



IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

SEP 30 2026

RICK WARREN
COURT CLERK

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BILLY & LACY HURSH,

Plaintiffs,

v.

STATE FARM FIRE AND
CASUALTY COMPANY; MARK D.
WELTY; and MARK D. WELTY
INSURANCE AGENCY, INC.,

Defendants.

Case No. CJ-2025-2626
Honorable Amy Palumbo

**PLAINTIFFS' APPLICATION FOR
LEAVE TO FILE UNDER SEAL**

Pursuant to 12 O.S. § 3226(C)(2), 51 O.S. §§ 24A.29 and 24A.30, Plaintiffs Billy and Lacy Hursh, respectfully submit their Unopposed Application for Leave to file an unredacted copy of Plaintiffs' Response in Opposition to Defendant State Farm's Amended Motion for Protective Order and to Quash Plaintiffs' Deposition Notice of State Farm's Operations Vice President Michael Keating and Counter Motion for Rule 4 Order, and Brief in Support, under seal. In support of this Application, Plaintiffs state:

1. Plaintiffs seek to file their Response and confidential exhibits thereto under seal. Plaintiffs' Response relies upon and references documents regarding the Defendants' discovery production.

2. Plaintiffs' request leave to file under seal an unredacted copy of their Response with a confidential Exhibits.

WHEREFORE, for the foregoing reasons, Plaintiffs Billy and Lacy Hursh, respectfully request the Court enter an order granting Plaintiffs' permission to file under seal an unredacted copy of Plaintiffs' Response in Opposition to Defendant State Farm's Amended Motion for

Protective Order and to Quash Plaintiffs' Deposition Notice of State Farm's Operations Vice President Michael Keating and Counter Motion for Rule 4 Order, in support of their Motion. A proposed order will be submitted herewith.

Respectfully submitted,



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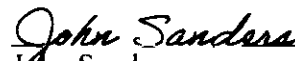
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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that on September 30, 2026, a true and correct copy of the foregoing document was delivered, via hand-delivery to all counsel of record for Defendants.

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