

FILED IN DISTRICT COURT
OKLAHOMA COUNTY

IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

MAR 26 2025

RICK WARREN
COURT CLERK

136

STATE OF OKLAHOMA, ex rel.
GLEN MULREADY, Insurance
Commissioner,

Plaintiff,

v.

UNION MUTUAL INSURANCE
COMPANY, a licensed mutual
insurance company in the State of
Oklahoma,

Defendant.

Case No. CJ-2025-

2010

**AGREED ORDER PLACING UNION MUTUAL INSURANCE COMPANY INTO
RECEIVERSHIP, APPOINTING RECEIVER, GRANTING INJUNCTIVE RELIEF,
AND CONSENT THERETO**

NOW on this 26th day of March, 2025, there comes before this Court the Application for Order Placing Union Mutual Insurance Company into Receivership, Appointing Receiver, and Issuing Injunction ("Application"). Plaintiff, Glen Mulready, Insurance Commissioner, appears by and through counsel for the Oklahoma Insurance Department. Defendant Union Mutual Insurance Company ("UMIC") waives service of process and appears through its Chief Executive Officer and Michael Ridgeway of the law firm of MWR PLLC, Norman, Oklahoma.

The Court, having examined the Application filed on March 26th, 2025, and agreed to by Plaintiff and Defendant, finds as follows:

1. Glen Mulready is the duly elected and acting Insurance Commissioner of the State of Oklahoma and, as such, is charged with the duty of administering and enforcement of the Oklahoma Insurance Code. Okla. Const. art. VI, § 22; 36 O.S. § 307. Pursuant to 36 O.S. § 1905,

the Insurance Commissioner may appear in the District Court to make an application for an order appointing the Insurance Commissioner as receiver ("Receiver").

2. This Court has exclusive jurisdiction of this action pursuant to 36 O.S. § 1902(A).

3. Venue in this Court is appropriate pursuant to 36 O.S. § 1902(F).

4. UMIC is an Oklahoma mutual insurance company, whose business is subject to the Insurance Commissioner placing it into receivership pursuant to Article 19 of the Oklahoma Insurance Code. See 36 O.S. § 1901(2).

5. Receiver includes liquidator, rehabilitator, and conservator. See 36 O.S. § 1901(13).

6. Pursuant to 36 O.S. § 1905, Glen Mulready, the Insurance Commissioner, and any successor, should be appointed as the Receiver of UMIC because UMIC has consented to such an order through a majority of its directors, stockholders, members or subscribers.

7. The Board of UMIC resolved in Written Consent in lieu of Meeting of the Board of Directors on March 25, 2025, to consent to the entry of this order placing UMIC into receivership, appointing the Oklahoma Insurance Commissioner as receiver of UMIC, and issuing a permanent injunction.

8. UMIC has on deposit with the State of Oklahoma through the Insurance Commissioner a security deposit.

9. On March 26th, 2025, Insurance Commissioner submitted the Application for an order placing UCRRG into receivership and appointing the Insurance Commissioner as receiver in accordance with 36 O.S. § 1905.

10. Sufficient cause and evidence exist for the entry of this Agreed Order Placing Union Mutual Insurance Company Into Receivership, Appointing Receiver, Granting Injunctive Relief, and Consent Thereto against Defendant UMIC ("Agreed Order").

IT IS THEREFORE ORDERED AND DECREED, AND THE PARTIES AGREE THAT:

11. UMIC has consented to this Agreed Order through a majority of its directors, members or subscribers and, as such, subject to receivership pursuant to 36 O.S. § 1905(9).

12. UMIC is hereby placed into receivership pursuant to 36 O.S. §§ 1901, et seq.

13. Glen Mulready, Insurance Commissioner of the State of Oklahoma, and any successor, is hereby appointed Receiver of UMIC and presently directed to rehabilitate UMIC pursuant to the laws of the State of Oklahoma.

14. The Receiver is vested with all powers and authority, express or implied, under the provisions of 36 O.S. §§ 1901, et seq.

15. Pursuant to the provisions of 36 O.S. § 1914, the Receiver shall forthwith take possession of all the property, contracts, rights of action, and all of the books and records of UMIC, wherever located, as of the date of this Order. The Receiver shall, subject to the direction of this Court, immediately proceed to conduct the business of UMIC.

16. The Receiver is vested by operation of law to assert and prosecute common claims on behalf of policyholders and creditors of the estate.

17. As provided by 36 O.S. § 1914(F), Donna Wilson is hereby appointed Assistant Receiver of UMIC and vested with all responsibilities and powers given to the Receiver. The Insurance Commissioner's appointment of a law firm as counsel for the Receiver is hereby approved. The compensation of the assistant commissioner or receivers, counsel, clerks, or

deputies and all expenses of taking possession of UMIC and of conducting the proceedings, including the compensation from this date forward, shall be fixed by the Insurance Commissioner, as Receiver, subject to approval of this Court, and shall be paid out of the funds or assets of UMIC, as appropriate and approved by the Court. It is further ordered that the Riggs Abney law firm be appointed as Counsel for the Receiver.

18. Pending the Receiver's first application to the Court for approval of administrative fees and expenses, the Receiver is authorized to utilize funds not to exceed Fifty Thousand Dollars (\$50,000.00) to cover the initial expenses of this receivership, including expenses for the services of the Assistant Receiver that are directly related to the initiation of this proceeding. These expenses shall be itemized and presented to the Court for approval in the Receiver's first application for approval of administrative fees and expenses.

19. If any legal action is commenced against the Insurance Commissioner, Receiver, assistant commissioners or receivers, retained counsel, deputies, and/or any of their employees or personnel, whether personally or in an official capacity, they shall be immune from liability and indemnified as defined and set forth under 36 O.S. § 1937.

20. Until further order of the Court, no obligation, claim, or debt of UMIC shall be paid except those which the Receiver deems to be necessary or appropriate to facilitate the taking of possession. Except as provided for herein, no distribution of the property of UMIC will be made without approval of the Court.

21. UMIC and each of its respective officers, employees, directors, trustees, stockholders, members, subscribers, agents, representatives, and all other persons, are hereby permanently enjoined and prohibited from transacting any further business of UMIC except as authorized by the Receiver, and are further permanently enjoined and prohibited from wasting,

transferring, selling, concealing, destroying, disbursing, disposing of, or assigning any assets, contracts, causes of action, funds, records, correspondence, memoranda, or any other documents or other property of UMIC or any of its respective affiliates.

22. UMIC, its respective officers, employees, directors, affiliates, trustees, stockholders, shareholders, insurers, agents, representatives, contractors, subcontractors, and all other persons, are hereby directed to assign, transfer, and deliver any and all amounts owed to and/or property of UMIC to the Receiver.

23. Any and all authority of UMIC's officers and directors is hereby terminated.

24. Until further order from this Court, all persons and entities (including secured creditors, unsecured creditors, claimants and/or litigants) are hereby enjoined and prohibited from wasting, transferring, selling, concealing, destroying, disbursing, disposing and assigning, in any manner, the assets and/or property of UMIC; and are further enjoined and prohibited from prosecuting any pending action or litigation involving UMIC (whether as a plaintiff or defendant) or against its insureds; or making any levy against UMIC or against their assets or any part thereof.

25. Any amounts recovered or recoverable from a contractor, reinsurer, or other insurer of UMIC shall not be reduced as a result of this delinquency proceeding.

26. Any and all banks, brokerage houses, financial institutions and any and all other companies, persons, or entities having knowledge of this Order and having in its possession accounts or any other assets which are, or may be, the property of UMIC are restrained from disbursing or disposing of said accounts or assets unless otherwise directed by Receiver, and are further restrained from disposing of or destroying any records, pertaining to any business transaction between UMIC; and such banks, brokerage houses, financial institutions, companies, persons, or entities having done business or doing business with UMIC or having in its possession

assets which are, or may be, the property of UMIC are ordered to immediately deliver any and all such assets and/or records to the Receiver.

27. All agents, brokers, and fronting companies of UMIC and their respective agents, servants, representatives, and employees, and all other persons having knowledge of this Order are restrained from returning any unearned premiums or any money in their possession, or under their control, collected from premiums upon policies, contracts, or certificates of insurance or reinsurance previously issued by UMIC to policyholders or others; and all such agents, servants, representatives, and employees are directed to turn over all such funds in their possession or under their control, including any premium or money to which they may hereafter acquire possession or control, to the Receiver in gross and not net of any commissions which may be due thereon.

28. Except as noted herein, in the interest of judicial economy and until further order from this Court, entry of this Order, by filing with the clerk of any court in this state with competent jurisdiction along with affidavit of counsel of record that a UMIC insured is a named party in a lawsuit, will serve to stay any action for a period not less than ninety (90) days, against UMIC and/or its insureds only, either commenced or in the process of being prosecuted without further notice or the necessity of a separate motion to stay a pending or commenced action. Notwithstanding anything contrary contained herein, this stay order shall not prevent the commencement of any new action against any UMIC and/or its insured, provided however that such new action shall become subject to the provisions of this Order, including the 90 day stay provisions herein. This injunction shall be afforded full faith and credit by sister states. U.S. Const. art. IV § 1.

29. Pursuant to 36 O.S. § 1923, the Insurance Commissioner shall not be required to pay any fee to any public officer in this state for filing, recording, issuing a transcript or certificate

or authenticating any paper or instrument pertaining to the exercise by the Insurance Commissioner, as Receiver, of any of the powers or duties conferred upon him, whether or not such paper or instrument be executed by the Insurance Commissioner or his assistants, deputies, employees, or attorneys of record and whether or not it is connected with the commencement of any action or proceeding by or against the Insurance Commissioner, or with the subsequent conduct of such action or proceeding.

30. As provided by 36 O.S. § 1914(C), the recording of a certified copy of this Order in the Office of the County Clerk of any County where proceedings are pending shall impart the same notice of possession of the assets of UCRRG as would be imparted by a deed, bill of sale, or other evidence of title duly recorded or filed.

31. Unless otherwise ordered by this Court, any violation of this Order or the injunctive relief set forth herein shall be deemed a contempt of Court and shall subject the violating party to such penalties as allowed by law.

Signed and entered this 26th day of March, 2025.

RICHARD C. OGDEN

JUDGE OF THE DISTRICT COURT

APPROVED AS TO FORM AND CONTENT:

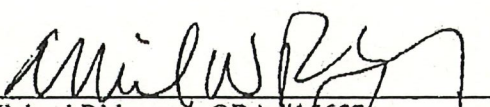

Teresa L. Green, OBA #32897
ATTORNEY FOR PLAINTIFF
STATE OF OKLAHOMA, EX REL.,
GLEN MULREADY, INSURANCE COMMISSIONER
Oklahoma Insurance Department
400 N.E. 50th Street
Oklahoma City, Oklahoma 73105
Phone: (405) 521-2746
Fax: (405) 522-0125

CERTIFIED COPY
AS FILED OF RECORD
IN DISTRICT COURT

MAR 26 2025

RICK WARREN COURT CLERK
Oklahoma County

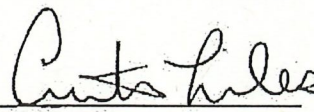



Michael Ridgeway, OBA #15657
ATTORNEY FOR DEFENDANT
UNION MUTUAL INSURANCE COMPANY
MWR PLLC
P.O. Box 5927
Norman, Oklahoma 73069
ridgeway@sbcglobal.net
Phone: (405) 818-4135

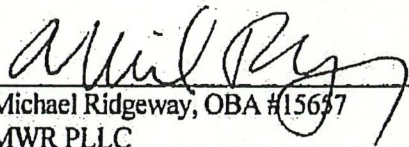
CONSENT TO ORDER

1. Defendant has reviewed the foregoing Agreed Order Placing Union Mutual Insurance Company Into Receivership, Appointing Receiver, and Granting Injunctive Relief and Consent Thereto.
2. Defendant admits the jurisdiction of the Insurance Commissioner, State of Oklahoma, and consents to the entry of the foregoing order.
3. Defendant is aware of its right to notice and a hearing; at which it may be represented by counsel, present evidence, and examine witnesses. Defendant irrevocably waives its right to such notice and hearing and to any court appeals relating to this Consent to Order.
4. Defendant states that no promise of any kind or nature whatsoever, except as expressly contained in this Consent to Order was made to it to induce it to enter into this Consent to Order and that it has entered into this Consent to Order voluntarily,
5. Curtis Liles, as Chief Executive Officer, represents that a majority of the directors of Union Mutual Insurance Company have approved this Consent to Order and duly authorized Curtis Liles to execute this Consent to Order.

UNION MUTUAL INSURANCE COMPANY

By: 
Curtis Liles

Approved:


Michael Ridgeway, OBA #15637
MWR PLLC
Attorney for Union Mutual Insurance Company