

**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

VS

CIVIL ACTION NO. 1:06-cv-00433-LTS-RHW

**STATE FARM MUTUAL INSURANCE
COMPANY, NATIONWIDE INSURANCE
COMPANY, ALLSTATE INSURANCE
COMPANY, USAA INSURANCE COMPANY,
FORENSIC ANALYSIS ENGINEERING
CORPORATION; EXPONENT FAILURE
ANALYSIS, HAAG ENGINEERING CO., JADE
ENGINEERING, RIMKUS CONSULTING
GROUP INC., STRUCTURES GROUP, E. A.
RENFROE, INC., JANA RENFROE, GENE
RENFROE and ALEXIS KING**

DEFENDANTS

**RENFROE'S RESPONSE TO
RELATORS' 7.2(h) MOTION FOR EXTENSION OF TIME TO
RESPOND TO PENDING DISPOSITIVE MOTIONS**

E. A. RENFROE & COMPANY, INC. ("Renfroe") (which, together with Jana Renfroe and Gene Renfroe, individually,¹ are sometimes collectively referred to as the "Renfroe Defendants"), files this response to the *Relators' Motion for Extension of Time to Respond to Pending Dispositive Motions* [Doc. 214] (the "Motion for Extension"), and states the following:

1. On August 15, 2008, Relators filed their *Motion for Leave to Propound Expedited Document Requests in Order to Respond to Defendant's Pending Dispositive Motions* [Doc. 212] (the "Motion for Leave"). Given that their Motion for Leave only seeks leave to request the production of documents directly from State Farm, Renfroe does not intend to respond to the

¹ The Defendants Jana Renfroe and Gene Renfroe (the "Renfroe Individuals") have challenged and continue to challenge the Court's jurisdiction over them in their individual capacities, and, therefore, do not appear for the purposes of this response.

Motion for Leave. That said, Renfroe opposes any suggestion that the Relators should be given leave of court to conduct expedited discovery from any party at this stage of the litigation.

2. With respect to the Motion for Extension, Renfroe opposes the extension to the extent that Renfroe's agreement would in any way suggest that Renfroe consents to the Relators' proposed discovery requests. Renfroe, as a courtesy to counsel opposite, does not otherwise oppose the Relators' new counsel being given an extension of time *to respond* to pending dispositive motions beyond the deadlines previously set by this Court's August 6th Order. Renfroe's agreement to a short extension should neither be read nor interpreted as constituting Renfroe's approval of or assent to the Relators being granted leave of this Court to conduct their proposed discovery which is clearly improper as shown in State Farm's response filed on August 27, 2008. [Doc. Nos. 216 & 217].

THIS, the 28th day of August, 2008.

Respectfully submitted,

E. A. RENFROE & COMPANY, INC
Defendant

BY: s/ H. Hunter Twiford, III
H. Hunter Twiford, III
One of its Attorneys

OF COUNSEL:

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CERTIFICATE OF SERVICE

I, the undersigned H. Hunter Twiford, III, McGlinchey Stafford PLLC, hereby certify that on this day, I electronically filed the foregoing with the Clerk of the Court using the ECF system, which sent notification of such filing to the following:

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and I hereby certify that I have mailed by United States Postal Service the document to the following non-ECF participants:

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THIS, the 28th day of August, 2008.

s/ H. Hunter Twiford, III

H. HUNTER TWIFORD, III

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