IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION

UNITED STATES OF AMERICA ex rel.;
CORI RIGSBY; AND KERRI RIGSBY — RELATORS/COUNTER-DEFENDANTS

v. — CASE No. 1:06-cv-433-LTS-RHW

STATE FARM MUTUAL
INSURANCE COMPANY — DEFENDANT/COUNTER-PLAINTIFF

and

FORENSIC ANALYSIS
ENGINEERING CORPORATION;
EXPONENT, INC.;
HAAG ENGINEERING CO.;
JADE ENGINEERING;
RIMKUS CONSULTING GROUP INC.;
STRUCTURES GROUP;
E. A. RENFROE, INC.;
JANA RENFROE;
GENE RENFROE; AND
ALEXIS KING — DEFENDANTS

RELATORS' OPPOSITION TO DEFENDANTS E.A. RENFROE & COMPANY INC., GENE RENFROE AND JANA RENFROE'S MOTION FOR SUMMARY JUDGMENT UNDER 31 U.S.C. § 3730(E)(4)

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RELATORS' OPPOSITION
TO DEFENDANTS E.A. RENFROE & COMPANY INC.,
GENE RENFROE AND JANA RENFROE'S MOTION
FOR SUMMARY JUDGMENT UNDER 31 U.S.C. § 3730(E)(4)

I. PRELIMINARY STATEMENT

Relators Cori and Kerri Rigsby (the "Rigsbys" or "Relators") respectfully submit this Opposition to E.A. Renfroe & Company Inc., Gene Renfroe and Jana Renfroe's (collectively, "Renfroe") Memorandum in Support of Its Motion for Summary Judgment Under 31 U.S.C. § 3730(e)(4) (docket entry [182]) ("Renfroe Summ. J. Mem.").

While Renfroe's motion is fashioned as a summary judgment motion, it asserts the same arguments made in State Farm's Memorandum in Support of Its Motion to Dismiss for Lack of Jurisdiction (docket entry [91]) ("State Farm's Mem."). Specifically, Renfroe argues that under the False Claims Act ("FCA"), this Court has no jurisdiction over this matter because (1) the allegations of fraud were publicly disclosed; (2) this action was based on public disclosures; and (3) the Relators are not original sources. Relators already have responded in full to State Farm's arguments (docket entry [223]) ("Relators Response"). Accordingly, pursuant to the Court's Scheduling Order,[1] Relators incorporate by reference Relators' Response to State Farm's Motion in its entirety.

While Relators' Response to State Farm's Motion is sufficient by itself to defeat Renfroe's Summary Judgment Motion, set forth below are several additional points that specifically address Renfroe's arguments.

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[1] The Court held that "[w]here it is practical and expeditious to do so, Relators and Movants may consolidate their responses and memoranda into as few documents as possible, and to this end, any responses, rebuttals, or memoranda may incorporate other responses, rebuttals, or memoranda by reference." Docket entry [205] at 1-2.

II. ARGUMENT

A. Legal Standards

The False Claims Act ("FCA") provides that "[n]o court shall have jurisdiction over an action under this section based upon the public disclosure of allegations . . . unless . . . the person bringing the action is an original source of the information." 31 U.S.C. § 3730(e)(4)(A). This provision is commonly referred to as the "jurisdictional bar." *See, e.g., United States ex rel. Reagan v. E. Tex. Med. Ctr. Reg'l Healthcare Sys.*, 384 F.3d 168, 173 (5th Cir. 2004). Courts use a three-step inquiry to determine whether the jurisdictional bar precludes an FCA suit: "(1) whether there has been a 'public disclosure' of allegations or transactions, (2) whether the qui tam action is 'based upon' such publicly disclosed allegations, and (3) if so, whether the relator is the 'original source' of the information." *Id.* (internal citation omitted). The jurisdictional bar applies only if all three tests are met.

Moreover, because a "challenge under the FCA jurisdictional bar is necessarily intertwined with the merits, [it is] properly treated as a motion for summary judgment." *Id.* at 173. A summary judgment motion should be granted only "when the movant demonstrates that no genuine issue of material fact is in dispute and that it is entitled to judgment as a matter of law." *Thompson v. Syntroleum Corp.*, 108 F. App'x 900, 902 (5th Cir. 2004) (citing *Hunt v. Cromartie*, 526 U.S. 541, 552 (1999); Fed. R. Civ. P. 56(c)). And finally, "at the summary judgment stage, a court may not weigh the evidence or evaluate the credibility of witnesses, and all justifiable inferences will be made in the nonmoving party's favor." *Reagan*, 384 F.3d at 173.

B. **Neither State Farm Nor Renfroe Have Established That The Allegations Of Fraud Were Publicly Disclosed Prior To The Filing Of This Action.**

Renfroe relies on the same two sources cited by State Farm for its argument that this case was publicly disclosed prior to the filing of the complaint: Dr. Hunter's testimony before congress and the *Cox/Comer* complaint. *See* State Farm's Mem. at 6-9. Relators already have demonstrated that these sources are not public disclosures because neither is sufficient to "set government investigators on the trail of fraud." *See* Relators Response at 12-18 (citing *United States ex rel. Fine v. Sandia Corp.*, 70 F.3d 568, 571 (10th Cir. 1995) (quoting *United States ex rel. Rabushka v. Crane Co.*, 40 F.3d 1509, 1514 (8th Cir. 1994)); *Reagan*, 384 F.3d at 174 (same)). While Dr. Hunter's testimony and the *Cox/Comer* complaint generally reference the possibility of industry-wide wrongdoing by insurers, neither allege that the government was being defrauded in any particular manner.

Moreover, neither source even suggests that Renfroe or any other independent claims adjusting companies participated in any type of fraud. Relators allege in this case that Renfroe conspired with State Farm to defraud the government by instructing its adjusters to "hit the limits" when assessing damage under flood policies. Am. Compl. at ¶ 61 (docket entry [16]); Relators Evidentiary Disclosure Pursuant to 31 U.S.C. § 3730 ("Evidentiary Disclosure"), Ex. 14 to docket entry [103] at 26. Because Renfroe's compensation was tied to the amount of damages it adjusted, it profited when its adjusters overstated the amount of flood damage. *Id.* Neither Dr. Hunter nor the *Cox/Comer* complaint contained any information that would suggest, or even imply, that such conduct was happening or might happen in the future. Accordingly,

those sources could not have put the government on the trail of Renfroe's fraud and they do not constitute public disclosures under the FCA.[2]

C. <u>The Complaint Is Not Based On Public Disclosures</u>

In Relators' Response to State Farm's Motion to Dismiss, Relators demonstrated that under any interpretation of the phrase "based on" this lawsuit was not "based on" any public disclosures. *See* Relators Response at 19-23. For the same reasons, Relators' allegations regarding Renfroe were not based on any public disclosures.

Renfroe makes one additional argument that State Farm did not raise in its Motion to Dismiss: that in *E.A. Renfroe & Company, Inc. v. Moran*, 2:06-cv-1752 (N.D. Ala.) ("*Renfroe*"), Kerri Rigsby admitted that "her knowledge of the allegations in this case" is based upon publicly disclosed sources. Renfroe Summ. J. Mem. at 15, *citing* Kerri Rigsby's Response to Renfroe's Motion for Her to Show Cause Why She Should Not Be Held In Criminal Contempt of Court (*Renfroe* docket entry [137] at 2). Renfroe's argument is meritless and Renfroe's description of Kerri Rigsby's words is misleading.

In the *Renfroe* matter, Renfroe argued in a motion that Kerri Rigsby should be held in contempt of court because statements she made in an April 2007 television advertisement violated a preliminary injunction that was entered by Judge Acker. *Renfroe* docket entry [131] at 3 ("Mot. to Show Cause"). The preliminary injunction barred the Rigsbys from using certain

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[2] The cases cited by Renfroe for the proposition that this lawsuit was "based upon" public disclosures are completely inapposite because, unlike the vague information contained in the two sources identified by Renfroe, they involved specific disclosures of the exact fraud at issue. *See Fed. Recovery Servs. Inc. v. United States*, 72 F.3d 447, 451 (5th Cir. 1995) (relator based *qui tam* action on a state unfair trade practices suit that it had filed earlier against the same defendant for the same practice); *U.S. ex rel Fried v. West Indep. Sch. Dist.*, 527 F.3d 439, 442 (5th Cir. 2008) (allegations that a school district was exploiting a loophole to increase social security benefits for its employees were publicly disclosed in a General Accounting Office FraudNET inquiry about the exact practice at issue and congressional hearings that debated the specific loophole and its use by Texas school districts).

documents that they obtained while they were employed by Renfroe and State Farm. In the television advertisement at issue, Kerri Rigsby stated, "I know first hand how far [insurance companies] will go to avoid paying your claim" and she mentioned insurers shredding documents and changing engineering reports. Ex. A-1, Mot. to Show Cause. In its Motion to Show Cause, Renfroe took the position that the television advertisement violated the terms of the injunction because, "Ms. Rigsby and her sister were the originators and suppliers of all the knowledge of the issues she referenced in this ad" and that "Ms. Rigsby is the original source of the information about the changing engineering reports." Mot. to Show Cause at 2-3 (quotation omitted). Essentially, Renfroe argued that because all of the knowledge of State Farm's fraud was originally supplied by the Rigsbys, any mention of that fraud would necessarily violate the injunction.

In her response, Kerri Rigsby argued that her television advertisement did not violate the injunction because (1) by the time the advertisement was made (April 2007), the information already was publicly available; and (2) she had knowledge relating to the advertisement that was separate and apart from the documents that were the subject of the injunction. *Renfroe* docket entry [137] at 13 ("Simply put, given the amount of information publicly available as well as Ms. Rigsby's experiences that were separate and apart from the physical documents themselves, she did not need to 'use' the documents at issue in the December 8th Injunction in order to make the media ad."). To support her argument, Kerri Rigsby attached several public news stories to her Response: Ex. D (www.Bloomberg.com article, April 12, 2007); Ex. E (International Herald Tribune article, April 11, 2007); and Ex. F (The Clarion-Ledger article, April 11, 2007). The complaint in this case was filed on April 26, 2006, nearly a year before any of the media stories Kerri Rigsby cited in her response.

Now, Renfroe criticizes Kerri Rigsby for failing to acknowledge that "her knowledge of the allegations *in this case* is- when it suits her purposes- based on publicly disclosed sources." Renfroe Summ. J. Mem. at 15 (emphasis added). But Kerri Rigsby's position has always been consistent and clear. This case, which was filed in April 2006, is based on the Relators' direct and independent knowledge. The television advertisement, which was made a year later, was not based on documents that were subject to the injunction in *Renfroe*, but rather on Kerri Rigsby's direct and independent knowledge apart from those documents and on information from public sources that were created in April 2007.

Thus, Renfroe's additional argument fails to demonstrate that this action was "based on" public disclosures.

D. The Relators Are An Original Source Of The <u>Information They Provided To The Government.</u>

Even if this lawsuit were based on public disclosures, Renfroe fails to show that Relators are not original sources of the information they provided to the government.

Renfroe argues that Relators are not original sources because they "rely almost exclusively on conclusory assertions" and they have failed to provide specific facts. Renfroe Summ. J. Mem. at 15-16. Relators have already demonstrated that they are original sources for the general and specific allegations in their complaint. *See* Relators Response at 23-32. Indeed, Relators are not merely "disinterested outsiders who simply stumble[d] across an interesting court file." *See United States ex rel. DeCarlo v. Kiewit/AFC Enters., Inc.*, 937 F. Supp. 1039, 1049 (S.D.N.Y. 1996) (internal quotations omitted). But rather, they learned of State Farm's fraud and Renfroe's conduct "in their capacity as employees, and through no other source." Am.

Compl. ¶ 27. The Amended Complaint and evidentiary disclosure explain in detail how Defendants committed fraud against the government including, but not limited to:

- causing Haag Engineering Co. to write a weather report that was contrary to science and all normative models of hurricanes in order to lend credibility to adjusters who were assigning wind claims to water damage;
- using compliant and poorly-trained adjusters from Renfroe in order to assist in handling of flood-related losses;
- ordering blanket engineering reports under the belief that engineering firms would attribute home damage to flooding;
- ordering engineering companies to change the conclusions of their reports for homes like the McIntoshes and the Mullins when the initial report did not reflect flood damage as the cause of loss;
- selectively canceling engineering reports for engineering firms that refused to change the conclusions in their reports; and
- instructing adjusters to overstate the amount of damage when using the XACT Total program in order to "hit the limits" of the flood policies in order to appease homeowners and maximize revenue for adjusting claims.

Am. Compl. ¶¶ 43-45, 56, 61-62, 83-84; Evidentiary Disclosure at 9-12, 21, 24-26.

In any event, the Court need not look beyond Renfroe's Motion to Show Cause in the *Renfroe* matter to reject Renfroe's argument that Relators are not original sources. As described above, Renfroe concedes in that motion that: "Ms. Rigsby and her sister were the originators and suppliers of all the knowledge of the issues she referenced in this ad" and that "**Ms. Rigsby is the original source** of the information about the changing engineering reports." Renfroe's Mot. to Show Cause at 2-3 (emphasis added). Indeed, it is not Relators who have taken inconsistent positions in this litigation.[3]

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[3] Renfroe also argues, without citing a case, that the fact that Relators continued to investigate the defendant's fraud reinforces the conclusion that they lacked direct and independent information to support their claims. Renfroe Summ. J. Mem. at 16. Renfroe's attempt to discourage Relators from continuing to investigate the fraud and disclosing the results of that fraud to the government is antithetical to the purpose of the public disclosure bar. *See, e.g., Reagan*, 384 F.3d at 174 (a purpose of the jurisdictional bar is to "promot[e] private citizen

(Continued …)

E. <u>In the Alternative, Renfroe's Motion Should Be Denied Under Rule 56(f)</u>.

While the Court does not need to reach this issue, Renfroe's motion should also be denied under Federal Rule of Civil Procedure 56(f) because Relators have not had an opportunity to conduct discovery.[4] *See, e.g.*, *Anderson v. Liberty Lobby, Inc.,* 477 U.S. 240, 242 n. 5 (1986) (describing Rule 56(f) as providing "that summary judgment [may] be refused where the nonmoving party has not had the opportunity to discover information that is essential to his opposition"); *Culwell v. City of Fort Worth*, 468 F.3d 868, 871 (5th Cir. 2006) (Rule 56(f) requests are "broadly favored and should be liberally granted") (internal citation omitted); *Wichita Falls Office Assoc. v. Banc One Corp.*, 978 F.2d 915, 920 (5th Cir. 1992) ("when a party is seeking discovery that is germane to the pending summary judgment motion it is inequitable to pull out the rug from under them by denying such discovery").

Relators previously requested leave to seek discovery before responding to the pending dispositive motions. Docket entry [212].[5] In their request, Relators explained that Renfroe and

(… Continued)
involvement in exposing fraud against the government"). Other courts have also found that relators are original sources of information they uncover through investigation when the investigation began after the relators obtained direct and independent knowledge of the defendant's fraud. *See, e.g., United States ex rel. Farmer v. City of Houston*, No. 03-cv-3713, 2005 WL 1155111, at *5 (S..D. Tex. May 5, 2005) (relator's "entire investigation began as a result of her independent knowledge" of the defendant's fraud, and relator had "direct" knowledge of everything learned during the investigation as a result); *Cooper v. Blue Cross and Blue Shield of Fla.*, 19 F.3d 562, 566 (11th Cir. 1994) (knowledge learned during relator's investigation was "direct" when, after defendant processed his insurance claims, relator then researched laws governing insurance claims and corresponded with members of Congress and Health Care Financing Administration as part of investigation).

[4] Rule 56(f) provides that a court may deny a summary judgment motion when, without discovery, a party opposing the motion cannot present facts essential to justify its opposition. And, as State Farm has acknowledged, a separate affidavit is not required under Rule 56(f). Docket entry [232] at 3 note 1. *See also Int'l Shortstop, Inc. v. Rally's Inc.*, 939 F.2d 1257, 1266-67 (5th Cir. 1991).

[5] Relators also raised their pending discovery requests in opposition to State Farm's Motion to Dismiss. *See* docket entry [223] at 32.

State Farm have raised factual questions as to the Relators' status as original sources by arguing that Relators cannot show that they produced evidence of a meritorious fraud claim. *Id.* at 2. Relators further described how they do not have access to the False Claims Documents, a specifically defined[6] set of documents that both State Farm and Renfroe possess, and they argued that they should be allowed to use those documents to demonstrate that they are original sources who have produced evidence of meritorious fraud claims. *Id.* at 2-3.[7]

Thus, to the extent the Court reaches this issue, which it should not, Relators respectfully request, pursuant to Rule 56(f), that they have access to the False Claims Documents in order to respond to this Summary Judgment Motion. Accordingly, because Relators have not yet had the opportunity to access the requested discovery that would allow them to further establish their status as original sources and respond to the factual questions in Renfroe's summary judgment motion, Renfroe's motion should be denied.

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[6] In response to State Farm's objections, Relators subsequently narrowed their request to the set of documents that State Farm received pursuant to Judge Acker's July 1, 2008 Order. *See* Relators' Reply in Support of Their Motion for Expedited Document Requests at 6. Docket entry [221] at 6.

[7] This description of necessary discovery is more than sufficient to satisfy Rule 56(f). *See Enplanar, Inc. v. Marsh*, 11 F.3d 1284, 1294 (5th Cir. 1994) (denying a Rule 56(f) request that did not mention why the plaintiff needed the requested discovery, but noting that "we are not requiring clairvoyance on the part of the [plaintiffs]. They do not need to know the precise content of the requested discovery, but they do need to give the district court some idea of how the sought-after discovery might reasonably be supposed to create a factual dispute.").

III. CONCLUSION

For the foregoing reasons, Renfroe's Summary Judgment Motion should be denied.

THIS the 29th day of September, 2008.

Respectfully submitted,

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CERTIFICATE OF SERVICE

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