

**FILED**  
SEP 06 2018  
NEW YORK  
COUNTY CLERK'S OFFICE

At IAS Part 12 of the Supreme Court of the State of New York, County of New York, at the courthouse at 60 Centre Street, in the County, City and State of New York, on the 12 day of September 2018.

P R E S E N T:

HONORABLE BARBARA JAFFE  
JUSTICE, SUPREME COURT

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK  
-----x

**EX PARTE MOTION OFFICE**

**APPROVED  
FOR THE PAYMENT  
OF MOTION FEE  
ONLY**

In the Matter of

Index No.: 402670/03

the Ancillary Receivership of

**ORDER TO SHOW CAUSE**

LEGION INSURANCE COMPANY.  
-----x

MS# 017 : OTHER

Based on the September 5, 2018 affirmation of Melissa A. Pisapia, an attorney with the New York Liquidation Bureau (the "NYLB"), the organization that serves as the staff for Maria T. Vullo, Superintendent of Financial Services of the State of New York in her capacity as ancillary receiver (the "Ancillary Receiver") of Legion Insurance Company ("Legion"), and upon all other papers previously submitted and all proceedings heretofore had herein;

NOW, on motion of the Ancillary Receiver, and after due deliberation having been had thereon;

LET all policyholders, claimants, creditors and others interested in the affairs of Legion or their counsel show cause before this Court at IAS Part 12, Room 341, thereof, at the Courthouse located at 60 Centre Street in the City, County and State of New York, on the 7th day of November 2018 (the "Return Date") at 9:30 o'clock in the A.m., or as soon thereafter as counsel can be heard, why an order should not be made, pursuant to Article 74 of

**N O F F E E**

the New York Insurance Law: (1) approving the Ancillary Receiver's report on the status of and request to close the Legion ancillary receivership proceeding (the "Ancillary Receivership Proceeding") and the financial transactions delineated in such report; (2) authorizing the continued payment of administrative expenses, if any, including expenses for the closing of the Ancillary Receivership Proceeding; (3) authorizing the NYLB to receive and disburse to the New York Property/Casualty Insurance Security Fund, New York Public Motor Vehicle Liability Security Fund and New York Workers' Compensation Security Fund (collectively, the "Security Funds") any future distributions in connection with the Ancillary Receivership Proceeding to pay amounts owed to the Security Funds without further application to this Court; (4) terminating and closing this Ancillary Receivership Proceeding; (5) releasing and discharging the Ancillary Receiver, her predecessors and successors in office, and their agents, attorneys and employees, from any and all liability arising from their acts or omissions in connection with the Ancillary Receivership Proceeding; and (6) granting such other and further relief as may be just and proper.

AND, sufficient cause having been alleged, it is hereby

ORDERED, that service of a copy of this Order to Show Cause and its supporting papers be made on the Insurance Commissioner of the Commonwealth of Pennsylvania as Statutory Liquidator of Legion, by serving a copy thereof by overnight delivery upon the Office of Liquidations, Rehabilitations and Special Funds, Capital Associates Building 901 North 7th Street, Harrisburg, PA 17102, on or before the 5th day of October 2018; and such service shall be deemed good and sufficient service; and it is further

ORDERED, that the Ancillary Receiver shall also give notice of this application to all policyholders, creditors and persons or entities by posting this Order to Show Cause and its supporting papers on the Internet web page maintained by the NYLB at <http://www.nylb.org> at

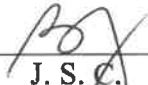
least fifteen (15) days before the Return Date with such posting to be deemed good and sufficient service; and it is further

ORDERED, that answering papers, either in support of or opposition to the relief sought herein (the "Answering Papers"), shall be served on the Ancillary Receiver at the following address:

Superintendent of Financial Services of the State of New York  
as Ancillary Receiver of Legion Insurance Company  
180 Maiden Lane, 14<sup>th</sup> Floor  
New York, New York 10038  
Attention: General Counsel

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 <sup>5 days by</sup> ~~or~~ before the Return Date.

ENTER

  
\_\_\_\_\_  
J. S. C.

**BARBARA JAFFE**  
J.S.C.

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

-----x

In the Matter of

Index No.: 402670/03  
(Jaffe, B.)

the Ancillary Receivership of

LEGION INSURANCE COMPANY.

**AFFIRMATION**

-----x

Melissa A. Pisapia, an attorney at law, duly admitted to practice before the Courts of the State of New York, hereby affirms the following to be true under penalties of perjury:

1. I am an attorney with the New York Liquidation Bureau (the “NYLB”), the organization that serves as the staff for Maria T. Vullo, Superintendent of Financial Services of the State of New York in her capacity as ancillary receiver (the “Superintendent” or “Ancillary Receiver”) of Legion Insurance Company (“Legion”), and submit this affirmation, upon information and belief, based on my review of the Legion files maintained by the NYLB and the conversations I have had with employees of the Ancillary Receiver, in support of the Ancillary Receiver’s application to approve the report on the status of and request to close the ancillary receivership proceeding of Legion (the “Closing Report”) annexed hereto as Exhibit “A”.

2. On July 28, 2003, by order of the Commonwealth Court of Pennsylvania (the “Pennsylvania Court”), Legion, organized under the laws of the Commonwealth of Pennsylvania and licensed to underwrite insurance policies in the State of New York, was placed into liquidation in the Commonwealth of Pennsylvania (the “Domestic Liquidation Proceeding”) and the Insurance Commissioner of the Commonwealth of Pennsylvania was appointed as Statutory Liquidator of Legion (the “Domestic Receiver”).

3. By order entered August 22, 2003 (the “Ancillary Order”), this Court placed Legion into ancillary receivership (the “Ancillary Receivership Proceeding”) and appointed the then-Superintendent of Insurance of the State of New York and his successors in office as Ancillary Receiver of Legion, thereby commencing this Ancillary Receivership Proceeding. The Superintendent has succeeded the Superintendent of Insurance as Ancillary Receiver of Legion.

4. The Ancillary Receivership Proceeding was commenced to permit the payment of eligible claims covered by the New York Property/Casualty Insurance Security Fund (the “P/C Fund”), the New York Public Motor Vehicle Liability Security Fund (“PMV Fund”) and the New York Workers’ Compensation Security Fund (the “WC Fund”) (collectively the “Security Funds”) remaining unpaid by Legion due to insolvency.

5. Following the placement of Legion into liquidation, all claims by Legion’s policyholders, claimants and creditors were processed by the Domestic Receiver. The Domestic Receiver assigned a claim number and referred those claims involving a New York-based policy to the Ancillary Receiver in order for covered claims to be paid by the Security Funds.

6. The Pennsylvania Court entered an order on April 29, 2015, establishing July 28, 2015 as the last date upon which any and all claims against Legion must be filed with the Domestic Receiver (the “Claims Bar Date”). The Claims Bar Date was made effective in the Ancillary Receivership Proceeding by Court order entered on June 18, 2015.

7. Because the Claims Bar Date of July 28, 2015 has passed, no further claims under Legion policies will be accepted by the Domestic Receiver and no additional claims will be presented to the Ancillary Receiver.

8. The Security Funds have now completed the handling of all eligible claims. Eligible claims of the P/C Fund and PMV Fund have been administered and paid by the P/C Fund and PMV Fund, respectively, as “allowed” claims in accordance with New York Insurance Law §7602(g). Eligible workers’ compensation claims have been referred to the WC Fund, which has paid or is continuing to pay the claims. Determinations of the validity and amount of workers’ compensation claims are made by the New York Workers’ Compensation Board and no further action of the Ancillary Receiver or the Court is required.<sup>1</sup>

9. For the above reasons the Ancillary Receivership Proceeding may be terminated and the Ancillary Receiver requests that this Court enter an order, substantially in the form of the proposed order annexed hereto as Exhibit “C”, granting the relief sought herein.

10. The Ancillary Receiver also requests that this Court issue the accompanying Order to Show Cause setting a return date for a hearing on the Ancillary Receiver’s application to be held before the Court at least thirty (30) days after the date of issuance of the Order to Show Cause.

11. No previous application for the relief sought herein has been made to this or any other court or judge thereof.

WHEREFORE, it is respectfully requested that this Court enter an order:

- (1) approving the Closing Report and the financial transactions delineated in such report;
- (2) authorizing the continued payment of administrative expenses, if any, including expenses for the closing of the Ancillary Receivership Proceeding;
- (3) authorizing the NYLB to receive and disburse to the Security Funds any future distributions in connection with the Ancillary Receivership Proceeding to pay amounts owed to the Security Funds without further application to the Court;
- (4) terminating and closing the Ancillary Receivership Proceeding;


---

<sup>1</sup> The Security Funds are entitled to reimbursement, on a *pro rata* basis, from the Domestic Receiver for claims payments and expenses on eligible New York claims and each have a claim in the Domestic Liquidation Proceeding for such amounts.

(5) releasing and discharging the Ancillary Receiver, her predecessors and successors in office, and their agents, attorneys and employees, from any and all liability arising from their acts or omissions in connection with the Ancillary Receivership Proceeding; and

(6) granting such other and further relief as may be just and proper.

Dated: New York, New York  
September 5, 2018

  
\_\_\_\_\_  
Melissa A. Pisapia

# EXHIBIT A



**FINAL REPORT ON THE STATUS OF AND REQUEST TO CLOSE  
THE ANCILLARY RECEIVERSHIP PROCEEDING  
OF LEGION INSURANCE COMPANY**

Maria T. Vullo, Superintendent of Financial Services of the State of New York (the “Superintendent”) as ancillary receiver (the “Ancillary Receiver”) of Legion Insurance Company (“Legion”), submits this report (the “Closing Report”) on the status of the ancillary receivership proceeding (“Ancillary Receivership Proceeding”) and respectfully requests that the proceeding be closed.

**COMMENCEMENT OF DOMESTIC RECEIVERSHIP AND  
ANCILLARY RECEIVERSHIP**

On July 28, 2003, the Commonwealth Court of Pennsylvania (the “Pennsylvania Court”) found Legion was insolvent and entered an order placing Legion into liquidation (the “Domestic Liquidation Proceeding”), and appointing the Insurance Commissioner of the Commonwealth of Pennsylvania Statutory Liquidator of Legion (the “Domestic Receiver”). By an order of the Supreme Court of the State of New York, New York County (the “Court”), entered on August 22, 2003, Legion was placed into ancillary receivership in the State of New York and the Superintendent of Financial Services of the State of New York and her successors in office were appointed Ancillary Receiver of Legion.

The Ancillary Receivership Proceeding was commenced to permit the payment of eligible claims covered by the New York Property/Casualty Insurance Security Fund (the “P/C Fund”), the New York Public Motor Vehicle Liability Security Fund (“PMV Fund”) and the New York Workers’ Compensation Security Fund (the “WC Fund”) (collectively, the “Security Funds”). In this proceeding, all claims referred to the Ancillary Receiver were Security Fund covered claims. Such claims have been processed and either have been paid or are being paid by the Security Funds.

## **THE ANCILLARY RECEIVERSHIP PROCEEDING MAY BE TERMINATED**

The Domestic Receiver processed all claims by Legion's policyholders, claimants and creditors and referred those claims involving a New York-based policy to the Ancillary Receiver in order for the Security Funds to pay claims covered by the Security Funds.

The Pennsylvania Court entered an order on April 29, 2015, establishing July 28, 2015 as the last date upon which any and all claims against Legion must be filed with the Domestic Receiver (the "Claims Bar Date"). The Claims Bar Date was made effective in the Ancillary Receivership Proceeding by Court order entered on June 18, 2015.

Because the Claims Bar Date of July 28, 2015 has passed, no further claims under Legion policies will be accepted by the Domestic Receiver and no additional claims will be forwarded to the Security Funds. The Security Funds have now completed the handling of all eligible claims. Eligible claims of the P/C Fund and PMV Fund have been administered and paid by the P/C Fund and PMV Fund, respectively, as "allowed" claims in accordance with New York Insurance Law ("Insurance Law") §7602(g). Eligible workers' compensation claims have been referred to the WC Fund, which has paid or is continuing to pay the claims. Determinations of the validity and amount of workers' compensation claims are made by the New York Workers' Compensation Board and no further action of the Ancillary Receiver or the Court is required. In light of the foregoing, the Ancillary Receiver respectfully requests that the Ancillary Receivership Proceeding be closed.

## FINANCIAL REPORT

The Ancillary Receiver completed all activities related to the Ancillary Receivership Proceeding and has closed Legion's books as of June 30, 2018 (the "Closing Date"). Legion's Summary of loss adjustment expenses ("LAE"), Administrative Expenses and Distributions and Other Recoveries for the period between August 22, 2003 and the Closing Date is annexed hereto as Exhibit "A".

### 1. Cash Receipts and Disbursements

As of the Closing Date, the Security Funds' administrative expenses totaled \$39,073,803, as follows: \$22,387,360 was paid by the P/C Fund, \$4,943,649 was paid by the PMV Fund and \$11,742,794 was paid by the WC Fund. These expenses constitute the actual and necessary costs of administration incurred in connection with claims handling during the Ancillary Receivership Proceeding, including third-party administrators, salaries, rent, professional fees, and other general administrative expenses of the Ancillary Receiver and the Security Funds.

#### a. Security Fund Claim and Expense Disbursements

The Security Funds paid \$221,428,887 in covered claims and \$20,888,502 in LAE. The P/C Fund paid \$86,323,326 in claims that were allowed in this proceeding pursuant to Insurance Law Section 7602(g) for losses and unearned premium ("covered claims") and \$15,001,690 in LAE. The PMV Fund paid \$6,409,777 in covered claims and \$113,148 in LAE. The WC Fund paid \$128,695,784 in covered claims and \$5,773,664 in LAE. All claims covered by the P/C Fund<sup>1</sup> and PMV Fund have now been paid and claims covered by the WC Fund have either been paid or are continuing to be paid.

---

<sup>1</sup> Two P/C Fund covered claims remain unpaid; however the claims have been settled for \$25,000 or less and will be paid as a superintendent allowance not requiring court approval pursuant to Insurance Law §7602(g). *See also* §1 (c), *infra*.

**b. Early Access Receipts**

In March 2006, the Ancillary Receiver, the Domestic Receiver and the guaranty funds of other states triggered by the Domestic Liquidation Proceeding entered into a “refunding agreement”, wherein the Domestic Receiver would provide early access distributions to the Security Funds during the course of the Domestic Liquidation Proceeding in partial reimbursement of claims and expense payments made by the Security Funds. Under that agreement, the Security Funds have received distributions from the Domestic Receiver totaling \$199,535,601.

**c. Reserves**

As of the Closing Date, the NYLB carried reserves associated with two open P/C Fund covered claims in the total amount of \$62,007, of which \$42,000 is for losses, \$3,688 is for LAE and \$16,319 is for administrative expenses.

As of the Closing Date, the NYLB carried reserves associated with open workers’ compensation claims in the total amount of \$86,398,735, of which \$72,450,351 is for losses, \$5,263,198 is for LAE and \$8,685,186 is for administrative expenses. Workers’ compensation claims will continue to be paid by the WC Fund and require no further action by the Ancillary Receiver or the Court as claims paid by the WC Fund are approved by and subject to the continuing jurisdiction of the Workers’ Compensation Board.

**d. Reimbursement of the Security Funds by the Domestic Receiver**

Each security fund has filed a claim in the Domestic Liquidation Proceeding equal to its claims payments and expenses as well as for reserves on open claims. The P/C Fund submitted a claim in the amount of \$123,774,383, the PMV Fund in the amount of \$11,466,574 and the WC Fund in the amount of \$232,610,977.

As of the Closing Date, the Domestic Receiver made distributions to the Security Funds in the following amounts: \$91,008,169 to the P/C Fund, \$9,123,100 to the PMV Fund and \$99,404,332 to the WC Fund. In addition, salvage and subrogation recoveries totaled \$875,668 for the P/C Fund, \$11,980 for the PMV Fund and \$2,666,673 for the WC Fund. The P/C Fund also received \$68,594 in large deductible recoveries collected by the Domestic Receiver. Additionally, the WC Fund received \$8,015,618 in large deductible recoveries collected by the Domestic Receiver and \$18,505,573 from the New York Second Injury Special Fund on eligible Legion claims.

After crediting all recoveries, receipts and early access distributions, the Security Funds' remaining claims in the Domestic Liquidation Proceeding total \$31,821,952 for the P/C Fund, \$2,331,494 for the PMV Fund and \$104,087,375 for the WC Fund. Because the Domestic Liquidation Proceeding remains open additional distributions are expected and will be paid proportionately to the Security Funds.

### **RELIEF SOUGHT**

The Ancillary Receiver submits this Closing Report in order to provide information on the status of the Ancillary Receivership Proceeding and to request that it be closed. Based on this Closing Report and other materials submitted in this proceeding, the Ancillary Receiver respectfully requests that the Court issue an order:

1. approving the Closing Report and the financial transactions delineated therein;
2. authorizing the continued payment of administrative expenses, if any, including expenses for the closing of the Ancillary Receivership Proceeding;
3. authorizing the NYLB to receive and disburse to the Security Funds any future distributions in connection with the Ancillary Receivership Proceeding to pay amounts owed to the Security Funds without further application to this Court;
4. terminating and closing the Ancillary Receivership Proceeding;

5. releasing and discharging the Ancillary Receiver, her predecessors and successors in office, and their agents, attorneys and employees, from any and all liability arising from their acts or omissions in connection with the Ancillary Receivership Proceeding; and
6. granting such other and further relief as may be just and proper.

Dated: New York, New York  
September 6, 2018



---

David Axinn  
Special Deputy Superintendent and  
Agent of Maria T. Vullo, Superintendent of  
Financial Services of the State of New York  
as Ancillary Receiver of Legion Insurance  
Company

L24043

# EXHIBIT B

**NEW YORK LIQUIDATION BUREAU  
LEGION INSURANCE COMPANY  
NEW YORK SECURITY FUNDS  
Incurred Losses, Loss Adjustment Expenses  
and Administrative Expenses  
from Inception to June 30, 2018**

Description	Inception to June 30, 2018			
	Property and Casualty Security Fund	Public Motor Vehicle Security Fund	Workers Compensation Security Fund	Combined Total
<b>Disbursements:</b>				
Policyholder Claims	84,788,365	5,932,565	127,368,530	218,089,460
Unearned Premium Claims	1,534,961	477,212	1,327,254	3,339,427
Loss Adjustment Expenses	15,001,690	113,148	5,773,664	20,888,502
Administrative Expenses	22,387,360	4,943,649	11,742,794	39,073,803
<b>Total Disbursements</b>	<b>123,712,376</b>	<b>11,466,574</b>	<b>146,212,242</b>	<b>281,391,192</b>
<b>Reserves:</b>				
Policyholder Claims	42,000	-	72,450,351	72,492,351
Loss Adjustment Expenses	3,688	-	5,263,198	5,266,886
Administrative Expenses	16,319	-	8,685,186	8,701,505
<b>Total Reserves</b>	<b>62,007</b>	<b>-</b>	<b>86,398,735</b>	<b>86,460,742</b>
<b>Total Incurred: Disbursements and Reserves</b>	<b>123,774,383</b>	<b>11,466,574</b>	<b>232,610,977</b>	<b>367,851,934</b>
<b>Receipts and Recoveries:</b>				
Early Access Distributions	91,008,169	9,123,100	99,404,332	199,535,601
Large Deductible Distributions	68,594	-	7,947,024	8,015,618
Section 15.8 Reimbursements	-	-	18,505,573	18,505,573
Salvage and Subrogation	875,668	11,980	2,666,673	3,554,321
<b>Total Receipts and Recoveries</b>	<b>91,952,431</b>	<b>9,135,080</b>	<b>128,523,602</b>	<b>229,611,113</b>
<b>Net after Receipts and Recoveries</b>	<b>31,821,952</b>	<b>2,331,494</b>	<b>104,087,375</b>	<b>138,240,821</b>



**NEW YORK LIQUIDATION BUREAU  
LEGION INSURANCE COMPANY  
NEW YORK SECURITY FUNDS  
Paid Losses, Loss Adjustment Expenses  
and Administrative Expenses  
from Inception to June 30, 2018**

<b>Description</b>	<b>Property and Casualty Security Fund</b>	<b>Public Motor Vehicle Security Fund</b>	<b>Workers Compensation Security Fund</b>	<b>Combined Total</b>
Policyholder Claims	84,788,365	5,932,565	127,368,530	218,089,460
Unearned Premium Claims	1,534,961	477,212	1,327,254	3,339,427
Loss Adjustment Expenses (LAE)	15,001,690	113,148	5,773,664	20,888,502
<b>Total Claims and LAE</b>	<b>101,325,016</b>	<b>6,522,925</b>	<b>134,469,448</b>	<b>242,317,389</b>
Third Party Administrators	3,888,623	-	3,076,583	6,965,206
Large Deductible Collection Fees	1,336	-	198,776	200,112
Employee Salaries	10,113,724	2,683,135	4,596,658	17,393,517
Employee Relations and Welfare	4,294,787	1,096,462	1,983,368	7,374,617
Rent and Related Expenses	2,644,357	679,866	1,177,046	4,501,269
Professional Services	309,584	167,234	153,779	630,597
General and Administrative Expenses	731,233	200,969	345,397	1,277,599
Other Miscellaneous Expenses	403,716	115,983	211,187	730,886
<b>Total Administrative Expenses</b>	<b>22,387,360</b>	<b>4,943,649</b>	<b>11,742,794</b>	<b>39,073,803</b>
<b>Total Disbursements</b>	<b>123,712,376</b>	<b>11,466,574</b>	<b>146,212,242</b>	<b>281,391,192</b>
<b>Receipts and Recoveries:</b>				
Early Access Distributions	91,008,169	9,123,100	99,404,332	199,535,601
Large Deductible Distributions	68,594	-	7,947,024	8,015,618
Section 15.8 Reimbursements	-	-	18,505,573	18,505,573
Salvage, Subrogation Recoveries	875,668	11,980	2,666,673	3,554,321
<b>Total Receipts and Recoveries</b>	<b>91,952,431</b>	<b>9,135,080</b>	<b>128,523,602</b>	<b>229,611,113</b>

# EXHIBIT C

At IAS Part 12 of the Supreme Court of the State of New York, County of New York, at the courthouse at 60 Centre Street, in the County, City and State of New York, on the \_\_\_\_ day of \_\_\_\_\_, 2018.

P R E S E N T:

HONORABLE BARBARA JAFFE

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

-----x

In the Matter of  
the Liquidation of

Index No.: 402670/03

**ORDER**

LEGION INSURANCE COMPANY.

-----x

Upon the September 5, 2018 affirmation of Melissa A. Pisapia (“Pisapia Aff”), an attorney with the New York Liquidation Bureau (the “NYLB”), the organization that serves as the staff for Maria T. Vullo, Superintendent of Financial Services of the State of New York in her capacity as ancillary receiver (“Ancillary Receiver”) of Legion Insurance Company (“Legion”), for an order: (1) approving the Ancillary Receiver’s report attached as Exhibit “1” to the Pisapia Aff (“Closing Report”) and the financial transactions detailed therein; (2) authorizing the continued payment of administrative expenses, if any, including expenses for the closing of the ancillary receivership proceeding; (3) authorizing the NYLB to receive and disburse to the New York Property/Casualty Insurance Security Fund, New York Public Motor Vehicle Liability Security Fund and New York Workers’ Compensation Security Fund (collectively, “Security Funds”) any distributions from the Domestic Receiver in payment of amounts owed to the Security Funds without further application to the Court; (4) terminating and

closing the ancillary receivership proceeding; and (5) releasing and discharging the Ancillary Receiver, her predecessors and successors in office, and their agents, attorneys and employees, from any and all liability arising from their acts or omissions in connection with the ancillary receivership proceeding;

NOW, on motion of the Ancillary Receiver and after due deliberation having been had, it is

ORDERED, that the application is granted; and it is further

ORDERED, that the Closing Report and the financial transactions delineated therein is approved; and it is further

ORDERED, that the Ancillary Receiver is authorized to continue paying administrative expenses, if any, including expenses for the closing of the ancillary receivership proceeding; and it is further

ORDERED, that the ancillary receivership proceeding is terminated and closed; and it is further

ORDERED, that the NYLB is authorized to receive and disburse to the Security Funds any future distributions from the Commissioner of the Pennsylvania Insurance Department in her capacity as the “Statutory Liquidator” of Legion in payment of amounts owed to the Security Funds without further application to this Court; and it is further

ORDERED, that the Ancillary Receiver, her predecessors and successors in office, and their agents, attorneys and employees, are released and discharged from any and all liability arising from their acts or omissions in connection with the ancillary receivership proceeding.

E N T E R

---

J.S.C.

