

GROTEFELD HOFFMANN, LLP

VINCENT G. RABOTEAU 11098

vraboteau@ghlaw-llp.com

Pacific Guardian Center, Makai Tower

733 Bishop Street, Suite 2070

Honolulu, Hawai'i 96813

Telephone No.: (808) 458-5060

Facsimile No.: (312) 551-2402

Counsel for Subrogation Plaintiffs
(see signature page for full list
of parties and counsel)

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

In RE: Lāhainā Wildfire Litigation

1:24-cv-00259-JAO-BMK
(Class Action)

**SUBROGATION PLAINTIFFS'
MOTION TO INTERVENE;
MEMORANDUM IN SUPPORT OF
MOTION; DECLARATION OF
NORMAND LEZY;
DECLARATION OF VINCENT G.
RABOTEAU; EXHIBITS 1 TO 7;
CERTIFICATE OF SERVICE**

HEARING

Date: _____

Time: _____

Judge: Hon. Jill A. Otake

No Trial Date

SUBROGATION PLAINTIFFS' MOTION TO INTERVENE

The undersigned Subrogation Plaintiffs respectfully submit this Motion to Intervene pursuant to FRCP 24(a)(2) and FRCP 24(b)(1)(B). A copy of the proposed pleading setting out Subrogation Plaintiffs' claims is attached as **Exhibit 1** to the Declaration of Vincent G. Raboteau. This motion is supported by the following memorandum of points and authorities, the accompanying declaration of Vincent G. Raboteau, any oral argument, and the pleadings on file in this matter.

STATEMENT OF COMPLIANCE

Prior to the filing of this motion, the parties' counsel met and conferred pursuant to LR7.8 on September 19, 2024.

DATED: Honolulu, Hawai'i, September 26, 2024.

GROTEFELD HOFFMANN

By: /s/ Vincent G. Raboteau

VINCENT G. RABOTEAU

Counsel for Subrogation Plaintiffs

AMGUARD INSURANCE COMPANY; CONCERT SPECIALTY INSURANCE COMPANY; GENERAL CASUALTY COMPANY OF WISCONSIN; THE CINCINNATI INSURANCE COMPANY; UNIVERSAL PROPERTY & CASUALTY INSURANCE COMPANY; CERTAIN INTERESTED UNDERWRITERS AT LLOYD'S SUBSCRIBING TO POLICY PG2203220; CERTAIN INTERESTED UNDERWRITERS AT LLOYD'S SUBSCRIBING TO POLICY PG2203891; STATE FARM FIRE AND CASUALTY COMPANY; STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY; HARLEYSVILLE INSURANCE COMPANY OF NEW YORK; ASPEN SPECIALTY INSURANCE COMPANY; ALLSTATE FIRE AND CASUALTY INSURANCE COMPANY; ALLSTATE INDEMNITY COMPANY; ALLSTATE INSURANCE COMPANY; ALLSTATE PROPERTY AND CASUALTY INSURANCE COMPANY; ALLSTATE VEHICLE AND PROPERTY INSURANCE COMPANY; INTEGON NATIONAL INSURANCE COMPANY;

CERTAIN UNDERWRITERS AT LLOYD'S and VARIOUS NON-LLOYD'S
INSURERS SUBSCRIBING TO POLICIES PIV209015, PIV205089, PIV202904,
PIV201596, PIV201325, PIV200359, PIV199831, PIV199736, PIV198096,
PIV195519