



PIKE
REPORTING
COMPANY

CASE NO. 1:20-cv-03139-DDD
ALLSTATE INSURANCE COMPANY

V.

JOHN CRUZ

DEPOSITION OF:
RICHARD PODUSKA

DATE:
July 28, 2022



PIKE
REPORTING
COMPANY
YOUR PATH THROUGH LITIGATION



(855) 693-3767 | (720) 738-1300



schedule@yournextdepo.com

www.pikereporting.com

Richard Poduska, Allstate Executive, was subpoenaed. As an Allstate Executive representing Allstate in Federal Court.

Richard Poduska testified:

THE WITNESS: -- confidential information is anything that, you know, Allstate would deem proprietary: customer information, any documents that are Allstate branded, PowerPoint deccs, Gateway articles. Anything that is created by Allstate or any Allstate customer information.

MS. ARGENTINE: It's also, John, defined in the contract.

Q (BY MR. CRUZ) Uh-huh. And everything you have stated here can be referred to outside entities -- to refer business to outside entities through Allstate's representatives, Allstate agents?

Q (BY MR. CRUZ) Does Allstate still allow these agents that I've showed you, this confidential information of Allstate's, to still allow them to e-mail confidential information -- Allstate's confidential information

A **THE WITNESS:** I still don't think Allstate -- again, yeah

Q Is Erika Lousberg allowed to refer or broker business outside of Allstate?

A Simply put, is she allowed to? Yes

Q Do you have records of Allstate's quotes, Allstate's leads, Allstate's customers that have been referred to outside individuals?

A Oh, no.

Q No. And nobody keeps accounting records? Nobody you know of at Allstate keeps accounting records for quotes, leads, customers for gift cards, payments?

A Not that I'm aware of.

Deposition of Richard Poduska, 33:22-23, 48: 62:19-22