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At IAS Part 15 of the Supreme Court of the State of New York, County of Albany, at the courthouse, 16 Eagle Street, Albany, New York, on the 4th day of January, 2024.

P R E S E N T :

HON. RICHARD PLATKIN, J. S. C.

-----X
In the Matter of

Index No.: 97/06

the Liquidation of

ORDER TO SHOW CAUSE

FRONTIER INSURANCE COMPANY.
-----X

Upon the December 21, 2023, affirmation of Holly Sutton (“Sutton Aff.”), an attorney with the New York Liquidation Bureau (“NYLB”), which serves as the staff for Adrienne A. Harris, Superintendent of the Department of Financial Services of the State of New York, in her capacity as liquidator (“Liquidator”) of Frontier Insurance Company (“Frontier”), for an order, *inter alia*, approving the Liquidator’s report on the status of, and request to close, Frontier’s liquidation proceeding (“Closing Report”), and the financial transactions detailed therein, and upon all other papers previously submitted and all proceedings heretofore had herein;

NOW, on motion of Stephanie Blattmachr, attorney for the Liquidator, and after due deliberation having been had thereon;

LET all policyholders, creditors, claimants and others interested in the affairs of Frontier or counsel appear and show cause before this Court at the Courthouse located at 16 Eagle Street, Albany, New York, via videoconference (Microsoft Teams), on the 7th day of March, 2024 at 11 o’clock a.m. (“Return Date”), or as soon thereafter as counsel can be heard, why an order substantially in the form of the proposed order attached as Exhibit 1 to the Sutton Aff. should not be made, pursuant to Article 74 of the New York Insurance

Law (“Insurance Law”), (i) approving the Closing Report and the financial transactions detailed therein, annexed as Exhibit 2 to the Sutton Aff.; (ii) allowing the claim of the Pennsylvania Workers’ Compensation Security Fund in the amount of \$6,555,090.59, submitted to this Court on December 5, 2023, with an accompanying proposed order identified as Order No. 386; (iii) authorizing the continued payment of actual and necessary administrative expenses incurred by the Liquidator in the administration of the Frontier liquidation proceeding, including such expenses pertaining to the closing of the liquidation proceeding; (iv) authorizing the Liquidator to distribute Frontier’s assets, consistent with the priorities set forth in Insurance Law § 7434, to the former policyholders and creditors of Frontier with allowed claims; (v) terminating and closing the liquidation proceeding; (vi) authorizing the Liquidator to receive and disburse, without further application to this Court, any receipts that are received after the termination of the liquidation proceeding; (vii) authorizing the Liquidator, after termination of the liquidation proceeding and without further order of this Court, to destroy or otherwise dispose of any and all of the books, files, records (paper or electronic) and other property of the Frontier estate; (viii) releasing and discharging the Liquidator, her predecessors and successors in office, and their agents, attorneys and employees, including the NYLB, from any and all liability arising from their acts or omissions in connection with the liquidation proceeding; and (ix) for such other and further relief that this Court deems just and proper;

AND, sufficient cause having been alleged therefor, and this Court having found the form and method of service of notice specified herein to be reasonable and appropriate under the circumstances, it is hereby

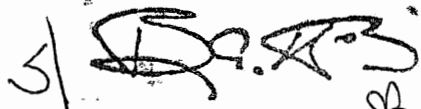
ORDERED, that the Liquidator shall provide notice of this application by: (i) posting the Order to Show Cause and its supporting papers on the NYLB Internet web page at <https://www.nylb.org>, under Legal and Estate Notices within five (5) days following the Liquidator's receipt of a signed copy of the Order to Show Cause; (ii) mailing same by United States First-Class Mail to each of the recipients listed on Schedule A and Schedule B, annexed hereto, within ten (10) days following the Liquidator's receipt of a signed copy of the Order to Show Cause; and it is further

ORDERED, that answering papers, either in support of or opposition to the relief sought herein (the "Answering Papers"), shall be served on the Liquidator via email to legal@nylb.org so as to be received at least seven (7) days before the Return Date, and that any Answering Papers, together with an affidavit of service, shall be filed with the Court on or before the Return Date; and it is further

ORDERED, that the Liquidator may request that its appearance be excused and that this matter be taken on submission only in the event there is no opposition to this Order to Show Cause.

ENTER:


J.S.C. 1/4/24

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\$ 1.0424

Schedule A

Entities that were served with the Initial Court Report, which includes the entities that submitted answering papers at the inception of the liquidation proceeding, and their current addresses.

1. John A. Petrilli, Esq.
Senior Vice President and General Counsel
Lancer Financial Group, Inc.
370 West Park Avenue
Long Beach, NY 11561
2. Jonathan L. Gay, Esq.
Walther, Roark & Gay, PLC
163 East Main Street, Suite 200
P.O. Box 1598
Lexington, KY 40588-1598
*Attorneys for Commonwealth of Kentucky
Department of Workers' Claims and Kentucky Coal
Employers' Self-Insurance Guaranty Fund*
3. Mark Kook, Esq.
Law Office of Mark R. Kook
1180 Avenue of the Americas, 8th Floor
New York, NY 10036
*Attorneys for Callon Petroleum, The Martin Family
Charitable Trust and Logo Holdings, LLC*
4. Frances M. McLaughlin, Esq.
United States Department of Justice
P.O. Box 875
Ben Franklin Station
Washington, D.C. 20044
5. Sharon Williams, Esq.
United States Department of Justice
P.O. Box 875
Ben Franklin Station
Washington, D.C. 20044
6. Logo Holdings, LLC
c/o Joseph F. Scognamiglio
131 Roses Grove Road
Southampton, NY 11968

7. Margaret A. Wharton, Esq.
Wharton Law Group
456 South Central Avenue
P.O. Box 621172
Oviedo, FL 32762-1172
Attorneys for The Martin Family Charitable Trust

8. Richard G. Liskov, Esq.
Arentfox Schiff LLP
1301 Avenue of the Americas, Floor 42
New York, NY 10019-6040

9. Y. David Scharf, Esq.
Morrison & Cohen LLP
909 Third Avenue
New York, NY 10022
Attorneys for Unit 82 Joint Venture

10. Gary A. Pagliarello, Esq.
Patrick F. Adams, P.L.L.C.
3500 Sunrise Highway, Building 300
Great River, NY 11739
Attorneys for St. John the Baptist Diocesan High School

11. Laszlo Komjathy, Jr., Esq.
California Department of Insurance
1901 Harrison Street
6th Floor
Oakland, CA 94612

12. Thomas W. Jenkins, Esq.
Locke Lord, LLP,
111 South Wacker Drive
Chicago, IL 60606
*Attorneys for Frontier Insurance Company
Coordinating Committee*

Schedule B

Claimants with allowed Class Two claims that are not covered by a security fund or guaranty association. There are seventy-nine non-fund, allowed Class Two claims held by thirty-seven claimants; some claimants have more than one such claim.

1. A Child's Dream, Inc.
c/o James A. Maass
26732 Cadiz Circle
Mission Viejo, CA 92691
2. Alexander Termite & Pest Control Company, Inc.
P.O. Box 47490
Doraville, GA 30362
3. Allan R. Brewer-Carias
20 East, 68th St. Apt 7E
New York, NY 10065
4. Angel Bernardo Viso
c/o Law Offices of Field Lomenza, P.C.
260 Madison Avenue, 22nd Floor
New York, NY 10016
Attn: David Field
5. Bank of America N.A.,
as Successor to Fleet Bank, N.A.
Special Assets Group Business Banking/CDG
99 Founder's Plaza, CT2-547-05-22
East Hartford, CT 06108
Attn: Nanette C. Franco, SVP & Market Manager
6. Bethany Rastok
11567 Decatur Street, #B
Westminster, CO 80234
7. Carmen Cecilia Lopez Lugo
c/o Law Offices of Field Lomenza, P.C.
260 Madison Avenue, 22nd Floor
New York, NY 10016
Attn: David Field
8. City of Westminster
Office of the City Attorney
4800 W. 92nd Avenue
Westminster, CO 80031

9. Clark County Office of the District Attorney
500 S. Grand Central Parkway
P.O. Box 552215
Las Vegas, NV 89155-2215
Re: Bond # SD00066876
Attn: Laura C. Rehfeldt

10. Debra Cripe
4644 Sunsail Circle
Destin, FL 32541

11. Dr. Carlos J. Estrada Gutierrez
c/o Manuel Porro - Vizcarra Law Offices
382 Escorial Avenue
Urb Caparra Heights
San Juan, PR 00920

12. Equity Trust Company FBO Liquidity Solutions, Inc.
401k David Fishel Trustee
1 Equity Way
Westlake, OH 44145

13. Estate of Thomas R. Spencer, Curtis Spencer,
Cameron M. Evans c/o Curtis M. Spencer
as Personal Representative of the Estate of Thomas R. Spencer
732 Mattison Avenue
Sumter, SC 29150

14. Estes Express Lines
1504 Appalachee Street
Birmingham, AL 35234-1422
Attn: Ryan Barrier, Manager

15. First State Bank of Eldorado
c/o Mr. Casey Heitz
Parker Heitz & Cosgrove PLLC
401 N. 31st Street, Suite 805
Billings, MT 59103-7212

16. Friendship House Children's Center
c/o Tom MacNeely, Esq.
Rosenn, Jenkins & Greenwald, LLP
1065 Highway 315, Suite 200
Wilkes-Barre, PA 18702

17. Gary Ray Parker and Professionals Real Estate Office, Inc.
c/o Boackle Law Firm, PLLC
700 Avignon Drive, Suite C
Ridgeland, MS 39157-5159
18. Illinois Environmental Protection Agency
c/o Mr. Christopher Grant
Asst. Atty. General Environmental Bureau
69 West Washington Street, Suite 1800
Chicago, IL 60602
19. Judy B. Hayman Homes Inc.
4693 Main Street Powell
Fyffe, AL 35971-5143
20. Labor Cabinet, Department of Workers' Claims
Attn: Workers' Claims Legal Division
657 Chamberlin Avenue
Frankfort, KY 40601
21. Liquidity Solutions, Inc.,
as Assignee of John Randy Danielson
1 University Plaza, Suite 508
Hackensack, NJ 07601
Attn: Jonathan Owens
22. Logo Holdings, LLC
c/o Joseph F. Scognamiglio
131 Roses Grove Road
Southampton, NY 11968
23. Madison County Alabama
100 Northside Square, Suite 700
Huntsville, AL 35801-4820
Attn: Jeff Rich, County Attorney
24. Ms. Charon Hare, as the Personal Representative
in the Estate of Marcel D. Hare, Deceased
7653 Dacosta
Redford, MI 48239
25. Robert Charles Enterprises, Inc.
300 Harmon Meadow Boulevard
Secaucus, NJ 07094

26. Russ Hill
c/o Dentons US LLP
1221 Avenue of the Americas
New York, NY 10020
27. Sharena Payne
c/o Preston J. Fields, PA
11211 Prosperityn Farms Road, C3011
Palm Beach Gardens, FL 33410
28. Stark County Dept. of Job & Family Services
c/o Ross A. Rhodes, Chief of the Civil Division
Stark County Office Bldg.
110 Central Plaza South, Suite 510
Canton, OH 44702
29. Stephanie Lucero
1728 E. 83rd Drive
Denver, CO 80229
30. The Martin Family Charitable Trust
as Assignee for Florida Desk Inc.
c/o Wharton Law Group, Attorneys
456 South Central Avenue
P.O. Box 621172
Oviedo, FL 32762-1172
31. The Village of Cary
c/o Laffan & Laffan, LLP
259 Mineola Boulevard
Mineola, NY 11501-2371
Attn: Maura V. Laffan
32. Town of Sutton
Sutton Town Hall
4 Uxbridge Road
Sutton, MA 01590
Attn: Robert S. Largess, Jr., Planning Board & Dept.
33. U.S. Customs Service
c/o Ms. Sharon C. Williams, Trial Attorney
Department of Justice
1100 L Street NW, Room 10016
Washington, DC 20005

34. U.S. Department of Justice
Department of Homeland Security,
Immigration & Customs
c/o Ms. Frances McLaughlin, Trial Attorney
1100 L Street, NW, Room 10020
Washington, DC 20005
35. William Abbott & Warren Woo
d/b/a Abbott & Woo PLC
4790 Geary Blvd.
San Francisco, CA 94118-2909
36. Williamson Industries Inc.
c/o George M. Snellings, Esq.
Zentner, Sartor & Snellings LLP
1507 Royal Avenue
P.O. Box 14420
Monroe, LA 71207-4420
37. Zurich American Insurance Company
c/o Ms. Karen Lee Turner
Eckert Seamans Cherin & Mellott, LLC
Two Liberty Place
50 South 16th Street, 22nd Floor
Philadelphia, PA 19102