

**FILED****JAN 15 2026**

DANE COUNTY CIRCUIT COURT

**STATE OF WISCONSIN****CIRCUIT COURT  
BRANCH 15****DANE COUNTY**

In the Matter of the Liquidation of:

**Wisconsin Reinsurance Corporation and 1<sup>st</sup>  
Auto & Casualty Insurance Company****Case No. 2023-cv-001310  
Policy No.: PAIA001916  
Insured: Angela M. Clark  
Claim No. 0000122278**

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**OBJECTION TO LIQUIDATOR'S CLAIM DETERMINATION  
AND REQUEST FOR PAYMENT OF FEE INVOICE**

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Gross Welch Marks Clare PC, LLC ("Gross Welch") respectfully objects to the Liquidator's previous recommendation declining payment to Gross Welch; pursuant to Wis. Stat. § 645.65, Gross Welch requests payment for its services rendered.

**TIMELINE**

1. On April 2, 2022, the minor, V.R.V., sustained injuries in a vehicular accident in which V.R.V. was the driver of a vehicle that collided with a vehicle driven by Madelyn Rablin, (insured), the settling party, insured with 1st Auto & Casualty Insurance ("1st Auto").
2. On January 23, 2023, a hearing was held in the Iowa District Court for Pottawattamie County (Council Bluffs, Iowa); Gross Welch appeared on behalf of 1st Auto and its insured. The Court approved a \$50,000 settlement from 1st Auto to the minor.
3. On January 30, 2023, Gross Welch received the \$50,000 settlement check from 1st Auto to be paid to the Conservator on behalf of the minor.
4. On April 13, 2023, Gross Welch sent an invoice (attached hereto as Exhibit "A") to 1st Auto for services rendered through March 31, 2023,

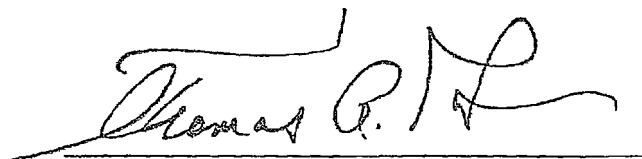
totaling \$6,188.50.

5. Gross Welch did not receive payment for these services; therefore, on December 11, 2023, Gross Welch sent an additional request to 1st Auto to pay the bill for services rendered through March 31, 2023, totaling \$6,188.50.
6. By order of this Court on January 1, 2024, 1st Auto was placed in liquidation pursuant to Wis. Stat. § 645.41.
7. On January 2, 2024, Gross Welch received notice of liquidation for 1st Auto and instructions to submit a proof of claim to obtain payment. The notice was inadvertently not properly addressed or processed internally at Gross Welch in order to complete and file the proof of claim by the bar date of July 1, 2024.
8. On December 1, 2025, Gross Welch submitted a proof of claim for the amount of \$6,188.50 per the instructions stated in the notice.
9. By a letter dated December 4, 2025, the Liquidator informed Gross Welch that its proof of claim was considered to be filed late, resulting in the claim being classified as a Class 8 claim under Wis. Stat. § 645.68. The letter further stated that, pursuant to Wis. Stat. § 645.65, Gross Welch may file an objection with this Court within 60 days of receiving the notice. As a result, Gross Welch files this objection.
10. The compensation of the undersigned (Thomas A. Grennan) is directly related to the payment of the fees (\$6,188.50) rightfully earned by the Gross Welch Law Firm.

### OBJECTION AND REQUEST

For the reasons stated herein, Gross Welch objects to the Liquidator's determination set forth in the December 4, 2025 notice. Pursuant to Wis. Stat. § 645, Gross Welch respectfully requests payment in the amount of \$6,188.50 for the services rendered by Gross Welch on behalf of 1st Auto and its insured.

Dated this 9 day of January, 2026.



Thomas A. Grennan  
GROSS WELCH MARKS CLARE,  
P.C., L.L.O.  
1500 Omaha Tower  
2120 South 72<sup>nd</sup> Street  
Omaha, NE 68124  
(402) 392-1500  
[tgrennan@gwmclaw.com](mailto:tgrennan@gwmclaw.com)

14833-3/#GS65878



1st Auto & Casualty Insurance Company  
 Attn: Richard Smolnicky  
 P.O. Box 7988  
 Madison, WI 53707-7988

rsmolnicky@1stauto.com

For Services Rendered through March 31, 2023

1500 Omaha Tower  
 2120 South 72nd Street  
 Omaha, NE 68124  
 (402) 392-1500  
 www.gwmclaw.com

Tax ID 47-0629927

## Invoice

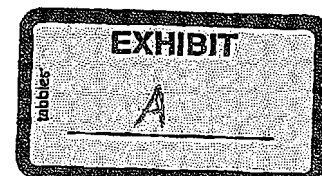
April 13, 2023  
 Invoice 208147  
 Client 014833

### Settlement of Minor Claim - Valdez, Veronica Rodriguez (000003)

Current Fees	2,537.50	
Current Disbursements	9.60	
<b>Total Current Charges</b>		<b>2,547.10</b>
<b>Total Fees and Disbursements</b>		<b>\$2,547.10</b>
<b>Prior Balance</b>		<b>\$3,641.40</b>
<b>Amount Due</b>		<b>\$6,188.50</b>

Accounts Receivable Aging					
0-29	30-59	60-89	90-119	120+	Total Due
2,547.10	0.00	341.05	0.00	3,300.35	6,188.50

Attorney-Client Privileged Communication



**Gross Welch Marks Clare, PC, LLO**

1st Auto & Casualty Insurance Company  
 Invoice 208147

April 13, 2023

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**Re: Settlement of Minor Claim - Valdez, Veronica Rodriguez (000003)**

Fees				
Date	Atty	Description	Hours	Amount
01/13/23	TAG	Review of file as to upcoming conservatorship hearing.	0.20	35.00
01/13/23	TAG	Telephone conference with Ben Knowles re upcoming hearing, bank depository, liens or subrogation interests, and payee information.	0.20	35.00
01/13/23	TAG	Correspondence to Richard Smolnicki requesting settlement check to be issued.	0.20	35.00
01/13/23	TAG	Telephone conference with attorney Ben Knowles (counsel for Conservator) re settlement check, payment of attorney fees, subrogation lien.	0.20	35.00
01/13/23	TAG	Receipt and review correspondence from Ben Knowles re settlement check, and providing copy of his firm's W-9.	0.20	35.00
01/13/23	TAG	Correspondence to Rick Smolnicki (1st Auto) requesting settlement check be issued, and forwarding W9 form for Knowles Law Firm.	0.30	52.50
01/16/23	TAG	Receipt and review correspondence from attorney Ben Knowles (counsel for Conservator) re entry of appearance by Iowa attorney on behalf of conservator.	0.20	35.00
01/16/23	TAG	Receipt and review Entry of Appearance filed by attorney Mike Reilly on behalf of Conservator.	0.20	35.00
01/17/23	TAG	Drafting of Parent's and Conservator's Release.	0.90	157.50
01/19/23	TAG	Review of file as to upcoming hearing; review of matters to be included in proposed Order(s) for submission to the Court at the time of the conservatorship hearing.	0.90	157.50
01/20/23	TAG	Telephone conference with claimant's counsel, Ben Knowles, re nature and extent of claimant's injuries for inclusion in proposed order.	0.20	35.00
01/20/23	TAG	Receipt and review correspondence from attorney Ben Knowles with suggested change in proposed Order to include language regarding Mike Reilly's engagement for Conservator.	0.20	35.00
01/20/23	TAG	Drafting of proposed Order (for submission to Iowa District Judge) appointing conservator, approving previously-filed conservatorship pleadings, approving settlement, and otherwise authorizing conservator to proceed forward and settle claims.	2.20	385.00

**Gross Welch Marks Clare, PC, LLO**

1st Auto & Casualty Insurance Company  
 Invoice 208147

April 13, 2023  
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<b>Fees</b>				
<b>Date</b>	<b>Atty</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
01/20/23	TAG	Correspondence to attorneys Ben Knowles and Mike Reilly forwarding drafts of Order Re Appointment of Conservator and Approval of Settlement (allowing for \$10,000 purchase of vehicle); Alternate Order Re Appointment of Conservator and Approval of Settlement (disapproving allocation of \$10,000 for car), and draft of Parents and Conservator's Release; requesting their approval on same, and whether there is a need for an interpreter for the hearing.	0.30	52.50
01/22/23	TAG	Correspondence to attorney Ben Knowles and Mike Reilly re making changes in proposed order.	0.20	35.00
01/22/23	TAG	Receipt and review correspondence from attorney Ben Knowles re possible testimony at hearing and whether the judge or attorneys will conduct said testimony.	0.20	35.00
01/22/23	TAG	Correspondence to Ben Knowles re testimony conducted at hearing.	0.20	35.00
01/22/23	TAG	Receipt and review correspondence from attorney Mike Reilly re judge will like not conduct testimony, but may require evidence as to request for funds for car.	0.20	35.00
01/22/23	TAG	Review of file; review of suggested change to order; preparation for upcoming hearing on appointment of conservator and approval of settlement; review of conservatorship pleadings filed thus far.	1.20	210.00
01/23/23	TAG	Travel to and from Pottawattamie County Courthouse (Council Bluffs, Iowa) for hearing on conservatorship.	0.50	87.50
01/23/23	TAG	Receipt and review Order Appointing Conservator and Approving Settlement (signed by Judge Heckerman).	0.20	35.00
01/23/23	TAG	Conference with attorneys Reilly and Knowles before hearing on Motion to Appoint Conservator and Motion to Approve Settlement; discussion of potential testimony which may be required; appearance before the Honorable District Judge Heckerman; conference with claimant's counsel after hearing.	2.40	420.00
01/24/23	TAG	Correspondence to Richard Smolnick (1st Auto) forwarding signed Order Approving Conservator and Approving Settlement; requesting settlement check be issued, and providing copy of release to be signed by Conservator.	0.30	52.50
01/24/23	TAG	Receipt and review correspondence from attorney Mike Reilly re Conservator signing a document called Court Officers Oath, and the Court's issuance of Letters.	0.20	35.00
01/24/23	TAG	Receipt and review Court Officer's Oath Signed by Conservator and filed with the Court.	0.20	35.00

**Gross Welch Marks Clare, PC, LLO**

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**Fees**

Date	Atty	Description	Hours	Amount
01/26/23	TAG	Receipt and review Letters of Appointment for Conservator.	0.20	35.00
01/26/23	TAG	Receipt and review correspondence from attorney Ben Knowles re status of settlement check from 1st Auto.	0.20	35.00
01/26/23	TAG	Correspondence to attorney Ben Knowles re renewing our request to 1st Auto for settlement check.	0.20	35.00
01/30/23	TAG	Telephone conference with Rick Smolnicky re settlement check from 1st Auto.	0.20	35.00
01/30/23	TAG	Correspondence to attorney Ben Knowles and advise that settlement check from 1st Auto is being sent by overnight courier.	0.20	35.00
01/31/23	TAG	Correspondence to attorney Ben Knowles that settlement check was not received today.	0.10	17.50
02/01/23	TAG	Receipt of Settlement Check from 1st Auto.	0.10	17.50
02/01/23	TAG	Correspondence to attorney Ben Knowles forwarding settlement check from 1st Auto.	0.20	35.00
02/01/23	TAG	Telephone conference with attorney Ben Knowles re settlement check and other matters.	0.20	35.00
02/03/23	TAG	Receipt and review of Parent's and Conservator's Release signed by Conservator.	0.20	35.00
02/27/23	TAG	Receipt and review Proof of Deposit of Settlement Proceeds filed by Conservator.	0.20	35.00
03/16/23	TAG	Correspondence to Richard Smolnicky (1st Auto) re approval of settlement, forwarding copies of all conservatorship documents, and copy of Parent's and Special Conservator's Release.	0.30	52.50

**Fee Recap**

			Rate	Hours	Amount
TAG	Grennan, Thomas A.	Shareholder	175.00	14.50	2,537.50
<b>Total Fees</b>				<b>14.50</b>	<b>\$2,537.50</b>

**Disbursements**

Date	Description	Amount
01/01/23	Filing Fee Petition for Appointment of Conservator 11/30/22 - Iowa Judicial Branch Photocopy	-15.00
		24.60
<b>Total Disbursements</b>		<b>\$9.60</b>

**Gross Welch Marks Clare, PC, LLO**

**1st Auto & Casualty Insurance Company**  
**Invoice 208147**

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**Total Current File Charges \$2,547.10**



**REMITTANCE PAGE**

1st Auto & Casualty Insurance Company  
Attn: Richard Smolnicky  
P.O. Box 7988  
Madison, WI 53707-7988

April 13, 2023  
Invoice 208147

**Please Remit this Page with Payment**

Client Code: 014833  
Matter Code: 000003

Total Fees and Disbursements **\$2,547.10**

Prior Balance **\$3,641.40**

Amount Due **\$6,188.50**

Payment Amount

*Please make payment upon receipt.*

**Please mail payment to:**

Gross Welch Marks Clare, PC, LLO  
1500 Omaha Tower  
2120 South 72nd Street  
Omaha, NE 68124

*Thank you for your business!*

**Payment by Credit Card**

*For your convenience, Gross Welch Marks Clare, PC, LLO accepts Visa, MasterCard, and Discover. If you wish to make your payment by credit card, please complete and return in the enclosed envelope or call (402) 392-1500 to pay by phone.*

Card Type: Visa MasterCard Discover AmEx

Cardholder Name (if different from above) \_\_\_\_\_

Card Number \_\_\_\_\_

Exp Date \_\_\_\_\_ V-Code \_\_\_\_\_ Billing Zip Code \_\_\_\_\_

Cardholder Signature \_\_\_\_\_

11/30/22, 12:58 PM

State of Iowa - Judicial Branch EDMS



CC 14833.3

Electronic Payment Solutions

[Exit](#)

## Confirmation

Please keep a record of your Confirmation Number, or [print this page](#) for your records.

Confirmation Number **IOWJU3012123772**

### Payment Details

Description Judicial Branch  
Iowa Judicial Branch  
<http://www.iowacourtsonline.org/>

Payment Amount \$15.00

Payment Date 11/30/2022

Status PROCESSED

### Payment Method

Payer Name Thomas Grennan

Card Number \*2080

Card Type Visa

Approval Code 030856

Confirmation Email [tgrennan@gwmdaw.com](mailto:tgrennan@gwmdaw.com)

### Billing Address

Address 1 2120 South 72nd Street, Suite 1500

City/Town OMAHA

State/Province/Region NE

Zip/Postal Code 68124

Country United States

<https://epayment.epymt.service.com/main/paymentconfirmation/paymentConfirmation>

1/1



RECEIVED

JAN 15 2026

DANE COUNTY CIRCUIT COURT

**eGoldFax****Fax Cover Page****Date:** 15 Jan 2026 10:29**To:** +16082664079**From:** csnyder@gwmclaw.com**Fax Number:** +16082664079**Pages:** 11 Including Cover Sheet**Subject:** Wisconsin Reinsurance Corporation and 1st  
Auto & Casualty Insurance Liquidation -  
Case No. 2023-cv-001310**Message:**

Please see the attached Objection for filing in Case No. 2023-cv-001310.

Thank you!!



Cheri Snyder  
Legal Administrative Assistant

[gwmclaw.com](http://gwmclaw.com)

P(402)392-1500

F(402)392-8101

1500 Omaha Tower • 2120 South 72nd Street • Omaha, NE 68124

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