

IN THE CIRCUIT COURT OF COLE COUNTY, MISSOURI

ANGELA L. NELSON, Director,
Department of Commerce and Insurance of the
State of Missouri,

Plaintiff,

v.

CAMERON MUTUAL INSURANCE COMPANY,

Defendant.

Case No. 23AC-CC04735

ORDER APPROVING FIRST EARLY ACCESS DISTRIBUTION

The Court, having considered the *Motion for Approval of First Early Access Distribution* (“Motion”) filed by Plaintiff Angela L. Nelson, the Director of the Missouri Department of Commerce and Insurance, in her capacity as liquidator (“Liquidator”) of Cameron Mutual Insurance Company (“Cameron Mutual”) determines the Motion should be GRANTED. Accordingly, the Court finds and ORDERS:

1. This Court placed Cameron Mutual into liquidation effective December 1, 2023, in its Judgment, Decree, and Final Order of Liquidation (“Liquidation Order”) and appointed the Director of the Missouri Department of Commerce and Insurance as Liquidator. On December 26, 2023, the Court entered an Order Finding Cameron Mutual Insolvent.

2. Prior to the entry of the Liquidation Order, Cameron Mutual wrote insurance in Iowa, Arkansas, and Missouri. As a result of the Liquidation Order, the Missouri Property and Casualty Insurance Guaranty Association (“Missouri GA”), the Iowa Insurance Guaranty Association (“Iowa GA”), and the Arkansas Property & Casualty

Guaranty Fund (“Arkansas GA”) (the “Participating Associations”) have obligations, subject to statutory conditions and limitations on coverage and applicability, to policyholders who reside within their respective jurisdictions.

3. The Liquidator entered into an Early Access Agreement with the Participating Associations on December 12, 2024, which requires the Participating Associations to, upon notice, return to the Liquidator such assets from prior early access distribution(s) as may be needed to ensure compliance with the priority distribution statute, §375.1218 and to provide reports to the Liquidator accounting for any disbursements pursuant to §375.1205.2(5).

4. On December 17, 2024, the Liquidator filed a Motion to Approve Proposal for Early Access Agreement (“Early Access Plan”), including the Early Access Agreement under § 375.1205, RSMo which this Court approved on December 24, 2024.

5. The Liquidator’s Motion and the proposed distribution are timely under §375.1205.2(2).

6. The Liquidator must hold in the Estate funds necessary to satisfy all anticipated Class 1 expenses under § 375.1218, RSMo and payment of claims of secured creditors before making any early access distributions. § 375.1205.2(1), RSMo.

7. There are sufficient assets in the Estate to pay an early access distribution to the Participating Associations and to cover the projected Class 1 expenses and secured claim. The Liquidator estimates total Class 1 administrative expenses and costs through the conclusion of the liquidation and the amount of secured claims to be \$6,649,245 which

includes a projection of the non-adjudicated, potential Class 1(f) expense claims totaling \$2,479,779 and secured claims in the amount of \$11,284.

8. The Liquidator has determined the available assets, excluding assets reserved for Class 1 expenses, for purposes of evaluating distribution to be \$4,000,000.

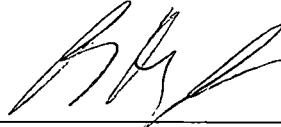
9. The Commissioners of Insurance for the States of Missouri, Arkansas, and Kansas, and the Participating Associations have received notice of the Motion and have waived the requirements for service by certified mail and 30-days' advance prior notice.

10. No objections have been made to the Motion.

IT IS HEREBY ORDERED, ADJUDGED AND DECREED that:

- a. The Liquidator's Motion for Approval of First Early Access Distribution is granted;
- b. The Liquidator is authorized to make an initial early access distribution in the amount of \$4,000,000, of which \$3,330,580.55 shall be paid to the Missouri GA, \$188,425.11 shall be paid to the Iowa GA, and \$480,994.34 shall be paid to the Arkansas GA within fourteen days following entry of this Order Approving First Early Access Distribution;
- c. The Liquidator's reference to the Participating Associations' reported payments and expenses, and the Liquidator's reserve for potential Class 1(f) expenses does not constitute approval of the Participating Associations' claims, expenses, or reports; and
- d. Pursuant to the Early Access Agreement, if the Estate does not have sufficient funds to cover all administrative expenses or make an equal pro rata distribution

to all Class 2 claimants, the Participating Associations, upon appropriate written demand, will return to the Estate the portion of this first early access distribution that is needed to pay all administrative expenses and make an equal *pro rata* distribution to all Class 2 claimants.

A handwritten signature in black ink, appearing to read 'BK Stumpe', written over a horizontal line.

Honorable Brian K. Stumpe
Circuit Judge, Division 1