

IN THE CHANCERY COURT FOR THE STATE OF TENNESSEE
TWENTIETH JUDICIAL DISTRICT, DAVIDSON COUNTY

STATE OF TENNESSEE
ex rel. HODGEN MAINDA,
COMMISSIONER OF COMMERCE AND
INSURANCE FOR THE STATE OF
TENNESSEE

No. 03-293 (IV)

Petitioner

v.

AMERICAN NATIONAL LAWYERS
INSURANCE RECIPROCAL (RISK
RETENTION GROUP), a Tennessee
Domiciled Insurance Company

Defendants

MOTION OF LIQUIDATOR OF AMERICAN NATIONAL LAWYERS INSURANCE
RECIPROCAL (RRG) (IN LIQUIDATION) TO APPROVE
PLAN FOR CLOSURE OF LIQUIDATION ESTATE

Hodgen Mainda, Commissioner of the Tennessee Department of Commerce and Insurance as Liquidator of American National Lawyers Insurance Reciprocal (RRG) in Liquidation, by and through his Special Deputy Receiver, moves the Court to approve the plan for closure of the American National Lawyers Insurance Reciprocal's ("ANLIR") Liquidation Estate. Attached as **Exhibit 1** to this Motion is the plan for closure of the ANLIR Liquidation Estate as well as those of its sister companies in liquidation: Doctors Insurance Reciprocal (RRG) (in Liquidation) ("DIR") and The Reciprocal Alliance (RRG)(in Liquidation)("TRA").

As set forth in **Exhibit 1**, the plan for closure of the ANLIR Liquidation Estate is orderly and reasonable. It addresses the final receipt of assets owed to the ANLIR Liquidation Estate and the final actions needed regarding expense reserves, disposition

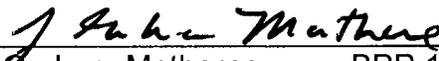
of funds, tax filings, further interim court filings, disposition of unclaimed funds, document destruction and final court filings including filings that will (a) close the ANLIR Liquidation Estate, (b) close these proceedings and (c) discharge the Liquidator and his Special Deputy Receiver.

Notice of this Motion and its **Exhibit 1** will be provided to the Tennessee Attorney General's Office and the ANLIR Liquidator, through his appointed Special Deputy Receiver, will post a copy of this Motion on the Tennessee Department of Commerce and Insurance website (<https://www.tn.gov/commerce/insurance/company-resources/insurance-company-actions.html>).

This Motion seeks relief that needs to be relied upon in advancing the progression of the ANLIR Liquidation Proceedings toward closure. But the relief afforded through granting this Motion does not address all matters at issue in the ANLIR Liquidation Proceedings. In order to provide certainty with regard to the relief granted, the ANLIR Special Deputy Receiver requests that the Court expressly find that there exists no just reason for delay and that the Order granting this Motion be entered as final regarding the matters addressed in that Order. Rule 54.02 Tenn. R. Civ. P.

Accordingly, the ANLIR Liquidator, by and through his Special Deputy Receiver, moves the Court to approve the plan of closure for the ANLIR Liquidation Estate as set forth in **Exhibit 1**.

Respectfully submitted,



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*Counsel for Jeanne B. Bryant, Special Deputy
Receiver for American National Lawyers
Insurance Reciprocal (RRG) (In Liquidation)*

NOTICE OF HEARING

THIS MOTION IS SET TO BE HEARD ON FRIDAY, JULY 24, 2020 AT 9:00 A.M. (CENTRAL TIME) IN THE COURTROOM FOR THE CHANCERY COURT OF DAVIDSON COUNTY, TENNESSEE (PART IV) LOCATED AT THE METRO COURTHOUSE IN NASHVILLE, TENNESSEE. ANY RESPONSE IN OPPOSITION IS TO BE FILED WITH THE COURT AND SERVED ON ABOVE-NOTED COUNSEL ON OR BEFORE MONDAY, JULY 20, 2020. IF NO RESPONSE IS TIMELY FILED AND SERVED, THE MOTION CAN BE GRANTED WITHOUT FURTHER NOTICE.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing has been delivered by e-mail transmission and U.S. Mail, First Class postage prepaid, to the following on this 8th day of July, 2020:

Sarah A. Hiestand, Senior Counsel
Office of the Attorney General
State of Tennessee
Post Office Box 20207
Nashville, TN 37202-0207
Sarah.Hiestand@ag.tn.gov

I further certify that a copy of this Motion was posted on the Tennessee Department of Commerce and Insurance website (<https://www.tn.gov/commerce/insurance/company-resources/insurance-company-actions.html>) on this the 8th day of July, 2020.

J. Rich Mathew
Counsel to the ANLIR Special Deputy Receiver