COMMONWEALTH OF VIRGINIA STATE CORPORATION COMMISSION

COMMONWEALTH OF VIRGINIA	§	
	§	
At the relation of the	§	
	§	
STATE CORPORATION COMMISSION,	§	
	§	
V.	§	Case No. INS-2011-00239
	§	
SOUTHERN TITLE INSURANCE	§	
CORPORATION, Defendant.	§	

APPLICATION TO PRACTICE PRO HAC VICE

Jacqueline K. Cunningham, Commissioner of Insurance, Bureau of Insurance, State Corporation Commission of the Commonwealth of Virginia, as Deputy Receiver of Southern Title Insurance Corporation (the "Company"), respectfully requests that Andrea L. Bos, Kristen W. Johnson, Joshua O. Lively, Jose M. Rangel (collectively referred to as "Applicants") be permitted to practice *pro hac vice* in the above-entitled case.

- 1. On December 20, 2011, the Circuit Court of the City of Richmond entered its Final Order Appointing Receiver for Rehabilitation or Liquidation in which it appointed the State Corporation Commission of the Commonwealth of Virginia (the "Commission") as the Receiver of the Company.
- 2. Also on December 20, 2011, the Commission entered its Order Appointing Deputy Receiver for Conservation and Rehabilitation, appointing Jacqueline K. Cunningham, the Commissioner of the Commission's Bureau of Insurance, as Deputy Receiver (the "Deputy Receiver").
 - 3. The Applicants are attorneys who represent the Deputy Receiver.
 - 4. All the Applicants are members in good standing of the State Bar of Texas.

5. The Applicants are members in good standing of various bars ranging from the

District Courts of the United States to the Circuit Courts of Appeal of the United States.

6. The Applicants are integrally involved in the daily affairs of the Company and the

ongoing efforts to develop a workable plan of rehabilitation or liquidation for the Company.

Accordingly, the Deputy Receiver requests that the Applicants be admitted to practice before the

Commission in order to represent the Deputy Receiver for this case and all cases before the

Commission related to the receivership of the Company.

7. The Applicants will abide by all Rules of Practice and Procedure of the Commission

and will conduct themselves as other attorneys admitted to practice before the Commission.

WHEREFORE, premises considered, the Deputy Receiver and Applicants request that the

Applicants be admitted pro hac vice to represent the Deputy Receiver in this matter.

Respectfully submitted,

Jacqueline K. Cunningham, Commissioner of Insurance, Bureau of Insurance, State Corporation Commission,

Commonwealth of Virginia, and Deputy Receiver of Southern Title Insurance Corporation

By:

Donald C. Beatty

Donald C. Beatty, Senior Counsel

STATE CORPORATION COMMISSION

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