

<u>Document</u>	<u>SF Description in Lizana⁵</u>	<u>SF Response in Bossier</u>
2005 Hurricane Katrina Adjuster Training	Specific issues related to handling of wind/hail claims	None ⁶
2005 Hurricane Katrina Adjuster Training; Induction Center Flood Training Powerpoint	Specific issues related to Hurricane Katrina adjuster training	None (see footnote 6)
2005 Hurricane Katrina Adjuster Training - Louisiana; Central Consulting Services	Specific issues related to Hurricane Katrina adjuster training	None (see footnote 6)
Request for Responsive Documents 8/2006; Hurricane Sweep	Specific instructions/training related to handling of Hurricane Katrina claims	None (see footnote 6)
Dave Randel's Desk File Pertaining to Research Compiled to Manage Hurricane Catastrophe	Specific issues related to handling of hurricane claims	None (see footnote 6)
Terry Blalock's Desk File Pertaining to Research Compiled to Manage Hurricane Catastrophe	Specific issues related to handling of hurricane claims	None (see footnote 6)
Lansing Vargo's Working File Relating to Hurricane Katrina	Specific issues related to handling of hurricane claims	None (see footnote 6)

⁵*Lizana v. State Farm*, 1:08-cv-501-LTS-MTP at [30].

⁶While State Farm generically maintains it “produced numerous documents that, in his motion, Plaintiff wrongfully claims have not been produced”, it has failed to identify any specific document as having been produced among the 9,000 pages contained on two unlabeled, unindexed CD’s produced in discovery. A lack of such identification obviously fails to establish that any particular document was, in fact, produced in this case and constitutes an admission by omission.

<u>Document</u>	<u>SF Description in Lizana</u>	<u>SF Response in Bossier</u>
OG 70-50, Supervising Litigation Write Your Own Litigation Guidelines (Flood) (“linked” (for electronic access with the click of a button) in State Farm’s “Flood Claim Processing” Operation Guide, OG 71-06)	NA ⁷	Related to supervising litigation, not handling Hurricane Katrina claims in general or Plaintiff’s claim specifically. Produced to the Court <i>in camera</i> .
OG 70-135, CASE System Management	NA (see footnote 7)	Related to license and maintenance of software, not handling Hurricane Katrina claims in general or Plaintiff’s claim specifically. Produced to the Court <i>in camera</i> .
OG 70-251, Integrity Danger Signs	NA (see footnote 7)	Related to reviewing conduct by State Farm adjusters, not handling Hurricane Katrina claims in general or Plaintiff’s claim specifically. Produced to the Court <i>in camera</i> .
OG 71-040, State Farm Premier Service Program	NA (see footnote 7)	Trade secret ⁸
OG 79-001, Catastrophe Program - General Principles	NA (see footnote 7)	Related to administration, not handling Hurricane Katrina claims in general or Plaintiff’s claim specifically. Produced to the Court <i>in camera</i> .
OG 79-003, Catastrophe Program - Independent Adjuster Drafts	NA (see footnote 7)	Related to administration, not handling Hurricane Katrina claims in general or Plaintiff’s claim specifically. Produced to the Court <i>in camera</i> .

⁷This document is not contained on State Farm’s privilege log in the *Lizana v. State Farm* case.

⁸It is unclear whether this document was produced *in camera*.

<u>Document</u>	<u>SF Description in Lizana</u>	<u>SF Response in Bossier</u>
OG 79-007, National Catastrophe Program Claim and Catastrophe section Manager- F&C Responsibilities	NA (see footnote 7)	Related to administration, not handling Hurricane Katrina claims in general or Plaintiff's claim specifically. Produced to the Court <i>in camera</i> .
OG-79-008, Catastrophe Team Manager	NA (see footnote 7)	Related to administration, not handling Hurricane Katrina claims in general or Plaintiff's claim specifically. Produced to the Court <i>in camera</i> .
OG 79-009, National Catastrophe Team Members and Regional Catastrophe Volunteers	NA (see footnote 7)	Related to administration, not handling Hurricane Katrina claims in general or Plaintiff's claim specifically. Produced to the Court <i>in camera</i> .
OG 79-011, Regional Catastrophe Coordinator	NA (see footnote 7)	Related to administration, not handling Hurricane Katrina claims in general or Plaintiff's claim specifically. Produced to the Court <i>in camera</i> .
OG 79-012, Catastrophe Program - Agent Loss Reporting	NA (see footnote 7)	Related to administration, not handling Hurricane Katrina claims in general or Plaintiff's claim specifically. Produced to the Court <i>in camera</i> .
OG 79-014, Catastrophe Office Claim Processing Procedure	NA (see footnote 7)	Related to administration, not handling Hurricane Katrina claims in general or Plaintiff's claim specifically. Produced to the Court <i>in camera</i> .
OG 79-021, Special Catastrophe Operations	NA (see footnote 7)	Trade secret. ⁹

⁹Anything relating to the Special Investigative Unit is critical in this case as this claim was reviewed by said unit prior to the filing of litigation. It is unclear whether this document has been produced *in camera*.

<u>Document</u>	<u>SF Description in Lizana</u>	<u>SF Response in Bossier</u>
OG 781-170, Estimates and Reports	NA (see footnote 7)	Did not apply to Hurricane Katrina and, therefore, not related to the handling Hurricane Katrina claims in general or Plaintiff's claim specifically. Produced to the Court <i>in camera</i> . ¹⁰
OG 795-120, Catastrophe Management Structure	NA (see footnote 7)	Related to administration, not handling Hurricane Katrina claims in general or Plaintiff's claim specifically. Produced to the Court <i>in camera</i> .
State Farm's Fire Claim Code Manual (referred to by Payments and Coding Operation Guide, OG 74-04)	NA (see footnote 7)	Related to administration, not handling Hurricane Katrina claims in general or Plaintiff's claim specifically. Produced to the Court <i>in camera</i> .
Catastrophe Induction Manual	NA (see footnote 7)	Defendant only states, in footnote 1, that "as shown in the chart, the document Plaintiff obtained from the internet, [73] at 4 & n.4, was already obsolete before Hurricane Katrina in or about July 2001 and, therefore, not related to handling Hurricane Katrina claims in general or Plaintiff's claim specifically." (See footnote 10)
The State Farm "Employee Manual" expressly referred to in the 2004 State Farm "Code of Conduct"	NA (see footnote 7)	Related to employment with State Farm, not handling Hurricane Katrina claims in general or Plaintiff's claim specifically. Produced to the Court <i>in camera</i> .

¹⁰Nothing is provided to establish this OG's inapplicability to Hurricane Katrina claims. Any documents in existence stating it does not apply to Hurricane Katrina claims would fall within the Court's order.

Document

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Steve Burke notes

NA (see footnote 7)

“For some such documents already in Plaintiff’s possession, such as the ‘Rick Moore file’ that Plaintiff produced to State Farm, it is clear on the face of the documents that Plaintiff’s counsel obtained them from other Hurricane Katrina litigation.”

Rick Moore file containing emails giving directives to team managers for the handling of Hurricane Katrina claims

NA (see footnote 7)

“For some such documents already in Plaintiff’s possession, such as the ‘Rick Moore file’ that Plaintiff produced to State Farm, it is clear on the face of the documents that Plaintiff’s counsel obtained them from other Hurricane Katrina litigation.”

5.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

¹¹Presumably State Farm’s counsel is referring to some of the documents listed in the *Lizana* privilege log. It is significant that State Farm does not claim to have produced all of these documents, thus, it is uncontradicted that at least some of the *Lizana* documents listed by Plaintiff have not been produced contrary to the Court’s order. It is up to us to guess as to which documents those are, since State Farm claims some have been produced. Counsel for Plaintiff states as an officer of the Court that no documents produced by State Farm in this case bear any title or description as contained on the *Lizana* privilege log.