

1 a. Interrogatory No. 8 in Plaintiffs' Second Set of
 2 Non-Uniform Interrogatories: State the amount of money which State
 3 Farm Mutual Automobile Insurance Company, and any of its subsidiary
 4 companies, including State Farm Fire & Casualty Company, have paid to
 5 Biodynamic Research Corporation for services from 1990 to present.

6 **RESPONSE:** Defendant State Farm Mutual Automobile
 7 Insurance Company responded previously by giving
 8 information pertaining to payment to Biodynamic
 9 Research Corporation for the state of Arizona only.
 10 Defendant supplements that answer with additional
 11 information pertaining to payment to Biodynamic
 12 Research Corporation for services nationally in the
 13 following amounts, broken down by year and by company:

<u>Year</u>	<u>Company</u>	<u>Amount</u>
1990	State Farm Mutual Automobile Ins. Co.	\$497,340.11
1990	State Farm Fire & Casualty Co.	\$ 53,023.38
1990	State Farm General Insurance Co.	\$ -0-
	Total	\$550,393.49
1991	State Farm Mutual Automobile Ins. Co.	\$1,015,228.74
1991	State Farm Fire & Casualty Co.	\$ 131,498.90
1991	State Farm General Insurance Co.	\$ 279.19
	Total	\$1,147,006.83
1992	State Farm Mutual Automobile Ins. Co.	\$1,075,879.10
1992	State Farm Fire & Casualty Co.	\$ 151,316.52
1992	State Farm General Insurance Co.	\$ 694.19
	Total	\$1,228,584.00

1	1993	State Farm Mutual Automobile Ins. Co.	\$1,227,451.28
2			
3	1993	State Farm Fire & Casualty Co.	\$ 102,772.00
4			
5	1993	State Farm General Insurance Co.	\$ <u>3,256.75</u>
6		Total	\$1,333,480.03
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8	1994	State Farm Mutual Automobile Ins. Co.	\$1,550,942.41
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10	1994	State Farm Fire & Casualty Co.	\$ 134,603.24
11			
12	1994	State Farm General Insurance Co.	\$ <u>3,791.95</u>
13		Total	\$1,689,337.60
14			
15	1995	State Farm Mutual Automobile Ins. Co.	\$1,603,921.23
16			
17	1995	State Farm Fire & Casualty Co.	\$ 114,332.10
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19	1995	State Farm General Insurance Co.	\$ <u>8,957.27</u>
20		Total	\$1,727,210.60

These totals include Arizona.

TL \$7,676,012.5

b. Request No. 4 in Plaintiffs' Second Set of Request for Production of Documents: copies of any and all documents reflecting payments by State Farm Mutual Automobile Insurance Company and any of its subsidiaries, including State Farm Fire & Casualty Co. to Biodynamic Research Corporation for the tax years 1990 through present.

RESPONSE: Defendant is producing, as Exhibit 1, a copy of the print-out reflecting payments made by State Farm Mutual Automobile Insurance Company, State Farm Fire & Casualty Company and State Farm General Insurance Company pertaining to the nation, for the tax years 1990 - 1995 (Bates Nos. SFLDR 002395-002504).

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DATED this 29th day of January, 1997.

O'CONNOR, CAVANAGH, ANDERSON,
KILLINGSWORTH & BESHEARS, P.A.

By *Ralph E. Hunsaker*

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COPY of the foregoing
hand-delivered this 29th
day of January, 1997, to:

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