

**IN THE CIRCUIT COURT OF ST. LOUIS COUNTY  
STATE OF MISSOURI**

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MICHAEL PREGON, individually and  
on behalf of all others similarly situated,

Plaintiff,

v.

STATE FARM FIRE AND CASUALTY  
COMPANY,

Defendant.

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Case No. 24SL-CC03130

**MEMORANDUM OF FILING**

Plaintiff, Michael Pregon, through his counsel, files the Supplemental Declaration of Jameson Olsen Regarding Settlement Administration, a copy of which is attached to this Memorandum of Filing.

Date: March 2, 2026

*/s/Christopher E. Roberts*

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Christopher E. Roberts #61895

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*Class Counsel*

**CERTIFICATE OF SERVICE**

I hereby certify that on March 2, 2026, a copy of the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all counsel of record.

/s/ Christopher E. Roberts

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ST. LOUIS COUNTY, MISSOURI**

MICHAEL PREGON, individually, and  
on behalf of all others similarly situated,

Plaintiff,

vs.

STATE FARM FIRE AND CASUALTY  
COMPANY,

Defendant.

Case No. 24SL-CC03130

**SUPPLEMENTAL DECLARATION  
OF JAMESON OLSEN REGARDING  
SETTLEMENT ADMINISTRATION**

**SUPPLEMENTAL DECLARATION OF JAMESON OLSEN REGARDING  
SETTLEMENT ADMINISTRATION**

I, JAMESON OLSEN, declare and state as follows:

1. I am a Project Manager at JND Class Action Administration (“JND”). JND is a legal administration services provider with its headquarters located in Seattle, Washington. JND has extensive experience with all aspects of legal administration and has administered settlements in hundreds of class action cases. This Declaration is based on my personal knowledge, as well as upon information provided to me by experienced JND employees, and if called upon to do so, I could and would testify competently thereto.

2. JND is serving as the Administrator in the above-captioned litigation (“Action”) for the purposes of administering the Stipulation and Settlement Agreement Among Plaintiff Michael Pregon, Individually and on Behalf of a Settlement Class, and Defendant State Farm Fire and Casualty Company (“Settlement Agreement”), preliminarily approved by the Court in its October 10, 2025, Order Granting Motion for

1 Preliminary Approval of Class Action Settlement, Preliminarily Certifying Settlement  
2 Class, Directing Class Notice, and Scheduling a Final Approval Hearing (“Order”).

3 3. This Declaration is being filed as a supplement to the report on settlement  
4 administration executed February 20, 2026.

5 **OBJECTIONS**


6 4. The Notice informed recipients that any potential Settlement Class  
7 Members who would like to object to the Settlement may do so by filing a written  
8 objection with the Court (and mailing a timely postmarked copy of the written objection  
9 to the Administrator) by January 30, 2026.

10 5. As of February 20, 2026, JND had not received any objections and was not  
11 aware of any objections.

12 6. On Saturday, February 21, 2026, JND received one objection to the  
13 settlement by email from Patrick A. Seamands. A copy is attached as **Exhibit A**.

14  
15 I declare under the penalty of perjury pursuant to the laws of the United States of  
16 America that the foregoing is true and correct.

17  
18 Executed on February 27, 2026, at Seattle, Washington.

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22 JAMESON OLSEN  
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# EXHIBIT A

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**Patrick Seamands - Objection To Settlement - Pregon v. State Farm Fire and Casualty Co., Case No. 24SL-CC03130**

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**From** [REDACTED]  
**Date** Sat 2/21/2026 11:35 AM  
**To** info@pregon-v-statefarm.com <info@pregon-v-statefarm.com>

 1 attachment (276 KB)  
2026-02-21 Pregon-v State Farm Settlement Signed Letter Of Objection .pdf;

My objections to the settlement are attached.

Thanks,

Patrick A. Seamands  
[REDACTED]

**PATRICK AARON SEAMANDS, M.B.A., D.E., P.E.**

February 21, 2026

Pregon v. State Farm Settlement  
c/o JDN Legal Administration  
P.O. Box 91215  
Seattle, WA 98111

Re: Pregon v. State Farm Fire and Casualty Co., Case No. 24SL-CC03130

To Whom It Might Concern:

I object to the settlement. I feel that State Farm has reasonably managed my claims.

With the Christmas and New Year's holidays intervening, the notice did not allow potential claimants to review the notice of a potential settlement.

The notice does not include enough information for a potential claimant to determine whether they were adversely affected by State Farm's alleged practices or what the financial effect of the settlement would be on them.

The settlement unnecessarily puts the responsibility of searching through records from potentially over ten years ago to file a claim. The parties to the settlement, Pregon And State Farm, should have records on who filed claims and the details of the claims. That information should be provided to potential claimants along with each claimant's potential settlement amount so that each claimant can make an informed decision about whether to participate in the settlement.

Sincerely,



Patrick A. Seamands