STATE OF MICHIGAN

COURT OF APPEALS

RUSSELL LOIOLA, a legally incapacitated person, by JEFFREY FRIED, Personal Representative,

UNPUBLISHED August 6, 2020

Plaintiff-Appellee,

v

CITIZENS INSURANCE COMPANY OF AMERICA,

Defendant,

and

CITIZENS INSURANCE COMPANY OF THE MIDWEST,

Defendant-Appellant.

Before: METER, P.J., and BECKERING and O'BRIEN, JJ.

BECKERING, J. (concurring).

I concur in the result only.

/s/ Jane M. Beckering

No. 348670 Washtenaw Circuit Court LC No. 16-001044-NF