Attached please find correspondence from Attorney General Hunter dated today, July 25, 2020.

Respectfully, Stephany Lively *Executive Assistant*

OKLAHOMA OFFICE OF THE ATTORNEY GENERAL

313 NE 21st Street, Oklahoma City, OK 73105 Tel: (405)522-4391 Fax: (405)522-0669



Mike Hunter Attorney General

July 25, 2020

Jeffrey Dailey Chief Executive Officer Farmers Group, Inc. 6301 Owensmouth Avenue Woodland Hills, CA 71367

RE: Investigation of Farmers Insurance - Earthquake Claims Handling

Dear Mr. Dailey:

It has come to my attention that Farmers has handled a number of claims involving earthquakes. I have reviewed recently filed lawsuits related to Farmers' denial of earthquake claims in Oklahoma. We have concerns with business practices employed by Farmers to deny what appears to be vast majority of all such claims.

In an effort to further and fully investigate these concerns, we are requesting Farmers cooperate and voluntarily produce certain documents and testimony to this office which have been produced or provided in the following civil matters presently pending here in Oklahoma and which now likewise appear at issue in the recently filed case of *Garlick v. Farmers Insurance Company, Inc., et al*, Case No. CJ-20-2851, filed in The District Court of Oklahoma County, and by our count more than forty (40) other recently filed cases. Documents to be produced are as follows:

- Documents and records in your custody, possession or control, which were provided in the civil lawsuits of *Traylor v. Foremost Insurance Company, et al.*, In The District Court of Oklahoma County, Case No. CJ-17 366 and *Good v. Farmers Insurance Company, et al.*, In the District Court of Payne County, Case No. CJ-207-128;
- 2) Copies of any and all deposition transcripts including videotapes and exhibits of the depositions of: all Farmers' executives, employees, adjusters, agents, representatives, vendors or engineers taken in the aforementioned cases;
- 3) Documents and records in your custody, possession or control, which may be produced in the future in the civil lawsuit of *Garlick v. Farmers Insurance Company, Inc., et al,* Case No. CJ-20 2851; and lastly,

313 N.E. 21st Street • Oklahoma City, OK 73105 • (405) 521-3921 • Fax: (405) 521-6246 22 ORA 32 Savage 000010 recycled paper 4) A list of any upcoming depositions of Farmers' executives, employees, adjusters, agents, representatives, vendors, or engineers in relation to any of the aforementioned cases, including the date, time and location, of any such deposition so scheduled.

As the Attorney General for the State of Oklahoma I am charged with protecting all Oklahomans from criminal violations of the law. The records requested herein are necessary for my office to fully investigate whether or not Farmers may have violated Oklahoma law. I trust Farmers will do its very best to cooperate with my investigation of these allegations. If, however, Farmers is unwilling to voluntarily cooperate and produce the documents and testimony requested, I have authorized my office to procure Farmers' compliance through our subpoena power of Farmers, its counsel and opposing counsel involved in these actions.

I request you advise at your earliest opportunity Farmers' position in complying with the State's request.

Sincerely.

Mike Hunter Oklahoma Attorney General

cc via email: Chris Martin, Martin Disiere, Jefferson & Wisdom martin@mdjwlaw.com

Phil Richards, Richards Connor prichards@richardsconnor.com

Clyde Muchmore, Crowe & Dunlevy clyde.muchmore@crowedunlevy.com

Michael Burrage, Witten Burrage mburrage@wittenburragelaw.com

Reggie Witten, Whitten Burrage rwhitten@whittenburragelaw.com

Jeff D. Marr, Marr Law Firm jeffdmarr@marrlawfirm.com

Mike Angelovich, Nix Patterson, LLP mangelovich@nixlaw.com