

As former Chief Underwriting Officer and General Counsel of National Union (AIG), Ty Sagalow has a unique background in legal, underwriting, policy drafting and claims. He was recently affirmatively determined to be "qualified insurance expert" by the United States District Court for the Southern District of California under Rule 702 of the Federal Rules. Mr. Sagalow has been retained as a testifying expert in 23 cases in the last 24 months, and has provided expert reports, deposition testimony and testimony at trial. He was also named "Most Helpful Expert" in a recent \$8.7M coverage decision.

Mr. Sagalow served as Chief Underwriting Officer and General Counsel for AIG Executive Liability (formerly National Union Fire Insurance Company of Pittsburgh, PA), the world's largest carrier of Financial Lines liability Insurance. As General Counsel, Mr. Sagalow personally wrote or led teams that wrote all the policies that AIG produced between 1988 and 2000 – policies which continue to serve as the foundational wording for policies in the market today. As AIG Executive Liability's Chief Underwriting Officer, Mr. Sagalow was charged with all underwriting interpretations and decisions for AIG Financial Lines.

With respects to claims handling, as Chief Underwriting Officer of National Union Fire, Mr. Sagalow had frequent contact with senior members of the claims department. As a matter of process, both senior underwriters and senior claims personnel worked hand in hand in the creation of any new insurance policy. This occurred in every major new policy. It was the practice of AIG to locate claims physically next to underwriting. Further, he was frequently a participant in major claim meetings. This occurred several times a year for major claims. It also was commonplace for me and the head of claims to discuss coverage positions on potential claims submitted to the company. It would not be uncommon for this type of conversation to occur at least once a week. Mr. Sagalow has testified at trial as an expert in both exclusionary language and claims handling.

Mr. Sagalow has represented both pollcyholders and insurance carriers as an expert witness in over 24 cases in the last 2 years and has testified at both trial and at deposition.

On March 27, 2014, the United States District Court for the Southern District of California affirmatively held that Mr. Sagalow was a qualified insurance expert under Rule 702:

[Defendant's] expert, Ty R. Sagalow, is qualified under Rule 702 by way of his experience and education. Mr. Sagalow has over 30 years' experience as an insurance executive, and has served as both chief underwriting officer and general counsel at one of the world's largest insurance companies. His diverse professional experience at a variety of companies in the insurance industry demonstrates a breadth of experience drafting and interpreting policies, making underwriting decisions, and claims handling....The Court concludes that Sagalow's experience, training and education provided a sufficient foundation of reliability for his testimony. His specialized knowledge in the insurance field may be helpful to the trier of fact in understanding the evidence or determining facts in issue.

Ty is a cum laude graduate of Georgetown University Law Center and holds a LLM from New York University School of Law. He is also a licensed Property & Casualty Insurance Broker.

Mr. Sagalow has a flexible hourly rate depending upon the type and complexity of the case and prefers to discuss his rate after the initial discussion with coverage counsel.

His CV and additional information can be obtained at <a href="http://innovationinsurancegroup.com/our-services/expert-witness-services/">http://innovationinsurancegroup.com/our-services/expert-witness-services/</a>