IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

IN RE:	*	CASE NO. 13-52728-WLH
GETAUTOINSURANCE.COM AGENCY, LLC.,	* *	CHAPTER 11
Debtors.	* * *	
IN RE:	* *	CASE NO. 13-52729-WLH
MAP GENERAL AGENCY, INC.,	* *	CHAPTER 11
Debtors.	* *	
IN RE:	* * *	CASE NO. 13-52731-WLH
DESTINY GENERAL AGENCY, INC.,	* *	CHAPTER 11
Debtors.	* *	
IN RE:	* *	CASE NO. 13-52732-WLH
LINDSAY GENERAL	*	
INSURANCE AGENCY, INC.,	* *	CHAPTER 11
Debtors.	*	
	*	

SUPPLEMENT TO DEBTORS' RENEWED AND RESTATED JOINT DISCLOSURE STATEMENT

On February 14, 2017, the Court approved the Debtors' Renewed and Restated Joint Disclosure Statement and set a Confirmation Hearing on Debtors' Joint Plan for May 18, 2017.

An important element of the Debtors' Plan was the treatment of two large creditors, Class

4, Receiver of Driver's Insurance Group, and Class 5, Receiver of National Guaranty Insurance

Company. At the time of the initially scheduled confirmation hearing, all issues relating to the

Class 4 Creditor had been completely resolved. With respect to the Class 5 Creditor, the

Case 13-52728-wlh Doc 485 Filed 05/18/18 Entered 05/18/18 14:49:15 Desc Main Document Page 2 of 5

Receiver of National Guaranty Insurance Company ("NGIC"), an agreement respecting its claim and treatment had been reached in principle but it then appeared that the NGIC Receiver was in the process of assigning its rights and interests to the Nevada Insurance Guaranty Association ("Association") and, further, that the Receiver was engaged in court proceedings to close out the Receivership's estate.

The end result of the assignment process was the reopening of settlement negotiations following a lengthy, seemingly cumbersome process of assignment of claims from one entity to the other. Eventually, the Receivership claim was assigned and transferred to the Association. Then, in late April/early May of this year, 2018, the formal transfer of the Association's claim was settled and is reflected on Transfer of Claim and Transfer Agreement documents filed with the Bankruptcy Court [Doc. 481]. The Transfer of the Association claim reflected is to one Vikash Jain, an unrelated third-party purchaser of the claim^{*} The current status of the claim, accordingly, is that all issues are completely resolved and Debtors are ready to proceed to confirmation.

Over the months since the Disclosure Statement mentioned above was approved by the Court, rescheduling of confirmation hearings took place several times in order to accommodate the finishing of settlement and transfer of the Class 5 claim. Over that same period of approximately one year, the Debtors have engaged in no business activity and the status quo has been preserved. The ongoing effort in the case has been to consummate settlement and transfer of the Class 5 claim and to insure that funding of the Plan is in place. The terms of the Plan remain the same in all material respects. The only change is that the purchaser of the Class 5 claim changed from Mr. Preuez to Mr. Jain.

^{*} Steve Preuez was initially to be the purchaser of the claim but due to the delay on the prior assignment was dropped.

Case 13-52728-wlh Doc 485 Filed 05/18/18 Entered 05/18/18 14:49:15 Desc Main Document Page 3 of 5

This Supplement to the Debtors' Joint Disclosure Statement is intended to provide information in brief summary fashion to all creditors and parties in interest in this case.

In addition, the Court has deemed it appropriate to allow further voting by creditors given the one-year period between the first confirmation hearing scheduled and the present date. Attached hereto is a ballot prepared for use by any creditor in this case.

If you have already voted, you do not need to vote again.

If you have not voted previously, the Court has reopened voting and you may do so.

If you have voted already but wish to change your vote, you may do so subject to review by the Court.

You are not required to vote. But you should be aware that the Plan referred to in the Ballot can be confirmed by the Court and made binding on you if it is accepted by the holders of at least two-thirds in amount and more than one-half in number of all allowed claims in each case entitled to vote on the Plan.

In the event the requisite acceptances are not obtained, the Court may nevertheless confirm the Plan if the Court finds that the Plan accords fair and equitable treatment to the class or classes rejecting it and otherwise satisfies the requirement of §1129(b) of Title 11, United States Code. To have your vote on the Plan count, you must complete and return the ballot.

Dated this 18th day of May, 2018.

<u>/s/George M. Geeslin</u> George M. Geeslin Georgia Bar No. 288725

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	*	

CERTIFICATE OF SERVICE

I certify that I have this day served the person listed below with a copy of the within and foregoing **SUPPLEMENT TO DEBTORS' RENEWED AND RESTATED JOINT DISCLOSURE STATEMENT** by depositing a copy of same in the United States Mail, adequate postage affixed thereto to: Lindsay P.S. Kolba Office of the U.S. Trustee Suite 362 75 Ted Turner Drive, S.W. Atlanta, GA 30303-3330

This 18th day of May, 2018.

<u>/s/George M. Geeslin</u> George M. Geeslin

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