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February 18, 2025

ALEJANDRO CHAVANA
HECTOR CHAVANA
CHAVANA LAW PLLC
2702 Little York Rd.
Houston, TX 77093

RE: STOWERS DEMAND FOR POLICY LIMIT PAYOUT

Case No. 2024-87786 in the 189th District

JOSE & Friends:

Please be advised: I am in receipt of your letter of demand of February 18, 2025, which I have taken as a rejection of my offer to compromise served upon you February 12, 2025. That offer is now off the table.

As I have previously requested your insured carrier information including policy numbers, etc., this letter will serve as a Formal Stowers Demand for the Full Policy Amount, or if no policy exists; for \$1,000,000.00 paid on or before March 31, 2025.

While your demand letter cites estoppel and waiver as defenses to your clients extreme and outrageous conduct, this theory and your position is disingenuous, and cute at best. Even a law firm in the armpit of Houston, TX knows, or should know, that a party cannot waive or assume the risks associated with your clients grossly negligent, extremely reckless, and intentionally tortious acts of dumping over \$100,000.00 worth of a clients belongings in a parking lot in the middle of no where because they were \$160 late on a payment; especially after this party offered to cover

all the fees. This conduct was criminal and malicious, and your client will be financially responsible.

Please advise of your client's acceptance, or alternatively, your insureds policy acceptance of this offer on or before this date.

Respectfully,

/s/ ANDREW LEHMAN, Sr.
Plaintiff Pro Se
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Envelope ID: 97521935

Filing Code Description: Notice

Filing Description: NOTICE OF STOWERS DEMAND FOR INSURANCE POLICY LIMIT

Status as of 2/19/2025 8:56 AM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Hector AChavana		hector@chavana.lawyer	2/18/2025 8:04:41 PM	SENT
Alejandro Cortez		alejandro@chavana.lawyer	2/18/2025 8:04:41 PM	SENT
Andrew Lehman Sr		lehmanlaw2002@gmail.com	2/18/2025 8:04:41 PM	SENT

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