

5. Defendant Wiley has been a resident of Lake County, Indiana at all times relevant to the present complaint;

6. At all relevant times, defendant United Automobile Insurance Company (UAIC) provided defendant Wiley auto insurance coverage for the referenced collision pursuant to policy #INU 010623800;

7. Defendant UAIC was incorporated on March 2, 1989 in Miami Gardens, Florida and has been a property and casualty insurance organization specializing in automobile insurance at all times relevant to the present complaint;

Count I

Comes now Plaintiff Rodney A. Logal, *pro se*, and for his cause of action against defendant Briana N. Wiley for auto damage, says as follows:

8. The foregoing paragraphs 1 through 7 are incorporated herein and made part of this Count I as if fully set forth;

9. The aforementioned auto collision was the direct and proximate result of intentional, negligent, and/or reckless conduct on the part of defendant Wiley exclusively;

10. As a direct and proximate result of said collision, plaintiff's aforementioned Coupe DeVille was damaged;

11. To date, defendant Wiley has not offered or paid a fair amount to cover the cost of repairing said damage;

Count II

Come now Plaintiffs Rodney A. Logal and Zena Crenshaw-Logal, *pro se*, and for their cause of action against defendant Briana N. Wiley for personal injury, say as follows:

12. The foregoing paragraphs 1 through 11 are incorporated herein and made part of this Count II as if fully set forth;

13. Both Plaintiffs Rodney A. Logal and Zena Crenshaw-Logal have suffered anxiety and been inconvenienced as a direct and proximate result of the aforementioned collision and corresponding auto damage;

Count III

Come now Plaintiffs Rodney A. Logal and Zena Crenshaw-Logal , *pro se*, and for their cause of action against defendant United Automobile Insurance Company (UAIC) for insurance bad faith, say as follows:

14. The foregoing paragraphs 1 through 13 are incorporated herein and made part of this Count III as if fully set forth;

15. Defendant UAIC assigned number 1500002254-001-384 to the insurance claim of Plaintiff Rodney A. Logal precipitated by the referenced auto collision between defendant Wiley and Plaintiff Zena Crenshaw-Logal;

16. By letter of August 9, 2013, Plaintiff Rodney A. Logal made defendant UAIC aware of his good faith dispute of its proposed settlement of said claim for the amount of \$785.23, and countered with a proposal to settle for \$1,846.54 based on a tendered repair estimate which he secured independent of UAIC's collision investigation;

17. Defendant UAIC reportedly objected to settling for the higher amount proposed by Plaintiff Rodney A. Logal and/or any amount higher than its original settlement offer of \$785.23 due to "certain discounts taken based on pre-existing conditions" of his damaged Coupe DeVille;

18. Despite multiple efforts on the part of both Plaintiffs to confirm the basis of UAIC's unilateral "discounts", said defendant would not respond in any way;

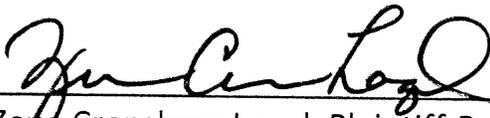
19. Defendant UAIC would not respond to the Plaintiffs' reasonable request for elaboration on its referenced discounts even after they confirmed having no choice in 2013 but to pursue litigation against its insured, defendant Wiley, and UAIC for bad faith;

20. Both Plaintiffs Rodney A. Logal and Zena Crenshaw-Logal have suffered anxiety and been inconvenienced as a direct and proximate result of the intentional and/or negligent delay in resolving its referenced claim number 1500002254-001-384, which delay constitutes actionable bad faith;

WHEREFORE, Plaintiff prays for:

- (a). judgment against the defendants, jointly and severally;
- (b). compensatory damages, including but not limited to the costs of this action;
- (c). punitive damages to the extent appropriate; and
- (d). any and all relief just and proper upon the premises.

Respectfully Submitted,



Zena Crenshaw-Logal, Plaintiff *Pro Se*

and



Rodney A. Logal, Plaintiff *Pro Se*

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