

IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

FILED IN DISTRICT COURT
OKLAHOMA COUNTY

JOHN ADAIR,

Plaintiff,

v.

STATE FARM FIRE AND CASUALTY
COMPANY and TIM CUSTER
INSURANCE AGENCY, INC.,

Defendants.

JAN 23 2026

RICK WARREN
COURT CLERK

Case No. CJ-2023-6121

Hon. Brent Dishman

DEFENDANT STATE FARM'S MOTION FOR PARTIAL CONSOLIDATION
FOR CORPORATE DISCOVERY PURPOSES ONLY
PURSUANT TO LOCAL DISTRICT COURT RULE 9

As the *Adair* Court acknowledged during the January 9 hearing on the *Adair*, *Cox*, and *Pruitt* Plaintiffs' motion for appointment of discovery master,¹ those cases involve distinct, case-specific issues—including different agent defendants and individual claims. Nonetheless, Plaintiffs' counsel—in those three cases, and *nineteen others* currently pending in this County—have pursued a calculated discovery strategy focused not on State Farm's handling of any individual claim, but rather the alleged conduct of State Farm at the corporate level to justify identical and egregiously expansive "Corporate Discovery." In support of this Corporate Discovery, Plaintiffs have propounded nearly *identical* written discovery (with *Adair* and *Cox* being slightly different because earlier served) and deposition notices of *identical* State Farm corporate representative witnesses on *identical* topics. For the avoidance of doubt, State Farm

¹ Plaintiff's Motion for Appointment of Discovery Master, *John Adair v. State Farm Fire and Cas. Co. and Tim Custer Ins. Agency, Inc.*, No. CJ-2023-6121; *Pruitt v. State Farm*, No. CJ-2024-7828; *Cox v. State Farm*, CJ-2024-7630 (Dec. 4, 2025).

believes this Corporate Discovery is irrelevant to each Plaintiff's highly individualized claims. And State Farm agrees with the *Adair* Court that individual issues pervade the claim-specific discovery. That being said, due to the way Plaintiffs have framed their Corporate Discovery around a purported "scheme," each of the 22 pending actions against State Farm in this County implicates numerous shared discovery issues.

Plaintiffs' counsel's hypothesized corporate "scheme" to underpay claims is untethered from the facts of each case. Indeed, Plaintiffs have made no effort, as of yet, to take discovery of the individual claims specialists who evaluated and handled the various plaintiffs' claims to determine what led to the claim determination. Rather, Plaintiffs' counsel has propounded Corporate Discovery—hundreds of copied-and-pasted discovery requests for corporate-level documents and multiple deposition notices for the same topics and/or high-ranking executives—with the goal of expanding State Farm's discovery obligations miles beyond what is relevant and proportional as to the individual claims, such that discovery is cost and time prohibitive. State Farm has, and continues to object to, this outsized discovery. Regardless, State Farm must not be doubly prejudiced by the *way* such discovery is conducted. Thus, while State Farm maintains its objection to Plaintiffs' counsel's calculated attempt to partially consolidate only 3 of 22 separate actions against State Farm in this County, State Farm—as this Court did at the January 9 hearing—acknowledges the significant efficiencies to be gained from a partial consolidation, so long as it is one that comports with the requirements of Oklahoma law.

As such, in the interests of judicial efficiency and pursuant to 12 O.S. § 2018(C) and Local District Court Rule 9, State Farm respectfully requests that the Court enter an order consolidating,

for limited Corporate Discovery purposes only,² the following pending actions (the “Consolidation Candidates”) into the lowest-numbered case, *Adair*:

- **Adair v. State Farm and Tim Custer Ins. Agency, Inc.*, Case No. CJ-2023-6121;
- *Adamo v. State Farm and Brittanie Portillo McCoy and Brittanie Portillo Ins. Agency, Inc.*, Case No. CJ-2025-1844;
- *Black v. State Farm and Randall Young Insurance Agency, Inc.*, Case No. CJ-2024-7827;
- *Davis v. State Farm, Grant Gingerich, and Grant Gingerich Ins. Agency, Inc.*, Case No. CJ-2025-2883;
- *Gabel v. State Farm and Bill Kolb*, Case No. CJ-2025-1861;
- **Giertz v. State Farm and Jennifer Lowder Ins. Agency, Inc.*, Case No. CJ-2025-1132;
- *Hardy v. State Farm, Corbin Cooper, and Lilly June, Inc. d/b/a Corbin Cooper Insurance Agency, Inc.*, Case No. CJ-2025-3535;
- *Harris v. State Farm, Curtis L. Davidson and Eric Davidson Agency, LLC*, Case No. CJ-2024-8002;
- *Hursh v. State Farm, Mark D. Welty, and Mark D. Welty Ins. Agency, Inc.*, Case No. CJ-2025-2626;
- **Jacob Cox v. State Farm and Elizabeth Gallery*, Case No. CJ-2024-7630;
- *Maher v. State Farm and Terry M. Amacher*, Case No. CJ-2024-8245;
- *Martin v. State Farm and Bobby Lewis Ins. Agency, Inc.*, Case No. CJ-2025-2627;
- *Methvin v. State Farm and Kristopher “Nickey” Lee*, Case No. CJ-2025-1031;
- *Moong Sian Wong-Faust v. State Farm and Grant Gingerich Ins. Agency*, Case No. CJ-2025-1675;
- *Osborn v. State Farm and Steve Wright*, Case No. CJ-2025-1638;
- **Pruitt v. State Farm and Jim Campos Agency, Inc.*, Case No. CJ-2024-7828;
- *Riley v. State Farm and Oanh Stanger Insurance Agency, Inc.*, Case No. CJ-2025-1328;
- *Stearns v. State Farm and Dennis Chaumont*, Case No. CJ-2025-1704;

² State Farm reserves all rights to oppose any later motion to consolidate these cases for any other purposes, including trial. Cases with an asterisk (*) are already assigned to this Court.

- *Walter K. Weber v. State Farm and Cherie R. Logan*, Case No. CJ-2025-2575;
- *Willard v. State Farm and Rod C. Chew Ins. Agency, Inc.*, Case No. CJ-2024-7830;
- **Coover v. State Farm and Bobby Lewis Insurance Agency, Inc.*, Case No. CJ-2025-1302; and
- *Yost v. State Farm and Mike Teague*, Case No. CJ-2025-2576.

In accord with the Court's Order that the three cases at issue at the January 9 hearing—*Adair*, *Cox* and *Pruitt*—be assigned to a discovery master to deal with the Corporate Discovery motions, and for the same reasons that Plaintiffs' counsel argued for appointment of a discovery master before the *Adair* Court, the Consolidation Candidates may also, upon consolidation, be assigned to the same discovery master. Further, to maintain the efficiencies achieved through consolidation, State Farm also asks the Court to establish a procedure (explained further below) for consolidating any other Whitten Burrage cases subsequently filed in or remanded to Oklahoma County after the partial consolidation order is entered. This would apply to cases filed by Whitten Burrage that involve the same allegations as the Consolidation Candidates or seek similarly extensive Corporate Discovery.

In support of this motion, State Farm states as follows:

BACKGROUND

The above-captioned *Adair* case is the first of 22 separate cases brought by Plaintiffs' counsel that are currently pending in Oklahoma County with nearly identical Petitions,³ differing

³ The *Adair* Petition was originally filed by another plaintiffs' law firm, which later withdrew from the matter and was replaced by Whitten Burrage. For that reason, the allegations in that Petition are not identical to those in the other Consolidation Candidates. But, since Whitten Burrage first appeared in *Adair*, it has advanced this case in an identical manner to the others in which it is counsel of record. This includes propounding virtually identical written discovery in that case as the other Consolidation Candidates. As such, State Farm maintains that consolidation of *Adair*, for limited Corporate Discovery purposes described in this Motion, is appropriate. State Farm also notes that the second-lowest-numbered case among the Consolidation Candidates, *Cox*, is before Judge Dishman.

meaningfully only in a case-specific paragraph (usually ¶ 40) and some slight evolution of allegations to avoid State Farm's removals based on fraudulent joinder. While the cases are factually distinct, Plaintiffs' counsel *treat* them *identically*, serving identical, non-tailored Corporate Discovery in every case, and making identical allegations of a purported corporation-wide initiative to underpay claims.⁴ Plaintiffs' counsel uses individual policyholders' claims as a Trojan horse to advance allegations of a so-called "scheme" that—besides being a fiction—have no connection to the distinct policies, losses, properties, and claim handling histories underlying the individual claims.

Plaintiffs' counsel's gamesmanship is no more clearly demonstrated than in the procedural history of these cases. While Plaintiffs' counsel sought to consolidate only three cases already before the *Adair* Court and appoint a discovery master to oversee discovery in that limited set,⁵ Plaintiffs' counsel have also: (1) selectively pursued discovery in two later filed and remanded cases before Judge Amy Palumbo, *Hursh* and *Wong-Faust*, without seeking a discovery master (and used the resulting orders to argue that the same unlimited discovery allowed there should be permitted in all cases), (2) asked for consolidation and a discovery master in these three earlier filed cases when there was only a single discovery motion pending among the three on a different topic based on the *Adair* Court's "other obligations outside of his civil docket," (*see* Pls.' Reply at 2), while ignoring Judge Palumbo's other obligations outside of her civil docket, and (3) not meaningfully pursued or sought to compel discovery in other cases at the time their Motion was

⁴ To be clear, State Farm denies the alleged "pattern" of bad faith claims handling and intends to object to the relevance and admissibility of the claimed Corporate Discovery Plaintiffs seek regarding those allegations.

⁵ At the January 9 hearing, the *Adair* Court granted Plaintiffs' motion for appointment of a discovery master as to the *Adair*, *Cox*, and *Pruitt* matters. Should the *Adair* Court grant State Farm's motion for partial consolidation, State Farm acknowledges that order would apply to all cases consolidated pursuant to this motion.

filed.⁶ This is not a legitimate use of the litigation process. Thus, while the underlying cases are individually unique, Plaintiffs' uniform Corporate Discovery and selective pursuit of it weighs in favor of consolidating all these cases for Corporate Discovery only.

Indeed, this repeated discovery in individual cases has already harmed State Farm. Plaintiffs have recently been serving nearly identical deposition notices for corporate and fact depositions of high-ranking State Farm executives across many of these cases. The corporate deposition notices—which are facially overbroad, with over a hundred irrelevant, copied and pasted topics—will potentially require State Farm to produce a corporate designee more than twenty times for dozens or even hundreds of hours. In fact, the Court appropriately observed during the January 9 hearing that “consolidation might be useful say if you’re taking a depo of a corporate rep, right. You could cover lots of questions that would cover every case with the one corporate rep as opposed to deposing them 50 however many times, right, and asking the same questions.” (Ex. A at 23:22–24:2). Likewise, several of State Farm’s senior claims personnel, who had no connection to any of the individual claims at issue, may be subject to repeated depositions in multiple cases. And State Farm has already been forced to respond to and answer hundreds of overbroad interrogatories, requests for admission, and requests for production in these cases, when only 10 of now well over 100 of the discovery requests are claim-specific at all. The prejudice to State Farm’s business operations, legal resources, and internal processes from the

⁶ Further, at the January 9 hearing, Plaintiff’s Counsel also appeared to suggest that the *Adair* Case—which it included in its original Motion to Consolidate—was somehow “different” than its other 22 cases. (See Transcript of January 9, 2026 Hearing Before Judge Dishman, attached herein as Exhibit A, at 29:11–12 (“And *Adair*’s a little different, Your Honor.”)). While the intention behind such a statement can only be surmised, it is confounding given the case was one of three cases that Plaintiffs’ Counsel handpicked for consolidation before this Court due to its similar allegations. (See Pls.’ Mot. at 1).

indefensibly sweeping and duplicative discovery leaves State Farm little choice but to seek this tailored consolidation to deal with this nearly identical Corporate Discovery, while not also imposing all of the individual issues in each of these cases on the Court.

Consolidation of *all* of the Consolidation Candidates for limited Corporate Discovery purposes will create efficiencies for both the parties and courts. Rather than have Corporate Discovery in these cases pending before seven different judges in this County, the *Adair* Court would be enabled to oversee Corporate Discovery in all of the cases in a consistent and fair manner, with the aid of a discovery master to adjudicate discovery disputes on a global basis.

LEGAL STANDARD

“When actions involving a common question of law or fact are pending before the court, it may order a joint hearing or trial of any or all the matters in issue in the actions; it may order all the actions consolidated; and it may make such orders concerning proceedings therein as may tend to avoid unnecessary costs or delay.” 12 O.S. § 2018(C). The parties need not be identical to warrant consolidation, so long as “one or more parties” are common to all cases. L.R. 9. “[T]he judge of the division to which the lowest numbered case is assigned may consolidate and reassign all such cases to that assigned judge. Cases will be consolidated to the lowest case number.” *Id.*

Courts are granted broad discretion to consolidate for purposes of discovery. *See, e.g., Argyll Props., LLC v. Rooker*, No. CV-2017-0625, 2017 Okla. Dist. LEXIS 12772 (July 10, 2017) (consolidating “for purpose of discovery and motion practice only” and holding that “[a]t the time of pretrial, the matters shall be bifurcated”); *Quezada v. Benchmark Logistics, Inc.*, No. CJ-2012-7573, 2013 Okla. Dist. LEXIS 5083 (Oct. 1, 2013) (consolidating “for purposes of discovery”).

ARGUMENT

A. Any Consolidation Among Cases Should Not Be for Strategic Purposes, But For All Cases in Accordance with Rule 9.

As set forth in State Farm's Opposition to Plaintiffs' Motion for Appointment of Discovery Master, Plaintiffs' request that the Court cherry-pick and partially consolidate only three of the Consolidation Candidates is contrary to Local Rule 9 and does not promote judicial economy or create efficiencies for the Court or the parties. Under Rule 9, "[w]henver two or more cases involving identical issues and involving one or more parties common to all cases are pending, the judge of the division to which the lowest numbered case is assigned may consolidate and reassign *all such cases* to that assigned judge. *Cases will be consolidated to the lowest case number.*" (emphasis added). Under this unambiguous rule, each of the Consolidation Candidates should be reassigned to and consolidated before the *Adair* Court, as the Judge assigned to the lowest-numbered case.

Plaintiffs, in their motion denied by the Court at the January 9 hearing, attempted to skirt this Rule and the usual practice in Oklahoma by selectively identifying only three cases—*Adair v. State Farm*, CJ-2023-6121, *Pruitt v. State Farm*, CJ-2024-7828, and *Cox v. State Farm*, CJ-2024-7630—that they contend allege “a continuous, systematic, and broad-reaching pattern of bad faith claims.” But Plaintiffs make identical allegations in each of the Consolidation Candidates, so there is no reason to treat them differently.

To be clear, State Farm denies the alleged “pattern” of bad faith claims handling, denies that any such theories impacted any of the Consolidation Candidates, and intends to object to the relevance and admissibility of Plaintiffs' Corporate Discovery. And State Farm does not concede that the cases themselves actually involve “identical issues.” To the contrary, it is Plaintiffs' improper framing of these cases that serves as the common thread. As Plaintiffs conceded in their

Motion, “unique discovery” in each of the underlying actions is inevitable because they implicate “individual issues.” (See Pls.’ Mot. at 3–4.; Ex. A at 7:9–11 (“[P]laintiffs agree that there are individual discovery in each of these three cases . . .”). Nevertheless, State Farm seeks to mitigate the prejudice and disruption from responding to the same hundreds of discovery requests and subsequent motions to compel, the same overbroad corporate representative notices, and the same deposition notices to dozens of State Farm’s senior personnel. All of these discovery requests (which should in any event not be permitted for lack of relevance and disproportionate burden) are unnecessarily duplicative, expensive, and burdensome for the individuals, State Farm, and the Court.

Indeed, to the extent there are disputes regarding the scope of the Corporate Discovery requests, the parties in each of the Consolidation Candidates would be required to brief similar, if not identical, issues before each individual court, duplicating judicial efforts and potentially resulting in different, even contradictory orders.

Accordingly, to avoid unnecessary burdens for the parties and more efficiently use court resources, State Farm respectfully requests the Court consolidate the Consolidation Candidates *for limited Corporate Discovery purposes only*.⁷ Cf. *Blagg v. Line*, 2010 U.S. Dist. LEXIS 101140, at *5 (N.D. Okla. Sep. 23, 2010) (“Consolidation for discovery will promote judicial efficiency and eliminate duplication of discovery and motion practice by the parties. The cases will be consolidated for discovery only, and the Court will consider whether consolidation for trial is appropriate upon the completion of discovery.”). State Farm additionally requests that, once discovery has concluded, the cases be bifurcated for all pretrial and trial purposes to ensure State

⁷ To the extent discovery disputes arise related to unique, claim-specific issues, those disputes would be adjudicated by the original judge assigned to that specific individual action.

Farm can adequately and fulsomely defend each case on its individual facts. State Farm further requests the Court order that, upon conclusion of Corporate Discovery, State Farm have sixty (60) days to file a motion in each of the Consolidation Candidates challenging the relevance and/or admissibility of discovery taken in response to Corporate Discovery requests to ensure State Farm's relevance and admissibility arguments are preserved.

B. State Farm's Consolidation Proposal Satisfies the Requirements of Local Rule 9 and 12 O.S. § 2018(C).

Pursuant to 12 O.S. § 2018(C), the Court is empowered to consolidate actions "involving a *common question of law or fact*" and the Court is given discretion in crafting an appropriate consolidation framework as the statute provides that the Court, "may make such orders concerning proceedings therein as may tend to avoid unnecessary costs or delay." 12 O.S. § 2018(C) (emphasis added). Any such consolidation must also comply with Local District Court Rule 9, which states that "[w]henver two or more cases *involving identical issues* and involving one or more parties common to all cases are pending, the judge of the division to which the lowest numbered case is assigned may consolidate and reassign all such cases to that assigned judge." L.R. 9 (emphasis added).⁸ Both Local Rule 9 and 12 O.S. § 2018(C) find their basis in the inherent authority of the Court to administer its docket at its discretion. The Court may therefore use this procedural tool to craft a tailored consolidation order that specifically addresses the "common question[s]" and "identical issues" present in multiple cases.

Here, the "identical issues" are of Plaintiffs' making through the identical and expansive Corporate Discovery relating to the alleged scheme. Under this proposal, this Corporate Discovery

⁸ State Farm's commitment to following the letter of Oklahoma law on consolidation informed its decision to seek consolidation only for Whitten Burrage-filed cases in Oklahoma County. While similar cases have been brought by other plaintiffs' counsel in this and other counties, the cases brought by Whitten Burrage involve *identical* Corporate Discovery requests and allegations related to State Farm's corporate conduct, as the rules contemplate for consolidation.

would be consolidated, including discovery such as corporate representative depositions that involve allegations made across the enterprise and written discovery that covers these enterprise scheme allegations, contrasted from case-specific discovery requests and depositions of individuals such as agents or claim handlers that are unique to each individual case.

Plaintiffs' far-fetched corporate allegations and corresponding discovery create both a "common question of . . . fact"—whether, in fact, State Farm corporate engaged in a practice of underpaying claims (it did not)—and "involv[e] identical issues" arising out of that core factual contention. Each of the 22 Consolidation Candidates will implicate the examination of identical corporate designees pursuant to 12 O.S. § 3230(C)(5) (and in fact, at least four such depositions have already been noticed by Plaintiffs' counsel). And each of the Consolidation Candidates will involve identical (because of the way Plaintiffs frame them) discovery requests related to State Farm's corporate policies and practices. The *Adair* Court independently acknowledged the inherent inefficiencies in noticing corporate depositions in multiple cases at the January 9 hearing (see Ex. A at 23:22–24:2), underscoring the clear need for crafting a more efficient procedural alternative to address Plaintiffs' identical Corporate Discovery.⁹ And while consolidation of the additional 19 cases for Corporate Discovery purposes will create an additional caseload for the discovery master, the additional work imposed on this Court is likely to be minimal, since any

⁹ Cf. *Huffman v. United States Steel Corp.*, 2024 U.S. Dist. LEXIS 171637, at *26 (S.D. Ill. Sep. 23, 2024) (identifying as a justification for consolidation that plaintiff "has yet to depose a corporate representative . . . , which will likely be necessary in both cases" and that "[i]n light of the commonality between these two cases and the involvement of the exact same parties and counsel, it would be a waste of resources—especially judicial resources and the parties' resources—to proceed separately"); *Fernandez v. Aramark Unif. & Career Apparel, LLC*, 2025 U.S. Dist. LEXIS 29845, at *14 (C.D. Cal. Feb. 10, 2025) (granting motion to consolidate with procedures including "[c]oordinated written discovery" and "[a] coordinated set of Rule 30(b)(6) deposition topics and coordinated 30(b)(6) deposition(s) that can be attended by all plaintiff[s] counsel" because "it is likely that there will be duplicative discovery across the cases, which could be made more efficient for the parties and the Court through consolidation").

objections to discovery master decisions are likely to be similar across cases since his or her purview will be limited to enterprise-wide discovery. State Farm's consolidation proposal will create significant efficiencies for both the parties and the courts, who are now faced with deciding identical discovery issues in nearly two dozen different cases pending before seven different judges in this County.

C. The Court Should Also Order a Procedure to Evaluate for Consolidation Any Newly Filed or Remanded Cases.

In addition, it would promote judicial efficiencies to create a procedure for potential consolidation of any cases—newly filed in or, if removed, remanded to¹⁰ Oklahoma County—for which Plaintiffs' like allegations and discovery implicate similar issues to the Consolidation Candidates following entry of the consolidation order. These cases—like the nearly two dozen already pending in this County—when brought or joined in by Whitten Burrage will also involve many (or perhaps all) of the same discovery demands, depositions, and disputes regarding the appropriateness of Plaintiffs' extreme and overbroad discovery requests.

Thus, to ensure cases brought or joined in by Whitten Burrage asserting the same allegations or seeking the same Corporate Discovery that are filed in or remanded to Oklahoma County District Courts post-consolidation do not destroy the efficiencies gained by the requested consolidation, State Farm proposes the following procedure:

1. Within forty-five (45) days of service of a petition in this County making the same or substantially similar corporate allegations or seeking the same Corporate Discovery, or—if State Farm exercises its right to remove the case—within fifteen (15) days

¹⁰ Presently, there are several cases removed from Oklahoma County District Courts to federal court with pending motions to remand. State Farm may also remove other Oklahoma County cases to federal court, including any newly filed cases. For the avoidance of doubt, State Farm does not waive its right to remove any case to federal court.

after remand to this County of a case making the same or substantially similar corporate allegations or seeking the same Corporate Discovery, State Farm may file an Expedited Motion to Join Consolidation before this Court and a Notice of Filing such Expedited Motion in the individual action;

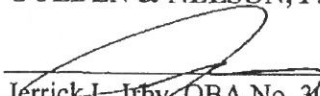
2. Plaintiffs in those newly served or remanded cases will have 10 days from filing of this Motion and Notice to file an objection in this Court;
3. Upon service of any objection, State Farm will have 10 days to file a response in support of consolidation in line with the consolidation order already before the Court.

CONCLUSION

For the foregoing reasons, State Farm respectfully requests that the Court issue an order: granting State Farm's Motion for Partial Consolidation for Corporate Discovery Purposes only pursuant to Local District Court Rule 9, of all 22 Consolidation Candidates, and creating the procedure set forth above for consolidating future cases by or with Whitten Burrage implicating similar issues that may be filed in or remanded to Oklahoma County District Courts following entry of a consolidation order.

Respectfully submitted,

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CERTIFICATE OF SERVICE

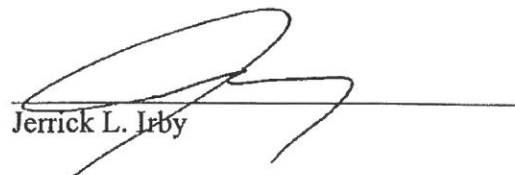
I hereby certify that on the 23rd day of January, 2026, a true and correct copy of the foregoing document was served via email and U.S. Mail, postage prepaid, to:

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