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U.S. DISTRICT COURT
N.D. OF ALABAMA

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION

MICKEY PARKER, et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	**Case No. 2:25-cv-00281-NAD**
	)	
STATE FARM FIRE & CASUALTY COMPANY,	)	
	)	
Defendant.	)	

PLAINTIFFS' NOTICE OF ZOOM DEPOSITION OF DEFENDANT STATE FARM FIRE & CASUALTY COMPANY

To: Katie T. Powell
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BUTLER SNOW LLP
1819 5th Avenue North
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Deponent: State Farm Fire & Casualty Company

Date: May 20, 2026

Time: 9:00 a.m. CDT

Location: Zoom

PLEASE TAKE NOTICE that at the time, date and location indicated above, the Plaintiffs will take the Zoom Video deposition of the Defendant pursuant to Fed. R.Civ.P. 30(b)(6). Said deposition shall be taken by stenographic means before a Notary Public or other officer authorized by law to administer oaths. The deposition will be taken for purposes of discovery, for use as evidence in the trial of this action,

EXHIBIT
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or for other purposes as provided by the applicable rules of civil procedure. This deposition will continue from day to day until completed.

Pursuant to Fed. R.Civ.P. 30(b)(6), the Defendant is required to designate and fully prepare one or more officers, directors, managing agents, or other persons concerning the following designated matters, who consent to testify on its behalf and whom Defendant will fully prepare to testify regarding the following designated matters and as to such information that is known or reasonably available to the organization:

I. Structure, Organization, and Authority

1. The organizational structure of State Farm's claims department, including but not limited to, P&C Claims, Consulting Services, the Central Investigations Team, the head of claims, supervisory levels above and below that person, and lines of reporting for Alabama claims.

2. The roles, responsibilities, and authority of claims representatives, supervisors, managers, and executives who handled or oversaw the Parkers' claim, including how authority levels change at each tier.

3. Identification and description of the job descriptions, training manuals, and employee manuals applicable to claims employees during the relevant period.

II. Policy and Coverage Interpretation

4. State Farm's interpretation of policy terms in the HW 2102 policy form, including the definitions, loss settlement provisions, coverage language and exclusions relating to this case.

5. State Farm's internal guidelines relating to the claims files and which documents included in it and internal guidelines relating to hail, wind and roof claims. The term internal guidelines includes but is not limited to, the Operation Guide, the jurisdictional reference, the claims manual. It includes, but is not limited to, the sections of the Operation Guide, jurisdictional resource and It would include any other written resources or oral guidance disseminated to the claims employees in this case. These also include the FMEs mentioned on page 1717 of State Farm's production.

6. Any change made to claims handling guidelines relating to wind, hail or roofing claims in the last ten years.

7. Who authored any changes to these resources in the last ten years, the substance of any change, the reason for the change, and any memoranda, drafts or other documents discussing the change.

III. Claim Handling for the Parkers

8. Your policies and procedures for handling wind/hail claims in the last ten years.

9. The handling of the Parker's claim[1],

10. The authority exercised and decisions made at each level in the handling of the Parkers' claim (adjuster, supervisor, manager, etc.).

[1] By "handling claims," we mean the actions of the defendants relating to receiving claims, investigating claims, communicating with policyholder's about claims, making claims decisions, communicating claims decisions and processing appeals. In other words, all actions taken by defendants with respect to a claim from the time it is reported until the time that it is closed.

IV. Enterprise-Wide Programs and Initiatives

11. The existence, development, purpose, and application of any program designed to limit or diminish the payout of roof claims over the last ten years.

12. Enterprise-wide initiatives, studies, or consulting firm analyses (including Accenture, McKinsey Haag, Donan, ProNet, the Wind and Hail Fire Model Enhancement Teams. etc.) addressing roof claims or indemnity payments in general over the last ten years.

13. Any State Farm statements or internal documents regarding the enterprise-wide financial impact of roofing claims (e.g., $3.5B indemnity loss).

14. The location, title, purpose, and contents of the document quoted in Exhibit A.

V. Training and Guidelines

15. All Guidelines relating to what types of documents are included in a claim file and types of documents not included in a claim file.

16. Training provided relating to appropriate documentation of the claims file.

17. The content of the training provided to the State Farm claims employees relating to the highlighted lines of the exhibit to the February 3, 2026 email to Sarah Rawls regarding production of training materials.

18. The increases in Haag and wind/hail training that began occurring around 2020 and the reasons and causes for this increase, including but not limited to any studies, memoranda, analyses or other documents by outside consultants or internal groups or individuals.

19. The names and roles of the individuals involved in making the decision to implement the training referenced in number 18.

20. The use and application of State Farm's Operation Guide, Claims Manuals, Jurisdictional References, training materials and any other claims guidance in Alabama.

VI. Financial Incentives and Evaluation

21. State Farm's methods of evaluating claims personnel, including scorecards, evaluations, and performance reviews.

22. The compensation structure for claims employees, including bonuses, raises, incentives, and metrics used to evaluate performance.

23. The evaluations of the claims employees involved in this case and produced in this case.

24. The development of the Fire Quality Reports produced as (insert bates numbers) and any similar reports used to evaluate the claims personnel in this case.)

25. Any changes made to the criteria in the fire quality reports or similar reports in the last ten years, the individuals involved in making these changes, and the reasons or causes for these changes including but not limited to any studies, memoranda, analyses or other documents by outside consultants or internal groups or individuals.

26. Financial goals, cost-benefit analyses, ROI studies, or indemnity reduction targets relating to roof claims.

27. The use of Xactanalysis, Xactware, or other software to track indemnity dollars, run reports, or evaluate claims.

VII. Patterns and Similar Incidents

28. Lawsuits in Alabama in the past five years involving alleged denial or underpayment of roof claims.

29. Depositions, affidavits, or testimony by State Farm employees relating to roof claims, including prior testimony in Hosier, Bates, Bishop, etc..

30. Consumer complaints to the Alabama DOI concerning roof claims and State Farm's responses.

31. Any pending claims or investigations relating to State Farm's practices in handling roof claims by any department of insurance.

VIII. Discovery Custodians and Repositories

32. The location and custodian of any document requested in discovery.

33. The documents produced at bates numbers 1140-1162: a description of them, when they were authored and by whom, and what they reflect.

IX. Claim Process Changes and Oversight

34. Changes made to State Farm's homeowner claims process in the last ten years relating to adjustment of roofing claims, including those testified to by Richard Davis in his deposition at pages 49 through 52.

35. In the last ten years, changes made to overall authority given to claims specialists, team managers, and section managers relating to, wind/hail, the ability to seek a total roof replacement and ability to conduct an onsite roof inspection, including those testified to by Richard Davis in his deposition at pages 49 through 52.

36. The identity of the individuals involved in suggesting and making these changes, the substance of any change, the reason for the change, and any memoranda, drafts or other documents suggesting or discussing the change.

X. Marketing and Representations

37. Marketing, sales, or promotional materials provided to consumers concerning roof coverage, replacement cost, or claim handling.

38. Any infographic provided to policyholders discussing hail or wind damage in the last five years.

XI. Your Defenses

39. The facts supporting the defenses you have asserted in this case.

XII. Underwriting

40. Underwriting guidelines relating to roofs.

41. Underwriting, pre-loss inspections, and other pre-loss information available to State Farm relating to the Parkers' home.

Pursuant to Rule 30(b)(5), Plaintiff requests that, at the time and place of the taking of said deposition, said party produce for inspection and copying the following:

1) Any documents used by the witness to obtain knowledge on behalf of the corporation or to refresh his or her recollection.

2) Any document necessary for the witness to answer on behalf of the corporation.

3) A complete copy of the claims file or any other document in State Farm's possession relating to the claim.

DATED: March 18, 2026

Respectfully submitted,

/s/ F. Inge Johnstone

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served upon all parties by ☒ electronic mail; ☐ placing same in the United States Mail, postage pre-paid; or ☐ via the Court's electronic filing system, as follows:

Katie T. Powell
Katie.powell@butlersnow.com

Sarah E. Rawls
Sarah.rawls@butlersnow.com

DATED: March 18, 2026

/s/ F. Inge Johnstone
F. INGE JOHNSTONE