19TH JUDICIAL DISTRICT COURT STATE OF LOUISIANA

PARISH OF EAST BATON ROUGE

JAMES J. DONELON, COMMISSIONER OF INSURANCE FOR THE STATE OF LOUISIANA

NUMBER: 717,274

SECTION: 26

Plaintiff,

Versus .

LIGHTHOUSE HOLDINGS GROUP, LLC, LIGHTHOUSE PROPERTY INSURANCE CORPORATION, LIGHTHOUSE EXCALIBUR INSURANCE COMPANY, DIMINO HOLDINGS GROUP, LLC, TWIMG, LLC, LIGHTHOUSE MANAGEMENT, LLC, LIGHTHOUSE MANAGERS GROUP, LLC, LIGHTHOUSE MANAGING AGENT SERVICES, LLC, PREPARED MANAGERS, LLC, and LIGHTHOUSE GULFCOAST MANAGEMENT, LLC

Defendants

MOTION FOR ORDER EXTENDING TIME OF CANCELLATION OF LOUISIANA POLICIES OF LIGHTHOUSE EXCALIBUR INSURANCE COMPANY UNTIL JULY 1, 2022, AT 12:01 A.M. CST

NOW INTO COURT, through undersigned counsel, comes James J. Donelon, Commissioner of Insurance for the State of Louisiana ("Commissioner" or "Liquidator"), as Liquidator of Lighthouse Excalibur Insurance Company ("Lighthouse Excalibur Insurance"), through his delegated and court-appointed Receiver, Billy J. Bostick ("Receiver"), who respectfully requests an order extending the time of cancellation of the Louisiana Policies of Lighthouse Excalibur Insurance, and respectfully represents as follows.

1.

On April 5, 2022, this Court issued an order placing Lighthouse Excalibur Insurance and related insurance entities in rehabilitation and appointing the Commissioner as Rehabilitator, and Billy J. Bostick as Receiver of Lighthouse Excalibur Insurance and related insurance entities in accordance with La. R.S. 22:2001, et seq.

On May 23, 2022, with a finding of insolvency, this Court issued an order placing Lighthouse Excalibur Insurance in liquidation and appointing the Commissioner as Liquidator, and Billy J. Bostick as Receiver of Lighthouse Excalibur Insurance ("Lighthouse Excalibur Insurance Liquidation Order").

3.

With regard to the Louisiana homeowners' insurance policies issued by Lighthouse Excalibur Insurance ("Louisiana Policies"), the Lighthouse Excalibur Insurance Liquidation Order provided that the Louisiana Policies "shall be cancelled follows:

- (a) All insurance policies issued by Lighthouse Excalibur Insurance in the state of Louisiana are cancelled upon the earlier of (i) thirty (30) days after the date this Order of Liquidation is entered, at 12:01 a.m. local time of the insured or policyholder of such direct policy or certificate of insurance; (ii) the expiration date of any such direct policy and/or certificate of insurance for which timely notice was given by Lighthouse Excalibur Insurance, if the expiration date is sooner than thirty (30) days after the entry of this Order of Liquidation; or (iii) the date the insured or policyholder of any such direct policy and/or certificate of insurance replaces the direct policy and/or certificate of insurance, or effects cancellation, if the insured or policyholder does so within thirty (30) days after the entry of this Order of Liquidation; and,
- (b) All executory contracts of Lighthouse Excalibur Insurance may be enforced, cancelled or modified by the Liquidator or Receiver in their discretion or as otherwise ordered by this Court."

4.

There are currently approximately 25,000 Louisiana Policies in-force which will cancel on June 22, 2022, at 12:01 a.m. CST, unless such cancellation date is extended by this Court.

5.

As a consequence of the impending policy cancellation date, the residual market insurer, Louisiana Citizens Property Insurance Corporation ("Louisiana Citizens Insurance"), La. R.S. 22:2291, et seq., has been inundated with applications from Louisiana homeowners for replacement insurance coverage, which despite diligent and good faith efforts by Louisiana

Citizens Insurance and the agents' network, Louisiana Citizens Insurance will not be able to completely process all applications by June 22, 2022.

6.

Therefore, in an effort to avoid during hurricane season a lapse or a gap in the insurance coverage of thousands of Louisiana homeowners, the Commissioner respectfully requests an extension of the current insurance policy cancellation date for a period of nine (9) days, or from June 22, 2022, at 12:01 a.m. CST, until July 1, 2022, at 12:01 a.m. CST, and that the Lighthouse Excalibur Liquidation Order be amended to require as follows:

- (a) All insurance policies issued by Lighthouse Excalibur Insurance in the state of Louisiana are cancelled upon the earlier of (i) thirty-nine (39) days after the May 23, 2022-date the Order of Liquidation was entered, at 12:01 a.m. local time of the insured or policyholder of such direct policy or certificate of insurance; (ii) the expiration date of any such direct policy and/or certificate of insurance for which timely notice was given by Lighthouse Excalibur Insurance, if the expiration date is sooner than thirty-nine (39) days after the entry of the Order of Liquidation on May 23, 2022; or (iii) the date the insured or policyholder of any such direct policy and/or certificate of insurance replaces the direct policy and/or certificate of insurance, or effects cancellation, if the insured or policyholder does so within thirty-nine (39) days after the entry of the Order of Liquidation on May 23, 2022; and,
- (b) All executory contracts of Lighthouse Excalibur Insurance may be enforced, cancelled or modified by the Liquidator or Receiver in their discretion or as otherwise ordered by this Court.

WHEREFORE, James J. Donelon, Commissioner of Insurance for the State of Louisiana, as Liquidator of Lighthouse Excalibur Insurance Company, through his delegated and court-appointed Receiver, Billy J. Bostick, prays that this Court grant this motion and issue an order extending the time of cancellation of the Louisiana Policies of Lighthouse Excalibur Insurance Company as requested herein.

Respectfully submitted,

Taylor, Porter, Brooks & Phillips L.L.P.

By WILLIAM

John Ashley Moore LBRN 09635 Edward D. Hughes, LBRN 28617 John M. Parker, Jr., LBRN 32629 Michael A. Grace, LBRN 38240 William H. Patrick, IV, LBRN 38862

450 Laurel Street, 8th floor (70801)

P.O. Box 2471

Baton Rouge, LA 70821-2471 Telephone: (225) 387-3221 Facsimile: (225) 346-8049

Email: ashley.moore@taylorporter.com
Email: eddie.hughes@taylorporter.com
Email: michael.grace@taylorporter.com
Email: will.patrick@taylorporter.com

Attorneys for the Liquidator and Receiver of Lighthouse Excalibur Insurance Company

JEFF LANDRY, ATTORNEY GENERAL

Michael Guy, LBRN 25406 Assistant Attorney General 1885 North Third Street P.O. Box 94005

Baton Rouge, LA 70804-9005 Telephone: (225) 326-6174 Email: guym@ag.louisiana.gov

Attorney for James J. Donelon, Commissioner of Insurance for the State of Louisiana

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing MOTION FOR ORDER EXTENDING TIME OF CANCELLATION OF LOUISIANA POLICIES OF LIGHTHOUSE EXCALIBUR INSURANCE COMPANY UNTIL JULY 1, 2022, AT 12:01 A.M. CST was

this day sent via electronic mail and/or facsimile to all counsel of record, as follows:

Ms. Stephanie B. Laborde Lafleur Laborde LLC 6160 Perkins Road, Ste. 225 Baton Rouge, LA 70808 Telephone: (225) 230-0484 Facsimile: (800) 430-2378

Email: slaborde@lalalawfirm.com

Mr. Ronnie L. Johnson McGlinchey Stafford PLLC Three Energy Square 6688 North Central Expressway, Suite 400

Dallas, TX 75206 Telephone: (214) 445-2438 Facsimile: (225) 612-7065

Email: rjohnson@mcglinchey.com

Mr. Rudy Aguilar McGlinchey Stafford PLLC 301 Main Street, Suite 1400 Baton Rouge, LA 70801 Telephone: (225) 382-3625 Facsimile: (225) 382-3625

Email: rudyaguilar@mcglinchey.com

Mr. Covert J. Geary Jones Walker LLP 201 St. Charles Ave. New Orleans, LA '70170-5100 Telephone: (504) 582-8276

Facsimile: (504) 589-8276 Email: cgeary@joneswalker.com

Mr. James C. Percy

Mr. Henry "Hank" Rauschenberger Mr. Eric P. Morvant

Jones Walker LLP 445 North Blvd., Suite 800 Baton Rouge, LA 70802 Telephone: (225) 248-2000

Facsimile: (225) 248-2010

Email: jpercy@joneswalker.com Email: <u>hrauschenberger@joneswalker.com</u>

Email: emorvant@joneswalker.com

Mr. Brian D. Glueckstein Sullivan & Cromwell LLP

125 Broad Street

New York, NY 10004-2498 Telephone: (212) 558-4000 Facsimile: (212) 558-3588

Email: gluecksteinb@sullcrom.com

Baton Rouge, Louisiana, this

19TH JUDICIAL DISTRICT COURT STATE OF LOUISIANA

PARISH OF EAST BATON ROUGE

JAMES J. DONELON, COMMISSIONER OF INSURANCE FOR THE STATE OF LOUISIANA NUMBER: 717,274

SECTION: 26

Plaintiff,

Versus

LIGHTHOUSE HOLDINGS GROUP,
LLC, LIGHTHOUSE PROPERTY
INSURANCE CORPORATION,
LIGHTHOUSE EXCALIBUR
INSURANCE COMPANY, DIMINO
HOLDINGS GROUP, LLC, TWIMG,
LLC, LIGHTHOUSE MANAGEMENT,
LLC, LIGHTHOUSE MANAGERS
GROUP, LLC, LIGHTHOUSE
MANAGING AGENT SERVICES, LLC,
PREPARED MANAGERS, LLC, and
LIGHTHOUSE GULFCOAST
MANAGEMENT, LLC

Defendants

ORDER EXTENDING TIME OF CANCELLATION OF LOUISIANA POLICIES OF LIGHTHOUSE EXCALIBUR INSURANCE COMPANY UNTIL JULY 1, 2022, AT 12:01 A.M. CST

Considering the Motion for Order Extending Time of Cancellation of Louisiana Policies of Lighthouse Excalibur Insurance Company Until July 1, 2022, at 12:01 a.m. CST, filed by James J. Donelon, Commissioner of Insurance for the State of Louisiana ("Commissioner" or "Liquidator"), in his capacity as Liquidator of Lighthouse Excalibur Insurance Company ("Lighthouse Excalibur Insurance"), through his delegated and court-appointed Receiver, Billy J. Bostick, and for good cause shown:

IT IS ORDERED, ADJUDGED, AND DECREED that the Liquidator and Receiver's motion is GRANTED; an Order Extending the Time of Cancellation of the Louisiana Policies of Lighthouse Excalibur Insurance until July 1, 2022, at 12:01 a.m. CST., is hereby entered;

IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that the Lighthouse Excalibur Insurance Liquidation Order entered on May 23, 2022, is amended and the Louisiana

homeowners' insurance policies issued by Lighthouse Excalibur Insurance shall be cancelled as follows:

- (a) All insurance policies issued by Lighthouse Excalibur Insurance in the state of Louisiana are cancelled upon the earlier of (i) thirty-nine (39) days after the May 23, 2022-date the Order of Liquidation was entered, at 12:01 a.m. local time of the insured or policyholder of such direct policy or certificate of insurance; (ii) the expiration date of any such direct policy and/or certificate of insurance for which timely notice was given by Lighthouse Excalibur Insurance, if the expiration date is sooner than thirty-nine (39) days after the entry of the Order of Liquidation on May 23, 2022; or (iii) the date the insured or policyholder of any such direct policy and/or certificate of insurance, or effects cancellation, if the insured or policyholder does so within thirty-nine (39) days after the entry of the Order of Liquidation on May 23, 2022; and,
- (b) All executory contracts of Lighthouse Excalibur Insurance may be enforced, cancelled or modified by the Liquidator or Receiver in their discretion or as otherwise ordered by this Court.

IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that all provisions set forth in this Court's prior orders issued in this proceeding, including the Order of Rehabilitation issued April 5, 2022, and the Lighthouse Excalibur Insurance Liquidation Order entered on May 23, 2022, shall remain in full force and effect to the extent they do not conflict with this Order Extending the Time of Cancellation of Louisiana Policies of Lighthouse Excalibur Insurance Company, or Louisiana law governing the liquidation of insurers.

SO ORDERED, READ AND SIGNED at Baton Rouge, Louisiana, this 20 day of June, 2022.

Honorable Richard "Chip" Moore, III Judge, 19th Judicial District Court

Order submitted by:
By Attorneys,
TAYLOR, PORTER, BROOKS & PHILLIPS L.L.P.
John Ashley Moore (LBRN 09635)
450 Laurel Street, 8th floor (70801)
P.O. Box 2471
Baton Rouge, Louisiana 70821
Telephone: (225) 381-0218

Telephone: (225) 381-0218 Facsimile: (225) 346-8049

Email: ashley.moore@taylorporter.com

THIS ORDER IS ISSUED IN CONNECTION WITH THE MOTION FOR ORDER EXTENDING TIME OF CANCELLATION OF LOUISIANA POLICIES OF LIGHTHOUSE EXCALIBUR INSURANCE COMPANY UNTIL JULY 1, 2022, AT 12:01 A.M. CST