

CAUSE NO. D-1-GN-16-000360

THE STATE OF TEXAS, <i>Plaintiff,</i>	§	IN THE DISTRICT COURT OF
	§	
v.	§	TRAVIS COUNTY, TEXAS
	§	
MILLENNIUM CLOSING SERVICES, LLC D/B/A MILLENNIUM TITLE, <i>Defendant.</i>	§	53 rd JUDICIAL DISTRICT
	§	

AMENDED NOTICE OF SUBMISSION

Pursuant to the terms of the Order of Reference to Master entered by the District Court in this cause, the SPECIAL DEPUTY RECEIVER’S APPLICATION FOR APPROVAL OF REPORT OF CLAIMS is hereby set for submission before the Special Master, Tom Collins, **on December 23, 2019.**

The Special Master has asked that the following rules be provided you:

1. Any objection must be filed with the Travis County District Clerk at least three (3) calendar days before the submission date.
2. A copy of any objection shall be served by email by such date on:
 - (a) The Special Master's Docket Clerk, at specialmasterclerk@tdi.texas.gov;
 - (b) The undersigned counsel, Christopher Fuller at cfuller@fullerlaw.org; and
 - (c) All interested parties, including those listed on the SDR's Certificate of Service.
3. The objecting party shall coordinate with the SDR’s counsel and the Docket Clerk [(512) 676-6915]] to obtain an oral hearing setting for argument on the Application and Objection, and complete and attach an “Objecting Party's Notice of Oral Hearing” to the objection.
4. The written objection must specifically list all reasons for objection with supporting references to and discussion of statutory and case authorities. Reasons not stated in writing will not be considered orally.
5. **Please note that if an objection is not filed as described in the Notice of Submission, the Master may consider the Application without a hearing.**
6. **Failure to file timely a written objection before the Special Master constitutes a waiver of the right to object to the Special Master’s recommendation to the District Court.**

7. Any Acknowledgment of Notice and Waiver to be filed by the Guaranty Association or other interested party should be filed at least three (3) calendar days before the submission or hearing date.

Respectfully submitted,

FULLER LAW GROUP

/s/Christopher Fuller

Christopher Fuller

State Bar No. 07515500

4612 Ridge Oak Drive

Austin, Texas 78731

Telephone: (512) 470-9544

Email: cfuller@fullerlaw.org

**Attorney for CANTILO & BENNETT, L.L.P.,
Special Deputy Receiver of Millennium Closing
Services, LLC d/b/a Millennium Title**

CERTIFICATE OF SERVICE

I certify that on December 9, 2019, the foregoing AMENDED NOTICE OF SUBMISSION was served pursuant to the Order of Reference, Court's order requiring electronic service, the Texas Rules of Civil Procedure and TEX. INS. CODE § 443.007(d) on the following by electronic mail, except as specifically noted:

Via e-Mail: specialmasterclerk@tdi.texas.gov
Special Master's Clerk
TEXAS DEPARTMENT OF INSURANCE
Rehabilitation & Liquidation Oversight
PO Box 149104
Austin, TX 78714-9104

Via e-Service: James.Kennedy@tdi.texas.gov
James Kennedy
TEXAS DEPARTMENT OF INSURANCE
PO Box 149104
Austin, TX 78714-9104

Via e-Service: Kimberly.Hammer@tdi.texas.gov
Kimberly Hammer
TEXAS DEPARTMENT OF INSURANCE
PO Box 149104
Austin, TX 78714-9104

Via e-Mail: Vicente.Aguillon@tdi.texas.gov
Vicente Aguillon
TEXAS DEPARTMENT OF INSURANCE
Rehabilitation & Liquidation Oversight
PO Box 149104
Austin, TX 78714-9104

Via e-Service: Cynthia.Morales@oag.texas.gov
Cynthia Morales
Assistant Attorney General
Financial, Litigation, Tax, & Charitable Trusts
OFFICE OF THE TEXAS ATTORNEY GENERAL
P.O. Box 12548
Austin, TX 78711-2548

Via e-Service: rachel.obaldo@oag.texas.gov
Rachel Obaldo
Assistant Attorney General
Bankruptcy and Collections Division
OFFICE OF THE TEXAS ATTORNEY GENERAL
P.O. Box 12548
Austin, TX 78711-2548

Via First Class Mail
INTERNAL REVENUE SERVICE
Special Procedures Branch
300 East 8th Street, Suite 352
Mail Stop 5026AUS
Austin, TX 78701

Via First Class Mail
INTERNAL REVENUE SERVICE
Centralized Insolvency Operation
P.O. Box 7346
Philadelphia, PA 19101-7346

Via e-Service: Kergin@burtonhyde.com
Kergin B. Bedell
BURTON & HYDE, PLLC
311 West 5th Street, Suite 100
Austin, TX 78701

Via e-Service: jason@vandykelawfirm.com
Jason Lee Van Dyke
THE VAN DYKE LAW FIRM
200 Chisholm Place #250
Plano, TX 75075
Counsel for Maverick Title of Texas, LLC

Via e-Service: kyelkin@gardere.com
Kimberly A. Yelkin
GARDERE WYNNE SEWELL LLP
3000 One American Center
600 Congress Avenue
Austin, TX 78701

Via e-Service: burner@mwlaw.com
Burnie Burner
MITCHELL WILLIAMS
500 W. 5th Street Suite 1150
Austin, TX 78701
Counsel for Texas Title Insurance Guaranty Association

Via e-Service: brad@hrrpc.com
Brad Repass
HAYNIE, RAKE, REPASS & KLIMKO, P.C.
14643 Dallas Parkway, Suite 550
Dallas, TX 75254
Counsel for Scott Schambacher, Avondale Development Group, 1601 AF Ltd. and Affiliates

Via e-Service: phil@philmeyerlaw.com
Philip A. Meyer
CityCentre One
800 Town and Country Blvd., Suite 300
Houston, TX 77024
Counsel for First Funding Investments, Inc. and HBAM Properties, LLC

Via e-Service: sam@scarterlawfirm.com
Howard F. Carter, Jr.
THE CARTER LAW FIRM
HOWARD F. CARTER, JR. P.C.
8750 N. Central Expressway, Suite 625
Dallas, TX 75231
Counsel for Peniel Holdings, LLC

Via e-Service: mark@strombergstock.com
Mark Stromberg
STROMBERG STOCK, PLLC
8750 N. Central Expressway, Suite 625
Dallas, TX 75231
Counsel for Peniel Holdings, LLC

Via e-Service: ehill@murphy-hill.com
Eric C. Hill
MURPHY-HILL LAW GROUP
302 W. Commerce Street, Ste 200
Dallas, TX 75208
Counsel for Miriam Gray

Via e-Service: tmcdaniel@imtexaslaw.com
Via e-Service: jbrown@imtexaslaw.com
Via e-Service: gstory@imtexaslaw.com
Timothy M. McDaniel
Jeremy T. Brown
IRELAN MCDANIEL, PLLC
14440 N. Central Expressway, Suite 800
Dallas, TX 75231
Counsel for Leirana Investments, LLC

Via e-Service: rsimon@whitakerchalk.com
Robert A. Simon
WHITAKER, CHALK, SWINDLE & SCHWARTZ PLLC
301 Commerce St., Suite 3500
Fort Worth, TX 76102-4135
Counsel for Scott Schambacher and 1601 AF, Ltd.

Via e-Mail: scott@sterlingdfw.com
Scott Schambacher
5751 Kroger Dr., Suite 293
Kelly, Texas 76244

Via e-Service: susan@susanrosslaw.com
1601 AF, LTD.
c/o Susan Ross – Registered Agent
700 West Harwood Road, Suite C
Hurst, TX 76054

Via First Class Mail
WFG NATIONAL TITLE INSURANCE COMPANY
c/o C T Corporation System – Registered agent
1999 Bryan Street, Suite 900
Dallas TX 75201

Via e-Service: rprice@canteyhanger.com
Randall K. Price
CANTEY HANGER LLP
1999 Bryan Street, Suite 3300
Dallas, TX 75201
Counsel for WFG National Title Insurance Company

Via e-Service: jkoepke@jw.com
John A. Koepke
JACKSON WALKER L.L.P.
2323 Ross Avenue, Suite 600
Dallas, TX 75201
Attorneys for Alliant National Title Insurance

/s/Christopher Fuller _____
Christopher Fuller