BAUM HEDLUND ARISTEI GOLDMAN PC
CONSUMER ATTORNEYS

Washington, D.C. Office
2101 L Street, N.W.
Suite 800
Washington, D.C. 20037-1526
Office (202) 466-0513
Fax (202) 466-0527

12100 Wilshire Boulevard, Suite 950
Los Angeles, CA 90025
Office (310) 207-3233
Fax (310) 820-7444
www.baumhedlundlaw.com

Philadelphia Office
1500 Market Street
12th Floor East Tower
Philadelphia, PA 19102-2100
Office (215) 665-5659
Fax (215) 569-8228

July 31, 2018

Via Federal Express

VANGUARD NATIONAL TRAILER CORPORATION
289 Water Tower Drive
Monon, IN 47959

Re:	**Decedent:**	MATTHEW HOAGLIN
	Our Client:	MYA HOAGLIN, a minor
	Incident:	Tractor Trailer v. Automobile
	Date of Incident:	April 16, 2018
	Location:	Tyrone Township, Michigan

LETTER OF REPRESENTATION AND NOTICE REGARDING SPOLIATION OF EVIDENCE

Dear Sir/Madam:

Please be advised that this office represents MYA HOAGLIN, for the loss of her father MATTHEW HOAGLIN, who was killed in the above referenced incident. We attach a copy of the police report for your convenience. Please direct all future correspondence to our Los Angeles office to the attention of the undersigned attorney who will be handling this claim. Please copy my assistant Mike Cornwell and paralegal Janet Ospina on any email communications. Our email addresses are as follows: *dmargermoore@baumhedlundlaw.com*, *mcornwell@baumheldundlaw.com*, and *jospina@baumhedlundlaw.com*.

At this time, we request any and all of the insurance information for VANGUARD NATIONAL TRAILER CORPORATION that could provide coverage for this incident including primary, excess and umbrella coverage. We also request policy limits information and copies of the declaration pages for all such insurance coverage. In addition, we request that VANGUARD NATIONAL TRAILER CORPORATION identify the motor carrier responsible for the tractor trailer, the state or federal DOT number for the tractor trailer.

Further, this letter is to formally demand the preservation of certain evidence related to this incident. If you, your representatives, insurer and/or legal counsel fail to properly secure and preserve these important pieces of evidence it may give rise to the legal presumption that the evidence would have been harmful to your side of the case, in addition to potential sanctions

and/or criminal penalties. We specifically request that the following evidence be maintained and preserved and not be destroyed, modified, altered, repaired, or changed in any manner:

1. The trailer involved in this collision.

2. Bills of lading for any shipments transported by HUSNIDIN SARIMSAKOV ("you" or "your") for the day of the collision and the thirty (30) day period preceding the collision.

3. Any oversized permits or other applicable permits or licenses covering the vehicle or load on the day of the collision.

4. All annual inspection reports for the truck trailer involved in the collision, covering the date of the collision.

5. Any lease contracts or agreements covering the trailer involved in this collision.

6. Any interchange agreements regarding the truck tractor and trailer involved in this collision.

7. All documents relating to the sale or lease or loan of this trailer for the period of 2016-2018.

8. All maintenance, inspection, or repair records and work orders, data, or invoices with regard to the trailer involved in the above collision.

9. Any weight tickets, fuel receipts, hotel bills, tolls, or other records of expenses, regardless of type, regarding the driver and the truck tractor and trailer involved in this accident for the day of the collision and the thirty (30) day period preceding the collision.

10. Any e-mails, electronic messages, letters, memos, or other documents concerning this collision. We require that you put any vendor which hosts or stores this data for you on notice of the need to preserve this data.

11. All manuals, diagrams, drawings, descriptions, plans, and patents for the trailer described as being involved in this collision.

12. Cargo pickup or delivery orders prepared by motor carriers, brokers, shippers, receivers, drivers, or other persons, or organizations for the day of the collision and for the thirty (30) days preceding the date of the collision.

13. Accounting records, cargo transportation bills and subsequent payments or other records indicating billings for transportation or subsequent payment for the transportation of cargo, with both the front and back of cancelled checks for cargo transported by the subject driver and/or truck tractor and trailer for thirty (30) days prior to the date of the collision as well as the day of the collision.

14. If not previously listed, all documents required by Federal Motor Carrier Safety Regulation 395.8, specifically those items identified in the Department of Transportation's interpretation of the regulation in its Answer to Question 10. This specifically includes weigh station receipts, fuel cards, EZ Pass, Pre Pass and other similar data, as well as data from other transponder systems. We require you to put any vendor which hosts or stores this data for you on notice of the need to preserve this data.

15. Any and all Internet of Things (IoT) data, metadata, devices, cell phones, or sensors present at the time of the incident, including, but not limited to; intelligent personal assistant applications such as Google Home hardware or Alexa, personal fitness trackers, senior trackers, automotive black boxes or event data recorders, smart car devices, drones or unmanned aerial vehicles, or any other voice recognition systems capable of voice interaction, music playback, making to-do lists, setting alarms, streaming podcasts, playing audio books, recording audio or video footage, and providing weather, traffic, and other real time information. This is to include any data sent to a server or cloud to process the audio request and formulate a response, or any data saved on the devices' internal or external hard drive. We request that these IoT devices remain unused and maintained exactly as they were at the time of the incident. We will need to have those items examined as they may reveal relevant information about time, speed, location, conversations, or other pertinent information recorded or saved at the time of the incident.

If the business practices of either you or your employees, your insured, agents, contractors, carriers, bailees, or other non-parties who possess materials reasonably anticipated to be subject to discovery in this matter involve the routine destruction, recycling, relocation, or mutation of such materials, you should, to the extent practicable for the pendency of this matter, either halt such business processes, sequester or remove such material from the business process, or arrange for the preservation of original documents, data, and tangible things, including electronic data and systems, as set out below.

All on-line storage devices such as hard drives for computer systems used to manage, manipulate or store data in the above-referenced matter and meeting the above-described parameters should be removed from operation and preserved as evidence. All off-line storage devices such as floppy disks, CD ROMs, etc. for computer systems used to manage, manipulate or store data in the above-referenced matter and meeting the above-described parameters should be removed from operation and preserved as evidence in a secured area.

In order to assure that your obligation to preserve documents and things is met, please immediately forward a copy of this letter to all persons and entities with custodial responsibility for the items referred to in this letter.

With regard to the trailer involved in this collision, we have already inspected the tractor and trailer but do not agree for it to be placed back in service until you have had the opportunity to save all information and data as requested herein.

To protect the interests of all parties, please take whatever steps are necessary to ensure that the vehicle and all parts and records are properly maintained and stored, with adequate

records as to chain of custody, and of inspection or testing undertaken prior to your receipt of this letter.

Thank you for your professional courtesy and cooperation in this matter. We look forward to speaking with you about this matter.

Very truly yours,

BAUM HEDLUND ARISTEI GOLDMAN, P.C.

By: Diane Marger Moore
Diane Marger Moore, Esq.

DMM/jo

Auth: Act 1949 PA 300 Sec 257.622
Compliance Required MSP UD-10E
Penalty $100 and/or 90 days (Rev 08/2016)

Submitted 0428726 Crash ID 1357425

Page 01 of 01
File Class 23001
Incident # 6130818
Reviewer SCOTT WILBER

STATE OF MICHIGAN TRAFFIC CRASH REPORT

ORI MI 4106100 | Department Name MSP Rockford

Crash Date	Crash Time	No of Units	Crash Type	Special Circumstances	Special Checks
04/16/2018	14:55	02	Angle	●None ○Hit and Run ○School Bus ○Fleeing Police ○Unknown ○Animal	●Fatal ○Non-Traffic Area ○ORV/Snowmobile

County	Traffic Control	Relation to Roadway	Weather	Area
41 - Kent	Signal	On the Road	Cloudy	INTR Within Intersection

City/Twp	Contributing Circumstances 1st	2nd	Light	Road Surface Condition	Total Lanes	Speed Limit	Posted
21 - Tyrone Twp	None		Daylight	Dry	04	55	Yes

Work Zone (if applicable) Type | Workers Present | Activity | Location

ROADWAY

Prefix	Primary Road Name	Road Type	Suffix	Divided Roadway
	M37	HWY		

Distance / Direction: 10 Feet N | Trafficway: Not Physically Divided

Prefix	Intersecting Road Name	Road Type	Suffix	Divided Roadway
	FRUIT RIDGE	AVE		

DRIVER

Unit Number	Unit Known	State	Driver License Number	Date of Birth (Age)	License Type	Endorsements	Sex	Total Occupants	Hazardous Action
01	Yes	FL	S652320853810	10/21/1985 (32)	●Operator ○Chauffeur ○Moped	○Cycle ○Farm ○Recreation	M	01	Failed to Yield

Unit Type	Driver Information	Driver is Owner	Injury	Position	Restraint
MV	HUSNIDIN SARIMSAKOV 4100 SW 28TH ST WEST PARK, FL 33023 (347) 955-6466	No	O	Front - Left	Shoulder and Lap Belt

Driver Condition at Time of Crash 1st	2nd	Driver Distracted By	Ejected	Trapped	Airbag Deployed
Appeared Normal		Not Distracted			Not Deployed

Hospital: NONE | Ambulance: NONE

Alcohol Suspected	Contributing Factor	Alcohol Test Type	Alcohol Test Results	Interlock Device
No	No	○Breath ●Blood ○Urine ○Field ●PBT ○Refused ○Not Offered	●Pending Test Results	No

Drug Suspected	Contributing Factor	Drug Test Type	Drug Test Results	Citation Issued
No	No	●Blood ○Urine ○Field ○Refused ○Not Offered	●Pending Test Results	○Hazardous ○Other

VEHICLE

Vehicle Registration	State	Vehicle Description	Year	Make	Model	Color
AU930B	NJ		2018	VOLVO		BLU

VIN	Vehicle Type	Special Vehicles	Private Trailer Type	Vehicle Defect
4V4NC9EH2JN889456	Truck / Bus	Not Applicable		

Automated System Engaged | Automated System Level in Vehicle | Automated System Level Engaged at Time of Crash

Insurance Company	Insurance Policy #	Towed By	Towed To
ROYALTY INS	CAC000010746317	BUD'S TOWING	BUD'S LOTT

Location of Greatest Damage	First Impact	Extent of Damage (Power Unit and/or Trailer)	Vehicle Direction	Vehicle Use	Action Prior
07	07	Minor Damage	N	Commercial (Business)	Turning Left

Sequence of Events: First | Second | Third | Fourth
● indicates MOST harmful event
01 - 17 - Motor Vehicle in Transport

PASSENGER

Passenger Information	Date of Birth (Age)	Sex	Position	Restraint

Injury	Ejected	Trapped	Airbag Deployed

Hospital | Ambulance

Passenger Information	Date of Birth (Age)	Sex	Position	Restraint

Injury	Ejected	Trapped	Airbag Deployed

Hospital | Ambulance

COMMERCIAL

Carrier Information:
LIDO TRANS INC
5 REVERE DR
NORTHBROOK, IL 60062

USDOT	MC	MPSC
000002592329	909449	

Driver's CDL Type	Endorsements	CDL Exempt
Group A	○H ○P ○T ○N ○S ○X	○Farm ○Other

GVWR/GCWR	Vehicle Configuration	Cargo Body Type	Medical Card	Hazardous Material	ID #	Class #
○ 10,000 lbs. or Less ○ 10,001 - 26,000 lbs. ● Greater than 26,000 lbs.	Tractor / Semi-Trailer	1	Yes	○ Placard ○ Cargo Spill		

OWNER

Owner Information | Owner Information

DAMAGED PROPERTY

Damaged Property | Public | Owner & Phone

UNIT

Unit Number	Unit Known	State	Driver License Number	Date of Birth (Age)	License Type	Endorsement	Sex	Total Occupants	Hazardous Action
02	Yes	MI	H245589234010	01/03/1985 (33)	Operator	Cycle	M	01	None

Unit Type	Driver Information	Driver's Owner	Injury	Position	Restraint
MV	MATTHEW ERIC HOAGLIN 8252 LACE DR STANTON, MI 48888	No	K	Front - Left	Shoulder and Lap Belt

Driver Condition at Time of Crash	Driver Distracted By	Ejected	Trapped	Airbag Deployed
1st: Unknown 2nd:	Unknown		Yes	Deployed - Front

Hospital	Ambulance
NONE	NONE

Alcohol Suspected	Contributing Factor	Alcohol Test Type	Alcohol Test Results	Ignition Device
No	No	Breath / Blood / Urine / Field / PBT / Refused / Not Offered	Pending — Test Results	No

Drug Suspected	Contributing Factor	Drug Test Type	Drug Test Results	Citation Issued
No	No	Blood / Urine / Field / Refused / Not Offered	Pending — Test Results	Hazardous / Other

Vehicle Registration	State	Vehicle Description	Year	Make	Model	Color
DVH3652	MI		1998	DODGE	RAM 1500	BLK

VIN	Vehicle Type	Special Vehicles	Private Trailer Type	Vehicle Defect
1B7HF16Z7WS739232	Pickup Truck	Not Applicable		

Automation System(s) in Vehicle	Automation System Level in Vehicle	Automation System Level Engaged at Time of Crash

Insurance Company	Insurance Policy #	Towed By	Towed To
UNKNOWN		BUD'S TOWING	

Occupant Greatest Damage Age	First Impact	Extent of Damage (Power Unit and/or Trailer)	Vehicle Direction	Vehicle Use	Action Prior
10	01	Disabling Damage	E	Private	Going Straight Ahead

Sequence of Events (●Indicates MOST harmful event)	First	Second	Third	Fourth
	●17 - Motor Veh in Transport			

PASSENGER

Passenger Information	Date of Birth (Age)	Sex	Position	Restraint

Injury	Ejected	Trapped	Airbag Deployed

Hospital	Ambulance

Passenger Information	Date of Birth (Age)	Sex	Position	Restraint

Injury	Ejected	Trapped	Airbag Deployed

Hospital	Ambulance

COMMERCIAL

Carrier Information	USDOT	MC	MPSC

Driver's CDL Type	Endorsement	CDL Exempt
	OH OP OT OM OS OX	Farm / Other

GVWR/GCWR	Vehicle Configuration	Cargo Body Type	Medical Card	Hazardous Material	ID #	Class #
10 000 lbs or Less / 10 001 - 26 000 lbs / Greater than 26 000 lbs				Placard / Cargo Spill		

OWNER

Owner Information	Owner Information

WITNESS

Witness Information	Witness Information
MARY KAY HAWLEY 3772 S PINE AVE NEWAYGO, MI 49337 (231) 652-5927	

Investigated At Scene	Reported Date (Time)	1st Investigator Name (Badge)	2nd Investigator Name (Badge)	Photos
Yes	04/16/2018 (16:19)	KYLE RADEMACHER (643)		Yes

Narrative

#1 was n/b on Fruit Ridge Ave at the stop sign/signal. #2 was se/b on M37. #1 advised he did not see #2. #1 pulled out to turn left (ne) onto M37 and #2 collided with the trailer of #1. #2 became wedged underneath the trailer of #1. Witness Hawley advised she was n/w on M37 when she saw the crash in front of her. She advised #1 just pulled out in front of #2. Hawley spoke with the driver of #1 and the driver stated he didn't see #2. Hawley stated she didn't see the impact, just the debris thrown from around the trailer.

