



Apr 23 2008
2:51PM

DISTRICT COURT COUNTY OF EL PASO STATE OF COLORADO	
Court Address: 20 E. Vermijo Street Colorado Springs, CO 80903	
Plaintiffs: MACARIO CAMUS and KRISTEN CAMUS	▲ COURT USE ONLY ▲
v.	Case No.: 05CV404
Defendants: STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY, an Illinois Insurance Company	Div.: 3 Ctrm:
Attorney: Jon F. Sands, #10680 Kimberle E. O'Brien, #15184 Fisher, Sweetbaum Levin & Sands, P.C.	
Address: 1125 17 th Street, Suite 2100 Denver, CO 80202	
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SUPPLEMENTAL RESPONSE TO PLAINTIFFS' REQUEST FOR PRODUCTION OF DOCUMENTS PURSUANT TO SPECIAL MAGISTRATE'S ORDER	

Defendant, State Farm Mutual Automobile Insurance Company, hereby submits its Supplemental Response to Plaintiffs' Request for Production of Documents as follows:

Pursuant to the Recommended Order on Plaintiffs' First Motion to Compel ("Order") dated April 15, 2008, State Farm was ordered to produce the Advancing Claims Excellence (ACE) documents identified in Exhibit 9 to Plaintiff's Reply Brief. Exhibit 9 is a Supplemental Endorsements/Disclosures of Documents ("Supplemental Disclosures") prepared by Richard M. Kaudy, Esq., in *Courtney Babcock v. State Farm Insurance Companies, et al.*, Boulder County District Court Case Number 2002CV768 dated January 12, 2004. The documents identified in the *Babcock* Supplemental Disclosures are set forth in bold face type below. The documents produced by State Farm pursuant to the Order are based on the State Farm "A" number set forth

in the *Babcock* Supplemental Disclosures. The responsive “A” number and the control number for the ACE documents produced in this matter are set forth immediately below the document identified in the *Babcock* Supplemental Disclosures.

- a. **State Farm (SF) number: A20010344, Lee Bates Number: 10578, Generic Topic: State Farm Uninsured Motorist Claim statistics;**

Documents Produced: A20010344 (CAMUS00017999PROD)

- b. **SF: A20010360, A20010366, Lee:: 10594, 10600: UM and BI statistics, average paid costs;**

Documents Produced: A20010360 and A20010366 (CAMUS00018015PROD and CAMUS00018021)

- c. **SF: A20010492, 10496, Lee: 10726, 10730: UM/BI statistics for the Mountain States and company-wide;**

Documents Produced: A20010492 and A20010496 (CAMUS00018147PROD and CAMUS00010151PROD)

- d. **SF: A20010556-67, Lee: 10786-89: Internal newsletter article announcing ACE program for Colorado, defining ACE;**

Documents Produced: A20010556 - A20010567 (CAMUS00018211PROD - CAMUS00018222PROD)

- e. **SF: A20010626, Lee: 10760: statistics specifying State Farm’s Colorado market share, amount of earned premium;**

Documents Produced: A20010626 (CAMUS00018281PROD)

- f. **SF: A20011337-38, Lee; 11521-22: Evaluation of General Damages for pain and suffering and the Proper Method of Evaluation of General Damages;**

Documents Produced: A20011337 - A20011338 (CAMUS00018992PROD - CAMUS00018993PROD)

- g. **SF: A20011348, Lee; 11582: Per Diem Method and General Damages Evaluations;**

Documents Produced: A20011348 (CAMUS00019003PROD)

- h. **SF: A20011349, Lee: 11583: How juries evaluate injury claims;**

Documents Produced: A20011349 (CAMUS00019004PROD)

- i. **SF: A20011370, Lee: 11604: notes on why people go to lawyers;**

Documents Produced: A20011370 (CAMUS00019025PROD)

- j. **SF: A20010696, Lee: 10930: Memo regarding management incentives to claim representatives for following ACE directives and continued employment with State Farm;**

Documents Produced: A20010696 (CAMUS00018351PROD)

- k. **SF: A20011305, Lee: 11539: Errors in evaluating General Damage claims;**

Documents Produced: A20011305 (CAMUS00018960PROD)

- l. **SF: A20011330, Lee: 11564: Injury evaluations must be in ranges;**

Documents Produced: A20011330 (CAMUS00018985PROD)

- m. **SF: A20009337-39, Lee: 9580-82: Chart of claims per supervisor;**

Documents Produced: A20009337 – A20009339 (CAMUS00017001PROD – CAMUS00017003PROD)

- n. **SF: A20009665, Lee: 9908: ACE Speak terminology definitions;**

Documents Produced: A20009665 (CAMUS00017329PROD)

- o. **SF: A20010151, Lee: 10384, ACE financial goals for Mountain States and reducing claim payments driven by bottom line motives;**

Documents Produced: A20010151 (CAMUS00017805PROD)

- p. **SF: A20010188, Lee: 104121, Graph showing Profitability of UM claims in Mile Hi division of Mountain States Region that includes Colorado;**

Documents Produced: A20010188 (CAMUS00017842PROD)

- q. **SF: A20008461, Lee: 8703, Chart of BI/UIM Net Indemnity Payments, average payments per claim from State Farm Research Department;**

Documents Produced: A20008461 (CAMUS00016124PROD)

- r. **SF: A20008509, Lee: 8752: ACE critically important to avoid losing ground on loss ratios;**
Documents Produced: A20008509 (CAMUS00016173PROD)
- s. **SF: A20008511, Lee: 8753: Bar chart, Auto Ratios, expense and combined ratios for Mile Hi Division within Mountain States region;**
Documents Produced: A20008511 (CAMUS00016175PROD)
- t. **SF: A20008589, Lee: 8832: Memo on how to negotiate injury claims;**
Documents Produced: A20008589 (CAMUS00016253PROD)
- u. **SF: A20008590, 94, Lee: 8833, 37: Directives on how injury negotiation solutions;**
Documents Produced: A20008590 and A20008594 (CAMUS00016254PROD and CAMUS00016258PROD)
- v. **SF: A20008679,80 Lee: 8922,23: Mile Hi estimate of policies/dollars lost from adopting ACE claim-handling process;**
Documents Produced: A20008679 – A20008680 (CAMUS00016343PROD – CAMUS00016344PROD)
- w. **SF: A20008056, 57, Lee: 8298,99: ACE project announcement;**
Documents Produced: A20008056 – A20008057 (CAMUS00015719PROD – CAMUS00015720PROD)
- x. **SF: A20008246, Lee: 8488: Closed File Review heart of ACE process;**
Documents Produced: A20008246 (CAMUS00015909PROD)
- y. **SF: A20008247-49, Lee: 8489-91: Estimate of dollars saved in BI/UM by adopting ACE claim redesign process of reducing “quality shortfalls.”**
Documents Produced: A20008247 – A20008249 (CAMUS00015910PROD – CAMUS00015912PROD)
- z. **SF: A20008251, Lee: 8509: Major Drivers causing shortfalls;**
Documents Produced: A20008251 (CAMUS00015914PROD)

- aa. **SF: A20008452A, Lee: 8694: ACE statistics on Mile Hi profits on BI claims;**
Documents Produced: A20008452 (CAMUS00016115PROD)
Comment: "A20008452A" does not exist. Based upon the *Lee* control number the correct document number is A20008452.
- bb. **SF: A20007759-60, Lee: 7999-8000: Claim-handling, agency-claims relationship;**
Documents Produced: A20007759 – A20007760 (CAMUS00015422PROD – CAMUS00015423PROD)
- cc. **SF: A20007954,55 Lee: 8198, 99: Evaluation and Negotiation improvement techniques;**
Documents Produced: A20007954 – A20007955 (CAMUS00015617PROD – CAMUS00015618PROD)
- dd. **SF: A20007121, Lee: 7357: Current Value concept described as ordinary business activity;**
Documents Produced: A20007121 (CAMUS00014781PROD)
- ee. **SF: A20006813, Lee: 7052: Defense attorney overbillings;**
Documents Produced: A20006813 (CAMUS00014473PROD)
- ff. **SF: A20006820, Lee; 7059: Adoption of Best Practices in BI/UM claims handling;**
Documents Produced: A20006820 (CAMUS00014480PROD)
- gg. **SF: A20007075, Lee: 7314: Personnel review links pay to performance;**
Documents Produced: A20007075 (CAMUS00014735PROD)
- hh. **SF: A20006783, Lee: 7027: Bar chart of shortfalls by coverages, including UM in Colorado's division;**
Documents Produced: A20006783 (CAMUS00014443PROD)
- ii. **SF: A20006784-92 Lee: 7023-31: Charts on how to maximize UM savings by lowering evaluations;**
Documents Produced: A20006784 – A20006792 (CAMUS00014444PROD –

CAMUS00014452PROD)

- jj. SF: A20006792, Lee: 7031: Ineffective negotiations resulting in higher payouts to claimants;**

Documents Produced: A20006792 (CAMUS00014452PROD)

Comment: This document is duplicative of ii. above.

- kk. SF: A20006795, Lee: 7033: Direct defense counsel to be aggressive when appropriate;**

Documents Produced: A20006795 (CAMUS00014455PROD)

- ll. SF: A20006804, Lee: 7043: Timely use of IMEs and reduction of shortfalls;**

Documents Produced: A20006804 (CAMUS00014464PROD)

- mm. SF: A20 501299, Lee: 16966: Mountain States 1999 BI statistics;**

Documents Produced: A20 501299 (CAMUS00024204PROD)

- nn. SF: A20 501305, Lee: 16972: Average life span of claim;**

Documents Produced: A20 501305 (CAMUS00024210PROD)

- oo. SF: A20 500031, Lee: 16970, Memo from Jeff Fogarty to Brian Arakaki regarding 1999 indemnity payouts and that this could be discussed in personnel evaluations;**

Documents Produced: A20 500031 (CAMUS00025208PROD)

- pp. SF: A20 500 032, Lee, 16921: Jeff Fogarty memo to Brian Arakaki regarding 1999 average indemnity payouts and that these could be discussed in personnel evaluations;**

Documents Produced: A20 500032 (CAMUS00025209PROD)

- qq. SF: A 20 500 037, Lee: 16983: December 1999 chart regarding average paid losses per coverages;**

Documents Produced: A20 500037 (CAMUS00025214PROD)

- rr. SF: A 20 500 075, Lee: 180014: Memo to “unbundled” injuries to place values on each;**

Documents Produced: A20 500075 (CAMUS00025252PROD)

- ss. **SF: A 20002409, Lee: 2660: ACE terms defined, Current Value approach explained;**

Documents Produced: A20002409 (CAMUS00010081PROD)

- tt. **SF: A2002011, Lee: 2262: Current Value explained as ordinary business activity;**

Documents Produced: A20002011 (CAMUS00009683PROD)

Comment: "A2002011" does not exist. Based upon the *Lee* control number the correct document number is A20002011.

- uu. **SF: A2002014, Lee: 2265: Why use a Current Value approach?**

Documents Produced: A20002014 (CAMUS0009686PROD)

Comment: "A2002014" does not exist. Based upon the *Lee* control number the correct document number is A20002014.

- vv. **SF: A2002017, Lee: 2268: Requiring claim representatives to establish a current value on every file;**

Documents Produced: A20002017 (CAMUS0009689PROD)

Comment: "A2002017" does not exist. Based upon the *Lee* control number the correct document number is A20002017.

- ww. **SF: A20019, 20 Lee, 2270, 71: Current Values to be set whenever files cross claim representatives desk, explaining necessary investigation;**

Documents Produced: A20002019 – A20002020 (CAMUS0009691PROD – CAMUS0009692PROD)

Comment: "A20019" and "A20020" do not exist. Based upon the *Lee* control numbers the correct document numbers are A20002019 and A20002020.

- xx. **SF: A20000349, Lee: 627: Negotiations problems with solutions;**

Documents Produced: A20000349 (CAMUS00008048PROD)

- yy. **SF: A2000350, Lee: 628: Negotiations solutions;**

Documents Produced: A20000350 (CAMUS0008049PROD)

- zz. **SF: A20013070, Lee: 13224: Chart showing millions of dollars to be “saved” by using other evaluation and negotiation strategies;**

Documents Produced: A20013070 (CAMUS0002073PROD)

- aaa. **SF: A20012683, Lee, 12917: Percent of Mile Hi Division claims overpaid annually by not employing ACE claims techniques;**

Documents Produced: A20012683 (CAMUS00020338PROD)

- bbb. **SF: A20011371, Lee, 11605: Forestalling legal actions;**

Documents Produced: A20011371 (CAMUS00019026PROD)

- ccc. **SF: A20011373, Lee 11607: Negotiations skills;**

Documents Produced: A20011373 (CAMUS00019028PROD)

- ddd. **SF: A20011389, Lee 11623: Negotiations styles;**

Documents Produced: A20011389 (CAMUS00019044PROD)

- eee. **SF: A2001397, 99, 11401, Lee 11631, 33, 35: Negotiations Tips;**

Documents Produced: A20011397, A20011399, and A20011401 (CAMUS00019052PROD, CAMUS00019054PROD, and CAMUS00019056PROD)

Comment: “A2001397” and “A2001299” do not exist. Based upon the *Lee* control numbers the correct document numbers are A20011397 and A20011399.

- fff. **SF: A2001688, 93, 98, Lee, 12922, 12927, 12932: More profits using other evaluation and negotiation practices;**

Documents Produced: A20012688, A20011693, and A20011698 (CAMUS00020343PROD, CAMUS00020348PROD, and CAMUS00020353PROD)

Comment: “A2001688”, “A2001693”, and “A2001698” do not exist. Based upon the *Lee* control numbers the correct document numbers are A20012688, A20011693, and A20011698.

- ggg. **SF: A20013070, Lee, 13224: Supervisor involvement lowers shortfalls;**

Documents Produced: A200113070 (CAMUS0002073PROD)

Comment: This document is duplicative of zz. above.

hhh. SF: A20011958, Lee, 12192: Relabeling quality payout to quality claim resolution;

Documents Produced: A20011958 (CAMUS00019613PROD)

iii. SF: A20012682, Lee, 12916, BI/UM shortfall millions of dollars to be saved by adopting other evaluation and negotiation practices.

Documents Produced: S20012682 (CAMUS00020337PROD)

jjj. SF: A20004703-13, Lee: 4953-63: Current Value requirements, set as normal business activity, supervision required to maximize dollar leakage;

Documents Produced: A20004703 - A2004713 (CAMUS00012374PROD - CAMUS00012384PROD)

kkk. SF: A20005002, Lee: 5250: ACE changes in injury reporting, evaluating general damages;

Documents Produced: A20005002 (CAMUS00012671PROD)

III. SF: A20004374, Lee: 4620: Defining ACE quality payout;

Documents Produced: A20004374 (CAMUS00012044PROD)

mmm. SF: A20004372, Lee: 4621: Focus of ACE program;

Documents Produced: A20004372 (CAMUS00012042PROD)

nnn. SF: A20004468, 69, Lee: 4718-19: ACE Concept overview;

Documents Produced: A20004468 - A20004469 (CAMUS00012139PROD - CAMUS00012140PROD)

ooo. SF: A20004470, Lee: 4720: Chart showing Potential Impacts from ACE practices;

Documents Produced: A20004470 (CAMUS00012141PROD)

ppp. SF: A20004771, Lee, 4721: Potential impact from ACE practices, dollar "savings" in millions by adopting ACE;

Documents Produced: A20004471 (CAMUS00012142PROD)

Comment: Based upon the *Lee* control number, the correct document is “A20004471” not “A20004771.”

qqq. SF: A20004774, Lee, 4724: ACE linkage with underwriting;

Documents Produced: A20004474 (CAMUS00012145PROD)

Comment: Based upon the *Lee* control number, the correct document is “A20004474” not “A20004774.”

rrr. SF: A20004479, Lee, 4729: Capturing financial opportunity is difficult without management participation;

Documents Produced: A20004479 (CAMUS00012150PROD)

sss. SF: A20004492, Lee, 4742: ACE financial results from Northeastern project as illustration for Mountain States;

Documents Produced: A20004492 (CAMUS00012163PROD)

ttt. SF: A20004495, Lee, 4745: Quality Shortfall defined in ACE terms;

Documents Produced: A20004495 (CAMUS00012166PROD)

uuu. SF: A20004585, Lee, 4835, Smart Money article, When Your Insurer Won't Pay, quoting from former State Farm claims handler Ina DeLelong;

Documents Produced: A20004585 (CAMUS00012256PROD)

vvv. SF: A20005078, Lee, 5326: Jeff Fogarty named ACE manager for Colorado;

Documents Produced: A20005078 (CAMUS00012747PROD)

www. SF: A20005461, Lee, 5709: ACE raised in litigation, may be raised in future lawsuits;

Documents Produced: A20005461 (CAMUS00013130PROD)

xxx. SF: A20005597, Lee, 5845: Jeff Fogarty memo re: ACR timeline and February 2000 date for personnel reductions;

Documents Produced: A20005597 (CAMUS00013266PROD)

- yyy. SF: A20005766, Lee, 6006: Brian Arakaki on Quality of injury payout team;**
Documents Produced: A20005766 (CAMUS00013427PROD)
- zzz. SF: A20006527, Lee 6288: Closed File Review measurements to guide future file handling;**
Documents Produced: A20006527 (CAMUS00014186PROD)
- aaaa. SF: A20006530, Lee, 6768: Claim executive compensation linked to measureable performances;**
Documents Produced: A20006530 (CAMUS00014189PROD)
- bbbb. SF: A20006535, Lee, 6773: Management compensation linked to claims performance;**
Documents Produced: A20006535 (CAMUS00014194PROD)
- cccc. SF: A20006537, Lee 6775: ACE operational goals linking quality of payout as measurement for management productivity;**
Documents Produced: A20006537 (CAMUS00014196PROD)
- dddd. SF: A20003392-98, Lee, 6376-82: Annual document destruction policy for claims and claims operations;**
Documents Produced: A20003392 – A20003398 (CAMUS00011060PROD – CAMUS00011066PROD)
- eeee. SF: A20003615-18, Lee, 3862-65: ACE Mission Statement identified;**
Documents Produced: A20003615 – A20003618 (CAMUS00011283PROD – CAMUS00011286PROD)
- ffff. SF: A20003623, Lee, 3870, Annual Opportunity Shortfall identified by adopting ACE claims practices;**
Documents Produced: A20003623 (CAMUS00011291PROD)
- gggg. SF: A2000 3625-26, Lee, 3872-73: Power Point presentation identifying the “whys” behind the numbers to focus on reducing indemnity payments;**

Documents Produced: A20003625 – A20003626 (CAMUS00011293PROD – CAMUS00011294PROD)

hhhh. SF: A20003804-05, Lee, 4056-57: ACE estimated dollar values of policies lost to other carriers because of claim handling;

Documents Produced: A20002804 – A20003805 (CAMUS00011477PROD – CAMUS00011478)

iiii. SF: A20004304(same as A2000 4293), Lee, 4283: Problems Common to all Divisions;

Documents Produced: A20004304 (CAMUS00011974PROD)

jjjj. SF: A20004036, Lee, 4285: Issues Discussion after ACE CFR program begun, criticisms of negotiations and settlement practices and how to use ACE practices to save indemnity dollars;

Documents Produced: A20004036 (CAMUS00011706PROD)

kkkk. SF: A20004040, Lee, 4289: ACE negotiation solutions to maximize dollar savings;

Documents Produced: A20004040 (CAMUS00011710PROD)

llll. SF: A20004126-7, Lee, 4308-9: Bad faith judgments/settlements coded as compensatory awards;

Documents Produced: A20004126 – A20004127 (CAMUS00011796PROD – CAMUS00011797PROD)

mmmm. SF: A20004190-91, Lee, 4439-40: BI/UM Shortfall pie chart with dollar opportunities for savings if ACE practices on negotiations, evaluations and supervision followed;

Documents Produced: A20004190 – A20004191 (CAMUS00011860PROD – CAMUS00011861PROD)

nnnn. SF: A20004257, Lee, 4506: Summary of ACE plan by area and how to maximize savings through using ACE practices;

Documents Produced: A20004257 (CAMUS00011927PROD)

oooo. SF: A20004262,64, Lee, 4511,13: ACE practices on how claim representatives can lower indemnity payments.

Documents Produced: S20004262 and A20004264 (CAMUS00011932PROD and CAMUS00011934PROD)

On April 15, 2008, Mr. Kaudy requested additional ACE documents which he stated were needed for the C.R.C.P. 30(b)(6) deposition scheduled for April 30, 2008. The requested document control numbers are set forth below in bold type. State Farm has agreed to voluntarily produce the requested documents. The responsive "A" number and the control number for the ACE documents produced are set forth immediately below the document identified in Mr. Kaudy's request.

A2000 5942

Documents Produced: A200015942 (CAMUS00021940PROD)

A2001 5896

Documents Produced: A20015896 (CAMUS00021895PROD)

A2000 9122

Documents Produced: A20009122 (CAMUS00016786PROD)

A2000 8589-8594

Documents Produced: A20008589 – A20008594 (CAMUS00016253PROD – CAMUS00016258PROD)

Comment: A20008589 produced in response to t. above. A20008590 and A20008594 produced in response to u. above.

A2000 8509-8511

Documents Produced: A20008509 – A20008511 (CAMUS00016173PROD – CAMUS00016175PROD)

A2000 7214

Documents Produced: A20007214 (CAMUS00014874PROD)

A2000 7075

Documents Produced: A20007075 (CAMUS00014735PROD)

A2000 7121

Documents Produced: A20007121 (CAMUS00014781PROD)

A2000 7133

Documents Produced: A20007133 (CAMUS00014793PROD)

A2000 7392

Documents Produced: A20007392 (CAMUS00015052PROD)

A2000 6530-6537

Documents Produced: A20006530 – A20006537 (CAMUS00014189PROD – CAMUS00014196PROD)

Comment: A20006530 produced in response to **aaaa.** above.

A2000 6783-6786

Documents Produced: A20006783 – A20006786 (CAMUS00014443PROD – CAMUS00014446PROD)

Comment: A20006783 produced in response to **hh.** above. A20006784 – A20006792 produced in response to **ii.** above.

A2000 4036-4040

Documents Produced: A20004036 – A20004040 (CAMUS00011706PROD – CAMUS00011710PROD)

A2001 3065

Documents Produced: A20013065 (CAMUS00020718PROD)

A2001 5940

Documents Produced: A20015940 (CAMUS00015940PROD)

A2001 3070

Documents Produced: A20013070 (CAMUS00020723PROD)

Comment: A20013070 produced in response to **zz.** and **ggg.** above.

A2000 8679-8680

Documents Produced: A20008979 – A20008680 (CAMUS00016343PROD – CAMUS00016344PROD)

Comment: A20008979 – A20008680 produced in response to **v.** above.

A2000 0349-0356

Documents Produced: A20000349 – A20000356 (CAMUS00008048PROD – CAMUS00008055PROD)

Comment: A20000349 produced in response to **xx.** above. A20000350 produced in response to **yy.** above.

A20 501 299

Documents Produced: A20 501299 (CAMUS00024204PROD)

Comment: A20 501299 produced in response to **mm.** above.

A20 500 031-032

Documents Produced: A20 500031 – A20 500032 (CAMUS00025208PROD – CAMUS00025209PROD)

Comment: A20 500031 produced in response to **oo.** above. A20 500032 produced in response to **pp.** above.

A20 500 075

Documents Produced: A20 500075 (CAMUS00025252PROD)

Comment: A20 500075 produced in response to **rr.** above.

A2000 1252-1258

Documents Produced: A20001252 – A20001258 (CAMUS00008942PROD – CAMUS00008948PROD)

A2000 1543

Documents Produced: A20001543 (CAMUS00009228PROD)

A2000 1556-1567

Documents Produced: A20001556 – A20001567 (CAMUS00009238PROD – CAMUS00009249PROD)

A2000 1573-1604

Documents Produced: A20001573 – A20001604 (CAMUS00009254PROD – CAMUS00009285PROD)

Respectfully submitted,

Fisher, Sweetbaum, Levin & Sands, P.C.

By: s/ Jon F. Sands
Jon F. Sands, No. 10680
Kimberle E. O'Brien, No. 15184

ATTORNEYS FOR DEFENDANT
STATE FARM MUTUAL AUTOMOBILE
INSURANCE COMPANY

CERTIFICATE OF SERVICE

I hereby certify that on the 23rd day of April 2008, a true and correct copy of the foregoing **SUPPLEMENTAL RESPONSE TO PLAINTIFFS' REQUEST FOR PRODUCTION OF DOCUMENTS PURSUANT TO SPECIAL MAGISTRATE'S ORDER** was served via Lexis/Nexis File and Serve upon the following:

Ron J. Robinson
1155 Kelly Johnson Blvd., Suite 111
Colorado Springs, CO 80920

Richard M. Kaudy
Mark A. Gould
The Kaudy Law Firm, LLC
1416 Larimer St., Suite 301
Denver, CO 80202

And was filed electronically with Rule 53 Special Master William Meyer as follows:

bmeyer@jaginc.com

s/ Carley D. Cross

I hereby certify that on the 23rd day of April 2008, a true and correct copy of the foregoing **SUPPLEMENTAL RESPONSE TO PLAINTIFFS' REQUEST FOR PRODUCTION OF DOCUMENTS PURSUANT TO SPECIAL MAGISTRATE'S ORDER** was sent via hand-delivery along with copies of all documents identified above to the following:

Richard M. Kaudy
Mark A. Gould
The Kaudy Law Firm, LLC
1416 Larimer St., Suite 301
Denver, CO 80202

s/ Carley D. Cross