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").

2

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"

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. 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 C. MAISON HEIDELBERG, MB #9559 GINNY Y. KENNEDY, MB #102199

OF COUNSEL:

MAISON HEIDELBERG P.A. 795 Woodlands Parkway, Suite 220 Ridgeland, Mississippi 39157 Phone No. (601) 351-3333 Fax No. (601) 956-2900

August J. Matteis, Jr. (admitted *pro hac vice*)
Craig J. Litherland (admitted *pro hac vice*)
Benjamin Davidson (admitted *pro hac vice*)
GILBERT RANDOLPH LLP
1100 New York Avenue NW
Suite 700
Washington, DC 20005
Phone No. (202) 772-2200
Fax No. (202) 772-3333

Attorneys for Kerri Rigsby and Cori Rigsby

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:

Larry G. Canada, Esq.
Kathryn Breard Platt, Esq.
GALLOWAY, JOHNSON, TOMPKINS, BURR & SMITH
701 Poydras Street, Suite 4040
New Orleans, LA 70139
(p) 504-525-6802
ATTORNEYS FOR HAAG ENGINEERING CO.

William C. Bell, Esq. WILLIAM C. BELL, ATTORNEY P.O. Box 1876 Ridgeland, MS 39157 (p) 601-956-0360 ATTORNEY FOR JADE ENGINEERING

James C. Simpson, Jr., Esq. MONTGOMERY, BARNETT, BROWN, READ, HAMMOND & MINTZ, LLP 2310 19th Street Gulfport, MS 39501 (p) 228-863-6534

David A. Ward, Jr., Esq.
THE WARD LAW FIRM
10003 Woodloch Forest Drive, Suite 100
The Woodlands, TX 77382
(p) 281-362-7728
ATTORNEYS FOR RIMKUS CONSULTING GROUP, INC

Frank W. Trapp, Esq. Kelly R. Blackwood, Esq. PHELPS DUNBAR P.O. Box 23066 Jackson, MS 39225 (p) 601-352-2300 ATTORNEYS FOR STRUCTURES GROUP

H. Hunter Twiford, III, Esq. MCGLINCHEY STAFFORD

P. O. Drawer 22949 Jackson, MS 39225 (p) 601-960-8400

Beth C. McClain, Esq.
John T. Boese, Esq.
FRIED, FRANK, HARRIS, SHRIVER & JACOBSON, LLP
1001 Pennsylvania Avenue, N.W., Suite 800
Washington, DC 20004
ATTORNEYS FOR E. A. RENFROE, INC.,
GENE RENFROE, AND JANA RENFROE

Robert C. Galloway, Esq.
Emerson Barney Robinson, III, Esq.
Jeffrey A. Walker, Esq.
BUTLER, SNOW, O'MARA, STEVENS & CANNADA, PLLC
P.O. Box 22567
Jackson, MS 39225
(p) 601-948-5711

Michael B. Beers, Esq.
BEERS, ANDERSON, JACKSON, PATTY & FALWAL, PC
250 Commerce Street, Suite 100
Montgomery, AL 36104
(p) 334-834-5311
ATTORNEYS FOR STATE FARM MUTUAL
INSURANCE COMPANY

Philip Williams Thomas, Esq. PHILIP W. THOMAS, P.A. P.O. Box 24464 Jackson, MS 39225 (p) 601-714-5660 ATTORNEY FOR EXPONENT, INC.

Felicia C. Adams, Esq.
U. S. Attorney's Office
188 E. Capitol Street, Suite 500
Jackson, MS 39201
(p) 601-965-4480
ATTORNEY FOR UNITED STATES OF AMERICA

Via U.S. First Class Mail

Robert K. Kochan, President 3401 Atlantic Avenue, Suite 101 Raleigh, NC 27604 FORENSIC ANALYSIS ENGINEERING CORPORATION, PRO SE

This 15th day of August, 2008

/S/

Maison Heidelberg MSB #9559 MAISON HEIDELBERG P.A. 795 Woodlands Parkway Suite 220 Ridgeland, MS 39157

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' 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. <u>DEFINITIONS</u>

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.
- 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. <u>DOCUMENTS REQUESTED</u>

- 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

C. MAISON HEIDELBERG, MB #9559 GINNY Y. KENNEDY, MB #102199

OF COUNSEL:

MAISON HEIDELBERG P.A. 795 Woodlands Parkway, Suite 220 Ridgeland, Mississippi 39157 Phone No. (601) 351-3333 Fax No. (601) 956-2900

August J. Matteis, Jr. (admitted *pro hac vice*)
Craig J. Litherland (admitted *pro hac vice*)
Benjamin Davidson (admitted *pro hac vice*)
GILBERT RANDOLPH LLP
1100 New York Avenue NW
Suite 700
Washington, DC 20005
Phone No. (202) 772-2200
Fax No. (202) 772-3333

Attorneys for Cori Rigsby and Kerri Rigsby

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 Rigsby CSR Access Report

McFarland Complaint Exhibit A

Policyholder Name	Policy Number	Release Date	Release Time	Signon (D
BordersRahn, Jacquelyn	24BA06058	6/2/2006	21:35:03.624	HVWZ
Garvey, Michael	24CD97373	6/2/2006	21:36:47.337	HVWZ
McNamee, Betty	24CH01723	6/2/2006	21:38:05.331	HVWZ
eelScheibengraber, Ma	24CG72629	6/2/2006	21:40:33.417	ZWVH
Williams, James	240061453	6/2/2006	21:41:34.822	HVWZ
Seals, Benny	24CW28827	6/2/2006	21:42:16.191	HVWZ
Norman, Frank	248517542	6/2/2006	21:42:56.902	HVWZ
Quave, Susan	241877772	6/2/2006	21:43:19.781	HVWZ
Pickich, Jeffrey	99CE65898	6/2/2006	21:43:41.342	HVWZ
Becker, Dorothy	24B251938	6/2/2006	21:56:55.189	HVWZ
Abels, Shirley	99CE47229	6/2/2006	21:58:38.700	HVWZ
Allen, Woody	24BW30465	6/2/2006	22:14:50.744	HVWZ
Allred, Ellen	24CA88974	6/2/2006	22:18:23.548	HWWZ
y	99B907095	6/2/2006	22:19:27.219	HVWZ
у.	99B907095	6/2/2006	22:21:50.102	HVWZ
Awad, Mohamed	24CW97745	6/2/2006	22:23:52.913	HVWZ
Baricev, Anthony	998908945	6/2/2006	22:27:40.773	HWWZ
Barlow, Hubert	240280560	6/2/2006	22:29:50.030	HVWZ
Barrett, Marie	248280579	6/2/2006	22:30:55.729	HVWZ
Barrilleaux, Robert	248702399	6/2/2006	22:34:58.743	ZWVH
Bates, Lula	248087157	6/2/2006	22:38:13.668	HVWZ
Bauge, Robert	99CT36219	6/2/2006	22:40:47.811	HVWZ
Beany, Charles	24BT91340	6/2/2006	22:43:03.713	HVWZ
Beasley, James	240753994	6/2/2006	23:15:07.985	HVWZ
Becker, Ernest	24BG70891	6/2/2006	23:16:51.635	HVWZ
Beckham, Vincent	247091085	6/2/2006	23:19:00.476	HVWZ
Belden, Mary Ellen	247103904	6/2/2006	23:23:05.683	HVWZ
Bell, Elizabeth	249734409	6/2/2006	23:24:27.933	HVWZ
Berry, Theda	240877961	6/2/2006	23:26:02.265	HVWZ
Bishop, James	247994864	6/2/2006	23:28:59.529	HVWŹ
Bitter, Lawrence	249583004	6/2/2006	23:33:37.983	HVWZ
Boggs, Archie	99BR37466	6/2/2006	23:35:11.435	HVWZ

Policyholder Name	Policy Number
Banker Downthy	242544038
Abels Shirley	990,547229
Allen, Woody	24BW30465
Alired, Ellen	
Applewhite, Joe	99B907095
Applewhite, Joe	99B907095
Awad, Mohamed	24CW97745
Baricev, Anthony	998908945
Barlow, Hubert	240280560
Barrilleaux, Robert	248702399
Bates, Luta	24BO87157
Bauge, Robert	99CT36219
Beany, Charles	248T91340
Beasley, James	240753994
Becker, Emest	24BG70891
Beckham, Vincent	247091085
Belden, Mary Ellen	247103904
Bell, Elizabeth	249734409
Berry, Thède	240877961
Bishop, James	247994864
Bitler, Lawerence	249583004
Roose Archibald	GORP 37466

Exhibit "46"

_	The state of the s		23 1/2/2016	
Policyholder Name	Policy Number	Refease Date	Release Time	Signon ID
Morrison, Wayne	24BD77659	9002/2/9	23:35:56.495	HVWZ
Boggs, Vera	248364251	6/2/2006	23:36:53.397	HVWZ
Boggs, Charles	248036204	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	09:46:55.324	HVWZ
F	240359531	6/3/2006	09:51:02.918	HWWZ
Bond, Jennifer	24CW96628	6/3/2006	09:52:57.609	HVWZ
Bosarge, Elisabeth	24B545782	6/3/2006	09:56:04.304	HVWZ
Boudreaux, Chad	99CT43252	6/3/2006	09:58:06.624	HWWZ
Bounds, Clifford	248856484	6/3/2006	10:02:32.218	HWWZ
Bradford, Lyman	990866398	6/3/2006	10:17:30.714	HVWZ
Bradley, Bruce	24BR13642	6/3/2006	10:23:00:240	HVWZ
Brandner, Michael	24CH30890	6/3/2006	10,25,44,562	HVWZ
Bradner, Michael	24CW58628	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	248520740	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	HWWZ
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
Camey, 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

Policyholder Name	Policy Number
Boggs, Charles	
Bonck, June	241851613
Bonck, Ronald	240359531
Bond, Jennifer	24CW96628
Bosard, Elizabeth	248545782
Boudreaux, Chad	99CT43252
Bounds, Clifford	248856484
Bradford, Lyman	9609086
Bradley, Bruce	24BR13642
Brandner, Michael	24CH30890
Brander, Michael	24CW58628
Branning, Kenneth	99CT20153
Brasher, Richard	241877226
Breeding, Mary	248661011
Brinkley, France	24CE76891
Broussard, Catherine	24B520740
Brown, Billy.	24CB76173
Brown, Charles	24CW15586
Brown, Marton	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	248296123
Castigliola	24BC03459

			110000	
Policyholder Name	Policy Number	Release Date	Release Time	Signon ID
Caudill, Paula	240952162	6/3/2006	12:02:58.679	HVWZ
Causey, James	24BD38745	6/3/2006	12:05:12.012	HVWZ
Chamberlain, Emest	24BH25204	6/3/2006	12:07:34.774	HVWZ
Childress, Betty	249238015	6/3/2006	12:09:09.746	HVWZ
Cirlot, Marion	24CC76643	63/2006	12:13:22,160	HVWZ
Clark, Joyce	24BZ42478	6/3/2006	12:15:01.131	HWWZ
Clark, Richard	241367287	6/3/2006	12:17:13.524	HWWZ
Gleek, Sally	24BU27615	6/3/2006	12:19:25.087	HVWZ
Coakley, Robert	990916078	6/3/2005	12:23:43.099	HWWZ
Coakley, Robert	240463695	6/3/2006	12:25:43.693	HWWZ
Cochran, Thomas	24CD64397	6/3/2006	12:27:07.506	HVWZ
Cole, Hazel	240715173	6/3/2006	12:29:22.267	HVWZ
Coleman, Charles	248\$22154	6/3/2006	12:31:02.747	HWWZ
Combs, Allyn	249942006	6/3/2006	12:33:31.750	HVWZ
Comeaux, Robert	24E087301	6/3/2006	12:35:11.871	HWWZ
Conerly, Norlan	240283388	6/3/2006	12:37:13.785	HVWZ
Coneriay, 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	24BU80263	6/3/2006	12:43:19.500	HVWZ
Craig, Elsie	248900894	6/3/2006	12:44:39.221	HVWZ
Cremer, H	24CS48453	6/3/2006	12:45:40.302	ZWVH
Cropp, Barbara	240721530	6/3/2006	12:47:17.374	HVWZ
Sims, Carlene	24CV43699	6/3/2006	12:49:28.095	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, Emmit	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

Policyholder Name	Policy Number
Caudill, Paula	240952162
Causey, James	24BD38745
Chamberlain, Ernest	24BH25204
Childress, Betty	249238015
Cirlot, Marion	24CC76643
Clark, Joyce	24BZ42478
Clark, Richard	
Claek, Sally	248U27615
Coakley, Robert	990916078
Coakley, Robert	240463695
Cochran, Thomas	24CD64397
Cole, Hazel	240715173
Coleman, Charles	248522154
Combs, Allyn	249142006F
Comeaux, Robert	24EO87301
Conerly, Norlan	240283388
Consolino, Betty	24CS79421
Costas, William	99CE69961
Cox, Albert	24BU80263
Craig, Elsie	248900894
Cremer, Harold	24CS48453
Cropp, Barbara	240721530
Curry, Edmund	24BD38188
Dambrino, Robert	
Daniel, George	24CD91242
Clarence, Davis	24BM61919
Davis, Jesse	99CE63956
Davis, Ernmit	249567544
Davis, Patricia	
Dearman, Eugene	24BP73125
Dedeaux, Manual	24CC35662
Delaughter, Danief	24CP83560

Delmas, Helen	ouch ranking	Serense Care	Kelease time	Cil double
Dellias, neien	11400000			
7	248067276	6/3/2006	13:27:22,573	HVWZ
Despone, James	24B814527	6/3/2006	13:30:15.649	HVWZ
Desport, Richard	24RC17912	6/3/2006	13:31:12.631	HVWZ
Desporte, Richard	24RC17912	9002/6/9	13:31:44,418	HVWZ
Dilley, 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	13:37:26.176	ZMÁH
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	24BW90752	6/3/2006	13:45:16.033	HVWZ
Dykes, David	24B966087	6/3/2006	13:48:08.435	HVWZ
Dykes, Tracey	24CX62236	6/3/2006	13:50:31.857	HWWZ
Eades, Walter	99BR97955	6/3/2006	13:52:36.989	HVWZ
Gospodinovich, Jane	248243255	6/3/2006	13:54:34.172	HVWZ
Ellfrift, Scott	24CL90313	6/3/2006	13:56:20.383	HVWZ
	99BX84902	6/3/2006	14:49:12.376	HVWZ
Hill, Dafe	247541509	6/3/2006	14:50:02.407	HVWZ
T	240759605	6/3/2006	14:50:58.140	HVWZ
-	24CM79476	6/3/2006	14:52:05.361	HVWZ
8	24CQ88866	6/3/2006	14:53:53.372	HVWZ
	247541509	6/3/2006	14:54:47.894	HVWZ
٦	240759605	6/3/2006	14:55:48.333	HVWZ
9	24CM79476	6/3/2006	14:56:48.334	HVWZ
	24CQ88866	6/3/2006	14:58:24.194	ZWVH
1	24BV83591	6/3/2006	14:59:26.639	HWWZ
٦	248710402	6/3/2006	15:00:24.799	HVWZ
E	241015849	6/3/2006	15:01:12.562	HWWZ
	24CS80359	6/3/2006	15:02:59.344	HVWZ
Robert	247813645	6/3/2006	15:03:58.002	HVWZ
T	99CK83292	6/3/2006	15:04:48.073	HVWZ
T	24CK10731	6/3/2006	15:05:31.045	HVWZ
둤	241054927	6/3/2006	15:06:34.786	HVWZ
	241163854	6/3/2006	15:08:42.048	HVWZ
Bukvic, James 2	4CM75656	6/3/2006	15:09:54.909	HVWZ

Policyholder Name	Policy Number
Delmas, Helen	248067276
Desporte, James	248814527
Dilley, Anita	248408211
Disalvo, Catherine	240649576
Dix, Brian	24CQ57467
Downs, Cleamon	247907650
Dunn, Richard	241458595
Dunston, Katherine	247296198
Durham, John	24BW90752
Dykes, David	
Dykes, Tracey	
Eades, Walter	99BR97955
Ellifritt, Scott	24CL90313
ALAMANANA AMAMAMA AMAM	
	

Policyholder Name	Policy Number	Vimber Deleges Onto Onto	10000	
Williams, Brenda	241251875	6/3/2006	15-10-55 000	Signor ID
Wynder, Johnnie	24E121734	6/3/2006	15-11-58 604	HVWD
O'Keeffe, Susie	24BU62442	6/3/2006	15:17:22:157	HVW7
Willis, J	99CD41122	6/3/2006	15:18:32.018	HVWZ
Krass, Thomas	240050334	6/3/2006	15:19:24.829	HVWZ
Crosby, Clifford	24BS21190	903/2/9	15:20:36,941	HVWZ
Jones, Penelope	24E077336	6/3/2006	15:21:44.030	HVWZ
Vix, Elbert	240863213	6/3/2006	15:22:33.544	HVWZ
McPeek, Owen	240512513	6/3/2006	15:23:53.842	HVWZ
Carney, Gerald	24BR09099	6/3/2006	15:24:47.273	HVWZ
Bridgewater, Gerald	24CH86823	6/3/2006	15:26:00.216	HWWZ
Prince, Randall	24BL57438	6/3/2006	15:27:28.847	HVWZ
	24BU43859	6/3/2006	16:15:26.926	HWWZ
-	24E057183	6/3/2006	16:17:52.078	HWWZ
8	24BX63199	9/3/2006	16:19:49.794	HWWZ
	24E057183	6/3/2006	16:22:35.242	HVWZ
McConnell, Janice	248703124	6/3/2006	16:23:39.943	HVWZ
Roffi, Robert	248634661	6/3/2006	16:24:45:066	HVWZ
Traylor, Pamela	24D256335	6/3/2006	16:25:36.615	HVWZ
Belsom, Edgar	24BM59624	6/3/2006	16.26.34.577	HVWZ
Monetet, Mark	24BE08176	6/3/2006	16:27:29.890	HVWZ
Flowers, Archie	241280763	6/3/2006	16:28:35,329	ZWWI
7	240031385	6/3/2006	16:29:23.059	HVWZ
_	994467926	6/3/2006	16:33:47.845	HWWZ
	248841215	6/3/2006	16:35:37,249	HVWZ
	24B250823	6/3/2006	16:36:57,108	HVWZ
1	99CR47963	6/3/2006	16:38:39.480	HVWZ
2	24E069479	6/3/2006	16:39:28.960	HVWZ
7	24CS80916	6/3/2006	16:40:32.471	HVWZ
1	24CM78765	6/3/2006	16:41:27.721	HVWZ
更	24RC23813	6/3/2006	16:43:09.124	HVWZ
\neg	24CF09878	6/3/2006	16:44:45.215	HVWZ
۶ ا	24E142512	6/3/2006	16:46:12.327	HVWZ
1	248677953	6/3/2006	16:47:21.789	HVWZ
Elfer, Stephanie	24CB50281	6/3/2006	16:48:18.608	HVWZ

⋖	
Exhibit	
plaint	
Som	
land	
AcFar	

[6	Policyholder Name Dollov M. House	Pollow Member
1		cours raminer
<u> </u>		
1		
Г		
ſ		
1		
 -		
·		
		
······		
·		

		Melli Mysuy Can Access Report	SS Kepon	
Policyholder Name	-1	Refease Date	Release Time	Cl uoubis
Ponthieux, Gary	24BU40446	6/3/2006	16:50:30.223	HWWZ
Pierce, Bertie	241840329	6/3/2006	16:51:26.292	HWWZ
Lawson, Edward	995471610	6/3/2006	16:52:31.933	HWWZ
Garcia, Arvine	240777197	6/3/2006	16:53:55.475	HVWZ
Saxton, Billy	240719563	6/3/2006	16:55:38.047	HVWZ
Miranda, Sheryi	99CE57941	6/3/2006	16:57:07.578	HVWZ
Morris, Robert	248975151	6/3/2006	16:58:23.079	HVWZ
Gentry, Fred	247504778	6/3/2006	16:59:31.600	HVWZ
Aucoin, Mary	990931992	6/3/2006	17:00:36.760	HVWZ
Moseley, Brent	Z4CS06923	6/3/2006	17:02:24.522	HVWZ
Simons, Jeffrey	99CE51316	6/3/2006	17:03:15.605	ZWWH
Lopez, Raoul	24B503732	6/3/2006	17:04:01.885	HWWZ
Evans, Norma	246033005	6/3/2006	17:05:10.589	HVWZ
Keel, Michah	24CJ13913	6/3/2006	17:06:48.677	HVWZ
Yordy, William	24CC78039	6/3/2006	17:07:58.220	HVWZ
Ellington, Michael	24RB11386	6/3/2006	17:08:48.979	HVWZ
Gemelli, Michael	240683870	6/3/2006	17:09:44.561	HVWZ
Smith, Jimmy	24CW78986	6/3/2006	17:10:50.083	HVWZ
Deaton, William	241370434	6/3/2006	17:12:44.624	HVWZ
Pisarello, J.	24BV74655	6/3/2006	17:13:20.845	HVWZ
King, Ralph	241999465	6/3/2006	17:14:05.695	HVWZ
McIntyre, L.	249737091	6/3/2006	17:15:17.516	HVWZ
Love, Rusell	24CS14537	6/3/2006	17:16:37.707	HVWZ
Schwander, Jacob	24B685978	6/3/2006	17:17:47.568	HWWZ
	24BS89104	6/3/2006	17:18:28:050	HWWZ
- [99CE23913	6/3/2006	17:26:31.968	HWWZ
	246913964	6/3/2006	17:27:43.271	HVWZ
	24BV47899	6/3/2006	17:29:16.772	HVWZ
	248795793	6/3/2008	17:31:18.553	HVWZ
	24CV28864	6/3/2006	17:32:27.504	HVWZ
	24BU07765	6/3/2006	17:34:24.357	HVWZ
	24CF82580	6/3/2006	17:35:27.348	HWWZ
	240715615	6/3/2006	17:36:31.408	HWWZ
9	241234917	6/3/2006	17:37:33.370	HVWZ
Smith, Mark	24BU82711	6/3/2006	17:38:32.250	HVWZ

Exhibit A	
Complaint	
McFarland	

Marie Name	roucy number						William Control of the Control of th																												
Policybolder Name									The second secon																A STATE OF THE STA		The state of the s		And the second s						
Signon 10	HWWZ	HVWZ	HVWZ	HVWZ	HVWZ	HVWZ	HVWZ	HVWZ	HVWZ	HVWZ	HVWZ	HVWZ	HVWZ	HVWZ	HVWZ	HVWZ	HVWZ	HVWZ	HVWZ	HVWZ	ZW/H	HVWZ	HVWZ	HVWZ	HVWZ	HVWZ	HVWZ	HVWZ	HVWZ	HVWZ	HVWZ	HVWZ	HVWZ	HVWZ	HVWZ
Time Sig	L	L	.933	5.475 F	3.047	.578 H	.079 H	H 009.	Ш	.522 H	.605 H	Ц	H 685	H 229	220 H	H 679.	561 H	083 H	624 H			516 H		4		_	_	_	553 HV	\dashv	_	_	4	_	₹ 920

Policyholder Name	Policy Number	Virmbor Deloace Date Deloace 7	Doloneo Timo	C) common
McCormick, John	24BC96202	6/3/2006	17-39-33-192	HVWZ
Pham, Nhiem	99BX94903	6/3/2006	17.40-28 853	HVW2
Mitchell, Gary	240739995	6/3/2006	17:41:26.993	HVWZ
Benandi, Ronnle	248706808	6/3/2006	17:42:46.255	HVWZ
Scardino, Maurice	240864660	6/3/2006	17:44:04.755	HVWZ
Foster, Joe	248752222	9007/2/9	17:46:24.038	HVWZ
Comar, Joe	24E124755	6/3/2006	19:07:22.851	HVWZ
Kerr, Eleanor	24CM44938	9002/2/9	19:08:08.443	HVWZ
Bonck, June	241851613	6/3/2006	19:09:21.444	HVWZ
Martinez, Henry	241052721	6/3/2006	18:10:25.526	HVWZ
Jackson, Billy	246862104	6/3/2006	19:11:51.736	HVWZ
Johnson, Darrell	24CQ86052	6/3/2006	19:13:13.287	HWWZ
Langlinais, Robley	24CS26545	6/3/2006	19:14:17.349	HVWZ
Notter, Richard	24BD61376	6/3/2006	19:16:42.032	HVWZ
Freeman, Glen	24CP96935	6/3/2006	19:18:16.503	HWWZ
Harwell, Ronnie	247335870	6/3/2006	19:19:22.885	HVWZ
Helms, Terry	240758781	6/3/2006	19:20:49.027	HVWZ
Creel, Junius	249464557	6/3/2006	19:21:42.016	HVWZ
Lyons, Mark	24BD54320	6/3/2006	19:22:40.687	HVWZ
Beckham, James	24CG35228	6/3/2006	19:24:13.909	HVWZ
Benton, Sandy	24BT64154	6/3/2006	19:25:26.061	HVWZ
Renz, Edward	249489485	6/3/2006	19:26:17.492	HVWZ
Dean, Jan	24CV93252	6/3/2006	19:34:08.331	HVWZ
Richards, Clara	247279868	6/3/2006	19:35:01.851	HVWZ
Bradley, George	24CX34148	6/3/2006	19:36:16.892	ZMVH
Dunston, Katherine	247296193	6/3/2006	19:37:07.632	HVWZ
O'Rourke, Patrick	240548230	6/3/2006	19:39:11.436	HVWZ
McCormick, John	24BC96202	6/3/2006	19:40:17.895	HVWZ
Renz, Edward	249489485	6/3/2006	20:02:46.760	HVWZ
7	24B789509	6/3/2006	20:17:54.166	HVWZ
	240427714	6/3/2006	20:20:42.196	HVWZ
٦	24CJ61181	6/3/2006	20:21:39.527	HVWZ
er.	247813645	6/3/2006	20:23:08.542	HVWZ
	24CB35215	6/3/2006	20:24:26.390	HVWZ
Eschler, Leroy	24CC74004	6/3/2006	20:25:58.802	HVWZ

Policyholder Name Policy Number	Policy Number
	ALVANDA AND AND AND AND AND AND AND AND AND
and the state of t	
	i de la compania
And the second control of the second control	
Ellis, Bobby	248789509
Elmore, Lillian	240427714
Erichsen, Robert	24CJ61181
Erichsen, Robert	247813645
Ervin, Bob	24CB35215
Eschler Lemv	24CC74004

Policyholder Name	Policy Mumber	Vimbor Delease Buth Delease	Defence Time	0, 1, 1, 1, 1
M	994669166	SIDEN SE MAIN	Conserve time	al nongie
i	COTTOOLS	CONTRACTOR	20.20.13.324	7000
Eubanks, Robert	24CD96270	6/3/2006	20:30:28.627	HVWZ
Fairleigh, Thomas	241721962	6/3/2006	20:31:43.988	ZM/JH
Falks, Curtis	24CE06312	6/3/2006	20:33:25.130	HVWZ
rrington, Charles & Jea 99CR74209	99CR74209	6/3/2006	20:35:39.671	HVWZ
Felder, John	998916599	6/3/2006	20:36:48.685	HVWZ
Felder, Doris	990899649	6/3/2006	20:38:14.686	HVWZ
Felder, John	248904284	6/3/2006	20:39:41.285	HVWZ
Feranda, Tammy	241085416	6/3/2006	20:41:28.818	HVWZ
Finch, Christopher	99CT25949	6/3/2006	20:44:29.250	HVWZ
Flint, Robert	248060109	6/3/2006	20:46:55.104	HVWZ
Flowers, Archie	241280763	6/3/2008	20:48:30.755	HVWZ
	240019188	6/3/2006	20:49:56.096	HWWZ
Foster, James	24CJ29184	6/3/2006	20:50:40.677	HVWZ
Dunkley, Patricia	24E040821	6/3/2006	20:51:48.078	HVWZ
Foster, Joe	248752222	6/3/2006	20:55:11.590	HVWZ
	24BH46335	6/3/2006	20:58:31.366	HVWZ
French, Bennie	241294394	6/3/2006	21:00:17.506	HVWZ
Gandy, John	246431821	6/3/2006	21:02:11.200	HVWZ
Garrand, Joseph	247135522	6/3/2006	21:04:11.960	HWWZ
	24BM61756	6/3/2006	21:05:26.083	HVWZ
Gautier, Lawrence	24BW18989	6/3/2006	21:06:47.144	HVWZ
George, James	248995607	6/3/2006	21:08:45.036	HVWZ
Gerad, Jacob	24BN28432	6/3/2006	21:10:00:156	HVWZ
Geroux, Alfred	249494636	6/3/2006	21:11:31.813	HVWZ
Gex, Joseph	24B209409	6/3/2006	21:13:32.970	HVWZ
Gibbons, Steven	241294634	6/3/2006	21:16:45.504	HVWZ
Gilley, Alice	990282715	6/3/2006	21:18:34.856	HVWZ
٦	247617715	6/3/2006	21:19:47.117	HVWZ
Ŋ.	240439719	6/3/2006	21:21:52.378	HVWZ
\neg	240240578	6/3/2006	21:23:47.664	HWWZ
Goodgame Betty	24BK78517	6/3/2006	21:25:46.111	HWWZ
Gordon, Samuel	24CS12851	6/3/2006	21:28:29.667	HVWZ

	Policyholder Name	Policy Number
	Eselin, Virginia	994669166
	Eubanks, Robert	24CD96270
	Fairleigh, Thomas	241721962
	Falks	24CE06312
	Farrington, Chartes & Jeanie	99CR74209
	Felder, John	99B916599
	Felder, Doris	990899649
	Felder, John	248904284
	Feranda, Tammy	
	Filnt, Robert	
	Flowers, Archie	241280763
	Forte, Joseph	240019188
	Föster, James,	
	Foster, Joe	248752222
-	Franklin, Donald	
	French, Bennie	241294394
	Gandy	
	Garrard, Joseph	247135522
	Gautter, Hermes	24BM61756
	Gauther, Lawrence	24BW18969
	George, James	24B995067
A	Geraci, Jacob	24BN28432
	Geroux, Alfred	249494636
	Gex, Joseph	24B209409
	Gibbons, Steven	241294634
······	Gilley, Alice	990282715
	William, Glenn	247617715
4	Glorvigen, Lloyd	240439719
	Goff	240240578
	Goodgame, Betty	24BK78517
	Gordan, Samuel	24CS12851