

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

UNITED STATES OF AMERICA, <i>ex rel.</i>	)	
Cori Rigsby, <i>et al.</i> ,	)	
	)	
Plaintiff,	)	Civil No. 1:06cv433 LTS-RHW
	)	
v.	)	
	)	
STATE FARM MUTUAL INS. CO., <i>et al.</i>	)	
	)	
Defendants.	)	
	)	

**RELATORS’ REPLY MEMORANDUM IN SUPPORT OF MOTION FOR *PRO HAC VICE* ADMISSION OF TODD P. GRAVES AND REQUEST FOR HEARING**

Having made scurrilous and unsubstantiated accusations of wrongdoing against former United States Attorney Todd P. Graves and the law firm of Graves Bartle & Marcus LLC (“GBM”) in its recently-filed motion to disqualify, State Farm Fire and Casualty Company (“State Farm”) now seeks to preclude Mr. Graves from personally appearing before this Court to defend himself. These are the desperate actions of a desperate company.

There is no basis for denying Mr. Graves *pro hac vice* admission to this Court. There is no basis for disqualifying Mr. Graves and GBM from continuing to represent the Government’s interests in this matter. There is not a wisp of evidence that Mr. Graves or any other GBM attorney violated the Mississippi Rules of Professional Conduct or any other ethical standards by which they may be judged. GBM did not access State Farm’s confidential databases, GBM did not make any improper payments to Cori and Kerri Rigsby, and GBM was not associated with the Scruggs Katrina Group or any successor entity.

So this unfortunate side show can finally be brought to an end, Relators respectfully request that the Court convene a hearing on these matters. State Farm should be ordered to come

forward with any evidence it possesses to show that Relators' counsel engaged in any conduct warranting disqualification under the applicable ethical standards. If State Farm fails to come forward with such evidence, sanctions should be imposed on both the company and its attorneys Jeffrey A. Walker, Robert C. Galloway, E. Barney Robinson III and Benjamin M. Watson.

Respectfully submitted,

**GRAVES BARTLE & MARCUS, LLC**

s/ DAVID L. MARCUS

David L. Marcus, *pro hac vice*  
Matthew V. Bartle, *pro hac vice*  
1100 Main Street  
Suite 2600  
Kansas City, MO  
816-256-3181  
Fax: 816-222-0534

ATTORNEYS FOR RELATOR

**CERTIFICATE OF SERVICE**

I, David L. Marcus, one of the attorneys for Cori and Kerri Rigsby, 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:

BARTIMUS, FRICKLETON, ROBERTSON & GORNY, P.C.

Michael Rader  
11150 Overbrook Road  
Suite 200  
Leawood, KS 66211  
913-266-2300  
Fax: 913-266-2366

-and-

Edward D. Robertson, Jr., *pro hac vice*  
Anthony L. Dewitt, *pro hac vice*  
Mary Doerhoff Winter  
715 Swifts Highway  
Jefferson City, MO 65109  
573-659-4454  
Fax: 573-659-4460

COUNSEL FOR RELATORS

Jeffrey S. Bucholtz  
Joyce R. Branda  
Patricia R. Davis  
Jay D. Majors  
UNITED STATES DEPARTMENT OF JUSTICE  
Civil Division  
P.O. Box 261  
Ben Franklin Station  
Washington, DC 20044  
(P) 202-307-0264  
(F) 202-514-0280

and

Dunnica O. Lampton  
Alfred B. Jernigan, Jr.  
Felicia C. Adams  
UNITED STATES ATTORNEY'S OFFICE  
Southern District of Mississippi  
188 East Capitol Street  
Suite 500  
Jackson, MS 39201  
(P) 601-965-4480  
(F) 601-965-4409

ATTORNEYS FOR THE UNITED STATES

H. Hunter Twiford III  
Stephen F. Schelver  
Candy Burnette  
MCGLINCHEY STAFFORD, PLLC  
Suite 1100, City Centre South  
200 South Lamar Street (39201)  
P.O. Box 22949  
Jackson, MS 39225-2949  
(P) 601-960-8400  
(F) 601-960-8432

John T. Boese  
FRIED, FRANK, HARRIS, SHRIVER & JACOBSON, LLP  
1001 Pennsylvania Avenue, NW  
Suite 800  
Washington, DC 20004-2505  
(P) 202-639-7220

ATTORNEYS FOR DEFENDANTS E.A. RENFROE & COMPANY, INC.  
GENE RENFROE AND JANA RENFROE

Jeffrey A. Walker  
Robert C. Galloway  
E. Barney Robinson III  
Benjamin M. Watson  
BUTLER, SNOW, O'MARA, STEVENS & CANNADA, PLLC  
17<sup>th</sup> Floor, Regions Plaza  
P.O. Box 22567  
Jackson, MS 39225-2567  
(P) 601-948-5711  
(F) 601-985-4500

ATTORNEYS FOR STATE FARM FIRE AND CASUALTY COMPANY

THIS the 1st day of May, 2008

s/ David L. Marcus