

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

MICHAEL FELDMAN,)	
)	
Plaintiff,)	
)	
vs.)	No. SC 042271
)	
MERCURY INSURANCE COMPANY,)	
AUTO INSURANCE SPECIALISTS,)	
INC., AUTO INSURANCE)	
SPECIALISTS - SANTA MONICA, INC.,)	
and DOES 1 through 100, Inclusive,)	
)	
Defendants.)	

DEPOSITION OF RICHARDS D. BARGER, JR.

Santa Monica, California

Monday, April 21, 1997

CERTIFIED COPY

Reported by:

SUSAN M. STEVENS
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1 Q Okay. What other unwritten rules for -- strike
2 that.

3 What other unwritten underwriting rules did
4 Mercury have with respect to selling its good driver auto
5 insurance?

6 MS. ABROLAT: Objection.

7 BY MR. SARGOY:

8 Q That is --

9 MS. ABROLAT: Sorry.

10 BY MR. SARGOY:

11 Q -- what other categories or classes of persons
12 did Mercury not want to insure to your knowledge?

13 MS. ABROLAT: Objection. Calls for speculation. No
14 foundation. Assumes facts not in evidence. Vague and
15 ambiguous.

16 MS. KELLY: Same objections.

17 THE WITNESS: Can I proceed now?

18 BY MR. SARGOY:

19 Q Please.

20 A There were rules regarding what I call
21 household composition, husband and wife age differences.

22 Q Is household composition husband and wife --

23 A In other words, if a -- if the husband was much
24 younger than the wife, we couldn't entertain the account.
25 There were rules about surnames they didn't like, certain

1 ethnic groups.

2 Q Which ethnic groups?

3 MS. ABROLAT: Same objections.

4 THE WITNESS: Middle eastern.

5 BY MR. SARGOY:

6 Q Any others?

7 A Indian.

8 Q Is that east Indian?

9 A Well, I -- I would imagine from Delhi, you
10 know. What do you call that? Indian.

11 Q Yes. Or would it include all Native Americans?

12 MS. ABROLAT: Same objections.

13 THE WITNESS: I don't know about Native Americans.

14 BY MR. SARGOY:

15 Q But east Indian?

16 A I would think so.

17 Q Any other surnames?

18 A Off the top of my head, those are the ones that
19 really come to mind.

20 Q What other unwritten rules?

21 MS. KELLY: Same objections.

22 THE WITNESS: I would have to -- hold on just a
23 second here. I'm just trying to remember a lot of things.
24 You have to remember I'm not a personal lines person, so I
25 don't have a lot of information. I know what I hear from our