

COPY

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ORIGINAL FILED
Superior Court Of California
County Of Los Angeles

AUG 11 2017

Sherri R. Carter, Executive Officer/Clerk
By: Marlon Gomez, Deputy

Attorneys for Insurance Commissioner as Trustee

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

DAVE JONES, INSURANCE
COMMISSIONER OF THE STATE OF
CALIFORNIA,

Applicant,

vs.

MISSION INSURANCE COMPANY, A
CALIFORNIA CORPORATION, ET
AL

Respondent.

Case No.: C 572 724

Honorable Teresa A. Beaudet

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

September 29, 2017

Time: 8:30 a.m.

Department 50

Reservation ID: 161222183325

Consolidated with Case Numbers
C 576 324; C 576 416;
C 576 323; C 576 325; C 629709

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

BY FAX

1 Dave Jones, 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 respectfully submits this Notice of Motion and Motion seeking to Authorize
5 Distributions from the Mission Insurance Company Trust. This motion will seek
6 court authorization to make a series of distributions from Mission Insurance
7 Company Trust, Mission National Insurance Company Trust and Enterprise
8 Insurance Company Trust to certain of its creditors holding approved proofs of
9 claims.
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13 The proposed distribution is contemplated to take place in a series of steps,
14 because in some cases, one of the Mission trusts will receive a distribution, and
15 then itself be in a position to make a further or greater distribution to its approved
16 claimants.
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18

19 The first distribution will be made from Mission Insurance Company Trust.
20 In the past, this trust has paid the principal amount of all policyholder claims, and
21 has paid or made a final distribution, with this Court's approval, as to all claims of
22 general creditors holding approved proofs of claims of less than \$ 10,000. In the
23 past, Mission Insurance Company Trust had also paid 50% of all claims of
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1 approved general creditor proof of claim holders with approved claims of \$ 10,000
2 or more.

3 The Insurance Commissioner proposes to make this first distribution from
4 Mission Insurance Company Trust to bring the distribution percentage for general
5 creditors owed \$ 10,000 or more up from 50% to 70%. This is projected to involve
6 the distribution of \$ 86,018,935.80.
7

8
9 The second distribution will be made by Enterprise Insurance Company
10 Trust. This trust will have received a distribution of a projected \$ 8,041,160.80
11 from Mission Insurance Company Trust in the first distribution. Enterprise
12 Insurance Company Trust has three creditors: Holland-America Insurance
13 Company Trust, Mission National Insurance Company Trust, and Mission
14 Reinsurance Corporation Trust. Enterprise Insurance Company Trust will
15 distribute the sum of a projected \$ 8,042,295.76 according to the proportion of the
16 debt owed to each of its creditors, which are set forth as follows:
17
18

19 To Holland-America Insurance Company Trust: \$ 2,407,657.26
20

21 To Mission National Insurance Company Trust: \$ 4,538,804.63.
22

23 To Mission Reinsurance Corporation Trust: \$ 1,095,833.87.
24

25 The third distribution will be made by Mission National Insurance Company
26 Trust. This trust has previously, with court approval, paid one hundred percent of
27

1 the principal amount of all approved proofs of claim. Mission National Insurance
2 Company Trust has further paid through past court-approved distributions forty-
3 eight (48%) of the interest approved on policyholder claims by the court.
4

5 In the third distribution, Mission National Insurance Company Trust will increase
6 the distribution of interest for approved policyholder class claimants from
7
8 forty-eight percent (48%) to sixty three percent (63.0%), distributing a projected
9 total of \$ 29,145,241.98

10 The motion will be supported by the Declaration of Raymond J. Minehan,
11
12 the pleadings and papers on file, and the accompanying memorandum of points
13 and authorities. Some claimants have made claims assignments in the past. In
14
15 addition, some firms may purchase further claims. In order to ensure an orderly
16 handling of any claims assignments, the Insurance Commissioner as Trustee
17 further will request that the "record date" for any assignees to submit their
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19 assignments shall be August 21, 2017. By August 21, 2017, any notices of
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21 assignment must be received from any assignees. If no assignment is received by
22
23 August 21, 2017, then payment shall be made to the claimant reflected in the
24
25 Insurance Commissioner's records. This provision will help ensure that the
26
27 payees upon distribution are handled in an orderly fashion. Of course, an assignee
28 can still hypothetically later contract with an assignor to purchase a claim. But if

1 the assignee does so, but does not get the assignment on file with the CLO by
2 August 21, then the distribution will be made to the claimant of record (in this
3 example, the assignor) and the assignee who failed to file the assignment must
4 make arrangements directly with its assignor for transfer of the payment.
5

6 In addition to the service list for these liquidations, a copy of this motion
7 will be sent to the approved claimants who will, if this motion is granted, receive
8 distributions. In addition, this notice of motion will be posted on the Conservation
9 and Liquidation Office website, www.caclo.org .
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12 Wherefore, premises considered, the Insurance Commissioner as Trustee
13 respectfully requests that this Court:
14

- 15 A. Authorize the distributions set forth in the Motion to Approve Distributions;
- 16 B. Authorize the Insurance Commissioner to take reasonably all steps necessary
17 to effectuate the distributions;
- 18 C. Approve the record date by which assignees must file their assignments at
19 August 21, 2017; and
- 20 D. All other just and equitable relief.
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7 Dated this 11TH day of August, 2017.
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10 Respectfully submitted,
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12 ROBERT H. NUNNALLY, JR.

13 Robert@wnrlaw.com

14 State Bar Number 134151

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Memorandum of Points and Authorities

Introduction and the Distributions Proposed

This motion arises in the insolvency proceedings of three California property and casualty insurance companies. This motion seeks permission to make a series of distributions to enable each of the liquidating trusts created to handle the liquidation of these insurance companies to make distributions to approved creditors. Mission Insurance Company, Mission National Insurance Company and Enterprise Insurance Company are California property and casualty insurance companies that entered liquidation on February 24, 1987. The Insurance Commissioner as Trustee of Mission Insurance Company Trust, Mission National Insurance Company Trust and Enterprise Insurance Company Trust administers their remaining assets and distributions of approved claims. Over one billion dollars in assets have been collected by the liquidating trusts, of which most of the assets collected were previously distributed to approved claimants.

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

1 Enterprise Insurance Company Trust had earlier obtained a federal release
2 agreement without the necessity for payment. These federal releases permit the
3 Insurance Commissioner as Trustee to move this Court for permission to distribute
4 substantial assets being held until the United States issues could be resolved.
5

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

10 In the past, Mission Insurance Company Trust has paid the approved
11 principal amount of all of its approved policyholder-class proofs of claims, and
12 paid fifty percent of the principal amount of the general creditor claims approved
13 against Mission Insurance Company Trust. Following the settlement with the
14 United States as to alleged super-priority claims, the Insurance Commissioner as
15 Trustee is in a position to make a substantial distribution to approved general
16 creditor class creditors of Mission Insurance Company Trust. This motion seeks
17 authorization for this distribution, to bring the general creditor distribution from
18 50% up to 70%.
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23 The Mission Insurance Company Trust distribution contemplated will
24 generate recoveries for Mission National Insurance Company Trust and for
25 Enterprise Insurance Company Trust. After receiving the distribution from
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1 Mission Insurance Company Trust, Enterprise Insurance Company Trust will be in
2 a position to make a further distribution to its remaining creditors, who are all
3 affiliate companies. In the past, Enterprise Insurance Company Trust has resolved
4 all creditor claims (with court approval) except inter-company claims. Enterprise
5 Insurance Company Trust seeks leave to increase its distribution percentage 56.1%
6 to its affiliate creditors. The second phase of the distribution will be the
7 distribution from Enterprise Insurance Company Trust to its approved remaining
8 general creditor proof of claim holders.

9
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11
12 Mission National Insurance Company Trust has assets ready for distribution,
13 and will in addition receive distributions from Mission Insurance Company Trust
14 and from Enterprise Insurance Company Trust in the first two phases of its
15 distribution. Mission National Insurance Company Trust has previously distributed
16 to all creditors the principal amount of their claims. This Court issued an order on
17 October 3, 2008 that determined the total amount of interest due to policyholder
18 class claimants against Mission National Insurance Company Trust. [Request for
19 Judicial Notice, Exhibit "A"]. Further, Mission National Insurance Company Trust
20 previously distributed 48% of the interest due to its policyholder class (California
21 Insurance Code Section 1033, Class 5 when this insolvency began, now realigned
22 to California Insurance Code Section 1033, Class 2). [Request for Judicial Notice,
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1 Exhibit B]. The Insurance Commissioner as Trustee seeks permission to increase
2 the distribution of interest to holders of approved policyholder-class claims against
3 Mission National Insurance Company Trust to increase the distribution from forty-
4 eight (48%) of the approved policyholder interest to 63 %.

6 **II. The Insurance Commissioner's Request to make a Distribution is**
7
8 **Reviewed for Abuse of Discretion**

9 Mission Insurance Company Trust has made distributions of fifty cents on
10 the dollar to approved general creditor proof of claim holders, after previously
11 having paid the principal of policy-holder class approved proofs of claims against
12 Mission Insurance Company Trust.

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

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

24 In this case, the Insurance Commissioner as Trustee has paid one hundred percent
25

1 of the principal amount of claims of policyholder-class claimants against Mission
2 Insurance Company Trust, Mission National Insurance Company Trust and
3 Enterprise Insurance Company Trust. The Insurance Commissioner as Trustee of
4 Mission Insurance Company Trust, having compromised a super-priority claim of
5 the United States, is now in a positon to make distribution of a substantial majority
6 of its assets to pay general creditor claims against Mission Insurance Company
7 Trust.
8

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

16
17 The Insurance Commissioner files with this motion the Declaration of
18 Raymond J. Minehan. Mr. Minehan is the Chief Financial Officer of the
19 Conservation and Liquidation Office. He has over twenty years' experience in
20 preparing financial statements. His declaration provides factual detail about the
21 past distributions, the availability of assets to make the requested distributions, and
22 an explanation of the reasons why the distributions proposed shall occur in three
23 phases. The distributions will proceed first from Mission Insurance Company
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1 Trust to its creditors. Enterprise Insurance Company Trust is one of the creditors of
2 Mission Insurance Company Trust. Upon receipt of its distribution, Enterprise
3 Insurance Company Trust will be in a position to make a distribution to its
4 creditors, which are all sister companies. This is the requested second phase of the
5 distribution, to occur just after the initial distribution.
6

7
8 Mission National Insurance Company Trust will receive funds from Mission
9 Insurance Company Trust in the first phase of the distribution and from Enterprise
10 Insurance Company Trust in the second phase of the distribution. Mr. Minehan
11 explains in his declaration that Mission National Insurance Company Trust will be
12 able to make its own distribution of additional interest to policyholder-class
13 claimants with approved proofs of claims against Mission National Insurance
14 Company Trust.
15
16

17 The net impact of this distribution will be the transfer of over one hundred
18 fifteen million dollars to creditors of Mission Insurance Company Trust and
19 Mission National Insurance Company Trust.
20
21

22 The trusts have some additional receivables that may be collected in the
23 future. One is a receivable owed by Holland-America Insurance Company Trust.
24 Another is a receivable owed by Centaur Insurance Company, an Illinois insurer in
25 rehabilitation. The receivership assets that would otherwise be available to pay in
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1 part each of those two receivables may (or may not) be reduced (or, in the worst
2 case, eliminated) by United States EPA claims against those entities. The Trustee
3 is hopeful that recoveries will be made on those proof of claims, but recovery is
4 not certain. A third receivable is an approved proof of claim from Universale Ruck,
5 a Swiss reinsurer in liquidation. Universale Ruck has paid substantial past
6 distributions, and is expected eventually to pay additional distributions. Other
7 approved claims and minor matters may ,but are not guaranteed to, provide further,
8 smaller recoveries.

9 The approval of this distribution will move these trusts closer to their
10 eventual closure, and ensure that creditors get additional payments on their claims.
11 The Court is respectfully to approve this motion and permit a distribution to
12 approved creditors as requested. The trusts will retain assets sufficient to complete
13 the administration of their further asset collections and distributions.

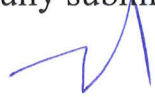
14 Conclusion

15 The Insurance Commissioner as Trustee seeks this Court's permission to pay
16 additional sums to creditors of Mission Insurance Company Trust, Mission
17 National Insurance Company Trust and Enterprise Insurance Company Trust.
18 This repayment of creditors is a key goal of any receivership, and the Insurance

1 Commissioner is well within his discretion to seek to make this distribution.

2 This Court is respectfully requested to approve this distribution.

3
4 Respectfully submitted,



5
6 ROBERT H. NUNNALLY, JR.

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15 Attorneys for Insurance Commissioner
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1
2 **Declaration of Raymond J. Minehan**

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

- 7
8 1. I am Raymond J. Minehan. I am over the age of eighteen years. I am
9 competent to be a witness. I have personal knowledge of the facts to which I
10 attest. I acquired my personal knowledge in my role as Chief Financial
11 Officer of the Conservation and Liquidation Office (“CFO”). I have over
12 twenty years’ experience in the preparation of financial documents and
13 balance sheets. If called upon to testify about these facts, I could and
14 would do so.
15
16
17 2. I make this Declaration to support a motion to make a series of distributions
18 to creditors of Mission Insurance Company Trust, Enterprise Insurance
19 Company Trust and Mission National Insurance Company Trust. I oversee
20 the regular financial statement preparation and financial matters pertinent to
21 these trusts.
22
23
24 3. I attach as Exhibit “A” and incorporate herein by reference a true and correct
25 copy of the June 30, 2017 balance sheet for Mission Insurance Company
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27

1 Trust and for Mission National Insurance Company Trust. I believe that
2 Exhibit A provides a useful depiction of the assets available to Mission
3 Insurance Company Trust and Mission National Insurance Company Trust
4 for distribution. In light of the assets on hand at Mission Insurance
5 Company Trust and Mission National Insurance Company Trust, I
6 recommend that this Court approve a series of three distributions from
7 Mission Insurance Company Trust, Enterprise Insurance Company Trust and
8 Mission National Insurance Company Trust. I recommend that these
9 distributions take place in a sequence in order that the payment of inter-
10 company balances will permit more distribution to third party creditors.
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14

- 15 4. Mission Insurance Company Trust has previously paid one hundred percent
16 of the principal amount of the approved proofs of claims to policyholder-
17 level priority creditors. With court approval, Mission Insurance Company
18 Trust made final distributions to approved proof of claim payments with
19 general creditor claims less than \$ 10,000. With court approval, Mission
20 Insurance Company Trust previously has paid fifty percent of the approved
21 proof of claim amount to approved general creditor priority creditors with
22 claims of \$ 10,000 or more. I recommend that the Insurance Commissioner
23 as Trustee make a further distribution to raise the distribution percentage for
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1 general creditors with claims of \$ 10,000 or more from 50% to 70%. The
2 trust has the assets necessary to make this distribution.

3
4 5. Once Mission Insurance Company Trust has made its distribution, then
5 Enterprise Insurance Company Trust will receive assets to make a
6 distribution to its creditors. At this point, all of its creditors except affiliate
7 creditors have been dealt with through distributions pursuant to prior orders
8 of this Court. I recommend that Enterprise Insurance distribute all the funds
9 it receives from Mission Insurance Company Trust to its creditors, resulting
10 in an increase of its distributions to 56.1%.
11

12
13 6. Under this recommendation, Mission National Insurance Company Trust
14 would receive assets from Mission Insurance Company Trust in its
15 distribution, and from Enterprise Insurance Company Trust in its distribution.
16 In addition, Mission National Insurance Company Trust has additional cash
17 assets available for distribution. In the past, pursuant to orders of the Court,
18 it has paid the principal of all approved claims, and paid 48% of the interest
19 previously calculated as due to policyholder-priority creditors of Mission
20 National Insurance Company Trust. I recommend that the interest
21 distribution from Mission National Insurance Company Trust be increased
22 from 48 % to 63 %.
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1 7. The liquid assets of the trusts permit the distributions requested. There are
2 some uncollected assets that may generate, but are not guaranteed to
3 generate, further recoveries for distribution. The effect of these distributions
4 will be to distribute most of the cash and liquid assets on hand of the trusts.
5 I believe that these distributions are appropriate and recommend them. I
6 project the cash amount of each distribution shall be:
7

8 Phase 1, the Mission Insurance Company Trust distribution: \$ 86,018,935.80

9 Phase 2, the Enterprise Insurance Company Trust distribution:
10

11 \$ 8,042,295.76
12

13 Phase 3, the Mission National Insurance Company Trust distribution:
14

15 \$ 29,145,241.98.
16

17 I hereby declare the foregoing facts to be true and correct under the penalty
18 of perjury of the laws of the State of California on this _10_ day of
19 August, 2017.

20 
21 Raymond J. Minehan
22

CONSOLIDATED: Mission Ins Cos
STATEMENT OF ASSETS AND LIABILITIES
As of June 30, 2017

	672 Mission	170 Mission National	TOTAL
ASSETS			
Participation in pooled investments, at market	113,412,900	33,758,000	147,170,900
Accrued investment income	358,200	106,600	464,800
Recoverable from reinsurers	20,788,400	2,610,000	23,398,400
Receivable from affiliates	23,816,400	-	23,816,400
Total Available Assets	158,375,900	36,474,600	194,850,500
LIABILITIES			
Secured claims	24,923,300	6,736,800	31,660,000
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)	(499,851,900)	(1,334,569,100)
California and Federal claims having preference	-	-	(39,700)
Payable to affiliates	78,724,300	36,075,900	114,800,200
All other claims	119,714,200	(19,237,800)	88,400,800
Total Estimated Liabilities	223,361,800	119,821,500	343,183,200
NET ASSETS (DEFICIENCY)	(64,985,900)	(83,346,900)	(148,332,700)
ASSETS detail			
Cash and Investments			
12001 Participation in Pooled Investment	113,412,915	33,757,957	147,170,872
Cash and Investments	113,412,915	33,757,957	147,170,872
13015 Accrued Int & Div Receivable	358,182	106,593	464,775
Reinsurance Receivable			
13001 Rein Recoverable-Paid	41,473,730	5,083,148	46,556,878
13003 Allow For Uncoll Rein Receivable	(20,685,291)	(2,473,196)	(23,158,487)
Reinsurance Receivable	20,788,439	2,609,953	23,398,392
Receivable from affiliates			
13012.EIC Receivable from Enterprise	-	13,487,859	13,487,859
13012.HAIC Receivable from Holland America	39,649,980	-	39,649,980
13012.1 Allowance for Receivable from Affiliates	(15,833,536)	(13,487,859)	(29,321,395)
Receivable from Affiliates Net of Allowance	23,816,444	-	23,816,444
Total Available Assets	158,375,980	36,474,503	194,850,483
LIABILITIES detail			
Secured Claims			
21005 Other Secured Liabilities	23,750,000	4,850,000	28,600,000
22001 Unclaimed Funds Payable	1,173,252	1,886,786	3,060,037
Secured Claims	24,923,252	6,736,786	31,660,037
Class 1: Payables and Accrued Expenses			
25001 Due To/From Intercompany Acct	1	1	2
Class 1 Liabilities	1	1	2
Class 2: Losses, Reserves and non-IGA Claims			
28001 Loss & ALAE Reserve	-	110,872,815	110,872,815
28008 Liability Due to GAS	661,199,259	284,717,623	945,916,882
29001 Other Class 2 Payable	185,633,302	200,508,039	386,141,341
Class 2 Liabilities before Distributions	846,832,561	596,098,477	1,442,931,038
Early Access and Other Class 2 Distributions			
28007 Advances to Guaranty Associations	(661,199,259)	(337,936,554)	(999,135,813)
41005 Class 2 Distributions	(177,960,427)	(159,300,375)	(457,834,216)
41012 Distributions on Behalf of Domiciliary	(7,672,875)	(2,614,935)	(10,287,810)
Early access and other Class 2 distributions	(846,832,560)	(499,851,864)	(1,334,569,141)
Class 3, 5 & 6: Calif and Federal claims			
27003 Premium Tax Payable - Class 3	111,132	-	111,132
41002 Class 3-6 Distributions	(111,132)	-	(150,813)
Class 3, 5 & 6 Liabilities	-	-	(39,680)
Class 7: Payable to Affiliates			
30002.MIC Payable to Mission	-	22,778,042	22,778,042
30002.MNIC Payable to Mission National	21,729,091	-	21,729,091
30002.EIC Payable to Enterprise	40,205,805	-	40,205,805
30002.HAIC Payable to Holland America	11,543,166	-	11,543,166
30002.MRC Payable to Mission Re	5,246,200	-	5,246,200
30002.INT Interest Payable to Affiliates	-	13,297,901	13,297,901
Class 7 Payable to Affiliates	78,724,251	36,075,943	114,800,193
Class 7: All Other Claims			
30001 Accounts Payable-Pre Liquidation	-	-	-
30005 Reinsurance Payable	383,122,808	5,396,962	388,519,771
30008 Other Class 7 Liabilities	2,255,708	2,442,517	4,698,225
41006 Class 7 Distributions	(265,664,289)	(27,077,326)	(304,817,218)
Class 7 Liabilities	119,714,227	(19,237,847)	88,400,777
Total Estimated Liabilities	223,361,731	119,821,495	343,183,226
NET ASSETS (DEFICIENCY)	(64,985,751)	(83,346,993)	(148,332,743)

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

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 THE 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.

 X (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 11, 2017 at Garland, Texas.



Braedon Jones

New York Liquidation Bureau
Attn: Mission - Nicholas L. Cremonese
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New York, New York 10038-3889

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