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IN THE CHANCERY COURT OF THE STATE OF TENNESSEE  
TWENTIETH JUDICIAL DISTRICT, DAVIDSON COUNTY

CHLORA A. LINDLEY-MYERS )  
SPECIAL DEPUTY COMMISSIONER OF )  
COMMERCE AND INSURANCE FOR )  
THE STATE OF TENNESSEE, )

Petitioner, )

v. )

SMART DATA SOLUTIONS, LLC )  
a Tennessee limited liability company, )  
AMERICAN TRADE ASSOCIATION, )  
INC, an Indiana nonprofit corporation with )  
its principal place of business in Tennessee, )  
AMERICAN TRADE ASSOCIATION, )  
LLC, an Arkansas limited liability company, )  
SERVE AMERICA ASSURANCE, )  
a corporation with an unknown location, )  
BART S. POSEY SR., ANGIE POSEY )  
OBED W. KIRKPATRICK, RICHARD )  
H. BACHMAN, WILLIAM M. WORTHY )  
and COLIN YOUELL )

Respondents. )

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No. 10-507-III

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**ORDER GRANTING LIQUIDATOR'S MOTION TO ESTABLISH  
AN ABSOLUTE BAR DATE AS TO CLAIMS AGAINST  
THE ATA/SDS/SAA LIQUIDATION ESTATE**

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On March 8, 2013, Chlora A. Lindley-Myers in her capacity as Special Deputy Commissioner of Commerce and Insurance for this receivership matter and as Statutory Liquidator of Smart Data Solutions, LLC ("SDS"), American Trade Association, Inc., American Trade Association, LLC (collectively referred to as "ATA"), and Serve America Assurance ("SAA"), by and through counsel, filed a motion requesting the Court to establish an absolute

bar date of **Friday, March 29, 2013, at 4:30 p.m. (Central Time)** for receipt of claims against the ATA/SDS/SAA Liquidation estate. There has been no filing of opposition to this motion pursuant to Rule 26.04 (d) and (e) of the Local Rules of Practice.

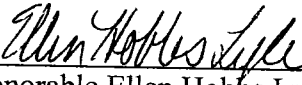
Based upon the motion and the record as a whole, the Court finds the motion well taken. The Court finds that establishment of an absolute bar date for submission of claims against the Liquidation is needed so that the Liquidation can progress, in an orderly fashion, to closure.

Accordingly, the Liquidator's motion is GRANTED, and it is hereby ORDERED as follows:

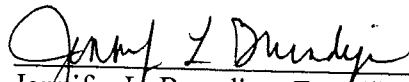
- (1) The absolute bar date for submission of claims against the ATA/SDS/SAA Liquidation of **March 29, 2013, at 4:30 p.m. (Central Time)** is established.
- (2) Any claim received by the Liquidation after that date and time will be rejected and will not be considered any further. The Liquidation will notify the sender that the claim is not accepted because of the court-ordered absolute bar date and will return any submitted claim information.

The Court further finds that the Liquidator needs the ability to rely upon the absolute claims bar date when taking action impacting the progression of the Liquidation. To provide certainty to the actions taken by the Liquidator in reliance on the passing of the deadline established herein, the Court finds that there exists no just reason for delay and expressly instructs the Clerk and Master to enter this Order as a final order pursuant to Tenn. R. Civ. P. 54.02 regarding all matters addressed herein.

It is so ORDERED this the \_\_\_ day of March, 2013.

  
\_\_\_\_\_  
Honorable Ellen Hobbs Lyle  
Chancellor

Submitted and Approved for Entry:



Jennifer L. Brundige, Esq. (#020673)

LUNA LAW GROUP, PLLC

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*Special Counsel for the Liquidator and  
Special Deputy Liquidator*

**CERTIFICATE OF SERVICE**

I hereby certify this the 21<sup>st</sup> day of March, 2013, that a true and exact copy of the foregoing proposed order has been served by U.S. mail, postage pre-paid, and/or via email as indicated, to the parties and interested entities listed on the attached service list.

**Attorneys For Petitioner**

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**Respondent Serve America Assurance, Ltd.:**

Serve America Assurance, Ltd. Company

117 Winding Oak Way

Blythewood, South Carolina 29016

Serve America Assurance, Ltd.  
c/o Beema Pakistan Company, Ltd.  
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**Individual Respondents:**

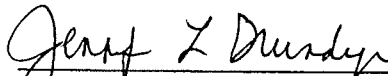
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**(Unknown, not able to deliver to this address)**

  
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