



IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

FILED IN DISTRICT COURT
OKLAHOMA COUNTY

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RICK WARREN
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128

BILLY & LACY HURSH,

Plaintiffs,

v.

Case No. CJ-2025-2626

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

Defendants.

**DEFENDANT STATE FARM FIRE AND CASUALTY COMPANY'S
MOTION TO PARTIALLY RECONSIDER THE COURT'S
SEPTEMBER 28, 2026, ORDER ON PLAINTIFFS' MOTION TO DE-DESIGNATE**

Defendant State Farm Fire and Casualty Company (“State Farm”) respectfully requests that the Court partially reconsider its September 28, 2026 Order compelling State Farm to de-designate certain documents that were attached to Plaintiffs’ Reply in Support of Motion to De-Designate (the “Order”). Specifically, State Farm requests that the Court modify its Order as to one of the eleven documents addressed in the Order, Ex. 12 (HUR00061156–76) (the “Exhibit”) to partially, rather than fully, de-designate that Exhibit.

INTRODUCTION AND SUMMARY

State Farm’s request is narrow. While State Farm respectfully disagrees that the eleven documents de-designated by the Court’s one-sentence, summary Order are not entitled to confidentiality protection, State Farm is only moving to reconsider the Court’s ruling as to **specific portions** of **one** de-designated document (the Exhibit). Specifically, Pages 3 through 21 (HUR00061158–76) of the Exhibit (the “Confidential Pages”) contain numerous pieces of detailed, relatively recent reinspection data and trends and forward-looking strategic information and reports prepared in mid-2025 that would cause competitive harm if disclosed today. These pages fall squarely within the definition of “commercial information” in the applicable Protective Order (“PO”) and are precisely the type of information that protective orders are designed to protect, and that courts across the country routinely treat as confidential. Moreover, maintaining the confidentiality of these pages will do nothing to prejudice Plaintiffs or delay resolution of this case. Plaintiffs will retain the ability to use the Exhibit during depositions, briefs, and hearings, provide the Exhibit to any individual authorized under the PO, and otherwise litigate their case, without any redaction or other obfuscation that would render the Exhibit unreadable. Thus, the Court should reconsider its Order in relation to the Confidential Pages, apply the plain language of its PO, and confirm the Confidential Pages’ confidentiality.

ARGUMENTS AND AUTHORITIES

I. STANDARD FOR RECONSIDERATION.

A district court has the authority to reconsider, modify, or clarify an interlocutory, non-appealable order any time prior to entering final judgment. *See Kordis v. Kordis*, 2001 OK 99, ¶ 9, 37 P.3d 866, 870 (citing *Reams v. Tulsa Cable Television, Inc.*, 1979 OK 171, 604 P.2d 373). “[T]he trial court is not bound by, and may hence reconsider, all of its mid-litigation rulings at any time before the case comes to an end.” *Conterez v. O’Donnell*, 2002 OK 67, 58 P.3d 759, 761–62. Similarly, 12 Okla. Stat. § 994 provides that an interlocutory order is “subject to revision at any time before the final judgment . . . is filed with the court clerk.” Here, the Order does not adjudicate all the claims and is thus an interlocutory order that the Court may reconsider or modify in its discretion.

II. THE CONFIDENTIAL PAGES ARE ENTITLED TO CONFIDENTIALITY PROTECTION UNDER THE PO.

Under the PO, “[c]onfidential research, development or commercial information” is defined as “information that is maintained in secrecy from third Parties and which a party in good faith believes would result in substantial competitive harm if publicly disclosed.” The information in the Confidential Pages satisfies this standard.

A. The Confidential Pages are Maintained in Secrecy From Third Parties.

The information in the Confidential Pages—which includes reinspection data, reinspection reports, estimated financial information, and discussions of reinspection trends—has never been disclosed outside State Farm except where required by law under the protection of Protective Orders. Moreover, the record reflects that State Farm takes appropriate measures to keep this information secret from third parties. Declaration of Kevin Mosby ¶¶ 24–37, attached hereto as Exhibit 1.

First, only a small, defined group of State Farm personnel received the reports in the Confidential Pages. Specifically, as part of their work on State Farm's Quality Pillar, a small number of State Farm employees prepared the May 2025 report that starts on page three (HUR00061158) in preparation for transmission to another small group of senior State Farm employees ahead of an internal meeting. Ex. 12 at HUR00061157. The April 2025 report that starts on pages 11–21 was likewise sent solely to three named State Farm recipients and copied to members of the same internal drafting team. *Id.* at HUR00061166. Neither report was distributed to policyholders, vendors, or the general public. Mosby Decl. ¶ 25.

Second, the Confidential Pages contain express confidentiality legends. For example, the email chain bears language stating that the content is “FOR INTERNAL STATE FARM USE ONLY” and “[c]ontains information that may not be disclosed outside State Farm without authorization.” Ex. 12 at HUR00061157. Both Peril over Year Comparison charts are identified as “Draft,” and the Water Reconciliation Unit plan graphics embedded in both reports carry similar internal-use-only and confidential legends and are also marked “DRAFT.” *Id.* at HUR00061162, HUR00061171.

Third, State Farm does not publish the reinspection data, reinspection trends, and related reports contained in the Confidential Pages in any public filing, marketing material, or public statement. Mosby Decl. ¶ 26. Instead, the underlying data comes from internal reinspection and quality-review systems and dashboards accessible only to authorized State Farm personnel. *Id.* at ¶ 27. Access to aggregated reinspection data and trends, including related reports such as the ones in the Confidential Pages, is strictly limited. *Id.* at ¶ 28. Only Claim Managers and positions above them have access to this information. No individuals who have claim settlement authority have access to this information, and Section Managers and Team Managers can only view limited

subsets of this information related to their individual team members. *Id.*

Finally, State Farm has implemented several policies and practices to further safeguard sensitive information like the reinspection data, reinspection trends, and related reports. For example, State Farm advises all employees about its Code of Conduct, which includes an obligation to protect and not reveal proprietary information, including after termination. *Id.* at ¶¶ 29–30. State Farm also has an Enterprise Information Security Policy (“EISP”) that restricts access to sensitive materials to persons who have a business need to use them in order to perform their duties on behalf of State Farm, which includes, among other things, an access approval standard, an access review standard, and an access removal standard and sets forth limitations on how employees can handle such materials. *Id.* at ¶¶ 31–35. And to the extent reinspection data, reinspection trends, and related reports are sought in litigation, State Farm requires that they only be produced subject entry of an appropriate protective order. *Id.* at ¶ 37. As such, there is no question that the first element of the PO is met.

B. State Farm Believes in Good Faith That Public Disclosure of the Confidential Pages Would Cause Substantial Competitive Harm

The Confidential Pages are not generic descriptions of claim handling from long ago. They are a detailed, quantified, and forward-looking picture from just over a year ago (mid-2025) of how State Farm measures the accuracy of its property claim handling, what those measurements show, where State Farm sees its own areas for improvement, and what it is doing or intends to do operationally and technologically to address the accuracy of its claim handling. The Confidential Pages cover data through April and May 2025, compare them to forecasts for the current year, and describe initiatives that are ongoing. *See, e.g.,* Ex. 12 at HUR00061159, HUR00061165. This is not stale historical information whose competitive value has dissipated.

Each category of information contained in the Confidential Pages would give competitors, vendors, and other market participants in the highly competitive insurance industry insight they could not otherwise obtain, and that State Farm has invested substantial resources to develop and takes steps to protect. Mosby Decl. ¶¶ 8–23. Additional details about the precise timeline and efforts undertaken can be found in the attached declaration of Kevin Mosby, but in total, State Farm’s *initial* development, refinement, and implementation of the reinspection program took almost three years and involved thousands of man-hours from a team that varied between six to eight people. *Id.* at ¶¶ 8–14. Moreover, State Farm continues to monitor and refine the reinspection program and FED. *Id.* at ¶ 14. As such, State Farm has a good faith belief that public disclosure of this information would cause substantial competitive harm.

1. Proprietary quality-measurement methodology and data. The Confidential Pages reflect State Farm’s internal framework for assessing claim accuracy based on its reinspection program including Fire Estimatic Difference (“FED”), which is a proprietary comparative analysis of estimate dollars as calculated during the reinspection process and estimate dollars written. *Id.* at ¶4. In the Confidential Pages, the FED is broken down by peril (water, hail, wind, and fire) and by question type (coverage, estimatics, and reconciliation). Ex. 12 at HUR00061158–59; HUR00061166–67. They also reveal State Farm’s internal taxonomy of reinspection finding codes and the counts and dollar values associated with each, along with trade-category breakdowns. *Id.* at HUR00061160–61, HUR00061164, HUR00061169–70, HUR00061172–75. Consequently, disclosure would give competitors a ready-made template for designing their own reinspection programs, along with benchmark data against which to measure their own performance, without incurring the costs State Farm incurred to build its programs. Mosby Decl. ¶ 18.

2. Internal financial estimates, forecasts, and plan-versus-actual data. The Confidential Pages quantify “Potential Net Paid Indemnity” by peril and question type for both 2024 and 2025 as an extrapolation from the reinspection FED data. Ex. 12 at HUR00061158–59. They also disclose State Farm’s internal forecasts for each estimate and whether the forecasts were accurate. *Id.* at HUR00061160, HUR00061162–63, HUR00061165, HUR00061171. For example, the Water Reconciliation Unit plan graphics disclose State Farm’s 2025 reconciliation-dollar plan, actual results, referral-volume plan, and actual volume. *Id.* at HUR00061162, HUR00061171. Internal forecasts and plan-versus-actual data are classic confidential commercial information. *See, e.g., Hadley v. Kellogg Sales Company*, No. 16-CV-04955-LHK, 2019 WL 12495009, at *2 (N.D. Cal. Dec. 12, 2019) (finding that “giving competitors access to reports that a litigant has spent time and energy conducting would give would provide competitors ‘with an enormous benefit—to [the litigant’s] detriment’” and sealing an exhibit that revealed “information about [the defendant’s] business strategies and plans for future products.”) (quoting *Apple Inc. v. Samsung Elecs. Co.*, 727 F.3d 1214, 1226, 1228 (Fed. Cir. 2013)); *Bral Environmental Services, Inc. v. Shaw Environmental, Inc.*, No. 03-2300-JW, 2003 WL 22843180 (D. Kan. Oct. 23, 2003)(finding confidential, among other things, “all documents and information relating to . . . business plans or forecasts; financial plans and forecasts, operational plan and forecasts”). Their disclosure would reveal how State Farm budgets and areas where its operations are over- or under-performing, which competitors can then use (to State Farm’s disadvantage) in pricing, product, and market decisions. Mosby Decl. ¶ 21.

3. Operational capacity, workflow parameters, and service-level data. The Confidential Pages disclose the dollar thresholds and eligibility parameters for State Farm’s specialized fire estimate review, monthly volumes of eligible and submitted estimates,

acknowledgement and acceptance rates, and service-level performance, including volume surge and average delivery times. Ex. 12 at HUR00061159, HUR00061165–66, HUR00061168, HUR00061176. They also disclose State Farm’s internal decisions relating to review timing and the adjustment of settlement authority in five specifically identified states. *Id.* at HUR00061160, HUR00061168–69. This information reveals how State Farm allocates resources, staffs its review functions, and structures internal controls based on FED. Consequently, competitors could use it to understand and replicate State Farm’s operating model to their own competitive benefit, allowing them to identify periods and markets where State Farm’s capacity is strained. Mosby Decl. ¶ 22.

4. Centralized Fire Estimatics Unit (“CFEU”) information. The Confidential Pages disclose information about the CFEU and its operation. Ex. 12 at HUR00061159, HUR00061165–66, HUR00061168, HUR00061173, HUR00061175–76. The CFEU is a specialized internal department at State Farm that reviews and analyzes estimates and provides its findings to claims analysts to facilitate claims accuracy, which is unique to State Farm. Mosby Decl. ¶ 6. Disclosure would, among other things, provide competitors information about its existence and operation and allow them to improve the measurement and accuracy of their own claims handling, to their competitive advantage and State Farm’s competitive disadvantage. *Id.* at ¶ 16.

Finally, when taken together, the Confidential Pages constitute a competitively sensitive compilation. Even if any particular data point, standing alone, might appear modest, the assembled picture of State Farm’s quality-measurement methodology, forecasts, operational parameters, geographic weak points, and strategic responses makes the Confidential Pages extremely valuable to a competitor, and their disclosure substantially harmful as a result. *See, e.g., Gann v. Gen. Motors LLC*, 2022 WL 3552484, at *1, 4 (D. Ariz. Aug. 18, 2022) (finding persuasive defendant’s

argument that documents “cannot be examined in a vacuum” and that the disclosure of cumulative information can create competitive harm even if each individual piece of information might not, and granting defendant’s motion for protective order); *Compulife Software Inc. v. Newman*, 959 F.3d 1288, 1314 (11th Cir. 2020) (“Even granting that individual quotes themselves are not entitled to protection as trade secrets, the magistrate judge failed to consider the important possibility that so much [information] was taken—in a bit-by-bit fashion—that a protected portion of the trade secret was acquired.”). Thus, State Farm’s good faith belief that public disclosure would cause substantial competitive harm is justified, the second required element for confidentiality under the PO is met, and reconsideration in relation to the Confidential Pages is warranted.

III. RETAINING CONFIDENTIALITY OVER THE CONFIDENTIAL PAGES WILL NOT PREJUDICE PLAINTIFFS OR DELAY RESOLUTION OF THIS MATTER.

Confidential designations do nothing to limit Plaintiffs’ use of the Exhibit in this litigation. Plaintiffs may use the entirety of the Exhibit—including the Confidential Pages—in depositions, in motion practice, and—subject to the Court’s procedures—at trial. This is exactly what the Oklahoma Discovery Code intends: dissemination of confidential commercial information is prohibited outside a specific case, but the litigants in that case remain able to use it as necessary within the litigation. As such, keeping the Confidential Pages confidential will neither prejudice Plaintiffs nor delay the resolution of this matter.

CONCLUSION

WHEREFORE, State Farm respectfully requests that the Court partially vacate its September 28, 2026 Order, and confirm that pages three through twenty-one of Ex. 12 to Plaintiffs’ Reply in Support of Motion to De-Designate (HUR00061158–76) are confidential.

Respectfully submitted,



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CERTIFICATE OF MAILING

I do hereby certify that on October 14, 2026, a true, correct and exact copy of the above and foregoing document was served by placing same in the United States mail, with proper postage thereon duly prepaid, to those parties as listed below:

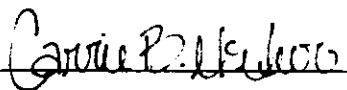
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**IN THE DISTRICT COURT OF OKLAHOMA COUNTY
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BILLY & LACY HURSH,

Plaintiffs,

v.

STATE FARM FIRE & CASUALTY COMPANY;

MARK D. WELTY; and MARK D. WELTY

INSURANCE AGENCY, INC.,

Defendants.

Case No. CJ-2025-2626

DECLARATION OF KEVIN MOSBY

I, Kevin Mosby, hereby certify, under penalty of perjury, that the following is true and correct:

1. I am over the age of 21 years, of sound mind, legally capable of making this Declaration, and have personal knowledge of the facts contained in this Declaration.

2. I am employed by State Farm Fire and Casualty Company ("State Farm") as a Staff Consultant. I have personal knowledge of the matters stated herein and, if called as a witness, could competently testify thereto.

3. I have reviewed the document produced in the above-referenced case at Bates numbers HUR00061156-76. The document contains an email chain with embedded reports that include reinspection data, estimated financial information, and discussions of reinspection trends on pages 3 through 21 (the "Confidential Pages") that would cause competitive harm if disclosed.

I. The Information in the Confidential Pages is Valuable and Unique to State Farm.

4. The reinspection data, reinspection trends, and related reports in the Confidential Pages reflect State Farm's internal framework for assessing claim accuracy based on its reinspection program, including Fire Estimatic Difference ("FED"), which is a proprietary

EXHIBIT

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comparative analysis of estimate dollars as calculated during the reinspection process and estimate dollars written.

5. The Confidential Pages also reveal State Farm's internal taxonomy of reinspection finding codes and the counts and dollar values associated with each, along with trade-category breakdowns.

6. In addition, the Confidential Pages reveal information about State Farm's Centralized Fire Estimatics Unit ("CFEU"), which is a specialized internal department that reviews and analyzes estimates and provides its findings to claims analysts to facilitate claims accuracy. I am not aware of any competitors who have a specialized department like the CFEU.

7. State Farm's reinspection program and the related data, reports, and CFEU are unique and valuable to State Farm for the reasons set forth in this declaration and reflect proprietary investigation, analysis, and results.

II. State Farm Spent (and Continues to Spend) Significant Time and Resources Developing, Refining, and Implementing its Reinspection Process.

8. I had, and continue to have, primary responsibility for overseeing the development, refinement, and implementation of the reinspection program and FED at State Farm. Based on this personal knowledge and experience, State Farm has invested substantial resources in developing, implementing, maintaining, and improving its reinspection program and FED.

9. Initial development of the reinspection program and FED took a dedicated team that varied between six and eight people approximately nine months. During the first four months of this development, I spent approximately 85–90% of my time working solely on this project. In the same time frame, at least two other State Farm employees spent the entirety (100%) of their time working solely on this project.

10. Consequently, during this initial four-month period alone, State Farm expended at least 1,760 man-hours on this project, just counting the work I and two other employees did, without accounting for the work done by other members of my team.

11. After the initial development was completed, State Farm continued to refine the reinspection program and FED for approximately another year to ensure it was working correctly and that the data that was credible. During this time, I was spending approximately 25–50% of my time (approximately ten to twenty hours per week) working solely on this project. Other State Farm employees continued to assist as well.

12. After the initial refinement period began producing credible data, State Farm began implementing the reinspection program and FED, while continuing to refine it, including developing and conducting education sessions on what FED is, how it was developed, and how it should be used. This implementation/refinement period lasted approximately another year. During this implementation/refinement period, I continued to spend approximately 25–50% of my time (approximately ten to twenty hours per week) working solely on this project.

13. In total, State Farm's development, refinement, and implementation of the reinspection program took almost three years and involved thousands of man-hours.

14. State Farm continues to monitor and refine the reinspection program and FED.

III. The Information in the Confidential Pages Would be Valuable in the Industry

15. The insurance industry in the state of Oklahoma and throughout the United States is highly competitive. Accordingly, insurers do not disclose information about their claims-handling procedures, techniques, processes, methods, systems, policies and related programs to the general public or one another.

16. Because the information in the Confidential Pages is not publicly available, public disclosure would provide competitors insights and information that they would not otherwise have

and which they can then use to improve the measurement and accuracy of their own claims handling, to their competitive advantage and State Farm's competitive disadvantage.

17. If competitors were to obtain the information in the Confidential Pages, they would receive the benefit of State Farm's substantial work, time, and costs at no cost to themselves. This would especially benefit insurers that do not have the resources to develop their own reinspection program. Such insurers would be able to simply copy and adopt State Farm's confidential program, and the unique value of the reinspection program to State Farm would be impaired.

18. Release of State Farm's confidential information surrounding the reinspection program would also provide competitors with a ready-made template for designing their own reinspection programs, along with benchmark data against which to measure their own performance, thereby causing irreparable injury to State Farm and the loss of a business advantage.

19. At a minimum, the competitor's development time and cost to build a reinspection program would be greatly reduced if it had access to State Farm's confidential information. The competitor would realize substantial cost savings and thereby gain an unfair advantage without properly compensating State Farm for the expenses it incurred in developing the program.

20. Public disclosure of the information in the Confidential Pages could also cause competitive harm to State Farm by revealing to competitors and bad actors the capabilities of State Farm's reinspection program. Information about how State Farm assesses claim accuracy, if made public, would make it easier for malicious actors to file fraudulent claims and evade detection from State Farm.

21. Public disclosure of the internal forecasts and plan-versus-actual data in the Confidential Pages would reveal how State Farm budgets and areas where its operations are over-

or under-performing, which competitors can then use (to State Farm's disadvantage) in pricing, product, and market decisions.

22. Competitors could use the information in the Confidential Pages about how State Farm allocates resources, staffs its review functions, and structures internal controls based on FED to understand and replicate State Farm's operating model to their own competitive benefit, allowing them to identify periods and markets where State Farm's capacity is strained.

23. The loss of State Farm's competitive edge over its competitors based on these disclosures would lead to decreased revenue and reduced financial performance, in addition to wasting State Farm's prior substantial investments in the development, refinement, and implementation of the reinspection process.

IV. State Farm Maintains Robust Measures to Ensure the Confidentiality of This Information.

24. State Farm considers its reinspection program to be among its important assets. Accordingly, State Farm has been and remains vigilant about ensuring the confidentiality of the reinspection program through several methods.

25. First, State Farm limits and controls access to its sensitive information and documentation. The reinspection data, reinspection trends, and related reports referenced in the Confidential Pages are not distributed to policyholders, vendors, or the general public.

26. State Farm does not publish the reinspection data, reinspection trends, and related reports in any public filing, marketing material, or public statement.

27. The underlying data comes from internal reinspection and quality-review systems and dashboards accessible only to authorized State Farm personnel on the claim analytics team.

28. Access to aggregated reinspection data and trends, including related reports such as the ones in the Confidential Pages, is strictly limited. Only Claim Managers and positions above

them have access to this information. No individuals who have claim settlement authority have access to this information, and Section Managers and Team Managers can only view limited subsets of this information related to their individual team members (i.e., they can view the FED for a specific claim). They cannot view aggregated data for their teams or sections.

29. Additionally, all employees are advised in the Code of Conduct that the obligation to protect and not reveal proprietary information continues after they leave State Farm. The 2026 Code of Conduct contains the following language:

Intellectual Property and Confidential Information:

Information is an asset, and we must protect it from unauthorized or improper use. Types of information include trade secret, confidential, internal use only, and privileged, and each type needs to be protected on various levels. Intellectual property can include patents, copyrights, trade secrets, customer lists, business models and marketing plans, as well as claim information, contractual obligations and information developed for internal use. Any intellectual property developed while performing work for, or on behalf of, the Company, or while using Company resources, equipment, time or information belongs to the Company.

As employees we must safeguard Company information from unauthorized disclosure or use, and must not use Company information for our benefit or that of others. When we leave the Company, we must return any information, and the obligation not to disclose or use such information continues after we leave.

30. The Code of Conduct prohibits State Farm employees from disclosing the reinspection data, reinspection trends, and related reports to outside sources.

31. State Farm also has an Enterprise Information Security Policy ("EISP") that restricts access to sensitive materials like the reinspection data, reinspection trends, and related reports to persons who have a business need to use them in order to perform their duties on behalf of State Farm.

32. For example, the EISP sets forth an "Access Approval Standard," which requires that internal employees only be provided access to sensitive information when such information is

required for their job duties and when they have been assigned a unique user ID and verifier. To the extent external associates need access to such materials, the EISP requires them to sign an appropriate "access agreement" prior to being provided the materials.

33. The EISP also contains an "Access Review Standard," which requires management to evaluate their direct reporting associate's system access privileges at least annually, and more often if there is a change in their job responsibilities, their levels of access granted, or the sensitivity of the information to which they have access.

34. Similarly, the EISP contains an "Access Removal Standard," which requires management to ensure there is a defined and documented procedure for removing access to sensitive information under appropriate circumstances. Upon termination of an employee, all access to sensitive materials is terminated as well. Additionally, State Farm ensures the return of items such as laptop computers, identification cards, and keys to State Farm.

35. Once granted access to sensitive information, State Farm's EISP outlines a number of limitations on how an employee may handle such information so as to protect the confidentiality and integrity of State Farm's sensitive information. For instance, the EISP requires that electronically stored trade secret information be secured in a manner to prevent inadvertent disclosure of such information. For employees with access to the reinspection data, reinspection trends, and related reports, the EISP requires them to, among other things: (a) keep the information encrypted at rest and in transit; (b) conduct a risk assessment before utilizing such data; (c) utilize tape logs (or other technology) to monitor electronic data sets; (d) shield their monitors and employ a screen lock to prevent unauthorized viewing; (e) secure any hard copies, keep them out of sight, and prevent anyone without proper access and a business need from viewing them; (f) secure

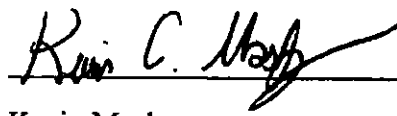
mobile devices from unauthorized exposure and access; and (g) ensure that all hardware and electronic media undergo data eradication before being released to any outside parties.

36. All of State Farm's procedures in the EISP and Code of Conduct are therefore aimed at preventing inadvertent disclosure of information like the reinspection data, reinspection trends, and related reports to unauthorized parties. In the rare instance where there is a need for a non-State Farm employee to view such documents, the EISP and other protocols require that those parties enter into an appropriate contract beforehand.

37. State Farm also limits and controls access to the reinspection data, reinspection trends, and related reports in the context of litigation by requiring that this information be produced subject to a protective order. As such, I understand that State Farm instructs its counsel to seek the entry of appropriate protective orders. I am unaware of any litigation wherein State Farm produced reinspection data, reinspection trends, or related reports without a protective order or a Court-order compelling production.

I state under penalty of perjury that the foregoing is true and correct.

SIGNED this 9th day of October, 2026.



Kevin Mosby