

October 27, 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 Judge Seligman:

We write on behalf of State Farm General Insurance Company (“State Farm General”) in connection with Consumer Watchdog’s filing this afternoon of a chart titled “Status of Consumer Watchdog’s Outstanding Discovery Requests.” State Farm General writes to inform the Court that this chart contains the positions of Consumer Watchdog, not State Farm General, and respectfully refers the Court to the Joint Statement for a summary of both sides’ positions. In particular, Consumer Watchdog has included a “notes” column in its chart that contains Consumer Watchdog’s position, but not State Farm General’s position, and has also included argumentative points in the “narrowed request” column. State Farm General respectfully asks that the Court consult the Joint Statement, rather than Consumer Watchdog’s chart, for the parties’ positions.

State Farm General also notes that Consumer Watchdog’s chart does not appear to reflect the current status of State Farm General’s production, and State Farm General files this letter and the attached chart to clarify that issue. In particular, State Farm General calls the Court’s attention to the following:

- With respect to Requests 8, 9, 13, 14, 15, 27, 32, 36, 37, 40, and 60, Consumer Watchdog’s chart could be read to suggest that State Farm General may be producing additional documents. State Farm General completed production as of Friday, October 24, as noted in the attached chart.
- With respect to Requests 20, 29, 31, and 38, Consumer Watchdog’s chart could be read to suggest that State Farm General has not produced all responsive documents, including those that may be publicly available. State Farm General’s chart clarifies that it has no further documents to produce.

For the Court’s convenience, State Farm General has included a column in the attached chart noting where it has already produced documents.

Sincerely,

/s/ Katie Wellington

Katie Wellington

Partner
katherine.wellington@hoganlovells.com
D (617) 707-7745

cc: All Parties on Service List

cc:

SERVICE LIST
All service via e-mail

Administrative Hearing Bureau:

Hon. Karl Frederic J. Seligman
Administrative Law Judge
Administrative Hearing Bureau
CALIFORNIA DEPARTMENT OF INSURANCE
1901 Harrison Street, 3d Floor
Oakland, CA 94612
AHBFilings@insurance.ca.gov
florinda.cristobal@insurance.ca.gov
camille.johnson@insurance.ca.gov

Attorneys for the CA Department of Insurance:

Nikki S. McKenna
Jennifer McCune
Daniel Wade
Duncan Montgomery
Lisbeth Landsman-Smith
Margaret Hosel
Elsa Carre
Cecilia Padua
Tim Oakes
CALIFORNIA DEPARTMENT OF INSURANCE
1901 Harrison Street, Sixth Floor
Oakland, CA 94612
Tel: (415) 538-4162
Fax: (510) 238-7829
nikki.mckenna@insurance.ca.gov
jennifer.mccune@insurance.ca.gov
daniel.wade@insurance.ca.gov
duncan.montgomery@insurance.ca.gov
lisbeth.landsman@insurance.ca.gov
margaret.hosel@insurance.ca.gov
elsa.carre@insurance.ca.gov
cecilia.padua@insurance.ca.gov
tim.oakes@insurnace.ca.gov

Attorneys for Intervenor Consumer Watchdog:

Harvey Rosenfield
Pamela Pressley
William Pletcher
Ryan Mellino
Benjamin Powell
Kaitlyn Gentile

CONSUMER WATCHDOG

6330 San Vicente Blvd., Suite 250
Los Angeles, CA 90048
Tel: (310) 392-0522
Fax: (310) 392-8874
harvey@consumerwatchdog.org
pam@consumerwatchdog.org
will@consumerwatchdog.org
ryan@consumerwatchdog.org
ben@consumerwatchdog.org
kaitlyn@consumerwatchdog.org

Christina Tusan
Adrian Barnes
TUSAN LAW, P.C.
680 E. Colorado Blvd. 180
Pasadena, CA 91101
(626) 418-8203
(626) 619-8253 (Fax)
ctusan@ctusanlaw.com
abarnes@ctusanlaw.com

Attorneys for Intervenor Merritt David Farren:

Merritt David Farren
26565 West Agoura Rd.
Suite 200
Calabasas, CA 91302
(818) 474-4610
merritt.farren@farrenLLP.com