

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION

----- X

GLEND A SHOWS, et al., :  
 :  
 Plaintiffs, : CIVIL ACTION NO. 1:07-CV-  
 : 709-WHB-LRA  
 - against - :  
 :  
 STATE FARM FIRE AND CASUALTY CO. and :  
 FORENSIC ANALYSIS & ENGINEERING CO., :  
 et al., :  
 :  
 Defendants. :  
----- X

**DEFENDANT STATE FARM FIRE AND CASUALTY COMPANY’S  
MOTION TO DISQUALIFY THE BARRETT LAW OFFICE, P.A.,  
NUTT & MCALISTER, P.L.L.C., AND THE LOVELACE LAW FIRM, P.A.**

Comes now Defendant State Farm Fire and Casualty Company (“State Farm”), and hereby moves this Honorable Court for an order to disqualify the Barrett Law Office, P.A., Nutt & McAlister, P.L.L.C., the Lovelace Law Firm, P.A., and the entity now known as the Katrina Litigation Group from representing Plaintiffs Glenda Shows, et al., in this civil suit brought pursuant to the Racketeer Influenced and Corrupt Organizations Act (“RICO”), 18 U.S.C. §§ 1961-1968. In support of this Motion to Disqualify, State Farm submits the accompanying Memorandum of Law and the Declaration of Professor Charles W. Wolfram demonstrating that Plaintiffs’ counsel has committed numerous egregious ethical violations which warrant their disqualification from this case.

WHEREFORE, upon consideration of this motion and supporting documents, State Farm respectfully requests that this Honorable Court enter an order granting its Motion to Disqualify the Barrett Law Office, P.A., Nutt & McAlister, P.L.L.C., the Lovelace Law Firm, P.A., and the entity now known as the Katrina Litigation Group from representing Plaintiffs in this case, and to further order that Plaintiffs may not use any item obtained through their counsels' unethical activities, including, but not limited to, all documents and information obtained from State Farm in derogation of the discovery rules, as evidence against State Farm in this litigation.

Dated: December 18, 2007

RESPECTFULLY SUBMITTED,

STATE FARM FIRE AND CASUALTY  
COMPANY

HICKMAN, GOZA & SPRAGINS, PLLC  
Attorneys at Law  
Post Office Drawer 668  
Oxford, MS 38655-0668  
(662) 234-4000

BY:           /s/ H. Scot Spragins            
H. SCOT SPRAGINS, MSB # 7748

*CERTIFICATE OF SERVICE*

I hereby certify that on December 18, 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:

Harry R. Allen  
[hallen@achalaw.com](mailto:hallen@achalaw.com)  
[ascafide@achalaw.com](mailto:ascafide@achalaw.com)  
[sblackledge@achalaw.com](mailto:sblackledge@achalaw.com)

Don John W. Barrett  
[dbarrett@barrettlawoffice.com](mailto:dbarrett@barrettlawoffice.com)  
[lmims@barrettlawoffice.com](mailto:lmims@barrettlawoffice.com)

James Francis Hibey - PHV  
[hibeyj@howrey.com](mailto:hibeyj@howrey.com)

Christine Lipsey - PHV  
[clipsey@mcglinchey.com](mailto:clipsey@mcglinchey.com)  
[jrobert@mcglinchey.com](mailto:jrobert@mcglinchey.com)  
[jmatthews@mcglinchey.com](mailto:jmatthews@mcglinchey.com)

Mary E. McAlister  
[mcalister@davidnutt.com](mailto:mcalister@davidnutt.com)  
[paralegals@davidnutt.com](mailto:paralegals@davidnutt.com)

Margaret Puckett McArthur  
[mmcarthur@achalaw.com](mailto:mmcarthur@achalaw.com)

Michael Clark McCabe , Jr  
[mmccabe@achalaw.com](mailto:mmccabe@achalaw.com)  
[kmabou@achalaw.com](mailto:kmabou@achalaw.com)

David Neil McCarty  
[dmccarty@davidnutt.com](mailto:dmccarty@davidnutt.com)  
[paralegals@davidnutt.com](mailto:paralegals@davidnutt.com)

Sherrie L. Moore  
[smoore@achalaw.com](mailto:smoore@achalaw.com)  
[vkelly@achalaw.com](mailto:vkelly@achalaw.com)  
[ascafide@achalaw.com](mailto:ascafide@achalaw.com)  
[sblackledge@achalaw.com](mailto:sblackledge@achalaw.com)  
[mthomassie@achalaw.com](mailto:mthomassie@achalaw.com)  
[cnickoles@achalaw.com](mailto:cnickoles@achalaw.com)

David Aaron Norris  
[dnorris@mcglinchey.com](mailto:dnorris@mcglinchey.com)  
[ctodd@mcglinchey.com](mailto:ctodd@mcglinchey.com)  
[vbarr@mcglinchey.com](mailto:vbarr@mcglinchey.com)  
[vmcqueen@mcglinchey.com](mailto:vmcqueen@mcglinchey.com)

H. Hunter Twiford , III  
[htwiford@mcglinchey.com](mailto:htwiford@mcglinchey.com)  
[jrouse@mcglinchey.com](mailto:jrouse@mcglinchey.com)  
[mmason@mcglinchey.com](mailto:mmason@mcglinchey.com)  
[wsims@mcglinchey.com](mailto:wsims@mcglinchey.com)  
[kcallais@mcglinchey.com](mailto:kcallais@mcglinchey.com)

Joseph Walker - PHV  
[walkerj@howrey.com](mailto:walkerj@howrey.com)

Derek A. Wyatt  
[dwyatt@davidnutt.com](mailto:dwyatt@davidnutt.com)  
[paralegals@davidnutt.com](mailto:paralegals@davidnutt.com)  
[mcalister@davidnutt.com](mailto:mcalister@davidnutt.com)

and I hereby certified that I have mailed by United States Postal Service the document to the following non-ECF participants:

**No manual recipients**

*/s/ H. Scot Spragins*