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13 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
14 COUNTY OF MENDOCINO  
15 Ukiah Branch  
16

17 STATE FARM MUTUAL AUTOMOBILE )  
INSURANCE COMPANY, STATE )  
18 FARM FIRE AND CASUALTY )  
COMPANY, STATE FARM LIFE )  
19 INSURANCE COMPANY, AND STATE )  
20 FARM GENERAL INSURANCE )  
COMPANY, )

General  
Civil No. 82819

21 Plaintiffs,

22 v.

23 JOHN W. WIER and RICHARD L.  
24 PYORRE,

25 Defendants.  
26  
27  
28

**DECLARATION OF PAUL B. DIX**

1 I, Paul B. Dix, declare:

2 1. I am a former State Farm Insurance agent. I resigned my contract in  
3 December 31, 1999 and retired from the insurance business. I have direct personal  
4 knowledge of all of the facts and circumstances set forth in this declaration and, if I were  
5 called to testify, would testify competently under oath as to these facts and circumstance.

6 2. On or about April 1, 1997, I received a letter from State Farm terminating my  
7 contract effective May 1, 1997. I requested a termination review in accordance with the  
8 terms of my contract. The review proceeding took place on or about April 7, 1997. After  
9 the review proceeding took place, the entire file was sent to Edward Rust, Jr., President  
10 of the Company, for final decision.

11 3. On or about April 24, 1997 I asked for a meeting with State Farm's Regional  
12 Vice-President for my region, Glenn Dorsett, to discuss an alternative to my termination,  
13 scheduled for May 1, 1997. I was preparing for the worst case scenario, i.e., that Mr. Rust  
14 would approve my termination. Mr. Dorsett stated that he had reviewed all the cases he  
15 had heard with Ed Rust, Jr., and he was satisfied with Mr. Rust's decisions. He said this  
16 in a friendly manner, and I took that to mean that I would be reinstated.

17 4. On or about April 28, 1997 I received a letter from Mr. Rust informing me  
18 that he had decided to rescind my termination, that Glenn Dorsett agreed with that  
19 decision, and that I should contact the executive office in Rohnert Park and request a  
20 meeting with Mr. Dorsett if I wished to continue as a State Farm agent.

21 5. On or about May 2, 1997 I attended that meeting. The purpose of this  
22 meeting was to "clear the air" and move forward together. It was expected that I would  
23 assume a leadership role and be a "good soldier" so to speak. I was admonished to be  
24 careful with whom I associated. At the time, I found that to be intimidating but looked  
25 past it in the interest of "moving forward."

