

Affirmative Defenses

2. Defendants assert the applicable statute of limitations.
3. Defendants assert the defense of waiver, estoppel and ratification, to the extent that all actions complained of were known to and approved by, the Texas Department of Insurance.
4. Defendants assert the defense of business justification.

Prayer

WHEREFORE, PREMISES CONSIDERED, Defendants, James Douglas Maxwell, James Thornton Maxwell, U.S. Auto Insurance Services, Inc., Gamma Group, Inc., Alpha Partners, Ltd., and CSI Agency Services, Inc. pray for judgment of the Court as follows:

1. That Plaintiff takes nothing by its suit; and
2. That Defendants recover all costs, including attorney fees, and be awarded such other and further relief to which they may be entitled.

Respectfully Submitted,

RENTEA & ASSOCIATES

/s/ Bogdan Rentea

BOGDAN RENTEA

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**ATTORNEYS FOR DEFENDANTS,
JAMES DOUGLAS MAXWELL, JAMES
THORNTON MAXWELL, U.S. AUTO
INSURANCE SERVICES, INC., GAMMA
GROUP, INC., and ALPHA PARTNERS,
LTD., CSI AGENCY SERVICES, INC.**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served on the parties on this **6th day of April 2015** as follows:

Christopher Fuller
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Phone: (512) 470-9544
**ATTORNEYS FOR PLAINTIFF,
CANTILLO & BENNETT, L.L.P.,
SPECIAL DEPUTY RECEIVER OF
SANTA FE AUTO INSURANCE
COMPANY, INC.**

Via E-service

/s/ Bogdan Rentea
Bogdan Rentea