

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>	§	455 TH JUDICIAL DISTRICT

MOTION FOR SUBSTITUTION OF COUNSEL
(filed by the Texas Life & Health Insurance Guaranty Association)

TO THE HONORABLE JUDGE OF THIS COURT:

In accordance with TEX. R. CIV. P. 10, the Texas Life & Health Insurance Guaranty Association (“Association”) hereby files this Motion for Substitution of Counsel and, in support thereof, would respectfully show the Court as follows:

The Association desires substitution of counsel in the above-captioned case. The Association’s current counsel of record has agreed to the substitution. Accordingly, the Association respectfully requests that Jacqueline Rixen, RIXENLAW, be permitted to withdraw as the Association’s counsel and that Dan Price, SHANLEY PRICE, LLP, be substituted as new counsel of record for the Association. Mr. Price hereby makes his appearance as counsel of record for the Association. Mr. Price’s contact information appears below:

Dan Price
State Bar No. 24041725
SHANLEY PRICE, LLP
5501A Balcones Drive, Suite 218
Austin, Texas 78731
(512) 265-8985

(512) 675-6191 Fax
dprice@sp-legal.com

The withdrawal and substitution of counsel requested herein is not sought for purposes of delay, but so that justice may be served.

NOTICE

The Association provides notice of this Motion to the Special Deputy Receiver, all known parties of interest, and all persons identified in the Certificate of Service in the manner indicated herein below. The Motion is set for submission before the Special Master on January 6, 2025.

PRAYER

For these reasons, the Association respectfully requests that this Court enter an Order permitting Jacqueline Rixen to withdraw as the Association's counsel of record and substituting Dan Price as the Association's counsel of record.

Respectfully submitted,

SHANLEY PRICE, LLP
5501A Balcones Drive, Suite 218
Austin, Texas 78731
(512) 265-8985
(512) 675-6191 Fax
dprice@sp-legal.com

/s/ Dan Price

DAN PRICE (SBN: 24041725)

*Counsel for the Texas Life & Health Insurance
Guaranty Association*

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the Texas Life & Health Insurance Guaranty Association's *Motion to Substitute Counsel* was served on the parties listed below on December 19, 2024, pursuant to the *Agreed Order Appointing Liquidator, Permanent Injunction and Notice of Automatic Stay, Order of Reference to Master*, the TEXAS RULES OF CIVIL PROCEDURE, and TEX. INS. CODE § 443.007(d), by electronic mail, except as specifically noted.

Via E-mail: specialmasterclerk@tdi.texas.gov

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

Via e-Service: cfuller@fullerlaw.org

Christopher Fuller
Fuller Law Group
4612 Ridge Oak Drive
Austin, Texas 78731
Counsel for Special Deputy Receiver

Via E-mail: John.Walker@tdi.texas.gov

John Walker
TEXAS DEPARTMENT OF INSURANCE
RLO MC-FRD
P.O. Box 12030
Austin, TX 78711-2030

Via E-mail: Shawn.Martin@tdi.texas.gov

Shawn Martin
General Counsel Division
Office of Financial Counsel
TEXAS DEPARTMENT OF INSURANCE
P.O. Box 12030
Austin, Texas 78711-2030

Via E-Mail: Sandra.Salazar@tdi.texas.gov

Sandra Salazar
General Counsel Division
Office of Financial Counsel
TEXAS DEPARTMENT OF INSURANCE
P.O. Box 12030
Austin, TX 78711-2030

Via E-mail: Edwin.Hartsfield@tdi.texas.gov

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

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 E-mail: Vane.Hugo@tdi.texas.gov

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

Via e-Service: gpierce@gpiercelaw.com

Gregory A. Pierce
Attorney at Law
P.O. Box 40
Austin, Texas 78767
Counsel for Special Deputy Receiver

Via e-service: jrixen@rixenlaw.com

Jacqueline Rixen
RixenLaw
P.O. Box 9879
Austin, Texas 78766
Counsel for the Tex. Life & Health Ins. Guar. Ass'n

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, Texas 78711-2548
Counsel for Texas Department of Insurance

Via First Class Mail

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

Via E-mail: Milan.Shah@cms.hhs.gov

Via E-mail: Kelly.Drury@cms.hhs.gov
Milan Shah
Kelly Drury
Centers for Medicare & Medicaid Services
Center for Consumer Information and
Insurance Oversight
7501 Wisconsin Avenue
Bethesda, MD 21814

Via E-mail: ASimon@fmdlegal.com

Via E-mail: 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*

/s/ Dan Price

DAN PRICE

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**ORDER GRANTING TEXAS LIFE & HEALTH INSURANCE GUARANTY
ASSOCIATION'S
MOTION TO SUBSTITUTE COUNSEL**

CAME for consideration, the Texas Life & Health Insurance Guaranty Association's Motion to Substitute Counsel, and the Court, having considered said motion grants leave to DAN PRICE of the law firm of Shanley Price, LLP, 5501A Balcones Drive, Suite 218, Austin, Texas 78721, to appear as and substitute in as counsel of record for Texas Life & Health Insurance Guaranty Association and for Jacqueline Rixen and the law firm of RixenLaw to withdraw as counsel of record for the Texas Life & Health Insurance Guaranty Association.

Done this ____ day of _____, 2025.

JUDGE PRESIDING