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State of Minnesota
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STATE OF MINNESOTA DISTRICT COURT

COUNTY OF OTTER TAIL SEVENTH JUDICIAL DISTRICT

Craig Stevenson and
Marie Stevenson,

Plaintiffs,

v.

Sean Christopher Stevenson,
Renee Stevenson, and
Lisa Stevenson-Allen,

Defendants.

Court File No.: 56-CV-20-2928
Case Type: Other Civil

DECLARATION OF CRAIG STEVENSON

STATE OF MINNESOTA)
) SS.
COUNTY OF OTTER TAIL)

Craig Stevenson declares as follows:

1. I am one of the plaintiffs in the above-captioned matter.

2. I am a resident of the County of Otter Tail, State of Minnesota.

3. Renee and I were married on August 7, 1982.

4. My dad, Sheldon C. Stevenson, operated Todd County Agency from his office inside the Citizen's State Bank building, selling insurance for Milbank Insurance Company among others.

5. Between August 7, 1982 and August 28, 1982, I was inside the Citizen's State Bank in Eagle Bend.

6. It was a bright, sunny day outside.

7. I was at one of the teller windows near the rear of the lobby area.

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8. My dad approached me and asked me to stop by his office after I finished.

9. He did not state what he wanted to discuss with me, and I had no idea why he wanted to speak with me.

10. I finished my business at the teller window and entered my dad's office.

11. My dad said, "Now that you and Renee are married, it would be a good idea to have your name added to her homeowner's policy."

12. He explained that in the event of an accident, if Renee were injured or incapacitated, I could not file a claim with her insurance company, without much difficulty, if my name was not on the policy.

13. I told my dad, "Go ahead. I'll tell Renee when I get home."

14. My dad chuckled and said, "It doesn't work that way."

15. My dad explained that he had to get Renee's permission before adding my name to her homeowner's policy.

16. I asked my dad if I needed to bring home a form or some other official document for Renee to sign.

17. My dad said that he simply needed a verbal authorization from Renee and that he could call her on the phone.

18. My dad asked me if Renee was home.

19. I said that she was home, but because of the nice weather, she was probably outside working in the garden.

20. My dad picked up his office phone and dialed Renee's number.

21. It took many rings (at least 5 or 6) for her to answer the phone.

22. When Renee answered the phone, my dad identified himself, noted that I was

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present in his office, and explained to Renee that he thought it would be a good idea for my name to be added to her homeowner's insurance policy.

23. My dad also explained that adding my name to the homeowner's policy would make the claims process easier.

24. My dad asked for Renee's permission to add my name to her homeowner's policy and hung up the phone.

25. My dad stated, "She said that's fine."

26. The total length of the phone call was less than 2 minutes.

27. My dad wrote something on a small note pad, tore the note off the pad and attached it to a file folder that was on his desk.

28. Very shortly after this event, Renee suggested that my name should also be added to an insurance policy that she had with American Family Insurance.

29. Prior to this I had no idea that Renee had an insurance policy with American Family Insurance.

30. Renee called her American Family Insurance agent in Alexandria.

31. The phone call was placed from Renee's living room.

32. The agent's last name was Marciniak.

33. Renee told the agent that she had recently married and that she wanted her husband's name added to her insurance policy.

34. Renee introduced me to the agent and handed the phone to me.

35. I spoke briefly to the agent and gave him my full name and birthdate or social security number.

36. I handed the phone back to Renee, and she said goodbye.

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37. I have no recollection about what was covered by this insurance policy.

38. In summary, my name was added to two of Renee's insurance policies shortly after our wedding on August 7, 1982.

39. It was my dad's suggestion to have my name added to Renee's homeowner's insurance policy.

40. It was Renee's suggestion to have my name added to her insurance policy from American Family Insurance.

41. Renee gave her express permission to add my name to her insurance policies in both cases.

42. I did not add my own name to any of Renee's insurance policies.

43. I did not have my name added to any of Renee's insurance policies without her knowledge or consent.

44. I contacted State Auto Insurance Companies, who purchased Milbank Insurance Company in the 1990s, but they were unable to access insurance policy records from 1982.

45. I contacted American Family Insurance, but they were unable to access insurance policy records from 1982.

I DECLARE UNDER PENALTY OF PERJURY THAT EVERYTHING I HAVE STATED IN THIS DOCUMENT IS TRUE AND CORRECT.

Dated: October 1, 2021

s/ Craig Stevenson
Craig Stevenson