IN THE SUPREME COURT OF THE STATE OF OKLAHOMA

STATE OF OKLAHOMA, ex rel. GENTNER DRUMMOND, ATTORNEY GENERAL OF THE STATE OF OKLAHOMA, and BOB SULLIVAN, Petitioners, v. THE HONORABLE JOHN D. MILLER, Independent Hearing Examiner; GLEN MULREADY, Insurance Commissioner of the State of Oklahoma; and the OKLAHOMA INSURANCE DEPARTMENT, Respondents.	)	No. #124489 (OID Case No. 26-0820-TRN)

FILED
SUPREME COURT
STATE OF OKLAHOMA
OCT 15 2026
SELDEN JONES
CLERK

APPLICATION TO ASSUME ORIGINAL JURISDICTION AND PETITION FOR WRITS OF PROHIBITION AND MANDAMUS

COME NOW the State of Oklahoma, *ex rel.* Gentner Drummond, Attorney General of the State of Oklahoma, and Bob Sullivan (together, "Petitioners"), and respectfully apply to this Court to assume original jurisdiction and to issue writs of prohibition and mandamus directed to the Honorable John D. Miller, Independent Hearing Examiner; to Glen Mulready, Insurance Commissioner of the State of Oklahoma; and to the Oklahoma Insurance Department, in Oklahoma Insurance Department Case No. 26-0820-TRN. Petitioners reserved this remedy at paragraph 51 of the Joint Affidavit of Disqualification filed below on September 10, 2026, App. at 11. The Affidavit was denied by order entered October 2, 2026. App. at 18–29. A Brief in Support and Entries of Appearance are filed herewith, and an Appendix conforming to Rule 1.191(d).

RECEIVED
OKLAHOMA INSURANCE DEPARTMENT
OCT 19 2026

I. THE RELIEF SOUGHT

1. Petitioners seek, in the order in which this Court is most likely to reach it: (a) a writ of mandamus commanding the Hearing Examiner to certify his withdrawal and the Commissioner to withdraw from this proceeding, after which 75 O.S. § 316 supplies a successor examiner and a member pro tempore, or in the alternative vacating the October 2, 2026 order for a new determination by the officer § 316 names; and (b) a writ of prohibition restraining Respondents from proceeding until the Affidavit has been determined in the manner 75 O.S. § 316 requires.

2. Petitioners ask this Court to disqualify the Hearing Examiner and the Commissioner from this proceeding by commanding each to withdraw, as § 316 requires. Section 316 then supplies their replacements. See ¶ 35 below.

II. WHY THIS ACTION IS BROUGHT IN THIS COURT

3. This Court's original jurisdiction "shall extend to a general superintending control over all inferior courts and all Agencies, Commissions and Boards created by law," and this Court may "issue, hear and determine writs of habeas corpus, mandamus, quo warranto, certiorari, prohibition and such other remedial writs as may be provided by law." Okla. Const. art. VII, § 4. The Oklahoma Insurance Department is an agency created by law, and the Hearing Examiner sits as "a quasi-judicial officer." 36 O.S. § 319.

4. Mandamus may also issue from a district court. 12 O.S. § 1451. But this Court exercises original jurisdiction where a controversy affects the public interest and presents a pressing need for an early decision. *Tobacco Settlement Endowment Trust Fund v. Stitt*, 2026 OK 1, ¶¶ 10–12, 583 P.3d 280, 286–87. Both conditions are met. The proceeding below will determine whether the homeowners insurance market of the entire State is noncompetitive, a matter in which

"the public, the community at large, has some pecuniary interest." *State v. Lyon*, 1917 OK 229, ¶ 1, 165 P. 419, 420. It reaches insurance consumers in every county, whose collective interests the Attorney General represents below. 74 O.S. § 18b(A)(22); *Hunsucker v. Fallin*, 2017 OK 100, ¶ 6, 408 P.3d 599, 602–03. And the facts material to the § 316 question are of record. This Court has assumed original jurisdiction over an ongoing administrative adjudication, before any final order, on an application directed at a hearing officer's impartiality. *Arbuckle Simpson Aquifer Protection Federation of Oklahoma, Inc. v. Oklahoma Water Resources Board*, 2013 OK 29, ¶¶ 14, 17, 343 P.3d 1266, 1271–72, 1272. Nor is 36 O.S. § 984(B)(3) an adequate remedy. It permits a district court challenge to "[t]he ruling" on competition; it provides no means of challenging who sits before that ruling is made.

5. No other remedy is adequate. Judicial review under the Administrative Procedures Act reaches only a final agency order, 75 O.S. §§ 318, 322, and is confined to the record, 75 O.S. § 321. The order the Hearing Examiner signs is itself final agency action, 36 O.S. § 313(A), subject to no intra-agency review. Petitioners do not contend that review of a final order is inadequate whenever an agency adjudicator's impartiality is questioned. Ordinarily that review is adequate, and a party who objects only to the structure the Legislature prescribed must await it. This Application is different in kind. Petitioners do not challenge § 316. They ask that it be enforced. Section 316 commits the determination to the administrative head of the agency and authorizes no one else to make it. A head who cannot make it must withdraw, and the statute then supplies his or her replacement. The Commissioner did neither. He kept the office and named another officer to decide "in his stead," App. at 23, and the proceeding has been ordered to resume on the strength of that officer's order. Review of a final order cannot supply the determination that § 316 required before the hearing.

6. **This is a question of first impression.** This Court assumes original jurisdiction "to clarify a new statute or a new legal procedure, to decide a matter of first impression, [and to] examine whether the controverted issue is likely to be repeated with an adjudication to preserve judicial economy." *Independent School District No. 12 of Oklahoma County v. State ex rel. State Board of Education*, 2024 OK 39, ¶ 22, 565 P.3d 23, 31. Since 1998, § 316 has directed that a disqualification affidavit be "determined promptly by the administrative head of the agency." Laws 1998, c. 62, § 2. Petitioners do not ask this Court to revisit that direction. No reported decision addresses who may determine an affidavit when the head of a single-officer agency is himself its subject, or whether he may select the officer who determines it. Two pending original actions also concern § 316: *Authenticity Grow, Inc. v. Shifflett*, No. 124,266, and *Jett Cultivation, Inc. v. Shifflett*, No. 124,331. The Attorney General's office appears in both for the Oklahoma State Bureau of Narcotics and Dangerous Drugs Control. Those petitioners contend that § 316 is unconstitutional as applied when the agency head decides the motion. Petitioners here make no such contention. They ask that § 316 be enforced as written against an agency head who did not decide the motion and did not withdraw.

III. TIMELINESS UNDER RULE 1.191(i)

7. **No cause is set for hearing.** Rule 1.191(i) requires filing "at least ten (10) days prior to the date said cause is set for hearing or trial." On September 15, 2026 the Hearing Examiner stayed the proceeding and struck every setting, including the merits hearing set for October 26, 2026. Transcript of September 15, 2026 Hearing, App. at 191–93 (Tr. 17:22–19:1). The order of October 2, 2026 directs that the proceeding resume, App. at 29, but no hearing has been reset. The ten-day limitation is not engaged.

8. **The disqualification arose on September 4.** The April 7, 2026 order, the Department's statements, and the Commissioner's participation in the 2026 election were public when made. What was not known before September 4, 2026 is that the Department would call the Commissioner as its witness on the question he had already answered. Affidavit of Whitten and Hunter, App. at 2 (Aff. ¶ 7).

9. **What precipitated this Application.** By order entered October 2, 2026, an independent hearing examiner designated by the Commissioner denied the Affidavit as to the Hearing Examiner and denied as moot the request that the Commissioner withdraw. App. at 18–29. Section 316 commits the question to the agency in the first instance, and it was raised there. *Leo v. Oklahoma Water Resources Board*, 2023 OK 96, ¶ 49, 536 P.3d 939, 954.

10. **The Application is not premature.** Prohibition "is a preventive, rather than a corrective, remedy." *Draper v. State*, 1980 OK 117, ¶ 14, 621 P.2d 1142, 1147. The order of October 2, 2026 directs that "the proceeding shall resume under the Hearing Examiner without further delay." App. at 29. And "[t]he time to address allegations of bias, or the appearance of bias, on the part of the hearing officer is now." *Arbuckle Simpson*, 2013 OK 29, ¶ 17, 343 P.3d at 1272.

11. No setting below requires this Court to act within thirty days, and this Application is not designated EMERGENCY. Rule 1.191(i).

IV. PARTIES

12. Petitioner the State of Oklahoma, *ex rel.* Gentner Drummond, is a party to Case No. 26-0820-TRN pursuant to 74 O.S. § 18b(A)(22) and the Notice of Hearing filed July 14, 2026. Petitioner Bob Sullivan is an interested party of record who entered his appearance on August 26, 2026. Entry of Appearance, App. at 124.

13. Respondent the Honorable John D. Miller is the independent hearing examiner appointed under 36 O.S. § 319. Respondent Glen Mulready is the Insurance Commissioner, the administrative head of the agency, and the officer in whose name the Department moved to dismiss Mr. Sullivan and opposed the Affidavit, App. at 127, 196-208. Respondent Oklahoma Insurance Department is the agency to which § 316 commits the assignment of a successor examiner and is a party below.

14. The National Association of Mutual Insurance Companies, the American Property and Casualty Insurance Association, the Oklahoma P&C Advocacy Association, and Craig MacIntyre, the remaining participants of record, are parties and are served herewith. Rule 1.191(e).

V. THE FACTS ENTITLING PETITIONERS TO RELIEF

15. **The proceeding.** On July 14, 2026 the Commissioner issued a Notice of Hearing under 36 O.S. §§ 307 and 984 and OAC 365:1-7-1(a), setting for hearing the question "whether the homeowners insurance market in Oklahoma is noncompetitive," and inviting "all interested parties with a direct, immediate, and substantial interest" to participate. Notice of Hearing, App. at 71.

16. **Petitioners have consistently opposed delay.** The Attorney General's Omnibus Pre-Hearing Motion was fully briefed by noon on September 3, 2026. App. at 90. At approximately 5:00 p.m. that day the Department, through counsel filing in the name of "the State of Oklahoma, ex rel. Glen Mulready, Insurance Commissioner," moved to dismiss two participants, both announced candidates for Insurance Commissioner, stating that it "does not wish for the scheduled pre-hearing conference to be delayed or continued further." Motion to Dismiss, App. at 127, 132.

17. **The Hearing Examiner appeared from the Department's building.** At the September 4, 2026 conference, conducted by Microsoft Teams, the Hearing Examiner appeared from the Department's building, assisted by the Department's legal assistant, Sherry Standerfer, who supplied names during the roll. The transcript enters him of record in care of Ms. Standerfer at the Department's Legal Division. Transcript of September 4, 2026 Conference, App. at 35, 37 (Tr. 2, 4); App. at 40–42 (Tr. 7:10–11, 8:11–19, 9:6–9). The Department is a party.

18. **The Hearing Examiner stated he did not want to move the hearing date.** Before any motion to continue had been made, he stated on the record that he was "not particularly wanting to move the date or time of the actual hearing itself, but I want to make sure it's conducted in a fair and impartial way." Transcript, App. at 48 (Tr. 14:3–8).

19. **The continuance was moved from the floor, and the Department did not object.** Brett Robinson, for the Oklahoma P&C Advocacy Association, the one participant the Hearing Examiner noted as "present here," App. at 41 (Tr. 8:13–14), moved orally for a continuance; no written motion or notice had been given. Transcript, App. at 47 (Tr. 14:9–20). The Department, which the evening before had stated in writing that it did not wish the pre-hearing conference "delayed or continued further," App. at 132, stated that it "has no objection to any motions for a continuance." Transcript, App. at 47–48 (Tr. 14:21–15:4).

20. **Three participants objected; Petitioners among them.** The Attorney General, Mr. Sullivan, and NAMIC and APCIA each objected. Transcript, App. at 48–50 (Tr. 15:7–20, 16:18–24, 17:5–8). The Order for Continuance records the same alignment. App. at 29.

21. **The movant.** Mr. Robinson, the sole participant to seek the continuance, is a listed co-host of a July 23, 2026 fundraising reception benefiting Marty Quinn, then a candidate for

Insurance Commissioner, which the Commissioner also co-hosted. Invitation, App. at 87. Mr. Quinn's opponent was Mr. Sullivan, a party here and one of the two participants the Department had moved the previous evening to remove. Inexplicably, Mr. Robinson, who moved for the continuance, filed no responsive pleading during the continuance he requested. See App. at 18–19.

22. **The recess.** The Hearing Examiner announced, "we're going to be in recess for about five minutes here, and then I'll come back and issue a decision." The recess ran thirteen minutes, from 9:21 to 9:34 a.m. Transcript, App. at 52 (Tr. 19:7–10). No participant appearing remotely could see or hear anything that occurred during it, and nothing in the record answers whether anything was said to him concerning the continuance.

23. **The ruling.** Upon returning he granted the continuance, over the objection of three of the four participants who addressed the question, and in favor of the one who requested it. Transcript, App. at 52 (Tr. 19:25).

24. **The Commissioner is an anticipated witness.** In the scheduling discussion that followed, counsel for the Department stated, in answer to the Hearing Examiner's question, that "we are anticipating that he may be a witness." The Hearing Examiner responded: "Well, that — that's important." Transcript, App. at 57–58 (Tr. 24:18–25:5). That disclosure was made for the first time on September 4, 2026.

25. **The Commissioner has already answered the question, without a hearing.** By written order of April 7, 2026 in Case No. 26-0215-COR, entered without a hearing and without receiving evidence subject to notice and cross-examination, the Commissioner concluded that "the evidence supports a finding that the Oklahoma homeowners insurance market is competitive" and

that the requesting party had not overcome the presumption. Order of April 7, 2026, App. at 69–70. He repeated that conclusion in Department releases of January 7 and May 20, 2026, the second of which announced this hearing. Affidavit of Whitten and Hunter, App. at 1–17.

26. **The Commissioner campaigned against a party.** Ten weeks after that order, on the day of the June 16, 2026 primary, the Commissioner urged voters publicly to support Mr. Quinn; nine days after issuing the Notice of Hearing he co-hosted the Quinn fundraiser. Facebook post and Invitation, App. at 87–90. Mr. Sullivan defeated Mr. Quinn on August 25, 2026, and nine days later the Department moved to remove him from this proceeding.

27. **The Affidavit.** On September 10, 2026 Petitioners filed the Joint Affidavit under 75 O.S. § 316, stating the grounds with particularity. Affidavit of Whitten and Hunter, App. at 11 (Aff. ¶ 52(a)–(j)).

28. **The Hearing Examiner referred the Affidavit and stayed the proceeding.** On September 14, 2026 the Hearing Examiner struck the next day's pre-trial conference and set the Affidavit alone in its place. Administrative Order, App. at 174. On September 15 he stayed the matter and referred the Affidavit to the Commissioner: "I will not be making any decisions based on 75 O.S. 316. It will go back to Mr. Mulready for a determination." Transcript of September 15, 2026 Hearing, App. at 192 (Tr. 18:6–8). Every setting was stricken. App. at 192–93 (Tr. 18:20–19:1). On September 28, 2026 he memorialized the stay by written order, directing to the Commissioner "the issue of disqualification of the hearing examiner." App. at 214–15.

29. **The Department described two courses.** Counsel for the Department said the Commissioner could decide the Affidavit or "could appoint another hearing examiner to decide the matter of disqualification," and represented that the Commissioner "will not be making the

determination himself." App. at 185, 190 (Tr. 11:3–11, 16:18–19). Counsel for the Attorney General responded that the Commissioner, if disqualified, could not select the officer who decides. App. at 191 (Tr. 17:7–16).

30. **The Commissioner's Response.** On September 22, 2026 the Department filed a Response in the name of "the State of Oklahoma, *ex rel.* Glen Mulready, Insurance Commissioner," asking that the Affidavit "be denied in its entirety and that this matter proceed on the merits before Independent Hearing Examiner John Miller." App. at 196, 207.

31. **The Joint Objection.** Petitioners objected to the Response as a submission on the merits by "[t]he officer to whom § 316 commits the determination," and asked that he rule by written order by October 2, 2026, that the recording be produced, and that the determination address both officers. Joint Objection, App. at 217–19.

32. **The designation and the order.** The Commissioner apparently designated Stephan S. Mathis to determine the Affidavit. App. at 18, 23. No notice of the designation was given, and no instrument of designation appears of record. His order of October 2, 2026 disposed of the compensation ground on the basis that the Hearing Examiner's arrangement "is not alleged to be materially different than any other hearing examiner utilized by the Department," App. at 27; denied the request as to the Commissioner as moot because he "does not preside, and cannot review, the Hearing Examiner's final order," App. at 28; and directed that "the proceeding shall resume under the Hearing Examiner without further delay," App. at 29.

VI. GROUNDS FOR THE WRITS

The grounds are stated here; the supporting argument and authorities appear in the Brief in Support filed herewith. Okla. Sup. Ct. R. 1.191(c), 1.11(k)(2).

33. **The Commissioner should stand aside.** Agency adjudicators are presumed capable of judging a controversy fairly, and an agency may combine investigative and adjudicative functions. *Wilson v. Oklahoma Horse Racing Commission*, 1996 OK 3, ¶ 13, 910 P.2d 1020, 1023; *Tweedy v. Oklahoma Bar Association*, 1981 OK 12, ¶ 5, 624 P.2d 1049, 1052–53. Petitioners do not ask this Court to disturb either rule. The presumption yields to specific facts, and they are present here. The Commissioner decided the question before the hearing and said he stood by that answer, App. at 69–70, 85–86; through counsel filing in his name, moved to dismiss Mr. Sullivan and Mr. MacIntyre, both candidates for his office, App. at 127; is the Department's anticipated witness, App. at 57–58; opposed the Affidavit in his name, App. at 196, 207; and chose the officer who decided it, App. at 18, 23. He also campaigned publicly against Mr. Sullivan. App. at 87–89. Petitioners do not contend that an agency may not engage hearing examiners, or that an examiner it pays is for that reason partial. 36 O.S. §§ 307, 319. The difficulty is the combination: the official who engaged this examiner has announced the answer, litigates against a party in his own name, and is expected to testify before the examiner his Department pays. The order under review weighed the contract and the Commissioner's conduct separately and never together, App. at 27–28, and set the Commissioner aside as moot, App. at 28, though he had just exercised a supervisory role by choosing the officer who decided the Affidavit, App. at 23. When Commissioner Grimes concluded that a hearing by "himself or any member of his staff might give the appearance that the hearing examiner was not impartial," he disqualified "himself and his staff." *Roussel v. State ex rel. Grimes, 1980 OK 101, ¶ 4, 614 P.2d 53, 55. And this Court has affirmed an order disqualifying every member of an agency board from a disciplinary proceeding. Johnson v. Board of Governors of Registered Dentists, 1996 OK 41, ¶¶ 11, 39, 913 P.2d* 1339, 1344, *1349.* The same course is required here.

34. **Mandamus directed to the determination of the Affidavit.** Section 316 commands that a hearing examiner or agency member "shall withdraw" from any proceeding in which he cannot accord a fair and impartial hearing. Providing a fair and impartial hearing is "not something subject to discretion," and an officer unable to provide one is "required to withdraw." *Arbuckle Simpson*, 2013 OK 29, ¶ 15, 343 P.3d at 1272; 12 O.S. §§ 1451, 1455. A ruling on disqualification is reviewed for clear abuse of discretion, and mandamus issues where that standard is met. *Merritt v. Hunter*, 1978 OK 18, ¶¶ 2, 6, 575 P.2d 623, 624. Petitioners do not contend that the Commissioner lacked power to act on the Affidavit in the first instance. The order of October 2, 2026 is a clear abuse of discretion for two reasons. It was entered by an officer whom the Commissioner, a subject of the Affidavit, selected without notice and over Petitioners' objection. App. at 191 (Tr. 17:7–16). Section 316 commits the determination to "the administrative head of the agency" and authorizes no one else to make it. The order itself records why he did not make it: "the Affidavit names the Commissioner and the Department anticipates calling him as a witness." App. at 23. An officer in that position must withdraw, and § 316 then supplies his or her replacement. And the order tested each circumstance for lawfulness and concluded that "[a]n aggregation of individually lawful and unremarkable circumstances does not become an appearance of partiality merely by being listed together," App. at 28, when the appearance of partiality is judged on "the totality of the circumstances." *Bowen v. State ex rel. Oklahoma Real Estate Appraiser Board*, 2011 OK 86, ¶ 23, 270 P.3d 133, 139.

35. **The member pro tempore.** The Insurance Commissioner is the agency's only member. When a member's disqualification leaves no quorum, "the Governor immediately shall appoint a member pro tempore to sit in place of the disqualified member in that proceeding." 75 O.S. § 316. In *Roussel* the officer so appointed "became an Insurance Commissioner pro tem."

1980 OK 101, ¶ 20, 614 P.2d at 57. The member pro tempore, not the Department, would then assign the examiner.

36. **Prohibition.** Prohibition issues where an officer "has or is about to exercise judicial or quasi-judicial power," the exercise is "unauthorized by law," and it "will result in injury for which there is no other adequate remedy." *Baby F. v. Oklahoma County District Court*, 2015 OK 24, ¶ 8, 348 P.3d 1080, 1084. The threatened act is the resumption of this proceeding, which the order under review directs "without further delay," App. at 29, before a tribunal whose composition has not been lawfully determined. Review of the final order cannot supply the determination § 316 required before the hearing. See ¶ 5 above.

VII. PRAYER

WHEREFORE, Petitioners respectfully pray that this Court assume original jurisdiction and:

1. issue a writ of mandamus commanding the Hearing Examiner to certify his withdrawal and the Commissioner to withdraw from Case No. 26-0820-TRN; or, in the alternative, commanding that the order of October 2, 2026 be vacated and the Affidavit determined anew, by the officer § 316 names, with the matter to proceed before an impartial hearing examiner, see *Wilson v. Oklahoma Horse Racing Commission*, 1996 OK 3, ¶ 17, 910 P.2d 1020, 1024;

2. issue a writ of prohibition restraining Respondents from conducting the merits hearing or entering further substantive rulings in Case No. 26-0820-TRN until the Affidavit is determined in the manner 75 O.S. § 316 requires;

3. declare that, upon the Commissioner's withdrawal, 75 O.S. § 316 calls for a member pro tempore to sit in his place;

4. upon the Hearing Examiner's disqualification, command that his successor be assigned without the Commissioner's participation, by agreement of the parties if possible; and

5. grant such other relief as is just and proper.

Respectfully submitted,

Reggie N. Whitten, OBA No. 9576
Michael Burrage, OBA No. 1350
Hannah Whitten, OBA No. 35261
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
hwhitten@whittenburragelaw.com

Michael J. Hunter, OBA No. 4503
Michael J. Hunter, PLLC
100 N. Broadway, Suite 3020
Oklahoma City, OK 73102
Telephone: (405) 985-3828
Email: Mike@mjhlaw.net

Attorney for Bob Sullivan

AND

Gentner Drummond, OBA No. 16645
Attorney General of Oklahoma
Garry M. Gaskins II, OBA No. 20212
Solicitor General
Cameron R. Capps, OBA No. 32742
Deputy Attorney General
Kristin Siegel, OBA No. 32871
Assistant Attorney General
313 NE 21st Street
Oklahoma City, Oklahoma 73105
Telephone: (405) 522-9052
Facsimile: (405) 521-3921

Email: Garry.Gaskins@oag.ok.gov
Cameron.Capps@oag.ok.gov
Kristin.Siegel@oag.ok.gov

Attorneys for the State of Oklahoma, ex rel. Gentner Drummond, Attorney General

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of October, 2026, a true and correct copy of the above and foregoing *Application to Assume Original Jurisdiction and Petition for Writs of Prohibition and Mandamus* was served, in the manner provided in 12 O.S. § 2005(B) and the Rules for Electronic Filing in the Oklahoma Courts, upon the following respondents, parties, and real parties in interest entitled to notice under Rule 1.191(e):

Nicole M. Nash, OBA No. 31412
Antuanya "Bo" DeBose, OBA No. 32765
Oklahoma Insurance Department
Legal Division
OIDlegal@oid.ok.gov
Nicole.nash@oid.ok.gov
Bo.debose@oid.ok.gov
Counsel for the Oklahoma Insurance Department

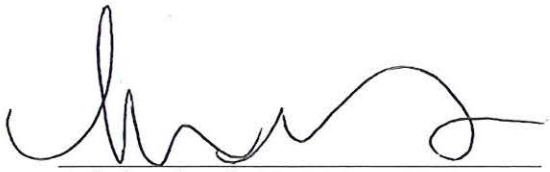
Gideon A. Lincecum
Mark D. Myers
Fareshteh Hamidi
Lynn Hernandez
STEPTOE & JOHNSON PLLC
Oklahoma Tower, 23rd Floor
210 Park Ave., Ste. 2300
Oklahoma City, Oklahoma 73102
Tele: (405) 930-5151
Fax: (405) 212-5843
gideon.lincecum@steptoe-johnson.com
mark.myers@steptoe-johnson.com
fareshteh.hamidi@steptoe-johnson.com
lynn.hernandez@steptoe-johnson.com
Special Counsel for State Of Oklahoma *Ex Rel.* Glen Mulready, Insurance Commissioner

The Honorable John D. Miller
Independent Hearing Examiner
Oklahoma Insurance Department
[via OIDlegal@oid.ok.gov]
Craig MacIntyre
Craigforcommish26@gmail.com

J. Blake Patton, OBA No. 30673
Caleb E. Evans, OBA No. 36108
GABLEGOTWALS
499 W. Sheridan Ave., Suite 2200
Oklahoma City, OK 73102
bpatton@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
tshores@gablelaw.com
jseay@gablelaw.com
Attorneys for NAMIC and APCIA

Brett Robinson
Oklahoma P&C Advocacy Association
608 E. Eubanks St.
Oklahoma City, OK 73105
brobinson@hbstrategies.us



Kristin Siegel, OBA No. 32871