

Cause No. GV204523

THE STATE OF TEXAS

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IN THE DISTRICT COURT OF

v.

TRAVIS COUNTY, TEXAS

AMCARE HEALTH PLANS
OF TEXAS, INC. and
AMCARE MANAGEMENT, INC.

200th

JUDICIAL DISTRICT

MOTION FOR LEAVE TO FILE A PETITION
IN THE NATURE OF QUO WARRANTO

COMES NOW the State of Texas by and through its Attorney General, Gregg Abbott, at the request and instance of the Commissioner of Insurance of the State of Texas, and, pursuant to TEX. CIV. PRAC. & REM. CODE ANN. § 66.001 and TEX. INS. CODE ANN. art. 21.28-A § 5 and files this Motion For Leave To File A Petition In The Nature Of Quo Warranto against AmCare Health Plans Of Texas, Inc., and AmCare Management, Inc., of Houston, Texas, and in support thereof states:

I.

The proposed Plaintiff's Original Petition and Application for Temporary Injunction and Order Appointing Temporary Receiver sets forth probable grounds for proceeding against AmCare Health Plans Of Texas, Inc. and AmCare Management, Inc.

WHEREFORE, PREMISES CONSIDERED, the State of Texas prays that this Motion For Leave be granted and the Plaintiff's Original Petition and Application for Temporary Injunction and Order Appointing Temporary Receiver be ordered, filed and that process be ordered to issue thereon.

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Angela P. Klein

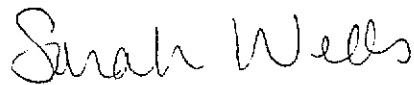
Respectfully submitted,

GREG ABBOTT
Attorney General of Texas

HOWARD G. BALDWIN, JR.
First Assistant Attorney General

JEFFREY S. BOYD
Deputy Attorney General for Litigation

DAVID C. MATTAX
Division Chief, Financial Litigation Division



Sarah C. Wells
Assistant Attorney General
State Bar No. 24028217
Financial Litigation Division
P.O. Box 12548
Austin, TX 78711-2548
Phone: 512-463-2018
Fax: 512-477-2348

ATTORNEYS FOR PLAINTIFF
STATE OF TEXAS