

CAUSE NO. D-1-GN-18-001285

THE TEXAS DEPARTMENT OF	§	IN THE DISTRICT COURT OF
INSURANCE,	§	
<i>Plaintiff,</i>	§	
	§	
v.	§	TRAVIS COUNTY, TEXAS
	§	
ACCESS INSURANCE COMPANY,	§	
<i>Defendant.</i>	§	261 ST JUDICIAL DISTRICT

AMENDED MOTION TO WITHDRAW
AND NOTICE OF HEARING

TO THE HONORABLE JUDGE OF SAID COURT:

Christopher Fuller, counsel for CANTILO & BENNETT, L.L.P., in its capacity as Special Deputy Receiver of Access Insurance Company, Inc. (the “SDR” and “AIC” respectively), files this Amended Motion to Withdraw (the “Motion”).

1. This Motion is filed pursuant to TEX. R. CIV. PROC. 10 and Local Rule 6.2. Mr. Fuller moves to withdraw as counsel for the SDR.

2. The SDR has been notified in writing about the Motion, informed of its right to object and the potential consequences of the withdrawal. The SDR does not object to the withdrawal.

3. Good cause exists to grant the Motion because Mr. Fuller is retiring.

4. Going forward, the SDR’s attorney in charge shall be existing co-counsel, Greg Pierce. His address and contact information is:

Gregory A. Pierce
State Bar No. 15994250
P.O. Box 40
Austin, Texas 78767
Tel: (512) 474-2154
gpierce@gpiercelaw.com

5. The withdrawal is not sought for purposes of delay and will not delay any proceedings. I certify that there are no rulings of the court that have yet to be reduced to writing.

6. The Motion has been served on the Service List for this delinquency proceeding and on the SDR by email and mailed to the SDR by both certified and regular first-class mail.

7. The original Motion to Withdraw has been amended to reflect that it is set for hearing directly to the Receivership Court and not set for submission to the Special Master under the Order of Reference.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Christopher Fuller respectfully prays that this Court enter an order:

1. Granting the Motion;
2. Mr. Fuller is authorized to withdraw;
3. Recognizing Greg Pierce as attorney in charge; and
4. Granting Mr. Fuller such other and further relief to which he may be justly entitled.

Respectfully submitted,

/s/ Christopher Fuller
Christopher Fuller
Texas Bar No. 07515500
4612 Ridge Oak Drive
Austin, Texas 78731
Telephone: (512) 470-9544
Email: cfuller@fullerlaw.org

**Attorney for CANTILO & BENNETT, L.L.P.,
Special Deputy Receiver of
Access Insurance Company**

APPLICANT'S NOTICE OF HEARING

Christopher Fuller's Amended Motion to Withdraw is hereby set for hearing on July 17, 2025 at 2:00 p.m. before the 419th District Court of Travis County Texas, 1700 Guadalupe, 11th floor, Austin TX 78701.

/s/ Christopher Fuller
Christopher Fuller

CERTIFICATE OF SERVICE

I certify that a true and correct copy of Christopher Fuller's *Amended Motion to Withdraw and Notice of Hearing* was sent in accordance with the Texas Rules of Civil Procedure on July 8, 2025 to:

Via Email: specialmasterclerk@tdi.texas.gov

Tom Collins, Receivership Master
c/o Special Master's Clerk
RLO MC-FRD
PO Box 12030
Austin, TX 78711-2030

Via e-Service: Shawn.Martin@tdi.texas.gov

Shawn Martin
TEXAS DEPARTMENT OF INSURANCE
RLO MC-FRD
PO Box 12030
Austin, TX 78711-2030

Via Email: David.Carbajal@tdi.texas.gov

David Carbajal
TEXAS DEPARTMENT OF INSURANCE
RLO MC-FRD
PO Box 12030
Austin, TX 78711-2030

Via Email: Vane.Hugo@tdi.texas.gov

Vane Hugo
TEXAS DEPARTMENT OF INSURANCE
RLO MC-FRD
PO Box 12030
Austin, TX 78711-2030

Via e-Service: Zachary.Rhines@oag.texas.gov

Zachary L. Rhines
Assistant Attorney General
General Litigation Division
OFFICE OF THE TEXAS ATTORNEY GENERAL
P.O. Box 12548, Mail Stop 01901
Austin, TX 78711-2548
Counsel for Texas Department of Insurance

Via e-Service: bburner@mwlaw.com

Burnie Burner
MITCHELL, WILLIAMS, SELIG, GATES &
WOODYARD, PLLC
500 W. 5th Street Suite 1150
Austin, TX 78701
*Counsel for Defendant
Access Insurance Company*

Via Email: aiga01@bellsouth.net

Andrea Lentine
Executive Director
ALABAMA INSURANCE GUARANTY
ASSOCIATION
2020 Canyon Road, Suite 200
Birmingham, AL 35216

Via Email: guarantyfunds@difi.az.gov

ARIZONA PROPERTY & CASUALTY
GUARANTY FUND
100 North 15 Avenue, Suite 261
Phoenix, AZ 85007-2624

Via Email: AMinor@arkansas.gov

Amanda Minor
ARKANSAS PROPERTY & CASUALTY
GUARANTY FUND
1023 W. Capitol Avenue, Suite 2
Little Rock, AR 72201

Via Email: RoeberB@caiga.org

Brad Roeber, Executive Director
CALIFORNIA INSURANCE GUARANTEE
ASSOCIATION
PO Box 29066
Glendale, CA 91209-9066

Via Email: stbrown@agfgroup.org
Via Email: bricker@agfgroup.org
Steve Brown, Chief Operating Officer
Bob Ricker, Executive Director
FLORIDA INSURANCE GUARANTY ASSOCIATION
PO Box 15159
Tallahassee, FL 32317

Via Email: abarbera@quadassoc.org
Amanda Barbera
Executive Director
INDIANA INSURANCE GUARANTY ASSOCIATION
3502 Woodview Trace, Suite 100
Indianapolis, IN 46268

Via Email: blaw@gfms.org
Barbara Peterson law
President
GUARANTY FUND MANAGEMENT SERVICES
One Bowdoin Square
Boston, MA 02114-2916

Via Email: BGilbert@niga-pc.org
Bruce W. Gilbert
Executive Director
NEVADA INSURANCE GUARANTY ASSOCIATION
3821 West Charleston Boulevard, Suite 100
Las Vegas, NV 89102-1859

Via Email: JCannon@opciga.org
Jessica Cannon
OKLAHOMA PROPERTY & CASUALTY
INSURANCE GUARANTY ASSOCIATION
2601 Northwest Expressway, Suite 330E
Oklahoma City, OK 73112

Via Email: smitty@scwind.com
J. Smith Harrison
Executive Director/Secretary
SOUTH CAROLINA PROPERTY & CASUALTY
INSURANCE GUARANTY ASSOCIATION
PO Box 407
Columbia, SC 29202

Via Email: fknighton@gaiga.org
Frank Knighton
Executive Director
GEORGIA INSURERS INSOLVENCY POOL
3700 Crestwood Parkway NW, Suite 400
Duluth, GA 30096

Via Email: JWells@laiga.org
John Wells
Executive Director
LOUISIANA INSURANCE GUARANTY ASSOCIATION
2142 Quail Run Drive
Baton Rouge, LA 70808-4126

Via Email: arussell@msiga.net
Arthur Russell
Executive Director
MISSISSIPPI INSURANCE GUARANTY ASSOCIATION
713 South Pear Orchard Road, Suite 200
Ridgeland, MS 39157-4823

Via Email: debbiel@integriongroup.com
Debbie Luera
Director of Operations
NEW MEXICO INSURANCE GUARANTY
ASSOCIATION - Integrion Group, Inc.
PO Box 27815
Albuquerque, NM 87125

Via Email: rbauso@ppciga.org
Raymond Bauso, Executive Director
PENNSYLVANIA PROPERTY & CASUALTY
INSURANCE GUARANTY ASSOCIATION
One Penn Center, Suite 1850
1617 John F. Kennedy Boulevard
Philadelphia, PA 19103

Via Email: lbrouse@tiga.net
Via Email: knations@tiga.net
Lorrie Brouse, Executive Secretary
Kerry Nations, Plan Administrator
TENNESSEE INSURANCE GUARANTY ASSOCIATION
3100 West End Ave., Suite 670
Nashville, TN 37203-5805

Via Email: awalker@tpciga.org

Via Email: rstroud@tpciga.org

Via Email: slang@tpciga.org

Amber A. Walker, Rachel Stroud, & Sara Lang
TEXAS PROPERTY CASUALTY INSURANCE
GUARANTY ASSOCIATION (TPCIGA)
8911 N. Capital of Texas Hwy, Ste 2200
Austin, TX 78759

Via Email: jdamato@tpciga.org

John J. D'Amato, CPA, Chief Financial Officer
TEXAS PROPERTY AND CASUALTY INSURANCE
GUARANTY ASSOCIATION (TPCIGA)
8911 N. Capital of Texas Hwy, Ste 2200
Austin, TX 78759

Via Email: Wallock.Michael@aaa-calif.com

Mike Wallock
Office of the General Counsel
AUTOMOBILE CLUB OF SOUTHERN CALIFORNIA
3333 Fairview Rd., A-451
Costa Mesa, CA 92626

Via Email: Stanley.jason@aaa-texas.com

Jason Stanley
Subrogation Claims Team Manager
AAA TEXAS
Dallas, TX

Via First Class Mail

INTERNAL REVENUE SERVICE
Special Procedures Branch
300 East 8th Street, Suite 352
Mail Stop 5026AUS
Austin, TX 78701

Via e-Service: Elliott.Kroll@arentfox.com

Elliott Kroll
ARENT FOX, LLP
1301 Avenue of the Americas, Floor 42
New York, NY 10019
*Attorneys for Allianz Risk Transfer AG
(Bermuda Branch)*

Via Email: mtsutsui@tpciga.org

Mark Tsutsui, Executive Director
TEXAS PROPERTY AND CASUALTY INSURANCE
GUARANTY ASSOCIATION (TPCIGA)
8911 N. Capital of Texas Hwy, Ste 2200
Austin, TX 78759

Via Email: aevans@tpciga.org

Annette Evans, Claims Director
TEXAS PROPERTY AND CASUALTY INSURANCE
GUARANTY ASSOCIATION (TPCIGA)
8911 N. Capital of Texas Hwy, Ste 2200
Austin, TX 78759

Via Email: Young.Courtney@aaa-calif.com

Courtney Young
Office of the General Counsel
AUTOMOBILE CLUB OF SOUTHERN CALIFORNIA
3333 Fairview Rd., A-451
Costa Mesa, CA 92626

Via Email: sternisha.andrew@aaa-texas.com

Andrew Sternisha
Subrogation Analyst
AAA Texas
Dallas, Texas

Via e-Service: anthony@icenoglefirm.com

Anthony Icenogle
ICENOGLE & BOGGINS, P.L.L.C.
6805 N. Capital of Texas Hwy., Ste 220
Austin, TX 78731
*Attorneys for Allianz Risk Transfer AG (Bermuda
Branch)*

Via Email: sesalch@cb-firm.com

Susan E. Salch
CANTILO & BENNETT, L.L.P.,
Special Deputy Receiver of
Access Insurance Company, Inc.
11401 Century Oaks Terrace, Suite 300,
Austin, Texas 78758

Via e-Service: gpierce@piercelaw.com

Greg Pierce

Attorney at Law

P.O. Box 40

Austin, Texas 78767

Attorney for CANTILO & BENNETT, LLP,

Special Deputy Receiver of

Access Insurance Co.

/s/ Christopher Fuller

Christopher Fuller

THE TEXAS DEPARTMENT OF
INSURANCE,
Plaintiff,

v.

ACCESS INSURANCE COMPANY,
Defendant.

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IN THE DISTRICT COURT OF

TRAVIS COUNTY, TEXAS

261ST JUDICIAL DISTRICT

ORDER GRANTING AMENDED MOTION TO WITHDRAW

On this date, the Court heard the Amended Motion to Withdraw (the “Motion”) filed by Christopher Fuller, counsel for CANTILO & BENNETT, L.L.P., solely in its capacity as Special Deputy Receiver of Access Insurance Company (the “SDR” and “AIC,” respectively).

Having considered the Motion, the Court finds that notice of the Motion was proper; no objections to the Motion were filed; the Court has jurisdiction over the Motion and the parties affected hereunder; and the Motion should be granted in all respects.

All capitalized terms used herein shall have the same meaning as in the Motion.

IT IS, THEREFORE, ORDERED, ADJUDGED AND DECREED as follows:

- 1) The Motion is GRANTED in all respects.
- 2) Mr. Fuller is authorized to withdraw.
- 3) Greg Pierce, State Bar No. 15994250, P.O. Box 40 Austin, Texas 78767, Tel: (512) 474-2154; gpierce@gpiercelaw.com, is the attorney in charge for the SDR.
- 4) This Order constitutes a final order fully resolving all issues relating to the Motion.

Signed on _____, 2025.

JUDGE PRESIDING

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Christopher Fuller on behalf of Christopher Fuller

Bar No. 07515500

cfuller@fullerlaw.org

Envelope ID: 102893848

Filing Code Description: Motion (No Fee)

Filing Description: AMENDED MOTION TO WITHDRAW AND NOTICE OF HEARING

Status as of 7/9/2025 10:03 AM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Brian Falligant		bfalligant@inquestresources.com	7/8/2025 6:03:13 PM	SENT
Special Masters Clerk Special Masters Clerk		specialmasterclerk@tdi.texas.gov	7/8/2025 6:03:13 PM	SENT
Melvin Burner	3425700	bburner@mwlaw.com	7/8/2025 6:03:13 PM	SENT
Anthony Icenogle	10382948	anthony@icenoglefirm.com	7/8/2025 6:03:13 PM	SENT
Patricia Muniz		pmuniz@inquestresources.com	7/8/2025 6:03:13 PM	SENT
David Broemel		dbroemel@bakerdonelson.com	7/8/2025 6:03:13 PM	SENT

Associated Case Party: CANTILO AND BENNETT LLP

Name	BarNumber	Email	TimestampSubmitted	Status
Gregory Pierce	15994250	gpierce@gpiercelaw.com	7/8/2025 6:03:13 PM	SENT

Associated Case Party: TEXAS DEPARTMENT OF INSURANCE

Name	BarNumber	Email	TimestampSubmitted	Status
Zachary Rhines	24116957	zachary.rhines@oag.texas.gov	7/8/2025 6:03:13 PM	SENT