

**IMPORTANT SPECIAL NOTICE REGARDING
FINAL DETERMINATION OF CLAIMS**

All Proofs of Claims (“POCs”) have received a Notice of Determination (“NOD”) from the Receiver. The Receiver is beginning the process of submitting the Receiver’s determinations to the Court for final determination that will set the class and value of all claims that were the subject of a POC.

The Receiver’s submissions will be made in six groups (Groups 1 through 6) – approximately one group every successive quarter. When all the groups are added together, each group averages approximately 500 claims. Each submission will consist of two filings with the Court: (1) the Receiver’s Motion for an Order to Show Cause Setting a Deadline for Claimants to Object to the Receiver’s Claim Recommendation Report; and (2) Receiver’s Claim Recommendation Report. Each Claim Recommendation Report will be identified by the group number. For example, the Claim Recommendation Report for the first group of claims will be identified in the submission as the “Receiver’s First Claim Recommendation Report”. Notice of these submissions will only be sent to the claimants for the POCs included in the applicable Claims Recommendation Report. When each submission is filed, the claimants that are included in that submission group and whose claims are identified in the submission will receive notice and an opportunity to consent or object to the class or valuation made by the Receiver in the NOD. If you submit an objection, the Court will determine the value and class of your claim after a hearing as provided in the Revised Plan for the Receiver’s Claim Recommendation Report and Final Determination of Claim by the Court.

Presently, the Receiver has made the first submission to the Court regarding the Receiver’s First Claim Recommendation Report (Group 1). If your POC is part of this first filing, you will receive a notice that your POC will be subject to a final determination and you may proceed according to the instructions contained in the Order to Show Cause provided in the filing. If you object, you will receive a subsequent Order scheduling a hearing date and providing additional instructions for the hearing of your objection.

It is anticipated that the schedule for the filings of Groups 2 through 6 will be on or about the following dates:

01/03/23	Group 2
04/03/23	Group 3
07/03/23	Group 4
10/02/23	Group 5
01/03/24	Group 6

PLEASE TAKE NOTICE THAT although a final Court determination fixes the class and value for the claim, because IICRRG is insolvent, the amount ultimately paid for that value will be in an amount equal to a *pro rata* share of the determined value. **EVEN IF YOUR CLAIM HAS A VALUE GREATER THAN ZERO, YOU WILL NOT RECEIVE THAT FULL VALUE. IICRRG is insolvent; there are not enough funds in the estate to pay all claims. The amount ultimately paid for each claim will be reduced by an equal percentage**

of the value for each class. This percentage will be applied to all claims in a class at the same time, after all claims have been considered. For example, if at the time of final distribution to claimants, the total liabilities of IICRRG, which include the values of the finally determined claims for that class, are 400% greater than the available assets for that class, the distribution that would be made would be in an amount equal to 25% of the Court's final determination of your claim value. Regardless, no claim will be paid until after all claim values in all classes have been finally determined by the Court through this process and upon later application to the Court by the Receiver for final distribution of IICRRG's assets and the closing of the IICRRG liquidation estate. **THIS MEANS THAT REGARDLESS OF YOUR GROUP, ALL MEMBERS OF A CLASS WILL RECEIVE THE SAME PRO RATA VALUE OF THEIR FINALLY DETERMINED CLAIMS AND WILL BE PAID AT THE SAME TIME.**

If you did not receive a Notice of Determination from the Receiver, or your address or contact information has changed, please notify the Receiver immediately of the new information by contacting the Receiver by first class mail to Indemnity Insurance Corp., RRG in Liquidation, c/o the Delaware Department of Insurance, Bureau of Rehabilitation and Liquidation, 1007 N. Orange Street, Suite 1010, Wilmington, Delaware, Attn: Estate Manager, or by sending an email to iicclaimsinfo@delrlb.com; or by calling 877-472-8360.