

APPELLATE CASE NO. SC-2025-0918

IN THE SUPREME COURT OF ALABAMA

EX PARTE
STATE FARM FIRE AND CASUALTY COMPANY
Petitioner,

(IN RE: JAMES M. FOOR AND KRYSTINA FOOR V. STATE FARM
FIRE MUTUAL INSURANCE COMPANY)

ON PETITION FOR WRIT OF MANDAMUS FROM
THE CIRCUIT COURT OF BULLOCK COUNTY, ALABAMA
CIVIL ACTION NO.: CV-2025-900001

**MOTION FOR LEAVE TO FILE BRIEF OF AMICUS CURIAE
UNITED POLICYHOLDERS**

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**MOTION FOR LEAVE TO FILE AMICUS CURIAE BRIEF IN
SUPPORT OF RESPONDENTS**

United Policyholders respectfully moves this Court for permission to appear as *amicus curiae* and to submit the attached brief in support of the Respondents, James M. Foor and Krystina Foor, regarding whether the trial court abused its discretion in entering a protective order concerning State Farm’s potentially trade secret and confidential information.

INTEREST OF *AMICUS CURIAE*

United Policyholders (“UP”) is a non-profit organization founded in 1991 that serves as an information resource and a voice for insurance consumers in all 50 states. Donations, foundation grants and volunteer labor support the organization’s work, which is divided into three program areas: Roadmap to Recovery (helping disaster victims navigate the insurance claim process), Roadmap to Preparedness (promoting disaster preparedness and insurance literacy) and Advocacy and Action (advancing the interests of insurance consumers in courts of law, before regulators, legislators, and in the media). As advocate, UP has filed over 600 amicus briefs in state and federal courts nationwide, including numerous in Alabama.

There is tension between consumer expectations and the business of insurance, which must be fundamentally concerned with profits and solvency. Insurers are able to elevate their interests by controlling the terms of coverage when drafting their policies – typically standardized forms filled with terms of art not readily understood by the consumer – and determining which claims get paid. The law responds to this dynamic by placing heightened obligations on insurers in the handling of insurance claims. Discovery of, and accountability for, unfair claims practices is critical to consumer policyholders and the insurance industry as a whole. Access to such information is essential to uncovering and addressing unfair claims practices and to maintaining public confidence in the insurance system. Restrictions on discovery in this context can materially impair policyholders’ ability to vindicate their contractual and statutory rights.

United Policyholders (“UP”) has a strong interest in ensuring that courts apply discovery rules in a manner that permits accountability for insurer misconduct while preserving the balance the law strikes between insurers and insureds.

Respectfully submitted,

/s/ Ashley N. Harris
Counsel for *Amicus Curiae*
United Policyholders

CERTIFICATE OF COMPLIANCE

The undersigned certifies that this motion complies with the font and word requirements of the Alabama Rules of Appellate Procedure. This brief utilizes 14-point Century Schoolbook font and has 340 words.

/s/ Ashley N. Harris _____
Counsel for *Amicus Curiae*
United Policyholders

CERTIFICATE OF COMPLIANCE

I hereby certify that a copy of the foregoing document was electronically filed on the 19th day of February, 2026, with the Clerk of the Court, and that a copy of the same will be served upon the Circuit Court and listed counsel of record by email:

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