

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION**

**DENNIS R. and S. IMANI WOULLARD  
individually and on behalf of those  
similarly situated**

**PLAINTIFFS**

**VS.**

**CIVIL ACTION NO. 1:06-CV-1057-LTS-RHW**

**STATE FARM FIRE AND CASUALTY  
COMPANY**

**DEFENDANT**

**ATTORNEY GENERAL'S MOTION TO INTERVENE  
TO ENFORCE STATE COURT SETTLEMENT AGREEMENT**

COMES NOW, Jim Hood, Attorney General for the State of Mississippi, *ex rel.* the State of Mississippi, pursuant to Fed. R. Civ. P. 24, and moves this Court for permission to intervene in this matter or, alternatively, for permission to participate in the February 28, 2007, hearing in this matter, and in support thereof would show unto this Honorable Court the following:

1. The Attorney General seeks intervention in this case in order to enforce the terms of his state court Settlement Agreement, attached hereto as Exhibit A, with State Farm Fire and Casualty Company, Defendant herein.

2. The state court Settlement Agreement requires State Farm to establish an orderly, fair, and prompt administrative procedure to reevaluate Hurricane Katrina claims in Harrison, Hancock, and Jackson Counties based upon criteria and guidelines approved by this Court, and enforceable by legal action in this Court. The proposed class settlement agreement submitted by State Farm to this Court does not satisfy this requirement.

3. As a result of State Farm's failure to establish an acceptable procedure for the reevaluation and settlement of claims which could be approved by this Court, State Farm is not in compliance with its Settlement Agreement with the Attorney General.

4. Therefore, the Attorney General respectfully requests that this Court allow him to intervene in this case to protect the interests of the State of Mississippi by filing his Motion to Enforce State Court Settlement Agreement, attached hereto as Exhibit B.

5. Alternatively, the Attorney General respectfully requests leave of this Court to participate in the February 28, 2007, hearing set in this matter.

6. The grounds in support of the Attorney General's arguments are set forth in the Attorney General's memorandum of authorities in support of his motion to intervene submitted herewith and incorporated and referenced as if fully set forth herein.

WHEREFORE, PREMISES CONSIDERED, Attorney General Jim Hood respectfully requests that this Honorable Court grant his Motion to Intervene.

Respectfully submitted, this the 22<sup>nd</sup> day of February, 2007,

JIM HOOD, ATTORNEY GENERAL FOR THE STATE OF MISSISSIPPI, *EX REL.* THE STATE OF MISSISSIPPI

BY: /s Mary Jo Woods  
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**CERTIFICATE OF SERVICE**

I, Mary Jo Woods, Special Assistant Attorney General of the State of Mississippi, do hereby certify that on February 22, 2007, I electronically filed the foregoing with the Clerk of the Court using the ECF system which sent notification of such filing to the following:

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This 22<sup>nd</sup> day of February, 2007.

/s Mary Jo Woods  
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