

Albany County Clerk
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At the Supreme Court of the State of
New York, County of Albany, at the
Courthouse, 16 Eagle Street, in the
County and City of Albany, State of
New York, on the 1st day of
July, 2013.

P R E S E N T:

HON. RICHARD M. PLATKIN, J.S.C.

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In the Matter of

Index No.: 000097/2006

the Liquidation of

ORDER TO SHOW CAUSE

FRONTIER INSURANCE COMPANY.

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Based on the attached affirmation (the "Affirmation") of Eric S. Hong, an attorney with the New York Liquidation Bureau (the "Bureau"), the entity that carries out the duties of Benjamin M. Lawsky, Superintendent of Financial Services of the State of New York as liquidator (the "Liquidator") of Frontier Insurance Company ("Frontier"), dated June 25, 2013, and upon all the papers previously submitted and all proceedings heretofore had herein;

NOW, on motion of John Pearson Kelly, attorney for the Liquidator, and after due deliberation having been had thereon,

LET all claimants and parties interested in the affairs of Frontier show cause before this Court at Albany County Courthouse, located at 16 Eagle Street, in the County and City of Albany, State of New York, on the 6th day of September, 2013 ("Return Date") at 10:30 o'clock a.m., or as soon thereafter as counsel can be heard, why an order should not be made, pursuant to Article 74 of the New York Insurance Law ("Insurance Law"), (i) establishing December 31, 2013 as the bar date ("Bar Date") for presentment of all claims other than claims for

administrative costs and expenses and (ii) providing for such other and further relief as this Court may deem just and proper;

AND, sufficient cause having been alleged therefore, and this Court having found the form and method of notice specified herein to be the best notice practicable, it is hereby

ORDERED, that notice of the Affirmation and this Order to Show Cause shall be substantially in the form attached as Exhibit A to the Affirmation and service shall be made by:

(i) posting on the Internet web page maintained by the Bureau at <http://www.nylb.org> at least 15 days before the Return Date; (ii) mailing same by United States first class mail to each of the following recipients: (a) Lancer Financial Group, Inc., 370 West Park Avenue, Long Beach, NY 11561; (b) Walther, Roark & Gay, PLC, Attorneys for Commonwealth of Kentucky Department of Workers' Claims and Kentucky Coal Employers' Self-Insurance Guaranty Fund (Jonathan L. Gay, of counsel), 163 East Main Street, Suite 200, P.O. Box 1598, Lexington, KY 40588-1598; (c) Hargraves McConnell & Costigan, P.C., Attorneys for Commonwealth of Kentucky Department of Workers' Claims and Kentucky Coal Employers' Self-Insurance Guaranty Fund (John McConnell, of counsel), The Helmsley Building, 230 Park Avenue, New York, NY 10169; (d) Frances M. McLaughlin, Esq., and Sharon Williams, Esq., Attorneys for the United States, United States Department of Justice, P.O. Box 875, Ben Franklin Station, Washington, DC 20044; (e) Ficara & Associates, P.C., Attorneys for Callon Petroleum, The Martin Family Charitable Trust and Logo Holdings, LLC (Donald J. Cayea, of counsel), 155 Pinelawn Road, Suite 240N, Melville, NY 11747; (f) Arnstein & Lehr, LLP, Attorneys for The Martin Family Charitable Trust (Mary Cannon Veed, of counsel), 120 South Riverside Plaza, Suite 120, Chicago, IL 60606; (g) Wharton Law Group, Attorneys for Logo Holdings, LLC (Margaret A. Wharton, of counsel), 456 South Central Avenue, P.O. Box 621172, Oviedo, FL 32762-1172; (h)

Chadbourne & Parke, LLP (Richard G. Liskov, of counsel), 30 Rockefeller Plaza, New York, NY 10011; (i) Morrison & Cohen LLP, Attorneys for Unit 82 Joint Venture (Y. David Scharf, of counsel), 909 Third Avenue, New York, NY 10022; (j) Patrick F. Adams, P.L.L.C., Attorneys for St. John the Baptist Diocesan High School (Gary A. Pagliarello, of counsel), 3500 Sunrise Highway, Building 300, Great River, NY 11739; (k) Laszlo Komjathy, Jr., Attorney IV, California Department of Insurance, 45 Fremont Street, 24th Floor, San Francisco, CA 94105; (l) Locke Lord, LLP, Attorneys for Frontier Insurance Company Coordinating Committee (Thomas W. Jenkins, of counsel), 111 South Wacker Drive, Chicago, IL 60606; and (m) Frontier's known creditors with allowed or unadjudicated claims (to the extent not included in (a) through (l) above); and (iii) publication in *Business Insurance*, or a publication of similar circulation, such publication to occur in two consecutive publications commencing within 15 days following entry of this Order to Show Cause; and it is further

ORDERED, that the form and methods of service of notice specified herein are hereby approved as in accordance with the law and as the best notice practicable and shall therefore constitute due and sufficient notice of this Order to Show Cause and scheduled Return Date herein and the Affirmation and the relief sought therein to all persons and entities entitled to receive such notice; and it is further

ORDERED, that the approved form of notice shall direct that all answering papers and supporting documentation ("Answering Papers") be served on the Superintendent so as to be received at least 14 days prior to the Return Date, and that service on the Superintendent shall be made by first class mail at the following address:

Superintendent of Financial Services of the State of New York as
Liquidator of Frontier Insurance Company
110 William Street
New York, New York 10038

Attention: John Pearson Kelly
General Counsel

and by submitting copies of the Answering Papers, with affidavit of service on the Superintendent as above, to this Court at the Courthouse located at 16 Eagle Street, in the County and City of Albany, State of New York, 14 days before the Return Date; and it is further

ORDERED, that in the absence of Answering Papers filed pursuant to the previous paragraph on or prior to the date specified, the Court may enter relief without hearing and no party shall be entitled to be heard thereon; and it is further

ORDERED, that any person or entity that fails to serve Answering Papers as provided herein shall be deemed to have waived any objections to the relief sought in the Affirmation and shall be barred from raising objections in this or any other proceeding concerning the matters set forth herein; and it is further

ORDERED, that any person or entity that has served Answering Papers as provided herein shall be deemed to have waived any objections that are not set forth in the Answering Papers.

ENTER:



J.S.C.

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