

THE TEXAS DEPARTMENT OF	§	IN THE DISTRICT COURT OF
INSURANCE,	§	
<i>Plaintiff,</i>	§	
	§	TRAVIS COUNTY, TEXAS
v.	§	
	§	
FRIDAY HEALTH INSURANCE COMPANY,	§	
INC.,	§	
<i>Defendant.</i>	§	345 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
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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,

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/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 for Substitution of 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.

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/s/ Dan Price

DAN PRICE

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	§	TRAVIS COUNTY, TEXAS
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<i>Defendant.</i>	§	345 TH JUDICIAL DISTRICT

**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