

NINETEENTH JUDICIAL DISTRICT COURT
THE PARISH OF EAST BATON ROUGE
STATE OF LOUISIANA

NUMBER:

633396

DIVISION

D

JAMES J. DONELON
COMMISSIONER OF INSURANCE FOR THE STATE OF LOUISIANA

VERSUS

MOTHE LIFE INSURANCE COMPANY
AND ITS WHOLLY OWNED SUBSIDIARY, DLE LIFE INSURANCE COMPANY

STATE
SEP 10 2014
by DEPUTY CLERK OF COURT

FILED: _____

DEPUTY CLERK

PETITION FOR REHABILITATION, INJUNCTIVE RELIEF AND RULE TO SHOW CAUSE

The petition of James J. Donelon, Commissioner of Insurance for the State of Louisiana ("Commissioner"), respectfully represents that:

1.

Made defendant herein is MOTHE LIFE INSURANCE COMPANY is a Louisiana corporation, licensed to do and doing business in the State of Louisiana.

2.

MOTHE LIFE INSURANCE COMPANY maintains their corporate registered office at 401 Whitney Avenue, Suite 303; Gretna, La. 70056.

3.

MOTHE LIFE INSURANCE COMPANY is engaged in the business of insurance and is deemed an insurer within the State of Louisiana pursuant to LSA-R.S 22:2002 and LSA-R.S. 22:2003 of the Louisiana Revised Statutes.

4.

After a review of the financial condition and affairs of MOTHE LIFE INSURANCE COMPANY, the Commissioner has determined that MOTHE LIFE INSURANCE COMPANY is financially troubled and insolvent and in violation of the minimum capital and surplus requirements of the Louisiana Insurance code, as shown in the affidavit attached hereto and incorporated herein as Exhibit A. This provides sufficient grounds to justify the issuance of a court order

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of rehabilitation and injunctive relief under LSA-R.S. 22:2006 and other applicable law.

5.

MOTHE LIFE INSURANCE COMPANY filed a Quarterly Statement with the Louisiana Department of Insurance for the quarter ending June 30, 2014, which statement showed that MOTHE LIFE INSURANCE COMPANY did not have sufficient capital and surplus to meet its obligations, with assets of \$15,994,059, and negative capital and surplus of \$5,133,492. See excerpts from the June 30, 2014 Quarterly Statement, attached as Exhibit B.

6.

The continued operation and further transaction of business by MOTHE LIFE INSURANCE COMPANY would be hazardous to its policyholders, its creditors and/or to the public, and any delay in action by the Commissioner would endanger the interests of its policyholders, creditors, and/or the public. Additionally, the financial condition of MOTHE LIFE INSURANCE COMPANY does not meet the requirements of the Louisiana Insurance Code as to minimum capital and surplus. Therefore, the Commissioner has the power and authority to place MOTHE LIFE INSURANCE COMPANY in rehabilitation. These causes are listed in the affidavit attached hereto and incorporated as Exhibit A.

7.

Inasmuch as MOTHE LIFE INSURANCE COMPANY, is deemed a domestic insurer in accordance with Louisiana law, for the foregoing reasons, the Commissioner desires and is entitled to have this Court declare that MOTHE LIFE INSURANCE COMPANY is in need of rehabilitation under the Louisiana Insurance Code and appoint the Commissioner, and any other deputy which he may designate, as Receiver or Deputy Receiver or Rehabilitator of MOTHE LIFE INSURANCE COMPANY.

8.

DLE LIFE INSURANCE COMPANY is a Louisiana corporation, authorized to and doing business in the State of Louisiana. DLE LIFE INSURANCE COMPAMY maintains its corporate registered office at 401 Whitney Avenue, Suite 303; Gretna, La. 70056. DLE LIFE INSURANCE COMPANY is engaged in the business of insurance within the State of Louisiana as defined by LSA-R.S.

22:46, and other applicable law.

9.

One Hundred Percent (100%) of DLE LIFE INSURANCE COMPANY is owned and controlled by MOTHE LIFE INSURANCE COMPANY and ownership of the DLE stock is the largest single asset of MOTHE LIFE INSURANCE COMPANY. This provides sufficient grounds to justify the inclusion of DLE LIFE INSURANCE COMPANY in the issuance of an order of rehabilitation and injunctive relief of MOTHE LIFE INSURANCE COMPANY.

10.

It is therefore necessary that this Court, pursuant to LSA-R.S. 22:2006, issue forthwith, an order enjoining MOTHE LIFE INSURANCE COMPANY's, and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY's, current or former shareholders, officers, directors, agents, accountants, attorneys, actuaries, servants, and employees, and any others acting on its behalf, from disposing of property, business, affairs, bank accounts, safety deposit boxes, software, electronic data, e-mail, websites, copyrights, trademarks, patents, books, records, accounts, and other assets of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, including all real property, and from the transaction of business by MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, except with the concurrence of the Commissioner until further order of this Court.

11.

The Commissioner further shows that he is entitled to be vested by operation of law with the title to all property, business, affairs, accounts, bank accounts, safety deposit boxes, records and all other assets of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, as of the date of the order of rehabilitation entered herein. LSA-RS 22:2008.

12.

The Commissioner further shows that he is entitled to the right to enforce contract performance by any party who had a contract with MOTHE LIFE INSURANCE COMPANY and

DLE LIFE INSURANCE COMPANY and to permit such further operation of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, and for such other relief as he may deem necessary to be in the best interests of the policyholders of the company.

13.

The Commissioner requests that within ten (10) days of the entry of the order providing the relief requested in the prayer of this petition, a Rule Nisi issue herein directed to MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, ordering them to show cause or a date and time to be fixed by this Court why this Court should not find, order and declare that sufficient cause exists for the rehabilitation of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY; and further order and direct the Commissioner, his agents and/or employees to take and/or maintain possessions of all the affairs, property, business, books, records, claim files, account, bank accounts, safety deposit boxes, software, electronic data, e-mail, websites, copyrights, trademarks, patents, and all other assets of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, including all real property und the premises occupied by MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, whether in possession of defendants or their officers, directors, employees, consultants, attorneys, agents, or any other person acting on their behalf to conduct their business and liquidate the same according to law; and why the other relief prayed for and granted herein should not be continued.

14.

The Commissioner further requests that an order issue herewith appointing Cara Bostick as Receiver of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY.

The Commissioner submits that service of the order of rehabilitation entered by the Court should be made forthwith and asks that that Mathew Stewart, Norrie Falgoust, Jimmy Henry, and Rudy Babin be appointed as Process Servers for service of all process and further pleadings on MOTHE LIFE INSURANCE COMPANY and DLE LIFE INSURANCE COMPANY.

WHEREFORE, James J. Donelon, Commissioner of Insurance for the State of Louisiana prays that this petition for rehabilitation be accepted and filed and that MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, be placed into rehabilitation and that the Commissioner as Rehabilitator be vested by operation of law with the title to all property, business, affairs, accounts, bank accounts, safety deposit boxes, records and other assets of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY. as of the date of the order of rehabilitation entered herein and that an injunction and order issue that provides the following immediate relief:

- 1) The Commissioner be appointed Rehabilitator and be allowed and authorized to appoint a Receiver and/or Deputy Receiver to employ and authorize the compensation of accountants, clerks, and such assistants as he deems necessary, and authorize the payment of the expenses of these proceedings and the necessary incidents thereof, as approved by the Court, to be paid out of the funds or assets of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, in the possession of the Receiver and/or Rehabilitator or coming into MOTHE LIFE INSURANCE COMPANY's and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY's possession;
- 2) Any officer, director, manager, employee, trustee or agent of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY and any person who possesses or possessed any executive authority over, or who exercises or exercised any control over any segment of MOTHE LIFE INSURANCE COMPANY's and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY's, affairs be required to fully cooperate with the Receiver and/or Deputy Receiver and/or Rehabilitator or his appointees, notwithstanding their dismissal pursuant to the order entered herein.
- 3) The Rehabilitator or his appointees and/or Receiver and/or Deputy Receiver be authorized to conduct an investigation of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, and its/their subsidiaries and affiliates to uncover and make fully available to the Court the true state of MOTHE LIFE INSURANCE COMPANY's and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY's, financial affairs. In furtherance of this investigation, MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY/ and its/their parent corporations, its subsidiaries, its affiliates, its current or former owners, officers, directors, managers, trustees, agents, adjusters, attorneys, employees, or independent contractors of MOTHE LIFE INSURANCE COMPANY and its

wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, and its/their third party administrators, be required to make all books, documents, accounts, records and affairs, which either belong to or pertain to MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, available for full, free and unhindered inspection and examination by the Commissioner or his designee during normal business hours (9:00 a.m. to 5:00 p.m.) Monday through Friday, from the date of the order entered herein. MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, and the above-specified entities shall fully cooperate with the Rehabilitator or his appointees and/or Receiver and/or Deputy Receiver. Such cooperation shall include, but not be limited to, the taking of oral testimony under oath of MOTHE LIFE INSURANCE COMPANY's, and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY's, owners, officers, directors, managers, trustees, agents, adjusters, employees, or independent contractors of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, its/their affiliates and subsidiaries and any other person or entity who possesses any executive authority over, or who exercises any control over, any segment of the affairs of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, in both their official, representative, and individual capacities and the production of all documents that are calculated to disclose the true state of MOTHE LIFE INSURANCE COMPANY's and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY's affairs.

- 4) MOTHE LIFE INSURANCE COMPANY be declared insolvent and placed into rehabilitation, and DLE LIFE INSURANCE COMPANY, its wholly owned subsidiary, be placed in rehabilitation as the largest single asset of MOTHE LIFE INSURANCE COMPANY, and the Commissioner be appointed Rehabilitator and Cara Bostick be appointed Receiver.
- 5) the Commissioner as Rehabilitator, Cara Bostick as Receiver, and/or his appointees be vested by operation of law with the title to all property, business, affairs, accounts, bank accounts, safety deposit boxes, records and other assets of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, as of the date of the order of rehabilitation entered herein.
- 6) pursuant to LSA-R.S. 22:2006, the Rehabilitator, the Receiver and/or his appointees, his agents and/or employees take possession and control of the property, business, affairs, bank accounts, safety deposit boxes, computers, all primary and secondary storage media, documents, claims files, software, electronic data, e-mail, websites, books, records, accounts, copyrights, trademarks, patents and all other assets of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, including all real property, whether in the possession of MOTHE LIFE INSURANCE COMPANY and/or and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY and/or its/their current or former shareholders, officers, directors, employees, servants, consultants, trustees, adjusters, independent contractors, actuaries, accountants, attorneys, subsidiaries, affiliates or agents, and any other partnership, company, or entity controlled by same and/or persons acting for or on behalf of said individuals and companies, and/or any others acting on its/their behalf, and of the premises occupied by the MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, for its/their business, enjoining MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, and/or its/their current or former shareholders, officers, directors, employees, servants, consultants, trustees, adjusters, independent contractors, actuaries, accountants, attorneys, subsidiaries, affiliates or agents, and any other partnership, company, or entity controlled by same and/or persons acting for or on behalf of said individuals and companies, and/or any others acting on its/their behalf, from disposing of property or assets and from the transaction of the business of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE

INSURANCE COMPANY, except with the concurrence of the Rehabilitator and/or until further order of this Court.

- 7) MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, and/or its/their current or former shareholders, officers, directors, employees, servants, consultants, trustees, adjusters, independent contractors, actuaries, accountants, attorneys, subsidiaries, affiliates or agents, banks, savings and loan association, financial institutions, and any other partnership, company, or entity controlled by same and/or persons acting for or on behalf of said individuals and companies, and/or any others acting on its/their behalf, be ordered to immediately surrender and turn over to the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver all property, business, affairs, documents, computers, all primary and secondary storage media, bank accounts, safety deposit boxes, software, electronic data, e-mail, websites, books, records, accounts, and other assets of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, including all real property, and the premises occupied by MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY and be enjoined from the transaction of the business of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, except with the concurrence of the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver until further order of this Court.
- 8) an injunction issue herewith enjoining MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, and/or its/their current or former shareholders, officers, directors, employees, servants, consultants, trustees, adjusters, independent contractors, trustees, adjusters, independent contractors, actuaries, accountants, attorneys, subsidiaries, affiliates or agents, banks, savings and loan association, financial institutions, and any other partnership, company, or entity controlled by same and/or persons acting for or on behalf of said individuals and companies, and/or any others acting on its/their behalf, from disposing of the property or assets of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, and from the transaction of its/their business except with the concurrence of the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver, until further order of this Court.
- 9) an injunction issue herewith enjoining and staying all persons and entities from obtaining preferences, judgments, attachments or other like liens or the making of any levy against MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, its/their property and assets while in the possession and control of the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver, until further order of this Court.
- 10) an injunction issue herewith enjoining MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, and/or its/their current or former shareholders, officers, directors, employees, servants, consultants, trustees, adjusters, independent contractors, actuaries, accountants, attorneys, subsidiaries, affiliates or agents, and any other partnership, company, or entity controlled by same and/or persons acting for or on behalf of said individuals and companies, and/or any others acting on its/their behalf and/or subject to its/their control, and all other persons or entities who have access to, control or possession of the property, assets, and affairs of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY as follows:
 - a) from disposing of or encumbering any of the property or assets of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY;

- b) from disposing of any records of or other documents belonging to MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, or relating to the business and affairs of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY;
 - c) from transaction of any business by, for, or on behalf of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, including, but not limited to:
 - i) the writing, issuance or renewal of any insurance policy, binder, or endorsement to an existing policy or certificate of coverage;
 - ii) the payment of claims and of any policy benefits;
 - iii) the incurring of any claim or loss adjustment expense;
 - iv) the incurring of any debt or liability, except with the concurrence of the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver until further order of this Court; or
 - v) the interfering with the acquisition of possession by the exercise of dominion and control over the property of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY by the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver or interfering with the conduct of the business and affairs of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, by the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver.
- 11) the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver be entitled to permit such further operation of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, as he/they may deem necessary to be in the best interests of policyholders and creditors of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY.
- 12) the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver be allowed and authorized to:
- a) Employ and authorize the compensation of accountants, clerks, attorneys, actuaries, and such assistants as he deems necessary, and authorize the payment of the expenses of these proceedings and the necessary incidents thereof, as approved by the Court, to be paid out of the funds or assets of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, in the possession of the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver or coming into their possession;
 - b) Defend or not defend legal actions wherein MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, or the Rehabilitator and/or his appointees and/or the Receiver or Deputy Receiver is a party defendant, commenced prior to or subsequent to the entry of the order herein, without the authorization of the Court, except, however, in actions where MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE

LIFE INSURANCE COMPANY, is a nominal party, as in certain foreclosure actions, and the action does not affect a claim against or adversely affect the assets of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, the Rehabilitator and/or his appointees and/or the Receiver or Deputy Receiver may file appropriate pleadings in his/their discretion;

- c) Commence and maintain all legal actions necessary, wherever necessary, for the proper administration of this receivership proceeding;
 - d) Collect all debts, which are economically feasible to collect and which are due and owing to MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY;
 - e) Take possession of all MOTHE LIFE INSURANCE COMPANY's and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY's, securities and certificates of deposit on deposit with the Commissioner of Insurance of the State of Louisiana or any other person or entity, if any, and convert to cash so much of the same as may be necessary, in his judgment, to pay the expenses of administration of this receivership; and
 - f) Issue endorsements on existing policies.
- 13) any officer, director, manager, trustee, employee, servant, adjustor, consultant, actuary, accountant, attorney, agent, and/or any person acting for or on behalf of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, and any person who possesses or possessed any executive authority over, or who exercises or exercised any control over any segment of the affairs of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, be required to fully cooperate with the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver, notwithstanding their dismissal pursuant to the order entered herein.
- 14) all attorneys employed by MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, as of the date of the order entered herein be required within ten (10) days' notice of this order, to report to the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver on the name, company, claim number and status of each file they are handling on behalf of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY. Said report shall also include an account of any funds received from or on behalf of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY; and that all attorneys described herein be discharged as of the date of the order entered herein unless the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver retains their services in writing; that all attorneys employed by MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, who are in possession of litigation files or other material, documents or records belonging to or relating to work performed by the attorney on behalf of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, be required to deliver such litigation files, material, documents or records intact and without purging to the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver, notwithstanding any claim of a retaining lien, which, if otherwise valid, shall not be extinguished by such turn-over of documents.
- 15) reinsurance premiums due to or payable by MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, be remitted to, or disbursed by the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver or to another party at the discretion of the Rehabilitator or his appointees and/or the

Receiver or Deputy Receiver; that the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver shall handle reinsurance losses recoverable or payable by MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, and all correspondence concerning reinsurance be between the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver and the reinsuring company or intermediary unless otherwise requested by the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver.

- 16) upon request by the Rehabilitator or his appointees and or the Receiver or Deputy Receiver, any company providing telephone services to MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, be required to provide a referral of calls from the number presently assigned to MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY to any such number designated by the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver or perform any other services or changes necessary to the conduct of the receivership of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY.
- 17) any bank, savings and loan association, financial institution, and any other person or entity which has on deposit, and/or in its possession, custody or control any funds, accounts and any other assets of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, be required to immediately transfer title, custody and control of all such funds, accounts, or assets to the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver, and be instructed that the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver has absolute control over such funds, accounts and other assets; and that the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver may change the name of such accounts and other assets, withdraw them from such bank, savings and loan association or other financial institution or take such lesser action necessary for the proper conduct of this receivership.
- 18) any bank, savings and loan association, or other financial institution shall not be permitted to exercise any form of set-off, alleged set-off, lien, any form of self-help whatsoever, or refuse to transfer any funds or assets to the Rehabilitator's or his appointees and/or the Receiver or Deputy Receiver control without the permission of this Court.
- 19) any entity furnishing telephone, water, electric, internet, cable, sewage, garbage or trash removal services to MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, be required to maintain such service and transfer any such accounts to the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver as of the date of the order entered herein, unless instructed to the contrary by the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver.
- 20) any data processing service which has custody or control of any data processing information and records, including, but not limited to, source documents, data processing cards, input tapes, all types of storage information, master tapes or any other recorded information relating to MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, be required to transfer custody and control of such records to the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver.
- 21) the United States Postal Service be directed to provide any information requested by the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver regarding MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, and to handle future deliveries of MOTHE LIFE INSURANCE COMPANY's and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY's mail as

directed by the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver.

- 22) the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver be permitted to conduct an investigation of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, and its/their subsidiaries and affiliates to uncover and make fully available to the Court the true state of MOTHE LIFE INSURANCE COMPANY's and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY's financial affairs. In furtherance of this investigation, MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, and its/their parent, subsidiaries, affiliates, third party administrators, current and/or former owners, shareholders, employees, servants, consultants, trustees, adjusters, independent contractors, actuaries, accountants, attorneys, subsidiaries, affiliates or agents, and any other partnership, company, or entity controlled by same and/or persons acting for or on behalf of said individuals and companies, and/or any others acting on its/their behalf and/or subject to its/their control shall make all books, documents, accounts, records and affairs, which either belong to or pertain to MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, available for full, free and unhindered inspection and examination by the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver during normal business hours (9:00 a.m. to 5:00 p.m.) Monday through Friday, from the date of the order entered herein. MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, and the above-specified entities shall fully cooperate with the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver. Such cooperation shall include, but not be limited to, the taking of oral testimony under oath of the above-specified entities and any other person or entity who possesses any executive authority over, or who exercises any control over, any segment of the affairs of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY in both their official, representative, and individual capacities and the production of all documents that are calculated to disclose the true state of MOTHE LIFE INSURANCE COMPANY's and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY's, affairs.
- 23) any and all individuals and entities be enjoined from instituting and/or taking further action in any suits, proceedings, and seizures against MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver in his capacity as Rehabilitator or his appointees and/or the Receiver or Deputy Receiver of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, and its/their officers, directors, subsidiaries, affiliates, insurers, representatives, third party administrators, employees, servants, consultants, trustees, adjusters, actuaries, accountants, attorneys, to prevent any preference, judgment, seizure, levy, attachment, or lien being rendered against MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, its estate and assets, and/or its insureds, members, subscribers, enrollees, and policyholders, the Commissioner in his capacity as Rehabilitator or his appointees and/or the Receiver or Deputy Receiver, any affiliates, subsidiaries, insurers, officers, directors, representatives, agents, employees, or attorneys of same, and the making of any levy against MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, its/their property or assets, until further order of this Court.
- 24) except with the concurrence of the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver or until further written order of this Court, all suits, proceedings, and seizures against MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY and/or its/their respective policyholders be stayed in order to prevent the obtaining of any preference, judgment, seizure, levy, or lien, and to preserve the property and assets of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, including, but not limited to, suits and proceedings and all litigation where:

- a) MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, is a party;
 - b) A policyholder or any other person who is named as a party to the litigation or claims insurance coverage under any policy of insurance issued or assumed by MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY;
 - c) The litigation involves or may involve the adjudication of liability or determines any possible rights or obligations of any insured, policyholder or person as to any insurance policy issued or assumed by MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, or determines any possible future liability of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, with regard to any insurance policy issued or assumed by MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY;
 - d) Where MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, would otherwise be obligated to provide a defense to any party in any court pursuant to any policy of insurance issued or assumed by MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY;
 - e) Where the ownership, operations, management and/or control of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY is at issue; and
 - f) Any party is seeking to create, perfect or enforce any preference, judgment, attachment, lien or levy against MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY or its/their assets or against any policyholder or insured of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY.
- 25) this Court order that no liability on the part of, and that no cause of action shall exist against, the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, and/or the Attorney General of the State of Louisiana in his capacity as attorney for the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, and/or their representatives, agents, employees, or attorneys, for any action taken by them when acting in accordance with the orders of this Court and/or as Rehabilitator or his appointees and/or the Receiver or Deputy Receiver of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, and that such actions shall be barred.
- 26) after the payment of all administrative expenses of rehabilitation, all other obligations of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY should be paid pursuant to the orders of this Court according to the applicable law.
- 27) any and all individuals and entities be enjoined from interfering with these proceedings, or with the Rehabilitator's or his appointees and/or the Receiver or Deputy Receiver possession and control or title, rights or interest; from interfering with the conduct of the business of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, by the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver; from wasting the assets of MOTHE LIFE INSURANCE

COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, and from obtaining preferences, judgments, attachments or other like liens or the making of any levy against MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, or its/their property and assets while in the possession and control of the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver, until further order of this Court.

- 28) all authority of all officers, directors, and managers of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, be suspended and vested in the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver until further written order of this Court.
- 29) all individuals and entities be enjoined from instituting or taking further action in any suit or proceeding against MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver, any affiliates, subsidiaries, insurers, officers, directors, representatives, agents, employees, or attorneys of the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver or MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, its estate and assets, and its policyholders, and from making any levy or seizure against MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, or its/their estates and assets while under the possession and control of the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver until further written order of this Court.
- 30) all premiums and all other debts and payables due to MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY be paid to the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver, until further order of this Court.
- 31) the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver be permitted to notify every holder of a certificate of coverage or contract of insurance issued by MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, and every known creditor of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, of the order of rehabilitation and injunction entered herein within sixty (60) days of the date of this order, notwithstanding the provisions of La R.S. 22:2011.
- 32) the provisions of the Louisiana Insurance Code and any contractual agreement as to late payment penalties, interest, attorneys fees, adjustments, or other such charges be suspended. LSA-R.S. 22: 1811 and 1973.
- 33) premiums and all other debts payable to MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, be paid to the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver.
- 34) all contracts between MOTHE LIFE INSURANCE COMPANY and/or its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, and any and all other persons and entities providing services to MOTHE LIFE INSURANCE COMPANY and/or its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, and its/their policyholders and insureds remain in full force and effect until further order of this Court.
- 35) an immediate moratorium be placed on policy loans, cash surrenders, sick claims and coupon payments on all policies issued by MOTHE LIFE INSURANCE COMPANY and/or its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY until further order of the Court.

- 36) barring the employees and/or directors, and/or agents of MOTHE LIFE INSURANCE COMPANY and/or its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, from attempting to sell the book of business of MOTHE LIFE INSURANCE COMPANY and/or its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY without the consent of the Commissioner as Rehabilitator or his appointees and/or the Receiver or Deputy Receiver and the Louisiana Guaranty Association.
- 36) the Commissioner be granted all legal and equitable relief as may be necessary to fulfill his duties as rehabilitator and for such other relief as the nature of the case and the interests of MOTHE LIFE INSURANCE COMPANY's and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY's, insureds, policyholders, creditors, and/or the public, may require.

WHEREFORE, the Commissioner further prays that within ten (10) days of the entry of the order providing the relief requested above, a Rule Nisi issue herein directed to MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, ordering them to show cause or a date and time to be fixed by this Court why this Court should not find, order and declare that sufficient cause exists for the rehabilitation of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY; and further order and direct the Commissioner, his agents and/or employees to take and/or maintain possessions of all the affairs, property, business, books, records, claim files, account, bank accounts, safety deposit boxes, software, electronic data, e-mail, websites, copyrights, trademarks, patents, and all other assets of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, including all real property and the premises occupied by MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, whether in possession of defendants or their officers, directors, employees, consultants, attorneys, agents, or any other person acting on their behalf to conduct their business and liquidate the same according to law; and why the other relief prayed for and granted herein should not be continued.

WHEREFORE the Commissioner further prays that an order issue herewith appointing Cara Bostick as Receiver of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY.

WHEREFORE, the Commissioner further prays that Mathew Stewart, Norrie Falgoust, Jimmy Henry, and Rudy Babin be appointed as Process Servers for service of all process and further pleadings on MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE

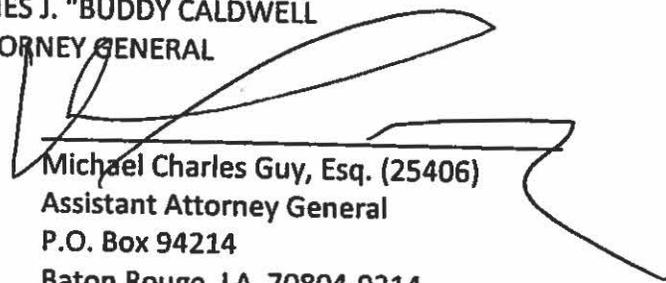
LIFE INSURANCE COMPANY, and for all other appropriate relief.

RESPECTFULLY SUBMITTED,

BY ATTORNEYS FOR
JAMES J. DONELON
Commissioner of Insurance for the State of Louisiana

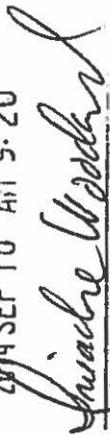
JAMES J. "BUDDY CALDWELL
ATTORNEY GENERAL

By:


Michael Charles Guy, Esq. (25406)
Assistant Attorney General
P.O. Box 94214
Baton Rouge, LA 70804-9214
Telephone (225) 326-6500

FILED
EAST BATON ROUGE PARISH, LA

2014 SEP 10 AM 9:20

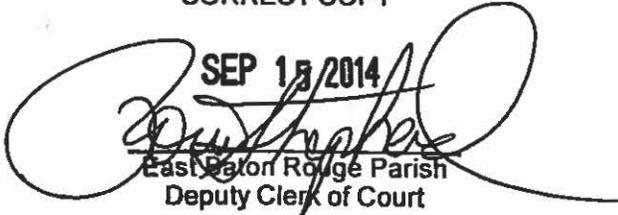

DEPUTY CLERK OF COURT

CIVIL

- 01-DAMAGES
- 02-CONTRACT
- 03-PRISONER SUIT
- 04-EXECUTORY PROCESS
- 05-SUIT ON NOTES
- 06-EVICTION
- 07-WORKERS COMPENSATION
- 08-JUDICIAL REVIEW
- 09-PROPERTY RIGHTS
- 10-INJUNCTION MANDAMUS
- 11-COMM. PROP. PARTITIONS
- 12-PUBLIC SERV. COMM.
- 13-OTHER PARTITIONS
- 14-OTHER
- 15-D.E.Q.
- 16-
- 17-
- 18-
- 19-
- 20-

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SEP 10 2014


East Baton Rouge Parish
Deputy Clerk of Court

{00343071 - v1}

NINETEENTH JUDICIAL DISTRICT COURT
THE PARISH OF EAST BATON ROUGE
STATE OF LOUISIANA

NUMBER:

DIVISION:

JAMES J. DONELON, COMMISSIONER OF INSURANCE
FOR THE STATE OF LOUISIANA

VERSUS

MOTHE LIFE INSURANCE COMPANY
AND ITS WHOLLY OWNED SUBSIDIARY, DLE LIFE INSURANCE COMPANY

FILED: _____

DEPUTY CLERK _____

RULE TO SHOW CAUSE

Considering the foregoing verified Petition for Rehabilitation, Injunctive Relief and Rule to Show Cause filed herein and for cause shown:

IT IS HEREBY ORDERED that a Rule be issued herein directed to MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, ordering them to appear and show cause on the 1 day of October, 2014 at 9:30 o'clock Am., why the preliminary order of rehabilitation and injunctive relief entered in this matter on September , 2014 should not continue in effect and a permanent order of rehabilitation in the form of the preliminary order of rehabilitation in this matter should not be entered.

FILED
EAST BATON ROUGE PARISH, LA
2014 SEP 10 AM 9:00
DEPUTY CLERK OF COURT

Signed this 11 day of Sept, 2014 at Baton Rouge, Louisiana.

Jamie Clark

JUDGE, NINETEENTH JUDICIAL DISTRICT COURT

PLEASE SERVE: BY PRIVATE PROCESS SERVER APPOINTED BY COURT

Mothe Life Insurance Company
Through its agent for service of process
Dennis M. Necaise
401 Whitney Avenue, Suite 303
Gretna, LA 70056

DLE Insurance Company
Through its agent for service of process
Dennis M. Necaise
401 Whitney Avenue, Suite 303
Gretna, LA 70056

CERTIFIED TRUE AND
CORRECT COPY

SEP 15 2014
[Signature]
East Baton Rouge Parish
Deputy Clerk of Court

Trio Sisters, LLC
Through its agent for service of process
William A. Neilson
1100 Poydras Street, Suite 1500
New Orleans, LA 70163-1500

Dawn Gerrets
Individually and
on behalf of Gerrets Family Trust and
on behalf of Charles J.D. Gerrets, III Irrevocable Inter Vivos Trust, No. 1
180 Commerce Street
Gretna, LA 70056

Danna Gerrets Necaïse
Individually and
on behalf of Gerrets Family Trust and
on behalf of Charles J.D. Gerrets, III Irrevocable Inter Vivos Trust, No. 1
117 Commerce Street
Gretna, LA 70056

Beth Gerrets Treadaway
Individually and
on behalf of Gerrets Family Trust and
on behalf of Charles J.D. Gerrets, III Irrevocable Inter Vivos Trust, No. 1
180 Commerce Street
Gretna, LA 70056

Gulf Coast Preneed Agency, Inc.
Through its agent for service of process
Dennis M. Necaïse
401 Whitney Avenue
Suite 303
Gretna, LA 70056

NINETEENTH JUDICIAL DISTRICT COURT
THE PARISH OF EAST BATON ROUGE
STATE OF LOUISIANA

NUMBER: _____

DIVISION: _____

JAMES J. DONELON, COMMISSIONER OF INSURANCE
FOR THE STATE OF LOUISIANA

VERSUS

MOTHE LIFE INSURANCE COMPANY
AND ITS WHOLLY OWNED SUBSIDIARY, DLE LIFE INSURANCE COMPANY

FILED: _____

DEPUTY CLERK _____

AFFIDAVIT AND VERIFICATION

STATE OF LOUISIANA
PARISH OF EAST BATON ROUGE

BEFORE ME, the undersigned notary, and in the presence of the undersigned competent witnesses, personally came and appeared:

CAROLINE BROCK

a competent major, who after being duly sworn, did depose and state:

She is the Deputy Commissioner of Financial Insolvency for the Department of Insurance, State of Louisiana, duly appointed by the Commissioner of Insurance.

She has read the foregoing petition for rehabilitation and the allegations contained therein are true and correct to the best of her knowledge, information and belief.

WITNESSES:

Monick Williams
Monick Williams

Caroline Brock
CAROLINE BROCK

Stacy R. Antie
Stacy R. Antie

Sworn to and Subscribed before me this 9th day of SEPTEMBER 2014.

Mike GUY
NOTARY PUBLIC
MIKE GUY LBN 25406

FILED
EAST BATON ROUGE PARISH, LA
2014 SEP 10 AM 9:20
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CORRECT COPY

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SEP 15 2014
East Baton Rouge Parish
Deputy Clerk of Court

EBR2490855

NINETEENTH JUDICIAL DISTRICT COURT
THE PARISH OF EAST BATON ROUGE
STATE OF LOUISIANA

NUMBER:

DIVISION:

JAMES J. DONELON, COMMISSIONER OF INSURANCE FOR THE STATE OF LOUISIANA
VERSUS
MOTHE LIFE INSURANCE COMPANY
AND ITS WHOLLY OWNED SUBSIDIARY, DLE LIFE INSURANCE COMPANY

FILED: _____

DEPUTY CLERK

EXHIBIT "A"

AFFIDAVIT

STATE OF LOUISIANA
PARISH OF EAST BATON ROUGE

BEFORE ME, the undersigned notary, and in the presence of the undersigned competent witnesses, personally came and appeared:

CAROLINE BROCK

a competent major, who after being duly sworn, did depose and state:

I am the Deputy Commissioner of Financial Solvency for the Department of Insurance, State of Louisiana, duly appointed by the Commissioner of Insurance.

In connection with my duties, I have reviewed the financial statements and the records of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY

The information contained in this affidavit is based on my personal knowledge derived from my review of the financial statement and records of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, and my conversations with my staff.

My review has revealed that MOTHE LIFE INSURANCE COMPANY is insolvent and is in such condition that further transaction of business by MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, would be hazardous to its policyholders, creditors and public.

That the above is true and correct to the best of my knowledge.

WITNESSES:

Monick Williams
monick williams

Stacy R. Antie
Stacy R. Antie

Caroline Brock
CAROLINE BROCK

Sworn to and Subscribed before me this 9th day of September, 2014.

Mike Guy

NOTARY PUBLIC
MIKE GUY (AN 25406)

CERTIFIED TRUE AND
CORRECT COPY

SEP 15 2014

Deputy Clerk
East Baton Rouge Parish
Deputy Clerk of Court

EBR2490886



NINETEENTH JUDICIAL DISTRICT COURT
THE PARISH OF EAST BATON ROUGE
STATE OF LOUISIANA

NUMBER: 033 396

DIVISION: D

JAMES J. DONELON, COMMISSIONER OF INSURANCE
FOR THE STATE OF LOUISIANA

VERSUS

MOTHE LIFE INSURANCE COMPANY
AND ITS WHOLLY OWNED SUBSIDIARY, DLE LIFE INSURANCE COMPANY

FILED: _____

DEPUTY CLERK

STATE
SEP 10 2014
DEPUTY CLERK OF COURT

ORDER OF REHABILITATION AND INJUNCTIVE RELIEF

CONSIDERING the verified petition, law and the evidence entitling the parties to the relief sought, and the Court being satisfied from the allegations therein and finding that the defendant named herein is an insurer as defined in and under Louisiana law and that the interests of creditors, policyholders, and the public would be endangered by delay, and the Court finding that the law and the evidence is in favor of granting the relief prayed for herein,

IT IS ORDERED, ADJUDGED AND DECREED that sufficient cause exists for the rehabilitation of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that MOTHE LIFE INSURANCE COMPANY be and hereby is declared insolvent and MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY. be and are hereby placed in rehabilitation under the direction and control of the Commissioner of Insurance for the State of Louisiana, his successors and assigns in his office and his agents, designees, and/or employees (the "Rehabilitator"), subject to the further written orders of this Court.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the Commissioner, or any designated deputy, be and hereby is appointed Rehabilitator.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that Cara Bostick be and hereby is appointed as Receiver of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY.

EBR2490887

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that Mathew Stewart, Norrie Falgoust, Jimmy Henry, and Rudy Babin be and hereby are appointed as Process Servers for service of all process and further pleadings on MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, and any all other persons or entities for which service may be needed in this matter.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the Commissioner of Insurance as Rehabilitator be and hereby is vested by operation of law with the title to all property, business, affairs, accounts, bank accounts, safety deposit boxes, records and other assets of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, as of the date of this order and he is ordered to direct the rehabilitation of same, until further order of this Court.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the Commissioner as Rehabilitator or his appointees and/or the Receiver or Deputy Receiver be allowed and is authorized to appoint a Receiver and/or Deputy Receiver to employ and authorize the compensation of accountants, clerks, and such assistants as he deems necessary, and authorize the payment of the expenses of these proceedings and the necessary incidents thereof, as approved by the Court, to be paid out of the funds or assets of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, in the possession of the Receiver and/or Rehabilitator or coming into MOTHE LIFE INSURANCE COMPANY's and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY's possession.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that pursuant to La R.S. 22:2002 the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver, his agents and/or employees are directed to immediately take and/or maintain possession and control of the property, business, affairs, bank accounts, safety deposit boxes, computers, all primary and secondary storage media, documents, claims files, software, electronic data, e-mail, websites, books, records, accounts, copyrights, trademarks, patents and all other assets of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, including all real property, whether in the possession of MOTHE LIFE INSURANCE COMPANY

and/or and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, and/or its/their current or former shareholders, officers, directors, employees, servants, consultants, trustees, adjusters, independent contractors, actuaries, accountants, attorneys, subsidiaries, affiliates or agents, and any other partnership, company, or entity controlled by same and/or persons acting for or on behalf of said individuals and companies, and/or any others acting on its/their behalf, and of the premises occupied by the MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, for its/their business.

IT IS FURTHER ORDERED ADJUDGED AND DECREED that any officer, director, manager, employee, trustee or agent of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPAN,Y and any person who possesses or possessed any executive authority over, or who exercises or exercised any control over any segment of MOTHE LIFE INSURANCE COMPANY's and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY's, affairs be required to fully cooperate with the Receiver and/or Deputy Receiver and/or Rehabilitator or his appointees, notwithstanding their dismissal pursuant to the order entered herein.

IT IS FURTHER ORDERED ADJUDGED AND DECREED that the Rehabilitator or his appointees and/or Receiver and/or Deputy Receiver be and hereby are authorized to conduct an investigation of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, and its/their subsidiaries and affiliates to uncover and make fully available to the Court the true state of MOTHE LIFE INSURANCE COMPANY's and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY's, financial affairs. In furtherance of this investigation, MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY/ and its/their parent corporations, its subsidiaries, its affiliates, its current or former owners, officers, directors, managers, trustees, agents, adjusters, attorneys, employees, or independent contractors of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, and its/their third party administrators, be and hereby are required to make all books, documents, accounts, records and affairs, which either belong to or pertain to MOTHE LIFE INSURANCE COMPANY and its wholly owned

subsidiary, DLE LIFE INSURANCE COMPANY, available for full, free and unhindered inspection and examination by the Commissioner or his designee during normal business hours (9:00 a.m. to 5:00 p.m.) Monday through Friday, from the date of the order entered herein. MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, and the above-specified entities shall fully cooperate with the Rehabilitator or his appointees and/or Receiver and/or Deputy Receiver. Such cooperation shall include, but not be limited to, the taking of oral testimony under oath of MOTHE LIFE INSURANCE COMPANY's, and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY's, owners, officers, directors, managers, trustees, agents, adjusters, employees, or independent contractors of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, its/their affiliates and subsidiaries and any other person or entity who possesses any executive authority over, or who exercises any control over, any segment of the affairs of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, in both their official, representative, and individual capacities and the production of all documents that are calculated to disclose the true state of MOTHE LIFE INSURANCE COMPANY's and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY's affairs.

IT IS FURTHER ORDERED ADJUDGED AND DECREED that MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, and/or its/their current or former shareholders, officers, directors, employees, servants, consultants, trustees, adjusters, independent contractors, trustees, adjusters, independent contractors, actuaries, accountants, attorneys, subsidiaries, affiliates or agents, banks, savings and loan association, financial institutions, and any other partnership, company, or entity controlled by same and/or persons acting for or on behalf of said individuals and companies, and/or any others acting on its/their behalf, be and hereby are enjoined from disposing of the property or assets of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, and from the transaction of its/their business except with the concurrence of the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver, until further order of this Court.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver may permit such further operation of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, as he may deem necessary and appropriate and as he may find to be in the best interest of the policyholders of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that all authority of all officers, directors, and managers of MOTHE LIFE INSURANCE COMPANY and DLE LIFE INSURANCE COMPANY, is hereby suspended and vested with the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver until further written order of this Court.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that MOTHE LIFE INSURANCE COMPANY and DLE LIFE INSURANCE COMPANY shall not engage in any solicitation or marketing whatsoever.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, and/or its/their current or former shareholders, officers, directors, employees, servants, consultants, trustees, adjusters, independent contractors, actuaries, accountants, attorneys, subsidiaries, affiliates or agents, banks, savings and loan association, financial institutions, and any other partnership, company, or entity controlled by same and/or persons acting for or on behalf of said individuals and companies, and/or any others acting on its/their behalf, be ordered to immediately surrender and turn over to the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver all property, business, affairs, documents, computers, all primary and secondary storage media, bank accounts, safety deposit boxes, software, electronic data, e-mail, websites, books, records, accounts, and other assets of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, including all real property, and the premises occupied by MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY and be and hereby is enjoined from the transaction of the business of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE

COMPANY, except with the concurrence of the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver until further order of this Court.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, and/or its/their current or former shareholders, officers, directors, employees, servants, consultants, trustees, adjusters, independent contractors, actuaries, accountants, attorneys, subsidiaries, affiliates or agents, and any other partnership, company, or entity controlled by same and/or persons acting for or on behalf of said individuals and companies, and/or any others acting on its/their behalf and/or subject to its/their control, and all other persons or entities who have access to, control or possession of the property, assets, and affairs of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY as follows:

- a) from disposing of or encumbering any of the property or assets of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY;
- b) from disposing of any records of or other documents belonging to MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, or relating to the business and affairs of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY;
- c) from transaction of any business by, for, or on behalf of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, including, but not limited to:
 - i) the writing, issuance or renewal of any insurance policy, binder, or endorsement to an existing policy or certificate of coverage;
 - ii) the payment of claims and of any policy benefits;
 - iii) the incurring of any claim or loss adjustment expense;
 - (iv) the incurring of any debt or liability, except with the concurrence of the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver until further order of this Court; or
 - v) the interfering with the acquisition of possession by the exercise of dominion and control over the property of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY by the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver or interfering with the conduct of the business and affairs of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, by the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver;

except with the concurrence of the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver, until further order of this Court.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that all persons and entities are enjoined and stayed from obtaining preferences, judgments, attachments or other like liens or the making of any levy against MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, its property and assets while in the Rehabilitator's or his appointees' and/or the Receiver or Deputy Receiver's possession and control as of this date of this Order until further orders of this Court.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver be and hereby are allowed and authorized to:

- a) Employ and authorize the compensation of accountants, clerks, attorneys, actuaries, and such assistants as he deems necessary, and authorize the payment of the expenses of these proceedings and the necessary incidents thereof, as approved by the Court, to be paid out of the funds or assets of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, in the possession of the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver or coming into their possession;
- b) Defend or not defend legal actions wherein MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, or the Rehabilitator and/or his appointees and/or the Receiver or Deputy Receiver is a party defendant, commenced prior to or subsequent to the entry of the order herein, without the authorization of the Court, except, however, in actions where MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, is a nominal party, as in certain foreclosure actions, and the action does not affect a claim against or adversely affect the assets of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, the Rehabilitator and/or his appointees and/or the Receiver or Deputy Receiver may file appropriate pleadings in his/their discretion;
- c) Commence and maintain all legal actions necessary, wherever necessary, for the proper administration of this receivership proceeding;
- d) Collect all debts, which are economically feasible to collect and which are due and owing to MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY;
- e) Take possession of all MOTHE LIFE INSURANCE COMPANY's and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY's, securities and certificates of deposit on deposit with the Commissioner of Insurance of the State of Louisiana or any other person or entity, if any, and convert to cash so much of the same as may be necessary, in his judgment, to pay the expenses of administration of this receivership; and
- f) Issue endorsements on existing policies.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that any officer, director, manager, trustee, employee, servant, adjustor, consultant, actuary, accountant, attorney, agent, and/or any person acting for or on behalf of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, and any person who possesses or possessed any executive authority over, or who exercises or exercised any control over any segment of the affairs of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, be and hereby is required to fully cooperate with the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver, notwithstanding their dismissal pursuant to the order entered herein.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that all attorneys employed by MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, as of the date of the order entered herein be and hereby are required within ten (10) days' notice of this order, to report to the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver on the name, company, claim number and status of each file they are handling on behalf of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY. Said report shall also include an account of any funds received from or on behalf of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY; and that all attorneys described herein be and hereby are discharged as of the date of the order entered herein unless the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver retains their services in writing; that all attorneys employed by MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, who are in possession of litigation files or other material, documents or records belonging to or relating to work performed by the attorney on behalf of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, be and hereby are required to deliver such litigation files, material, documents or records intact and without purging to the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver, notwithstanding any claim of a retaining lien, which, if otherwise valid, shall not be extinguished by such turn-over of documents.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that reinsurance premiums due to or payable by MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, be remitted to, or disbursed by the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver or to another party at the discretion of the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver; that the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver shall handle reinsurance losses recoverable or payable by MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, and all correspondence concerning reinsurance be between the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver and the reinsuring company or intermediary unless otherwise requested by the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that upon request by the Rehabilitator or his appointees and or the Receiver or Deputy Receiver, any company providing telephone services to MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, be and hereby is required to provide a referral of calls from the number presently assigned to MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY to any such number designated by the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver or perform any other services or changes necessary to the conduct of the receivership of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that any bank, savings and loan association, financial institution, and any other person or entity which has on deposit, and/or in its possession, custody or control any funds, accounts and any other assets of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, be and hereby is required to immediately transfer title, custody and control of all such funds, accounts, or assets to the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver, and are hereby instructed that the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver has absolute control over such funds, accounts and other assets;

and that the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver may change the name of such accounts and other assets, withdraw them from such bank, savings and loan association or other financial institution or take such lesser action necessary for the proper conduct of this receivership.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that no bank, savings and loan association, or other financial institution shall exercise any form of set-off, alleged set-off, lien, any form of self-help whatsoever, or refuse to transfer any funds or assets to the Rehabilitator's or his appointees and/or the Receiver or Deputy Receiver's control without the permission of this Court.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that any entity furnishing telephone, water, electric, internet, cable, sewage, garbage or trash removal services to MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, be and hereby is required to maintain such service and transfer any such accounts to the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver as of the date of the order entered herein, unless instructed to the contrary by the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that any data processing service which has custody or control of any data processing information and records, including, but not limited to, source documents, data processing cards, input tapes, all types of storage information, master tapes or any other recorded information relating to MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, be and hereby is required to transfer custody and control of such records to the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver. The Rehabilitator or his appointees and/or the Receiver or Deputy Receiver shall compensate any such entity for the actual use of hardware and software, which the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver finds to be necessary to this proceeding. Compensation shall be based upon the monthly rate provided for in contracts or leases with MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, which were in effect when

this proceeding was instituted, or based upon such contracts as may be negotiated by the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver, for the actual time such equipment and software is used by the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the United States Postal Service be and hereby is directed to provide any information requested by the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver regarding MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, and to handle future deliveries of MOTHE LIFE INSURANCE COMPANY's and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY's mail as directed by the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver may conduct an investigation of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, and its/their subsidiaries and affiliates to uncover and make fully available to the Court the true state of MOTHE LIFE INSURANCE COMPANY's and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY's financial affairs. In furtherance of this investigation, MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, and its/their parent, subsidiaries, affiliates, third party administrators, current and/or former owners, shareholders, employees, servants, consultants, trustees, adjusters, independent contractors, actuaries, accountants, attorneys, subsidiaries, affiliates or agents, and any other partnership, company, or entity controlled by same and/or persons acting for or on behalf of said individuals and companies, and/or any others acting on its/their behalf and/or subject to its/their control shall make all books, documents, accounts, records and affairs, which either belong to or pertain to MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, available for full, free and unhindered inspection and examination by the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver during normal business hours (9:00 a.m. to 5:00 p.m.) Monday through Friday, from the date of

the order entered herein. MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, and the above-specified entities shall fully cooperate with the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver. Such cooperation shall include, but not be limited to, the taking of oral testimony under oath of the above-specified entities and any other person or entity who possesses any executive authority over, or who exercises any control over, any segment of the affairs of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY in both their official, representative, and individual capacities and the production of all documents that are calculated to disclose the true state of MOTHE LIFE INSURANCE COMPANY's and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY's, affairs.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that any and all individuals and entities be and hereby are enjoined from instituting and/or taking further action in any suits, proceedings, and seizures against MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver in his capacity as Rehabilitator or his appointees and/or the Receiver or Deputy Receiver of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, and its/their officers, directors, subsidiaries, affiliates, insurers, representatives, third party administrators, employees, servants, consultants, trustees, adjusters, actuaries, accountants, attorneys, to prevent any preference, judgment, seizure, levy, attachment, or lien being rendered against MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, its estate and assets, and/or its insureds and policyholders, the Commissioner in his capacity as Rehabilitator or his appointees and/or the Receiver or Deputy Receiver, any affiliates, subsidiaries, insurers, officers, directors, representatives, agents, employees, or attorneys of same, and the making of any levy against MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, its/their property or assets, until further order of this Court.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that, except with the concurrence of the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver or until further written order of this Court, all suits, proceedings, and seizures against MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY and/or its/their respective policyholders and insured be and hereby are stayed in order to prevent the obtaining of any preference, judgment, seizure, levy, or lien, and to preserve the property and assets of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, including, but not limited to, suits and proceedings and all litigation where:

- a) MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, is a party;
- b) A policyholder or any other person who is named as a party to the litigation or claims insurance coverage under any policy of insurance issued or assumed by MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY;
- c) The litigation involves or may involve the adjudication of liability or determines any possible rights or obligations of any insured, policyholder or person as to any insurance policy issued or assumed by MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, or determines any possible future liability of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, with regard to any insurance policy issued or assumed by MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY;
- d) Where MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, would otherwise be obligated to provide a defense to any party in any court pursuant to any policy of insurance issued or assumed by MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY;
- e) Where the ownership, operations, management and/or control of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY is at issue; and
- f) Any party is seeking to create, perfect or enforce any preference, judgment, attachment, lien or levy against MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY or its/their assets or against any policyholder or insured of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that there shall be no liability on the part of and that no cause of action of any nature shall exist against the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver of MOTHE LIFE INSURANCE COMPANY and

its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, and/or the Attorney General of the State of Louisiana in his capacity as attorney for the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, and/or their representatives, agents, employees, or attorneys, for any action taken by them when acting in accordance with the orders of this Court and/or as Rehabilitator or his appointees and/or the Receiver or Deputy Receiver of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, and that such actions shall be barred.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that after payment of all administrative expenses of rehabilitation, receivership, and/or liquidation, all obligations of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, will be paid pursuant to the orders of this Court according to the applicable law.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that all contracts between MOTHE LIFE INSURANCE COMPANY and DLE LIFE INSURANCE COMPANY and any and all persons or entities providing services to MOTHE LIFE INSURANCE COMPANY and DLE LIFE INSURANCE COMPANY and its policyholders remain in full force and effect, until further order of this Court or unless otherwise notified by the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that any and all individuals and entities be and hereby are enjoined from interfering with these proceedings, or with the Rehabilitator's or his appointees and/or the Receiver or Deputy Receiver's possession and control or title, rights or interest; from interfering with the conduct of the business of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, by the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver; from wasting the assets of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, and from obtaining preferences, judgments, attachments or other like liens or the making of any levy against MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, or its/their property and assets while in the

possession and control of the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver, until further order of this Court.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that all authority of all officers, directors, and managers of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, is hereby suspended and is vested in the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver until further written order of this Court.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that all individuals and entities be and hereby are enjoined from instituting or taking further action in any suit or proceeding against MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver, any affiliates, subsidiaries, insurers, officers, directors, representatives, agents, employees, or attorneys of the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver or MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, its estate and assets, and its policyholders, and from making any levy or seizure against MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, or its/their estates and assets while under the possession and control of the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver until further written order of this Court.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that all premiums and all other debts and payables due to MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, be paid to the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver, until further order of this Court.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver shall notify every holder of a certificate of coverage or contract of insurance issued by MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, and every known creditor of MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, of the

order of rehabilitation and injunction entered herein within sixty (60) days of the date of this order, notwithstanding the provisions of La R.S. 22:2011.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the provisions of the Louisiana Insurance Code and any contractual agreement as to late payment penalties, interest, attorneys fees, adjustments, or other such charges be and hereby are suspended. LSA-R.S. 22: 1811, and 1973.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that premiums and all other debts payable to MOTHE LIFE INSURANCE COMPANY and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, be paid to the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that all contracts between MOTHE LIFE INSURANCE COMPANY and/or its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, and any and all other persons and entities providing services to MOTHE LIFE INSURANCE COMPANY and/or its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, and its/their policyholders and insureds remain in full force and effect until further order of this Court.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that an immediate moratorium be and hereby is placed on policy loans, cash surrenders, sick claims and coupon payments on all policies issued by MOTHE LIFE INSURANCE COMPANY and/or its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY until further order of the Court.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the employees and/or directors, and/or agents of MOTHE LIFE INSURANCE COMPANY and/or its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY, be and hereby are barred from attempting to sell the book of business of MOTHE LIFE INSURANCE COMPANY and/or its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY. without the consent of the Commissioner as Rehabilitator or his appointees and/or the Receiver or Deputy Receiver and the Louisiana Guaranty Association.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the Rehabilitator or his appointees and/or the Receiver or Deputy Receiver shall be granted all legal and equitable relief as may be necessary to fulfill duties as Rehabilitator or as his appointees and/or as

Receiver or Deputy Receiver and for such other relief as the nature of the case and the interest of MOTHE LIFE INSURANCE COMPANY's and its wholly owned subsidiary, DLE LIFE INSURANCE COMPANY's, policyholders, creditors, or the public, may require.

Baton Rouge, Louisiana, this 11 day of Sept, 2014.



JUDGE, NINETEENTH JUDICIAL DISTRICT COURT

FILED
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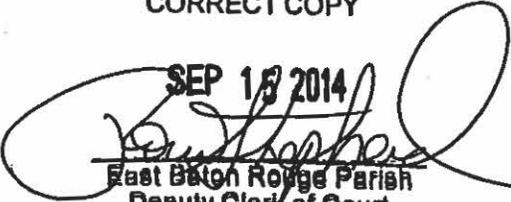
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