

## OIC Rules Coordinator

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**From:** Scott Ugelstad <[scott@davislawgroupseattle.com](mailto:scott@davislawgroupseattle.com)>  
**Sent:** Friday, August 8, 2025 11:42 AM  
**To:** OIC Rules Coordinator  
**Cc:** Scott Ugelstad  
**Subject:** R2025-05 First Prepublication draft comment

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### External Email

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Dear OIC,

I am fully in support of the proposed changes in R2025-05. I've found time and time again that insurance companies think they are above the law, or that the law will not be enforced upon them. We have to get far into a bad faith action for them to see the light. They gamble that a Plaintiff's attorney will not take those steps, and many don't so their gamble pays off. These proposed changes will make it easier for the insurance companies to be held accountable and, in turn, force them to cooperate early. The insurance companies hold all the cards. These proposed changes are a much-needed attempt to balance the scales. I am happy to provide more insight if requested.

Thank you,  
Scott



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