

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

M. DIANE KOKEN, Insurance
Commissioner of the Commonwealth of
Pennsylvania,
In her official capacity as Liquidator of
RELIANCE INSURANCE COMPANY

Plaintiff,

v.

RELIANCE INSURANCE COMPANY,

Defendant.

No. 269 M.D. 2001

RECEIVED AND FILED
COMMONWEALTH COURT
OF PENNSYLVANIA
2006 NOV 13 P 12:49

RE: LIQUIDATOR'S PETITION REGARDING
ADMINISTRATION OF GUARANTY ASSOCIATION CLAIMS

ORDER

This matter having come before the Court on the Petition of M. Diane Koken, Insurance Commissioner of the Commonwealth of Pennsylvania, in her official capacity as Statutory Liquidator ("Liquidator") of Reliance Insurance Company, to Supplement the Court's September 9, 2002 Claims Procedures Order, said Petition is GRANTED. It is further ORDERED that the Court's September 9, 2002 Claims Procedures Order is specifically altered as follows and applies to all claims submitted by the various Guaranty Associations in the Reliance liquidation proceeding.

A. Filing of Claims

1. The guaranty associations by statute are obligated to pay the insolvent insurer's covered claims in accordance with, and subject to the limitations set forth in their governing statutes, and therefore are not filing a third party claim against the insured as envisioned by

Section 540(a), thus the release language required by Section 540(a) may be omitted from the guaranty associations omnibus proofs of claim due to its inapplicability.

B. Review of Claims

2. The Liquidator shall file a separate report, periodically, in accordance with paragraphs 10(c) and 13 of this Court's September 9, 2002 Claims Procedures Order for the undisputed and settled guaranty association claims and serve Notice of the filing on all of the guaranty associations as well as the Master Service List.

3. The Liquidator is authorized to issue individual notices of determinations to the various guaranty associations only for those Guaranty Association Claims where the claim will not be allowed by the Liquidator or will be disputed by the guaranty association(s) as to the priority classification or the amount.

4. The failure of the Liquidator to disallow, dispute or object to any particular Guaranty Association Claim of any type during her reviews and/or reconciliations shall not preclude, by estoppel or waiver or other theory, a future disallowal, dispute, or objection by the Liquidator as to the same or similar type of guaranty association claim submitted by the same or any other guaranty association.

5. All other aspects and provisions of this Court's September 9, 2002 Claims Procedures Order that are not being specifically altered pursuant to this Order including, but not limited to, the procedures, requirements and deadlines for filing objections to and resolution of any disputed claims shall be continued in full force and effect and shall apply with equal force to all the Guaranty Association Claims filed in the Reliance liquidation proceeding.

6. The Court recognizes that the guaranty associations have reserved all rights under Pennsylvania law, their respective statutes, and any other applicable law and that the Liquidator

similarly reserves all her rights under Pennsylvania law, including but not limited to, Article V of the Pennsylvania Insurance Department Act, 40 P.S. §§221.1-221.63.

BY THE COURT:

James Gardner Colins, President Judge

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

M. DIANE KOKEN, Insurance :
Commissioner of the Commonwealth of :
Pennsylvania, :
In her official capacity as Liquidator of :
RELIANCE INSURANCE COMPANY :
 : No. 269 M.D. 2001
Plaintiff, :
 :
v. :
 :
RELIANCE INSURANCE COMPANY, :
 :
Defendant. :

RECEIVED
COMMONWEALTH COURT
OF PENNSYLVANIA
2002 NOV 13 P 12:49

**LIQUIDATOR’S PETITION TO SUPPLEMENT THE COURT’S SEPTEMBER 9, 2002
CLAIMS PROCEDURES ORDER TO ADDRESS THE
ADMINISTRATION OF GUARANTY ASSOCIATION CLAIMS**

Petitioner, M. Diane Koken, Insurance Commissioner of the Commonwealth of Pennsylvania, in her official capacity as Statutory Liquidator (“Liquidator”) of Reliance Insurance Company (“Reliance or Estate”), petitions the Court for approval of the attached Proposed Order supplementing the Court’s September 9, 2002 Claims Procedures Order (“Claims Procedures Order”) to specifically alter certain aspects of the established claims filing procedure and disputed claims resolution process when administering the claims submitted by the various state guaranty associations in the Reliance liquidation proceeding. In support of this Petition, the Liquidator avers as follows:

I. BACKGROUND

A. **The Liquidation of Reliance and Appointment of the Insurance Commissioner as Liquidator**

1. On May 29, 2001, this Court entered an Order of Rehabilitation with respect to Reliance pursuant to Article V of the Pennsylvania Insurance Department Act, 40 P.S. §§221.1 – 221.63 (“the Act”) and appointed the Pennsylvania Insurance Commissioner as Rehabilitator.

2. This Court subsequently terminated the rehabilitation of Reliance and, by Order dated October 3, 2001, declared Reliance to be insolvent, issued an Order of Liquidation pursuant to 40 P.S. §§221.18 and 221.20 (the “Liquidation Order”) and appointed the Pennsylvania Insurance Commissioner as Liquidator of Reliance.

3. The Liquidator is statutorily charged with marshaling the assets of the insolvent insurer, determining the liabilities of the insolvent insurer and ultimately distributing the assets to the policyholders, creditors and claimants of the Estate in accordance with the mandates set forth in Section 544 of the Act.

4. Section 544 of the Act establishes the order of distribution among nine classes of claims in a liquidation. In descending order of priority, the classes of claims set forth in Section 544 of the Act are, generally: (a) the costs and expenses of administration; (b) all claims under policies for losses; (c) claims of the federal government; (d) debts, not to exceed \$1,000, due to employees for services performed within one year before the petition for liquidation; (e) certain claims for unearned premiums or other premium refunds and claims of general creditors; (f) claims of state or local government; (g) claims filed late, claims under 40 P.S. §221.39(b) that were disallowed under that section, and claims or portions thereof, payment of which is provided by other benefits or advantages recovered by the claimant; (h) surplus or contribution notes, or

similar obligations, and premium refunds on assessable policies; and (i) claims of shareholders or other owners. See 40 P.S. §§221.44(a) – (i).

5. Section 544 further provides that “[e]very claim in each class shall be paid in full or adequate funds retained for such payment before the members of the next class receive any payment.” For example, all class “a” claims must be paid in full before any class “b” claims are paid; all class “b” claims must be paid in full before any class “c” claims are paid and so on.

B. Claim Procedures Under the Act, the Liquidation Order and the Claims Procedures Order

6. To assist the Liquidator in fulfilling her responsibility to maximize the insolvent insurer’s assets for the ultimate distribution to the policyholders, creditors and claimants, the Act establishes a centralized proof of claim process and a single forum for the adjudication of claims. The proof of claim process prescribed by the Act ensures that all of the insolvent insurer’s policyholders, creditors and claimants are treated uniformly and equitably, regardless of their individual circumstances.

7. The Act, the Court’s Liquidation Order and the Court’s September 9, 2002 Order regarding a Claims Filing Procedure and a Disputed Claims Resolution Process specify in detail the deadline for the submission of claims by creditors against Reliance, the procedures and requirements for filing and administering proofs of claim during the liquidation proceeding and the process for resolution of any claim determinations disputed by said creditors. See 40 P.S. §§221.37, 221.38, 221.44; See also Liquidation Order, paragraphs 19 and 20; and Claims Procedures Order. The general framework for the centralized proof of claim process is described below in paragraphs 8 through 14 of this Petition.

8. With certain exceptions, Section 537 of the Act mandates that proof of all claims shall be filed with the Liquidator in the form required by Section 538 of the Act and filed on or before the last day for filing specified in the notice given to potential claimants pursuant to the Act and the Liquidation Order. 40 P.S. §§221.37(a), 221.38(a) and 221.24; Liquidation Order, paragraph 19; Claims Procedures Order, paragraph 1.

9. Section 538(a) of the Act mandates that a duly filed proof of claim shall consist of a statement signed by the claimant that includes all of the following that are applicable: “the particulars of the claim including the consideration given for it;” “the identity and amount of the security on the claim;” “the payments made on the debt, if any;” “that the sum claimed is justly owing and that there is no setoff, counterclaim or defense to the claim;” “any right of priority of payment or other specific right asserted by the claimants;” “a copy of the written instrument which is the foundation of the claim;” “in the case of any third party claim based on a liability policy issued by the insurer, a conditional release of the insured pursuant to Section 540(a);” and “the name and address of the claimant and the attorney who represents him, if any.” 40 P.S. §221.38(a). Section 538(a) further provides that “[n]o claim need be considered or allowed if it does not contain all the foregoing information which may be applicable. Id. The liquidator may require that a prescribed form be used, and may require that other information and documents be included.” Id.

10. Section 538(d), however, relaxes the requirements of subsection (a) specifically for guaranty associations by providing that “[a] claim of a guaranty association for reimbursement of payments made for the payments of covered claims and for expenses shall be

in such form and contain such substantiation as may be agreed to by the guaranty association and the liquidator subject to review by the Commonwealth Court.” 40 P.S. §221.38(d)

11. Pursuant to the Act, the Liquidator is required to review the claims duly filed in the liquidation proceeding and make such further investigation as she deems necessary. See 40 P.S. §221.45(a). To assist the Liquidator in her review of duly filed claims, the Liquidator “may request the claimant to present information or evidence supplementary to that required under subsection (a) and may take testimony under oath, require production of affidavits or depositions, or otherwise obtain additional information or evidence.” 40 P.S. §221.38(b).¹ The Claims Procedures Order also directs that “the Liquidator shall review all Proofs of Claim, including supporting documentation, submitted in this case, and the Liquidator is authorized to request additional information where, in her discretion, said information is necessary. . . .” (Claims Procedures Order ¶ 10.) and that the Liquidator “reserves the right to require other information it deems necessary to consider a claim.” (Claims Procedures Order ¶ 7.)

12. Section 537(b) allows the Liquidator to “permit a claimant making a late filing to share in distributions, . . . as if he were not late . . .” upon a showing of good cause.² 40 P.S. §221.37(b)(1) - (5). See also Liquidation Order, paragraph 19; and Claims Procedures Order, paragraph 9.

¹ Additionally, Section 523(5), authorizes the Liquidator “[t]o hold hearings, to subpoena witnesses, to compel their attendance, to administer oaths, to examine any person under oath, and to compel any person to subscribe to his testimony after it has been correctly reduced to writing, and in connection therewith to require the production of any books, papers, records or other documents which he deems relevant to the inquiry.”

² Pursuant to Section 537(b), good cause specifically includes: (5) that the claim was the claim of a guaranty association for reimbursement of covered claims paid and/or expenses incurred, subsequent to the last day for filing where such payments were made and expenses incurred as a result of requirements of law.

13. Section 541 of the Act prescribes that the Liquidator must give written notice of her determination of a claim to a claimant and the claimant has sixty (60) days from the mailing of the notice to file any objections to the determination. 40 P.S. §221.41(a); See also Claims Procedures Order, paragraph 10(d). Section 541(b) further prescribes the process for addressing and resolving any objections filed by a claimant to the Liquidator's written notice of the determination. 40 P.S. §221.41(b); See also Claims Procedures Order, paragraphs 10 through 15.

14. In accordance with Section 545 of the Act, the Liquidator is required to present to the Court a report of the claims determined by the Liquidator to which no objections were filed along with her recommendations. The Court may approve, disapprove or modify the Liquidator's report on claims. 40 P.S. §221.45(a), (b); See also Claims Procedures Order, paragraph 10(c).

C. The Role of State Guaranty Associations in Insurer Insolvencies

15. Most states have established guaranty associations to provide a means for the payment of covered claims under certain property and casualty insurance policies, to avoid excessive delay in the payment of such claims and to avoid financial loss to claimants or policyholders as a result of the insolvency of an insurer. 40 P.S. §991.1801(1). The guaranty associations are separate legal entities created by statute³ that are obligated to pay covered claims

³ Although the guaranty associations are created and governed by their respective statute, most guaranty association statutes contain provisions substantially similar to those contained in the statute that governs the Pennsylvania Property and Casualty Insurance Guaranty Association (the "PPCIGA"), Pennsylvania's property and casualty guaranty association. Therefore, the Liquidator cites the PPCIGA statute for reference purposes.

of the insolvent insurer in accordance with, and subject to the limitations set forth in, their governing statutes. 40 P.S. §991.1803(b)

16. The guaranty associations have an integral role in liquidations because the guaranty associations are deemed the insurer to the extent of its obligation on the covered claims and, to such extent, shall have all rights, duties and obligations of the insolvent insurer as if that insurer had not become insolvent. 40 P.S. §991.1803(b)(2). The guaranty associations are required to periodically file with the liquidator of the insolvent insurer supporting information regarding its payment of the covered claims paid which preserves the rights of the guaranty association against the assets of the insolvent insurer for ultimate distribution pursuant to the Act.⁴ 40 P.S. §991.1816(d) and 40 P.S. §221.44. The guaranty associations covered claims are accorded a priority equal to that which the claimant whose claim has been paid would have been entitled to against the assets of the insolvent insurer. 40 P.S. §991.1816(c).

17. In all states where the insurer was licensed to do business the guaranty associations, security funds or entities performing substantially equivalent functions, are statutorily obligated to pay the covered claims of an insolvent insurer, in accordance with, and subject to the limitations set forth in, their governing statutes, once a liquidation order with a declaration of insolvency has been entered by the liquidating court such as the Commonwealth Court. 40 P.S. §991.1803.

18. The various guaranty associations' claims typically fall under several different classes. Pursuant to Section 544(a) of the Act, class "a" specifically provides that the "...

⁴ Pursuant to 40 P.S. §221.36(b)(5), and the refunding agreements entered into between the Liquidator and guaranty associations, the guaranty associations are required to provide reports at such time and covering such matters as the Liquidator may determine including, but not limited to, the guaranty associations disbursement of assets.

expenses of a guaranty association in handling claims” shall be considered among the “costs and expenses of administration” (hereinafter referred to as “Administrative Expense Claims”) and as such are included in the highest priority class. 40 P.S. §221.44(a). Pursuant to Section 544(b) of the Act, class “b” specifically provides for “claims under policies for losses...” and thus are accorded the second highest priority class. 40 P.S. §221.44(b). Pursuant to Section 544 of the Act, class “e” specifically provides for “claims ... for unearned premium...” and class “g” provides for “claims or portions of claims, payment of which is provided by other benefits or advantages recovered by the claimant.” 40 P.S. §221.44(e) and §221.44(g), respectively. All guaranty association claims other than Administrative Expense Claims are for simplistic purposes collectively referred to as “Policy Claims”.

19. In most liquidation proceedings, including Reliance, due to the on-going nature of the relationship between the Liquidator and the guaranty associations, the guaranty associations file omnibus proofs of claim covering all classes of their claims. Although paragraph 3 of this Court’s September 9, 2002 Claims Procedures Order requires that a separate proof of claim be completed and filed for each claim, this Court, by Order dated December 11, 2003, approved the form and substance of the Liquidator’s refunding agreements with the guaranty associations thereby authorizing the guaranty associations to file omnibus proofs of claim in lieu of separate proofs for each claim. All guaranty associations have submitted timely filed omnibus proofs of claim covering all classes of their claims.

20. In most liquidation proceedings, including Reliance, the guaranty associations typically receive the largest dollar share of distributions made by the Liquidator for class “b” claims because the guaranty associations throughout the liquidation proceeding administer, and

make payment on, the majority of the claims under policies for losses pursuant to their governing statutes.

21. The guaranty associations are currently administering 18,406 claim files related to Reliance proofs of claim. Further, from October 3, 2001 through June 30, 2006, the guaranty associations have reported that they have collectively paid approximately \$2.2 billion in Policy Claims as a result of the Reliance liquidation, and have projected a total incurred value of approximately \$4.2 billion for Policy Claims. In addition, the guaranty associations have also submitted reports reflecting approximately \$184 million paid in administrative expenses, representing their Administrative Expense Claims. (Policy Claims and Administrative Expense Claims may hereinafter be referred to collectively as “Guaranty Association Claims”).

D. The Need for a Supplement to the September 9, 2002 Claims Procedures Order for the Administration of Guaranty Association Claims

22. To assist her in fulfilling her fiduciary and statutory responsibilities under the Act including her recommendations to this Court pursuant to 40 P.S. §221.45 seeking the Court’s approval of the Guaranty Association Claims, the Liquidator has undertaken a number of initiatives, as previously reported in her quarterly status reports to this Court, to review and reconcile the information reported by the guaranty associations for their Policy Claims, including the loss and allocated loss adjustment expenses incurred by the guaranty associations under a policy, and Administrative Expense Claims.

23. Regarding the Administrative Expense Claims, to date the Liquidator has visited 35 guaranty associations to review the supporting documentation for their Administrative Expense Claims and ensure compliance with the requirements of the Act.

24. Regarding the Policy Claims, the Liquidator has established a procedure for the review and reconciliation of the summary claims information provided by the guaranty associations (both electronic and manual) to Reliance on a regular basis. Further, the Liquidator reviews the amounts paid and the voluminous information at an individual claim level to ensure compliance with the requirements and limitations imposed by the Act through a procedure for the review of closed Policy Claim files after they have been returned to the Liquidator by the guaranty associations. To date, the Liquidator has conducted 130 on-site reviews of the guaranty associations Policy Claim information, primarily for reinsurance reporting purposes.

25. Due to the sheer volume of Policy Claims and Administrative Expense Claims information provided by the guaranty associations that must be reviewed and reconciled by the Liquidator and the anticipated volume of guaranty associations claims information that has yet to be submitted, the Liquidator believes that a supplement to the Court's September 9, 2002 Claims Procedures Order to specifically alter certain aspects of the established claims filing procedure and disputed claims resolution process will assist the Liquidator in efficiently and economically administering the Guaranty Association Claims and thus is in the best interests of the Estate, its policyholders, creditors and the public.

26. The guaranty associations reserve all rights under Pennsylvania law, their respective guaranty association statutes, and any other applicable law. The Liquidator similarly reserves all of her rights under Pennsylvania law including, but not limited to, the Act.

II. PROPOSED SUPPLEMENT TO SEPTEMBER 9, 2002 CLAIMS PROCEDURES ORDER

27. To efficiently and economically administer the Guaranty Association Claims, the Liquidator proposes and respectfully requests that the Court issue a supplement to its Claims

Procedures Order that specifically alters certain aspects of the established claims filing procedure and disputed claims resolution process when administering all claims submitted by the various state guaranty associations in the Reliance liquidation proceeding as follows.

A. Filing of Claims

28. Pursuant to 40 P.S. §221.38(7), a proof of claim shall consist of, inter alia, a “release of the insured pursuant to section 540(a)”. Section 540(a) provides that “the filing of the claim shall operate as a release of the insured’s liability ... in the amount of the applicable policy limit, but the liquidator shall also insert in any form used for the filing of third party claims appropriate language to constitute such a release”. 40 P.S. §221.40(a). Since the guaranty associations by statute are obligated to pay the insolvent insurer’s covered claims, in accordance with, and subject to the limitations set forth in their governing statutes, and therefore are not filing a third party claim against the insured as envisioned by Section 540(a), the Liquidator respectfully requests that she be authorized to omit the release language required by Section 540(a) from the guaranty associations omnibus proofs of claim for Policy Claims due to its inapplicability.

B. Review of Claims

29. Pursuant to the Claims Procedures Order and this Court’s April 1, 2004 Order, the Liquidator is required to file with the Court a report of the claims determined by the Liquidator to which no objection was filed (“undisputed claims”) and of the claims that were settled (“settled claims”) by the Liquidator and serve a Notice of the filing on the Master Service List. See Claims Procedure Order, paragraphs 10(c) and 13.⁵ The Liquidator respectfully submits that

⁵ Pursuant to paragraph 14 of the Claims Procedures Order, the Liquidator is required to file a separate petition to seek the Court’s approval for the settlement of any claim in the amount of \$1,000,000 or more.

she shall file a separate report, periodically, in accordance with paragraphs 10(c) and 13 for the undisputed and settled Guaranty Association Claims and serve Notice of the filing on all of the guaranty associations as well as the Master Service List.

30. In conducting her reviews and reconciliations of the Guaranty Association Claims as described above, the Liquidator and the guaranty associations continually engage in discussions and negotiations, if necessary, concerning their claims. Pursuant to paragraph 3 and 10(b) of the Claims Procedures Order, a separate proof of claim should be filed for each claim and the Liquidator shall provide a written notice of determination for each proof of claim. Subsequently, in accordance with this Court's December 11, 2003 Order, the guaranty associations have filed omnibus proofs of claim that cover their voluminous Guaranty Association Claims as opposed to a separate proof of claim for each specific claim. The issuance of individual notices of determination would be very time consuming and costly to the Estate.⁶ Accordingly, the Liquidator respectfully requests that she be authorized to issue individual notices of determinations to the various guaranty associations only for those Guaranty Association Claims where the parties discussions and negotiations have not been successful, and thus the claim will not be allowed by the Liquidator or will be disputed by the guaranty association(s) as to the priority classification or the amount.

31. The Liquidator must review a voluminous amount of information from the guaranty associations supporting their claims. The primary means of ensuring compliance with the Act are the closed claim file reviews for Policy Claims and the on-site reviews for Administrative Expense Claims. These reviews and reconciliations take place over many years and on different time schedules for different guaranty associations. Consequently, the Liquidator

⁶ Based on the experience of the Liquidator to date in the Reliance liquidation proceeding, the Liquidator anticipates that the vast majority of the Guaranty Association Claims will be undisputed.

respectfully requests that failure of the Liquidator to disallow, dispute or object to any particular Guaranty Association Claim of any type during her reviews and/or reconciliations should not preclude, by estoppel or waiver or other theory, a future disallowal, dispute, or objection by the Liquidator as to the same or similar type of Guaranty Association Claim submitted by the same or any other guaranty association.

III. THE BEST INTERESTS OF THE ESTATE

32. The proposed supplement to the Court's September 9, 2002 Claims Procedures Order, if approved, will result in substantial benefits to the Reliance Estate. The proposed supplement will assist the Liquidator in administering the voluminous claims submitted by various guaranty associations in the Reliance liquidation proceeding in a cost-efficient and effective manner while affording the Liquidator with a viable mechanism that will assist her in reviewing and reconciling the voluminous information reported to the Liquidator to ensure that the Guaranty Associations Claims are evaluated in accordance with the requirements and limitations of the Act.

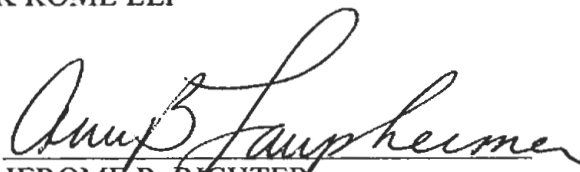
33. In furtherance of the Liquidator's fiduciary and statutory obligations, the proposal maintains consistency with the statutory goal of liquidation, achieves the prompt and economical administration of the most significant body of claims, in dollars and numbers, asserted against the Estate and assures the proper recognition of priorities while achieving a reasonable balance between the expeditious completion of the liquidation and the protection of unliquidated and undetermined claims against the Estate.

34. Accordingly, the Liquidator respectfully requests that this Court enter an Order in the form attached hereto supplementing this Court's September 9, 2002 Claims Procedures Order to specifically alter certain aspects of the established claims filing procedure and disputed claims

resolution process when administering the claims submitted by the various state guaranty associations. The Liquidator further requests that this Court direct that all other aspects and provisions of the September 9, 2002 Claims Procedures Order that are not being specifically altered pursuant to this Petition including, but not limited to, the procedures, requirements and deadlines for filing objections to and resolution of any disputed claims be continued in full force and effect and apply with equal force to the Guaranty Association Claims.

WHEREFORE, the Liquidator respectfully requests that this Court grant this Petition and Order the relief requested herein.

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By: 
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Attorneys for M. Diane Koken,
Insurance Commissioner of the
Commonwealth of Pennsylvania, in her
official capacity as Liquidator of
Reliance Insurance Company

Dated: November 10 2006

VERIFICATION

I, David S. Brietling, have been retained by M. Diane Koken, Insurance Commissioner of the Commonwealth of Pennsylvania, and am responsible for the on-site insurance and financial operations of Reliance Insurance Company (in Liquidation) as Chief Liquidation Officer. I am also responsible for coordinating the activities of the Pennsylvania Insurance Department's Reliance liquidation team. I am authorized by the Insurance Commissioner to make this verification on behalf of the Liquidator of Reliance Insurance Company. I hereby verify that the facts set forth in the foregoing Petition are true and correct to the best of my knowledge, information and belief.

I understand that this Verification is made subject to the penalties of 18 P.S. § 4904 relating to unsworn falsification to authorities.

Date: Nov 3, 2006



David S. Brietling
Chief Liquidation Officer

CERTIFICATE OF SERVICE

I, Sheila E. Branyan, hereby certify that on or about this day, pursuant to the Court's Order of April 1, 2004, service of the foregoing Petition of the Liquidator to Supplement the Court's September 9, 2002 Claims Procedures Order to Address the Administration of Guaranty Association Claims was made on the attached Master Service List through the transmission of a Notice of Filing and through posting of a true and correct copy in PDF file format on the Reliance Documents website (www.reliancedocuments.com).

Dated: November 13, 2006


SHEILA E. BRANYAN

Master Service List

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v.

Reliance Insurance Company

No. 269 M.D. 2001 (Commonwealth Court of Pennsylvania)

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