

FILED

OCT 05 2026

BEFORE THE INSURANCE COMMISSIONER OF THE
STATE OF OKLAHOMA

**INSURANCE COMMISSIONER
OKLAHOMA**

IN RE: HEARING PURSUANT TO 36 O.S.)
§ 984 AS TO WHETHER THE OKLAHOMA) **CASE NO. 26-0820-TRN**
HOMEOWNERS INSURANCE MARKET)
IS NONCOMPETITIVE)

**JOINT REQUEST OF THE OKLAHOMA ATTORNEY GENERAL AND BOB
SULLIVAN FOR PRODUCTION OF THE RECORD OF THE SEPTEMBER 4, 2026
PRE-HEARING CONFERENCE AND OF THE DESIGNATION UNDER 75 O.S. § 316**

COME NOW the State of Oklahoma, ex rel. Gentner Drummond, Attorney General of the State of Oklahoma (the "Attorney General"), a party to this proceeding pursuant to 74 O.S. § 18b(A)(22) and the Notice of Hearing filed herein on July 14, 2026, and Bob Sullivan, an interested party of record who entered his appearance on August 26, 2026 (together, "Movants"), and request that the Oklahoma Insurance Department (the "Department") produce the materials described below, as the Order Denying the Joint Affidavit Seeking Disqualification of the Independent Hearing Examiner and the Insurance Commissioner entered October 2, 2026 (the "Order") directs. In support, Movants state:

1. **The Order directs production.** The Order grants Movants' request that the record of the September 4, 2026 pre-hearing conference, "including the fact and duration of the recess," be preserved and made available to the parties, and "orders that the transcript and any video or audio recording of the hearing be preserved by the Department and made available to the parties." Order at 12.

2. **A recording exists.** The Department's legal assistant attests that she "recorded the audio from the September 4th PHC for the administrative record." Department's Response filed September 22, 2026, Ex. D ¶ 5.

3. **Materials requested.** Movants request that the Department deliver to all parties of record, within three business days of service of this request: (a) a complete and unedited copy of every audio and video recording of the September 4, 2026 pre-hearing conference, in its native format with its file information intact, including any portion recorded during the recess; (b) a statement by the person who made each recording whether the recording continued during the recess and, if it did not, the times at which it stopped and resumed; and (c) any transcript, log, or notes of the conference prepared from a recording.

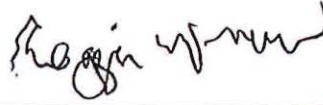
4. **The designation should be of record.** The Order recites that the Commissioner designated Mr. Mathis to determine the Affidavit. Order at 1, 6. No designation has been filed or served. Movants request that the instrument of designation be filed of record, or, if the designation was not made in writing, that the Department file a statement of the date on which it was made and by whom.

5. **Preparation of the Order.** Title 75 O.S. § 313 forbids one assigned to render a decision in an individual proceeding to communicate, in connection with any issue of law, with any party or its representative, except upon notice and opportunity for all parties to participate. The Order recognizes that the remedy for an ex parte communication is disclosure, so that all parties may respond. Order at 8 n.1. No proposed order was served on Movants. Movants request that the Department and Mr. Mathis each file of record a statement identifying (a) every communication between Mr. Mathis and the Department, its counsel, or its staff concerning the Affidavit, the responses to it, or the Order, other than filings served on all parties; (b) any proposed order, draft, or outline of the Order provided to Mr. Mathis by the Department or its counsel; and (c) each person other than Mr. Mathis who participated in preparing the Order, and that person's employer.

6. **No waiver.** Movants make this request without waiving any objection to the Order and reserve their right to seek its review.

WHEREFORE, PREMISES CONSIDERED, Movants respectfully request that the Department (1) deliver the materials described in paragraph 3 to all parties of record within three business days of service of this request; (2) file of record the instrument designating Mr. Mathis to determine the Affidavit, or a statement of the date and author of the designation; and (3) the Department and Mr. Mathis each file the statement described in paragraph 5; and that Movants be granted such other and further relief as is fair and proper.

Respectfully submitted,



Reggie N. Whitten, OBA No. 9576
Michael Burrage, OBA No. 1350
Blake Sonne, OBA No. 20341
Hannah Whitten, OBA No. 35261
Jake Denne, OBA No. 35097
WHITTEN BURRAGE
512 North Broadway Avenue, Suite 300
Oklahoma City, OK 73102
Office: 405.516.7800
Facsimile: 405.516.7859
rwhitten@whittenburragelaw.com
mburrage@whittenburragelaw.com
bsonne@whittenburragelaw.com
hwhitten@whittenburragelaw.com
jdenne@whittenburragelaw.com
*Attorneys for the State of Oklahoma, ex rel.
Gentner Drummond, Attorney General*



Michael J. Hunter, OBA No. 4503
Michael J. Hunter, PLLC
100 N. Broadway
Suite 3020
Oklahoma City, OK 73102
Telephone: (405) 985-3828
mike@mjlhlaw.net
Attorney for Bob Sullivan

CERTIFICATE OF SERVICE

I, Michael J. Hunter, hereby certify that on this 5th day of October, 2026, a true and correct copy of the above and foregoing **JOINT REQUEST OF THE OKLAHOMA ATTORNEY GENERAL AND BOB SULLIVAN FOR PRODUCTION OF THE RECORD OF THE SEPTEMBER 4, 2026 PRE-HEARING CONFERENCE AND OF THE DESIGNATION UNDER 75 O.S. § 316**

was filed with the Oklahoma Insurance Department by electronic mail to OIDlegal@oid.ok.gov, and was served by electronic mail upon:

Nicole M. Nash Antuanya "Bo" DeBose
Oklahoma Insurance Department
Legal Division OIDlegal@oid.ok.gov
Nicole.nash@oid.ok.gov
Bo.debose@oid.ok.gov

The Honorable John D. Miller
Independent Hearing Examiner
Oklahoma Insurance Department [via
OIDlegal@oid.ok.gov]

The Honorable Stephan S. Mathis
Independent Hearing Examiner
Designated Pursuant to 75 O.S. § 316
Oklahoma Insurance Department [via
OIDlegal@oid.ok.gov]

Craig MacIntyre
Oklahoma Insurance Commissioner Candidate
Craigforcommish26@gmail.com

Dr. Robert Hartwig
American Property Casualty Insurance
Association National Association of Mutual
Insurance Companies Walter.gonzales@apci.org

Brett Robinson
Oklahoma P&C Advocacy Association 608
E. Eubanks St
Oklahoma City, OK 73105
Telephone: (405) 965-9131
Email: brobinson@hbstrategies.us

J. Blake Patton, OBA No. 30673
Caleb E. Evans, OBA No. 36108
GABLEGOTWALS
BOK Park Plaza
499 W. Sheridan Ave, Suite 2200
Oklahoma City, OK 73102
Telephone: (405) 235-5500
Email: bpattton@gablelaw.com
cevans@gablelaw.com

Trent Shores, OBA No.19705
Jason Seay, OBA No. 22007
GABLEGOTWALS
110 N. Elgin Ave., Suite 200
Tulsa, OK 74120
Telephone: (918) 595-4800
Email: tshores@gablelaw.com
jseay@gablelaw.com


Michael J. Hunter