

**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' MOTION FOR LEAVE TO PROPOUND
EXPEDITED DOCUMENT REQUESTS IN ORDER TO RESPOND
TO DEFENDANTS' PENDING DISPOSITIVE MOTIONS**

In its August 6, 2008 Order, this Court set a briefing schedule for the defendants' pending dispositive motions. The Court further provided that "[i]f counsel represents to the Court that it will be necessary to take discovery in order to prepare responses... I will require that the discovery requests be specific and that they be directly relevant to the issues framed by these motions." (docket entry [205] at 2). Cori and Kerri Rigsby (the "Relators"), through undersigned counsel, have reviewed the pending dispositive motions, and, as set forth below, respectfully request leave to propound Relators' First Set of Requests for Production of Documents ("Document Requests") on State Farm Mutual Insurance Company ("State Farm"). In the

Document Requests, which are attached at Tab A, the Relators request State Farm to produce: (1) the documents allegedly downloaded, copied, taken, or transferred from the premises, files, records, or systems of E.A. Renfroe & Company, Inc. or State Farm by the Rigsbys that refer or relate to any insurance claims involving damages caused or alleged to have been caused by Hurricane Katrina (the “False Claims Documents”) and (2) underwriting files for policies known to be referenced in the False Claims Documents.

A. Relators’ Counsel Needs Access to the False Claims Documents Because Those Documents Were a Significant Part of the Relators’ Disclosure to the United States.

1. The Relators already have access to the False Claims Documents in connection with *E.A. Renfroe & Company, Inc. v. Moran*, 2:06-cv-1752 (N.D. Ala.) (“*Renfroe*”), but counsel reads the orders from that case and from this Court to hold that the Rigsbys must obtain the documents through discovery in order to use them in this action. Thus, counsel is at this moment in the very unusual position of not having access to the very documents that were a significant portion of the basis of this *qui tam* action. Accordingly, the Relators request leave to seek expedited discovery of the False Claims Documents in order to respond to the factual challenges that State Farm makes in its Motion to Dismiss for Lack of Subject Matter Jurisdiction, which was filed on April 8, 2008.¹

2. In that motion, State Farm directly challenges the alleged fact that the Rigsbys are an “original source” of the information provided to the United States by asserting that “the Rigsbys cannot show that they produced evidence of a meritorious fraud claim.” State Farm’s Memorandum in Support of its Motion to Dismiss for Lack of Subject Matter Jurisdiction (docket entry [92] at 14 (internal quotation omitted) (“State Farm’s Motion to Dismiss”).

¹ Some of the other defendants have filed similar motions. *See, e.g.*, Haag’s Motion to Dismiss for Lack of Jurisdiction (docket entry [106]); Exponent’s Motion to Dismiss for Lack of Jurisdiction (docket entry [156]).

3. Because the False Claims Documents are a significant portion of the information that the Relators provided to the United States, *see United States ex rel. Detrick v. Young*, 909 F. Supp. 1010, 1017 (E.D. Va. 1995), the Relators should be allowed to use those documents to demonstrate that they have in fact produced evidence of meritorious fraud claims, and that they are an original source.²

B. The Relators' Counsel Needs Access to the Underwriting Files That Correspond to the Claims Files in the False Claims Documents Because Those Files Will Support the Relators' Position That They Provided Evidence of Fraud to the United States.

4. It is a matter of public record that the False Claims Documents consist of claims files relating to individual State Farm policyholders. Indeed, State Farm has produced a list of the claims files that it alleges Kerri Rigsby accessed while collecting those documents ("State Farm's List"). *See* State Farm's Motion to Disqualify Barrett Law Office, Nutt & McAlister, Lovelace Law Firm, Exhibit 46, *Shows v. State Farm Automobile Insurance Company*, No: 1:07-cv-00709, Docket No. [91] (attached as Exhibit A to Relators' First Set of Requests for Production of Documents). For the reasons set forth below, the Relators request that the Court order State Farm to produce the underwriting files of those policyholders who are on State Farm's List.

5. State Farm argues that that "the Rigsbys cannot show that they produced evidence of a meritorious fraud claim." State Farm's Motion to Dismiss at 14. The Relators' Evidentiary Disclosure, (Exhibit 14 to State Farm's Motion to Disqualify Relators' Counsel docket entry [103] at 27) ("Evidentiary Disclosure"), however, describes several ways that the defendants committed fraud. For example, State Farm instructed claims adjusters to always "hit the limits"

² The Relators generally are entitled to discovery because the defendants' argument that they were not the original source of the information at issue is a jurisdictional question. *See McAllister v. F.D.I.C.*, 87 F.3d 762, 766 (5th Cir. 1996) (when a court "makes factual determinations decisive of a motion to dismiss for lack of jurisdiction, it must give plaintiffs an opportunity for discovery") (internal citation omitted).

of flood policies when they were adjusting flood claims. (Am. Compl., docket entry [16] at ¶¶ 60-64). The Evidentiary Disclosure explains in detail that adjusters used a program called “XACT TOTAL” to calculate flood claims and hit the policy limits. Evidentiary Disclosure at 27. The program calculated the costs to rebuild the home based in part on square footage and other features in the houses, and the adjusters were instructed to re-enter such data until they eventually “hit the limits.” *Id.*

6. The underwriting files will support the Rigsbys’ allegations because State Farm requires applicants for home owner’s insurance to list their homes’ square footage and other features in their applications.³ Where State Farm inflated the square footage or other features in XACT Total, they will not match the information in the underwriting files. Accordingly, the Relators believe that the underwriting files will show precisely which claims were fraudulent with respect to these criteria.

C. The Relators Request That This Court Require State Farm to Produce Documents by August 25, 2008, and That the Relators Be Given Two Weeks From the Time State Farm Produces Documents to Respond to State Farm’s Motion to Dismiss.

7. The Relators understand that this Court intends to decide the pending dispositive motions “expeditiously.” (docket entry [205] at 1-2). However, as set forth above, counsel for the Relators have not had an opportunity to review the “hundreds of . . . claims files” contained in the False Claims Documents. (Memorandum Opinion docket entry [177] at 2). The Relators intend to make every effort to respond to State Farm’s Motion to Dismiss as soon as possible, but the Relators recognize that it will take time to review the requested discovery. Accordingly, the Relators propose that this Court order State Farm to produce the documents by August 25,

³ A homeowner’s insurance application is available at <http://www.statefarm.com/>.

and the Relators to reply to State Farm's Motion to Dismiss by September 8. If, however, State Farm is unable to produce the documents by August 25, the Relators request that they be given two weeks from the time State Farm produces the documents to reply to State Farm's Motion to Dismiss.

Wherefore, the Relators respectfully request that the Court grant the Relators leave to propound the attached Document Requests on State Farm, order State Farm to produce all responsive documents by August 25, 2008, and that Relators be given until September 8, or two weeks after State Farm produces the documents to reply to State Farm's Motion to Dismiss.

THIS the 15th day of August, 2008.

Respectfully submitted,

/s/ C. Maison Heidelberg

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CERTIFICATE OF SERVICE

I, Maison Heidelberg, attorney for Cori Rigsby and Kerri Rigsby, do hereby certify that I have this day caused a true and correct copy of the foregoing instrument to be delivered to the following, via the means directed by the Court's Electronic Filing System or as otherwise set forth below:

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**THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
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CORI RIGSBY; AND KERRI RIGSBY

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STATE FARM MUTUAL
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STRUCTURES GROUP;
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JANA RENFROE;
GENE RENFROE; AND
ALEXIS KING

DEFENDANTS

**RELATORS' FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS TO
STATE FARM MUTUAL INSURANCE COMPANY**

The Relators, Cori and Kerri Rigsby, by and through their undersigned attorneys, propound the following First Set of Requests for Production of Documents (the "Document Requests") to Defendant State Farm Mutual Insurance Company ("State Farm"). The Document Requests are to be answered separately and fully in writing under oath within thirty (30) days of service as provided in Rule 34 of the Federal Rules of Civil Procedure, or at such earlier time as the Court may direct.

The Document Requests shall be deemed continuing, and if State Farm discovers additional information as to matters inquired of in these Document Requests between the time

answers are made and the time of trial, supplemental or amended answers must be made at the earliest practical date.

I. DEFINITIONS

In construing the Document Requests, the following terms shall have the following meanings:

1. The terms “Document” and “Documents” are used in the broadest sense permissible under Federal Rule of Civil Procedure 34.

2. “E.A. Renfroe” means E.A. Renfroe & Company, Inc. and its past, present, and future Employees, officers, directors, principals, attorneys, counsel, spokespersons, subsidiaries, affiliates, agents, representatives, predecessors, successors, and assigns, including, but not limited to, all entities controlled by, controlling, or under the control of E.A. Renfroe Company, Inc.

3. “Employee” means any former or current employee, officer, agent, representative, consultant, expert, office, committee, department, division, or group, including, but not limited to, those at corporate or division headquarters, or at any regional, departmental, or local office anywhere in the world.

4. “False Claims Documents” means all Documents allegedly downloaded, copied, taken, or transferred from the premises, files, records, or systems of E.A. Renfroe or State Farm by the Rigsbys that refer or relate to any insurance claims involving damages caused or alleged to have been caused by Hurricane Katrina.

5. “State Farm” means State Farm Mutual Insurance Company, State Farm Fire and Casualty Company, and their past, present, and future Employees, officers, directors, principals, attorneys, counsel, spokespersons, subsidiaries, affiliates, agents, representatives, predecessors,

successors, and assigns, including, but not limited to, all entities controlled by, controlling, or under the control of State Farm Mutual Insurance Company or State Farm Fire and Casualty Company.

II. INSTRUCTIONS

1. The scope of these Document Requests is as broad as is permissible under Federal Rule of Civil Procedure 34.

2. These Document Requests are continuing and require supplemental production if You discover additional Documents that are responsive to these Requests.

3. The singular form of any word shall refer to the plural as well. The connectives “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside its scope.

III. DOCUMENTS REQUESTED

1. All False Claims Documents, including but not limited to the documents referenced in Exhibit A.
2. All Documents used in the underwriting or issuance of the insurance policies referenced in Exhibit A, including, without limitation, all documents used in deciding whether to issue a policy and what premium to charge with respect to the policies referenced in Exhibit A.

Dated: August 15, 2008

/s/ C. Maison Heidelberg

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Exhibit A

to Relators' First Set of Requests for Production of Documents to State Farm

COMPARISON OF KERRI RIGSBY'S CSR ACCESS REPORT AND MCFARLAND EXHIBIT A

Kerri Rigby CSR Access Report

Policyholder Name	Policy Number	Release Date	Release Time	Signon ID
BordersRahn, Jacquelyn	24BA06058	6/2/2006	21:35:03.624	HVMZ
Carvey, Michael	24CD97373	6/2/2006	21:36:47.337	HVMZ
McNamee, Betty	24CH01723	6/2/2006	21:38:05.331	HVMZ
SeelScheibengraber, Ma	24CG72629	6/2/2006	21:40:33.417	HVMZ
Williams, James	240061453	6/2/2006	21:41:34.822	HVMZ
Seals, Benny	24CW28827	6/2/2006	21:42:16.191	HVMZ
Norman, Frank	24B517542	6/2/2006	21:42:56.902	HVMZ
Quave, Susan	241817772	6/2/2006	21:43:19.781	HVMZ
Pickitch, Jeffrey	99CE65898	6/2/2006	21:43:41.342	HVMZ
Becker, Dorothy	24B251938	6/2/2006	21:56:55.189	HVMZ
Abels, Shirley	99CE47229	6/2/2006	21:58:38.700	HVMZ
Allen, Woody	24BW30465	6/2/2006	22:14:50.744	HVMZ
Allred, Ellen	24CA88974	6/2/2006	22:18:23.548	HVMZ
y	99B907095	6/2/2006	22:19:27.219	HVMZ
y	99B907095	6/2/2006	22:21:50.102	HVMZ
Awad, Mohamed	24CW97745	6/2/2006	22:23:52.913	HVMZ
Baricev, Anthony	99B908945	6/2/2006	22:27:40.773	HVMZ
Barlow, Hubert	240280560	6/2/2006	22:29:50.030	HVMZ
Barrett, Marie	24BZ60579	6/2/2006	22:30:55.729	HVMZ
Barilleaux, Robert	248702399	6/2/2006	22:34:58.743	HVMZ
Bates, Lula	24B087157	6/2/2006	22:38:13.668	HVMZ
Bauge, Robert	99CT36219	6/2/2006	22:40:47.811	HVMZ
Beany, Charles	24BT91340	6/2/2006	22:43:03.713	HVMZ
Beasley, James	240753994	6/2/2006	23:15:07.985	HVMZ
Becker, Ernest	24BG70891	6/2/2006	23:16:51.635	HVMZ
Beckham, Vincent	247091085	6/2/2006	23:19:00.476	HVMZ
Belden, Mary Ellen	247103904	6/2/2006	23:23:05.683	HVMZ
Bell, Elizabeth	249734409	6/2/2006	23:24:27.933	HVMZ
Berry, Theda	240877961	6/2/2006	23:26:02.285	HVMZ
Bishop, James	247994864	6/2/2006	23:28:59.529	HVMZ
Blitler, Lawrence	249583004	6/2/2006	23:33:37.983	HVMZ
Boggs, Archie	99BR37466	6/2/2006	23:35:11.435	HVMZ

McFarland Complaint Exhibit A

Policyholder Name	Policy Number
Becker, Dorothy	24B251938
Abels, Shirley	99CE47229
Allen, Woody	24BW30465
Allred, Ellen	
Applewhite, Joe	99B907095
Applewhite, Joe	99B907095
Awad, Mohamed	24CW97745
Baricev, Anthony	99B908945
Barlow, Hubert	240280560
Barilleaux, Robert	248702399
Bates, Lula	24B087157
Bauge, Robert	99CT36219
Beany, Charles	24BT91340
Beasley, James	240753994
Becker, Ernest	24BG70891
Beckham, Vincent	247091085
Belden, Mary Ellen	247103904
Bell, Elizabeth	249734409
Berry, Theda	240877961
Bishop, James	247994864
Blitler, Lawrence	249583004
Boggs, Archibald	99BR37466

Exhibit "46"

Merri Rigsby CSR Access Report

Policyholder Name	Policy Number	Release Date	Release Time	Signon ID
Morrison, Wayne	24BD77659	6/2/2006	23:35:56.495	HVWZ
Boggs, Vera	24B364251	6/2/2006	23:36:53.397	HVWZ
Boggs, Charles	24B036204	6/3/2006	09:43:55.970	HVWZ
Boggs, Vera	24D004875	6/3/2006	09:44:31.791	HVWZ
Bonck, June	241851613	6/3/2006	09:48:55.324	HVWZ
Bond, Jennifer	240359531	6/3/2006	09:51:02.918	HVWZ
Bosarg, Elisabeth	24CW96628	6/3/2006	09:52:57.609	HVWZ
Boudreaux, Chad	24B545782	6/3/2006	09:56:04.304	HVWZ
Bounds, Clifford	99CT43252	6/3/2006	09:58:06.624	HVWZ
Bradford, Lynn	248856484	6/3/2006	10:02:32.218	HVWZ
Bradley, Bruce	990866398	6/3/2006	10:17:30.714	HVWZ
Brandner, Michael	24BR13642	6/3/2006	10:23:00.240	HVWZ
Brandner, Michael	24CH30890	6/3/2006	10:25:44.562	HVWZ
Brandner, Michael	24CW56628	6/3/2006	10:34:17.340	HVWZ
Branning, Kenneth	99CT20153	6/3/2006	10:35:29.122	HVWZ
Brasher, Richard	241877226	6/3/2006	10:59:54.785	HVWZ
Breeding, Mary	248661011	6/3/2006	11:02:37.999	HVWZ
Brinkley, France	24CE76891	6/3/2006	11:04:33.721	HVWZ
Broussard, Catherine	24B520740	6/3/2006	11:09:42.635	HVWZ
Brown, Billy	24CB76173	6/3/2006	11:10:56.368	HVWZ
Brown, Charles	24CW15566	6/3/2006	11:12:31.399	HVWZ
Brown, Marion	241757083	6/3/2006	11:14:01.420	HVWZ
Brown, Claude	24CP95933	6/3/2006	11:15:32.812	HVWZ
Brunelle, Randy	240615981	6/3/2006	11:17:14.638	HVWZ
Bruno, Judith	24BT04564	6/3/2006	11:18:43.774	HVWZ
Bullock, Ervin & Linda	99CR73866	6/3/2006	11:20:50.927	HVWZ
Burkes, Laurie	24CB58771	6/3/2006	11:22:39.439	HVWZ
Calcagno, Ron	24CD68030	6/3/2006	11:24:19.771	HVWZ
Caldwell, Agnes	24CW73062	6/3/2006	11:25:52.431	HVWZ
Caldwell, Joseph	24BV09673	6/3/2006	11:30:52.487	HVWZ
Cameron, Matthew	24CJ02629	6/3/2006	11:32:25.079	HVWZ
Campbell, Jefferson	24CL75831	6/3/2006	11:34:06.650	HVWZ
Carney, Linda	24B296123	6/3/2006	11:55:02.601	HVWZ
Castigliola, Vincent	995417288	6/3/2006	11:57:43.023	HVWZ
Castigliola, Lois	24BC03459	6/3/2006	12:01:36.670	HVWZ

McFarland Complaint Exhibit A

Policyholder Name	Policy Number
Boggs, Charles	
Bonck, June	241851613
Bonck, Ronald	240359531
Bond, Jennifer	24CW96628
Bosarg, Elisabeth	24B545782
Boudreaux, Chad	99CT43252
Bounds, Clifford	248856484
Bradford, Lynn	990866398
Bradley, Bruce	24BR13642
Brandner, Michael	24CH30890
Brandner, Michael	24CW56628
Branning, Kenneth	99CT20153
Brasher, Richard	241877226
Breeding, Mary	248661011
Brinkley, France	24CE76891
Broussard, Catherine	24B520740
Brown, Billy	24CB76173
Brown, Charles	24CW15566
Brown, Marion	241757083
Brown, Claude	24CP95933
Brunelle, Randy	240615981
Bruno, Judith	24BT04564
Bullock, Ervin & Linda	99CR73866
Burkes, Laurie	24CB58771
Calcagno, Ron	24CD68030
Caldwell, Agnes	24CW73062
Caldwell, Joseph	24BV09673
Cameron, Matthew	24CJ02629
Campbell, Jeff	24CL75831
Carney, Linda	24B296123
Castigliola	24BC03459

Kerri Rigsby CSR Access Report

Policyholder Name	Policy Number	Release Date	Release Time	Signon ID
Caudill, Paula	240952162	6/3/2006	12:02:58.679	HVWZ
Causey, James	248D38745	6/3/2006	12:05:12.012	HVWZ
Chamberlain, Ernest	248H25204	6/3/2006	12:07:34.774	HVWZ
Childress, Betty	249238015	6/3/2006	12:09:09.746	HVWZ
Ciriot, Marlon	24CC76643	6/3/2006	12:13:22.160	HVWZ
Clark, Joyce	248Z42478	6/3/2006	12:15:01.131	HVWZ
Clark, Richard	241367287	6/3/2006	12:17:13.524	HVWZ
Cleek, Sally	248U27615	6/3/2006	12:19:25.087	HVWZ
Coakley, Robert	990916078	6/3/2006	12:23:43.089	HVWZ
Coakley, Robert	240463695	6/3/2006	12:25:43.693	HVWZ
Cochran, Thomas	24CD64397	6/3/2006	12:27:07.506	HVWZ
Cole, Hazel	240715173	6/3/2006	12:29:22.267	HVWZ
Coleman, Charles	248S22154	6/3/2006	12:31:02.747	HVWZ
Combs, Allyn	249942006	6/3/2006	12:33:31.750	HVWZ
Comeaux, Robert	24EO87301	6/3/2006	12:35:11.671	HVWZ
Conerly, Norlan	240283388	6/3/2006	12:37:13.785	HVWZ
Conerly, Norlan	240283388	6/3/2006	12:37:48.266	HVWZ
Consolino, Betty	24CS79421	6/3/2006	12:39:10.706	HVWZ
Costas, William	99CE69961	6/3/2006	12:41:34.252	HVWZ
Cox, Albert	248U80263	6/3/2006	12:43:19.500	HVWZ
Craig, Elsie	248900894	6/3/2006	12:44:39.221	HVWZ
Cramer, Harold	24CS46453	6/3/2006	12:45:40.302	HVWZ
Cropp, Barbara	240721530	6/3/2006	12:47:17.374	HVWZ
Sims, Carlene	24CV43699	6/3/2006	12:49:28.096	HVWZ
Curry, Edmund	24BD38188	6/3/2006	12:51:39.038	HVWZ
Dambrino, Robert	24CQ90441	6/3/2006	12:52:22.250	HVWZ
Daniel, George	24CD91242	6/3/2006	12:54:52.702	HVWZ
Davis, Clarence	24BM61919	6/3/2006	13:12:57.021	HVWZ
Davis, Jesse	99CE63956	6/3/2006	13:14:31.522	HVWZ
Davis, Emmitt	249567544	6/3/2006	13:16:03.692	HVWZ
Davis, Patricia	241127962	6/3/2006	13:18:24.255	HVWZ
Waldsmith, Richard	24B823298	6/3/2006	13:18:46.697	HVWZ
Dearman, Eugene	24BP73125	6/3/2006	13:20:45.177	HVWZ
Dedeaux, Manual	24CC35662	6/3/2006	13:24:18.432	HVWZ
Delaughter, Daniel	24CP83560	6/3/2006	13:26:14.924	HVWZ

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Policyholder Name	Policy Number
Caudill, Paula	240952162
Causey, James	248D38745
Chamberlain, Ernest	248H25204
Childress, Betty	249238015
Ciriot, Marlon	24CC76643
Clark, Joyce	248Z42478
Clark, Richard	
Cleek, Sally	248U27615
Coakley, Robert	990916078
Coakley, Robert	240463695
Cochran, Thomas	24CD64397
Cole, Hazel	240715173
Coleman, Charles	248S22154
Combs, Allyn	249142006F
Comeaux, Robert	24EO87301
Conerly, Norlan	240283388
Consolino, Betty	24CS79421
Costas, William	99CE69961
Cox, Albert	248U80263
Craig, Elsie	248900894
Cramer, Harold	24CS46453
Cropp, Barbara	240721530
Curry, Edmund	24BD38188
Dambrino, Robert	
Daniel, George	24CD91242
Clarence, Davis	24BM61919
Davis, Jesse	99CE63956
Davis, Emmitt	249567544
Davis, Patricia	
Dearman, Eugene	24BP73125
Dedeaux, Manual	24CC35662
Delaughter, Daniel	24CP83560

Kerri Riggsby CSR Access Report

Policyholder Name	Policy Number	Release Date	Release Time	Signon ID
Delmas, Helen	248067276	6/3/2006	13:27:22.573	HVWZ
Desporte, James	248814527	6/3/2006	13:30:15.649	HVWZ
Desport, Richard	24RC17912	6/3/2006	13:31:12.631	HVWZ
Desporte, Richard	24RC17912	6/3/2006	13:31:44.418	HVWZ
Dillee, Anita	24B408211	6/3/2006	13:32:55.401	HVWZ
Disalvo, Catherine	240649576	6/3/2006	13:34:22.471	HVWZ
Dix, Brian	24CQ57467	6/3/2006	13:37:26.177	HVWZ
Downs, Cleamon	247907660	6/3/2006	13:39:28.777	HVWZ
Dunn, Richard	241458595	6/3/2006	13:42:05.850	HVWZ
Dunston, Katherine	247296193	6/3/2006	13:43:58.722	HVWZ
Durham, John	248W90752	6/3/2006	13:48:16.033	HVWZ
Dykes, David	24B966087	6/3/2006	13:48:08.435	HVWZ
Dykes, Tracey	24CX62236	6/3/2006	13:50:31.857	HVWZ
Eades, Walter	998R97955	6/3/2006	13:52:36.989	HVWZ
Gospodinovich, Jane	248243255	6/3/2006	13:54:34.172	HVWZ
Elliffitt, Scott	24CL90313	6/3/2006	13:56:20.383	HVWZ
Hill, Dale	99BX84902	6/3/2006	14:49:12.376	HVWZ
Hill, Dale	247541509	6/3/2006	14:50:02.407	HVWZ
Brown, John	240759605	6/3/2006	14:50:58.140	HVWZ
Shepherd, David	24CM79476	6/3/2006	14:52:05.361	HVWZ
Schriener, Joe	24CQ88866	6/3/2006	14:53:53.372	HVWZ
Hill, Dale	247541509	6/3/2006	14:54:47.894	HVWZ
Brown, John	240759605	6/3/2006	14:55:48.333	HVWZ
Shepherd, David	24CM79476	6/3/2006	14:56:48.334	HVWZ
Schriener, Joe	24CQ88866	6/3/2006	14:58:24.194	HVWZ
Sinders, Mary	24BV83591	6/3/2006	14:59:26.639	HVWZ
Austin, Claude	24B710402	6/3/2006	15:00:24.799	HVWZ
Kemmerly, William	241015849	6/3/2006	15:01:12.562	HVWZ
Dereyna, Ollis	24CS80359	6/3/2006	15:02:59.344	HVWZ
Erichsen, Robert	247813645	6/3/2006	15:03:58.002	HVWZ
Crochet, Chris	99CK83292	6/3/2006	15:04:48.073	HVWZ
Espinoza, Eddie	24CK10731	6/3/2006	15:05:31.045	HVWZ
Hickson, Robert	241054927	6/3/2006	15:06:34.786	HVWZ
Miner, John	241163854	6/3/2006	15:08:42.048	HVWZ
Bukvic, James	24CM75656	6/3/2006	15:09:54.909	HVWZ

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Policyholder Name	Policy Number
Delmas, Helen	248067276
Desporte, James	248814527
Dillee, Anita	24B408211
Disalvo, Catherine	240649576
Dix, Brian	24CQ57467
Downs, Cleamon	247907660
Dunn, Richard	241458595
Dunston, Katherine	247296193
Durham, John	248W90752
Dykes, David	
Dykes, Tracey	998R97955
Eades, Walter	
Elliffitt, Scott	24CL90313

Kerri Rigsby CSR Access Report

Policyholder Name	Policy Number	Release Date	Release Time	Signon ID
w	994669166	6/3/2006	20:28:13.324	HVVZ
Eubanks, Robert	24CD96270	6/3/2006	20:30:28.627	HVVZ
Fairleigh, Thomas	241721962	6/3/2006	20:31:43.988	HVVZ
Falks, Curtis	24CE06312	6/3/2006	20:33:25.130	HVVZ
Farrington, Charles & Jeanie	99CR74209	6/3/2006	20:35:39.671	HVVZ
Felder, John	99B916599	6/3/2006	20:36:48.685	HVVZ
Felder, Doris	990899649	6/3/2006	20:38:14.686	HVVZ
Felder, John	248904284	6/3/2006	20:39:41.285	HVVZ
Feranda, Tammy	241085416	6/3/2006	20:41:28.818	HVVZ
Finch, Christopher	99CT25949	6/3/2006	20:44:29.250	HVVZ
Flint, Robert	24B060109	6/3/2006	20:46:55.104	HVVZ
Flowers, Archie	241280763	6/3/2006	20:48:30.755	HVVZ
Forte, Joseph	240019188	6/3/2006	20:49:56.096	HVVZ
Foster, James	24C29184	6/3/2006	20:50:40.677	HVVZ
Dunkley, Patricia	24E040821	6/3/2006	20:51:48.078	HVVZ
Foster, Joe	24B752222	6/3/2006	20:55:11.590	HVVZ
Franklin, Donald	24BH46335	6/3/2006	20:58:31.366	HVVZ
French, Bennie	241294394	6/3/2006	21:00:17.506	HVVZ
Gandy, John	246431821	6/3/2006	21:02:11.200	HVVZ
Garrard, Joseph	247135522	6/3/2006	21:04:11.960	HVVZ
Gautier, H.	24BM61756	6/3/2006	21:05:26.083	HVVZ
Gautier, Lawrence	24BW18989	6/3/2006	21:06:47.144	HVVZ
George, James	24B995607	6/3/2006	21:08:45.036	HVVZ
Geraci, Jacob	24BN28432	6/3/2006	21:10:00.156	HVVZ
Geroux, Alfred	249494636	6/3/2006	21:11:31.813	HVVZ
Gex, Joseph	24B209409	6/3/2006	21:13:32.970	HVVZ
Gibbons, Steven	241294634	6/3/2006	21:16:45.504	HVVZ
Gilley, Alice	990282715	6/3/2006	21:18:34.856	HVVZ
Glenn, William	247617715	6/3/2006	21:19:47.117	HVVZ
Glorvigen, Lloyd	240439719	6/3/2006	21:21:52.378	HVVZ
Goff, Ruby	240240578	6/3/2006	21:23:47.684	HVVZ
Goodgame Betty	24BK78517	6/3/2006	21:25:46.111	HVVZ
Gordon, Samuel	24CS12851	6/3/2006	21:28:29.667	HVVZ

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Policyholder Name	Policy Number
Eselin, Virginia	994669166
Eubanks, Robert	24CD96270
Fairleigh, Thomas	241721962
Falks	24CE06312
Farrington, Charles & Jeanie	99CR74209
Felder, John	99B916599
Felder, Doris	990899649
Felder, John	248904284
Feranda, Tammy	
Flint, Robert	
Flowers, Archie	241280763
Forte, Joseph	240019188
Foster, James	
Foster, Joe	24B752222
Franklin, Donald	
French, Bennie	241294394
Gandy	
Garrard, Joseph	247135522
Gautier, Hermes	24BM61756
Gautier, Lawrence	24BW18989
George, James	24B995607
Geraci, Jacob	24BN28432
Geroux, Alfred	249494636
Gex, Joseph	24B209409
Gibbons, Steven	241294634
Gilley, Alice	990282715
William, Glenn	247617715
Glorvigen, Lloyd	240439719
Goff	240240578
Goodgame, Betty	24BK78517
Gordon, Samuel	24CS12851