

CAUSE NO. D-1-GN-23-001549

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

**AMENDED MOTION TO WITHDRAW  
AND NOTICE OF HEARING**

TO THE HONORABLE JUDGE OF SAID COURT:

Christopher Fuller, counsel for CANTILO & BENNETT, L.L.P., in its capacity as Special Deputy Receiver of Friday Health Insurance Company, Inc. (the “SDR” and “AIC” respectively), files this Amended 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](mailto: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.

7. The original Motion to Withdraw has been amended to reflect that it is set for hearing directly to the Receivership Court and not set for submission to the Special Master under the Order of Reference.

### PRAYER

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

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

Respectfully submitted,

/s/ Christopher Fuller  
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**Attorney for CANTILO & BENNETT, L.L.P.,  
Special Deputy Receiver of  
Friday Health Insurance Company, Inc.**

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

**ORDER GRANTING AMENDED MOTION TO WITHDRAW**

On this date, the Court heard the Amended 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 Friday Health Insurance Company, Inc. (the “SDR” and “FHIC,” respectively).

Having considered the Motion, the Court finds that notice of the Motion was proper; no objections to the Motion were filed; the Court has jurisdiction over the Motion and the parties affected hereunder; and 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](mailto: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

**APPLICANT'S NOTICE OF HEARING**

Christopher Fuller's Amended Motion to Withdraw is hereby set for hearing on July 17, 2025 at 2:00 p.m. before the 419<sup>th</sup> District Court of Travis County Texas, 1700 Guadalupe, 11<sup>th</sup> floor, Austin TX 78701.

*/s/ Christopher Fuller*

Christopher Fuller

## CERTIFICATE OF SERVICE

I certify that a true and correct copy of Christopher Fuller's *Amended Motion to Withdraw and Notice of Hearing* was sent in accordance with the Texas Rules of Civil Procedure on July 8, 2025 to:

*Via Email:* [specialmasterclerk@tdi.texas.gov](mailto:specialmasterclerk@tdi.texas.gov)

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*/s/ Christopher Fuller*  
\_\_\_\_\_  
Christopher Fuller

### Automated Certificate of eService

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Christopher Fuller on behalf of Christopher Fuller

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Filing Description: AMENDED MOTION TO WITHDRAW AND NOTICE OF HEARING

Status as of 7/9/2025 10:08 AM CST

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