

FILED**MAR 12 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 1st
Auto & Casualty Insurance Company

Case No. 2023-cv-001310
Policy No.: PAIA001916
Insured: Angela M. Clark
Claim No. 0000122278

**REPLY OF GROSS WELCH MARKS CLARE PC, LLO TO
“LIQUIDATOR’S RESPONSE TO OBJECTION TO
LIQUIDATOR’S CLAIM DETERMINATION”**

For its Reply to the “Liquidator’s Response to Objection to Liquidator’s Claim Determination” (filed on or about February 24, 2026), Gross Welch Marks Clare PC, LLO (“Gross Welch”) states as follows:

1. Gross Welch incorporates herein by reference, as is fully set forth herein, its “Objection to Liquidator’s Claim Determination and Request for Payment of Fee Invoice” [as filed with this Court on January 15, 2026].

2. As to the Liquidator’s “Determination of Untimeliness” the undersigned simply states and reinforces that the Gross Welch Law Firm is not a large law firm and its accounting staff is not accustomed to Liquidation proceedings involving insurance companies.

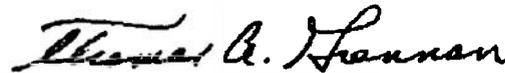
3. Gross Welch appreciates the following statement contained in the Liquidator’s response:

“If, upon approval of a final plan of distribution by this Court, the Liquidator has claims-paying resources sufficient to pay class eight claims, Gross Welch’s claim will be paid, in whole or in part, on a *pro rata* basis together with all other class eight claims.”

4. The undersigned does not purport to understand all of the mechanics of the liquidation process in Wisconsin; however, the undersigned requests that this honorable Court find that the Gross Welch Law Firm did, indeed, provide valuable legal services to an insured of 1st Auto & Casualty Insurance Company, and that the Gross Welch Law Firm should not be penalized because of any alleged inadvertent failure to file a claim within a specific time frame.

WHEREFORE, Gross Welch renews its earlier request for payment of fee invoice and requests that an order be entered requiring the Liquidator to pay the Gross Welch Law Firm the total sum of \$6,188.50.

Dated this 12th day of March, 2026.



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