

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. 03-294 (IV)

Petitioner

v.

DOCTORS INSURANCE RECIPROCAL
(RISK RETENTION GROUP), a Tennessee
Domiciled Insurance Company

Defendants

**MOTION OF LIQUIDATOR OF DOCTORS INSURANCE RECIPROCAL (RRG) (IN
LIQUIDATION) TO APPROVE PLAN FOR CLOSURE OF LIQUIDATION ESTATE**

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

As set forth in **Exhibit 1**, the plan for closure of the DIR Liquidation Estate is orderly and reasonable. It addresses the final receipt of assets owed to the DIR 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 DIR

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 DIR 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 DIR Liquidation Proceedings toward closure. But the relief afforded through granting this Motion does not address all matters at issue in the DIR Liquidation Proceedings. In order to provide certainty with regard to the relief granted, the DIR 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 DIR Liquidator, by and through his Special Deputy Receiver, moves the Court to approve the plan of closure for the DIR Liquidation Estate as set forth in **Exhibit 1**.

Respectfully submitted,



J. Graham Matherne BPR 11294
WYATT, TARRANT & COMBS, LLP
333 Commerce Street, Suite 1050
Nashville, Tennessee 37201-1837
(615) 244-0020

*Counsel for Jeanne B. Bryant, Special Deputy
Receiver for Doctors 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.



Counsel to the DIR Special Deputy Receiver