

CAUSE NO. D-1-GN-23-008361

THE TEXAS DEPARTMENT OF	§	IN THE DISTRICT COURT OF
INSURANCE,	§	
<i>Plaintiff,</i>	§	
	§	
v.	§	TRAVIS COUNTY, TEXAS
	§	
BRIGHT HEALTHCARE INSURANCE	§	
COMPANY OF TEXAS	§	
<i>Defendant.</i>	§	455th JUDICIAL DISTRICT

SPECIAL DEPUTY RECEIVER’S
APPLICATION TO APPROVE FIRST EARLY ACCESS DISTRIBUTION

CANTILO & BENNETT, L.L.P., Special Deputy Receiver of Bright Healthcare Insurance Company of Texas (the “SDR” and “BHICOT,” respectively), files its Application to Approve First Early Access Distribution (the “Application”).

I. INTRODUCTION

1.1 The SDR files this Application for authority to make a first early access distribution to the Texas Life and Health Insurance Guaranty Association (“TLHIGA”) for \$8,659,686. TLHIGA is the only guaranty association having obligations arising from this liquidation. At present, the SDR estimates that the current unencumbered cash and cash equivalent assets of the BHICOT estate will exceed the amount of all Class 1 and Class 2 claims. Accordingly, providing an early access payment to TLHIGA in the requested amount is appropriate. Moreover, pursuant to relevant law, if the SDR’s estimates are incorrect, TLHIGA will repay the BHICOT estate any sums necessary to ensure that TLHIGA does not receive a preference for its claims.

II. AUTHORITY

2.1 The SDR is authorized to file this Application pursuant to TEX. INS. CODE § 443.303, which provides for early access distributions to insurance guaranty associations with the approval of this Court.

2.2 The subject matter of this Application is referred to the Special Master appointed in this proceeding in accordance with Section III of the *Order of Reference to Master* entered on November 29, 2023.

III. BACKGROUND

3.1 On November 29, 2023, the Court entered an *Agreed Order Appointing Liquidator, Permanent Injunction, and Notice of Automatic Stay* appointing the Texas Commissioner of Insurance as Liquidator of BHICOT. Effective November 29, 2023, the Texas Commissioner of Insurance, as Liquidator, appointed CANTILO & BENNETT, L.L.P. as SDR of BHICOT.

3.2 This Court has jurisdiction over the subject matter of this Application and of the affected parties pursuant to TEX. INS. CODE § 443.005.

3.3 The SDR must either apply for authority to make an early access distribution or report that there are no distributable assets within 120 days of liquidation. On March 21, 2024, the SDR filed its *First Early Access Report Pursuant to TEX. INS. CODE § 443.303(c) in compliance with that statute's obligation* stating that the SDR had not as of that date been able to determine the amount needed to be reserved from the general assets. There were no objections to the report.

3.4 The SDR has determined that the estate has distributable assets and now seeks Receivership Court authority to make a first early access distribution to TLHIGA, so the guaranty association may use the advance against distributions to pay its incurred Class 1 expenses and Class 2 payments of policyholder benefits.

IV. REPORT ON DISTRIBUTABLE ASSETS

4.1 **Approval of the First Early Access Distribution.** Pursuant to TEX. INS. CODE § 443.303, the SDR shall apply to the Court for approval to make early access payments to a guaranty association having obligations in connection with the liquidation on at least an annual

basis if distributable assets are available. However, distributions are not limited to a set timetable and the SDR may, at its sole and absolute discretion, seek a distribution at any time that it determines that an estate has distributable assets. Early access payments are not limited to the claims and expenses paid to date by a guaranty association; however, the SDR may not make a distribution to a guaranty association in excess of all anticipated claims of the guaranty association. Amounts advanced to a guaranty association under TEX. INS. CODE § 443.303 are treated as advances against distributions to be made under TEX. INS. CODE § 443.302.

TEX. INS. CODE § 443.303 (c) provides:

Within 120 days after the entry of an order of liquidation by the receivership court, and at least annually after the entry of the order, the liquidator shall apply to the receivership court for approval to make early access payments out of the general assets of the insurer to any guaranty associations having obligations arising in connection with the liquidation or shall report that there are no distributable assets at that time based on financial reporting as required in Section 443.016.

4.2 TEX. INS. CODE § 443.303(f) directs that an application for early access payments shall, based on the best information available to the SDR at the time, provide the following:

- (1) the amount reserved for the entire expenses of the liquidation through and after its closure and for distributions on claims, to the extent necessary and appropriate;
- (2) the computation of distributable assets and the amount and method of equitable allocation of early access payments to each of the guaranty associations; and
- (3) the most recent financial information filed with the National Association of Insurance Commissioners.

V. DISTRIBUTABLE ASSETS

5.1 TEX. INS. CODE § 443.303(a) defines “distributable assets” as all general assets of the receivership estate, less the necessary and appropriate amounts reserved for expenses of liquidation through and after closure and distributions on claims other than those of the guaranty associations that fall within the priority classes of claims established in § 443.301(b). As of October 31, 2024, the unrestricted cash and cash equivalent assets of the receivership estate are

approximately \$67,474,303. Copies of the October 31, 2024, Statement of Assets and Statement of Liabilities are attached as Exhibits 1 and 2, respectively. The amount reserved for the estimated remaining entire expenses of the liquidation through and after its closing is approximately \$22 million dollars. After adjustment for expenses of liquidation and establishing a prudent reserve, the SDR's preliminary estimate for liquid "distributable assets" for the first early access distribution is in excess of the \$8,659,686 that the SDR seeks to distribute to TLHIGA. The SDR's preliminary estimate for "distributable assets" is based upon current projections of the receivership's future activities. The receivership reserves may change substantially due to unforeseen factors beyond the SDR's control.

VI. GUARANTY ASSOCIATION CLAIMS

6.1 The SDR has determined that a first early access distribution in the amount of \$8,659,686 will fund the association's incurred Class 1 claim up to August 31, 2024, and paid Class 2 covered claim obligations by TLHIGA up to September 14, 2024.

6.2 All reporting by TLHIGA on its Class 1 and Class 2 liabilities in connection with the BHICOT estate (as well as the SDR's estimates of its Class 1 costs and the potential amount of other Class 2 claims not covered by TLHIGA) are subject to supplementation as additional expenses and claim payments are incurred. The claims and reserve numbers have not been verified or audited. They are used exclusively for making the calculations necessary for this Application. Neither this Application, nor any other early access application, constitutes an adjudication of the Proof of Claim filed by TLHIGA.

6.3 At this time, the SDR seeks to make an early access distribution based on the incurred Class 1 expenses and Class 2 claim payments for TLHIGA. The SDR estimates that after

payment of the proposed first early access distribution, the BHICOT estate will retain sufficient unrestricted assets to pay all Class 1 and 2 claims in full.

VII. PROPOSED DISTRIBUTION

7.1 The SDR proposes to distribute \$8,659,686 from the receivership estate as the first early access distribution to TLHIGA. The SDR will make the distribution following thirty (30) days after the date the Order is entered by the Receivership Court, unless a motion for new trial or an appeal is filed, or an order staying the distribution is entered and not yet expired.

VIII. NOTICE

8.1 The SDR served this Application to all known parties in interest, including TLHIGA, and all individuals and entities identified by the SDR in the Certificate of Service by e-mail and, as noted, by mail or overnight delivery to certain government agencies. Further, this Application has been served in accordance with the provisions of TEX. INS. CODE § 443.303(e), which states:

Notice of each application for early access payments, or of any report required pursuant to this section, must be given in accordance with Section 443.007 to the guaranty associations that may have obligations arising from the liquidation. Notwithstanding the provisions of Section 443.007, the liquidator shall provide these guaranty associations with at least 30 days' actual notice of the filing of the application and with a complete copy of the application prior to any action by the receivership court. Any guaranty association that may have obligations arising in connection with the liquidation has:

- (1) the right to request additional information from the liquidator, who may not unreasonably deny such request; and
- (2) the right to object as provided by Section 443.007 to any part of each application or to any report filed by the liquidator pursuant to this section.

8.2 TLIGA has waived the requirement of thirty (30) days' notice of the Application; it is set for submission before the Special Master on December 9, 2024.

IX. OFFER OF PROOF AND VERIFICATION

9.1 This Application is verified by the affidavit and certification pursuant to TEX. INS. CODE § 443.017(b) by Michael P. Marcin, partner in CANTILO & BENNETT, L.L.P., SDR of BHICOT.

X. NOTICE OF ELECTRONIC SERVICE REQUIREMENT

10.1 All pleadings filed in response to this Application or in regard to this estate shall be served by e-mail on the undersigned counsel and all parties shown in the attached Certificate of Service.

PRAYER

WHEREFORE, PREMISES CONSIDERED, CANTILO & BENNETT, L.L.P., in its capacity as Special Deputy Receiver of Bright Health Insurance Company of Texas, respectfully prays that this Court enter an Order:

1. Approving the Application in all respects;
2. Authorizing the SDR to distribute \$8,659,686 from the assets of the receivership estate to TLHIGA as the first early access distribution pursuant to TEX. INS. CODE § 443.303;
3. Authorizing the SDR to make the early access distribution following thirty (30) business days after the date the Order is entered by the Receivership Court, unless a motion for new trial or an appeal is filed, or an order staying the distribution is entered and not yet expired;
4. Ordering that TLHIGA shall, upon deposit of the payment in an account to TLIGHA's benefit, be deemed to have agreed to the provisions of TEX. INS. CODE § 443.303 and, in particular, § 443.303(g);

5. Authorizing the SDR to take any actions necessary to implement the Order;
6. Finding that the Order constitutes a final order resolving fully all issues relating to this Application, provided that this Court shall retain jurisdiction to issue further orders pursuant to TEX. INS. CODE Chapter 443; and
7. Granting the SDR such other and further relief to which it may be justly entitled.

Respectfully submitted,

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

-and-

Christopher Fuller
State Bar No. 07515500
FULLER LAW GROUP
4612 Ridge Oak Drive
Austin, Texas 78731
Telephone: (512) 470-9544
cfuller@fullerlaw.org

**Attorneys for CANTILO & BENNETT, LLP,
Special Deputy Receiver of
Bright Healthcare Insurance Company of Texas**

APPLICANT'S NOTICE OF SUBMISSION

Pursuant to the terms of the Agreed Order of Reference to Master entered by the District Court in this cause, the *Application to Approve First Early Access Distribution* is hereby set for written submission before the Master, Tom Collins, on **December 9, 2024**.

The Master has asked that the following rules be provided to you:

1. Any objection must be filed with the Travis County District Clerk at least three (3) calendar days before the submission date.
2. A copy of any objection shall be served by e-mail by such date on:
 - (a) The Special Master's Docket Clerk, at specialmasterclerk@tdi.texas.gov;
 - (b) The undersigned counsel, Greg Pierce at gpierce@gpiercelaw.com; and
 - (c) All interested parties, including those listed on the SDR's Certificate of Service.
3. The objecting party shall coordinate with the SDR's counsel and the Docket Clerk [(512) 676-6915] to obtain an oral hearing setting for argument on the Application and Objection, and complete and attach an "Objecting Party's Notice of Oral Hearing" to the objection.
4. The written objection must specifically list all reasons for objection with supporting references to and discussion of statutory and case authorities. Reasons not stated in writing will not be considered orally.
5. **Please note that if an objection is not filed as described in the Notice of Submission, the Master may consider the Application without a hearing.**
6. **Failure to file timely a written objection before the Special Master constitutes a waiver of the right to object to the Special Master's recommendation to the District Court.**
7. Any Acknowledgment of Notice and Waiver to be filed by the Guaranty Association or other interested party should be filed at least three (3) calendar days before the submission or hearing date.

/s/ Greg Pierce
Gregory A. Pierce

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the *Application to Approve First Early Access Distribution* was sent in accordance with TEX. INS. CODE § 443.007(d) on November 22, 2024 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 Email: Edwin.Hartsfield@tdi.texas.gov

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

Via Email: John.Walker@tdi.texas.gov

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

Vane Hugo
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Sandra Salazar
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Office of Financial Counsel
TEXAS DEPARTMENT OF INSURANCE
PO Box 12030
Austin, TX 78711-2030

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

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General Counsel Division
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Austin, TX 78711-2030

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

Zachary L. Rhines
Assistant Attorney General
General Litigation Division
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Counsel for Texas Department of Insurance

Via e-Service: jrixen@rixenlaw.com

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Via e-Service: sstrickland@mwlaw.com

Stanton Strickland
MITCHELL, WILLIAMS, SELIG, GATES &
WOODYARD, P.L.L.C.
500 W. 5th Street, Ste. 1150
Austin, Texas 78701
Counsel for Bright Health Management, Inc.

Via Email: Milan.Shah@cms.hhs.gov

Via Email: Kelly.Drury@cms.hhs.gov

Milan Shah

Kelly Drury

Centers for Medicare & Medicaid Services

Center for Consumer Information and

Insurance Oversight

7501 Wisconsin Ave

Bethesda, MD 21814

Via Email: ASimon@fmdlegal.com

Via Email: Bgould@fmdlegal.com

Adrienne J. Simon

Blake Gould

Fultz Maddox Dickens PLC

101 South Fifth Street, 27th Floor

Louisville, KY 40202

Counsel for THC Houston, LLC d/b/a Kindred

Hospital Houston Northwest

Via First Class Mail

INTERNAL REVENUE SERVICE

Special Procedures Branch

300 East 8th Street, Suite 352

Mail Stop 5026AUS

Austin, Texas 78701

/s/ Greg Pierce

Gregory A. Pierce


**SPECIAL DEPUTY RECEIVER'S VERIFICATION AND CERTIFICATION
PURSUANT TO TEX. INS.CODE ANN. §443.017(b)**

AFFIDAVIT OF MICHAEL P. MARCIN

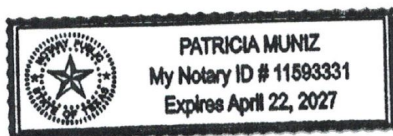
State of Texas
County of Travis

BEFORE ME, the undersigned authority appeared Michael P. Marcin, who after being by me duly sworn, stated the following under oath:

1. "My name is Michael P. Marcin. I am of sound mind, capable of making this affidavit, and am competent to testify to the matters contained in this affidavit.
2. I am a partner in CANTILO & BENNETT, L.L.P., the Special Deputy Receiver of Bright Health Insurance Company of Texas, Inc. (the "SDR" and "BHICOT" respectively), I am duly authorized to make this Affidavit on behalf of the SDR.
3. I have reviewed the *Application for Approval of Claim Filing Deadline, Notice to Creditors, and Procedures for Processing Claims* and the facts stated therein are true and correct based on my personal knowledge, my review of estate records and my consultation with the staff and subcontractors.
4. I certify that the exhibits, books, accounts, records, papers, correspondence, and/or other records and documents attached hereto were produced pursuant to TEX. INS. CODE § 443.017, are either true and correct copies of records of BHICOT and were received from the custody of BHICOT or found among its effects, or were created by and filed with the Receiver's office in connection with the receivership of this delinquent company, and are held by the Special Deputy Receiver in its official capacity."

By: 
Michael Marcin

SUBSCRIBED AND SWORN TO BEFORE ME on November 22, 2024, by Michael P. Marcin, Special Deputy Receiver of Bright Healthcare Insurance Company of Texas, Inc.



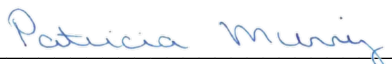

Notary Public

EXHIBIT 1

R-566

**Bright Healthcare Insurance Company of Texas
Statement of Net Assets**

**For the Period Ending
10/31/24**

Line		10/31/24
Cash		
1	Cash	67,474,303
	Cash - Unrestricted	
	APF Funds (Loan proceeds)	
Investments		
2	Short-Term Investments	
3	Bonds	
4	Stocks - Preferred & Common	
5	Investments in Subsidiaries, Controlled or Affiliated Entities	
6	Mortgage Loans	
7	Real Estate	
8	Policy Loans	
9	Other Invested Assets	
Restricted Assets		
10	Statutory Deposits	
11	Funds held by or deposited with Reinsured Companies	
12	Restricted - Other	
Reinsurance Receivable		
13	Reinsurance Recoverables on Paid Losses & LAE (net of allowance)	0
14	Reinsurance Recoverables on Unpaid Losses & LAE (net of allowance)	
15	Reinsurance Recoverables on UEP & Contingent Commissions	
Other Receivables		
16	Salvage & Subrogation Recoveries	
17	Premiums Due from Agents & Policyholders	
18	Receivable from Parents, Subsidiaries & Affiliates	0
19	Receivable from Guaranty Associations - Early Access Payments	
20	Other Receivables	
	RX Rebates Receivable	0
	Other Receivables	0
Other Assets		
21	FF&E	
22	Other Assets	
	Deferred Tax Asset	0
Total Assets		67,474,303

**Exhibit
1**

EXHIBIT 2

R-566

**Bright Healthcare Insurance Company of Texas
Statement of Net Liabilities**

**For Period Ending
10/31/24**

Line		10/31/24
1	Secured Claims	
2	APF Loan	
3	Special Deposit Claims	
Administrative Claims - Class 1		
4	Administrative Claims - State/Receiver	
	Special Deputy Receiver, Subcontractors Fees & Expenses	206,484
	Liquidation Oversight	19,101
	Special Master's Fees	5,320
5	Administrative Claims - Guaranty Assns	
	Administrative Expense Paid	4,867,500
	Administrative Expense Reserves	
6	LAE - Guaranty Assns	
	LAE Paid	
	LAE Reserves	
Policy Claims - Class 2		
7	Loss Claims - Guaranty Assns	
	Loss Claims Paid	4,500,474
	Loss Claims Reserves	
8	Loss Claims - Other	
	Other Loss Claims Paid	
	Other Loss Claims Reserves	
9	LAE - Other	
10	Unearned & Advance Premium Claims - GA	
11	Unearned & Advance Premium Claims - Other	840,591
Other Liabilities		
12	Class 3 Claims	91,203,223
13	Class 4 Claims	
14	Class 5 General Unsecured Creditor Claims	371,811
15	Class 5 Reinsurance Related Unsecured Claims	
16	Class 6 Claims	
17	Class 7 Claims	
18	Class 8 Claims	
19	Class 9 Claims	
20	Class 10 Interest	
21	Class 11 Claims	
22	Other Liabilities	
	Total Liabilities	102,014,504
23	Total Equity/(Deficit) Excess (Deficiency) of Assets over Liabilities	(34,540,201)
	Total Liabilities & Equity	67,474,303

Exhibit

2

THE TEXAS DEPARTMENT OF	§	IN THE DISTRICT COURT OF
INSURANCE,	§	
<i>Plaintiff,</i>	§	
	§	
v.	§	TRAVIS COUNTY, TEXAS
	§	
BRIGHT HEALTHCARE INSURANCE	§	
COMPANY OF TEXAS	§	
<i>Defendant.</i>	§	455th JUDICIAL DISTRICT

**ORDER GRANTING SPECIAL DEPUTY RECEIVER’S APPLICATION
TO APPROVE FIRST EARLY ACCESS DISTRIBUTION**

On this date, the Court heard the *Special Deputy Receiver’s Application to Approve First Early Access Distribution* (collectively, the “Application”) filed by CANTILO & BENNETT, L.L.P., Special Deputy Receiver of Bright Healthcare Insurance Company of Texas (the “SDR” and “BHICOT” respectively). The SDR appeared by and through its counsel. The Application was submitted to the Master appointed in this cause (“Master”) in accordance with the *Order of Reference to Master* (“*Order of Reference*”). The Master issued a recommendation under Rule 171 of the Texas Rules of Civil Procedure, which is incorporated herein.

Having considered the Application and the recommendation, the Court finds as follows:

1. The *Order of Reference* provides that motions filed pursuant to TEX. INS. CODE § 443.303 are referred to the Master;
2. Notice of the Application was provided in accordance with TEX. INS. CODE § 443.007 (d) and the *Order of Reference*;
3. No objections to the Application were filed;
4. The Texas Life and Health Insurance Guaranty Association waived its right to thirty (30) days notice of the filing of the Application under TEX. INS. CODE § 443.303(e), and has filed its acknowledgment and waiver;

5. The Court has jurisdiction over the Application and the parties affected hereunder;
and

6. The SDR's Application should be granted as set forth below.

All capitalized terms used in this Order shall have the same meaning as used in the Application.

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

1. The Application is granted;
2. The SDR is authorized to distribute \$8,659,686 from the assets of the receivership estate to TLHIGA as the first Early Access Distribution pursuant to TEX. INS. CODE § 443.303;
3. The SDR is authorized to make the Early Access Distribution after thirty (30) days after the date the Order is entered by the Receivership Court, unless a motion for new trial or an appeal is filed, or an order staying the distribution is entered and not yet expired;
4. TLHIGA shall, upon deposit of the payment in an account to TLIGHA's benefit, be deemed to have agreed to the provisions of TEX. INS. CODE § 443.303 and, in particular, § 443.303(g);
5. The SDR is authorized to take any actions necessary to implement the Order;
6. The Court finds that the Order constitutes a final order fully resolving all issues relating to this Application, provided that this Court shall retain jurisdiction to issue further orders pursuant to TEX. INS. CODE Chapter 443

Signed on _____, 2024.

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.

Greg Pierce on behalf of Greg Pierce

Bar No. 15994250

gpierce@gpiercelaw.com

Envelope ID: 94638719

Filing Code Description: Motion (No Fee)

Filing Description: SPECIAL DEPUTY RECEIVER'S APPLICATION TO APPROVE FIRST EARLY ACCESS DISTRIBUTION

Status as of 11/23/2024 3:18 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Christopher Fuller	7515500	cfuller@fullerlaw.org	11/22/2024 5:32:10 PM	SENT
Gregory Pierce	15994250	gpierce@gpiercelaw.com	11/22/2024 5:32:10 PM	SENT
Patricia Muniz		pmuniz@inquestresources.com	11/22/2024 5:32:10 PM	SENT
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Blake Gould		Bgould@fmdlegal.com	11/22/2024 5:32:10 PM	SENT
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Associated Case Party: BRIGHT HEALTH MANAGEMENT, INC.

Name	BarNumber	Email	TimestampSubmitted	Status
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Lisa Alcantar	24069284	lalcantar@maynardnexsen.com	11/22/2024 5:32:10 PM	SENT
Carlos Soltero	791702	csoltero@maynardnexsen.com	11/22/2024 5:32:10 PM	SENT

Associated Case Party: BRIGHT HEALTHCARE INSURANCE COMPANY OF TEXAS

Name	BarNumber	Email	TimestampSubmitted	Status
Stanton Strickland	786392	sstrickland@mwlaw.com	11/22/2024 5:32:10 PM	SENT

Associated Case Party: Texas Life & Health Insurance Guaranty Association

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.

Greg Pierce on behalf of Greg Pierce

Bar No. 15994250

gpierce@gpiercelaw.com

Envelope ID: 94638719

Filing Code Description: Motion (No Fee)

Filing Description: SPECIAL DEPUTY RECEIVER'S APPLICATION TO APPROVE FIRST EARLY ACCESS DISTRIBUTION

Status as of 11/23/2024 3:18 PM CST

Associated Case Party: Texas Life & Health Insurance Guaranty Association

Name	BarNumber	Email	TimestampSubmitted	Status
Jacqueline Rixen	16962550	jrixen@rixenlaw.com	11/22/2024 5:32:10 PM	SENT

Associated Case Party: TEXAS DEPARTMENT OF INSURANCE

Name	BarNumber	Email	TimestampSubmitted	Status
Zachary Rhines	24116957	zachary.rhines@oag.texas.gov	11/22/2024 5:32:10 PM	SENT
Special Master Clerk		specialmasterclerk@tdi.texas.gov	11/22/2024 5:32:10 PM	SENT
Shawn Martin		Shawn.Martin@tdi.texas.gov	11/22/2024 5:32:10 PM	SENT