

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. 03-295 (IV)

Petitioner

v.

THE RECIPROCAL ALLIANCE (RISK  
RETENTION GROUP), a Tennessee  
Domiciled Insurance Company

Defendants

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MOTION OF LIQUIDATOR OF THE RECIPROCAL ALLIANCE (RRG) (IN  
LIQUIDATION) TO APPROVE PLAN FOR CLOSURE OF LIQUIDATION ESTATE

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

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

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 TRA 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>). Notice will also be provided to COPIC Insurance and to ACA Insurance Trust, Inc.

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

Respectfully submitted,

  
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J. Graham Matherne      BPR 11294  
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*Counsel for Jeanne B. Bryant, Special Deputy  
Receiver for The Reciprocal Alliance (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 8<sup>th</sup> day of July, 2020:

Sarah A. Hiestand, Senior Counsel  
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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 8<sup>th</sup> day of July, 2020.

*Josh Mathews*  
Counsel to the TRA Special Deputy Receiver