

NO. D-1-GN-18-001933

TEXAS DEPARTMENT OF INSURANCE § IN THE DISTRICT COURT OF  
VS. § TRAVIS COUNTY, TEXAS  
GRAND COURT ORDER OF CALANTHE § 250TH JUDICIAL DISTRICT

**NOTICE OF SUBMISSION**  
**(Application for Order of Liquidation)**

In accordance with the Order of Reference to Master (Order of Reference) entered in this cause, the *Application for Order of Liquidation* is set for submission before the Special Master, Tom Collins, (Master) on **Monday, September 28, 2020**. Pursuant to Tex. Ins. Code § 443.007 (e) and TEX. R. CIV. P. 171, the Order of Reference has established the following rules:

1. The Master may consider the Application by written submission or oral hearing.
2. If no objection is filed in compliance with the Order of Reference, the Master may consider the Application without a hearing, and the Court may enter the order recommended by the Master upon its submission to the Court. A party waives any right to object to the recommendation of the Master if the party does not file an objection in compliance with the Order of Reference.
3. Any objection must be filed with the Travis County District Clerk at least three (3) calendar days before the Submission Date in the above referenced case.
4. A copy of any objection must be sent by email to the following:
  - (a) The Master's Docket Clerk at [SpecialMasterClerk@tdi.texas.gov](mailto:SpecialMasterClerk@tdi.texas.gov).
  - (b) All parties listed on the Certificate of Service attached to the Application.
  - (c) The Applicant's counsel at [rstroud@thestroutfirm.com](mailto:rstroud@thestroutfirm.com), Rachel Stroud.
5. Any objection must specifically set out the reasons for the objection, with supporting references to and discussion of statutory and case authorities. Reasons not stated in writing will not be considered orally by the Master.

6. An objecting party must expeditiously coordinate with the Applicant's counsel and with the Master's docket clerk at (512) 676-6915 to request a hearing, unless the Master determines that a hearing is not necessary. If a hearing is granted, the objecting party must send a Notice of Oral Hearing to the Applicant's counsel and all parties listed on the Certificate of Service.
7. Any Acknowledgment of Notice and Waiver by a party in interest should be filed with the Court at least three (3) calendar days before the submission or hearing date.

Respectfully submitted,

THE STROUD FIRM, PLLC.  
16000 Pool Canyon Road  
Austin, Texas 78734  
Telephone: 512/293-8244  
Email: [rstroud@thestroudfirm.com](mailto:rstroud@thestroudfirm.com)

By: /s/ Rachel Stroud  
Rachel Stroud  
State Bar No. 19424700

Attorney for the Special Deputy Receiver

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served on all interested parties in accordance with the Texas Rules of Civil Procedure and Tex. Ins. Code § 443.007(d) this 14th day of September, 2020.

Mr. Tom Collins, Special Master  
Texas Department of Insurance  
333 Guadalupe, Tower III, 5th Fl., MC-305-1D  
Austin, Texas 78701  
Email: specialmasterclerk@tdi.texas.gov

Mr. Moses Chao  
Ms. Kathy Gartner  
Mr. James Kennedy  
Mr. David Wheelus  
Texas Department of Insurance  
P.O. Box 149104  
Austin, Texas 78714  
Email: moses.chao@tdi.texas.gov  
Email: kathy.gartner@tdi.texas.gov  
Email: james.kennedy@tdi.texas.gov  
Email: david.wheelus@tdi.texas.gov

Ms. Ann Hartley, Asst. Attorney General  
Attorney General's Office  
P.O. Box 12548  
Austin, Texas 78711-2548  
Email: ann.hartley@oag.texas.gov

Ms. Kimberly Yelkin (Attorney for the Advisory  
Committee, Calanthe Historical Society)  
Foley Gardere  
600 Congress Avenue, Suite 3000  
Austin, Texas 78701-2978  
Email: kyelkin@gardere.com

Ms. Jacqueline Rixen  
Attorney for Texas Life and Health Insurance Guaranty Association  
Law Office of Jacqueline Rixen  
8500 N. Mopac, Suite 605  
Austin, Texas 78759  
Email: jrixen@rixenlaw.com

Ms. Sharon Williams  
Mr. Lloyd Randolph  
United States Department of Justice  
P.O. Box 875, Ben Franklin Station  
Washington, DC 20044-0875  
Via Email: sharon.williams@usdoj.gov  
Via Email: lloyd.randolph@usdoj.gov

Department of The Treasury  
Internal Revenue Service  
Ogden, UT 84201-0115

Debra Jackson  
Operations Manager CAWR  
Internal Revenue Service  
P.O. Box 87 CAWR/FUTA  
Memphis, TN 38101-0087

United States Treasury  
Internal Revenue Service  
Cincinnati, OH 45999-0150

/s/ Rachel J. Stroud  
Rachel J. Stroud  
Email: rstroud@thestroutfirm.com