FILED
SUPREME COURT
STATE OF OKLAHOMA

OCT 26 2026

SELDEN JONES
CLERK

**IN THE SUPREME COURT OF THE STATE OF OKLAHOMA**

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| STATE OF OKLAHOMA, ex rel. GENTNER DRUMMOND, ATTORNEY GENERAL OF THE STATE OF OKLAHOMA, and BOB SULLIVAN, | ) | No. PR-124,489 |
| Petitioners, | ) | (OID Case No. 26-0820-TRN) |
| v. | ) | |
| THE HONORABLE JOHN D. MILLER, Independent Hearing Examiner; GLEN MULREADY, Insurance Commissioner of the State of Oklahoma; and the OKLAHOMA INSURANCE DEPARTMENT, | ) | |
| Respondents. | ) | |

**JOINT APPLICATION TO AUTHORIZE ARGUMENT BY COUNSEL FOR EACH PETITIONER AT ORAL PRESENTATION**

Petitioners, the State of Oklahoma ex rel. Gentner Drummond, Attorney General of the State of Oklahoma (the "Attorney General"), and Bob Sullivan, apply under the Court's Order of October 19, 2026 for authorization of additional presentation at the November 19, 2026 oral presentation. In support, Petitioners state:

1. The Order of October 19, 2026 sets oral presentation to a Referee of this Court for November 19, 2026, at 10:30 a.m., and provides that "[o]nly one attorney may present argument for each side unless additional presentation is authorized by the Court on application." The two Petitioners are separately represented, here and below. The Attorney General appears through Whitten Burrage and the Office of the Attorney General. Mr. Sullivan appears through Michael J. Hunter. Petitioners ask that Michael Burrage present argument for the Attorney General and that Michael J. Hunter present argument for Mr. Sullivan. Mr. Burrage's Entry of Appearance is filed herewith.

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2. Petitioners are aligned on the relief sought, but they stand on different footing below. The Notice of Hearing invited the Attorney General by name, under his statutory authority. App. at 71. Mr. Sullivan participates in his own right. He requested a hearing under 36 O.S. § 984, which the Commissioner denied by order of April 7, 2026, App. at 69–70, and he is a licensed Oklahoma insurance producer. App. at 128, 158–59.

3. The Department has moved below to dismiss Mr. Sullivan for lack of standing. App. at 127–34. Mr. Sullivan opposed the motion, App. at 157–73, and no ruling on it appears of record. No motion below challenges the Attorney General's participation.

4. Petitioners do not ask this Court to address that motion, which is pending below. They ask only that each Petitioner be heard through its own counsel. If Respondents' response challenges Mr. Sullivan's standing to seek relief in this Court, only his counsel can answer for him, and the Attorney General cannot do so without speaking for a party he does not represent.

5. Petitioners ask that their counsel divide equally the time the Referee allots to Petitioners. In the alternative, Petitioners ask that the Referee allot Petitioners additional time, to be divided between their counsel as the Referee directs. Counsel will coordinate so that the two presentations do not repeat one another.

6. If the Court allows Petitioners additional time, Petitioners do not object to equal additional time for Respondents, or to Respondents' counsel dividing their time in the same manner. Nothing in this Application affects the opportunity of parties of record below to seek leave under the Order of October 19, 2026. Petitioners file this Application now so that the Court may rule on it before the November 13, 2026 deadline for the notice of arguing counsel.

WHEREFORE, Petitioners respectfully request that the Court authorize additional presentation at the November 19, 2026 oral presentation, so that Michael Burrage may present argument for the Attorney General and Michael J. Hunter may present argument for Mr. Sullivan, dividing equally the time the Referee allots to Petitioners or, in the alternative, such additional time as the Referee allows; and that Petitioners be granted such further relief as the Court considers just.

Respectfully submitted,

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## CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of October, 2026, a true and correct copy of the above and foregoing *Joint Application to Authorize Argument by Counsel for Each Petitioner at Oral Presentation* was served by U.S. Mail, first-class postage prepaid, to each mailing address listed below and by electronic mail to each email address listed below, upon the following respondents, parties, and real parties in interest entitled to notice under Rule 1.191(e):

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