

1. State Farm is filing its Motion contemporaneously with the filing of the present Application. Exhibit 2 to State Farm’s Motion is the deposition transcript of Nicole Manduca. As previously briefed to this Court, Ms. Manduca was a claim consultant involved with the Fire Model Enhancement (“FME”) whose deposition was taken on June 23, 2026, the conduct of which by Plaintiffs’ counsel is the subject of this Motion. The Motion raises misconduct of counsel that permeated the deposition and thus the Motion cites to many pages of the deposition (though it quotes only a few). A substantial part of the deposition of Ms. Manduca quotes from or summarizes documents designated confidential under the Protective Order including on the

pages cited by State Farm to identify the issues prompting this Motion. State Farm had not yet completed its confidentiality designations of the transcript because it was not received until July 7 and State Farm has 30 days, until August 7, to make those designations. Therefore, out of a desire to provide the Court a full and fair picture of the questioning and interaction by providing the entire deposition and because even the specific pages to which State Farm cites include confidential information, State Farm here requests that it be permitted to file the deposition of Ms. Manduca under seal, or alternatively to submit it to the Court *in camera*.

2. The deposition contains and reflects State Farm’s confidential and proprietary claims handling policies, procedures and methodologies and is entitled to confidential protection. *See, e.g., Ortiz 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).

3. To allow the Court time to decide on the present Application but preserve the Confidentiality of Exhibit 2, State Farm is filing its Response with a placeholder for Exhibit 2. If the Court grants this Application, State Farm will re-file its Motion with a sealed Exhibit 2. If the Court denies the Application, State Farm requests leave to amend its Motion.

4. Counsel for State Farm asked counsel for Plaintiffs whether they object to this Application, but as of the filing had not received a response. However, given Plaintiffs’ pending Motion to (1) Strike Defendant State Farm’s Blanket Confidentiality Assertion, (2) De-Designate Documents Produced, and/or (3) to Lift the Protective Order for Good Cause Based on State Farm’s Failure to Engage in Good Faith as Required, counsel for State Farm anticipates that Plaintiffs do object.

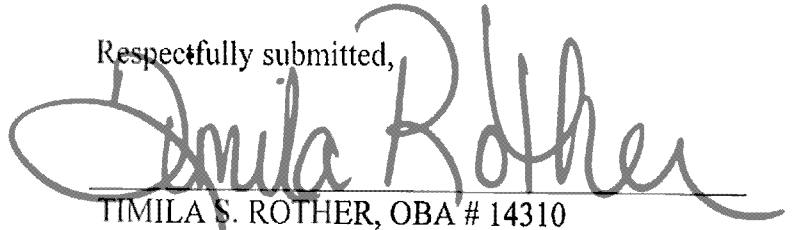
5. State Farm has attached a proposed Order for the Court’s consideration as Exhibit 1.

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
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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 27th day of July, 2026, to:

Reggie N. Whitten

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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 EXHIBIT 2 TO ITS MOTION FOR ENTRY OF A
PROTECTIVE ORDER AND DEPOSITION PROTOCOL
GOVERNING COUNSEL'S CONDUCT AT DEPOSITIONS UNDER SEAL**

Before the Court is Defendant State Farm Fire and Casualty Company's Application for Leave to File Exhibit 2 to its Motion for Entry of a Protective Order and Deposition Protocol Governing Counsel's Conduct at Depositions Under Seal. Upon review of the Application, and for good cause shown, the Court GRANTS the Application.

IT IS THEREFORE ORDERED that State Farm may file an unredacted version of Exhibit 2 to its Motion for Entry of a Protective Order and Deposition Protocol Governing Counsel's Conduct at Depositions 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 _____, 2026.

GRANT SHEPERD
DISTRICT COURT JUDGE

APPROVED:

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