

FILED
02-12-2026
CIRCUIT COURT
DANE COUNTY, WI
2023CV001310

STATE OF WISCONSIN : CIRCUIT COURT : DANE COUNTY
BRANCH 15

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

**NOTICE OF MOTION AND MOTION TO APPROVE APPOINTMENT OF SPECIAL
DEPUTY LIQUIDATOR**

TO: All Interested Parties

NOTICE

PLEASE TAKE NOTICE that the Commissioner of Insurance of the State of Wisconsin, Nathan Houdek, as Liquidator of Wisconsin Reinsurance Corporation and 1st Auto Casualty Insurance Company (the “Commissioner” or the “Liquidator”), brings this Motion to Approve Appointment of Special Deputy Liquidator (the “Motion”) for hearing, if necessary, before the Circuit Court for Dane County, in the Dane County Courthouse, 215 S. Hamilton Street, Madison, Wisconsin, on a date and at a time to be determined by the Court. Objections to the Motion, along with supporting documentation, shall be filed with the Court and served on the Commissioner, by his attorneys, James A. Friedman, Zachary P. Bemis, and Anthony S. Baish of Godfrey & Kahn, S.C., and any other party who has filed an appearance in this action, within seven days of the filing of the Motion.

MOTION

Nathan Houdek, Commissioner of Insurance of the State of Wisconsin, as Liquidator of Wisconsin Reinsurance Corporation and 1st Auto Casualty Insurance Company (“the “Commissioner” or the “Liquidator”), hereby moves the Court, pursuant to Wis. Stat. § 645.46 and chapter 645 generally, for an Order approving the appointment of James Gerber as Special Deputy Liquidator for purposes of carrying out the liquidation. As grounds for this Motion, the Commissioner states as follows:

1. On June 21, 2023, the Court entered an Order for Rehabilitation (Dkt. No. 12; the “Rehabilitation Order”) of Wisconsin Reinsurance Corporation and 1st Auto Casualty Insurance Company (collectively, the “Companies”).

2. The Rehabilitation Order appointed the Commissioner as the Rehabilitator of the Companies, and it recognized his powers, authorities, and protections under Wis. Stat. chapter 645.

3. The Rehabilitation Order also specified that the “Rehabilitator shall appoint Justin Schrader, of Noble Consulting Services, Inc., as Special Deputy Commissioner for the purposes of carrying out the rehabilitation,” and recognized Mr. Schrader’s powers, authorities, and protections under Wis. Stat. chapter 645.

4. Pursuant to the Rehabilitation Order and his authority under Wis. Stat. § 645.33, the Commissioner contracted with Noble Consulting Services, Inc. (“Noble Consulting”) for Mr. Schrader’s services as Special Deputy Commissioner and for other services, such as tax accounting, preparation of financial statements, and related services necessary to carry out the rehabilitation.

5. On January 2, 2024, the Court entered an Order Terminating Rehabilitation and Order for Liquidation with Finding of Insolvency (Dkt. No. 22; the “Liquidation Order”).

6. The Liquidation Order appointed the Commissioner the Liquidator of the Companies and recognized his powers, authorities, and protections under Wis. Stat. chapter 645.

7. The Liquidation Order also specified that the “Liquidator shall appoint Justin Schrader, of Noble Consulting Services, Inc., as Special Deputy Liquidator for the purposes of carrying out the liquidation,” and recognized Mr. Schrader’s powers, authorities, and protections under Wis. Stat. chapter 645.

8. As permitted by the Liquidation Order, Mr. Schrader fulfilled his duties as Special Deputy Liquidator from the time of his appointment to the present with the assistance of other Noble Consulting personnel, including James Gerber, who has been intimately involved in Noble Consulting’s work in this liquidation.

9. Mr. Schrader recently has left Noble Consulting, and the Commissioner requests that Mr. Gerber be appointed Special Deputy Liquidator as his successor. Mr. Gerber served in the State of Michigan’s Department of Insurance and Financial Services for nearly twenty-six years, from October 1996 to July 2022, retiring as the Director of Receiverships. In that capacity, he presided over fifteen domestic insurer receiverships, including both rehabilitations and liquidations. His duties included supervision over the daily operations of rehabilitations and liquidations, hiring and managing outside consultants (including firms filling the role Noble Consulting fills in this proceeding), preparing and reviewing reports to the courts overseeing those proceedings, and advising on strategies to maximize resources of liquidated insurers for the benefit of claimants. Mr. Gerber joined Noble Consulting in July 2022, and he has worked closely with Mr. Schrader on the present rehabilitation and liquidation since October 2023.

10. The Commissioner hereby seeks authorization from the Court, pursuant to Wis. Stat. § 645.46(1), to appoint James Gerber of Noble Consulting Services, Inc. as Special Deputy Liquidator, without bond, for purposes of carrying out the liquidation of the Companies, with compensation, benefits, and reimbursement of administrative expenses paid from the liquidation estate.

Dated this 12th day of February, 2026.

GODFREY & KAHN, S.C.

By: Anthony S. Baish
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