



IN THE DISTRICT COURT OF OKLAHOMA COUNTY OCT 19 2026
STATE OF OKLAHOMA

RICK WARREN
COURT CLERK

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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

STATE FARM'S APPLICATION FOR LEAVE TO FILE UNREDACTED
MOTION TO RECONSIDER AND STAY THE COURT'S
OCTOBER 1, 2026 MINUTE ORDER AND EXHIBITS 2, 3 AND 4 UNDER SEAL

In accordance with 12 O.S. § 3226(C)(2) and 51 O.S. § 24A.29, and Paragraphs 6 and 12 of the Protective Order this Court entered on December 11, 2025, Defendant, State Farm Fire and Casualty Company ("State Farm") hereby submits this application for a Temporary Order to file Motion to Reconsider and Stay the Court's October 1, 2026 Minute Order and Exhibits 2, 3 and 4 Under Seal ("Motion and Exhibits"). In support hereof, State Farm states as follows:

1. State Farm filed its Motion and Exhibits, less Exhibit 2, with redactions on October 15, 2026. The Motion and Exhibits 2, 3, and 4 confidential information. Exhibit 2 is an internal memo covering State Farm's proprietary information and Exhibits 3 and 4 are transcripts, portions of which have been redacted because they discuss that memo. The documents contain and reflect State Farm's confidential and proprietary claims handling policies, procedures and methodologies and is entitled to confidential protection. *See, e.g., Ortez 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 (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 (E.D. Pa. 1999) (issuing protective order limiting use of claims handling material to that action).

2. To allow the Court time to decide on the present Motion but preserve the Confidentiality of the Motion and Exhibits, State Farm filed its Motion and Exhibits, less Exhibit 2, with redactions and a placeholder for Exhibit 2. State Farm has submitted to the Court and served on counsel of record full copies of its unredacted Motion and Exhibits, including Exhibit

2. If the Court grants this Application, State Farm will re-file its unredacted Motion and Exhibits.

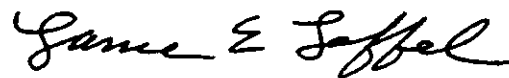
3. Plaintiffs object to this Application.

4. State Farm has attached a proposed Temporary Order for the Court's consideration as Exhibit 1.

CONCLUSION

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

Respectfully submitted,



Lance E. Leffel, OBA No. 19511
David R. Herber, OBA No. 33527
GABLEGOTWALS
BOK Park Plaza
499 W. Sheridan Ave., Suite 2200
Oklahoma City, OK 73102
(405) 235-5500
(405) 235-2875 Fax
llefel@gablelaw.com
dherber@gablelaw.com

-and-

Carrie B. McNeer, OBA No. 22235
Grant A. Fitz, OBA No. 19806
Nathan A. Miramontes, OBA No. 36212
GABLEGOTWALS
110 N. Elgin Avenue
Suite 200
Tulsa, OK 74120-1490
(918) 595-4800
(918) 595-4990 Fax
cmcneer@gablelaw.com
gfitz@gablelaw.com
nmiramontes@gablelaw.com

Diane Lee McGimsey -*Admitted Pro Hac Vice*
SULLIVAN & CROMWELL

1888 Century Park
East, Suite 2100, Los Angeles, CA 90067
PH: 310-712-6600
mcgimseyd@sullcrom.com

Erica B. Zolner -*Admitted Pro Hac Vice*
REDGRAVE LLP
230 West Monroe Street, Suite
210, Chicago, IL 60606
PH: 773-720-9169
ezolner@redgravellp.com

Tiffany Lynne Powers -*Admitted Pro Hac Vice*
ALSTON & BIRD, LLP
1201 West Peachtree Street NW,
Atlanta, GA 30308
PH: 404-881-7000
Tiffany.powers@alston.com

Samuel J. Park -*Admitted Pro Hac Vice*
Alston & Bird, LLP
350 S. Grand Ave., 51st Floor
Los Angeles, CA 90071
PH: 213-576-1000
Samuel.Park@alston.com

***Attorneys for Defendant
State Farm Fire and Casualty Company***

CERTIFICATE OF MAILING

I do hereby certify that on October 19, 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:

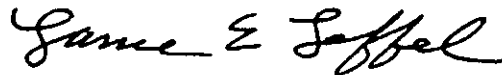
Reggie N. Whitten
Michael Burrage
Blake Sonne
Hannah Whitten
John S. Sanders
Jake Denne
WHITTEN BURRAGE
512 North Broadway Avenue, Suite 300
Oklahoma City, OK 73102
rwhitten@whittenburrage.com
mburrage@whittenburrage.com
bsonne@whittenburrage.com
hwhitten@whittenburrage.com
jsanders@whittenburrage.com
jdenne@whittenburrage.com

R. Ryan Deligans,
Durbin, Larimore & Bialick
920 North Harvey
Oklahoma City, OK 73102
rdeligans@dlb.net

Patrick F. Colloghan
BIBY LAW FIRM
6305 E. 120th Ct., Suite F
Tulsa, OK 74137
pat@bibylaw.com

Lloyd "Trey" Duck
Andrew Pate
NIX PATTERSON, LLP
512 N. Broadway Ave., Ste. 200
Oklahoma City, OK 73102
tduck@nixlaw.com
dpate@nixlaw.com

Attorneys for Plaintiffs



Lance E. Leffel