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7 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
8 **FOR THE COUNTY OF LOS ANGELES**

9 RICARDO LARA, Insurance Commissioner of
10 the State of California,

11 Applicant,

12 vs.

13 MISSION INSURANCE COMPANY, a
California corporation, et al

14 Respondent.

15 Consolidated with Case Numbers

16 C 576 324; C 576 416;
17 C 576 323; C 576 325; C 629709

Case No. C 572 724

Honorable Teresa A. Beaudet

**NOTICE OF FIRST AMENDED MOTION
AND FIRST AMENDED MOTION TO
EXTEND MISSION INSURANCE
COMPANY TRUST, MISSION
NATIONAL INSURANCE COMPANY
TRUST AND ENTERPRISE INSURANCE
COMPANY TRUST MEMORANDUM OF
POINTS AND AUTHORITIES;
DECLARATION OF SCOTT PEARCE**

**October 3 2022
Time: 10:00 a.m.
Department 50**

Action Filed: October 31, 1985

RESERVATION ID: 492092421437

25 Ricardo Lara, Insurance Commissioner of the State of California, in his capacity as
26 Trustee of the Mission Insurance Company Trust, the Mission National Insurance Company

27 NOTICE OF FIRST AMENDED MOTION AND FIRST AMENDED MOTION TO EXTEND MISSION
INSURANCE COMPANY TRUST, MISSION NATIONAL INSURANCE COMPANY TRUST AND
28 ENTERPRISE INSURANCE COMPANY TRUST MEMORANDUM OF POINTS AND AUTHORITIES;
DECLARATION OF SCOTT PEARCE - 1

1 Trust, and the Enterprise Insurance Company Trust, respectfully gives notice that on October 3,
2 2022, at the hour of 10:00 a.m., or as soon thereafter as the matter may be heard. This first
3 amended motion corrects a typographic error in the conclusion of the points and authorities. The
4 Insurance Commissioner of the State of California, as Trustee of the Mission Insurance
5 Company Trust, the Mission National Insurance Company Trust, and the Enterprise Insurance
6 Company Trust will move the Court for an order to extend the Mission Insurance Company
7 Trust, the Mission National Insurance Company Trust, and the Enterprise Insurance Company
8 Trust. The motion will request to extend the term of the trusts through December 31, 2024 from
9 its current date of December 31, 2022. The hearing will be held in Department 50 of the Los
10 Angeles Superior Court, 111 North Hill Street, Los Angeles, CA 90012.

11 The motion is supported by the Declaration of Scott Pearce. The motion requests that the
12 Court authorize the extension of the Trusts, and all other just and equitable relief.

13 Wherefore, premises considered, the Trustee requests that the Court issue its order
14 authorizing extension of Mission Insurance Company Trust, Mission National Insurance
15 Company Trust and Enterprise Insurance Company Trust through December 31, 2024, and all
16 other just and equitable relief.

17
18
19 Respectfully submitted,
20 WISENER NUNNALLY ROTH &
21 HIGGINS, LLP

22
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Attorneys for Insurance Commissioner as
Trustee

1 This Court entered its Closing Order for the eventual wind-up of these trusts, but the
2 trusts remain open to collect assets and make distributions. The Trusts have substantial
3 receivables from other companies in receiverships, which receivables may generate substantial
4 further recoveries. [Pearce Declaration page 9, line 20 through page 10, line 16].
5

6 **Progress since December 2020**

7 Since the Court granted the last extension motion to extend the Trusts' life from
8 December 31, 2020 through December 31, 2022, the Trustee reports the current status of
9 wrapping up the three remaining asset collection matters. The Insurance Commissioner
10 completed distribution in late 2020 of the following distributions:
11

12 \$ 38,358,301.49 to general creditors of Mission Insurance Company Trust with claims
13 over \$ 10,000, bringing their distribution percentage up to 78.92%;

14 \$3,630,354.50 to the three affiliate creditors of Enterprise Insurance Company Trust,
15 bring their distribution percentage up to 65.61%;

16 \$ 7,484,651.46 to approved policyholder class claimants of Mission National Insurance
17 Company Trust, bringing their distribution percentage on their interest claims to 66.85%.

18 Two other receivables may also generate assets for further distribution. Holland-America
19 Insurance Company Trust, a sister company of the Mission Companies' Trusts in receivership in
20 Missouri, owes Mission Insurance Company Trust a substantial sum on a general creditor proof
21 of claim. While Holland-America Insurance Company Trust has paid its policyholder claims, it
22 is in the process of seeking its release from the United States.
23
24

25 Although Mission Insurance Company Trust, Mission National Insurance Company Trust
26 and Enterprise Insurance Company Trust obtained their releases some years ago, the Holland-

1 America Insurance Company Trust continues to address its federal release issues with the United
2 States. The Mission Companies' Trusts will need to stay open because this asset is unlikely to be
3 collected in 2022. The extent of the potential collection on this asset, if any, will depend on the
4 resolution by the Missouri receiver regarding matters of its federal claim issues, if any, with the
5 United States. Since the last status conference in this matter, the undersigned counsel has been in
6 regular communication with counsel for the Missouri Receiver. The Missouri Receiver is taking
7 steps to seek to resolve the issues, but has not yet reached a resolution with the United States.
8

9 Universale Ruckversicherungs (Univeersale), a Swiss reinsurer in receivership, also owes
10 money to Mission Insurance Company Trust, Mission National Insurance Company Trust and
11 the Enterprise Insurance Company Trust. The estate has assets, but has been in the process of
12 seeking to liquidate them for distribution. On June 3, 2022, the Universale Ruck Bankrutpcy
13 Receivership issued a status update to creditors. Prior to that status update, the Universale Ruck
14 bankruptcy estate had paid out 71.% to approved proof of claim creditors. The report projected
15 that Universale Ruck will ultimately make a distribution to bring its approved claims distribution
16 up to around 90%. However, that same report projects that the next update will not occur until
17 the third quarter of 2023. The Universale asset appears unlikely to be recovered in 2022. A
18 further distribution from the Universale bankruptcy would increase the estates of each of the
19 three trusts. The situation with both of these collections is set forth in the Pearce Declaration,
20 page 9, line 19 through page 10, line 16.
21
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23

24 One somewhat smaller matter appears nearer resolution. Mission Insurance Company
25 Trust contends that it is the death beneficiary of an annuity with a \$ 200,000 death benefit. An
26 issue arose about whether competing claims exist to this death benefit. Substantial progress has
27

1 been made on this resolving this matter. If the progress continues, the Insurance Commissioner
2 intends to present a motion to approve settlement of this asset issue.

3 This motion seeks an order extending the Trusts to complete these collections and permit further
4 distributions. The Trustee hopes that this process will be completed in 2023 or 2024. However,
5 to ensure that adequate time is allowed to ensure that the trusts can meet their tasks, the motion
6 asks to extend the trusts through 2024.
7

8 **Argument and Authorities:**

9 California Insurance Code Section 1037 grants the Insurance Commissioner as Liquidator
10 broad powers over the administration of insolvent insurance company estates. That section
11 provides the Insurance Commissioner as liquidator with the authority to do acts as are “necessary
12 or expedient to collect, conserve” and “protect” the assets of the insurer. Section 1037 concludes
13 with a statement of broad general powers on the part of the Insurance Commissioner. California
14 Insurance Code Section 1020 authorizes this Court to make such orders as may be required to
15 prevent interference with the proceedings. *In re Executive Life Ins. Co.*, (1995) 32 Cal. App. 4th
16 344, 38 Cal. Rptr. 2d 453.
17
18


19 The Insurance Commissioner as Trustee seeks to complete the wind-up, but the trusts
20 should stay in existence until their assets are collected and distributed. The Insurance
21 Commissioner as Trustee hopes to complete that process in 2022 or 2023, but requests to extend
22 the trusts to 2024 to avoid having to come back for a further extension in 2024.
23

24 **Conclusion:**

25 The Insurance Commissioner as Trustee requests an extension of the trusts, as further
26 asset substantial collections are likely to occur after year-2022. The Court is respectfully

1 requested to grant this motion, and extend the trusts to December 31, 2024.

2
3 Respectfully submitted,
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27 Attorneys for Insurance Commissioner as
28 Trustee

1
2 Declaration of Scott Pearce

3 I, Scott Pearce, hereby declare the following facts to be true and correct

- 4
5 1. I am the Senior Estate Trust Officer with the California Insurance Commissioner's
6 Conservation and Liquidation Office (CLO). I have personal knowledge of the facts to
7 which I attest, which I acquired in my day-to-day role working for the CLO in connection
8 with the Mission Insurance Company Trust, the Mission National Insurance Company
9 Trust and the Enterprise Insurance Company Trust (The Mission Companies' Trusts). If
10 called upon to testify as a witness, I could and would testify as set forth in this
11 Declaration.
12
- 13 2. In my role as Senior Estate Trust Officer, I have primary responsibility for matters
14 pertaining to the administration of the Mission Companies' Trusts.
15
- 16 3. Based upon review of this Court's orders, I attest that Mission Insurance Company,
17 Mission National Insurance Company and Enterprise Insurance Company ("The Mission
18 Companies"), three substantial property and casualty insurance companies, entered
19 conservation proceedings on October 31, 1985. They entered liquidation proceedings on
20 February 24, 1987. As part of the process of administering these liquidation estates, their
21 assets were transferred by order of this Court to the Mission Insurance Company Trust,
22 the Mission National Insurance Company Trust, and the Enterprise Insurance Company
23 Trust (the "Mission Companies' Trusts").
24
- 25 4. The proof of claim bar date expired in September 1987. The adjustment of proofs of
26 claims has been completed, and all proofs of claim determined. The Mission Companies'

1 Trusts liquidations resulted in substantial distributions to policyholders and creditors.
2 Each approved policyholder priority creditor of each of the Mission Companies has
3 received all the principal amount of its claim, and in the case of Mission National
4 Insurance Company Trust, a substantial interest payment. Each general creditor of
5 Mission National Insurance Company Trust has received one hundred percent of the
6 approved principal amount of its claim, and the general creditors of Mission Insurance
7 Company Trust and Enterprise Insurance Company Trust have received substantial but
8 not one hundred percent distributions on their general creditor claims.

9
10 5. I am aware that this Court previously granted a Closing Order for the eventual wind-up of
11 these trusts, but the trusts remain open to collect assets and make distributions. The
12 Trusts have substantial receivables from other companies in receiverships, which
13 receivables are expected to generate substantial further recoveries.

14
15 6. Since the Court granted the last extension motion to extend the Trusts' life from
16 December 31, 2020 through December 31, 2022, the Trustee completed a substantial
17 distribution to creditors of each of the three trusts as approved by the Court in 2020.

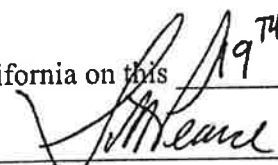
18
19 7. I am advised by the reinsurance department that two other receivables may also generate
20 assets for further distribution. Holland-America Insurance Company Trust, a sister
21 company of the Mission Companies' Trusts in receivership in Missouri, owes Mission
22 Insurance Company Trust a substantial sum on a general creditor proof of claim. While
23 Holland-America Insurance Company Trust has paid its policyholder claims, it is in the
24 process of seeking its release from the United States. I am advised that while the
25 Missouri Receiver continues to seek a release from the United States, the discussion
26

1 process continues. Mission Insurance Company is by far the most substantial approved
2 general creditor of Holland-America Insurance Company Trust. The Mission Companies'
3 Trusts will need to stay open until this asset is either collected, or until the Trustee learns
4 that no distribution will be made on this asset. The extent of the potential collection on
5 this asset, if any, will depend on the resolution by the Missouri receiver regarding matters
6 of its federal claim issues, if any, with the United States.
7

8 8. I am advised by the CLO reinsurance department that Universale Ruckversicherungs, a
9 Swiss reinsurer in receivership, also owes money to Mission Insurance Company Trust.
10 While partial distributions have been made from that receivership in the past, further
11 distributions appear likely to occur, but after 2022. This is another reason to keep the
12 trusts in operation, so that these assets can be collected and distributed. Finally a
13 structured settlement beneficiary dispute may result in a smaller recovery in 2022 or
14 2023. The estate should stay open for this reason as well.
15
16
17

18 I hereby declare the foregoing facts to be true and correct under penalty of perjury of the laws of
19 the State of California.

20 Signed at San Francisco, California on this 19TH day of August 2022.

21 
22 _____
23 Scott Pearce

PROOF OF SERVICE: By REGULAR MAIL
(Code Civ. Proc., ' ' 1013, 2015.5)

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STATE OF TEXAS, COUNTY OF DALLAS.

I am employed in the County of Dallas, State of Texas. I am over the age of 18 and not a party to the within action; my business address is 245 Cedar Sage Drive, Suite 240, Garland, Texas 75040.

On this date, I served the foregoing document described as **NOTICE OF FIRST AMENDED MOTION AND FIRST AMENDED MOTION TO EXTEND MISSION INSURANCE COMPANY TRUST, MISSION NATIONAL INSURANCE COMPANY TRUST AND ENTERPRISE INSURANCE COMPANY TRUST MEMORANDUM OF POINTS AND AUTHORITIES; DECLARATION OF SCOTT PEARCE** by placing a copy thereof enclosed in sealed envelopes addressed as follows:

Sent via FIRST CLASS MAIL to:


The Attached List

I am readily familiar with my employer's practices of collection and processing correspondence for mailing with the U.S. Postal Service and the above-referenced correspondence will be deposited with the U.S. Postal Service on the same date as stated below, following the ordinary course of business.

(State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

(Federal) I declare that I am employed by the office of a member of the bar of this court at whose direction the service was made.

Executed on August 29, 2022 at Garland, Texas.



Glynis Malone

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6 Attorneys for Insurance Commissioner as Trustee

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8 **FOR THE COUNTY OF LOS ANGELES**

9 RICARDO LARA, Insurance Commissioner of
the State of California,

10 Applicant,

11 vs.

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13 California corporation, et al

14 Respondent.

15 Consolidated with Case Numbers

16 C 576 324; C 576 416;
17 C 576 323; C 576 325; C 629709

Case No. C 572 724

Honorable Teresa A. Beaudet

[PROPOSED]

**ORDER GRANTING FIRST AMENDED
MOTION TO EXTEND MISSION
INSURANCE COMPANY TRUST,
MISSION NATIONAL INSURANCE
COMPANY TRUST AND ENTERPRISE
INSURANCE COMPANY TRUST**

**October 3, 2022
Time: 10:00 a.m.
Department 50**

Action Filed: October 31, 1985

RESERVATION ID: 492092421437

23
24 On the 3rd day of October, 2022, this Court heard the Motion to Extend Mission
25 Insurance Company Trust, Mission National Insurance Company Trust and Enterprise Insurance
26 Company Trust filed by the Insurance Commissioner as Trustee.

27
28 **ORDER GRANTING FIRST AMENDED MOTION TO EXTEND MISSION INSURANCE COMPANY TRUST,
MISSION NATIONAL INSURANCE COMPANY TRUST AND ENTERPRISE INSURANCE COMPANY
TRUST - 1**

1 The Court considered the pleadings, the motion papers on file, and the supporting
2 evidence, as well as any timely filed opposition and supporting evidence, if any.

3 The Court GRANTS the motion. The Court authorizes that the Mission
4 Insurance Company Trust, the Mission National Insurance Company Trust and the Enterprise
5 Insurance Company Trust shall remain in existence until at least December 31, 2024.
6

7 So Ordered.

8 Signed this _____ day of October 2022.

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10 _____
11 Judge of the Superior Court
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PROOF OF SERVICE: By REGULAR MAIL
(Code Civ. Proc., ' ' 1013, 2015.5)

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STATE OF TEXAS, COUNTY OF DALLAS.

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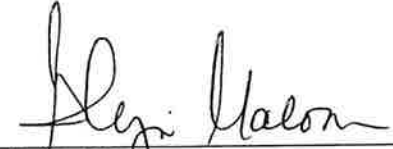
On this date, I served the foregoing document described as **ORDER GRANTING FIRST AMENDED MOTION TO EXTEND MISSION INSURANCE COMPANY TRUST, MISSION NATIONAL INSURANCE COMPANY TRUST AND ENTERPRISE INSURANCE COMPANY TRUST** by placing a copy thereof enclosed in sealed envelopes addressed as follows:

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(State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.
 (Federal) I declare that I am employed by the office of a member of the bar of this court at whose direction the service was made.

Executed on August 29, 2022 at Garland, Texas.



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