

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

THOMAS C. & PAMELA MCINTOSH

PLAINTIFFS

VERSUS

1:06-cv-1080-LTS-RHW

**STATE FARM FIRE AND CASUALTY COMPANY;
FORENSIC ANALYSIS & ENGINEERING CORP.; and
E. A. RENFROE & COMPANY, INC., et al**

DEFENDANTS

AFFIDAVIT

I, Chris Blair, having been first duly sworn, state:

1. I am of at least 21 years of age and of sound mind.
2. I am employed by State Farm Mutual Automobile Insurance Company in the Claims Solution Center and have been for fourteen (14) years. I am a Systems Analyst and have held this position for seven (7) years. As a part of my job, I am able to access the Claims Services Records (CSR) database. I have worked with the CSR database since its implementation in May, 1994.
3. The CSR database provides a record showing each occurrence of an electronic claim file being accessed through CSR and who accessed the electronic claim file by State Farm assigned alias. It further shows the date and time each was file was "released" to the system. Released means the access by the user was concluded in CSR.
4. The alias of Kerri Rigsby was HVWZ, which I have personally confirmed in the CSR database.
5. The alias of Cori Moran was HYNV, which I have personally confirmed in the CSR database.

6. Attached to this Affidavit as Exhibit A is a spreadsheet depicting a true and accurate representation of the CSR database access record by Kerri Rigsby, alias HVWZ, on the dates June 2, June 3, and June 4, 2006. It truly and accurately depicts the files that were accessed and the order in which they were released from CSR on the aforementioned dates by Kerri Rigsby, alias HVWZ.

7. Attached to this Affidavit as Exhibit B is a spreadsheet depicting a true and accurate representation of the CSR database access record by Cori Moran, alias HYNV, on the dates June 2, June 3, and June 4, 2006. It truly and accurately depicts the files that were accessed and the order in which they were released from CSR on the aforementioned dates by Cori Moran, alias HYNV.


CHRIS BLAIR

STATE OF ILLINOIS
COUNTY OF McLEAN

SWORN TO AND SUBSCRIBED BEFORE ME on this the 4th day of
September, 2007.


NOTARY PUBLIC

MY COMMISSION EXPIRES:

7/24/10

