

D-1-GV-13-000384

THE STATE OF TEXAS  
Plaintiff

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v.

UNIVERSAL HMO OF TEXAS, INC.  
Defendant

IN THE DISTRICT COURT OF

TRAVIS COUNTY, TEXAS

345th JUDICIAL DISTRICT

**THE SDR’S SUPPLEMENT TO MOTION TO APPROVE ASSIGNMENT FORMS**

TO THE HONORABLE JUDGE OF SAID COURT:

Jean Johnson, Special Deputy Receiver (“the SDR”) of Universal HMO of Texas, Inc., (hereinafter collectively referred to as “Universal Texas”), now files this *Supplement to Motion to Approve Assignment Forms* (the “Supplement to the Motion”). The SDR respectfully shows the Court the following:

On March 15, 2017, the SDR filed a Motion to Approve Assignment Forms (the “Motion”). The assignment form submitted for approval contained typographical errors and the SDR files this Supplement to the Motion to submit a revised assignment form for approval. The SDR supplements the Motion with the Supplemental Affidavit of Jean Johnson in Support of the SDR’s Motion to Approve Assignment Forms. The Supplemental Affidavit is attached as Exhibit “A” and incorporated herein for all purposes. The requested form to be used by any assignee in order for that assignment to be recognized is attached as Exhibit “A-1” to the Supplemental Affidavit.

**RELIEF REQUESTED**

1. The SDR respectfully requests that the Court enter an order granting the Motion and approving the use of the assignment form attached as Exhibit “A-1” to the Supplemental Affidavit of Jean Johnson.

2. The SDR also requests an order that any assignment must be received on the proper form by no later than the entry of an order approving the distribution of the respective assignor's claim, or the SDR may direct payment to the original claimant.

3. The SDR also requests all other just and equitable relief.

Respectfully submitted,

**Wisener Nunnally Roth LLP**

Original signed by

By: \_\_\_\_\_

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## Certificate of Service

I hereby certify that a true and correct copy of the foregoing document has been served on the following interested parties in accordance with Tex. Ins. Code §443.007(d) and the Rehabilitation Order this the 5<sup>th</sup> day of May, 2017.

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/s/ Michael C. Roth  
Michael C. Roth

# Exhibit A

**THE STATE OF TEXAS**  
**Plaintiff**

v.

**UNIVERSAL HMO OF TEXAS, INC.**  
**Defendant**

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**IN THE DISTRICT COURT OF**  
**TRAVIS COUNTY, TEXAS**  
**345th JUDICIAL DISTRICT**

**SUPPLEMENTAL AFFIDAVIT OF JEAN JOHNSON IN SUPPORT OF THE SDR'S**  
**MOTION TO APPROVE ASSIGNMENT FORMS**

TO THE HONORABLE JUDGE OF SAID COURT:

Came before me, a notary public, Jean Johnson, Special Deputy Receiver (“SDR”) of Universal HMO of Texas, Inc., who, being duly sworn, did subscribe and swear that:

1. I am Jean Johnson. I am the SDR of Universal HMO of Texas, Inc. (hereinafter collectively referred to as “Universal Texas”). I have personal knowledge of the facts to which I attest. I obtained my knowledge in my role as SDR.

2. I attach as Exhibit “A-1” the revised assignment form. I recommend the approval of the use of the assignment form as in the best interests of the estate.

3. I further recommend that the SDR should be authorized to make the payment to the original claimant, unless written notice of the assignment on the proper form has been provided to the SDR no later than the entry of an order approving the distribution of the respective assignor’s claim.

4. I recommend this process because requiring an approved form for assignments of claims and a deadline for the receipt of such form will streamline the distribution process, help

minimize payment errors, and provide protection for assignors of claims.

Original  
signed by

Jean Johnson

Subscribed and sworn to on this 4 day of May 2017, by Jean Johnson, before me, a notary public.

Original signed by

Notary Public



# Exhibit A-1



