

**IN THE DISTRICT COURT OF COMANCHE COUNTY
STATE OF OKLAHOMA**

FILED
DISTRICT COURT
COMANCHE COUNTY, OKLAHOMA
May 22, 2026 4:48 PM
ROBERT MORALES, COURT CLERK
Case Number CJ-2025-135

NEIL and LACY WEST,

Plaintiffs,

v.

STATE FARM FIRE AND CASUALTY
COMPANY and NANCY HOLCOMB INS.
AGENCY, INC.,

Defendants.

Case No. CJ-2025-135

JUDGE SHEPERD

**DEFENDANT STATE FARM FIRE AND CASUALTY COMPANY'S OPPOSED
MOTION FOR EXTENSION OF TIME TO COMPLY WITH DISCOVERY ORDER**

Defendant State Farm Fire and Casualty Company ("State Farm") respectfully submits this Opposed Motion for an Extension of Time to provide the discovery required by the Court's April 22, 2026 Order (the "Order"). Specifically, State Farm requests that the Court extend the deadline to produce responsive documents to July 30, 2026, an extension of 60 days from the June 1 date in the Court's Order. In support of its Motion, State Farm states as follows:

1. On April 22, 2026, the Court granted Plaintiffs' Motion to Compel in part, requiring State Farm to produce responsive documents by June 1, 2026 (the "Order"). Although the Order indicated that the Court Clerk would mail a copy to the parties, counsel for State Farm was not aware of and did not receive a copy of the Order until May 4, 2026 (and then from counsel for Plaintiffs). As a result, State Farm's time to comply with the Order was reduced by 12 days.

2. The Court's Order implicates, via the need to collect, review for responsiveness and produce, hundreds of thousands of documents over a six-and-a-half year period from the files of dozens of employees across numerous categories of information, including, *inter alia*, institutional communications, training materials, enterprise policies, and documents from State Farm's P&C Claims division. State Farm has been working diligently to collect, review, and

prepare documents for production in compliance with the Order and expects to make a substantial production consisting of tens of thousands of documents by the Court's June 1 deadline, including the prior productions from the *Nida*, *Hosier*, *Kyger*, *McDow*, *Barnett*, and *McNeil* matters.

3. Due to the breadth of Plaintiffs' Requests, however, State Farm anticipates that it will not complete its review of documents by June 1, 2026 and, through this Motion, requests an additional 60 days to complete its production, until July 30, 2026. State Farm anticipates that it will make rolling productions during this time period.

4. Despite State Farm's efforts, the work that remains is substantial given the volume and nature of the electronically stored information at issue. This work will include additional data collection, processing, review, and quality control measures prior to production. This high volume of documents has also required State Farm to engage a third-party vendor, Consilio, to assist with hosting, processing, reviewing, and producing documents in response to the Court's Order. An extension will permit State Farm to thoroughly complete these efforts.¹

5. While there is some overlap with other document productions on which State Farm is working, the requests are not entirely parallel, including time frames, and State Farm has to undertake the effort to ensure that it is gathering, reviewing for responsiveness and producing what has been ordered by this Court.

6. State Farm does not seek an extension for purposes of delay, but as a matter of necessity, given the extraordinarily high volume of documents and extensive efforts required to comply with the Court's Order. Notably, this extension will not be a source of individual delay or prejudice. Plaintiffs have on this same date filed a second motion to compel and are awaiting at

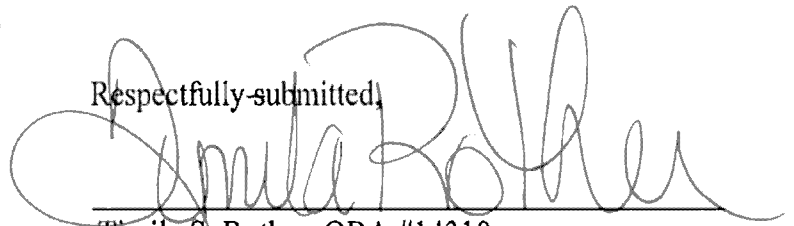
¹ State Farm is filing the current Motion without having had time to marshal time spent to date and cost in further support of this Motion. State Farm will work to have greater detail for a reply or at a hearing.

least partial document production before deposing Nicole Manduca as earlier ordered by the Court. Further, counsel for Plaintiffs has advised that they now want to depose the actual personnel involved in this claim and will provide dates; State Farm is waiting on those dates. In short, there is much discovery to complete apart from this production and Plaintiffs are seeking more.

7. Of note, State Farm has already produced all claim specific information long ago including the claim file, underwriting file and policy documents and so that information has long been available for use on case specific discovery.

WHEREFORE, Defendant State Farm Fire and Casualty Company respectfully requests the Court enter an order extending its deadline to comply with the Court's April 22, 2026 Order by 60 days from June 1 to July 30, 2026.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read 'Timila Rother', is written over a horizontal line.

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**ATTORNEYS FOR DEFENDANT STATE
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CERTIFICATE OF SERVICE

This is to certify that on the 22nd day of May, 2026, the undersigned caused a true and correct copy of the above and foregoing to be mailed to:

Reggie N. Whitten

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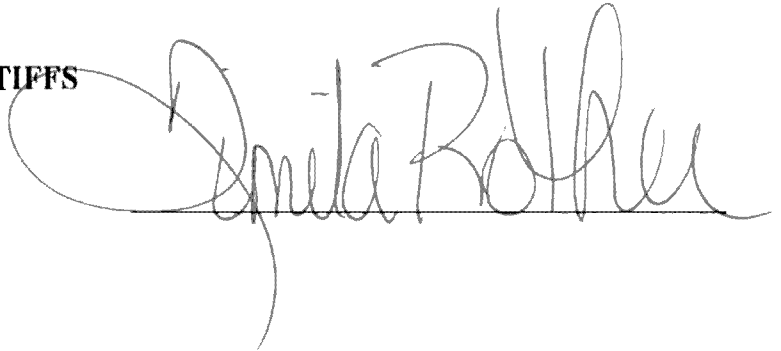
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ATTORNEYS FOR PLAINTIFFS

A handwritten signature in black ink, appearing to read "Anita R. Hightower", is written over a horizontal line. The signature is fluid and cursive, with a large loop at the beginning and a long, sweeping tail.