

**STATE OF MINNESOTA
IN SUPREME COURT**

No. C4-97-1872; C0-97-2257

First State Insurance Company, et al.,

(Plaintiffs) Respondents,

v.

Minnesota Mining & Manufacturing Company, et al.,

(Defendants) Respondents;

**Mealey Publications, Inc., d/b/a Mealey's Litigation
Report: Breast Implants and Mealey's Litigation
Report: Insurance, and
Cowles Media Company, d/b/a Star Tribune**

(Intervenors) Petitioners.

BRIEF OF AMICUS CURIAE UNITED POLICYHOLDERS

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INTEREST OF AMICUS CURIAE

United Policyholders is a non-profit corporation dedicated to educating policyholders on their rights and duties under their insurance policies. Specifically, United Policyholders engages in charitable and educational activities by promoting greater public understanding of insurance issues and policyholder rights. United Policyholders' activities include distributing written materials and responding to requests for information from individuals, elected officials, and governmental entities.

United Policyholders has a vital interest in seeing that insurance policies are interpreted properly and consistently by insurance companies and the courts. As a public interest organization, United Policyholders seeks to assist and to educate the public and the courts on policyholders' insurance rights and to have those rights enforced consistently throughout the country.

United Policyholders was founded in 1991 as a 501(c)(3) non-profit corporation organized under the laws of the State of California, funded by donations and grants and staffed exclusively by volunteers. United Policyholders' first major project was working with over a thousand victims of a devastating October 1991 firestorm in the Oakland/Berkeley, California hills, to help them understand their policies and receive prompt, fair insurance claim settlements.

Since that time, United Policyholders has conducted educational meetings and workshops on insurance issues in Florida, Texas, and throughout California. Much of United Policyholders' work takes place in communities that have been hit by natural disasters, such as hurricanes, wildfires, earthquakes, and floods, which give rise to large numbers of insurance claims and resulting consumer confusion and frustration. United Policyholders receives frequent invitations to testify at legislative and other public hearings, and to participate in regulatory proceedings on

rate and policy issues.

Because a diverse range of residential and commercial policyholders throughout the United States communicate on a regular basis with United Policyholders regarding insurance-related concerns, United Policyholders can and does provide constructive input on insurance matters to courts throughout the United States through the filing of amicus briefs.

United Policyholders' interest in this matter relates to the importance of availability to the public of information regarding insurer practices. This interest arises from information that has been documented by insureds to United Policyholders regarding unfair advantages enjoyed by insurers in litigation.