

MAY 07 2004

IN THE SUPERIOR COURT FOR THE DISTRICT OF COLUMBIA  
CIVIL DIVISION

<b>NATIONAL ASSOCIATION OF</b>	)
<b>STATE FARM AGENTS, INC.,</b>	)
	)
Plaintiff,	)
v.	)
<b>STATE FARM MUTUAL</b>	)
<b>AUTOMOBILE INSURANCE</b>	)
<b>COMPANY et al.,</b>	)
	)
Defendants.	)

Civil Action No. 02ca004089
Calendar 7
Judge Neal E. Kravitz
Next ct. event: Pretrial Conf. ADR+60 days

**DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

Pursuant to Super. Ct. Civ. R. 56, Defendants State Farm Mutual Automobile Insurance Company, State Farm General Insurance Company, State Farm Fire and Casualty Company, and State Farm Life Insurance Company (collectively, "State Farm") hereby move for summary judgment on all 19 counts of Plaintiff's Complaint. An order awarding State Farm summary judgment is warranted for the reasons set forth in the accompanying Memorandum of Law, Statement of Undisputed Facts, and the record evidence submitted therewith.

State Farm regrets burdening the Court with such lengthy materials. Defendants have made every effort to keep this filing as succinct as possible under the circumstances. However, because of the expansive scope of Plaintiff's Complaint -- which contains 19 separate Counts, targets as breaches of contract seven different State Farm practices and/or programs, and implicates the franchise laws of fifteen different jurisdictions -- it is not possible to address all of

Orig. file  
cc:MMG  
11/17

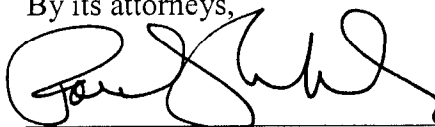
these issues, and demonstrate why summary judgment for State Farm is appropriate on all Counts, in fewer pages.

**WHEREFORE**, State Farm respectfully requests that summary judgment in Defendants' favor be granted as to each and every count of Plaintiff's Complaint.

Respectfully submitted,

**STATE FARM**

By its attorneys,

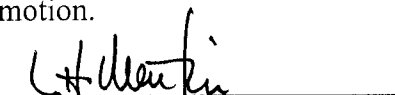


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Lawrence H. Martin, DC Bar No. 476639  
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Dated: May 6, 2004

**CERTIFICATE OF COMPLIANCE WITH SUPER. CT. CIV. R. 12-I(a)**

Pursuant to Super. Ct. Civ. R. 12-I(a), the undersigned hereby certifies that he conferred with counsel for Plaintiff concerning Defendants' Motion for Summary Judgment, and that counsel for Plaintiff did not consent to such motion.

  
Lawrence H. Martin

**CERTIFICATE OF SERVICE**

I hereby certify that on this the 6<sup>th</sup> day of May, 2004 a true and correct copy of:

1. Defendants' Motion Summary Judgment;
2. Defendants' Memorandum of Law in Support of Their Motion for Summary Judgment;
3. Defendants' Statement of Undisputed Material Facts; and
4. Affidavit of Lawrence H. Martin

were served upon the following attorneys of record for Plaintiff herein, by Federal Express:

Allan P. Hillman, Esq.  
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\_\_\_\_\_  
Lawrence H. Martin

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Plaintiff, )  
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STATE FARM MUTUAL )  
AUTOMOBILE INSURANCE )  
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Defendants. )

C.A. No. 02ca004089  
Calendar 7  
Judge Neal E. Kravitz

**ORDER GRANTING DEFENDANTS'  
MOTION FOR SUMMARY JUDGMENT**

Upon consideration of Defendants' Motion for Summary Judgment, the Court finds that there are no genuine issues of material fact in dispute, and that Defendants are entitled to judgment as a matter of law. Accordingly, it is this \_\_\_ day of \_\_\_\_\_, 2004,

**ORDERED** that the Motion is **GRANTED**. It is further

**ORDERED** that summary judgment shall be entered in Defendants' favor as to each and every count of Plaintiff's Complaint.

\_\_\_\_\_  
JUDGE NEAL E. KRAVITZ  
(Signed in Chambers)

With copies to:

Thomas M. Wood, IV, Esq.  
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