

RECEIVED AND FILED  
COMMONWEALTH COURT  
OF PA. (PHILA)

2008 DEC -14 A 10:11

**IN THE COMMONWEALTH COURT OF PENNSYLVANIA**

JOEL S. ARIO,  
Insurance Commissioner of the  
Commonwealth of Pennsylvania,  
in his official capacity as Liquidator  
of Reliance Insurance Company,

Plaintiff,

v.

RELIANCE INSURANCE COMPANY,

Defendant.

No. 269 M.D. 2001

**RE: PETITION TO EXTEND RESPONSE DEADLINE  
FOR THE LIQUIDATOR'S PETITION FOR APPROVAL  
OF REPORT AND RECOMMENDATION ON  
UNDISPUTED GUARANTY ASSOCIATION CLAIMS  
THROUGH DECEMBER 31, 2005**

**ORDER**

AND NOW, this \_\_\_\_ day of December, 2008, upon consideration of the petition by the Liquidator to extend the response deadline for the Liquidator's Petition for Approval of Report and Recommendation on Undisputed Guaranty Association Claims through December 31, 2005, the request is GRANTED. Any responses to the Liquidator's Petition for Approval of Report

and Recommendation on Undisputed Guaranty Association Claims through December 31, 2005 must be filed with this Court no later than January 30, 2009.

The Liquidator is directed to serve a copy of this Order upon the Master Service List and all Guaranty Associations and file with this Court an affidavit stating that service has been effectuated.

---

BONNIE BRIGANCE LEADBETTER  
PRESIDENT JUDGE

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

JOEL S. ARIO,  
Insurance Commissioner of the  
Commonwealth of Pennsylvania,  
in his official capacity as Liquidator  
of Reliance Insurance Company,

Plaintiff,

v.

RELiance INSURANCE COMPANY,

Defendant.

No. 269 M.D. 2001

2008 DEC -4 A 10:12

RECEIVED AND FILED  
CLERK OF THE COURT  
OF PENNSYLVANIA

**PETITION TO EXTEND RESPONSE DEADLINE FOR THE LIQUIDATOR'S  
PETITION FOR APPROVAL OF REPORT AND RECOMMENDATION  
ON UNDISPUTED GUARANTY ASSOCIATION CLAIMS  
THROUGH DECEMBER 31, 2005**

Petitioner, Joel S. Ario, Insurance Commissioner of the Commonwealth of Pennsylvania, in his official capacity as the Statutory Liquidator ("Liquidator") of Reliance Insurance Company ("Reliance or Estate"), respectfully petitions this Court for an extension of the deadline to respond to the Liquidator's Petition for Approval of his Report and Recommendation on Undisputed Guaranty Association ("GA") Claims through December 31, 2005. In support of this Petition, the Liquidator avers the following:


1. On November 6, 2008, the Liquidator filed his Petition for Approval of Report and Recommendation on Undisputed Guaranty Association Claims through December 31, 2005 ("Report"). The Report includes 16,458 claims totaling approximately \$375 million from 43 GAs in 38 states. The Report was served on 1) all persons on the Master Service List; 2) all persons with a pending claims objection; and 3) all GAs. The response deadline, based on a thirty-day period, would normally be December 8, 2008. As of this filing, the Liquidator has received no responses or objections to the Report.

2. The Liquidator has been advised that certain GAs are having difficulty in reconciling the information provided in the Report with their books and records. Consequently, they have requested an extension of time to respond to the Report. The Liquidator does not oppose their request and further, does not anticipate any objections from the GAs once they have completed their reconciliation process.

WHEREFORE, the Liquidator respectfully requests that this Court extend the response deadline for the Report until January 30, 2009 and enter an Order in the form attached hereto.

Respectfully submitted:

By:

  
PRESTON BUCKMAN (I.D. #57570)  
Special Funds Counsel  
Pennsylvania Insurance Department  
Capitol Associates Building  
Office of Chief Counsel  
901 North 7<sup>th</sup> Street  
Harrisburg, PA 17102  
(717) 787-6009

Date: 12/4, 2008

**VERIFICATION**

I, David S. Brietling, have been retained by the 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 Report 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: December 4, 2008

  
\_\_\_\_\_  
DAVID S. BRIETLING  
Chief Liquidation Officer

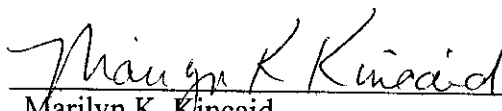
**CERTIFICATE OF SERVICE**

I, Marilyn K. Kincaid , of Reliance Insurance Company (In Liquidation), on behalf of the Statutory Liquidator of Reliance Insurance Company, herby certify that on or about this day, the Petition To Extend Response Deadline For The Liquidator's Petition For Approval Of Report And Recommendation On Undisputed Guaranty Association Claims Through December 31, 2005 was served via e-mail to the following:

Thomas W. Jenkins  
Phone: 312-443-1777  
Locke Lord Bissell & Liddell LLP  
111 S. Wacker Drive  
Chicago, Illinois 60606  
tjenkins@lockelord.com

A true and correct copy in PDF file format is posted on the Reliance Documents website ([www.reliancedocuments.com](http://www.reliancedocuments.com)).

Dated: December 4, 2008

  
\_\_\_\_\_  
Marilyn K. Kincaid  
Liquidation Team-Legal  
Reliance Insurance Company (In Liquidation)  
Three Parkway  
Philadelphia, PA 19102  
Telephone: (215) 864-4205  
Facsimile: (215) 864-4105  
On behalf of the Statutory Liquidator of  
Reliance Insurance Company