

RE: Formal Demand for Immediate Response and Production of Records

DATE: June 17, 2026

Mr. Morrow:

I write regarding your recent correspondence and the documents you have provided concerning my Verizon phone and internet accounts. Your responses have raised numerous additional questions and highlighted significant inconsistencies regarding the records maintained by Verizon, the representations made to me during the sales process, and the documentation supporting my accounts.

This letter serves as a formal demand that Verizon provide complete written responses to the following questions and produce all responsive records immediately.

1- The document recently provided to me is marked "Customer Copy." If this document was intended to be provided to me at the time of the transaction, please explain why it was not provided when the agreement was executed and why I have been forced to repeatedly request it for several days before receiving it.

2- Please explain why the document reflects a purchase date of June 1, 2025, when the transaction was actually completed on or about May 18, 2025.

3- You have stated that there are no combined agreements covering both my phone and internet services. If that is true, please identify and produce the service agreement governing my phone service, including all documents reflecting my monthly payment obligations.

4- Please identify and produce the service agreement governing my internet service, including all documents reflecting my monthly payment obligations.

5- You have stated that separate bills would be issued for phone and internet services. However, the records provided appear to reflect only internet service payments. Please explain where the records of my phone service payments are maintained and provide complete copies of those records.

6- You stated that Verizon has no promotion or benefit that would provide an \$800 credit to reimburse the loss of a device owned prior to becoming a Verizon customer. If I was informed otherwise by two separate Verizon representatives during the sales process, please explain whether Verizon considers such representations to be inaccurate and whether Verizon has investigated the conduct of those representatives.

7- If both services were provided by Verizon to the same customer at the same address and during the same period, please explain why separate documentation and billing systems were utilized and why there is no consolidated account documentation.

8- After cancellation of my services, the amounts billed for internet services varied from month to month. Please explain the basis for those differing charges and provide supporting documentation.

9- If phone service billing is maintained separately, please explain why no records of phone service payments have been produced despite my requests.

10- Please confirm whether Verizon equipment, including gateways and related devices, may be returned directly to a local Verizon location rather than through shipment via UPS, and identify any policy governing such returns.

11- You have stated that Verizon will only provide documents that you believe I am entitled to receive and have declined to provide other records. Please identify the legal basis for withholding additional records relating to my account and explain why I am not entitled to review records relating to services purchased in my own name.

12- Because you have represented that certain documents will not be produced, please identify your role within Verizon and explain the basis upon which you determine which records may or may not be disclosed to customers.

13- Please confirm whether you have consulted with Verizon's legal department regarding this matter and, if so, whether the positions communicated to me were reviewed or approved by counsel.

14- Please explain why there is no documentation reflecting the billing disputes I repeatedly raised and produce all records concerning those disputes.

15- Please explain why I was provided a disputed billing case number that appears not to correspond to any actual dispute record and provide all documents relating to that matter.

16- on February 2, 2026, Verizon finally acknowledged receipt of my billing dispute after months of prior complaints. However, on the following day, I received a communication threatening referral to credit reporting agencies unless payment was made within approximately twenty-four hours. Please explain how those actions are consistent with Verizon's dispute-resolution procedures.

17- Verizon's authorized retailer is also a defendant in pending litigation relating to these matters. Please clarify whether Verizon is coordinating its defense, investigation, or responses with that retailer or whether Verizon considers itself entirely separate from that entity for purposes of responsibility and liability.

18- You have stated that phone insurance is provided only to customers who request it. Please identify whether such a request must be made in writing or whether verbal enrollment is permitted.

19- If a written request is required for enrollment in phone insurance coverage, please identify and produce the document establishing that requirement.

20- Please identify the names and positions of the two representatives involved in my purchase of the iPhone 16 Pro Max on or about May 17 and May 18, 2025.

21- Please identify the name and position of the representative involved in my cancellation of my services on July 5, 2025.

Thank you.

Sincerely,

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