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14 **IN THE EIGHTH JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA**  
15 **CLARK COUNTY, NEVADA**

16 STATE OF NEVADA, EX REL. COMMISSIONER  
17 OF INSURANCE, IN HER OFFICIAL CAPACITY  
18 AS STATUTORY RECEIVER FOR DELINQUENT  
19 DOMESTIC INSURER,

20 Plaintiff,

21 vs.

22 SPIRIT COMMERCIAL AUTO RISK RETENTION  
23 GROUP, INC., a Nevada Domiciled Association  
24 Captive Insurance Company,

25 Defendant.

26 Case No. A-19-787325-B  
27 Dept. No. 27

28 **FIFTEENTH STATUS REPORT**

29 COMES NOW, Commissioner of Insurance and Receiver, Barbara D. Richardson, and CANTILO  
30 & BENNETT, L.L.P., Special Deputy Receiver (“SDR”), and files this Fifteenth Status Report in the  
31 above-captioned receivership. In accordance with the orders of this Court and the Nevada Revised  
32 Statutes (“NRS”) Chapter 696B, the Receiver makes this “true report[s] in summary form of the insurer’s  
33 affairs under the receivership and of progress being made in accomplishing the objectives of the  
34 receivership.” NRS 696B.290(7).

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**I.**  
**INTRODUCTION**

Spirit Commercial Auto Risk Retention Group, Inc. (“Spirit” or the “Company”) is an association captive insurance company organized under the insurance laws of Nevada and the Liability Risk Retention Act of 1986. Spirit received its Certificate of Authority on February 24, 2012, and operates under the authority of NRS Chapter 694C. Spirit transacted commercial auto liability insurance business. Within that line, Spirit specialized in serving commercial truck owners.

Pursuant to NRS 679A.160, Spirit is subject to Nevada laws in Chapters 694C and 695E that pertain to captive insurers (as “captive insurer” is defined in NRS 694C.060) and risk retention groups (as “risk retention group” is defined in NRS 695E.110) that have a Certificate of Authority from the Division. Spirit is considered an association captive insurer (as “association captive insurer” is defined in NRS 694C.050). As a risk retention group (“RRG”), Spirit is subject to the Federal Liability Risk Retention Act of 1986. RRGs domiciled in Nevada do not participate in the Nevada Guaranty Association. Pursuant to NRS 695E.140(1)(a), Spirit is also subject to all laws that pertain to traditional liability insurers (with exceptions given in Bulletin 14-008).

As discussed in the Receiver’s First Status Report, Spirit is part of an Insurance Holding Company System and in large part it only did business with other members of that system. CTC Transportation Insurance Services of Missouri, LLC (“CTC”), with offices in Missouri, New Jersey, and California, served as the program administrator and managing general agent for Spirit. Criterion Claims Solutions of Omaha, Inc. (“Criterion”) was the third-party claims administrator for Spirit. Lexicon Insurance Management LLC was the captive manager for the company (after Risk Services initially served in that role through circa July 2018). Chelsea Financial Group, Inc. provided premium financing services for the majority of Spirit’s policies. The company 10-4 Risk Management provided risk management and loss run services. The owner or ultimate controlling person for each of these entities

1 is or was Thomas Mulligan.<sup>1</sup> All of these companies were taking a portion of the premium dollars from  
2 Spirit-issued policies.

3 The Commissioner initially filed her first petition to put the Company into receivership on  
4 January 11, 2019, and her efforts to protect the policyholders and other creditors of the estate were  
5 contested vigorously by the Company. On February 27, 2019, this Court entered its Permanent  
6 Receivership Order. Barbara D. Richardson, Commissioner of Insurance (“Commissioner”), in her  
7 capacity as Receiver for Spirit appointed the firm of CANTILO & BENNETT, L.L.P. as the Special Deputy  
8 Receiver of the Companies. The “Receiver” and “Special Deputy Receiver” are referred to collectively  
9 herein as the “Receiver.”

10 In brief, the Permanent Receivership Order established the following key points for the Spirit  
11 receivership:

- 12 1) that the Company’s in-force insurance policies are to be canceled effective on the earlier  
13 of April 15, 2019, or the date when the insured ceased making premium payments to  
14 Spirit;
- 15 2) that the Receiver may impose a full suspension on all disbursements owed by Spirit,  
16 including insurance policy disbursements, and costs related to the defense or adjudication  
17 of insurance policy claims;
- 18 3) that the receivership court has exclusive jurisdiction over all matters pertaining to Spirit  
19 and all persons are enjoined from commencing, bringing, maintaining, or further  
20 prosecuting any action at law, suit in equity, arbitration, or special or other proceeding  
21 against the Company, Receiver, or Special Deputy Receiver;
- 22 4) that the Receiver is vested with exclusive title both legal and equitable to all of Spirit’s  
23 property wherever located, to administer under the general supervisions of the Court;
- 24 5) that the Receiver may change to her own name the name of any of Spirit’s accounts, funds  
25 or other property or assets, held with any bank, savings and loan association, other  
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27 <sup>1</sup> See Schedule Y: Part 1A, to the Company’s 2018 Annual Statement, the “Detail of Insurance Holding Company  
28 System” (the Receiver’s First Status Report, Ex. B).

1 financial institution, or any other person, wherever located, and may withdraw such  
2 funds, accounts and other assets from such institutions or take any lesser action necessary  
3 for the proper conduct of the receivership; and

- 4 6) that the Receiver is authorized to establish a receivership claims and appeal procedure,  
5 for all receivership claims. The receivership claims and appeals procedures shall be used  
6 to facilitate the orderly disposition or resolution of claims or controversies involving the  
7 receivership or the receivership estate.

8 On September 16, 2019, the Receiver filed a consolidated motion for a Final Order Placing Spirit  
9 Commercial Auto Risk Retention Group into Liquidation, and for an Order Setting a Claims Filing  
10 Deadline, and Granting Related Relief (the “Consolidated Motion”). The Consolidated Motion was  
11 heard and granted on October 24, 2019. On November 6, 2019, the Court entered its Final Order Placing  
12 Spirit into Liquidation (the “Liquidation Order”) and its Final Order Setting Claims Filing Deadline for  
13 Spirit and Related Relief (“the Claims Order”). The Claims Order established a Claims Filing Deadline,  
14 and procedures for filing claims against Spirit. The Liquidation Order also granted the Receiver’s  
15 request to formally place Spirit into liquidation effective on November 6, 2019. On September 30, 2020,  
16 the Court entered an *Order Extending the Claims Filing Deadline for Spirit Commercial Auto Risk*  
17 *Retention Group, Inc.* The Claims Filing Deadline was extended to **May 31, 2021**, and has now expired.

## 18 II.

### 19 RECEIVERSHIP ADMINISTRATION

#### 20 A. Notice of Developments in Receivership

21 On August 19, 2019, the Court entered its Order Regarding Motion for Instructions Including  
22 Notice Requirements (the “Notice Order”). Future notices about Spirit’s receivership will be provided  
23 to interested parties in accordance with the Court’s Notice Order. Interested parties may also monitor  
24 the Spirit receivership web site ([www.spiritinsure.com](http://www.spiritinsure.com)) to keep up to date about developments in the  
25 receivership.

1           **B.       Claims Administration and Third-Party Support Services**

2           TRISTAR Risk Management (“TRISTAR”) is assisting the Receiver in evaluating the Proofs of  
3 Claim (“POCs”) that have been received. TRISTAR’s initial work for the estate included an evaluation  
4 of the outstanding policy claims liabilities of the estate. TRISTAR’s work in this regard is detailed in  
5 the Sixth Status Report and exhibits thereto. TRISTAR has since assisted the Receiver in evaluating and  
6 determining the POCs filed in the Spirit estate. Among other things, TRISTAR also continues to  
7 maintain a customer service telephone line for Spirit, handle inquiries regarding policy claims and other  
8 general inquiries about the receivership, and host certain paper and electronic claim records for the Spirit  
9 estate. Through the appeals phase of the claims process for the estate (*i.e.*, as claimants submit appeals  
10 of the Receiver’s claim determinations), TRISTAR will evaluate the appeal submissions from claimants  
11 and make recommendations to the Receiver regarding proposed resolutions of such appeals. The  
12 Receiver anticipates that it will continue to utilize TRISTAR’s assistance for claims matters, until all  
13 claims and appeals of the estate are resolved. The Receiver will continue to evaluate the need for  
14 TRISTAR’s assistance and will continue to report about TRISTAR’s ongoing work for the estate.

15           The Claims Filing Deadline expired on May 31, 2021. There were 1,405 timely POC  
16 submissions received.

17           The Receiver is evaluating the claims against the estate and has begun mailing written Notices  
18 of Claim Determination to claimants – and these notices advise claimants of whether their claims are  
19 approved (in full or in part) or denied. Approximately eight hundred thirty-one (831) Notices of Claim  
20 Determination have been completed and mailed to the claimants to date. The Receiver has posted a  
21 status update (*i.e.*, advising that POCs are in the process of being evaluated) to the home page of the  
22 Spirit receivership web site. Approximately forty-six (46) appeals of the Receiver’s claim  
23 determinations have been received to date. We are enclosing a report on the determination of the  
24 Receiver on each claim approved in whole or in part, as well as a report of each claim determination to  
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1 which an objection has been filed pursuant to NRS 696B.330(6-8). The unredacted form of the reports  
2 are submitted *in camera*, with the redacted<sup>2</sup> versions being submitted as Exhibit 1 to this report.

3 A status check hearing was held on September 7, 2022, during which counsel for the Receiver  
4 provided a status update to the receivership court regarding the processing of receivership claims and  
5 appeals. The Court set a follow-up status check hearing for December 7, 2022, at 10:30 a.m. Prior to  
6 the next status check hearing, the Receiver will submit to the Court a proposed procedure for appeal  
7 hearings.

8 The United States has filed a POC in the receivership, asserting the priority of its claims—if any  
9 (they are unknown at this time according to the POC)—over and above any other claims against the  
10 estate pursuant to 31 U.S. Code § 3713, also known as the government “superpriority” statute. The  
11 Receiver sent letters to the United States to provide a reminder that its claim must be complete, non-  
12 contingent, and liquidated in amount on or before the May 31, 2021, deadline. No amendment or  
13 supplement from the United States has been received as of the date of this report. The Receiver has also  
14 written to the Centers for Medicare and Medicaid Services (“CMS”), seeking policy guidance regarding  
15 the applicability of certain claim reporting requirements to the Spirit receivership. CMS has yet to  
16 respond, but the Receiver will continue to seek direct input from the agency to clarify the regulatory  
17 requirements for the Spirit estate.

18 The policy data of Spirit is held in the Aspire Information System (“Aspire”), which was created  
19 by Maple Technologies. The Receiver believes that this system is still of value to the receivership,  
20 particularly during the pendency of the POC process and certain litigation matters. At the outset of the  
21 receivership, the Receiver worked with Maple Technologies to continue Spirit’s pre-receivership  
22 arrangement. The Receiver was then able to negotiate a lower monthly cost to maintain the Receiver’s  
23 access to the Aspire system in receivership.<sup>3</sup> The Receiver will regularly review the need for this system.

24 Actuarial firm Oliver Wyman Actuarial Consulting, Inc. (“Oliver Wyman”) has been engaged to  
25 prepare actuarial estimates for Spirit’s claims and future losses. Oliver Wyman previously completed

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27 <sup>2</sup> Individual claimant names have been redacted from the public document out of concern for privacy.

28 <sup>3</sup> The Aspire rate information is included within Exhibit 1 to this report.

1 actuarial estimates for Spirit as of December 31, 2020, and is currently working on the estimates for  
2 Spirit as of December 31, 2021.

3 Calhoun, Thompson & Matza, L.L.P. is a CPA firm that has been hired by the Receiver to prepare  
4 Spirit's federal and state tax returns.

5 PALOMAR FINANCIAL, LC ("Palomar") is an affiliated company of the Special Deputy Receiver  
6 and performs financial and technical administrative support services for Spirit in receivership—and  
7 those services are now being performed by Palomar. Palomar is being used to facilitate the  
8 receivership's administration of financial matters. The Receiver, with assistance from Palomar, has  
9 finalized all outstanding premium tax matters for the Company, including tax matters that remained  
10 outstanding and overdue by former Spirit leadership at the outset of the Receivership, and routine  
11 reporting continues as required for certain state jurisdictions.

12 As the Court is aware, the Receiver has engaged the law firm of Greenberg Traurig LLP  
13 ("Greenberg Traurig"), as counsel in this receivership matter. Additionally, as reported in the previous  
14 status reports, the Receiver has engaged the services of Lewis Roca Rothgerber Christie ("Lewis Roca")  
15 to handle certain limited matters and to act as outside conflicts counsel to address other matters that may  
16 arise in which Greenberg Traurig is not representing the receivership estate.

17 The Receiver has received notice from time to time of lawsuits filed against Spirit in violation of  
18 the Court's Permanent Receivership Order. The Receiver will continue its established procedure of  
19 writing to the parties involved to inform them of the injunctions of the Permanent Receivership Order,  
20 and to request a voluntary dismissal of Spirit from the matter. Thus far, the majority of counsel have  
21 been amenable to such requests. In limited cases and only when absolutely necessary, the Receiver will  
22 engage outside counsel to address ongoing or repeated violations of this Court's orders.

23 **C. Records**

24 The Receiver has made efforts to secure Spirit's electronic records from third parties. The  
25 Receiver will continue with the evaluation of the Company and will continue gathering the Company's  
26 records and data. This process will remain ongoing.

1           **D.     Asset Recovery Litigation and Arbitration**

2           On February 6, 2020, the Receiver filed an asset recovery lawsuit against a number of parties,  
3 including Thomas Mulligan, CTC, Criterion, Spirit’s former directors and officers, various other former  
4 vendors of Spirit, and various other related persons and entities (“Asset Recovery Lawsuit”).<sup>4</sup> The Asset  
5 Recovery Lawsuit was filed in the Eighth Judicial District Court of Clark County, Nevada, and assigned  
6 Case No. A-20-809963-B. Although the majority of Defendants filed answers to the Asset Recovery  
7 Lawsuit, CTC<sup>5</sup> and Criterion Claim Solutions of Omaha, Inc. each filed Motions to Compel Arbitration  
8 of the claims asserted by the Receiver in her asset recovery lawsuit. The Motions to Compel Arbitration  
9 were granted by Judge Denton and thereafter nine of the defendants<sup>6</sup> filed a Motion to Stay Pending  
10 Arbitration, and joinders were filed by nineteen additional defendants. The Court granted the Motion to  
11 Stay Pending Arbitration and the Joinders thereto and the formal Notice of Entry of Order was entered  
12 on November 17, 2020.

13           On April 1, 2021, the Receiver filed a Petition for Writ of Mandamus in the Nevada Supreme  
14 Court regarding, *inter alia* (1) the Court’s July 17, 2020, Order Granting CTC Defendants’ Motion to

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15           <sup>4</sup> The Defendants in the Asset Recovery Lawsuit are: Thomas Mulligan, an Individual; CTC Transportation  
16 Insurance Services of Missouri, LLC, a Missouri Limited Liability Company; CTC Transportation Insurance Services LLC,  
17 a California Limited Liability Company; CTC Transportation Insurance Services of Hawaii LLC, a Hawaii Limited Liability  
18 Company; Criterion Claims Solutions of Omaha, Inc., a Nebraska Corporation; Pavel Kapelnikov, an Individual; Chelsea  
19 Financial Group, Inc., a California Corporation; Chelsea Financial Group, Inc., a Missouri Corporation; Chelsea Financial  
20 Group, Inc., a New Jersey Corporation D/B/A Chelsea Premium Finance Corporation; Chelsea Financial Group, Inc., a  
21 Delaware Corporation; Chelsea Holding Company, LLC, a Nevada Limited Liability Company; Chelsea Holdings, LLC, a  
22 Nevada Limited Liability Company; Fourgorean Capital, LLC, a New Jersey Limited Liability Company; Kapa Management  
23 Consulting, Inc. a New Jersey Corporation; Kapa Ventures, Inc., a New Jersey Corporation; Global Forwarding Enterprises  
24 Limited Liability Company, a New Jersey Limited Liability Company; Global Capital Group, LLC, a New Jersey Limited  
25 Liability Company; Global Consulting; New Tech Capital, LLC, a Delaware Limited Liability Company; Lexicon Insurance  
26 Management LLC, A North Carolina Limited Liability Company; Icap Management Solutions, LLC, a Vermont Limited  
27 Liability Company; Six Eleven LLC, a Missouri Limited Liability Company; 10-4 Preferred Risk Managers Inc., a Missouri  
28 Corporation; Ironjab LLC, a New Jersey Limited Liability Company; Yanina G. Kapelnikov, an Individual; Igor Kapelnikov,  
an Individual; Quote My Rig LLC, a New Jersey Limited Liability Company; Matthew Simon, an Individual; Daniel George,  
an Individual; John Maloney, an Individual; James Marx, an Individual; Carlos Torres, an Individual; Virginia Torres, an  
Individual; Scott McCrae, an Individual; Brenda Guffey, an Individual; 195 Gluten Free LLC, a New Jersey Limited Liability  
Company, Doe Individuals I-X; and Roe Corporate Entities I-X. The Receiver’s previous Twelfth Status Report provides  
the dates that answers to the suit were filed by the defendants.

25           <sup>5</sup> Here, “CTC” refers to Defendants CTC Transportation Insurance Services of Missouri LLC; CTC Transportation  
26 Insurance Services, LLC; and CTC Transportation Insurance Services of Hawaii LLC.

27           <sup>6</sup> Six Eleven LLC, Quote My Rig, LLC, New Tech Capital, LLC, 195 Gluten Free LLC, 10-4 Preferred Risk  
28 Managers, Inc., Ironjab LLC, Fourgorean Capital LLC, Chelsea Holdings Company, LLC (“Chelsea Holdings”), and Chelsea  
Financial Group, Inc. (MO) (“Chelsea Financial MO”) (collectively, “Six Eleven Defendants”).

1 Compel Arbitration, (2) the Court’s July 22, 2020, Order Granting Criterion Claim Solution’s Motion to  
2 Compel Arbitration, and (3) the Court’s November 17, 2020, Order Granting the Motion to Stay Pending  
3 Arbitration and all Joinders Thereto. On February 18, 2022, the Nevada Supreme Court denied the  
4 Receiver’s petition for writ of mandamus – thereby requiring the Receiver to pursue two separate  
5 arbitration proceedings to recover Spirit’s assets (*i.e.*, while litigation against the remaining defendants  
6 is stayed pending the outcome of the separate arbitration proceedings).

7 Accordingly, on February 25, 2022, the Receiver filed a Motion for Leave to Initiate Arbitration  
8 Proceedings on Order Shortening Time. On March 14, 2022, this Court granted the Receiver Leave to  
9 Initiate Arbitration Proceedings against the CTC Defendants and Criterion Claims Solutions of Omaha,  
10 Inc.

11 After working with counsel for CTC and Criterion on stipulated arbitrations procedures that will  
12 govern the two separate arbitration proceedings, the Receiver initiated arbitration by submitting a  
13 demand/complaint on CTC on August 2, 2022. CTC requested additional time to respond to the same  
14 and the response is due on October 5, 2022. The Receiver submitted an arbitration demand/complaint  
15 on Criterion on August 19, 2022, and Criterion filed a response on September 19, 2022. The Receiver  
16 and Criterion have agreed upon an arbitrator and anticipate a scheduling conference will be scheduled  
17 in the near term.

18 **E. Actuarial Reports**

19 Oliver Wyman is an actuarial firm that was selected to prepare actuarial estimates for Spirit’s  
20 claims and future losses. Oliver Wyman has completed its actuarial report for Spirit as of December 31,  
21 2020. The Receiver wrote about the report in the previous Tenth Status Report.

22 **F. Receivership Assets and Liabilities**

23 The Receiver has been gathering information and evaluating the assets and liabilities of Spirit.  
24 The Receiver’s liability analysis will continue to evolve as the claims of the estate are determined, asset  
25 recoveries are made, and actuary estimates of Spirit’s liabilities are updated. Below is an overview of  
26 some key assets and liability matters thus far identified by the Receiver.

- 1           1.       CTC owes a large balance to Spirit that is at least more than \$40 million and may  
2                    be much greater after further discovery. The Receiver filed the Asset Recovery  
3                    Lawsuit seeking the return of this money *inter alia* as detailed above, and is also  
4                    pursuing claims in arbitration as also detailed above.
- 5           2.       The cash and invested assets of the Company were approximately \$  
6                    \$35,010,557.91 as of August 31, 2022.
- 7           3.       Gross Loss and Loss Adjustment Expense (“LAE”) and General Liability Losses:  
8                    The gross unpaid loss & allocated LAE as of December 31, 2020, are estimated  
9                    at \$198,663,000 by Oliver Wyman.
- 10          4.       Other Assets: There is no known tangible personal property or real property  
11                    owned by the Company.

12           We are enclosing the consultants and Special Deputy Receiver bills paid or approved for payment  
13           since the last status report filed with the Court, and the detailed billings are submitted *in camera*, with  
14           summaries of such bills being submitted as Exhibit 2 to this report.<sup>7</sup> The Receiver is including, as Exhibit

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15                   <sup>7</sup> The *in-camera* materials are being submitted in a separate envelope that reflect paid invoices. Certain billings  
16                   submitted to the Court are appropriate for *in camera* review (as opposed to being made part of a public filing). More  
17                   particularly, and as discussed in further detail below, certain consultants in this matter will provide expert witness related  
18                   services. As such, the billing entries relating thereto should be considered confidential and/or otherwise not subject to  
19                   discovery. As detailed above, claims administration is a significant part of the work remaining to be completed prior to  
20                   winding down the Spirit liquidation and is a significant expense for the estate. TRISTAR’s detailed invoices have been  
21                   included with the *in camera* submission for the Court’s information. The Receiver has approved billing rates for Cantilo  
22                   & Bennett, L.L.P. as of January 1, 2022, which are included in the billings for that month, and which updates earlier billing  
23                   rates approved by the Receiver.

24           In this regard, courts have held that the bills of legal counsel and experts may be withheld from legal discovery and  
25           are not subject to legal disclosure, as this information may provide indications or context concerning potential litigation  
26           strategy and the nature of the expert services being provided. *See, e.g., Avnet, Inc. v. Avana Technologies Inc.*, No. 2:13-cv-  
27           00929- GMN-PAL, 2014 WL 6882345, at \*1 (D. Nev. Dec. 4, 2014) (finding that billing entries were privileged because  
28           they reveal a party’s strategy and the nature of services provided); *Fed. Sav. & Loan Ins. Corp. v. Ferm*, 909 F.2d 372, 374-  
29           75 (9th Cir. 1990) (considering whether or not fee information revealed counsel’s mental impressions concerning litigation  
30           strategy). Other courts that have addressed this issue have recognized that the “attorney-client privilege embraces attorney  
31           time, records and statements to the extent that they reveal litigation strategy and the nature of the services provided.” *Real v.*  
32           *Cont’l Grp., Inc.*, 116 F.R.D. 211, 213 (N.D. Cal. 1986).

33           The *in-camera* review should apply not only to documentation concerning attorney fees, but it also extends to  
34           “details of work revealed in [an] expert’s work description [which] would relate to tasks for which she [or he] was  
35           compensated[.]” a situation which is “analogous to protecting attorney-client privileged information contained in counsel’s  
36           bills describing work performed.” *See DaVita Healthcare Partners, Inc. v. United States*, 128 Fed. Cl. 584, 592-93 (2016);  
37           *see also Chaudhry v. Gallerizzo*, 174 F.3d 394, 402 (4th Cir. 1999) (recognizing that “correspondence, bills, ledgers,  
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1 3 attached hereto, a cash flow report for August 31, 2022, reflecting recoveries, disbursements, and cash  
2 flow since the receivership began.

3 **III.**

4 **CONCLUSION**

5 In compliance with this Court's instructions for a status report regarding the affairs of the  
6 Company, the Receiver has submitted the aforementioned status report and requests that the Court  
7 approve this Fifteenth Status Report and the actions taken by the Receiver.

8 DATED this 27<sup>th</sup> day of September 2022.

9 Respectfully submitted:

10 Barbara D. Richardson, Commissioner of  
11 Insurance of the State of Nevada, in her Official  
12 Capacity as Statutory Receiver of Delinquent  
13 Domestic Insurer

14 By: /s/ CANTILO & BENNETT, L.L.P.  
15 Special Deputy Receiver  
16 By Its Authorized Representative  
17 Mark F. Bennett

18 MARK E. FERRARIO, ESQ. (SB# 1625)  
19 KARA HENDRICKS, ESQ. (SB# 7743)  
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23 Las Vegas, Nevada 89135

24 *Counsel for Barbara D. Richardson,*  
25 *Commissioner of Insurance,*  
26 *as the Permanent Receiver for Spirit*  
27 *Commercial Auto Risk Retention Group, Inc.*

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statements, and time records which also reveal the motive of the client in seeking representation, litigation strategy, or the  
specific nature of the services provided, such as researching particular areas of law," are protected from disclosure) (quoting  
*Clarke v. Am. Commerce Nat'l Bank*, 974 F.2d 127, 129 (9th Cir. 1992)).

**CERTIFICATE OF SERVICE**

1  
2 Pursuant to Nev. R. Civ. P. 5(b)(2)(D) and E.D.C.R. 8.05, I certify that on this 27<sup>th</sup> day of  
3 September 2022, I caused a true and correct copy of the foregoing *Fifteenth Status Report* to be e-filed  
4 and e-served on the upon the parties all parties registered for e-service. The date and time of the  
5 electronic proof of service is in place of the date and place of deposit in the mail.

6  
7 /s/ Andrea Lee Rosehill  
8 An employee of Greenberg Traurig, LLP  
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