

**STATE OF MICHIGAN  
IN THE CIRCUIT COURT FOR THE COUNTY OF INGHAM**

ANITA G. FOX, Director of the Michigan  
Department of Insurance and Financial  
Services,

Case No. 19-504-CR

Hon. Wanda M. Stokes

Petitioner,

v.

PAVONIA LIFE INSURANCE COMPANY  
OF MICHIGAN,

Respondent.

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**GBIG HOLDINGS, INC'S ("GBIG") EMERGENCY  
MOTION FOR RECONSIDERATION, TO REVISE THE COURT'S JULY 10, 2020  
ORDER TO REMOVE THE AUTHORITY OF REHABILITATOR, FINDINGS OF  
NONCOMPLIANCE WITH SPA, AND THREAT OF SANCTIONS OR, IN THE  
ALTERNATIVE, TO STAY THE EFFECT OF ITS ORDER**

GBIG Holdings, Inc., by and through its counsel, Clark Hill PLC and attorneys Peter B. Kupelian, Ronald A. King, and Zachary C. Larsen, hereby files this emergency motion for reconsideration, to revise the Court's July 10, 2020 Order to remove the authority of the Rehabilitator, findings of noncompliance with the SPA, and threat of sanctions, or in the alternative, to stay the effect of the Court's order, under MCR 2.119(F), MCR 2.612(C), MCR 2.604(A), and MCR 7.209(E) and relies on the attached brief in support of its motion.

**Because of the deadlines set by this Court's July 10, 2020 Order, GBIG respectfully requests that this Court rule on its motion by 12 p.m. on Monday, July 13.**

Respectfully Submitted,

CLARK HILL PLC

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Dated: July 12, 2020

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