FILED IN DISTRICT COURT
OKLAHOMA COUNTY

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IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

NOV - 9 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 Fire and Casualty Company's Motion for a Protective Order and to Quash Plaintiffs' Deposition Notice of State Farm's Corporate Representative, 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 from the Defendants' discovery production and references lines of deposition testimony from deposition(s) that State Farm has designated certain portions of as confidential.[1]

[1] In filing a redacted version and seeking leave to file an unredacted version of the Response and exhibits thereto under seal and pursuant to the confidentiality designations submitted by State Farm, Plaintiffs do not concede and/or admit that the documents and lines of testimony designated by State Farm are confidential. Rather, Plaintiffs hereby fully reserve the right to challenge all documents and lines of deposition testimony designated as confidential by State Farm.

2. Plaintiffs' request leave to file under seal an unredacted copy of their Response with confidential exhibits in support thereof.

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 Fire and Casualty Company's Motion for a Protective Order and to Quash Plaintiffs' Deposition Notice of State Farm's Corporate Representative, and Brief in Support, in support of their Motion. A proposed order will be submitted herewith.

Respectfully submitted,



Reggie N. Whitten, OBA No. 9576
Michael Burrage, OBA No. 1350
Blake Sonne, OBA No. 20341
Hannah Whitten, OBA No. 35261
John S. Sanders, OBA No. 34990
Jake Denne, OBA No. 35097
WHITTEN BURRAGE
512 North Broadway Avenue, Suite 300
Oklahoma City, OK 73102
Office: 405.516.7800
Facsimile: 405.516.7859
rwhitten@whittenburragelaw.com
mburrage@whittenburragelaw.com
bsonne@whittenburragelaw.com
hwhitten@whittenburragelaw.com
jsanders@whittenburragelaw.com
jdenne@whittenburragelaw.com

Patrick F. Collogan, OBA #30529
Biby Law Firm
6305 E. 120th Ct., Suite F
Tulsa, OK 74137
918-574-8458
888-572-8263 (fax)
pat@bibylaw.com

R. Ryan Deligans, OBA #19793
Andrew M. Gunn, OBA #19470
920 North Harvey
Oklahoma City, OK 73102-2610
Telephone: (405)235-9584
Facsimile: (405)235-0551
rdeligan@dlb.net
agunn@dlb.net

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

CERTIFICATE OF SERVICE

I hereby certify that on November 9, 2026, a true and correct copy of the foregoing document was delivered, via hand-delivery to all counsel of record for Defendants.

Carrie McNeer Grant A. Fitz GABLEGOTWALS 110 N. Elgin Avenue Suite 200 Tulsa, OK 74120-1490 (918) 595-4800 (918) 595-4990 (fax) cmcneer@gablelaw.com gfitz@gablelaw.com -and- Lance E. Leffel GABLEGOTWALS BOK Park Plaza 499 W. Sheridan Ave. Suite 2200 Oklahoma City, OK 73102 lleffel@gablelaw.com (405) 235-5500 (405) 235-2875 (fax) 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 Kristin A. Shepard - *Admitted Pro Hac Vice* Alston & Bird, LLP 950 F Street, NW Washington, DC 20004 PH: 202-239-3277 Kristin.Shepard@alston.com **ATTORNEY FOR DEFEENDANT STATE FARM FIRE AND CASUALTY**

John Sanders