

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**HOGAN LOVELLS US LLP**  
Vanessa Wells (Bar No. 121279)  
Victoria Brown (Bar No. 117217)  
855 Main Street, Suite 200  
Redwood City, California 94063  
Telephone: (650) 463-4000  
Facsimile: (650) 463-4199  
Email: vanessa.wells@hoganlovells.com  
victoria.brown@hoganlovells.com

Attorneys for Applicants  
STATE FARM GENERAL INSURANCE  
COMPANY and STATE FARM MUTUAL  
AUTOMOBILE INSURANCE COMPANY

BEFORE THE INSURANCE COMMISSIONER  
OF THE STATE OF CALIFORNIA

In the Matter of the Rate Applications of  
State Farm General Insurance  
Company, and  
State Farm Mutual Automobile  
Insurance Company,  
Applicants.

File No.: 23-563 (RFC-2024-003)  
File No.: 23-613 (RFC-2024-004)  
File No.: 23-890 (RFC-2024-005)

**STATE FARM GENERAL INSURANCE  
COMPANY AND STATE FARM MUTUAL  
AUTOMOBILE INSURANCE  
COMPANY'S PETITION FOR REVIEW  
OR RECONSIDERATION, AND  
REJECTION, OF ORDERS AWARDED  
COMPENSATION**

1 **I. INTRODUCTION**

2 State Farm Mutual Automobile Insurance Company (SFMAIC) and State Farm General  
3 Insurance Company (SFGIC) (collectively “State Farm”) hereby petition the Commissioner to  
4 review, reconsider, but in any event to reject, the three decisions issued and presented as RFC-24-  
5 003, RFC-24-004, and RFC-24-005.<sup>1</sup> These decisions are essentially duplicative. Each suffers  
6 from common defects, specifically:

- 7
- 8 • In the subject decisions, the Administrative Law Judge purports to usurp the  
9 Commissioner’s authority to approve submitted rate applications. That authority  
10 belongs to the Insurance Commissioner.
  - 11 • In the subject decisions, the Administrative Law Judge purports to exert authority  
12 beyond that assigned by statute.
    - 13 ○ An Administrative Law Judge cannot wield the Commissioner’s executive  
14 power.
    - 15 ○ An Administrative Law Judge has no authority to declare invalid a  
16 resolution process taking place prior to the Commissioner initiating a  
17 hearing.
    - 18 ○ An Administrative Law Judge is limited to issuing *proposed adjudicatory*  
19 decisions whereas the decisions challenged here purport to be final  
20 decisions, of an indeterminate nature. ALJ Proposed Decisions are not  
21 final decisions and must be submitted to the Commissioner for review and  
22 acceptance or rejection, as provided for in CIC § 1861.08(c) (incorporating  
23 certain sections of Government Code § 11517).

24 In filing this Petition, State Farm supports the letter filed by the California Department of  
25 Insurance (CDI) dated November 4, 2024, although State Farm has a different view regarding the  
26 Commissioner’s authority to delegate executive functions to the Administrative Hearing Bureau

---

27 <sup>1</sup> See accompanying Record, at Bates Nos. 00172\_AHB-00216\_AHB, 00284\_AHB-00333\_AHB, and 00398\_AHB-  
28 00445\_AHB. State Farm is lodging the Record with the Commissioner due to some confusion regarding applicable  
procedures. If this matter is controlled by the adjudicatory provisions of the APA, it would not be State Farm’s  
responsibility to present the record.

1 (AHB), and related confusion regarding application of different bodies of law that apply or do not  
2 based on application (or not) of the Administrative Procedure Act (APA) sections governing  
3 adjudicatory proceedings. Regardless, it is evident that an Administrative Law Judge never has  
4 the authority to issue a final decision in the name of the Commissioner, and certainly never has  
5 the authority to overrule a rate approval issued by the Commissioner.

6 Given the absence of authority for the three ALJ decisions, they should be a dead letter.  
7 Unfortunately, Consumer Watchdog has decided that they are valid, and has decided that it will  
8 submit settlements to the AHB for approval on its own authority, which does not actually exist.  
9 The ALJ decisions also suggest, in contradistinction to the Commissioner’s authority and  
10 prevailing practice over the last decades, that (1) there is something shady about the well-  
11 established practice for resolving virtually all “intervened-on” rate applications; and (2) random  
12 persons might collaterally attack the Commissioner’s rate approvals, in disregard of the  
13 Commissioner’s authority as an elected official, although that has never happened in the decades  
14 the current pre-hearing resolution process has been in effect.

15 For all of the reasons stated herein, State Farm requests that the Commissioner reject the  
16 ALJ’s decisions in their entirety. Notably, in none of the Requests For Compensation that were  
17 (apparently) referred to the AHB did State Farm oppose the Request For Compensation. In one,  
18 (RFC-2024-004), SFGIC asked that the decision maker clarify standards such that Consumer  
19 Watchdog would be advised in the future that it could not bill, e.g., for duplicative work. But  
20 there were no oppositions. It should be recognized that it is in this context that an Administrative  
21 Law Judge decided to upend the entire process, in effect for at least two decades, for settlement of  
22 rate applications while under review prior to any notice of hearing.

## 23 **II. BACKGROUND**

24 At issue here is the viability of the process by which rate applications in which persons  
25 have intervened can be resolved during review, without a hearing. That isn’t what was supposed  
26 to be at issue. All that was supposed to be at issue was the compensation to be awarded to  
27  
28

1 intervenor Consumer Watchdog.<sup>2</sup> The Chief ALJ, however, elected to assign to herself the job of  
2 considering whether the settlement stipulations were valid. She decided they were not, because,  
3 she reasoned, the regulations that apply to stipulations and settlements *after a hearing has*  
4 *commenced* must apply even though *no* hearing has commenced.<sup>3</sup> Since, in every case in which  
5 there is a stipulated settlement, that settlement must be presented to the Commissioner and the  
6 Commissioner must approve the rates, the ALJ has effectively challenged the Commissioner’s  
7 authority to approve rates.

8 For decades, rate applications in which a person has intervened have virtually always been  
9 resolved by stipulation of the parties, followed by approval by the Commissioner of the agreed-  
10 upon rates. The parties’ stipulation does not include fees to be paid to the intervenor. Following  
11 rate approval, the intervenor submits a Request For Compensation to the Public Advisor. The  
12 orders granting (or, on rare occasion, denying) compensation were, historically, executed by a  
13 Deputy General Counsel. The first compensation orders State Farm received that were executed  
14 by an ALJ were dated January, 2021. While this signaled some shift by the Department, the ALJ  
15 orders simply decided the compensation question—up until the sheaf of orders issued on October  
16 18, 2024. In those orders, as noted, the ALJ held invalid the longstanding process for resolving  
17 disputes over a rate application without a hearing. The ALJ held that an ALJ must approve a  
18 settlement reached by the parties *before* commencement of a hearing, under regulations that apply  
19 only once a hearing has been noticed and an ALJ appointed. By any analysis, these orders reach  
20 beyond the scope of an ALJ’s authority, and insofar as appears, well beyond the scope of the task  
21 assigned to the ALJ.

22 The authority held by an ALJ is to preside over *hearings* and issue Proposed Decisions:  
23 all tasks assigned to ALJs are “adjudicatory” in nature regardless of whether a governing statute  
24 compels APA adjudication.<sup>4</sup> The authority held by a CDI ALJ does not differ from that of an

25 \_\_\_\_\_  
26 <sup>2</sup> State Farm assumes this to be true based on CDI’s November 4, 2024 Letter to the Commissioner. Whatever  
instrument purported to appoint the AHB to decide the requests for compensation has not been made public.

27 <sup>3</sup> State Farm addressed the history of the regulations and their proper construction in its submission to the ALJ. That  
record is provided. We do not repeat that analysis here, but focus on the larger issues.

28 <sup>4</sup> See 10 CCR § 2614.1(a) (“To the extent not otherwise specified by law or regulation, the administrative law judge  
or hearing officer shall: control the course of proceedings; grant or deny requests for continuances; administer oaths;

1 Office of Administrative Hearings (OAH) ALJ (see footnote 3); rather, certain Insurance Code  
2 statutes allow the Commissioner to choose *either* a CDI ALJ *or* an OAH ALJ in some  
3 circumstances. See CIC §§ 742.37, 769.86, 790.05, 790.06(a), 790.07, 790.15(c), and  
4 1861.08(a).<sup>5</sup> An ALJ cannot approve settlements (only the Commissioner can approve  
5 settlements)<sup>6</sup>, and by the same token cannot *dis*approve settlements pursuant to which the  
6 Commissioner has approved rates. The Commissioner cannot delegate *executive* powers to an  
7 ALJ, whose job it is to preside over *adjudicatory* hearings, i.e., hearings that involve the  
8 functions identified by regulation 10 CCR 2614.1(a).<sup>7</sup>

9 For all of these reasons, discussed further below, State Farm believes the Commissioner  
10 must reject the ALJ’s decisions. As noted, State Farm did not oppose any of the Requests For  
11 Compensation, although SFGIC did ask that billing standards be clarified as guidance for future  
12 Requests. Nonetheless, since the ALJ decisions cannot, *as presented as final and conclusive*, be  
13 reconciled with any appropriate assignment of authority to the AHB, State Farm believes it must  
14 await orders properly issued by the Commissioner or a person within the Department to whom the  
15 Commissioner’s authority can be lawfully delegated.

16  
17  
18  
19 \_\_\_\_\_  
20 issue subpoenas; rule on motions to compel discovery; receive evidence; upon notice, hold appropriate conferences  
21 before or during hearings; rule upon all objections or motions which do not involve final determinations of  
22 proceedings; receive offers of proof; hear argument; recommend to the Commissioner approval or disapproval of  
23 proposed stipulations and settlements; and fix the time and place for the filing of briefs.”); see also 10 CCR §  
24 2654.1(a) (same).

25 <sup>5</sup> See also the legislative history of AB 3023 (Exhibits A- G of the accompanying Request for Official Notice and  
26 Declaration of Vanessa Wells). Enacted in 2002, AB 3023 added section 21.5 to the Insurance Code to ensure that  
27 ALJs from the CDI also are authorized to hear cases involving unfair competition or unfair practices under the  
28 Insurance Code. AB 3023 did not confer any executive or quasi-legislative authority upon ALJs appointed by the  
Commissioner.

<sup>6</sup> See CIC § 12921(b)(1)(A) (the Commissioner may delegate the power to negotiate settlements to designated deputy  
commissioners but may not delegate the *authority to approve* a settlement with an insurer).

<sup>7</sup> See CIC § 7, which allows an officer’s powers to be exercised by a deputy, “or by a person authorized *pursuant to  
law* by the officer, unless it is expressly otherwise provided.” (emphasis added) A CDI ALJ cannot be authorized  
“pursuant to law” to exercise executive powers, anymore than an OAH ALJ could be so authorized. An agency—i.e.  
the Commissioner—may *choose* an adjudicatory process to resolve matters where an APA hearing is not required by  
statute (*cf.* Government Code § 11415.10(a)), and assign an ALJ for that purpose, but may not delegate the executive  
power to an ALJ, who is not part of the executive function.

1 **III. DISCUSSION**

2 **A. Proposition 103 Makes “Insurance Commissioner” An Elected Position And Assigns**  
3 **Authority To Approve Rates To That Official. The Commissioner Holds The**  
4 **Authority To Approve Rates Without A Hearing, Including Pursuant To**  
5 **Compromise.**

6 Proposition 103 made the Insurance Commissioner accountable to the people of the State  
7 of California by making “Commissioner” an elected position. See CIC § 12900(a), “The  
8 commissioner shall be elected by the people in the same time, place and manner as the Governor  
9 not to exceed two four-year terms.” (added by Proposition 103) In that office, the Commissioner  
10 has broad authority—bounded by statute, but still broad—to take “whatever steps are necessary to  
11 reduce the job [of rate regulation] to a manageable size.” *Calfarm Ins. Co. v. Deukmejian*, 48  
12 Cal. 3d 805, 824 (1989). “The job” has proved formidable, and would not be manageable without  
13 resolution of most rate applications in the course of pre-hearing review. Indeed, the California  
14 Supreme Court relied on the Commissioner’s ability to resolve rate applications without a hearing  
15 in holding that Proposition 103 did not overly encumber insurers through burdensome  
16 processes—which could violate Due Process requirements—*because* very few rate applications  
17 would have to be resolved through a hearing. *Calfarm*, 48 Cal. 3d at 824.

18 That is, not only does Proposition 103 *not* compel the Commissioner to hold a hearing in  
19 order to approve rates, it appears from *Calfarm* that this flexibility preserved the Proposition  
20 against a Due Process challenge. It bears repeating that the task of rate regulation would not only  
21 be “[un]manageable” without the developed settlement process, it would be impossible: other  
22 than by simply giving way to the “deemer” process included by statute. This includes the 180  
23 day deemer, which applies even as to rate applications requesting a rate greater than the  
24 thresholds stated in CIC § 1861.05(c)(3) (“*In any event*, a rate change application *shall be*  
25 *deemed approved* 180 days after the rate application is received by the commissioner (A) unless  
26 the rate change application has been disapproved by the commissioner subsequent to a hearing, or  
27 (b) extraordinary circumstances exist.” (emphasis added)) *None of* the rate applications at issue  
28 were resolved or noticed for hearing within 180 days after the rate applications were received by  
the Commissioner, and they would have been resolved by deemer without the longstanding

1 process, which includes “waiver” of the deemer.

2 The fundamental flaw in the ALJ’s decisions is the premise, contrary to law and actual  
3 practice, that the rate approval process is not full, fair, thorough, complete, and transparent,  
4 without ALJ review. That is far from the truth. CDI has substantially increased its staff of  
5 actuaries (initially, there was one) and Rate Division staff thoroughly reviews every rate  
6 application. That review plays out through the “objection and response” process in SERFF,  
7 which is public and observable by anyone with the interest to check in via the CDI website virtual  
8 viewing room. Every single concern raised by CDI staff can be reviewed and traced through by  
9 following the rate application on SERFF. When an intervenor has submitted a petition for leave  
10 to intervene and petition for hearing, CDI hosts meetings amongst all of the parties to discuss the  
11 parties’ differences. CDI circulates a chart showing a comparison of the parties’ indications  
12 down to the level of the different rate components driving the ultimate indication. The parties  
13 then discuss those differences and similarities, with the actuaries explaining what they see as the  
14 key issues. If the parties can reconcile their differences, there is a “settlement stipulation.” If the  
15 parties cannot, either the Commissioner approves a rate over objection, or, if the rate is above the  
16 levels set forth in CIC § 1861.05(c), the Commissioner issues a Notice of Hearing.

17 To underscore, as in any case, administrative or civil, the point of a hearing is to resolve  
18 disputes. If there is not a dispute, there is no need for a hearing.

19 State Farm agrees with CDI that the regulations as amended in 2006 (to provide for  
20 compensation at the pre-hearing resolution stage) expressly allowed for that negotiation stage to  
21 exist. All of 10 CCR §§ 2652.5, 2653.3 and 2653.4 provide that Petitions for Hearing, the CDI’s  
22 response to any such Petition, and an Answer to a Petition for Hearing by the Applicant “shall not  
23 be filed with the Administrative Hearing Bureau.” That is to make room for a pre-hearing phase  
24 by which rate applications may be resolved, without need for a hearing. After all, the entire point  
25 of the 2006 regulations was to allow intervenors to be compensated for their work during the pre-  
26 hearing negotiation and resolution phase. There would have been no need for amendment to  
27 allow for compensation if that stage didn’t exist, and all applications were, rather, resolved  
28

1 pursuant to “hearings” in which ALJs are appointed.

2           The ALJ decisions point to a short passage in *Association of California Insurance*  
3 *Companies v. Poizner*, 180 Cal. App. 4<sup>th</sup> 1029 (2009), in which the Court addresses an allegation  
4 by appellants that the regulatory amendments (allowing compensation to consumers for  
5 participation in the pre-hearing negotiation process) would allow “backroom” deals. *Id.* at 1052.  
6 From that day to this, or rather until the October 18, 2024 decisions, at no time did anyone ever  
7 suggest that the established process for resolving rate applications without a hearing constituted a  
8 “backroom scenario”. *See* October 18, 2024 Decisions Awarding Compensation in RFC-24-003  
9 (at p. 28), RFC-24-004 (at p. 34), and RFC-24-005 (at p. 33) (Bates Nos. 00199\_AHB,  
10 00317\_AHB, and 00430\_AHB of accompanying Record). Allowing compensation to  
11 intervenors when applications are resolved before a hearing—which means *before a Notice of*  
12 *Hearing triggering appointment of an ALJ*—was the whole point of the 2006 amendments. If a  
13 process is sufficiently open that it allows for compensation to intervenors for their contributions,  
14 it is hard to see how that can be a “backroom scenario.”

15           The regulatory amendments are designed specifically to allow for intervention in the  
16 prehearing process. The object of that process is to establish a means for efficient resolution of  
17 rate applications by allowing for resolution by settlement rather than hearing. As quoted by the  
18 Court in *ACIC v. Poizner* (from the Initial Statement of Reasons): “‘It has been the Department’s  
19 practice to encourage consumer representatives and applicants to resolve rate challenges  
20 informally so as to avoid engaging in lengthy formal hearings that benefit no one.’” 180 Cal.  
21 App. 4<sup>th</sup> at 1040. As a part of that informal process, it is perfectly lawful for an intervenor to  
22 compromise. An intervenor may object (for example) to a proposed 25% increase, but agree (for  
23 example) that a 20% increase is justified, following review of relevant information. It matters not  
24 whether the intervenor is or is not permitted to withdraw a pleading, the intervenor certainly can  
25 say that it does not object to an increase at the lower level, and therefore no longer requests a  
26 hearing. CIC § 1861.05(c)(3) *does not* say there must be a hearing every time a rate application  
27 proposes a rate above the threshold percentages. It says there must be a hearing “upon a timely  
28



1 request.” If the intervenor is satisfied by the compromise and is no longer requesting a hearing,  
2 there is no difference between the application at issue, and one which similarly requested an  
3 increase above the threshold, but garnered no request for hearing. If the voters had intended a  
4 mandatory hearing (as would be the case if there must be a hearing even though the intervenor  
5 withdrew its request), they would have said so.

6 Proposition 103 intends and anticipates that the elected Insurance Commissioner protect  
7 the rights of California consumers. Through the long-established process for settlement of  
8 contested rate applications, the Commissioner does just that, exactly as the Commissioner does  
9 when no person intervenes. With or without an intervenor, the public’s interests are unchanged,  
10 and cannot be said to be harmed by the Commissioner’s adherence to a decades old process.

11 **B. ALJs Act As Hearing Officers And Cannot Issue Final Decisions.**

12 An ALJ acts as a hearing officer but is separate from other agency officials and does not  
13 have executive or quasi-legislative functions. CIC § 21.5 authorizes the Commissioner to appoint  
14 ALJs to be employed by the Administrative Hearing Bureau, a unit within CDI whose purpose is  
15 to provide administrative hearings. Under CIC § 21.5(b), to maintain separation of functions,  
16 ALJs are not to be supervised by the Commissioner. The CDI and its appointed ALJs are subject  
17 to the administrative adjudication provisions of the Government Code, which apply to all state  
18 agencies “except as otherwise expressly provided by statute”. Gov. Code § 11310.20(a).<sup>8</sup> As  
19 with regular judges and underscoring their quasi-judicial function, ALJs are subject to the Code  
20 of Judicial Ethics. Gov. Code § 11475.20.

21 Similar to a judge in a court, ALJs typically preside over adjudicative hearings.  
22 Government Code § 11405.20 defines an “Adjudicative proceeding” as meaning “an evidentiary  
23 hearing for determination of facts pursuant to which an agency formulates and issues a decision”.  
24 But, pursuant to Government Code § 11517(c)(1) and (2), an ALJ’s decision following an

25 \_\_\_\_\_  
26 <sup>8</sup> See also Gov. Code § 11415.10 (a) (“The governing procedure by which an agency conducts an adjudicative  
27 proceeding is determined by the statutes and regulations applicable to that proceeding. If no other governing  
28 procedure is provided by statute or regulation, an agency may conduct an adjudicative proceeding under the  
administrative adjudication provisions of the Administrative Procedure Act.”); Gov. Code § 11415.20 (“A state  
statute or a federal statute or regulation applicable to a particular agency or decision prevails over a conflicting or  
inconsistent provision of this chapter.”).

1 adjudicative hearing presided over solely by the ALJ is not final but is a proposed decision that  
2 must be submitted to the agency head for final decision. These statutes do not apply here because  
3 there was no notice of hearing.

4 **C. Other Authority That Could Apply Here And What It Would Allow**

5 State Farm and the other insurers were not privy to whatever instrument the Commissioner  
6 used to convey authority to the AHB to decide intervenor requests for compensation. The  
7 insurers therefore have no idea what the Commissioner’s conveyance of authority says or  
8 authorizes. Faced with that situation, State Farm and the other insurers can only analyze the law  
9 and make deductions about what was done from what the law allows. Based on this analysis, it  
10 appears that the Commissioner lawfully could have a procedure whereby ALJ’s review requests  
11 for compensation and issue proposed decisions for the Commissioner’s review. But by law,  
12 ALJs cannot issue final decisions on requests for compensation since the Commissioner is  
13 statutorily required to decide requests for compensation: *See* CIC § 1861.10(b) (“The  
14 commissioner or a court shall award reasonable advocacy and witness fees and expenses to any  
15 person who demonstrates that (1) the person represents the interests of consumers, and, (2) that he  
16 or she has made a substantial contribution to the adoption of any order, regulation, or decision by  
17 the commissioner or a court. “).

18 Other APA statutes authorize the Commissioner to resolve matters without having a  
19 hearing. Importantly, Government Code § 11415.60 authorizes decision by settlement “without  
20 conducting an adjudicative proceeding”. Pursuant to § 11415.60(b), “a settlement may be made  
21 before or after issuance of an agency pleading” and “before, during or after the hearing”.<sup>9</sup>

22 In addition, under Government Code § 11415.50, agency heads “may provide any  
23 appropriate procedure for a decision for which an adjudicative proceeding is not required”. This  
24 provision presumably would authorize the Commissioner to refer intervenor requests for  
25 compensation to ALJs for initial review and issuance of a proposed decision. But the ALJ’s  
26

---

27 <sup>9</sup> Subsection (c) of Government Code § 11415.60 also specifies that “an agency head may delegate the power to  
28 approve a settlement”. But in the situation presented here, the controlling statute is CIC § 12921(b)(1)(A), which  
precludes the Commissioner from delegating approval of a settlement involving an insurer.

1 decision can only be a proposed one because, as stated above, under CIC § 1861.10(b), the final  
2 decision on an intervenor’s request for compensation must be made by the Commissioner. Here,  
3 the ALJ’s October 18, 2024 Decisions on Consumer Watchdog’s requests for compensation are  
4 not termed “Proposed Decision”. Instead each is titled “Decision Denying Request For  
5 Compensation”, thereby purporting to be final. They thus are unlawful.

6 **V. PRAYER FOR RELIEF**

7  
8 For all the foregoing reasons, State Farm respectfully requests that the Commissioner  
9 GRANT the Petition For Review Or Reconsideration, And Rejection Of ALJ Orders Awarding  
10 Compensation in full and that the Commissioner issue orders rejecting the ALJ’s decisions  
11 presented as RFC-24-003, RFC-24-004, and RFC-24-005 in their entirety.<sup>10</sup>

12  
13 Dated: November 12, 2024

HOGAN LOVELLS US LLP

14  
15 By: */s/ Vanessa O. Wells*

16 Vanessa O. Wells  
17 Victoria C. Brown  
18 Attorneys for Applicants  
19 STATE FARM GENERAL INSURANCE  
20 COMPANY and STATE FARM  
21 MUTUAL AUTOMOBILE INSURANCE  
22 COMPANY

23  
24  
25 <sup>10</sup> While we might prefer a more nuanced approach, if the APA applies (and the Department cites APA statutes as  
26 applicable) the Commissioner, other than rejecting the ALJ’s Decisions, has only three options: 1) adopt the  
27 Decisions in their entirety; 2) make technical or other minor changes in the Decisions; or 3) reduce or otherwise  
28 mitigate the penalty and adopt the balance of the Decisions. *See* Insurance Code § 1861.08(c) and Government Code  
§ 11517 as it existed at the time Insurance Code § 1861.08 was amended in August, 1996 and operative July 1, 1997  
(Exhibit H to RON). Consequently, the Commissioner must reject the Decisions in their entirety. State Farm would  
like to close out these matters with a final order on compensation, which presumably can be accomplished quickly.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**PROOF OF SERVICE**

I, Cathy Perry, declare:

I am employed in the County of San Mateo, State of California. I am over the age of eighteen years and not a party to the within-entitled action. My business address is 855 Main Street, Suite 200, Redwood City, California 94063. On November 12, 2024, I caused the foregoing document(s) described as:

**STATE FARM GENERAL INSURANCE COMPANY AND STATE FARM MUTUAL  
AUTOMOBILE INSURANCE COMPANY'S PETITION FOR REVIEW OR  
RECONSIDERATION, AND REJECTION, OF ORDERS AWARDING  
COMPENSATION**

to be served on the interested parties in this action as follows:

- If electronic-mail service is indicated, by causing a true copy to be sent via electronic transmission from Hogan Lovells US LLP's computer network in Portable Document Format (PDF) this date to the email address(es) stated, to the attention of the person(s) named.
- If Electronic Filing Service (EFS) is indicated, I electronically filed the document(s) with the Clerk of the Court by causing the documents to be sent to One Legal, the Court's Electronic Filing Services Provider for electronic filing and service. Electronic service will be effected by One Legal's case-filing system at the electronic mail addresses indicated on the attached Service List.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on November 12, 2024, at Sparks, Nevada.

*Cathy Perry*  
\_\_\_\_\_  
Cathy Perry

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**SERVICE LIST**  
*In the Matter of the Request for  
Compensation of CONSUMER WATCHDOG*  
**File No.: 23-563 (RFC-2024-003) (PA-2023-00006)**  
**File No.: 23-613 (RFC-2024-004) (PA-2023-00007)**  
**File No.: 23-890 (RFC-2024-005) (PA-2023-00012)**

<p><b><u>Via E-Mail</u></b></p> <p>Harvey Rosenfield  Pamela Pressley  Benjamin Powell  Ryan Mellino  <b>CONSUMER WATCHDOG</b>  6330 South San Vicente Blvd., Suite 250  Los Angeles, CA 90048  Telephone: (310) 392-0522  Fax: (310) 392-0156  Email: harvey@consumerwatchdog.org  pam@consumerwatchdog.org  ben@consumerwatchdog.org  ryan.m@consumerwatchdog.org</p>	<p><i>Attorneys for Intervenor Consumer Watchdog</i></p>
<p>Heather Hoesterey, Deputy General Counsel  Nikki McKennedy, Assistant Chief Counsel  Sara Ahn  Daniel Wade  Elsa Carre  Lisbeth Landsman-Smith  Melissa Wurster  Deirdre Digrande  Tina Warren  <i>Rate Enforcement Bureau</i>  <b>CALIFORNIA DEPARTMENT OF INSURANCE</b>  1901 Harrison Street, 4th Floor  Oakland, CA 94612  Tel No.: (415) 538-4111  Fax No.: (510) 238-7830  Email: Heather.Hoesterey@insurance.ca.gov  Nikki.McKennedy@insurance.ca.gov  Sara.Ahn@insurance.ca.gov  Elsa.Carre@insurance.ca.gov  Daniel.Wade@insurance.ca.gov  Lisbeth.Landsman@insurance.ca.gov  Melissa.Wurster@insurance.ca.gov  Deirdre.Digrande@insurance.ca.gov  Tina.Warren@insurance.ca.gov</p>	<p><i>Courtesy Copy via E-Mail</i></p>

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

<p>Jon Phenix, Public Advisor &amp; Attorney III <i>Office of the Special Counsel</i> <b>CALIFORNIA DEPARTMENT OF INSURANCE</b> 300 Capitol Mall, 17th Floor Sacramento, CA 95814 Tel. No.: (916) 492-3705 Fax No.: (510) 238-7830 Email: Jon.Phenix@insurance.ca.gov</p>	<p><i>Courtesy Copy via E-Mail</i></p>
<p>Camille Johnson Florinda Cristobal <i>Administrative Hearing Bureau</i> <b>CALIFORNIA DEPARTMENT OF INSURANCE</b> 1901 Harrison Street, 4th Floor Oakland, CA 94612 Tel. No.: (916) 492-3705 Fax No.: (510) 238-7830 Email: Camille.Johnson@insurance.ca.gov Florinda.Cristobal@insurance.ca.gov</p>	<p><i>Courtesy Copy via E-Mail</i></p>