

LAW OFFICES  
**MELINDA JANE STEUER**  
428 J Street, Suite 225  
Sacramento, CA 95814  
(916) 930-0045

August 28, 2012

**SENT VIA CERTIFIED MAIL**

Mr. Joshua Thomas  
Senior Moving Consultant/Sales Manager  
Global Express Van Lines  
1585 Sulphur Spring Road  
Baltimore, MD 21227

**Re: *Fred Farrokhnia - Job No.:D329047***

Dear Mr. Thomas:

I am writing on behalf of Fred Farrokhnia with regard to your firm's mishandling of his move and its failure to deliver more than 26 of his items to him. A copy of the contract that Mr. Farrokhnia signed and the inventory list is enclosed for your reference.

Specifically, on March 26, 2012, Mr. Farrokhnia signed a contract with you to pack and deliver his personal belongings from McLean, Virginia to Folsom, California. The pickup date was April 19, 2012. The delivery date was to be May 6, 2012. You delivered just 89 of the 161 items that you picked up. After two weeks of daily telephone calls, you delivered 46 of the missing items on or about June 6, 2012. Since that time, Mr. Farrokhnia has made several attempts to contact you by phone and e-mail to find out the status of the remaining 26 items. You have not responded to any of his e-mails nor returned any of his phone calls.

The items that Mr. Farrokhnia is still missing include the following:

1. Camera and photographs taken of Mr. Farrokhnia's children while they were young and of his father and mother (who are now deceased). These photographs are priceless. They cannot be replaced.
2. Four - five pairs of summer "Zegna" pants. Estimated value = \$1,440.00 to \$1,800.00 (\$360.00 each).
3. Five to ten "Zegna" shirts. Estimated value = \$1,750.00 to \$3,500.00 (\$350.00 each)
4. Four "Zegna" pullovers. Estimated value = \$1,500.00 (\$375.00 each).
5. Five to seven "Polo" shirts. Estimated value = \$450.00 to \$630.00 (\$90.00 each)

6. Side table from living room set with marble top. Estimated value unknown but replacement value is expected to exceed \$1,000.00.
7. Coin collection. Estimated value is unknown. This collection is irreplaceable.
8. Ironing board. Estimated value = \$35.00.
9. Plastic laundry basket full of clothes. Estimated value is unknown at this time but is expected to exceed \$1,000.00.
10. Straw laundry basket full of clothes. Estimated value is unknown at this time but is expected to exceed \$1,000.00.
11. Duffel bag with Pepsi label on it full of items. Estimated value is unknown at this time but is expected to exceed \$1,000.00.
12. Silverware from Iran. The exact estimated value is unknown at this time but is expected to exceed \$5,000.00.
13. Paperwork from previous employers and tax returns. These items are irreplaceable.

In addition to the foregoing, there are many other items that Mr. Farrokhnia continues to learn are missing as he needs them and is unable to locate them. Mr. Farrokhnia reserves the right to supplement the foregoing list of missing items.

I would ask that you contact me promptly as to the status of the missing items set forth above and when Mr. Farrokhnia can expect to receive them. Please be advised that if I do not hear back from you within 14 days of your receipt of this letter with a confirmation that you will return Mr. Farrokhnia's belongings to him by a date certain in the immediate future, we will file a formal complaint against you and your company with the Department of Transportation and the Better Business Bureau. Mr. Farrokhnia will also consider taking legal action against you and your company for breach of contract, breach of the implied covenant of good faith and fair dealing, negligence and all other damages and remedies to which he is entitled under the law. I hope that will not be necessary.

Very truly yours,

Melinda Jane Steuer

Mr. Joshua Thomas  
Senior Moving Consultant/Sales Manager  
Global Express Van Lines  
1585 Sulphur Spring Road  
Baltimore, MD 21227