

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

UNITED STATES OF AMERICA *ex rel.*
CORI RIGSBY and KERRI RIGSBY

RELATORS/COUNTER-DEFENDANTS

v.

CASE NO. 1:06cv433-LTS-RHW

STATE FARM MUTUAL INSURANCE COMPANY DEFENDANT/COUNTER-PLAINTIFF

and

FORENSIC ANALYSIS ENGINEERING CORPORATION;
EXPONENT, INC.; HAAG ENGINEERING CO.;
JADE ENGINEERING; RIMKUS CONSULTING GROUP INC.;
STRUCTURES GROUP; E. A. RENFROE, INC.;
JANA RENFROE; GENE RENFROE; and
ALEXIS KING

DEFENDANTS

**STATE FARM FIRE AND CASUALTY COMPANY'S
RESPONSE IN OPPOSITION TO MOTION
FOR ADMISSION PRO HAC VICE REGARDING TODD P. GRAVES**

***(Incorporating by Reference Pending Disqualification Motion
Pending before Honorable L.T. Senter, Jr.)***

Defendant/Counter-Plaintiff State Farm Fire and Casualty Company, improperly denominated in the First Amended Complaint as “State Farm Mutual Insurance Company” (“State Farm” or “Defendant”), subject to all its defenses, including its Rule 9 & 12 defenses, submits this Response in Opposition to Motion for Admission Pro Hac Vice regarding Todd P. Graves. (“Graves PHV Motion”). ([148].) State Farm would show:

1. For the same reasons set forth in its April 8, 2008 “Motion to Disqualify Bartimus, Frickleton, Robertson & Gorny, PC and Graves Bartle & Marcus, LLC,” (“Disqualification Motion”) ([103]) and the accompanying memorandum ([104]), State Farm opposes the Graves PHV Motion.

2. State Farm hereby incorporates by reference its Disqualification Motion and its accompanying memorandum, as well as docket items ([128, 133 & 134].)

WHEREFORE, PREMISES CONSIDERED, State Farm prays that its Disqualification Motion will be granted and the Graves PHV Motion denied.

This the 30th day of April, 2008.

Respectfully submitted,

STATE FARM FIRE AND CASUALTY COMPANY

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PRO HAC VICE

CERTIFICATE OF SERVICE

I, E. Barney Robinson III, one of the attorneys for State Farm Fire and Casualty Company herein do hereby certify that I have this day caused a true and correct copy of the foregoing instrument to be delivered to the following, via the means directed by the Court's Electronic Filing System:

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THIS the 30th day of April, 2008.

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