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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

CONSUMER WATCHDOG, a non-profit organization, and CONSUMER FEDERATION OF CALIFORNIA EDUCATION FOUNDATION, a non-profit organization,

Petitioners/Plaintiffs,

v.

RICARDO LARA, in his official capacity as the Insurance Commissioner of the State of California; CALIFORNIA DEPARTMENT OF INSURANCE; and DOES 1–20,

Respondents/Defendants.

CASE NO. 25STCP02841

PETITIONER CONSUMER WATCHDOG'S OBJECTIONS AND RESPONSES TO RESPONDENT CALIFORNIA DEPARTMENT OF INSURANCE'S REQUESTS FOR ADMISSION, SET ONE

Dept No.: 834
Judge: Tiana J. Murillo
Action Filed: July 29, 2025
Trial Date: Not Set

PROPOUNDING PARTY: Respondent California Department of Insurance

RESPONDING PARTY: Petitioner Consumer Watchdog

SET NUMBER: One

PRELIMINARY STATEMENT

Requests 1 through 52 and 55 through 60 ask Petitioner to admit the dates and amounts of compensation decisions that Respondents themselves issued. Petitioner admits them. The decisions establish two facts. First, Respondents routinely decide Petitioner's requests for compensation late: where a response below states the number of days between the filing of the RFC and the decision, the decision issued after the 90-day deadline of California Code of Regulations, title 10, section 2662.6, subdivision (a). Second, before the Commissioner withdrew pending RFCs from the Administrative Hearing Bureau on December 17, 2024, Respondents compensated Petitioner for participating in rulemaking proceedings, not only in rate proceedings. (See Responses to Requests 1, 19.)

Respondent served 60 requests for admission, well beyond the 35 permitted by Code of Civil Procedure section 2033.030, subdivision (a). Petitioner does not concede that Respondent's declaration justifies that number, but it responds to every request rather than burden the Court with a motion. Petitioner reserves all objections to the admissibility of these responses at trial.

OBJECTIONS AND RESPONSES TO REQUESTS FOR ADMISSION

REQUEST FOR ADMISSION NO. 1.

Admit that on or about October 21, 2019, YOU were awarded $25,641.50 for YOUR RFC in connection with the Matter of the Rulemaking regarding Gender Non-discrimination in Automobile Insurance Ratemaking, File No. Reg-2018-00020.

RESPONSE TO REQUEST FOR ADMISSION NO. 1

Admitted. Petitioner further states that Respondents served this decision 263 days after Petitioner filed its RFC, and 173 days after the 90-day deadline of California Code of Regulations, title 10, section 2662.6, subdivision (a).

REQUEST FOR ADMISSION NO. 2.

Admit that on March 20, 2020, YOU were awarded $61,489.50 for YOUR RFC in connection with the Matter of the Class Plan Applications of California Automobile Insurance Company and Mercury Insurance, File No. PA-2017-00009.

RESPONSE TO REQUEST FOR ADMISSION NO. 2

Admitted. Petitioner further states that Respondents served this decision 280 days after Petitioner filed its RFC, and 190 days after the 90-day deadline of California Code of Regulations, title 10, section 2662.6, subdivision (a).

REQUEST FOR ADMISSION NO. 3.

Admit that on July 29, 2020, YOU were awarded $22,461.00 for YOUR RFC in connection with the Matter of the Rate Applications of Farmers Insurance Exchange, Mid-Century Insurance Company, and Truck Insurance Exchange, File No. PA-2019-00004.

RESPONSE TO REQUEST FOR ADMISSION NO. 3

Admitted, except that the decision was not served on Petitioner until July 30, 2020. Petitioner further states that Respondents served this decision 167 days after Petitioner filed its RFC, and 77 days after the 90-day deadline of California Code of Regulations, title 10, section 2662.6, subdivision (a).

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REQUEST FOR ADMISSION NO. 4.

Admit that on July 30, 2020, YOU were awarded $55,167.00 for YOUR RFC in connection with the Matter of the Rate Applications of Pacific Specialty Insurance Company, File No. PA-2019-00001.

RESPONSE TO REQUEST FOR ADMISSION NO. 4

Admitted, except that the decision was not served on Petitioner until July 31, 2020. Petitioner further states that Respondents served this decision 140 days after Petitioner filed its RFC, and 50 days after the 90-day deadline of California Code of Regulations, title 10, section 2662.6, subdivision (a).

REQUEST FOR ADMISSION NO. 5.

Admit that on January 15, 2021, YOU were awarded $256,990.40 for YOUR RFC in connection with the Matters of the Class Plan Application of State Farm Mutual Automobile Insurance Company and Rate Plan Application of State Farm General Insurance Company, File Nos. PA-2018-00004 and PA-2018-00005.

RESPONSE TO REQUEST FOR ADMISSION NO. 5

Admitted, except that Petitioner states it submitted separate RFCs for each application. Petitioner further states that Respondents served this decision 120 days after Petitioner filed its RFC, and 30 days after the 90-day deadline of California Code of Regulations, title 10, section 2662.6, subdivision (a).

REQUEST FOR ADMISSION NO. 6.

Admit that on March 18, 2021, YOU were awarded $14,083.50 for YOUR RFC in connection with the Matter of the Rate Application of Esurance Property and Casualty Insurance Company, File No. PA-2020-00001.

RESPONSE TO REQUEST FOR ADMISSION NO. 6

Admitted. Petitioner further states that Respondents served this decision 269 days after Petitioner filed its RFC, and 178 days after the 90-day deadline of California Code of Regulations, title 10, section 2662.6, subdivision (a).[1]

[1] 90 days from the date the RFC was filed was September 20, 2020, a Sunday.

REQUEST FOR ADMISSION NO. 7.

Admit that on March 18, 2021, YOU were awarded $14,850.50 for YOUR RFC in connection with the Matter of the Rate Application of NORCAL Mutual Insurance Company, File No. PA-2020-00002.

RESPONSE TO REQUEST FOR ADMISSION NO. 7

Admitted. Petitioner further states that Respondents served this decision 210 days after Petitioner filed its RFC, and 120 days after the 90-day deadline of California Code of Regulations, title 10, section 2662.6, subdivision (a).

REQUEST FOR ADMISSION NO. 8.

Admit that on March 18, 2021, YOU were awarded $23,223.00 for YOUR RFC in connection with the Matter of the Rate Plan Application of State Farm General Insurance Company, File No. PA-2019-00006.

RESPONSE TO REQUEST FOR ADMISSION NO. 8

Admitted.

REQUEST FOR ADMISSION NO. 9.

Admit that on March 25, 2021, YOU were awarded $60,069.00 for YOUR RFC in connection with the Matter of the Rate Application of Pacific Specialty Insurance Company, File No. PA-2019-00003.

RESPONSE TO REQUEST FOR ADMISSION NO. 9

Admitted. Petitioner further states that Respondents served this decision 289 days after Petitioner filed its RFC, and 198 days after the 90-day deadline of California Code of Regulations, title 10, section 2662.6, subdivision (a).[2]

REQUEST FOR ADMISSION NO. 10.

Admit that on April 1, 2021, YOU were awarded $1,209,916.58 for YOUR RFC in connection with the Matter involving the Non-compliance Investigatory Proceeding of Farmers Insurance Exchange and Mid-Century Insurance Company, File No. NC-2017-00003.

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[2] 90 days after the RFC was filed was September 7, 2020, Labor Day.

RESPONSE TO REQUEST FOR ADMISSION NO. 10

Admitted, except that the decision was not served on Petitioner until April 5, 2021. Petitioner further states that Respondents served this decision 213 days after Petitioner filed its RFC, and 123 days after the 90-day deadline of California Code of Regulations, title 10, section 2662.6, subdivision (a).

REQUEST FOR ADMISSION NO. 11.

Admit that on May 13, 2021, YOU were awarded $23,083.00 for YOUR RFC in connection with the Matter of the Rate Application of American Casualty Company of Reading, Pennsylvania, File No. PA-2020-00007.

RESPONSE TO REQUEST FOR ADMISSION NO. 11

Admitted. Petitioner further states that an initial Decision Awarding Compensation was served on Apr. 16, 2021. Petitioner further states that Respondents served their initial decision 193 days after Petitioner filed its RFC, and 102 days after the 90-day deadline of California Code of Regulations, title 10, section 2662.6, subdivision (a). Respondents served their Amended Decision Awarding Compensation 220 days after Petitioner filed its RFC, and 129 days after the 90-day deadline of California Code of Regulations, title 10, section 2662.6, subdivision (a).[3]

REQUEST FOR ADMISSION NO. 12.

Admit that on May 13, 2021, YOU were awarded $54,002.00 for YOUR RFC in connection with the Matter of the Rate Applications of Farmers Insurance Exchange, Fire Insurance Exchange, and Mid-Century Insurance Company, File No. PA-2019-00008.

RESPONSE TO REQUEST FOR ADMISSION NO. 12

Admitted. Petitioner further states that Respondents served this decision 191 days after Petitioner filed its RFC, and 101 days after the 90-day deadline of California Code of Regulations, title 10, section 2662.6, subdivision (a).

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[3] 90 days after the RFC was filed was January 3, 2021, a Sunday.

REQUEST FOR ADMISSION NO. 13.

Admit that on August 25, 2021, YOU were awarded $33,227.50 for YOUR RFC in connection with the Matter of the Rate Application of Pacific Specialty Insurance Company, File No. PA-2020-00010.

RESPONSE TO REQUEST FOR ADMISSION NO. 13

Admitted. Petitioner further states that Respondents served this decision 173 days after Petitioner filed its RFC, and 83 days after the 90-day deadline of California Code of Regulations, title 10, section 2662.6, subdivision (a).

REQUEST FOR ADMISSION NO. 14.

Admit that on October 6, 2021, YOU were awarded $55,129.50 for YOUR RFC in connection with the Matter of the Rate Applications of Farmers Insurance Exchange, Fire Insurance Exchange, and Mid-Century Insurance Company, File No. PA-2020-00006.

RESPONSE TO REQUEST FOR ADMISSION NO. 14

Admitted. Petitioner further states that Respondents served this decision 118 days after Petitioner filed its RFC, and 28 days after the 90-day deadline of California Code of Regulations, title 10, section 2662.6, subdivision (a).

REQUEST FOR ADMISSION NO. 15.

Admit that on February 16, 2022, YOU were awarded $42,428.50 for YOUR RFC in connection with the Matter of the New Program Applications of Farmers Insurance Exchange and Fire Insurance Exchange, File No. PA-2020-00004.

RESPONSE TO REQUEST FOR ADMISSION NO. 15

Admitted. Petitioner further states that Respondents served this decision 173 days after Petitioner filed its RFC, and 79 days after the 90-day deadline of California Code of Regulations, title 10, section 2662.6, subdivision (a).[4]

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[4] 90 days after the RFC was filed was November 25, 2021, Thanksgiving Day.

REQUEST FOR ADMISSION NO. 16.

Admit that on February 14, 2022, YOU were awarded $97,048.50 for YOUR RFC in connection with the Matter of the Rate Application of Homesite Insurance Company, File No. PA-2020-00003.

RESPONSE TO REQUEST FOR ADMISSION NO. 16

Admitted, except that the decision was served on Petitioner on February 15, 2022. Petitioner further states that Respondents served this decision 165 days after Petitioner filed its RFC, and 75 days after the 90-day deadline of California Code of Regulations, title 10, section 2662.6, subdivision (a).

REQUEST FOR ADMISSION NO. 17.

Admit that on June 29, 2022, YOU were awarded $65,615.00 for YOUR RFC in connection with the Matter of the Rate Application of Farmers Insurance Exchange, Fire Insurance Exchange, and Mid-Century Insurance Company, File No. PA-2021-00007.

RESPONSE TO REQUEST FOR ADMISSION NO. 17

Admitted.

REQUEST FOR ADMISSION NO. 18.

Admit that on August 16, 2022, YOU were awarded $136,662.50 for YOUR RFC in connection with the Matter of the Rate Application of CSAA Insurance Exchange, File No. PA-2021-00002.

RESPONSE TO REQUEST FOR ADMISSION NO. 18

Admitted. Petitioner further states that Respondents served this decision 312 days after Petitioner filed its RFC, and 222 days after the 90-day deadline of California Code of Regulations, title 10, section 2662.6, subdivision (a).

REQUEST FOR ADMISSION NO. 19.

Admit that on March 8, 2023, YOU were awarded $372,737.88 for YOUR RFC in connection with the Matter of the Rulemaking Hearing re: Mitigation in Rating Plans and Wildfire Risk Models, File Nos. REG-2020-00015 and REG-2020-00016.

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RESPONSE TO REQUEST FOR ADMISSION NO. 19

Admitted, except that the decision was not served on Petitioner until March 9, 2023. Petitioner further states that Respondents served this decision 122 days after Petitioner filed its RFC, and 31 days after the 90-day deadline of California Code of Regulations, title 10, section 2662.6, subdivision (a).[5]

REQUEST FOR ADMISSION NO. 20.

Admit that on June 21, 2023, Administrative Law Judge Alicia Clement issued an order denying YOUR RFC in connection with the Matter of the Rate Application of Interinsurance Exchange of the Automobile Club, File No. PA-2022-00005, because she determined that YOU "failed to make a substantial contribution" to the rate application proceedings.

RESPONSE TO REQUEST FOR ADMISSION NO. 20

Petitioner admits that on June 21, 2023, Administrative Law Judge Alicia Clement issued an order denying Petitioner's RFC in this matter, which was served on Petitioner on June 22, 2023, and that the order states that Petitioner "failed to make a substantial contribution." Petitioner denies that the order applied a correct interpretation of the substantial contribution standard. Petitioner further states that Respondents served this decision 94 days after Petitioner filed its RFC, and 3 days after the 90-day deadline of California Code of Regulations, title 10, section 2662.6, subdivision (a).[6] Except as expressly admitted, denied.

REQUEST FOR ADMISSION NO. 21.

Admit that YOU did not file a petition for writ of mandate under Code of Civil Procedure sections 1060, 1085, and 1094.5, for the June 21, 2023, denial of YOUR RFC in connection with the Matter of the Rate Application of Interinsurance Exchange of the Automobile Club, File No. PA-2022-00005.

RESPONSE TO REQUEST FOR ADMISSION NO. 21

Admitted.

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[5] 90 days after the RFC was filed was February 5, 2023, a Sunday.
[6] 90 days after the RFC was filed was June 18, 2023, a Sunday.

REQUEST FOR ADMISSION NO. 22.

Admit that on July 12, 2023, YOU were awarded $82,814.50 for YOUR RFC in connection with the Matter of the Rate Application of Farmers Exchange, Fore Insurance, and Mid-Century Insurance Company, File No. PA-2022-00007.

RESPONSE TO REQUEST FOR ADMISSION NO. 22

Admitted. Petitioner further states that Respondents served this decision 92 days after Petitioner filed its RFC, and 2 days after the 90-day deadline of California Code of Regulations, title 10, section 2662.6, subdivision (a).

REQUEST FOR ADMISSION NO. 23.

Admit that on November 8, 2023, Administrative Law Judge Alicia Clement issued an order denying YOUR RFC in connection with the Matter of the Rate Application of State Farm Mutual Automobile Insurance Company, File No. PA-2022-00010, because she determined that YOU "failed to make a substantial contribution" to the rate application proceedings.

RESPONSE TO REQUEST FOR ADMISSION NO. 23

Admitted. Petitioner further states that Respondents served this decision 208 days after Petitioner filed its RFC, and 118 days after the 90-day deadline of California Code of Regulations, title 10, section 2662.6, subdivision (a).

REQUEST FOR ADMISSION NO. 24.

Admit that YOU did not file a petition for writ of mandate under Code of Civil Procedure sections 1060, 1085, and 1094.5, for the November 8, 2023, denial of YOUR RFC in connection with the Matter of the Rate Application of State Farm Mutual Automobile Insurance Company, File No. PA-2022-00010.

RESPONSE TO REQUEST FOR ADMISSION NO. 24

Admitted.

REQUEST FOR ADMISSION NO. 25.

Admit that on November 8, 2023, YOU were awarded $77,693.50 for YOUR RFC in connection with the Matter of the Rate Application of CSAA Insurance Exchange, File No. PA-2023-00004.

RESPONSE TO REQUEST FOR ADMISSION NO. 25

Admitted.

REQUEST FOR ADMISSION NO. 26.

Admit that on October 18, 2024, YOU were awarded $19,508.50 for YOUR RFC in connection with the Matter of the Rate Applications of Farmers Insurance Exchange, Mid-Century Insurance Company, and Truck Insurance Exchange, File No. PA-2023-00022.

RESPONSE TO REQUEST FOR ADMISSION NO. 26

Admitted. Petitioner further states that Respondents served this decision 252 days after Petitioner filed its RFC, and 162 days after the 90-day deadline of California Code of Regulations, title 10, section 2662.6, subdivision (a).

REQUEST FOR ADMISSION NO. 27.

Admit that on December 6, 2024, YOU were awarded $130,271.00 for YOUR RFC in connection with the Matter of the Rate Application of Pacific Specialty Insurance Company, File No. PA-2020-00009.

RESPONSE TO REQUEST FOR ADMISSION NO. 27

Admitted. Petitioner further states that the Chief Administrative Law Judge first awarded compensation in this matter on October 18, 2024. The Commissioner then granted the Rate Enforcement Bureau's request for reconsideration, and the December 6, 2024 decision struck the Chief Administrative Law Judge's findings concerning the Department's compliance with the Insurance Code and its implementing regulations. Respondents served this decision 324 days after Petitioner filed its RFC, and 234 days after the 90-day deadline of California Code of Regulations, title 10, section 2662.6, subdivision (a).

REQUEST FOR ADMISSION NO. 28.

Admit that on December 6, 2024, YOU were awarded $175,895.15 for YOUR RFC in connection with the Matter of the Rate Application of State Farm General Insurance Company, File No. PA-2023-00007.

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RESPONSE TO REQUEST FOR ADMISSION NO. 28

Admitted. Petitioner further states that the Chief Administrative Law Judge first awarded compensation in this matter on October 18, 2024. The Commissioner then granted the Rate Enforcement Bureau's request for reconsideration, and the December 6, 2024 decision struck the Chief Administrative Law Judge's findings concerning the Department's compliance with the Insurance Code and its implementing regulations. Respondents served this decision 312 days after Petitioner filed its RFC, and 221 days after the 90-day deadline of California Code of Regulations, title 10, section 2662.6, subdivision (a).[7]

REQUEST FOR ADMISSION NO. 29.

Admit that on December 6, 2024, YOU were awarded $79,681.50 for YOUR RFC in connection with the Matter of the Rate Applications of Garrison Property and Casualty Insurance Company and USAA Casualty Insurance Company, File No. PA-2023-00004.

RESPONSE TO REQUEST FOR ADMISSION NO. 29

Admitted, except that the application was given File No. PA-2021-00004; the December 6, 2024 decision appears to have miscited the file number. Petitioner further states that the Chief Administrative Law Judge first awarded compensation in this matter on October 18, 2024. The Commissioner then granted the Rate Enforcement Bureau's request for reconsideration, and the December 6, 2024 decision struck the Chief Administrative Law Judge's findings concerning the Department's compliance with the Insurance Code and its implementing regulations. Respondents served this decision 581 days after Petitioner filed its RFC, and 491 days after the 90-day deadline of California Code of Regulations, title 10, section 2662.6, subdivision (a).

REQUEST FOR ADMISSION NO. 30.

Admit that on December 6, 2024, YOU were awarded $62,143.50 for YOUR RFC in connection with the Matter of the Rate Application of Allstate Northbrook Indemnity Company, File No. PA-2023-00014.

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[7] 90 days after the RFC was filed was April 28, 2024, a Sunday.

RESPONSE TO REQUEST FOR ADMISSION NO. 30

Admitted. Petitioner further states that the Chief Administrative Law Judge first awarded compensation in this matter on October 18, 2024. The Commissioner then granted the Rate Enforcement Bureau's request for reconsideration, and the December 6, 2024 decision struck the Chief Administrative Law Judge's findings concerning the Department's compliance with the Insurance Code and its implementing regulations. Respondents served this decision 331 days after Petitioner filed its RFC, and 241 days after the 90-day deadline of California Code of Regulations, title 10, section 2662.6, subdivision (a).

REQUEST FOR ADMISSION NO. 31.

Admit that on December 6, 2024, YOU were awarded $74,679.50 for YOUR RFC in connection with the Matter of the Rate Application of State Farm General Insurance Company, File No. PA-2023-00006.

RESPONSE TO REQUEST FOR ADMISSION NO. 31

Admitted. Petitioner further states that the Chief Administrative Law Judge first awarded compensation in this matter on October 18, 2024. The Commissioner then granted the Rate Enforcement Bureau's request for reconsideration, and the December 6, 2024 decision struck the Chief Administrative Law Judge's findings concerning the Department's compliance with the Insurance Code and its implementing regulations. Respondents served this decision 357 days after Petitioner filed its RFC, and 267 days after the 90-day deadline of California Code of Regulations, title 10, section 2662.6, subdivision (a).

REQUEST FOR ADMISSION NO. 32.

Admit that on December 6, 2024, YOU were awarded $101,351.00 for YOUR RFC in connection with the Matter of the Rate Application of State Farm General Insurance Company, File No. PA-2023-00012.

RESPONSE TO REQUEST FOR ADMISSION NO. 32

Admitted. Petitioner further states that the Chief Administrative Law Judge first awarded compensation in this matter on October 18, 2024. The Commissioner then granted the Rate Enforcement Bureau's request for reconsideration, and the December 6, 2024 decision struck the Chief

Administrative Law Judge's findings concerning the Department's compliance with the Insurance Code and its implementing regulations. Respondents served this decision 308 days after Petitioner filed its RFC, and 218 days after the 90-day deadline of California Code of Regulations, title 10, section 2662.6, subdivision (a).

REQUEST FOR ADMISSION NO. 33.

Admit that on January 29, 2025, YOU were awarded $28,440.00 for YOUR RFC in connection with the Matter of the Rate Application of Liberty Insurance Corporation, File No. PA-2023-00016.

RESPONSE TO REQUEST FOR ADMISSION NO. 33

Admitted. Petitioner further states that Respondents issued this decision after the Commissioner issued his Delegation Order withdrawing review of RFCs from the Administrative Hearing Bureau on November 21, 2024.

REQUEST FOR ADMISSION NO. 34.

Admit that on February 14, 2025, YOU were awarded $37,002.30 for YOUR RFC in connection with the Matter of the Rate Application of United Services Automobile Association, File No. PA-2023-00023.

RESPONSE TO REQUEST FOR ADMISSION NO. 34

Admitted. Petitioner further states that Respondents issued this decision after the Commissioner issued his Delegation Order withdrawing review of RFCs from the Administrative Hearing Bureau on November 21, 2024. Respondents served this decision 105 days after Petitioner filed its RFC, and 15 days after the 90-day deadline of California Code of Regulations, title 10, section 2662.6, subdivision (a).

REQUEST FOR ADMISSION NO. 35.

Admit that on May 16, 2025, YOU were awarded $37,008.00 for YOUR RFC in connection with the Matter of the Rate Application of 21st Century Insurance Company and 21st Century Casualty Company, File No. PA-2024-00006.

RESPONSE TO REQUEST FOR ADMISSION NO. 35

Admitted. Petitioner further states that Respondents issued this decision after the Commissioner issued his Delegation Order withdrawing review of RFCs from the Administrative Hearing Bureau on

November 21, 2024. Respondents served this decision 204 days after Petitioner filed its RFC, and 114 days after the 90-day deadline of California Code of Regulations, title 10, section 2662.6, subdivision (a).

REQUEST FOR ADMISSION NO. 36.

Admit that on May 16, 2025, YOU were awarded $54,019.00 for YOUR RFC in connection with the Matter of the Rate Application of State Farm Automobile Insurance Company, File No. PA-2024-00010.

RESPONSE TO REQUEST FOR ADMISSION NO. 36

Admitted. Petitioner further states that Respondents issued this decision after the Commissioner issued his Delegation Order withdrawing review of RFCs from the Administrative Hearing Bureau on November 21, 2024. Respondents served this decision 126 days after Petitioner filed its RFC, and 36 days after the 90-day deadline of California Code of Regulations, title 10, section 2662.6, subdivision (a).

REQUEST FOR ADMISSION NO. 37.

Admit that on May 23, 2025, YOU were awarded $46,271.50 for YOUR RFC in connection with the Matter of the Rate Application of United Financial Casualty Company, File No. PA-2024-00003.

RESPONSE TO REQUEST FOR ADMISSION NO. 37

Admitted. Petitioner further states that Respondents issued this decision after the Commissioner withdrew pending RFCs from the Administrative Hearing Bureau on December 17, 2024. Respondents served this decision 128 days after Petitioner filed its RFC, and 38 days after the 90-day deadline of California Code of Regulations, title 10, section 2662.6, subdivision (a).

REQUEST FOR ADMISSION NO. 38.

Admit that on May 23, 2025, YOU were awarded $44,035.00 for YOUR RFC in connection with the Matter of the Rate Applications of Farmers Insurance Exchange, Fire Insurance Exchange, and Mid-Century Insurance Company, File No. PA-2023-00015.

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RESPONSE TO REQUEST FOR ADMISSION NO. 38

Admitted. Petitioner further states that Respondents issued this decision after the Commissioner withdrew pending RFCs from the Administrative Hearing Bureau on December 17, 2024. Respondents served this decision 120 days after Petitioner filed its RFC, and 30 days after the 90-day deadline of California Code of Regulations, title 10, section 2662.6, subdivision (a).

REQUEST FOR ADMISSION NO. 39.

Admit that on May 23, 2025, YOU were awarded $90,028.50 for YOUR RFC in connection with the Matter of the Rate Application of Medical Insurance Exchange of California, File No. PA-2021-00003.

RESPONSE TO REQUEST FOR ADMISSION NO. 39

Admitted. Petitioner further states that Respondents issued this decision after the Commissioner withdrew pending RFCs from the Administrative Hearing Bureau on December 17, 2024. Respondents served this decision 806 days after Petitioner filed its RFC, and 716 days after the 90-day deadline of California Code of Regulations, title 10, section 2662.6, subdivision (a).

REQUEST FOR ADMISSION NO. 40.

Admit that on May 23, 2025, YOU were awarded $135,713.00 for YOUR RFC in connection with the Matter of the Rate Application of Allstate Insurance Company, File No. PA-2021-00005.

RESPONSE TO REQUEST FOR ADMISSION NO. 40

Admitted. Petitioner further states that Respondents issued this decision after the Commissioner withdrew pending RFCs from the Administrative Hearing Bureau on December 17, 2024. Respondents served this decision 681 days after Petitioner filed its RFC, and 591 days after the 90-day deadline of California Code of Regulations, title 10, section 2662.6, subdivision (a).

REQUEST FOR ADMISSION NO. 41.

Admit that on May 23, 2025, YOU were awarded $50,072.00 for YOUR RFC in connection with the Matter of the Rate Applications of First National Insurance Company of America, Safeco Insurance Company of America, and Safeco Insurance Company of Illinois, File No. PA-2022-00002.

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RESPONSE TO REQUEST FOR ADMISSION NO. 41

Admitted. Petitioner further states that Respondents issued this decision after the Commissioner withdrew pending RFCs from the Administrative Hearing Bureau on December 17, 2024. Respondents served this decision 723 days after Petitioner filed its RFC, and 633 days after the 90-day deadline of California Code of Regulations, title 10, section 2662.6, subdivision (a).

REQUEST FOR ADMISSION NO. 42.

Admit that on May 23, 2025, YOU were awarded $40,172.00 for YOUR RFC in connection with the Matter of the Rate Application of Mercury Insurance Company, File No. PA-2022-00004.

RESPONSE TO REQUEST FOR ADMISSION NO. 42

Admitted. Petitioner further states that Respondents issued this decision after the Commissioner withdrew pending RFCs from the Administrative Hearing Bureau on December 17, 2024. Respondents served this decision 813 days after Petitioner filed its RFC, and 723 days after the 90-day deadline of California Code of Regulations, title 10, section 2662.6, subdivision (a).

REQUEST FOR ADMISSION NO. 43.

Admit that on May 23, 2025, YOU were awarded $63,378.50 for YOUR RFC in connection with the Matter of the Rate Applications of GEICO Indemnity Company, GEICO Casualty Company, GEICO General Insurance Company, and Government Employees Insurance Company, File No. PA-2022-00006.

RESPONSE TO REQUEST FOR ADMISSION NO. 43

Admitted. Petitioner further states that Respondents issued this decision after the Commissioner withdrew pending RFCs from the Administrative Hearing Bureau on December 17, 2024. Respondents served this decision 837 days after Petitioner filed its RFC, 771 days after Petitioner submitted supplemental RFC exhibits, and 681 days after the 90-day deadline of California Code of Regulations, title 10, section 2662.6, subdivision (a), as calculated from the date the supplemental exhibits were submitted.

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REQUEST FOR ADMISSION NO. 44.

Admit that on May 23, 2025, YOU were awarded $13,382.00 for YOUR RFC in connection with the Matter of the Rate Application of California Automobile Insurance Company, File No. PA-2022-00008.

RESPONSE TO REQUEST FOR ADMISSION NO. 44

Admitted. Petitioner further states that Respondents issued this decision after the Commissioner withdrew pending RFCs from the Administrative Hearing Bureau on December 17, 2024. Respondents served this decision 813 days after Petitioner filed its RFC, and 723 days after the 90-day deadline of California Code of Regulations, title 10, section 2662.6, subdivision (a).

REQUEST FOR ADMISSION NO. 45.

Admit that on May 23, 2025, YOU were awarded $58,120.00 for YOUR RFC in connection with the Matter of the Rate Applications of Infinity Insurance Company, File No. PA-2023-00003.

RESPONSE TO REQUEST FOR ADMISSION NO. 45

Admitted. Petitioner further states that Respondents issued this decision after the Commissioner withdrew pending RFCs from the Administrative Hearing Bureau on December 17, 2024. Respondents served this decision 674 days after Petitioner filed its RFC, and 584 days after the 90-day deadline of California Code of Regulations, title 10, section 2662.6, subdivision (a).

REQUEST FOR ADMISSION NO. 46.

Admit that on May 23, 2025, YOU were awarded $110,518.00 for YOUR RFC in connection with the Matter of the Rate Applications of Farmers Insurance Exchange, Mid-Century Insurance Company, and Truck Insurance Exchange, File No. PA-2023-00008.

RESPONSE TO REQUEST FOR ADMISSION NO. 46

Admitted. Petitioner further states that Respondents issued this decision after the Commissioner withdrew pending RFCs from the Administrative Hearing Bureau on December 17, 2024. Respondents served this decision 618 days after Petitioner filed its RFC, and 528 days after the 90-day deadline of California Code of Regulations, title 10, section 2662.6, subdivision (a).

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REQUEST FOR ADMISSION NO. 47.

Admit that on May 23, 2025, YOU were awarded $112,621.00 for YOUR RFC in connection with the Matter of the Rate Applications of Farmers Insurance Exchange, Fire Insurance Exchange, and Mid-Century Insurance Company, File No. PA-2023-00009.

RESPONSE TO REQUEST FOR ADMISSION NO. 47

Admitted. Petitioner further states that Respondents issued this decision after the Commissioner withdrew pending RFCs from the Administrative Hearing Bureau on December 17, 2024. Respondents served this decision 618 days after Petitioner filed its RFC, and 528 days after the 90-day deadline of California Code of Regulations, title 10, section 2662.6, subdivision (a).

REQUEST FOR ADMISSION NO. 48.

Admit that on May 23, 2025, YOU were awarded $119,439.00 for YOUR RFC in connection with the Matter of the Rate Application of Allstate Insurance Company, File No. PA-2023-00011.

RESPONSE TO REQUEST FOR ADMISSION NO. 48

Admitted. Petitioner further states that Respondents issued this decision after the Commissioner withdrew pending RFCs from the Administrative Hearing Bureau on December 17, 2024. Respondents served this decision 259 days after Petitioner filed its RFC, and 169 days after the 90-day deadline of California Code of Regulations, title 10, section 2662.6, subdivision (a).

REQUEST FOR ADMISSION NO. 49.

Admit that on May 23, 2025, YOU were awarded $94,310.00 for YOUR RFC in connection with the Matter of the Rate Applications of GEICO Indemnity Company, GEICO Casualty Company, GEICO General Insurance Company, and Government Employees Insurance Company, File No. PA-2023-00013.

RESPONSE TO REQUEST FOR ADMISSION NO. 49

Admitted. Petitioner further states that Respondents issued this decision after the Commissioner withdrew pending RFCs from the Administrative Hearing Bureau on December 17, 2024. Respondents served this decision 462 days after Petitioner filed its RFC, and 372 days after the 90-day deadline of California Code of Regulations, title 10, section 2662.6, subdivision (a).

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REQUEST FOR ADMISSION NO. 50.

Admit that on May 23, 2025, YOU were awarded $72,514.00 for YOUR RFC in connection with the Matter of the Rate Application of Standard Fire Insurance Company, File No. PA-2023-00017.

RESPONSE TO REQUEST FOR ADMISSION NO. 50

Admitted. Petitioner further states that Respondents issued this decision after the Commissioner withdrew pending RFCs from the Administrative Hearing Bureau on December 17, 2024. Respondents served this decision 357 days after Petitioner filed its RFC, and 267 days after the 90-day deadline of California Code of Regulations, title 10, section 2662.6, subdivision (a).

REQUEST FOR ADMISSION NO. 51.

Admit that on May 23, 2025, YOU were awarded $79,779.50 for YOUR RFC in connection with the Matter of the Rate Application of CSAA Insurance Exchange, File No. PA-2023-00021.

RESPONSE TO REQUEST FOR ADMISSION NO. 51

Admitted. Petitioner further states that Respondents issued this decision after the Commissioner withdrew pending RFCs from the Administrative Hearing Bureau on December 17, 2024. Respondents served this decision 416 days after Petitioner filed its RFC, and 326 days after the 90-day deadline of California Code of Regulations, title 10, section 2662.6, subdivision (a).

REQUEST FOR ADMISSION NO. 52.

Admit that on May 23, 2025, YOU were awarded $49,676.50 for YOUR RFC in connection with the Matter of the Rate, Rule, and Form Application of Liberty Mutual Fire Insurance Company, File No. PA-2024-00004.

RESPONSE TO REQUEST FOR ADMISSION NO. 52

Admitted. Petitioner further states that Respondents issued this decision after the Commissioner withdrew pending RFCs from the Administrative Hearing Bureau on December 17, 2024. Respondents served this decision 266 days after Petitioner filed its RFC, and 172 days after the 90-day deadline of California Code of Regulations, title 10, section 2662.6, subdivision (a).[8]

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[8] 90 days after the RFC was filed was November 28, 2024, Thanksgiving Day.

REQUEST FOR ADMISSION NO. 53.

Admit that on May 30, 2025, a decision was issued denying YOUR RFC in connection with the Matter of Complete Property and Casualty Rate Applications Rulemaking, File Nos. IP-2024-00012 and REG-2019-00025, because it was determined that YOU failed to make a "substantial contribution".

RESPONSE TO REQUEST FOR ADMISSION NO. 53

Petitioner admits that on May 30, 2025, Respondents issued a decision, signed by Deputy Commissioner and Special Counsel Lucy Wang, denying Petitioner's RFC in this matter, and that the decision states that Petitioner failed to make a "substantial contribution." Petitioner further states that Respondents served the decision 184 days after Petitioner filed its RFC, and 94 days after the 90-day deadline of California Code of Regulations, title 10, section 2662.6, subdivision (a). Petitioner denies that the decision applied a correct interpretation of the substantial contribution standard, and denies that the stated ground was the actual basis for the denial. Petitioner further states that Respondents issued this decision after the Commissioner issued his Delegation Order withdrawing review of RFCs from the Administrative Hearing Bureau on November 21, 2024. Except as expressly admitted, denied.

REQUEST FOR ADMISSION NO. 54.

Admit that on June 13, 2025, a decision was issued denying YOUR RFC in connection with the Matter of Catastrophe Modeling and Ratemaking Rulemaking, File Nos. IP-2024-00018 and REG-2023-00010, because it was determined that YOU failed to make a "substantial contribution".

RESPONSE TO REQUEST FOR ADMISSION NO. 54

Petitioner admits that on June 13, 2025, Respondents issued a decision, signed by Deputy Commissioner and Special Counsel Lucy Wang, denying Petitioner's RFC in this matter, and that the decision states that Petitioner failed to make a "substantial contribution." Petitioner further states that the decision itself explains: "What distinguishes Watchdog is not the substance of its contribution, but its sustained opposition." Respondents served the decision 105 days after Petitioner filed its RFC, and 15 days after the 90-day deadline of California Code of Regulations, title 10, section 2662.6, subdivision (a). Petitioner denies that the decision applied a correct interpretation of the substantial contribution standard, and denies that the stated ground was the actual basis for the denial. Petitioner further states that Respondents issued this decision after the Commissioner issued his Delegation Order

withdrawing review of RFCs from the Administrative Hearing Bureau on November 21, 2024. Except as expressly admitted, denied.

REQUEST FOR ADMISSION NO. 55.

Admit that on July 3, 2025, YOU were awarded $29,572.50 for YOUR RFC in connection with the Matter of the Rate Application of General Insurance Company of America, File No. PA-2024-00014.

RESPONSE TO REQUEST FOR ADMISSION NO. 55

Admitted. Petitioner further states that Respondents issued this decision after the Commissioner issued his Delegation Order withdrawing review of RFCs from the Administrative Hearing Bureau on November 21, 2024.

REQUEST FOR ADMISSION NO. 56.

Admit that on July 30, 2025, YOU were awarded $61,208.50 for YOUR RFC in connection with the Matter of the Rate Applications of United Services Automobile Association, Garrison Property and Casualty Insurance Company, and USAA Casualty Insurance Company, File Nos. PA-2024-00007, PA-2024-00008, and PA-2024-00009.

RESPONSE TO REQUEST FOR ADMISSION NO. 56

Admitted. Petitioner further states that Respondents issued this decision after the Commissioner issued his Delegation Order withdrawing review of RFCs from the Administrative Hearing Bureau on November 21, 2024.

REQUEST FOR ADMISSION NO. 57.

Admit that on December 24, 2025, YOU were awarded $40,154.00 for YOUR RFC in connection with the Matter of the Rate Applications of CSAA Insurance Exchange, File No. PA-2024-00001.

RESPONSE TO REQUEST FOR ADMISSION NO. 57

Admitted. Petitioner further states that Respondents issued this decision after the Commissioner issued his Delegation Order withdrawing review of RFCs from the Administrative Hearing Bureau on November 21, 2024. Respondents served this decision 166 days after Petitioner filed its RFC, and 76

days after the 90-day deadline of California Code of Regulations, title 10, section 2662.6, subdivision (a).

REQUEST FOR ADMISSION NO. 58.

Admit that on January 9, 2026, YOU were awarded $25,555.00 for YOUR RFC in connection with the Matter of the Rate Application of Stillwater Insurance Company, File No. IP-2025-00002 (formerly No. PA-2025-00003).

RESPONSE TO REQUEST FOR ADMISSION NO. 58

Admitted. Petitioner further states that Respondents issued this decision after the Commissioner issued his Delegation Order withdrawing review of RFCs from the Administrative Hearing Bureau on November 21, 2024.

REQUEST FOR ADMISSION NO. 59.

Admit that on July 22, 2026, YOU were awarded $46,485.50 for YOUR RFC in connection with the Matter of the Rate Application of California Casualty Indemnity Exchange, File No. IP-2025-00014 (formerly No. PA-2025-00012).

RESPONSE TO REQUEST FOR ADMISSION NO. 59

Admitted. Petitioner further states that Respondents issued this decision after the Commissioner issued his Delegation Order withdrawing review of RFCs from the Administrative Hearing Bureau on November 21, 2024. Respondents served this decision 125 days after Petitioner filed its RFC, and 35 days after the 90-day deadline of California Code of Regulations, title 10, section 2662.6, subdivision (a).

REQUEST FOR ADMISSION NO. 60.

Admit that on July 24, 2026, YOU were awarded $222,644.60 for YOUR RFC in connection with the Matters of the Rate Application of California Automobile Insurance Company and the PRID Procedure of Verisk, Rate Application No. 25-1789 and File No. PRID-2025-00001.

RESPONSE TO REQUEST FOR ADMISSION NO. 60

Admitted. Petitioner further states that Respondents issued this decision after the Commissioner issued his Delegation Order withdrawing review of RFCs from the Administrative Hearing Bureau on November 21, 2024. Respondents served this decision 175 days after Petitioner filed its RFC, and 85

days after the 90-day deadline of California Code of Regulations, title 10, section 2662.6, subdivision (a).

DATE: November 6, 2026

CONSUMER WATCHDOG

By: Ryan Mellino

WILLIAM PLETCHER
RYAN MELLINO

Attorneys for Petitioner/Plaintiff

VERIFICATION

I am the Executive Director of Petitioner Consumer Watchdog. I am authorized to make this verification on behalf of Petitioner Consumer Watchdog. I have reviewed PETITIONER'S OBJECTIONS AND RESPONSES TO RESPONDENT'S REQUESTS FOR ADMISSION, SET ONE. To the best of my knowledge and belief, the responses in the foregoing document are true and correct.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on November 6, 2026 at Los Angeles, California.

Carmen Balber
Executive Director
Consumer Watchdog

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 November 6, 2026, I caused service of true and correct copies of the document entitled

PETITIONER CONSUMER WATCHDOG'S OBJECTIONS AND RESPONSES TO RESPONDENT CALIFORNIA DEPARTMENT OF INSURANCE'S REQUESTS FOR ADMISSION, SET ONE

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 November 6, 2026 at Los Angeles, California.

Mary Kozanian

Mary Kozanian

Service List

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Attorneys for Respondents/Defendants Ricardo Lara and the California Department of Insurance

☐ FAX
☐ U.S. MAIL
☐ OVERNIGHT MAIL
☐ HAND DELIVERED
☒ EMAIL