

IN THE CHANCERY COURT OF THE STATE OF TENNESSEE  
TWENTIETH JUDICIAL DISTRICT, DAVIDSON COUNTY

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CHLORA A. LINDLEY-MYERS )  
SPECIAL DEPUTY COMMISSIONER OF )  
COMMERCE AND INSURANCE FOR )  
THE STATE OF TENNESSEE, )

Petitioner, )

v. )

No. 10-507-III

SMART DATA SOLUTIONS, LLC )  
a Tennessee limited liability company, )  
AMERICAN TRADE ASSOCIATION, )  
INC, an Indiana nonprofit corporation with )  
its principal place of business in Tennessee, )  
AMERICAN TRADE ASSOCIATION, )  
LLC, an Arkansas limited liability company, )  
SERVE AMERICA ASSURANCE, )  
a corporation with an unknown location, )  
BART S. POSEY SR., ANGIE POSEY )  
OBED W. KIRKPATRICK, RICHARD )  
H. BACHMAN, WILLIAM M. WORTHY )  
and COLIN YUELL, )

Respondents. )

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**MOTION FOR APPROVAL OF (1) THE LIQUIDATOR’S REPORT ON CLAIMS;  
(2) THE FINAL DISTRIBUTION OF SDS/ATA/SAA ESTATE ASSETS  
TO CLASS 2 CLAIMANTS; AND (3) DISCHARGE OF THE LIQUIDATOR**

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Chlora A. Lindley-Myers in her capacity as Special Deputy Commissioner of Commerce and Insurance for this receivership matter and as Statutory Liquidator of Smart Data Solutions, LLC (“SDS”), American Trade Association, Inc., American Trade Association, LLC (collectively referred to as “ATA”), and Serve America Assurance (“SAA”), along with her appointed Special Deputy Liquidator Jeanne Barnes Bryant, moves the Court for an order to

approve, pursuant to Tenn. Code Ann. § 56-9-331, the Liquidator's report and recommendation on the valuation of claims (Exhibit 1 to the Affidavit of Special Deputy Liquidator Bryant filed contemporaneously herewith). Additionally, the Liquidator respectfully requests that the Court authorize the Special Deputy Liquidator, pursuant to Tenn. Code Ann. § 56-9-332, to distribute approximately \$806,450.00 of the SDS/ATA/SAA estate assets to pay the approved Class 2 claims totaling approximately \$7,331,339.00 by making a pro rata final distribution at the rate of approximately 11.00% of the total approved Class 2 claim amount.

Upon making the final distribution, all assets of the SDS/ATA/SAA estate justifying the expense of collection and distribution will have been distributed, and thus, the Liquidator further requests that the Court enter an order directing the Liquidator, upon completion of the closure activities set forth in this Motion, to submit a Notice and Final Order of Discharge to terminate the receivership and discharge the Liquidator pursuant to Tenn. Code Ann. § 56-9-334(a).

An affidavit of Special Deputy Liquidator Jeanne Barnes Bryant in support of this Motion has been filed contemporaneously herewith and is incorporated herein by reference. Additionally, in support of this Motion, the Liquidator states that, based on the following, the receivership estate assets are ready to be distributed, and then the receivership is ready to be closed.

1. On May 20, 2010, the Court entered the Final Order of Liquidation ("Liquidation Order"), which appointed the Commissioner of Commerce and Insurance as the Liquidator of SDS, ATA, and SAA and authorized the Commissioner to pursue asset recovery and liquidation.<sup>1</sup>

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<sup>1</sup> Certain respondents appealed the Court's Final Order of Liquidation to the Tennessee Court of Appeals. The Liquidation Order was not stayed during the appeal. On June 3, 2011, the Court of Appeals issued its opinion affirming the judgment of the Chancery Court. *See Newman v. Smart Data Solutions, LLC*, 2011 WL 2347574 (Tenn. Ct. App. June 3, 2011).

2. On February 3, 2012, Chlora A. Lindley-Myers, the then-Insurance Process and Implementation Director of the Department of Commerce and Insurance, was appointed by Governor Haslam as the Special Deputy Commissioner of Commerce and Insurance to act for all purposes as the Petitioner, Statutory Liquidator, and Commissioner in the Liquidation of SDS, ATA, and SAA.

3. Pursuant to Tenn. Code Ann. § 56-9-310(a)(1), the Liquidator appointed Jeanne Barnes Bryant to serve as Special Deputy Liquidator for SDS, ATA, and SAA effective January 29, 2013.

4. Pursuant to the Final Liquidation Order, the Court established August 31, 2010 as the deadline for filing Proofs of Claim in the SDS/ATA/SAA receivership. The Liquidator received over 12,800 Proofs of Claim for health benefits, premium refunds, and non-policy related charges with the total claimed amount exceeding \$40 million.<sup>2</sup>

5. The Liquidator has issued Notices of Determination for the over 12,800 Proofs of Claim (some of which contained hundreds of claims) to establish the Liquidator's determined claim amounts and statutory classifications for payment priority pursuant to Tenn. Code Ann. §56-9-330. All of the objections to the Liquidator's Notices of Determination have been resolved pursuant to Tenn. Code Ann. § 56-9-331 and § 56-9-327, and at this time, all of the determinations for the Proofs of Claim are final.

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<sup>2</sup> Based on opposition filed by the respondents, the Court ordered on September 27, 2010, that no notices of determination pursuant to Tenn. Code Ann. § 56-9-331 & § 56-9-327 were to be issued by the Liquidator. As directed by the Court, the Liquidator provided the respondents with information about the Liquidator's approach for processing proofs of claim. No one responded or filed an objection with the Court. As a result, the Liquidator moved the Court on October 7, 2011 for an order allowing the Liquidator to issue notices of determination, adjudicate the claims, and submit the report on claims to the Court. The Court entered an order authorizing the Liquidator to begin issuing notices of determination on November 7, 2011. On April 1, 2013, the Court entered an order establishing the absolute claims bar date of March 29, 2013, for receipt of claims against the SDS/ATA/SAA receivership, after which the Liquidator does not have to recognize any claims even as Class 7 late-filed claims. The Special Deputy Liquidator will mail a letter to anyone who has submitted a claim after the absolute bar date, explaining that the claim is barred by order of the court.

6. As explained further below, the final liability amount of the approximately 8,000 Class 2 policy-related Proofs of Claim is approximately \$7,331,339.00. The other classes of claims (i.e., the Class 5 unearned premium refund claims and general creditor claims, the Class 6 state and local government claims, and the Class 7 late-filed claims) have only been assigned a statutory classification pursuant to Tenn. Code Ann. § 56-9-330 and have been valued at zero (0) since there are not enough estate assets to pay the Class 2 claimants in full pursuant to Tenn. Code Ann. § 56-9-330.

7. **Liquidator's Report and Recommendation For Claims Pursuant to Tenn. Code Ann. § 56-9-331:** The Special Deputy Liquidator has set forth the final value of all known Class 2 claims in Exhibit 1 to the Affidavit of Special Deputy Liquidator Bryant that is being filed contemporaneously herewith.<sup>3</sup> The final values presented in Exhibit 1 as the "NOD POC Value" were established and resolved through the statutory process set forth in Tenn. Code Ann. § 56-9-331 and § 56-9-327. The Liquidator is submitting this report and recommendation for claims (Exhibit 1) to the Court for approval pursuant to Tenn. Code Ann. § 56-9-331.

8. **Marshalling Assets:** The Liquidator has engaged in extensive asset recovery actions that have resulted in substantial recoveries and in numerous lawsuits being filed.<sup>4</sup> The Liquidator is submitting contemporaneously herewith filings to dismiss without prejudice all

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<sup>3</sup> As explained in this Motion, there are not enough estate assets to pay the approved value of the Class 2 claims in full, so the claims of lower payment priority (i.e., the Class 5, 6, and 7 claims) have only been assigned a statutory classification pursuant to Tenn. Code Ann. § 56-9-330 and have been valued at zero (0). This prevented the receivership from incurring the unnecessary expense of valuing claims for which there are no assets to pay. Since these claims have been valued at zero (0), they are not included in the Class 2 claims report being presented to the Court for approval. Over 1,000 Notices of Determination were sent to Class 7 late-filed claimants. Approximately 375 Notices of Determination were sent to members who were solely requesting a refund of unearned premiums to establish the Class 5 statutory payment priority of their claims. Approximately eleven (11) Notices of Determination were sent in response to claims from Class 5 general creditors. Approximately two (2) Notices of Determination were sent in response to claims from Class 6 state government claimants. The Liquidator's determinations as to these claims are final.

<sup>4</sup> See Notice of Filing Financial Reports of SDS, ATA, and SAA in Liquidation for the Third and Fourth Quarters of 2012, Exhibit 1, at n.10 & n.11 (filed March 8, 2013) (explaining the numerous actions and resulting recoveries).

remaining claims in the remaining third party recovery actions filed in this receivership.<sup>5</sup> Based on the Special Deputy Liquidator's recommendation, the Liquidator has determined that, pursuant to Tenn. Code Ann. § 56-9-310(a)(14), it would be unprofitable at this time to continue to prosecute these third party recovery actions and continue to incur administrative expenses. Rather, it would be more beneficial and profitable to proceed with distributing the final estate assets of the receivership and closing the receivership.

9. **Final Distribution to Class 2 Claimants:** The Liquidator, pursuant to her statutory authority, has determined that all of the known estate assets that are available and/or profitable to pursue have been marshaled into the estate and should be distributed at this time pro rata to the approved Class 2 claimants pursuant to Tenn. Code Ann. § 56-9-332 & § 56-9-330. This Motion sets forth the proposed amount of the final distribution after the anticipated amount for the remaining Class 1 administrative expenses through closure has been withheld.

10. The SDS/ATA/SAA estate currently has approximately \$896,969.00 in total net assets. *See* Bryant Aff., Exhibit 2 (filed contemporaneously herewith).

11. The total amount of all approved Class 2 claims is approximately \$7,331,339.00. *See* Bryant Aff., Exhibit 2 (filed contemporaneously herewith).

12. The Special Deputy Liquidator on behalf of the Liquidator estimates that \$90,519.00 will be needed to cover Class 1 administrative expenses through the closure of the receivership, leaving \$806,450.00 available for distribution to Class 2 claimants using a pro rata percentage of approximately 11.00% of the total approved Class 2 claim amount.<sup>6</sup> It is possible

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<sup>5</sup> The Liquidator is seeking to dismiss without prejudice the remaining claims in the petition for recovery of damages filed against Bart S. Posey, Sr., and Angie Posey, in the petition for recovery of damages filed against William M. Worthy, II, and in the petition for recovery of damages filed against Donald Choi.

<sup>6</sup> Exhibit 2 to the Affidavit of Special Deputy Liquidator Bryant (filed contemporaneously herewith) sets forth the estimated administrative expenses through closure of the receivership and the amount of estate assets available for distribution.

that certain costs may be reduced prior to making the final distribution, and any such cost savings achieved prior to making the final distribution will be included in the final distributions, resulting in de minimis increases in the pro rata distribution amounts by a couple of pennies or cents. Exhibit 1 to the Affidavit of Special Deputy Liquidator Jeanne Barnes Bryant (filed contemporaneously herewith) sets forth the amount of the proposed final distribution to be made at a minimum to each Class 2 claimant.

13. The proposed final distribution ensures that each Class 2 claimant will receive the same pro rata distribution and that no subclasses will be created within Class 2 as required by Tenn. Code Ann. § 56-9-330.

14. At this time, Class 2 claims will not be paid in full. Thus, any claims below Class 2 in payment priority (i.e., Class 5, 6, and 7 claims) will not receive any distributions or any further notice.

15. **Closure of Receivership:** Pursuant to Tenn. Code Ann. § 56-9-334(a), all assets of the SDS/ATA/SAA estate justifying the expense of collection and distribution will be distributed upon the Court's approval of this Motion. Thus, the Liquidator requests that the Special Deputy Liquidator be authorized to perform the closure activities described in paragraphs 16 through 22 in this Motion. Upon completion of these closure activities, the Liquidator will submit a Notice and Final Order of Discharge for entry by the Court.

16. **Unclaimed Property:** If there are any uncashed checks at least sixty (60) days after the Special Deputy Liquidator makes the final distributions proposed in this Motion, the Liquidator respectfully requests that, pursuant to Tenn. Code Ann. § 56-9-333(a), the Special Deputy Commissioner be allowed either to transfer any unclaimed funds to the Unclaimed Property Division of the State Treasurer or to elect, without further court order, to hold the

unclaimed funds for a period of two (2) years, and if such funds remain unclaimed at the end of the two-year period, to hold and deposit the funds without further court order in the closed estate no asset fund for the purpose of defraying the costs and expenses of the administration of other insolvent insurers for which there are insufficient assets to fund the costs and expenses of administration of a receivership pursuant to Tenn. Code Ann. §§ 56-9-101, *et seq.* The Liquidator will explain how she has determined to handle any unclaimed property in the Notice and Final Order of Discharge that the Liquidator will file upon completion of the closure activities.

17. **Destruction of Records:** The Special Deputy Liquidator will notify the U.S. Attorney's Office and the Tennessee Attorney General's office about this request to destroy documents and will offer for these agencies to take possession of and/or copy any of the SDS/ATA/SAA company records that they may need for any investigations and/or upcoming trials. The Special Deputy Liquidator will provide these agencies with any requested documents prior to closure. The Liquidator has determined that there is no benefit to the receivership to incurring any additional costs of maintaining the records that are in the Liquidator's possession, custody, or control once the final distributions have been made and the closure activities have been performed except to maintain necessary records for tax purposes for three (3) years. Therefore, the Liquidator respectfully requests, pursuant to Tenn. Code Ann. § 56-9-336, that the Court order any remaining documents that are in the Liquidator's possession, custody, or control and are being maintained for tax purposes to be destroyed three (3) years after the entry of the Court's Order approving this Motion and that the Court order all other records to be destroyed by the receivership prior to the Liquidator filing notice with the Court that all closure activities have been completed. In the event that it is determined that any records not necessary for tax purposes

must be maintained by the State, these records will be transferred to the State for storage without cost to the receivership. The Liquidator will explain to the Court whether these records have been destroyed or transferred to the State in the Notice and Final Order of Discharge that the Liquidator will file upon completion of the closure activities.

18. **Payment of Class 1 Administrative Expenses and Approval Through Closure:** The Court has approved, pursuant to Tenn. Code Ann. § 56-9-310(a)(4), the Liquidator's determination to pay from the receivership estate the Class 1 administrative fees of the Special Deputy Liquidator, outside legal counsel, and third party contractors through March 31, 2014.

19. The Liquidator estimates that administrative fees and expenses to be incurred through the final discharge of the Liquidator, assuming that no unexpected events occur, will be approximately \$90,519.00. An itemized list of the estimated fees and expenses is attached as Exhibit 2 to the Affidavit of Special Deputy Liquidator Bryant (filed contemporaneously herewith).<sup>7</sup> It is possible that certain estimated expenses, such as the records storage fees and bank charges for checks, could be determined prior to making the final distribution to be less than the estimated amounts included in Exhibit 2 to the Affidavit of Special Deputy Liquidator Bryant (filed contemporaneously herewith). If this occurs, the Liquidator will include the cost savings in the final distribution amount to be made pro rata to the Class 2 claimants which will increase the claimants' distribution amounts pro rata by a couple of pennies or cents. The

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<sup>7</sup> These estimated expenses do not include the costs to maintain the Metro Center Post Office Box and the Springfield Post Office Box. The Special Deputy Liquidator has determined that it is no longer necessary to incur the costs to maintain the Springfield Post Office Box, which was solely being maintained pursuant to the February 4, 2011 Agreed Order. The correspondence that has been issued by the receivership since early 2013 has contained the current contact information for Receivership Management, Inc. ("RMI"), which is Special Deputy Bryant's office. The SDS/ATA/SAA Liquidation website will not be renewed after its expiration on July 31, 2014, and during this limited time, the website will re-route viewers to the RMI website ([www.receivermgmt.com](http://www.receivermgmt.com)) for future information and inquiries. Special Deputy Bryant plans to include the RMI website on all future correspondence regarding the final distribution and closure of the receivership.



distribution amounts presented in Exhibit 1 to the Affidavit of Special Deputy Liquidator Bryant are the minimum amounts that the Class 2 claimants may receive.

20. The actual fees of the Special Deputy Liquidator, outside counsel, and third party contractors incurred through the closure of the receivership will be submitted to the Liquidator and her staff for review and approval in accordance with the Department's administrative guidelines pursuant to Tenn. Code Ann. § 56-9-310(a)(4). Only the actual fees that are determined by the Liquidator upon proper review to be reasonable will be approved and paid by the Liquidator from the SDS/ATA/SAA estate. The Liquidator requests that the Class 1 administrative fees of the Special Deputy Liquidator, outside legal counsel, and third party contractors through the closure of the receivership that the Liquidator determines upon proper review to be reasonable and payable be deemed approved by the Court pursuant to Tenn. Code Ann. § 56-9-310(a)(4), and that no further fee motions be required by the Court.

21. After the final distribution is made, if the actual Class 1 administrative expenses incurred through closure are less than the estimated amount set forth in Exhibit 2 to the Affidavit of Special Deputy Liquidator Bryant (filed contemporaneously herewith), the Liquidator requests that, pursuant to Tenn. Code Ann. § 56-9-334(a), any remaining monies in the estate be transferred to the closed estate no asset fund maintained at the direction of the Commissioner of the Tennessee Department of Commerce and Insurance pursuant to Tenn. Code Ann. § 56-9-333(a) to assist with administrative expenses of receiverships that lack sufficient assets to fund administrative costs of proceedings under the Tennessee Rehabilitation and Liquidation Act, §§ 56-9-101, *et seq.*

22. **Taxes:** Tax returns through tax year 2013 have been filed with the Internal Revenue Service ("IRS"). The 2014 tax returns will be filed as soon as possible after the final

distribution checks are issued assuming this Motion is granted. Additionally, the Special Deputy Liquidator will cause the IRS Form 1099 to be mailed to each person who receives a reportable payment from the SDS/ATA/SAA receivership in 2014.

23. Because of the huge number of claimants and the prohibitive expense of mailing notice of the Liquidator's request to make the final distributions to each claimant, the Special Deputy Liquidator will cause this Motion and her Affidavit along with its Exhibits (filed contemporaneously herewith) to be posted on the Liquidation's website and the Receivership Management, Inc.'s ("RMI") website ([www.receivermgmt.com](http://www.receivermgmt.com)). The Special Deputy Liquidator will also mail letters explaining the distribution to the Class 2 claimants along with the 2014 final distribution checks.

24. This Motion seeks relief that will be relied upon in making the final distribution to approved Class 2 claimants and closing the receivership and discharging the Liquidator. To provide certainty regarding the relief granted, the Liquidator requests that, pursuant to Tenn. R. Civ. P. 54.02, the Court expressly find that there exists no just reason for delay and that any Order granting this motion be entered as final regarding the matter addressed in that Order.

NOW, THEREFORE, for the foregoing reasons, the Liquidator respectfully requests that the Court enter an order granting this Motion and:

1. Approving, pursuant to Tenn. Code Ann. § 56-9-331, the Liquidator's report and recommendation on Class 2 claims, totaling approximately \$7,331,339.00, set forth in Exhibit 1 to the Affidavit of Special Deputy Liquidator Jeanne Barnes Bryant (filed contemporaneously herewith);
2. Authorizing the Liquidator, pursuant to Tenn. Code Ann. § 56-9-332, to make a final distribution of at a minimum approximately \$806,450.00 pro rata to the

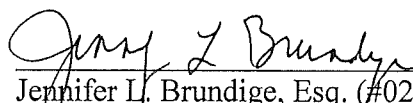
approved Class 2 claimants (which is approximately an 11.00% pro rata final distribution of each approved Class 2 claim amount) as set forth in Exhibit 1 to the Affidavit of Special Deputy Liquidator Jeanne Barnes Bryant (filed contemporaneously herewith);

3. Authorizing the Liquidator to reserve approximately \$90,519.00 to pay the final administrative costs necessary to close the Liquidation;
4. Approving, pursuant to Tenn. Code Ann. § 56-9-310(a)(4), the Liquidator's payment of all Class 1 administrative fees and expenses for the Special Deputy Liquidator, outside legal counsel, and third party contractors to perform the final distribution and closure activities set forth in this Motion that the Liquidator determines to be reasonable and payable after the proper administrative review, and requiring no additional fee motions to be filed with the Court;
5. Ordering the Liquidator to pay all remaining court costs in this case;
6. Authorizing, after the payment of the final distribution and all Class 1 administrative expenses and fees, the transfer, pursuant to Tenn. Code Ann. § 56-9-334(a), of any remaining estate assets to the closed estate no asset fund maintained at the direction of the Commissioner of the Tennessee Department of Commerce and Insurance pursuant to Tenn. Code Ann. § 56-9-333(a);
7. Allowing the Special Deputy Commissioner either to transfer any unclaimed funds to the Unclaimed Property Division of the State Treasurer or without further court order to elect to hold any unclaimed funds for a period of two (2) years and at the end of the two-year period to hold and deposit the funds in the closed estate no asset fund pursuant to Tenn. Code Ann. § 56-9-333(a);

8. Authorizing the Liquidator, pursuant to Tenn. Code Ann. § 56-9-336, to destroy the records of the receivership that are being maintained for tax purposes three (3) years after entry of the Court's Order granting this Motion and to either destroy or transfer to the State for storage at no cost to the receivership all other records prior to the Liquidator filing notice with the Court that all closure activities have been completed;
9. Ordering, upon completion of the closure activities set forth in this Motion, the Liquidator to file Notice and Final Order of Discharge with the Court that will terminate the SDS/ATA/SAA receivership and discharge the Liquidator, along with her staff and current and prior statutory receivers and special deputy receivers, finally and fully from all duties as the Liquidator of the SDS/ATA/SAA receivership pursuant to Tenn. Code Ann. § 56-9-334(a); and
10. Finding that there is no just reason for delay and instructing the Clerk and Master to enter any Order granting this Motion as final regarding all matters addressed therein pursuant to Tenn. R. Civ. P. 54.02.

Respectfully submitted,

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*Special Counsel for the Liquidator and Special  
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**THIS MOTION IS SET TO BE HEARD ON FRIDAY, JULY 11, 2014, AT 9:00 A.M. OR AS SOON THEREAFTER AS IT MAY BE HEARD. IF NO RESPONSE IS TIMELY FILED AND SERVED, THE MOTION SHALL BE GRANTED WITHOUT FURTHER HEARING.**

**CERTIFICATE OF SERVICE**

I hereby certify this the 27<sup>th</sup> day of June, 2014, that a true and exact copy of the foregoing has been served by U.S. mail, postage pre-paid, and/or via email as indicated, to the parties and interested entities listed on the attached service list.

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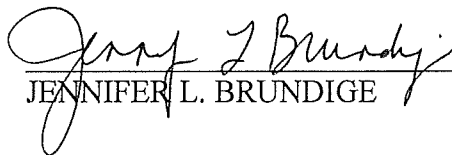
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