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A&R BODY SPECIALTY, SKRIP'S AUTO BODY, FAMILY GARAGE and THE AUTO BODY ASSOCIATION OF CONNECTICUT on Behalf of Themselves and all Others Similarly Situated, Plaintiffs, - against - PROGRESSIVE INSURANCE GROUP COMPANY, PROGRESSIVE NORTHEAST INSURANCE COMPANY, PROGRESSIVE CASUALTY INSURANCE COMPANY, PROGRESSIVE DIRECT INSURANCE COMPANY, Defendants.

A&R BODY SPECIALTY v. PROGRESSIVE INS. GROUP CO.

Civil Action No .3:07CV929 WWE

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF CONNECTICUT

2007 U.S. Dist. Ct. Pleadings 866810; 2007 U.S. Dist. Ct. Pleadings LEXIS 22857

June 13, 2007

Complaint

[...*1] **I. INTRODUCTION**

1. This class action is brought by plaintiffs A&R Body Specialty, Skrip's Auto Body, Family Garage and the Auto Body Association of Connecticut ("ABAC"), by their attorneys, on behalf of themselves and all other licensed auto body repairers in the State of Connecticut who have performed repairs during the class period for any person with automobile insurance from Progressive Insurance Group, Progressive Northeast Insurance Company, Progressive Casualty Insurance Company, Progressive Direct Insurance Company (collectively "Progressive" or the "Company"). Plaintiffs seek to recover for the harm caused by Progressive in its consistent pattern of unfair and deceptive acts and practices in commerce within the State of Connecticut.

2. Progressive is a major nationwide insurer selling automobile insurance to thousands of Connecticut [*2] residents. In ...

... [*4] Avenue, Bridgeport, Connecticut, 06606. FG is licensed to perform automobile physical damage repair in the State of Connecticut. Family Garage has performed automobile physical damage repairs on damaged automobiles insured under Progressive policies and has been paid unreasonably low labor rates by Progressive. In addition, Progressive has improperly steered business away from Family Garage.

8. Plaintiff Auto Body Association of Connecticut ("ABAC") is a not-for-profit association of auto body shops, located at 2111 Dixwell Avenue, Hamden, Connecticut 06514. It is comprised of over one hundred automobile physical damage repair shops ...