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September 12, 2025

Via Electronic Mail

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

Re: In the Matter of the Rate Applications of State Farm General Insurance
Company, File Nos: PA-2024-00011, PA-2024-00012, PA-2024-00013

Dear Administrative Law Judge Seligman:

As a general matter, we represent State Farm Mutual Automobile Insurance Company ("State Farm Mutual"), in regulatory matters, in addition to State Farm General Insurance Company ("State Farm General"). State Farm General is a party to the above rate applications and proceedings, while State Farm Mutual is not. State Farm Mutual submits this letter to inform the Court that State Farm Mutual and its affiliates assert trade secret and other statutory protections with respect to materials sought in discovery by Consumer Watchdog, as explained in the declarations supporting State Farm General's opposition to Consumer Watchdog's motion to compel.

As noted in the declarations, in some instances there are trade secrets at issue owned by State Farm Mutual. With no desire to add any additional burden to these proceedings, State Farm Mutual stands ready to enter an appearance for the limited purpose, as this court may deem necessary in order to protect State Farm Mutual's trade secrets.

We are cognizant of this Court's September 5, 2025 Order. See Order at 3 (citing caselaw holding that a party's interests with respect to the protection of confidential information may be "adequately represented by existing parties"). State Farm Mutual believes its interests are adequately represented by State Farm General, and thus does not seek to intervene in these proceedings at this time, but reserves the right to seek intervention if it becomes necessary to protect the interests of State Farm Mutual or its affiliates.

Sincerely,

A handwritten signature in blue ink, appearing to read "Vanessa Wells".

Vanessa Wells
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cc: All Parties On Service List

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Hon. Karl Frederic J. Seligman
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