



(A Professional Association)

120 A COURTHOUSE SQUARE POST OFFICE BOX 1136 OXFORD, MISSISSIPPI 38655
(p) 662.281.1312 (f) 662.281.1312
WWW.SCRUGGSLAWFIRM.COM

RICHARD F. SCRUGGS
SIDNEY A. BACKSTROM (MS & LA)
ZACH SCRUGGS
DAVID SHELTON (MS & VI)

February 19, 2007

VIA ELECTRONIC MAIL AND U.S. MAIL

Jeffrey Jackson, Esquire
State Farm Insurance Companies
One State Farm Plaza
Bloomington, IL 61710

Sheila Birnbaum, Esquire
Skadden, Arps, Slate, Meagher & Flom
Four Times Square
New York, New York 10036

Re: Renfroe and other timely issues

Dear Jeff and Sheila:

Our disappointment in your lack of resolve in securing dismissal of the Renfroe matter cannot be overstated. Nor will it be without consequences given that its dismissal was a sine qui non to our settlement. While State Farm recently alleges “that no such promise was made,” the six of us in the room at the time, the two of you included, know better.

If State Farm’s lack of commitment and follow through on Renfroe is intended to illustrate its integrity in the proposed class settlement, our group will have no choice but to withdraw the Woullard motion. At that point we will have no further involvement except in representing the many new State Farm policyholders who have sought our help.

The Renfroe concern is not about the attorneys, who did nothing except help expose State Farm’s conduct through its captive adjusters in the most public way. If you think that we have skeletons you should bring them to light publicly. Our concern is over the Rigsbys as targets of an harassing SLAP suit that could not have happened or continued without your blessing. After all, the vast majority of Renfroe’s business is with

