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January 27, 2014

VIA ELECTRONIC FILING

The Honorable Joel H. Peck, Clerk
State Corporation Commission
Tyler Building - 1st Floor
1300 East Main Street
Richmond, Virginia 23219

ATTN.: DOCUMENT CONTROL CENTER

Re: Commonwealth of Virginia ex rel. State Corporation Commission v. Southern Title Insurance Corporation; Case No. INS-2011-00239; Our File No. 62000-002

Dear Mr. Peck:

On behalf of the Jacqueline K. Cunningham, Deputy Receiver of Southern Title Insurance Corporation, please find attached for e-filing the following pleading:

DEPUTY RECEIVER'S MOTION FOR CONTINUANCE

Thank you for your kind assistance in regard to this matter. Please let us know if you have any questions.

Respectfully submitted,



Michael P. Marcin
Counsel to the Deputy Receiver

MPM:jmw
Attachment

cc: All Parties of Record

COMMONWEALTH OF VIRGINIA
STATE CORPORATION COMMISSION

COMMONWEALTH OF VIRGINIA *ex rel.*
STATE CORPORATION COMMISSION,

Applicant,

v.

SOUTHERN TITLE INSURANCE
CORPORATION

Respondent.

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Case No. INS-2011-00239

DEPUTY RECEIVER'S MOTION FOR CONTINUANCE

TO THE HONORABLE JUDGES OF THE COMMISSION:

Jacqueline K. Cunningham, Commissioner of Insurance, Bureau of Insurance, State Corporation Commission of the Commonwealth of Virginia (the "Commission"), in her capacity as Deputy Receiver (the "Deputy Receiver") of Southern Title Insurance Corporation ("Southern Title" or the "Company"), in receivership, respectfully submits this Motion for Continuance of the "Application for Orders Setting Hearing on Liquidation of Southern Title Insurance Corporation, Establishing Response Dates, Ordering Liquidation, Approving Claims Filing Deadline, and Related Matters" presently scheduled to be heard on February 4, 2014, starting at 10:00 A.M., and represents to the Commission as follows

I.

1. On October 4, 2013, an Application for Orders Setting Hearing on Liquidation of Southern Title Insurance Corporation, Establishing Response Dates, Ordering Liquidation, Approving Claims Filing Deadline, and Related Matters was filed in this cause seeking, *inter alia*, entry of a liquidation order.

2. On October 18, 2013, the Commission entered its Scheduling Order approving the proposed notice procedures for this hearing and setting the matter to be heard on February 4, 2014, starting at 10:00 A.M. Pursuant to the Scheduling Order, the Deputy Receiver was directed to provide direct written notice of the liquidation hearing to all creditors, claimants, and policyholders for whom Southern Title's records provided a valid mailing address.

3. As described in the application, Southern Title's records were not set up to capture mailing addresses and instead mostly contained legal descriptions. Further, much of the information was inaccessible in that it would have required hand transcriptions of over one million paper, micro-film, and electronic policy records. The cost of such a project would have exhausted a considerable portion of Southern Title's available assets.

4. Accordingly, written notice was sent to over 30,000 addresses of policyholders, vendors, and other creditors of the estate, and the notice was published in national and regional publications as required by the Scheduling Order. Inadvertently, the database of addresses for current claimants was missed, and many of the parties in this group were not notified of the hearing.

5. While a substantial number of these claimants may have received notice due to also being listed in the policyholder database, a substantial number of these parties did not receive the required notice.

6. No objections were filed to the original application.

7. The Deputy Receiver seeks a continuance of seventy-five (75) days to notice these parties and to allow objections to be filed by this group of omitted policyholders. Notice of the new hearing date will be sent to this group as soon as the date is set.

8. In accordance with the Scheduling Order, the Deputy Receiver required that all persons interested in receiving future notices of receivership proceedings must opt-in by registering with the Deputy Receiver. All persons or entities who so registered with the Deputy Receiver will also receive direct notice of the date of the continued hearing.

WHEREFORE, PREMISES CONSIDERED, the Deputy Receiver respectfully requests that the Commission enter an order continuing this matter for SEVENTY-FIVE (75) DAYS and rescheduling the hearing to occur shortly thereafter.

Respectfully submitted,

Jacqueline K. Cunningham, Commissioner of Insurance, State Corporation Commission, Bureau of Insurance, as Deputy Receiver of Southern Title Insurance Corporation

By:



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Counsel for the Deputy Receiver

CERTIFICATE OF SERVICE

I hereby certify that on January 27, 2014, the foregoing document was filed electronically with the Clerk of the Commission:

Mr. Joel Peck
Clerk of the Commission
STATE CORPORATION COMMISSION
Tyler Building
1300 E. Main Street
Richmond, Virginia 23219

and one copy was sent via overnight delivery to the following:

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and one copy was sent via United States mail, postage prepaid, to the following:

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