

Filed in The District Court
of Travis County, Texas

MAR 07 2007

At 1:46 P M.
Amalia Rodriguez-Mendoza, Clerk

CAUSE NO. D-1-GV-02-004523

THE STATE OF TEXAS,

Plaintiff,

v.

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

Defendants.

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IN THE DISTRICT COURT OF

TRAVIS COUNTY, TEXAS

200th JUDICIAL DISTRICT

**MOTION OF RESIDENT PRACTICING ATTORNEY IN SUPPORT OF
MOTION OF NON-RESIDENT ATTORNEY,
KENNETH RUSSAK, FOR ADMISSION *PRO HAC VICE***

TO THE HONORABLE DISTRICT COURT JUDGE:

Pursuant to TEX. R. GOVERN. BAR ADM'N. XIX(b), Douglas D. Dodds ("Movant"), files this Motion of Resident Practicing Texas Attorney in Support of the Motion by Non-Resident Attorney Kenneth Russak for Admission *Pro Hac Vice*, and states as follows:

1. Movant is an active member in good standing of the Texas State Bar. Mr. Dodds' Texas State Bar number is 05932020. Movant is a resident attorney who practices at the law firm of McGinnis, Lochridge & Kilgore, L.L.P., 600 Congress Avenue, Suite 2100, Austin, Texas 78701.

2. Kenneth Russak ("Applicant") has sought permission to appear *Pro Hac Vice* as counsel for MedImpact Healthcare Systems, Inc., in the above-titled and numbered cause of action. Applicant will be associated with Movant in this proceeding.

3. Movant finds Applicant, who is an active member in good standing of the State of California (107283), the United States District Courts for the Central, Eastern, Northern and Southern Districts of California, the United States Court of Appeals for the Ninth Circuit, the State of New York (2283760), and the United States Supreme Court, to be a reputable attorney,



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and recommends that Applicant be granted permission to participate in the above-entitled and numbered proceedings before the Court.


4. Mr. Dodds has contacted Harold B. Gold, counsel for the Receiver of AmCare Health Plans of Texas and AmCare Management, Inc., who advised that the Receiver does not oppose Applicant's motion for admission *Pro Hac Vice*.

WHEREFORE, Movant respectfully requests that the Court grant Applicant's motion and enter an order to participate as one of the attorneys for MedImpact Healthcare Systems, Inc., in the above-titled and numbered cause of action.

Respectfully submitted,

MCGINNIS, LOCHRIDGE & KILGORE, L.L.P.
600 Congress Avenue, Suite 2100
Austin, Texas 78701
Tel: (512) 495-6000
Fax: (512) 495-6093

By: _____


DOUGLAS D. DODDS
State Bar No. 05932020

**ATTORNEYS FOR MEDIMPACT
HEALTHCARE SYSTEMS, INC.**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing Motion was served on the persons listed below by certified mail return receipt requested and by the other means indicated on this the 7th day of March, 2007.

Mr. Harold B. Gold
Wisener, Nunnally, Gold, L.L.P.
625 West Centerville Road, Suite 110
Garland, TX 75041

Also Sent Via Email

Mr. Brian E. Riewe
Mr. Gregory C. Douglass
Brian E. Riewe, P.C.
4408 Spicewood Springs Road, Suite 101
Austin, TX 78759

Also Sent Via Email

Tom Collins
c/o Mrs. Jean Sustaita
Docket Clerk for Special Master
Texas Department of Insurance
333 Guadalupe, Tower III, 5th Floor
MC-305-1D
Austin, TX 78701

Mr. Tom Collins
Special Master
1301 W. 25th St., Suite 530
Austin, TX 78701

Mr. James Kennedy
Ms. Leanne Foster
Texas Department of Insurance
333 Guadalupe, Tower I, 8th Floor
MC-110-1A
Austin, TX 78701

3/7/2007

Ms. Joan Lackhorn
Texas Department of Insurance
333 Guadalupe, Tower III, 5th Floor
MC-305-1C
Austin, TX 78701

A handwritten signature in black ink, appearing to read 'D. Dodds', is written above a horizontal line.

Douglas D. Dodds