

**COPY**

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M. DIANE KOKEN :  
Insurance Commissioner of the :  
Commonwealth of Pennsylvania, :  
: :  
Plaintiff, :  
: :  
v. :  
: :  
RELIANCE INSURANCE COMPANY, :  
: :  
Defendant. :  


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DOCKET NO. 269 MD 2001

**RESPONSE OF THE LIQUIDATOR TO CERTAIN APPLICATIONS FOR LEAVE TO INTERVENE AND SUBMISSIONS FILED IN RESPONSE TO THE PETITION TO APPROVE GUIDELINES REGARDING THE DIRECT PAYMENT OF REINSURANCE PROCEEDS**

Petitioner M. Diane Koken, Insurance Commissioner of the Commonwealth of Pennsylvania, in her official capacity as Liquidator of Reliance Insurance Company ("Liquidator"), respectfully submits this Response to Certain Applications for Leave to Intervene filed by CSX Insurance Company ("CSXIC"), Clients Assurance Pool, Ltd. ("CAP"), Citicorp Insurance USA, Inc. ("CIUSA"), Citicorp, and the Submission on Behalf of Celanese Americas Corporation, Elwood Insurance Ltd., and Celwood Insurance Company (collectively, "Celanese") in Support of the Petition to Approve Guidelines Regarding the Direct Payment of Reinsurance Proceeds Pursuant to 40 P.S. § 221.34 ("Petition").

The Liquidator responds as follows:

1. The Liquidator does not oppose the requests for intervention of CSXIC, CAP, CIUSA and Citicorp. Nor does the Liquidator oppose the filing and docketing of

CSXIC's Statement of Support for "Cut Through" Guidelines, the Answer of CAP to the Petition, or the Submission of Celanese in support of the Petition.

WHEREFORE, the Liquidator respectfully requests that this Court grant the requests for intervention by CSXIC, CAP, CIUSA, and Citicorp and permit the docketing of the Submission of Celanese and reiterates her own request that this Court approve the Petition and the Guidelines for Enforcement of 40 P.S. § 221.34, and order such other relief as this Court deems necessary and appropriate.

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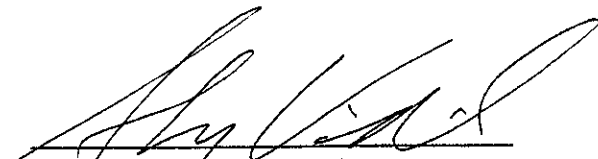
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as Liquidator of Reliance Insurance Company

Dated: April 18, 2002

CERTIFICATE OF SERVICE

I, Anthony Vidovich, hereby certify that this day a true and correct copy of the foregoing Petition was served on all persons listed on the attached Master Service List by U.S. Mail, postage prepaid.

Dated: April 18, 2002

  
ANTHONY VIDOVICH

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v.

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

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