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AUG 10 2020 RCUD

9 Attorneys for Insurance Commissioner as Trustee

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **FOR THE COUNTY OF LOS ANGELES**

12 RICARDO LARA, INSURANCE
13 COMMISSIONER OF THE STATE OF
14 CALIFORNIA,

15 Applicant,

16 vs.

17 MISSION INSURANCE COMPANY, A
18 CALIFORNIA CORPORATION, ET
19 AL

20 Respondent.

Case No.: C 572 724

Honorable Teresa A. Beaudet

**NOTICE OF MOTION AND
INSURANCE COMMISSIONER'S
MOTION TO AUTHORIZE
DISTRIBUTIONS;
MEMORANDUM OF POINTS AND
AUTHORITIES; DECLARATION
OF RAYMOND J. MINEHAN**

September 18, 2020

Time: 8:30 a.m.

Department 50

Reservation ID: 139443066910

21 _____
22 Consolidated with Case Numbers
23 C 576 324; C 576 416;
24 C 576 323; C 576 325; C 629709

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28 NOTICE OF MOTION AND INSURANCE COMMISSIONER'S MOTION TO AUTHORIZE DISTRIBUTIONS;
MEMORANDUM OF POINTS AND AUTHORITIES; DECLARATION OF RAYMOND J. MINEHAN - 1

1 Ricardo Lara, Insurance Commissioner of the State of California, in his
2 capacity as Trustee of the Mission Insurance Company Trust, the Mission National
3 Insurance Company Trust, and the Enterprise Insurance Company Trust
4
5 (collectively, the "Mission Trusts"), respectfully submits this Notice of Motion and
6 Motion seeking to Authorize Distributions. This motion will seek court
7
8 authorization to make a series of distributions from Mission Insurance Company
9 Trust, Mission National Insurance Company Trust and Enterprise Insurance
10 Company Trust to certain of its creditors holding approved proofs of claims.
11

12 Since the last previous distribution in 2017, the Insurance Commissioner as
13 Trustee has collected substantial assets, including in particular a substantial
14 distribution as to an approved proof of claim as to Centaur Insurance Company, an
15 Illinois insurer in receivership. This motion now seeks to distribute substantial
16 sums to the claimants with approved proof of claims against the Mission Trusts.
17
18

19 The proposed distribution is contemplated to take place in a series of steps,
20 because in some cases, one of the Mission trusts will receive a distribution, and
21 then itself be in a position to make a further or greater distribution to its approved
22 claimants.
23

24 The first distribution will be made from Mission Insurance Company Trust.
25
26 In the past, this trust has paid the principal amount of all policyholder claims, and
27 has paid or made a final distribution, with this Court's approval, as to all claims of
28

1 general creditors holding approved proofs of claims of less than \$ 10,000. In the
2 past, Mission Insurance Company Trust had also paid 70 % of all claims of
3 approved general creditor proof of claim holders with approved claims of \$ 10,000
4 or more.
5

6 The Insurance Commissioner proposes to make this first distribution from
7 Mission Insurance Company Trust to bring the distribution percentage for general
8 creditors owed \$ 10,000 or more up from 70% to 78.92% This is projected to
9 involve the distribution of \$ 38,358,301.49.
10
11

12 The second distribution will be made by Enterprise Insurance Company
13 Trust. This trust will have received a distribution from Mission Insurance
14 Company Trust in the first distribution. Enterprise Insurance Company Trust has
15 three creditors: Holland-America Insurance Company Trust, Mission National
16 Insurance Company Trust, and Mission Reinsurance Corporation Trust. Enterprise
17 Insurance Company Trust will distribute the sum of a projected \$ 3,630,354.50
18 according to the proportion of the debt owed to each of its three affiliate creditors,
19 which are:
20
21
22

23 Holland-America Insurance Company Trust

24 Mission National Insurance Company Trust; and

25 Mission Reinsurance Corporation Trust.
26
27

1 Prior distributions to these general creditors have been 55.40%, but shall
2 increase through this distribution to 65.61%

3 The third distribution will be made by Mission National Insurance Company
4 Trust. This trust has previously, with court approval, paid one hundred percent of
5 the principal amount of all approved proofs of claim. Mission National Insurance
6 Company Trust has further paid through past court-approved distributions forty-
7 eight (48%) of the interest on policyholder claims previously approved by the
8 Court.
9
10

11 In the third distribution, Mission National Insurance Company Trust will
12 increase the distribution of interest for approved policyholder class claimants from
13 Sixty-three percent (63%) to sixty-six and 85/100 percent (66.85 %) distributing a
14 projected total of \$ 7,484,651.46.
15
16

17 The motion will be supported by the Declaration of Raymond J. Minehan,
18 the pleadings and papers on file, and the accompanying memorandum of points
19 and authorities. Some claimants have made claims assignments in the past. In
20 addition, some firms may purchase further claims. In order to ensure an orderly
21 handling of any claims assignments, the Insurance Commissioner as Trustee
22 further will request that the "record date" for any assignees to submit their
23 assignments shall be August 31, 2020. By August 31, 2020, any notices of
24 assignment must be received from any assignees. If no assignment is received by
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1 August 31, 2017, then payment shall be made to the claimant reflected in the
2 Insurance Commissioner's records. This provision will help ensure that the
3 payees upon distribution are handled in an orderly fashion. Of course, an assignee
4 can still hypothetically later contract with an assignor to purchase a claim. But if
5 the assignee does so, but does not get the assignment on file with the CLO by
6 August 31, then the distribution will be made to the claimant of record (in this
7 example, the assignor) and the assignee who failed to file the assignment must
8 make arrangements directly with its assignor for transfer of the payment.
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12 In addition to the service list for these liquidations, a copy of this motion
13 will be sent to the approved claimants who will, if this motion is granted, receive
14 distributions. In addition, this notice of motion will be posted on the Conservation
15 and Liquidation Office website, www.cacllo.org .
16

17 Wherefore, premises considered, the Insurance Commissioner as Trustee
18 respectfully requests that this Court:
19

- 20 A. Authorize the distributions set forth in the Motion to Approve Distributions;
- 21 B. Authorize the Insurance Commissioner to take reasonably all steps necessary
22 to effectuate the distributions;
- 23 C. Approve the record date by which assignees must file their assignments at
24 August 31, 2020; and
- 25 D. All other just and equitable relief.
26
27

1 Dated this 4th day of August, 2020.

2
3 Respectfully submitted,

4
5 _____
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28 Attorneys for Insurance Commissioner

1 **Memorandum of Points and Authorities**

2 **Introduction and the Distributions Proposed**

3
4 This motion arises in the insolvency proceedings of three California property
5 and casualty insurance companies. This motion seeks permission to make a series
6 of distributions to enable each of the liquidating trusts created to handle the
7
8 liquidation of these insurance companies to make distributions to approved
9 creditors. Mission Insurance Company, Mission National Insurance Company and
10 Enterprise Insurance Company are California property and casualty insurance
11 companies that entered liquidation on February 24, 1987. The Insurance
12 Commissioner as Trustee of Mission Insurance Company Trust, Mission National
13 Insurance Company Trust and Enterprise Insurance Company Trust administrates
14
15 their remaining assets and distributions of approved claims. Over one billion
16
17 dollars in assets have been collected by the liquidating trusts, of which most of the
18
19 assets collected were previously distributed to approved claimants.

20 The claims against the three trusts have been resolved and fixed. The three
21
22 trusts operate under closing orders, under which they gather assets from companies
23 that owe them funds. On June 22, 2017, Mission Insurance Company Trust and
24
25 Mission National Insurance Company Trust obtained this Court's approval to settle
26
27 a substantial claim of the United States government for a fraction of the claim.

28 Enterprise Insurance Company Trust had earlier obtained a federal release

1 agreement without the necessity for payment. These federal releases permit the
2 Insurance Commissioner as Trustee to move this Court for permission to distribute
3 substantial assets being held until the United States issues could be resolved.
4

5 California Insurance Code Section 1033 sets the priorities for distribution.
6 In this case, the proofs of claims have been evaluated, and substantial distributions
7 have already been made.
8

9 In the past, Mission Insurance Company Trust has paid the approved
10 principal amount of all of its approved policyholder-class proofs of claims, and
11 paid seventy percent of the principal amount of the general creditor claims
12 approved against Mission Insurance Company Trust. Following the settlement with
13 the United States as to alleged super-priority claims, the Insurance Commissioner
14 as Trustee is in a position to make a substantial distribution to approved general
15 creditor class creditors of Mission Insurance Company Trust. This motion seeks
16 authorization for this distribution, to bring the general creditor distribution from
17 70% up to 78.92%.
18
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22 The Mission Insurance Company Trust distribution contemplated will
23 generate recoveries for Mission National Insurance Company Trust and for
24 Enterprise Insurance Company Trust. After receiving the distribution from
25 Mission Insurance Company Trust, Enterprise Insurance Company Trust, which
26 has few other assets, will be in a position to make a further distribution to its
27

1 remaining creditors, who are all affiliate companies. In the past, Enterprise
2 Insurance Company Trust has resolved all creditor claims (with court approval)
3 except inter-company claims. Enterprise Insurance Company Trust seeks leave to
4 increase its distribution percentage 65.61% to its affiliate creditors. The second
5 phase of the distribution will be the distribution from Enterprise Insurance
6 Company Trust to its approved remaining general creditor proof of claim holders.
7
8

9 Mission National Insurance Company Trust has assets ready for distribution,
10 and will in addition receive distributions from Mission Insurance Company Trust
11 and from Enterprise Insurance Company Trust in the first two phases of its
12 distribution. Mission National Insurance Company Trust has previously distributed
13 to all creditors the principal amount of their claims. This Court issued an order on
14 October 3, 2008 that determined the total amount of interest due to policyholder
15 class claimants against Mission National Insurance Company Trust. [Request for
16 Judicial Notice, Exhibit "A"]. Further, Mission National Insurance Company Trust
17 previously distributed 63% of the interest due to its policyholder class (California
18 Insurance Code Section 1033, Class 5 when this insolvency began, now realigned
19 to California Insurance Code Section 1033, Class 2). [Request for Judicial Notice,
20 Exhibit B]. The Insurance Commissioner as Trustee seeks permission to increase
21 the distribution of interest to holders of approved policyholder-class claims against
22 Mission National Insurance Company Trust to increase the distribution from sixty-
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1 three percent (63%) of the approved policyholder interest to sixty six and 85/100
2 percent (66.85%).

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4 **II. The Insurance Commissioner's Request to make a Distribution is**
5 **Reviewed for Abuse of Discretion**

6 This motion proposes to do what insurance company liquidations are
7 designed to do—to make distributions to approved proof of claim holders. This
8 2020 motion seeks permission to distribute substantial funds recovered since the
9 2017 distribution approved by this Court.

10
11
12 This motion to approve further distributions invokes the Insurance
13 Commissioner's powers under California Insurance Code Section 1037. California
14 Insurance Code Section 1037 gives the Insurance Commissioner as Liquidator
15 substantial authority to administer the business of the liquidation.
16

17
18 The purpose of a liquidation is to marshal the assets for payment to
19 creditors. The Insurance Commissioner is appointed liquidator in order to
20 administer the affairs of an insolvent insurer for the benefit of policyholders,
21 general creditors and the public. *Garris v. Carpenter* (1939) 33 Cal. App. 2d 649,
22 654-655.
23

24
25 In this case, the Insurance Commissioner as Trustee has paid one hundred
26 percent of the principal amount of claims of policyholder-class claimants against
27 Mission Insurance Company Trust, Mission National Insurance Company Trust

1 and Enterprise Insurance Company Trust, and one hundred percent of the principal
2 amount of all claims against Mission National Insurance Company Trust. This
3 distribution will permit further payments to be made to the approved general
4 creditors of Mission Insurance Company Trust and Enterprise Insurance Company
5 Trust, and permit a further payment of interest to approved claimants against
6 Mission National Insurance Company Trust.
7
8

9 In administering an insurance company insolvency, the Insurance
10 Commissioner is entitled to deference. The Court should adopt the Insurance
11 Commissioner's recommendation unless it is an arbitrary, improperly
12 discriminatory or a violation of the statutes. *In re Executive Life Insurance*
13 *Company* (1995) 32 Cal. App.4th 344, 358.
14
15

16 The Insurance Commissioner files with this motion the Declaration of
17 Raymond J. Minehan. Mr. Minehan is the Chief Financial Officer of the
18 Conservation and Liquidation Office. He has over twenty years' experience in
19 preparing financial statements. His declaration provides factual detail about the
20 past distributions, the availability of assets to make the requested distributions, and
21 an explanation of the reasons why the distributions proposed shall occur in three
22 phases. The distributions will proceed first from Mission Insurance Company
23 Trust to its creditors. Enterprise Insurance Company Trust is one of the creditors of
24 Mission Insurance Company Trust. Upon receipt of its distribution, Enterprise
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1 Insurance Company Trust will be in a position to make a distribution to its
2 creditors, which are all sister companies. This is the requested second phase of the
3 distribution, to occur just after the initial distribution.
4

5 Mission National Insurance Company Trust will receive funds from Mission
6 Insurance Company Trust in the first phase of the distribution and from Enterprise
7 Insurance Company Trust in the second phase of the distribution. Mr. Minehan
8 explains in his declaration that Mission National Insurance Company Trust will be
9 able to make its own distribution of additional interest to policyholder-class
10 claimants with approved proofs of claims against Mission National Insurance
11 Company Trust.
12
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15 The net impact of this distribution will be the transfer of over thirty-nine
16 million dollars to creditors of Mission Insurance Company Trust and Mission
17 National Insurance Company Trust.
18

19 The trusts have some additional receivables that may be collected in the
20 future. One is a receivable owed by Holland-America Insurance Company Trust, a
21 Missouri receivership. One is a receivable owed by Universale Ruckversicherungs,
22 (Universale Ruck) a Swiss company in receivership. The receivership assets that
23 would otherwise be available to pay in part the Holland-America Insurance
24 Company Trust receivable may (or may not) be reduced (or, in the worst case,
25 eliminated) by United States EPA claims against those entities. The Trustee is
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2 This Court is respectfully requested to approve this distribution.
3

4 Respectfully submitted,
5 

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8 State Bar Number 134151

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1 **Declaration of Raymond J. Minehan**

2 I, Raymond J. Minehan, make this declaration in San Francisco County,
3 California and declare under penalty of perjury that the following facts are true and
4 correct:
5

6 1. I am Raymond J. Minehan. I am over the age of eighteen years. I am
7 competent to be a witness. I have personal knowledge of the facts to which I
8 attest. I acquired my personal knowledge in my role as Chief Financial
9 Officer of the Conservation and Liquidation Office (“CFO”). I have over
10 forty years’ experience in the preparation of financial documents and
11 balance sheets. If called upon to testify about these facts, I could and would
12 do so.
13
14
15

16 2. I make this Declaration to support a motion to make a series of distributions
17 to creditors of Mission Insurance Company Trust, Enterprise Insurance
18 Company Trust and Mission National Insurance Company Trust. I oversee
19 the regular financial statement preparation and financial matters pertinent to
20 these trusts.
21
22

23 3. I attach as Exhibit “A” and incorporate herein by reference a true and correct
24 copy of the June 30, 2020 balance sheet for Mission Insurance Company
25 Trust and for Mission National Insurance Company Trust. I believe that
26 Exhibit A provides a useful depiction of the assets available to Mission
27

1 Insurance Company Trust and Mission National Insurance Company Trust
2 for distribution. In light of the assets on hand at Mission Insurance
3 Company Trust and Mission National Insurance Company Trust, I
4 recommend that this Court approve a series of three distributions from
5 Mission Insurance Company Trust, Enterprise Insurance Company Trust and
6 Mission National Insurance Company Trust. I recommend that these
7 distributions take place in a sequence in order that the payment of inter-
8 company balances will permit more distribution to third party creditors.
9

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11
12 4. Mission Insurance Company Trust has previously paid one hundred percent
13 of the principal amount of the approved proofs of claims to policyholder-
14 level priority creditors. With court approval, Mission Insurance Company
15 Trust made final distributions to approved proof of claim payments with
16 general creditor claims less than \$ 10,000. With court approval, Mission
17 Insurance Company Trust previously has paid 70% of the approved proof of
18 claim amount to approved general creditor priority creditors with claims of
19 \$ 10,000 or more. I recommend that the Insurance Commissioner as Trustee
20 make a further distribution to raise the distribution percentage for general
21 creditors with claims of \$ 10,000 or more to 78.92%. The trust has the
22 assets necessary to make this distribution. The estimated distribution
23 amount is \$ 38,358,301.49.
24
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1 5. Once Mission Insurance Company Trust has made its distribution, then
2 Enterprise Insurance Company Trust will receive assets that will permit it to
3 make a distribution to its creditors. At this point, all of its creditors except
4 affiliate creditors have been dealt with through distributions pursuant to
5 prior orders of this Court. I recommend that Enterprise Insurance distribute
6 all the funds it receives from Mission Insurance Company Trust to its
7 creditors, resulting in an increase of its distributions to 65.61%. The
8 estimated distribution amount is \$ 3,630,354.50.

9
10
11
12 6. Under this recommendation, Mission National Insurance Company Trust
13 would receive assets from Mission Insurance Company Trust in its
14 distribution, and from Enterprise Insurance Company Trust in its
15 distribution. In addition, Mission National Insurance Company Trust has
16 additional cash assets available for distribution. In the past, pursuant to
17 orders of the Court, it has paid the principal of all approved claims, and paid
18 63% of the interest previously calculated as due to policyholder-priority
19 creditors of Mission National Insurance Company Trust. I recommend that
20 the interest distribution from Mission National Insurance Company Trust be
21 increased from 63 % to 66.85 %. The estimated distribution amount of this
22 distribution would total \$ 7,484,651.46.

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27 7. The liquid assets of the trusts permit the distributions requested. There are

1 some uncollected assets that may generate, but are not guaranteed to
2 generate, further recoveries for distribution. The effect of these distributions
3 will be to distribute most of the cash and liquid assets on hand of the trusts,
4 while maintain a substantial reserve to permit wind-up and a final
5 distribution of the trusts. I believe that these distributions are appropriate
6 and recommend them. I hereby declare the foregoing facts to be true and
7 correct under the penalty of perjury of the laws of the State of California on
8 this 4 day of August, 2020.
9

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13 Raymond J. Minehan
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Exhibit A

CONSOLIDATED: Mission Ins Cos
STATEMENT OF ASSETS AND LIABILITIES
As of June 30, 2020

	672	170	
	Mission	Mission National	TOTAL
ASSETS			
Participation in pooled investments, at market	\$ 41,611,700	\$ 8,310,900	\$ 49,922,500
Accrued investment income	114,700	22,900	137,600
Recoverable from reinsurers	2,032,400	1,958,500	3,990,900
Receivable from affiliates	23,816,400	-	23,816,400
Total Available Assets	67,575,200	10,292,300	77,867,400
LIABILITIES			
Secured claims	1,137,300	1,258,100	2,395,400
Accrued administrative expenses	-	-	-
Claims against policies, including guaranty associations, before distributions	846,832,600	596,098,500	1,442,931,000
Early access and other Class 2 distributions	(846,832,600)	(528,997,900)	(1,375,830,500)
Payable to affiliates	80,154,800	36,075,900	116,230,800
All other claims	33,695,300	(19,237,800)	14,457,400
Total Estimated Liabilities	114,987,400	85,196,800	200,184,100
NET ASSETS (DEFICIENCY)	\$ (47,412,200)	\$ (74,904,500)	\$ (122,316,700)



Journal Technologies Court Portal

Court Reservation Receipt

Reservation

Reservation ID:
139443066910

Status:
RESERVED

Reservation Type:
Motion for Order (Approving Distribution)

Number of Motions:
1

Case Number:
C572724

Case Title:
CHARLES QUACKENBUSH VS. MISSION
INSURANCE COMPANY

Filing Party:
Ins Commissioner of The State of Calif (Legacy Party)

Location:
Stanley Mosk Courthouse - Department 50

Date/Time:
September 18th 2020, 8:30AM

Confirmation Code:
CR-UTKT2EYGQEP8ACTUI

Fees

Description	Fee	Qty	Amount
Motion for Order (name extension) *** Fees Exempted by Gov Code 6103.1 ***	60.00	1	0.00
TOTAL			\$0.00

Payment

Amount:
\$0.00

Type:
GOVT_EXEMPT

[← Back to Main](#)

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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.

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 MOTION AND INSURANCE COMMISSIONER'S MOTION TO AUTHORIZE DISTRIBUTIONS; MEMORANDUM OF POINTS AND AUTHORITIES; DECLARATION OF RAYMOND J. MINEHAN** 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 5th, 2020 at Garland, Texas.



Braedon Jones

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Attorneys for Insurance Commissioner as Trustee

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

10 **FOR THE COUNTY OF LOS ANGELES**

11 RICARDO LARA, Insurance Commissioner of
12 the State of California,

Applicant,

13 vs.

14 MISSION INSURANCE COMPANY, a
California corporation, et al

15 Respondent.

Case No. C 572 724

Honorable Teresa A. Beaudet

**[PROPOSED] ORDER GRANTING
MOTION TO APPROVE
DISTRIBUTIONS**

September 18, 2020 at 8:30 a.m.

Department: 50

111 North Hill St., Floor 5 Room 508
Los Angeles, CA 90012

Filed: October 31, 1985

RESERVATION ID: 139443066910

18 Consolidated with Case Numbers

19 C 576 324; C 576 416;
20 C 576 323; C 576 325; C 629709
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28 **ORDER GRANTING MOTION TO APPROVE DISTRIBUTIONS**

1 On this day this Court considered the Motion to Authorize Distributions filed by the
2 Insurance Commissioner as Trustee. The Court considered the motion, the evidence filed in
3 support of the motion, and any timely opposition, evidence in opposition and replies. The Court
4 also considered the pleadings and papers on file, and any argument of counsel.

5 The Court GRANTS the motion. The Court orders that:

- 6 A. The Insurance Commissioner as Trustee is authorized to make the distributions to
7 approved Mission Insurance Company Trust general creditor priority proof of claim
8 holders owed \$ 10,000 or more to bring the distribution percentage for those creditors
9 up from 70% to 78.92%.
- 10 B. The Insurance Commissioner as Trustee is authorized to make distributions to the
11 affiliate companies who are the remaining approved general creditor priority proof of
12 claim holders against Enterprise Insurance Company Trust to bring the distribution
13 percentage to those affiliate creditors up to 65.61% of their approved claims.
- 14 C. The Insurance Commissioner as Trustee is authorized to make distributions to the
15 approved policyholder priority proofs of claims against Mission National Insurance
16 Company Trust to increase the interest distribution percentage from 63% up to
17 66.85%.
- 18 D. The Insurance Commissioner as Trustee may take such other steps as are reasonably
19 required to effectuate the distributions.

20 SO ORDERED.

21
22 Signed this _____ day of September, 2020.

23
24 _____
25 Judge of the Superior Court

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 **[PROPOSED] ORDER GRANTING MOTION TO APPROVE DISTRIBUTIONS** 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 5, 2020 at Garland, Texas.



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