

FILED
01-04-2024
CIRCUIT COURT
DANE COUNTY, WI
2023CV001310

STATE OF WISCONSIN

CIRCUIT COURT

DANE COUNTY

In the Matter of the Rehabilitation of:

Wisconsin Reinsurance Corporation and 1st Auto &
Casualty Insurance Company
c/o: Office of the Commissioner of Insurance
125 South Webster Street
Madison, WI 53703

Case No. 2023CV1310

Case Code: 30703

BY: The Wisconsin Insurance Security Fund
2820 Walton Commons West
Suite 135
Madison, WI 53718-6797

APPLICATION FOR INJUNCTIVE ORDER

(Wis. Stat. § 646.15)

Allan Patek (“Applicant”), the Executive Director of the Wisconsin Insurance Security Fund (“WISF”), on behalf of WISF, hereby submits this application for an injunctive order under Wis. Stat. § 646.15.

1. The Applicant is the Executive Director of WISF and, on behalf of WISF, makes this verified application for an injunction and related relief in accordance with Wis. Stat. § 646.15, and the provisions of chapters 645 and 646.

2. Wisconsin Reinsurance Corporation (“WRC”) and its wholly owned subsidiary, 1st Auto & Casualty Insurance Company (“1st Auto”) are Wisconsin domestic, stock, property and casualty insurance companies that were licensed to do business in Wisconsin and have carried out insurance businesses in Wisconsin before the commencement of the current rehabilitation and liquidation proceedings.

3. On January 2, 2024, upon the Notice of Verified Petition and Verified Petition to Terminate Rehabilitation and for Order for Liquidation of Wisconsin Reinsurance Corporation

and 1st Auto & Casualty Insurance Company asserted by Nathan Houdek, Commissioner of Insurance of the State of Wisconsin (“Commissioner”), this Court entered an Order Terminating Rehabilitation and Order for Liquidation with Finding of Insolvency, effective January 1, 2024 (Dkt. No. 22, “Liquidation Order”), placing WRC and 1st Auto into liquidation and appointing Commissioner Houdek as Liquidator of WRC and 1st Auto.

4. The Liquidation Order is a final order of liquidation.

5. The applicant believes that under the facts set forth in the accompanying Affidavit, the issuance of an injunction by this Court is necessary and proper.

WHEREFORE, the applicant petitions for an order establishing a protective injunction, pursuant to Wis. Stat. § 646.15(1)(a), as set forth in the accompanying proposed Order.

Dated: January 4, 2024.

WISCONSIN INSURANCE SECURITY FUND

By: 
Allan Patek, Executive Director

STATE OF WISCONSIN)
) ss.
COUNTY OF DANE)

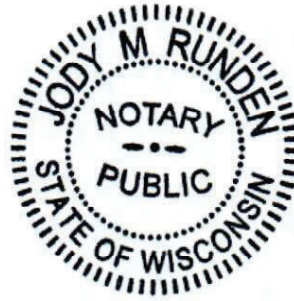
Allan Patek, being first duly sworn on oath, deposes and says that he is the applicant in the above-entitled action, that he has been duly authorized by the Board of Directors of the Wisconsin Insurance Security Fund to make this application, that he has read the foregoing application and knows the contents thereof, and that the same is true to his own knowledge.


Allan Patek

Subscribed and sworn to before me this
4th day of January, 2024.

Jody M Runden

Notary Public, Dane County, Wisconsin
My Commission expires October 26, 2025



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