

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

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**IN RE: RELIANCE INSURANCE COMPANY  
IN LIQUIDATION**

**(Application to Intervene by Associated  
Wholesale Grocers, Inc.)**

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No. 1 REL 2001

ORDER

**AND NOW**, this \_\_\_\_ day of \_\_\_\_\_, 2014, upon consideration of the Second Application of Michael F. Consedine, Insurance Commissioner of the Commonwealth of Pennsylvania, as Statutory Liquidator of Reliance Insurance Company, for an Extension of the Time to File a Response in Opposition to the Associated Wholesale Grocers, Inc.'s Motion for Limited Intervention (the "Intervention Motion"), and there being no opposition thereto, the Application is hereby **GRANTED**.

The time for filing a response to the Intervention Motion filed by Associated Wholesale Grocers, Inc. is hereby extended until Tuesday, October 21, 2014.

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**BONNIE BRIGANCE LEADBETTER,**  
Judge

**IN THE COMMONWEALTH COURT OF PENNSYLVANIA**

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**IN RE: RELIANCE INSURANCE COMPANY  
IN LIQUIDATION**

**(Application to Intervene by Associated  
Wholesale Grocers, Inc.)**

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No. 1 REL 2001

**LIQUIDATOR'S SECOND UNOPPOSED APPLICATION  
FOR AN EXTENSION OF THE TIME TO FILE A  
RESPONSE IN OPPOSITION TO THE MOTION FOR LIMITED  
INTERVENTION OF ASSOCIATED WHOLESALE GROCERS, INC.**

Michael F. Consedine, Insurance Commissioner of the Commonwealth of Pennsylvania, as Statutory Liquidator of Reliance Insurance Company ("Liquidator"), hereby submits his unopposed Application for a second extension of the time to file his response in opposition to Associated Wholesale Grocers, Inc.'s ("AWG") Motion for Limited Intervention, and states as follows:

1. On or around August 27, 2014, AWG filed a motion seeking to intervene in these liquidation proceedings for the purpose of filing an "Application for the Distribution and Projection" (the "Intervention Motion").
2. The Liquidator first received a copy of the Intervention Motion on or around August 27, 2014.
3. On September 8, 2014, the Liquidator filed an unopposed application for the extension of the time to file a response in opposition to the Intervention Motion.
4. Pursuant to the Court's Order dated September 11, 2014, the time for the Liquidator to respond to the Intervention Motion was extended to September 30, 2014.

5. Counsel for Reliance (in Liquidation) and counsel for AWG have been in communications since the filing of the Intervention Motion to jointly propose an efficient procedural process for the consideration of AWG's motion.

6. Given the parties' ongoing communications, the Liquidator respectfully requests a second extension, until Tuesday, October 21, 2014, to respond to the Intervention Motion.

7. AWG has agreed to this extension and does not oppose this request for an extension of time until October 21, 2014.

**WHEREFORE**, the Liquidator respectfully requests that the Court enter an Order, in the proposed form attached hereto, granting an extension until Tuesday, October 21, 2014, for the Liquidator to file his response in opposition to the Intervention Motion.

Respectfully submitted,

**KLEINBARD BELL & BRECKER, LLP**



Steven J. Engelmyer, Esquire  
Lorena E. Ahumada, Esquire  
Attorney I.D. Nos.: 42840 and 91630  
One Liberty Place, 46<sup>th</sup> Floor  
1650 Market Street  
Philadelphia, PA 19103  
(215) 568-2000

Date: September 30, 2014

**CERTIFICATE OF SERVICE**

I, Lorena E. Ahumada, counsel for Reliance Insurance Company (In Liquidation) in this matter, hereby certify that on this 30th day of September, 2014, I caused a true and correct copy of the Liquidator's Second Unopposed Application for an Extension of the Time to File a Response in Opposition to AWG's Intervention Motion to be served upon the following in the manner indicated below and pursuant to the attached Master Service List:

Dwayne F. Stanley, Esquire  
Theresa L. Critchfield, Esquire  
Hush Blackwell LLP  
190 Carondelet Plaza, Suite 600  
St. Louis, Missouri 63105

(via U.S. Mail)

A handwritten signature in black ink, appearing to read 'L. Ahumada', written over a horizontal line.

Lorena E. Ahumada, Esq.