

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

**MICKEY PARKER and
BARBARA W. PARKER,**

Plaintiffs,

V.

**STATE FARM FIRE AND
CASUALTY COMPANY,**

Defendant.

Case No.: 2:25-cv-00281-NAD

Opposed

**PLAINTIFFS' REPORT ON DISCOVERY DISPUTE
RESOLUTION EFFORTS AND REQUEST FOR STATUS
CONFERENCE**

The Parkers submit this report on their efforts to resolve outstanding discovery disputes and to request a status conference.

1. On November 19, 2025, the Parkers submitted a proposal to State Farm to narrow discovery as follows:

Deposition Topics

1. The existence, development, purpose, and application of the Wind/Hail Claims Focus Models, Wind/Hail Quality Plans, and Hail Focus Program.
2. The “Hail Focus Initiative” and any training or retraining of adjusters relating to identifying hail vs. wear-and-tear.

3. Enterprise-wide initiatives, studies, or consulting firm analyses in the last ten years addressing indemnity payments made for roof claims.
4. Any State Farm statements or internal documents regarding the enterprise-wide financial impact of roofing claims (e.g., \$3.5B indemnity loss) in the last ten years.
5. Training provided to adjusters and supervisors on wind/hail and roof claims, including Haag training and related programs.
6. The development, revision and application of State Farm's Operation Guidelines, Claims Manuals, Jurisdictional References, training materials and any other claim guidance applicable in Alabama relating to roofing claims in the last ten years. This topic includes the identity of the individuals involved in their development, the reasons and basis for their creation or revision, and the purpose of their creation or revision.

Requests for Production

Request for Production No. 8: Please produce any evaluations and/or scorecards for your claims department employees involved in the handling of this Claim.

Request for Production No. 9: Please produce any document **describing or explaining** your compensation structure or bonuses for State Farm claims department employees, **in the last ten years**.

Request for Production No. 10: Please produce any documents discussing financial goals or guidance for any

State Farm employees involved in the handling of the plaintiffs claim or for any claims employees in the chain of command above them, in the last ten years.

Request for Production No. 20: Please produce all analyses conducted by State Farm related to reduction of indemnity payments or amounts paid on its policyholders' roof claims in the last ten years. This request is limited to analyses that include Alabama policyholders in the dataset being analyzed or that contain findings that apply to Alabama policyholders

Request for Production No. 21: Please produce all of your Wind/Hail Claims Focus Models in place at State Farm related to homeowners' claims for the past five years that apply to the adjusting of hail claims company-wide or in the geographic area including Alabama.

Request for Production No. 23: Please produce a full copy of the document referenced in the attached testimony of Jacqueline Draper from *Hosier v. State Farm Fire & Casualty Company*. (See Exhibit 2, Draper Depo. at p. 393, from *Hosier v. State Farm*: “P&C Claims is focusing on what we can do to lower our indemnity payments related to Roofs. Last year we had an indemnity over \$3.5 Billion dollars and total of \$16.6 Billion over the last 7 years for the Enterprise on roofing.”)

Request for Production No. 24: Produce any documents relating to the Hail Focus program at State Farm that apply to the adjusting of hail claims company-wide or in the geographic area including Alabama.

Request for Production No. 25: Please produce all of your Wind/Hail Quality Plans in place at State Farm related to homeowner's claims for the past five years that include or have applicability to Alabama Policyholders.

Request for Production No. 5: Please produce an organizational chart for the State Farm claims department, including P&C claims **as it existed in September 2024.**

Additional Deposition

Third, we would like to take the deposition of Byron Galloway, who authored the affidavit attached as Exhibit 27-8 to State Farm's Opposition to the Parkers' Motion to Compel.

2. On January 27, 2026, State Farm produced an additional 2,261 pages of documents consisting of:

- Lists of training provided to the claims employees mentioned in the Parker claims file;
- Fire Quality Plans Updated 4.4.2024, 2.21.2025, 2023;
- General Policy on Performance Assessments for 2023, 2024, and 2025;
- Sections from State Farm's Operation Guide;
- Attendee Activity Reports;
- Performance Evaluations for Brandon Collins 1998- 2023 Q1, Patrick McAbee 1995-2023 Q1, and Richard Davis 1993-2022 Q3;
- Excerpts from State Farm's Standard Claims Processes; and
- Excerpts from State Farm's Jurisdictional reference.

3. On the same date, State Farm responded by letter to the Plaintiffs' November 19, 2025 letter. State Farm objected entirely to deposition topics 1, 3, and 4. However, State Farm agreed to produce a witness to testify on:

- Training provided to Collins, McAbee, Rojas, and Davis.
- Training transcripts.
- Relevant provisions of the claims handling procedures that may have been used to adjust claims alleged to have arisen from the weather event that occurred on the date of the loss.
- Application of relevant sections of the Operation Guide for handling of the underlying claim that were applicable and in effect during the relevant timeframe along with the applicable Standard Claim Processes and Jurisdictional References in effect on the date of loss.

4. State Farm maintained its objections with regard to the document requests with the exception of the production of the previously mentioned documents.

5. State Farm agreed to produce Mr. Galloway for deposition but objected to any questioning "outside of the four corners of the affidavit."

6. On February 3, 2026, counsel for the Parkers sent counsel for State Farm a highlighted list of trainings that had been taken by State Farm employees Collins, Davis, Rojas, and McAbee. A copy of this list

has been attached as Exhibit 1. State Farm has agreed to produce these, and its counsel indicated that they were in her possession on March 18, 2026. However, to date these videos have not been produced.

7. On February 4, 2026, the Parkers noticed the 30(b)(6) deposition of State Farm. State Farm served objections on March 4, 2026. This deposition has now been set for May 20, 2026.¹

8. While numerous objections remain, the 30(b)(6) may eliminate some of these or provide information helpful to narrowing these disputes. However, Plaintiffs do ask this Court to set a hearing to discuss State Farm's objections to topics 5, 6, 7, 17, 18, 19, and 33, which relate directly to documents produced by State Farm in this case.

9. Based on the current status, the Plaintiffs do anticipate returning to the Court for additional rulings on certain discovery relating to State Farm's alleged pattern and practice of low-balling roof claims.

10. The Plaintiffs believe that a hearing will assist the parties and the Court in resolving outstanding discovery disputes, adjust scheduling deadlines, and to otherwise secure the just, speedy and inexpensive determination of this case.

¹ Copies of the notice and objections are attached hereto Exhibits 2 and 3 respectively.

WHEREFORE, the Parkers ask this Court to set a conference to discuss production of the training videos, resolution of the deposition topics, the course of remaining discovery and to discuss scheduling.

Dated: April 29, 2026

Respectfully submitted,

/s/ F. Inge Johnstone

F. INGE JOHNSTONE

(ASB-2663-E68F)

JOHNSTONE TRIAL LAW, LLC

P.O. Box 36128

Birmingham, AL 35236

(205) 771-4009 – Phone

(205) 771-4049 – Fax

ijohnstone@policyholderslawyers.com

CHRISTINA D. CROW

(ASB-0637-C58C)

JINKS CROW, PC

P.O. Box 350

Union Springs AL 36089

(334) 738-4225 – Phone

Christy.crow@jinkscrow.com

CHARLES HUDSON

(ASB-5257-G67U)

JINKS CROW, PC

322 Catoma Street

Montgomery, AL 36104

(334) 738-4225 – Phone

(334) 738-4229 – Fax

charlie.hudson@jinkscrow.com

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of April, 2026, I served the foregoing on all parties to this action by electronic mail, as follows:

Sarah E. Rawls

Sarah.Rawls@butlersnow.com

Katherine T. Powell

Katie.Powell@butlersnow.com

/s/ F. Inge Johnstone

F. INGE JOHNSTONE