



August 11, 2025

Via Electronic Mail

Hon. Karl Fredric J. Seligman
Administrative Law Judge
Administrative Hearing Bureau
California Department of Insurance
1901 Harrison Street, 3rd Floor
Oakland, California 94612

**Re: *In the Matters of the Rate Applications of State Farm,*
File Nos.: PA-2024-00011, PA-2024-00012, PA-2024-00013**

Dear Judge Seligman:

Consumer Watchdog responds to State Farm General's August 8, 2025 letter, and in particular its "third" point concerning witness designations, which were due last Friday, August 8.

State Farm asserts—without any basis in fact—that Consumer Watchdog has taken the position that State Farm must "give up work product protection" and therefore "designate" as witnesses individuals presently serving solely as non-testifying consultants. That is not our position, and we have never articulated such a position in this proceeding. We have not demanded identification of consulting experts, nor sought to abrogate legitimate work-product protections.

Our position is far narrower and firmly grounded in the applicable regulations: State Farm was required to comply with the procedural rules for timely designating those witnesses it actually intends to call to testify by the required deadline, August 8, so that all parties have a fair opportunity to prepare for cross-examination in accordance with the Scheduling Order and the law. Nothing more, nothing less.

State Farm's misstatement of our position should not be allowed to create a distraction or provide an excuse for late disclosure of witnesses. Timely disclosure is essential to ensure that all parties have a fair opportunity to prepare and that the hearing proceeds in an orderly manner, consistent with the protections the regulations afford to all parties.

We will further address the substantive witness designation issues at the appropriate time, but we cannot allow an erroneous statement of our position to stand uncorrected.

Respectfully submitted,


William Pletcher
Litigation Director

**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 August 11, 2025, I caused service of true and correct copies of the document entitled

CONSUMER WATCHDOG LETTER TO ALJ SELIGMAN

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

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I declare under penalty of perjury that the foregoing is true and correct. Executed on August 11, 2025 at Los Angeles, California.


Kaitlyn Gentile

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