

**BEFORE THE ADMINISTRATIVE HEARING COMMISSION
STATE OF MISSOURI**

**Director of the Department of Insurance,)
Financial Institutions & Professional)
Registration)
State of Missouri,)**

Petitioner,)

vs.)

SENIOR TITLE AGENCY, LLC,)

And,)

**ALL AMERICAN TITLE AGENCY,)
LLC,)**

Respondents.)

FILED

NOV 19 2009

ADMINISTRATIVE HEARING
COMMISSION

Case No.: 08-2128 DI

MOTION FOR ORDER OF ABEYANCE

The Director of the Missouri Department of Insurance, Financial Institutions and Professional Registration, through counsel, requests the Commission issue an order continuing the hearing currently scheduled for November 23, 2009, and holding this matter in abeyance until Respondents' bankruptcy is resolved. In support of his MOTION, the Director states as follows:

1. On December 23, 2008, the Director filed a Complaint against Respondents.
2. On August 12, 2009, Respondent All American Title Agency, LLC, filed a Chapter 11 Bankruptcy petition in the United States Bankruptcy Court in the Northern District of Illinois (Chicago), Bankruptcy Petition # 09-29704.
3. Such Petition automatically stays all proceedings impacting Respondent All American Title Agency, LLC's finances.

4. Upon information and belief, Respondent Senior Title Agency, LLC, also filed a Bankruptcy petition, automatically staying all proceedings impacting Respondent Senior Title Agency, LLC's finances.
5. Counsel for the Director and bankruptcy counsel for Respondents are negotiating a settlement that may eliminate the need for an evidentiary hearing.
6. This Motion is made in the interest of justice and not with the intent to unreasonably delay or hinder these proceedings in any manner.

Respectfully submitted,



Tamara W. Kopp
Missouri Bar # 59020
Senior Enforcement Counsel
Missouri Department of Insurance, Financial
Institutions & Professional Registration
301 West High Street, Room 530
Jefferson City, Missouri 65101
Telephone: (573) 751-2619
Facsimile: (573) 526-5492

ATTORNEY FOR PETITIONER
Director
Missouri Department of Insurance, Financial
Institutions & Professional Registration

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of Petitioner's Motion for Continuance on Respondents, and that such was mailed, postage prepaid this 19th day of November, 2009 to:

SENIOR TITLE AGENCY, LLC
601 North Hicks Road, Suite B
Palatine, Illinois 60067

ALL AMERICAN TITLE AGENCY, LLC
National Registered Agents, Inc.
300-B East High Street
Jefferson City, Missouri 65101

Harold L. Moskowitz
Counsel for Respondents
55 West Monroe Street
Suite 1100
Chicago, Illinois 60603

David R. Herzog
Herzog & Schwartz, PC
77 W. Washington Suite 1717
Chicago, Illinois 60602
drhlaw@mindspring.com


