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BEFORE THE INSURANCE COMMISSIONER
OF THE STATE OF CALIFORNIA

In the Matter of the Rate Applications of

State Farm General Insurance
Company,

Applicant.

File Nos.: PA-2024-00011, PA-2024-00012,
PA-2024-00013

**CONSUMER WATCHDOG'S RESPONSE
TO MOTION TO EXTEND THE
DISCOVERY DEADLINES TO ALLOW
FOR LIMITED ADDITIONAL
DISCOVERY**

1 In response to the Order issued by Administrative Law Judge Seligman on July 15, 2025,
2 Consumer Watchdog submits this response to Merritt David Farren’s Motion to Extend the
3 Discovery Deadlines to Allow for Limited Additional Discovery (“Motion”).

4 As Consumer Watchdog has consistently maintained, Proposition 103 affords broad
5 rights of public participation in Department proceedings to enforce the voters’ mandates,
6 providing that “the scrutiny of consumer representatives is an important tool to ensure that
7 applicants comply with the statutory and regulatory prohibition on ‘excessive, inadequate, and
8 unfairly discriminatory’ rates, or rates that otherwise violate the law.” (*Assn. of California Ins.*
9 *Cos. v. Poizner* (2009) 180 Cal.App.4th 1029, 1041.) As the Administrative Law Judge has
10 permitted Mr. Farren to intervene in these proceedings, Consumer Watchdog has no objection to
11 permitting Mr. Farren to serve limited additional discovery in this matter.

12 Mr. Farren was granted intervention in these proceedings on July 3, 2025, after the
13 June 30, 2025 stipulated deadline to serve discovery had passed. Mr. Farren has therefore not had
14 any opportunity to propound discovery in furtherance of the issues he intends to raise at the rate
15 hearing.

16 To protect Mr. Farren’s meaningful participation as a Party, Consumer Watchdog does
17 not object to Mr. Farren serving reasonable additional discovery. As always in these proceedings,
18 discovery under Government Code section 11507.6 is to be “liberally construed” (10 CCR
19 § 2655.1(a)). Here, discovery is still underway, and pre-hearing deadlines—and even the hearing
20 date itself—are still being set and reset. This is not a situation where discovery has been closed
21 for months and the parties are on the literal eve of the hearing. Applying this liberal standard,
22 and recognizing the practical implications of Mr. Farren’s intervention being granted just three
23 days after the discovery cut-off, there is ample good cause to reopen discovery for the limited
24 purpose of allowing Mr. Farren to propound discovery (or for any party to seek discovery from
25 Mr. Farren). At this time, no party has indicated that they have completed compilation of, let
26 alone produced, documents and information responsive to other parties’ discovery requests, so
27 there does not appear to be any significant risk of delaying the proceedings by permitting Mr.
28 Farren to engage in his own reasonable discovery. Indeed, Mr. Farren has indicated in his Motion

1 that his anticipated discovery will be limited in scope and will not impact the overall schedule,
2 which he well understands the Parties have made great efforts to continue to negotiate (and a
3 process in which he has participated in the past week).


4 The Administrative Law Judge correctly allowed Mr. Farren's intervention. Applying the
5 Government Code to liberally allow his discovery—while discovery is still underway—would
6 likely allow Mr. Farren's intervention to be targeted to issues he seeks to raise in this matter, not
7 create undue prejudice to any other party, and gain efficiencies at the hearing itself for all parties
8 and the Court. Particularly given Mr. Farren's assurances, Consumer Watchdog believes the
9 Administrative Law Judge should grant the Motion.

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11
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13 DATED: July 18, 2025

Respectfully submitted,

14 Harvey Rosenfield
15 Pamela Pressley
16 William Pletcher
17 Benjamin Powell
18 Ryan Mellino
19 CONSUMER WATCHDOG

20 By:



21 Benjamin Powell
22 Attorneys for CONSUMER WATCHDOG
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**PROOF OF SERVICE
BY OVERNIGHT OR U.S. MAIL, FAX TRANSMISSION,
EMAIL TRANSMISSION AND/OR PERSONAL SERVICE**

State of California, City of Los Angeles, County of Los Angeles

I am employed in the City and County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 6330 South San Vicente Boulevard, Suite 250, Los Angeles, California 90048, and I am employed in the city and county where this service is occurring.


On July 18, 2025, I caused service of true and correct copies of the document entitled

**CONSUMER WATCHDOG'S RESPONSE TO MOTION TO EXTEND THE DISCOVERY
DEADLINES TO ALLOW FOR LIMITED ADDITIONAL DISCOVERY**

upon the persons named in the attached service list, in the following manner:

1. If marked FAX SERVICE, by facsimile transmission this date to the FAX number stated to the person(s) named.
2. If marked EMAIL, by electronic mail transmission this date to the email address stated.
3. If marked U.S. MAIL or OVERNIGHT or HAND DELIVERED, by placing this date for collection for regular or overnight mailing true copies of the within document in sealed envelopes, addressed to each of the persons so listed. I am readily familiar with the regular practice of collection and processing of correspondence for mailing of U.S. Mail and for sending of Overnight mail. If mailed by U.S. Mail, these envelopes would be deposited this day in the ordinary course of business with the U.S. Postal Service. If mailed Overnight, these envelopes would be deposited this day in a box or other facility regularly maintained by the express service carrier, or delivered this day to an authorized courier or driver authorized by the express service carrier to receive documents, in the ordinary course of business, fully prepaid.

I declare under penalty of perjury that the foregoing is true and correct. Executed on July 18, 2025 at Los Angeles, California.



Kaitlyn Gentile

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