

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 |

MOTION TO WITHDRAW

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 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.

PRAYER

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

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

Respectfully submitted,

/s/ Christopher Fuller
Christopher Fuller
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**Attorney for CANTILO & BENNETT, LLP,
Special Deputy Receiver of Access Insurance Co.**

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, Christopher Fuller's Motion to Withdraw is hereby set for written submission before the Special Master, Tom Collins, on **June 30, 2025**.

The Special Master has asked that the following rules be provided 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, Christopher Fuller at cfuller@fullerlaw.org; 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/ Christopher Fuller
Christopher Fuller

CERTIFICATE OF SERVICE

I certify that on June 16, 2025 a true and correct copy of Christopher Fuller's Motion to Withdraw was served pursuant to the Order of Reference, Texas Rules of Civil Procedure, TEX. INS. CODE ANN. SEC. 443.007(d) and the Court's order on electronic service on the following by email, except as specifically otherwise noted.

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

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Greg Pierce

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Attorney for CANTILO & BENNETT, LLP,

Special Deputy Receiver of

Access Insurance Co.

/s/Christopher Fuller

Christopher Fuller

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| | § | |
| v. | § | TRAVIS COUNTY, TEXAS |
| | § | |
| ACCESS INSURANCE COMPANY, | § | |
| <i>Defendant.</i> | § | 261 ST JUDICIAL DISTRICT |

ORDER GRANTING MOTION TO WITHDRAW

On this date, the Court heard the 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, as follows:

1. The *Order of Reference to Master* provides that motions are referred to the Special Master appointed in this proceeding;
2. Notice of the Motion was provided in accordance with TEX. INS. CODE § 443.007 and the *Order of Reference to Master*;
3. The Texas Property and Casualty Insurance Guaranty Association filed its acknowledgment and waiver;
4. No objections to the Motion were filed;
5. The Court has jurisdiction over the Motion and the parties affected hereunder; and
6. 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
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Envelope ID: 102064655
Filing Code Description: Motion (No Fee)
Filing Description: MOTION TO WITHDRAW
Status as of 6/16/2025 3:36 PM CST

Case Contacts

| Name | BarNumber | Email | TimestampSubmitted | Status |
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