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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.

Karl Fredric J. Seligman
Administrative Law Judge

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Sincerely,

/s/ Katie Wellington

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