited.

The new law, as drafted, expressly anticipates that rules will be implemented by the Judicial Council to help lawyers navigate through the practical application of this new system. As practitioners we hope this new legislation will make litigation more efficient and less expensive for our clients.

Ask An Expert

Is California's new Lane-Splitting law (Assembly Bill 51) safer for riders or scary for drivers? We asked our team of legal experts for their thoughts, here's what they had to say:

Gregg Garfinkel, Esq.

Scary for drivers

Lane splitting is scary for drivers. How is the lane "split"? How much of the lane is each vehicle entitled to? As a defense attorney, I am concerned that liability can be imposed upon a driver who simply drifts too far within her/his own lane. I think that this situation screams for the application of the assumption of the risk doctrine, which would bar a motorcyclist from recovering from a driver if the driver could establish that the motorcyclist voluntarily and knowingly assumed the risk of being injured when passing between two moving vehicles.

Alex Knaub, Law Clerk

Safer for riders

The "new" law allowing for lane splitting will have little direct impact on riders and drivers. The idea behind the law seems to be that of promoting educational programs for motorcycle riders. The truth is that no law will make drivers more aware of motorcycles speeding between them and the car next to them in the carpool lane. As a motorcycle rider, however, being able to legally go between vehicles promotes safety. This reduces the thought process required for emergency procedures that may necessitate driving between lanes. No rider wants to get a ticket for properly performing in an emergency but violating a traffic law.

Kristi Dean, Esq.

Both safe and scary

The only guidance before this law for drivers was a CHP Motorcycle Guidelines Manual. That was not always admissable to prove if "lane splitters" were acting safely. I like that the law is now codified. I recently litigated a case where a motorcycle operator drove between a RV and a large limo, and it was bad news for the motorcycle driver. For the RV operator, he was dragged into a lawsuit when it arguably wasn't his fault. My personal opinion is that "lane splitting" is often hazardous because motorcycle riders, like many auto drivers, sometimes make bad choices and take unnecessary chances.

Greg Miller, Esq.

Both safe and scary

Lane splitting has been permitted in California for as long as I have been riding motorcycles, meaning that it is common practice, and not cited by law enforcement. Although it has not been illegal, it is extremely dangerous, because most drivers do not actively look for motorcycles using the space between lanes. When a car makes an unsafe lane change and strikes a car, the results are typically two damaged cars. However, when a car makes an unsafe lane change and strikes a motorcycle, the results are typically physical injury to the motorcycle rider, which can be catastrophic. The risk factors are compounded by the rampant use of cell phones while driving and general lack of attention, and the lack of driver education aimed at awareness of motorcycle riders using the space between lanes. I also have concern for inexperienced motorcycle riders embracing their right to split lanes before they have the proper judgement and skill/motorcycle control to do so in a way that limits the risk. Over time, as DMV licensing requirements integrate awareness of motorcycle lane splitting, and law enforcement issues citations for unsafe lane changes by cars that threaten motorcycles, lane splitting will become less risky for motorcycle riders, but will never be a safe practice due to the unpredictable conduct of vehicle drivers.

OFFER TO COMPROMISE
CONTINUED FROM PAGE 6

are risks associated with ignoring the offer. For example, if a party does not receive a more favorable judgement or award at trial than the offer extended (i.e., if a plaintiff secures a verdict less than a defendant's Statutory Offer to Compromise or if a verdict is returned against a defendant in excess of a plaintiff's Statutory Offer to Compromise), the party serving the offer may be entitled to recover post-offer expert fees. (A recent change in the law limited recovery by both parties to post-judgment fees.)

So when should you serve a Statutory Offer to Compromise? The answer is once you have had a chance to evaluate the case and the exposure it presents. Ideally, that will be before expert fees are incurred. Whether a Statutory Offer is served to send a message (i.e., the value a party has assigned to a case), lay the groundwork for the possible future recovery of expert fees, or simply to broach the topic of settlement, it is an avenue worth exploring before trial.

Upcoming Events

Stone | Dean has partnered with Villa Esperanza, a non-profit dedicated to the developmentally disabled, to sponsor the Helmsman & Shipmate teams for the Tournament of Hope on October 24th, 2016. The Tournament of Hope is a pirate-themed golf tournament that will help raise money to aid disabled children, adults, and seniors. **To learn more about Villa Esperanza or donate, please visit: www.villaesperanzaservices.org**

Stone | Dean will be "adopting" two "cops" for the Foothill Area Booster Association's annual golf tournament on October 14th at the Angeles National Golf Club in Sunland. Proceeds from the tournament will benefit the LAPD's Foothill station. **To learn more about FABA or to participate in the event, please visit: www.faba16.org**

STONE | DEAN LLP
ATTORNEYS AT LAW

21600 Oxnard Street
Upper Lobby – Suite 200
Woodland Hills, CA 91367

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NEWS & ANNOUNCEMENTS

➔ Congratulations to Greg Stone who successfully represented and received compensation for S | D's client, a retired professional championship boxer in a case against another individual involving and assault and battery.

➔ Job well done to Robyn McKibbin for settling an employment dispute for unpaid commissions in favor of the employee, a former General Manager for a Southern California car dealership.

➔ In August, Greg Stone was a presenter and faculty member of the prestigious American Board of Trial Advocates (ABOTA), Jack Daniels Trial School. The school, a three day program, was taught to young trial lawyers by many of the top litigators in the country who presented various stages of a mock trial. Greg had the honor of presenting the closing argument for the defense opposite the plaintiff's side presented by a lawyer with nearly $1 billion in jury verdicts. "It was an honor to be asked. Every presenter was exceptional. The program was a success and inspiring," Greg said.

➔ Gregg Garfinkel joins OurHouse Grief Support Center in training local medical school students on how to talk with patients who are dying and families who are grieving. Gregg lectures first and second year medical students from USC and UCLA providing physicians a unique understanding and an impactful education in grief. For more about OurHouse, visit their website at www.ourhouse-grief.org .

➔ In August, Kristi Dean and Robyn McKibbin hosted an educational and entertaining seminar at the AAMGA University West Conference in Scottsdale, Arizona titled "Employee from Hell: Survival Tactics", a seminar designed for insurance broker business owners and senior management.

➔ In August, Kristi Dean hosted and presented a continuing education seminar for the Independent Insurance Agents and Brokers of Orange County. The seminar, entitled "Lessons Learned; Avoiding E & O Claims" offered attendees real-life case studies on errors and omissions claims and tips on how to prevent them. Kristi is an approved continuing education provider for the California Department of Insurance.

➔ Stone | Dean will be participating in Rotary's annual Thanksgiving basket collection. Our staff and attorneys will donate non-perishable items to provide Thanksgiving dinners to families in need.

STONE | DEAN LLP
21600 Oxnard Street
Upper Lobby – Suite 200
Woodland Hills, CA 91367
T: (818) 999-2232
F: (818) 999-2269

Questions or Comments:
Marleigh Green – Editor
mgreen@stonedeanlaw.com

Contributions By:
Matthew Harvey

VISIT US ONLINE:
www.stonedeanlaw.com

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