

IN THE CIRCUIT COURT OF MARSHALL COUNTY, WEST VIRGINIA  
BUSINESS COURT DIVISION

AXIALL CORPORATION and  
WESTLAKE CHEMICAL CORPORATION,

Plaintiffs,

vs.

NATIONAL UNION FIRE INSURANCE  
COMPANY OF PITTSBURGH, PA.; ALLIANZ  
GLOBAL RISKS US INSURANCE COMPANY;  
ACE AMERICAN INSURANCE COMPANY;  
ZURICH AMERICAN INSURANCE COMPANY;  
GREAT LAKES INSURANCE SE; XL  
INSURANCE AMERICA, INC.; GENERAL  
SECURITY INDEMNITY COMPANY OF  
ARIZONA; ASPEN INSURANCE UK LIMITED;  
NAVIGATORS MANAGEMENT  
COMPANY, INC.; IRONSHORE SPECIALTY  
INSURANCE COMPANY; VALIDUS  
SPECIALTY UNDERWRITING SERVICES,  
INC.; and HDI-GERLING AMERICA  
INSURANCE COMPANY,

Defendants.

FILED

2021 FEB 10:24

JOSEPH M. RUCKI

Civil Action No. 19-C-59

Judge Christopher C. Wilkes

**COMMISSION AUTHORIZING REQUEST FOR  
ISSUANCE OF SUBPOENA TO JAMES DOYLE**

To the Honorable Judge of the Supreme Court of New York and to the Clerk of Said  
Court:

On Application of Defendants, by counsel, pursuant to West Virginia Rule of Civil  
Procedure 28(d), and the Uniform Interstate Depositions and Discovery Act, W. Va. Code  
§ 56-12-1, et al., NY CPLR § 3119, for this Commission, said Defendants, having informed this  
Court, a Court of Record in this State, James Doyle, a person who works and regularly transacts  
business within the jurisdiction of your Court, does have information and knowledge relevant to  
the adjudication of the above-styled civil action now pending before this Court, including, but  
not limited to, the placement of the insurance on behalf of the Axiall Corporation and its

predecessors, as well as the claim at issue in this litigation. Defendants are desirous for the issuance of a subpoena from your Honorable Court for service upon the said James Doyle.

IT IS ORDERED that the counsel of record for the Defendants in the instant action, whose name and address is set forth below, is hereby commissioned by this Court to subpoena the appearance of James Doyle pursuant to West Virginia Rules of Civil Procedure 26, 28, and 30, at such date, time and place as shall be designated upon appropriate subpoena.

YOU ARE REQUESTED AND COMMISSIONED to issue to the counsel for the Defendants named below, such subpoena from your Court as may be available and necessary for service upon the aforesaid James Doyle to facilitate his appearance for said deposition.

This Court specifically observes to you that reciprocal privileges under West Virginia Rule of Civil Procedure 28(d) are extended to members of the bar of your Court for the issuances of equivalent subpoenas within the State of West Virginia. Moreover, both New York and West Virginia are parties to the Uniform Interstate Deposition and Discovery Act.

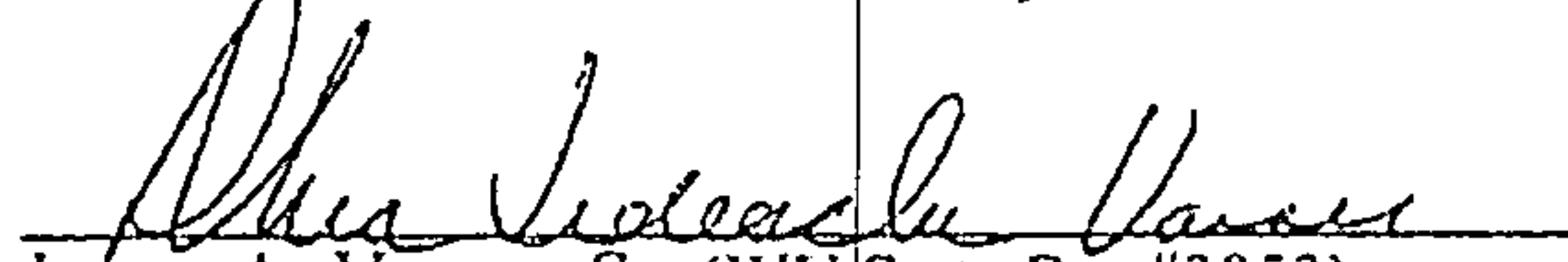
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February 12, 2021

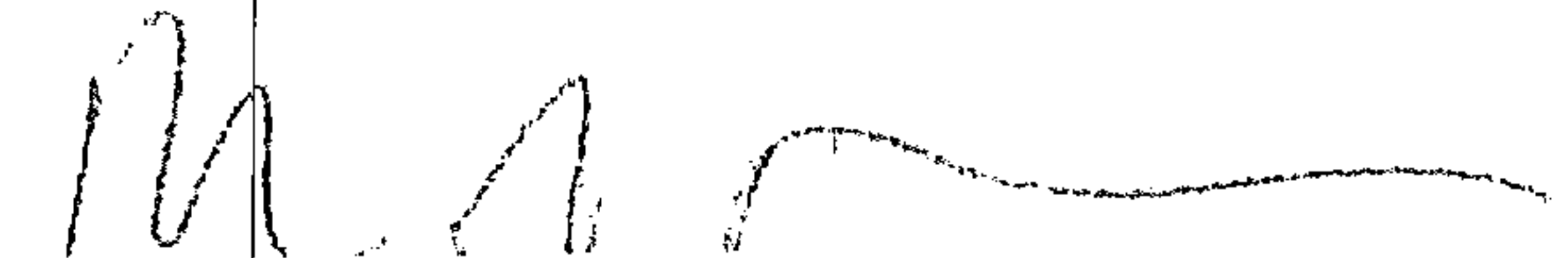


Honorable Christopher C. Wilkes

This Commission tendered by:



James A. Varner, Sr. (WV State Bar #3853)  
Debra Tedeschi Varner (WV State Bar #6501)  
Varner & Van Volkenburg PLLC  
360 Washington Avenue  
Clarksburg, WV 26301  
Tel: (304) 918-2840 / Fax: (304) 566-1161



Myles A. Parker (*admitted pro hac vice*)  
Alexandra F. Markov (*admitted pro hac vice*)  
Justin M. Sumrall (*admitted pro hac vice*)  
Erin D. Guyton (*admitted pro hac vice*)  
Benjamin C. Lewis (*admitted pro hac vice*)  
James L. Warren, III (*admitted pro hac vice*)  
Jay M. Patterson (*admitted pro hac vice*)  
Carroll Warren & Parker PLLC  
188 East Capitol Street, Suite 1200  
P. O. Box 1005  
Jackson, MS 39215-1005  
Tel: (601) 592-1010 / Fax: (601) 592-6060