

Wendy Wagner
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June 8, 2021

Ms Laurie Saldutti, Claims Supervisor
Northeast Workers' Compensation
Chubb Group of Insurance Companies
555 Long Wharf Drive, 10th fl,
New Haven CT 06511

Re: Wendy Wagner. WCB: 2770-9381. CC: 7630-6262. DOI: 3-10-77
Dx: Spinal Cord Injury with Severe Autonomic Dysfunction.

Dear Laurie,

I found the stipulation in the Medical Guidelines Law that Chubb Management used as the rationale for their Decision, told to me many times, Not To Use The Medical Guidelines Law On My Case, "DUE TO THE NATURE OF MY DIAGNOSIS."

There is voluminous documentation in 44 years of medical reports on my Work Related Injury to prove that my Diagnosis(ses) is covered by this stipulation.

"BODY PARTS NOT COVERED BY THE GUIDELINES

How will injuries to parts of the body not covered by the Medical Treatment Guidelines be handled by insurers?

Work related injuries not covered by the Medical Treatment Guidelines will be handled as they have been prior to the implementation of the Medical Treatment Guidelines. The provider should follow their normal standard of care and the normal Board rules and processes, including authorization of treatment in excess of \$1,000."

CHUBB established, and agreed to a standard of care for my case decades ago, based on my diagnoses, which they followed in good faith for 37 years using employees, vendors, and outside companies to facilitate the agreements.

Chubb's decision (agreement) and pattern of action for 37 years set a precedent for present actions. Chubb administrative Authorities followed a consistent pattern of action based on the agreement, using state and federal legal channels and financial institutions to facilitate and fulfill an express promise made by their authority, which gives me a Legitimate Expectation of continuance of the agreements followed in good faith by both parties.

Thus, Michelle Lopa's letter of 2018 confirming that "nothing will change."

Sincerely, Wendy Wagner