

v. United Parcel Serv., Inc., No. 17-CV-01202, 2018 WL 11237901, at *2–3 (D. Colo. Oct. 29, 2018) (finding that internal manuals were entitled to protection because defendant “would lose its competitive advantage if these manuals were publicly available—its competitors could replicate UPS’s methods and procedures, which it expended significant time and financial resources to develop.”); *Jones v. Nationwide Ins. Co.*, No. 3:98-CV-2108, 2000 WL 1231402 (M.D. Pa. July 20, 2000) (ordering that “all [produced] documentation, including all company policies and all claims manuals, are to be kept confidential, for the eyes of plaintiff’s counsel only”); *Toy v. State Farm Fire & Cas. Co.*, No. CV 23-4095, 2025 WL 1179459, at *4 (E.D. La. Apr. 23, 2025) (finding that “State Farm ha[d] established good cause for issuance of [a] protective order treating its claims handling policies, procedures and methodologies as confidential and limiting the[ir] use and disclosure . . . to purposes of this litigation”); *Moses Enters., LLC v. Lexington Ins. Co.*, No. 3:19-CV-00477, 2020 WL 7634165, at *3–4 (S.D.W. Va. Dec. 22, 2020) (finding that AIG’s insurance claims manuals were entitled to confidential treatment because “they provide very detailed, specific step-by-step instructions that AIG has developed regarding its property and casualty insurance claims”); *Hamilton v. State Farm Mut. Auto. Ins. Co.*, 204 F.R.D. 420, 423 (S.D. Ind. 2001) (finding State Farm’s claims handling policies, practices and procedures constitute trade secrets or otherwise confidential and proprietary information and issuing protective order governing their disclosure); *Jones v. Nationwide Ins. Co.*, No. 3:98-CV-2108, 2000 WL 1231402, at *4 (M.D. Pa. July 20, 2000) (ordering that “all [produced] documentation, including all company policies and all claims manuals, are to be kept confidential, for the eyes of plaintiff’s counsel only”); *Adams v. Allstate Ins. Co.*, 189 F.R.D. 331, 333-34 (E.D. Pa. 1999) (issuing protective order limiting use of claims handling material to that action).

2. State Farm produced Exhibit 3 at HOSIERGAR0073099PROD in *Hosier v. State*

Farm Fire & Casualty Co., No. CJ-2021-1741 (Okla. Cty.). In accordance with Paragraph 1 of the Protective Order entered in *Hosier* on Jan. 3, 2022, State Farm designated this document as Confidential. State Farm also produced the document at LYLEGAR00003873PROD in *Lyle v. State Farm Fire & Casualty Co.*, No. CJ-2024-183 (Cleveland Cty.) and designated it as Confidential in accordance with Paragraph 1 of the Protective Order the court entered in that case on April 3, 2025.

3. To respond to Plaintiff's characterization of Exhibit 3 which they have extrapolated from a brief and which State Farm contends is inaccurate, State Farm's Response discusses Exhibit 3 at pages 7-8. State Farm expressly reserves (and does not waive) the Confidentiality of that information, consistent with Paragraph 6 of the Protective Order, which provides: "In the event that any 'Confidential' material is used in any deposition, filing or court proceedings during the course of this litigation, it shall not lose its 'Confidential' status through such use." State Farm redacted this discussion in the publicly filed version of its Response and requests leave to file the unredacted version under seal.

4. To allow the Court time to decide on the present Application but preserve the Confidentiality of Exhibit 3, State Farm is filing its Response with a proposed redaction and with a placeholder for Exhibit 3. If the Court grants this Application, State Farm will re-file its unredacted Response and Exhibit 3 under seal. If the Court denies the Application, State Farm requests leave to amend its Response to the Second Motion to Compel to remove this Exhibit and the discussion of it.

5. Counsel for State Farm has conferred with counsel for Plaintiffs regarding this Application, and Plaintiffs' counsel has advised that it is opposed.

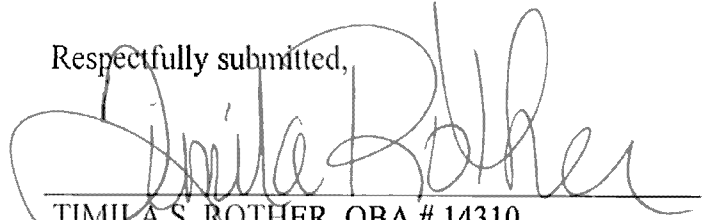
6. State Farm has attached a proposed Order for the Court's consideration as Exhibit

1.

CONCLUSION

State Farm respectfully requests the Court grant this Application and enter the proposed Order attached hereto as Exhibit 1.

Respectfully submitted,



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**ATTORNEYS FOR DEFENDANT STATE
FARM FIRE AND CASUALTY COMPANY**

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the above and foregoing was served by U.S. Mail, postage prepaid, this 8th day of June, 2026, to:

Reggie N. Whitten

Michael Burrage

Blake Sonne

Hannah Whitten

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Jake Denne

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Exhibit 1

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

NEIL & LACY WEST,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Case No. CJ-2025-135
	)	
STATE FARM FIRE & CASUALTY	)	
COMPANY and NANCY HOLCOMB INS.	)	
AGENCY, INC.,	)	
	)	
Defendants.	)	

**ORDER GRANTING DEFENDANT STATE FARM FIRE & CASUALTY COMPANY'S
APPLICATION TO FILE UNREDACTED RESPONSE TO PLAINTIFFS' SECOND
MOTION TO COMPEL AND EXHIBIT 3 UNDER SEAL**

Before the Court is Defendant State Farm Fire and Casualty Company's Opposed Application for Leave to File Unredacted Response to Plaintiffs' Second Motion to Compel and Exhibit 3 Under Seal pursuant to Paragraphs 6 and 12 of the Protective Order entered in this matter on May 4, 2026. Upon review of the Application, and for good cause shown, the Court GRANTS the Application.

IT IS THEREFORE ORDERED that State Farm may re-file an unredacted version of its Response to Plaintiffs' Second Motion to Compel and Exhibit 3 under seal by placing it in a sealed envelope or folder labeled "Contains Confidential Information – Subject to Court Order."

IT IS SO ORDERED this ___ day of June, 2026.

GRANT SHEPERD
DISTRICT COURT JUDGE

APPROVED: 

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