

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 1st day of August, 2023.

P R E S E N T :

HON. RICHARD PLATKIN, J. S. C.

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In the Matter of

Index No.: 97/06

the Liquidation of

**ORDER TO SHOW CAUSE**

FRONTIER INSURANCE COMPANY.  
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Upon the July 27, 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 interim report on the status of Frontier’s liquidation proceeding (“Interim 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 29<sup>th</sup> day of September, 2023 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

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Combined Courts

Insurance Law (“Insurance Law”), (i) approving the Interim Report and the financial transactions detailed therein, annexed as Exhibit “2” to the Sutton Aff; (ii) authorizing the continued payment of actual and necessary administrative expenses incurred by the Liquidator in the administration of the Frontier liquidation proceeding; and (iii) providing for such other and further relief deemed just and proper by this Court;

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](mailto: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.

E N T E R:



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J.S.C.

## 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 addresses of record.

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 Offices of Mark Kook  
270 Madison Avenue, Suite 1203  
New York, NY 10016  
*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. Mary Cannon Veed, Esq.  
Amstein & Lehr, LLP,  
120 South Riverside Plaza, Suite 120  
Chicago, IL 60606  
*Attorneys for Logo Holdings, LLC*

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.  
Holland & Knight LLP  
30 Rockefeller Plaza  
New York, NY 10011
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  
45 Fremont Street, 24th Floor  
San Francisco, CA 94105
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  
Carius & Baumeister & Brewer  
c/o Kaye Scholer, LLP  
425 Park Avenue  
New York, NY 10022-3598  
Attn: Andrew K. Solow
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  
15 South Franklin Street  
Wilkes-Barre, PA 18711-0075
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  
221 Mineola Boulevard  
Mineola, NY 11501  
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  
110 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