

FILED

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

2021 FEB 12 AM 10:24

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.

JOSEPH M. RUCKI  
Civil Action No. 19-C-59

Judge Christopher C. Wilkes

**COMMISSION AUTHORIZING REQUEST FOR  
ISSUANCE OF SUBPOENA TO MICHAEL PERRON**

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, Michael Perron, 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. Defendants are desirous for the issuance of a subpoena from your Honorable Court for service upon the said Michael Perron.

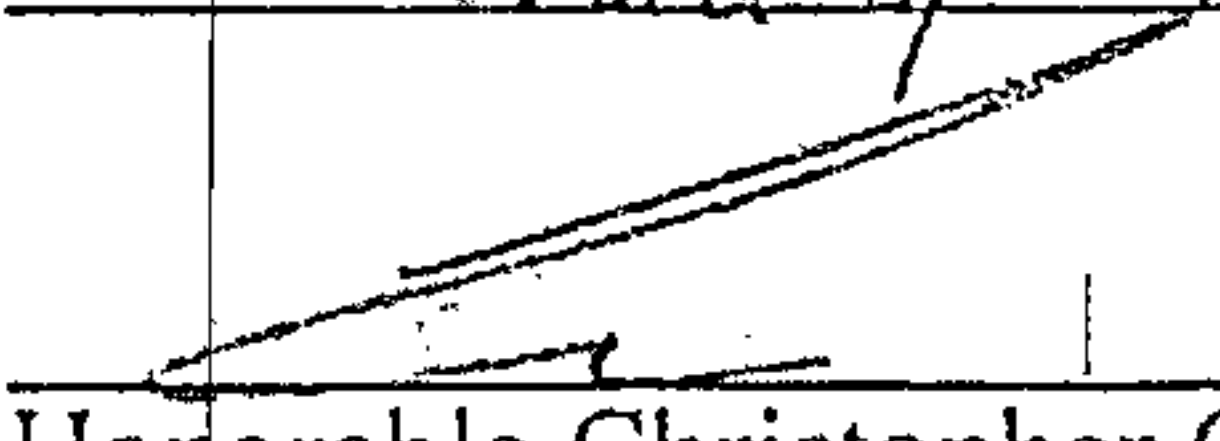
**IT IS ORDERED** that the counsel of record for the Defendants in the instant action, whose name and address is set forth below, is hereby commissioned by this Court to subpoena the appearance of Michael Perron pursuant to West Virginia Rules of Civil Procedure 26, 28, and 30, at such date, time and 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 Michael Perron to facilitate his appearance for said deposition.

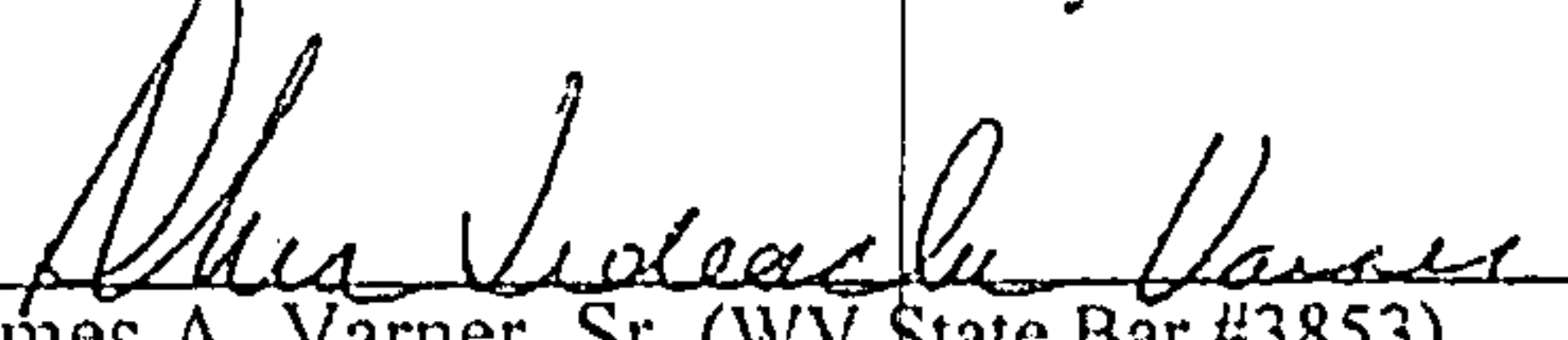
This Court specifically observes to you that reciprocal privileges under West Virginia Rule of Civil Procedure 28(d) are extended to members of the bar of your Court for the issuances of equivalent subpoenas within the State of West Virginia. Moreover, both New York and West Virginia are parties to the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

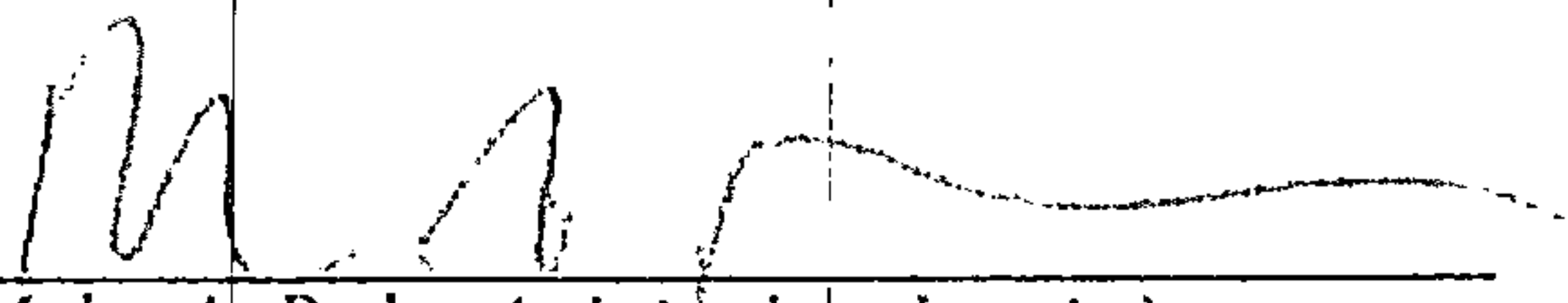
ENTER:

February 12, 2021

  
Honorable Christopher C. Wilkes

This Commission tendered by:

  
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