

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

STATE FARM FIRE AND CASUALTY
COMPANY and STATE FARM MUTUAL
AUTOMOBILE INSURANCE COMPANY

FORMER PLAINTIFFS

v.

CIVIL ACTION NO. 2:07cv188-DCB-MTP

JIM HOOD, IN HIS OFFICIAL CAPACITY
AS ATTORNEY GENERAL OF THE STATE
OF MISSISSIPPI

FORMER DEFENDANT

**FORMER PLAINTIFFS STATE FARM'S
CONSOLIDATED RESPONSE TO
[110] MOTION TO INTERVENE BY JACKSON NEW MEDIA, INC.,
[112] JOINDER BY WDAM, LLC,
[113] JOINDER BY WLBT, LLC AND
[114] JOINDER BY WLOX, LLC**

Former Plaintiffs State Farm Fire and Casualty Company and State Farm Mutual Automobile Insurance Company (collectively “State Farm”), submit this Consolidated Response to [110] Motion to Intervene By Jackson New Media, Inc., [112] Joinder by WDAM, LLC, [113] Joinder by WLBT, LLC and [114] Joinder by WLOX, LLC (collectively the “Motion to Intervene”).

1. As there are no changed circumstances with respect to its settlement agreement with Attorney General Hood, State Farm intends to continue fully honoring that agreement.
2. State Farm intends to continue its full compliance with this Court's Orders.
3. Due to the lack of legal citation in this Response, State Farm is not submitting a separate memorandum of authorities in support of this Response. State Farm prays that this Court will waive Miss. Unif. Dist. Ct. R. 7.2(D)'s requirement of a separate memorandum of authorities and accept this Response without necessity of a separate memorandum.

Respectfully submitted, this the 11th day of May, 2009.

STATE FARM FIRE AND CASUALTY COMPANY and STATE
FARM MUTUAL AUTOMOBILE INSURANCE COMPANY,
Plaintiffs

BY: /s/ E. Barney Robinson III
Robert C. Galloway, MB No. 4388
Jeffrey A. Walker, MB No. 6879
E. Barney Robinson III, MB No. 9432

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CERTIFICATE OF SERVICE

I, E. Barney Robinson III, one of the attorneys for the former Plaintiffs, 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 to:

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ATTORNEY FOR INTERESTED PARTYS/MOVANTS JACKSON NEW MEDIA,
INC., WDAM, LLC, WLBT, LLC AND WLOX, LLC

THIS the 11th day of May, 2009.

/s/ E. Barney Robinson III
E. Barney Robinson III (MSB #9432)