



IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

IN THE MATTER OF:)
) C.A. No. 8601-VCZ
INDEMNITY INSURANCE CORPORATION,)
RRG, IN LIQUIDATION)

**RECEIVER’S MOTION FOR AN ORDER TO SHOW
CAUSE TO SET A DEADLINE FOR CLAIMANTS TO OBJECT
TO THE RECEIVER’S FOURTH CLAIMS RECOMMENDATION
REPORT AND TO SET A CONTESTED HEARING DATE**

Petitioner, the Honorable Trinidad Navarro, Insurance Commissioner of the State of Delaware, in his capacity as the Receiver (“Receiver”) of Indemnity Insurance Corporation, RRG, in Liquidation (“IICRRG”), moves this Honorable Court to enter an Order to Show Cause to Set a Deadline for Claimants to Object to the Receiver’s Fourth Claims Recommendation Report and to Set a Contested Hearing Date, pursuant to 18 *Del. C.* § 5917(c) and the Plan for the Receiver’s Claim Recommendation Report and Final Determination of Claims By the Court, which was approved on August 17, 2020 [D.I. 811] and subsequently modified for clarity and efficiency [D.I. 896] and approved by the Court by letter dated October 6, 2022 [D.I. 896] (the “Claim Final Determination Plan”).¹

1. On December 20, 2021, the Receiver filed a Motion for an Order to Show Cause Setting a Deadline for Claimants to Object to the Receiver’s First

¹ A copy of the Claim Final Determination Plan is available for review at https://insurance.delaware.gov/divisions/rehab_bureau/rehab_bureau_iicrrg/.

Claims Recommendation Hearing Date and for an Order Setting a Contested Recommendation Hearing Date After Letter Notice from the Receiver [D.I. 876] (“First Claims Recommendation Motion”).

2. The Introduction to the First Claims Recommendation Motion explained the purpose of the Proof of Claims (POC) Process, the Receiver’s Notice of Determination (“NOD”) and the final determination of claims by the Court.

3. Further, the First Claims Recommendation Motion set forth the procedural history of the liquidation proceedings and the approval of the Claim Final Determination Plan and Service Plan.

4. The information stated in the Introduction to the First Claims Determination Motion and paragraphs 1 through 10 of the Background will not be repeated here nor in subsequent motions for the Court to make final determinations of claims.

5. Since the filing of the First Claims Recommendation Motion, an electronic filing system has been developed by the Court that promotes judicial efficiency and access to the Court by claimants with respect to final claims determinations made pursuant to 18 *Del. C.* § 5917(c) and the Claim Final Determination Plan.

6. The Claim Final Determination Plan sets forth the process by which the priority and value of the claims of policyholders, creditors, and other claimants are determined and confirmed. (Definitions ¶¶ 2, 10; Procedures ¶¶ 1, 2).

7. The Claim Final Determination Plan provides that the Receiver will make the initial determination of claims (the “Claims Recommendation”) and include them in a report filed with the Court concerning claims in which the POC/NOD process has become final (the “Report”). (Procedures ¶ 8; 18 *Del. C.* 1953 § 5917(c)).

8. Because of the volume of claims, the Receiver has divided the Claim Recommendations into six groups. Within each group there will be recommendations for multiple claims and the Report will specify the Receiver’s Claim Recommendation for each claim identified in the Report. This Motion pertains to Group 4.

9. The Claim Final Determination Plan provides for a procedure to allow a hearing for any claimant who desires to have the Court review the Receiver’s Claim Recommendation with respect to that claimant’s claim. (Procedures ¶ 17).

10. Objections that have been previously filed to an NOD will not be considered in compliance for purposes of meeting the Objection Deadline. (Procedures ¶¶ 12, 13). By way of illustration:

- a. If a claimant filed a previous objection to the Receiver’s NOD, the claimant must still file an objection to the Receiver’s Claim Recommendation that complies with the information requested in the OSC.
- b. If the claimant filed a previous objection to the Receiver’s NOD, and wishes to withdraw its objection, the claimant need do nothing.
- c. If the claimant did not file a previous objection, but the claimant now wishes to object to the Receiver’s Claim Recommendation, the Claimant must file an objection to the Receiver’s Claim Recommendation that complies with the information requested in the OSC.
- d. If the claimant has not filed a previous objection and does not object to the Receiver’s Claim Recommendation, the claimant need do nothing.

11. The Claim Final Determination Plan provides that untimely filed objections to the Receiver’s Claim Recommendation are deemed “uncontested” and subject to the procedure for the Uncontested Recommendation Hearing. (Procedures ¶ 10).

12. The Claim Final Determination Plan provides the following schedule for the Contested Recommendation Hearing:

- a. No later than twenty-one (21) days prior to the Contested Recommendation Hearing, Claimant(s) and interested party(ies), if any, shall make available to the Court, and the Receiver, complete copies of all documents that the Claimant(s) or interested party(ies) seek to rely upon in support of the objection(s);
- b. No later than fourteen (14) days prior to the Contested Recommendation Hearing, the Receiver shall make available to the Court, the Claimant(s) and interested party(ies), if any, a complete copy of the POC File together with the Notice of Determination Claim Review Summary for that Claim. The documents hereunder shall be considered admitted into evidence and part of the record of the Contested Recommendation Hearing

(Procedures ¶ 18).

13. The Court will schedule a hearing on objections to the Receiver's Fourth Claim Recommendations Report after which the Court will enter an order allowing, allowing in part, or disallowing the claim. (Procedures ¶ 19).

14. The Claim Final Determination Plan provides that after all claims have received a final determination and all general assets of the Estate are known and

liquidated, the Receiver shall, at a time within the discretion of the Receiver, file a petition with the Court for the final distribution of Estate assets and the closing of the IICRRG Estate. (Procedures ¶ 24).

15. Concurrent with filing this motion, the Receiver has filed his Fourth Report of Claims Recommendations (“Fourth Claim Recommendations Report” or “Fourth Report”). A true and correct copy of the Fourth Report is also attached hereto as Exhibit “A”.

16. The Fourth Report can be summarized as follows:

- a. The Fourth Claims Recommendations Report addresses four hundred and eighty-three (483) claims.
- b. Fifty-eight (58) of the claims are for the return of unearned premium. Ten (10) of them are connected claims.² For Eighteen (18) of them, the Receiver recommends a value of \$0. The Receiver recommends varying values for the other forty (40) claims in the aggregate amount of \$542,946.91.
- c. Four hundred twenty-five (425) claims are liability claims. Within these claims, there are eighty-nine (89) connected

² This occurs where more than one claim for a return of unearned premium is submitted against the same policy.

groups.³ The Receiver recommends varying values for the four hundred twenty-five (425) liability claims in varying amounts in the aggregate of \$48,067,022.80.⁴

17. The Priority Classes that are relevant to this motion are identified in the Fourth Claims Recommendation Report as follows:

- a. 18 *Del. C.* § 5918(e)(3) Class III – Claims of policy holders and injured persons against a policyholder (Liability Claims) or claims for return of unearned premiums (Unearned Premium Claims). The Receiver recommends that four hundred fifty-eight (458) of these claims be assigned Class III.
- b. 18 *Del. C.* § 5918(e)(7) Class VII – Claims which would otherwise qualify for one of the preceding classes (Class I through Class VI) but which was not filed with the receiver on

³ Claims that are within a connected group are claims that are related by a discrete event from which the claim arose (*i.e.*, claims arising from slip-and-fall at insured establishment bar on x date may have more than one POC. For example, in the slip-and-fall scenario, there may be separate POCs for the injured party, the insured establishment, and a law firm seeking attorney's fees after representing the insured). The Receiver recommends a value for only one claim within a connected group.

⁴ This amount includes \$6,837,125.00 for claims recommended as Class VII. It is not anticipated that sufficient funds will remain in the Estate after payments to Class III claimant to make any payments to Class VII claimants. Thus, unless the Court excuses the late filing, none of the claimants listed as Class VII is expected to receive a payment for their claim.

or before the bar date and which are not excused from such bar date by the liquidation court. The Fourth Claims Recommendation Report identifies twenty-five (25) liability claims that fall within Priority Class VII. For the reasons stated in the Fourth Claims Recommendation Report, which are incorporated herein by reference, the Receiver recommends that six (6) of these twenty-five (25) late-filed claims be excused and that the Court assign them to Priority Class III.

18. The reasons and basis for each of the Receiver's recommendations set forth in the Fourth Claims Recommendation Report are stated in the Notice of Determination Claim Review Summary associated with each claim which will be supplied to the Court for review and consideration in accordance with the Claim Final Determination Plan.

19. Additionally, POCs # 1023 & 2519 are claims referencing policies issued to the same insured, bearing policy numbers 5000173 & 6000112, respectively, on the attached Schedule 2. IICRRG's records indicate that in mid-2011, both policies were ostensibly cancelled back to the date of their inception "at the request of the insured." (POC 1023 initially referenced IICRRG policy #9000112, which was the "renewal" of policy #5000173 following the ostensible cancellation of the original policy in effect at the date of loss). Following review of

the mid-2011 transactions involving the supposed cancellation back to inception, the Receiver finds that the purpose of the cancellation of the policies was to improperly evade liability and the Receiver recommends that the cancellation be disregarded and that POCs # 1023 and 2519 be processed under policies #5000173 and #6000112, respectively, treated as effective as of the date of loss.

20. By Order dated August 17, 2020 (D.I. 811) this Court approved, along with the Claim Final Determination Plan, the Receiver's Plan Regarding Service of the Receiver's Public Court Filings Concerning the Proof of Claims Process (the "Service Plan").

21. The Receiver requests that the procedures in the Service Plan be used to notify claimants whose claims are the subject of the Receiver's Recommendations in the Fourth Claim Recommendations Report of the dates set by the Court for the Objection Deadline and Contested Recommendation Hearing, and to provide those claimants with copies of the OSC, this motion, and the Receiver's Fourth Claim Recommendations Report in the manner set forth in the Service Plan.

WHEREFORE, pursuant to the Claims Final Determination Plan and 4Order to Show Cause to Set a Deadline for Claimants to Object to the Receiver's Fourth Claims Recommendation Report and to Set a Contested Hearing Date.

Dated: July 14, 2023

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Word count: 1753



EXHIBIT A

IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

IN THE MATTER OF:)
) C.A. No. 8601-VCZ
INDEMNITY INSURANCE CORPORATION,)
RRG, IN LIQUIDATION)

**RECEIVER’S FOURTH REPORT OF CLAIMS RECOMMENDATIONS
PURSUANT TO PARAGRAPH 10 OF THE CLAIM FINAL
DETERMINATION PLAN**

Petitioner, the Honorable Trinidad Navarro, Insurance Commissioner of the State of Delaware, in his capacity as the Receiver (“Receiver”) of Indemnity Insurance Corporation, RRG, in Liquidation (“IICRRG”), presents to this Honorable Court the Receiver’s Fourth Report of Claims Recommendations (the “Fourth Claims Recommendation Report”) Pursuant to the Plan for the Receiver’s Claim Recommendation Report and Final Determination of Claim By The Court (the “Claim Final Determination Plan”).

I. Background

1. The Claim Final Determination Plan [D.I. 726, Ex. “A”] filed with the Court on September 10, 2019 and approved by the Court by Order of August 17, 2020 [D.I. 811] and subsequently modified for clarity and efficiency [D.I. 896] and approved by the Court by letter dated October 6, 2022 [D.I. 896] sets forth

the process by which the priority and value of Claims of policyholders, creditors, and other Claimants are determined and confirmed.

2. The Claim Final Determination Plan provides that, *inter alia*, the Receiver will file a report with the Court concerning Claims in which the Proof of Claim/Notice of Determination process has become final (the “Claim Recommendation Report”). This is the Receiver’s Fourth Claims Recommendation Report, which is comprised of multiple Claims and for each Claim identified, specifies the Receiver’s Claim Recommendation.

II. Receiver’s Fourth Report of Claims Recommendations Summary

3. Submitted in this Fourth Report are four hundred eighty-three (483) claims.

4. The Receiver recommends four hundred fifty-eight (458) of the Claims should be accorded Priority Class III, and twenty-five (25) of the Claims should be treated as Priority Class VII. As discussed below, the Receiver recommends that the late filing be excused for six (6) of the twenty-five (25) Class VII claims.

5. Priority Class III claims include:

Claims by policyholders, beneficiaries and insureds, including the federal or any state or local government if such government is a named policyholder, beneficiary or insured under the policy, arising from and within the coverage of and not in excess of the applicable limits of insurance policies, insurance contracts and funding agreements issued by the company; liability claims, including liability claims of the federal or any state or local

government, against insureds which claims are within the coverage of and not in excess of the applicable limits of insurance policies, insurance contracts and funding agreements issued by the company, including claims for reasonable attorneys' fees incurred by the policyholder to defend against the liability claim if such attorneys' fees are covered under the policy, but only to the extent covered; policyholder's claims for refunds of unearned premium;...provided, however, that this paragraph shall not apply to the following claims:

- a. Claims arising under reinsurance contracts, including any claims for reinsurance premium due;
- b. Claims of insurers, insurance pools or underwriting associations for contribution, indemnity or subrogation, equitable or otherwise.

18 *Del. C.* § 5918(e)(3).

6. Priority Class VII Claims include:

Claims which would otherwise qualify for classification under the classes enumerated above [*i.e.* in 18 *Del. C.* § 5918(e)(1) – (6)], but which are not filed with the receiver on or before the bar date and which are not excused from such bar date by the liquidation court.

7. The pertinent information for each claim, including the Receiver's Recommendation as to class and amount, are shown in the attached Schedules. Schedule "1" contains fifty-eight (58) claims for refund of unearned premium. Schedule "2" contains four hundred twenty-five (425) claims for liability from policyholders, beneficiaries, or insureds under policies with IICRRG. The

Schedules and the information contained therein, are discussed more fully in Section III, below.

8. The claims on Schedules 1 and 2 are subject to several caveats:
 - a. For Class III claims, “interest shall not be allowed or paid” other than for pre-liquidation judgments other than by default or collusion. 18 *Del. C.* § 5918(e)(3);
 - b. For Class III claims, all claims must be “within the coverage” of the insurance policy. 18 *Del. C.* § 5918(e)(3);
 - c. For Class III claims, all claims must be within the applicable policy limit (including any excess policy issued by IICRRG). 18 *Del. C.* § 5918(e)(3);
 - d. For each of the Class VII claims on Schedule 2¹, if the Court excuses the late filing, the Receiver’s recommendation is that they be assigned Class III; and
 - e. The Court cannot consider a post-liquidation judgment as evidence of either liability or damages. 18 *Del. C.* §5928(c).

III. Receiver’s Recommendations

A. Schedule 1 - Refund of Unearned Premium

9. Each of the fifty-eight (58) claims listed on Schedule 1 are claims for the refund of unearned premium. There are ten (10) connected claim groups.

10. Thus, the Receiver recommends that the Court determine that each of the claims listed on Schedule 1 are Class III claims, pursuant to 18 *Del. C.* §5918(e)(3).

¹ There are no Class VII claims on Schedule 1.

11. Each of the rows on Schedule 1 represents a single claim for unearned premium.

12. The columns in Schedule 1 provide the following information for each claim:

- a. Proof of Claim Number. This is the number assigned to the Proof of Claim (“POC”) by the Receiver.² It is communicated to the claimant through the Notice of Determination (“NOD”), as described below.
- b. Connected Claim Group. For Refund of Unearned Premium Claims, where separate entities have made a claim for return of the unearned premium under the same policy they are treated as a Connected Claim. The number in this column corresponds to one of the Proofs of Claim within the group of connected claims (*e.g.* the Connected Claim Group 1472 consists of POCs 0826 and 1472).
- c. Policy Number. This is the number assigned to the policy of insurance by IICRRG when the policy was issued.
- d. Amount Claimed on Proof of Claim Form. This is the amount which the claimant indicated was due to it on the POC form submitted by the claimant. Where blank, the claimant did not request a specific dollar amount.
- e. Receiver’s Recommended Priority Class. This is the priority class under 18 *Del. C.* § 5918(e) recommended by the Receiver.³
- f. Receiver’s Recommended Value. This is the value for the claim for return premium recommended by the Receiver.

² Certain POCs contained more than one claim. In that case, letters have been added after the POC Number to designate the individual claims contained on the POC form.

³ As discussed above, each of the claims on Schedule 1 are for the refund of unearned premium, and thus fall within Class III under the terms of 18 *Del. C.* § 5918(e)(3).

13. Of the fifty-eight (58) claims for refund of unearned premium on Schedule 1, for eighteen (18) of those claims the Receiver recommends a value of \$0. For the remaining forty (40), the Receiver recommends varying values, totaling \$542,946.91.

B. Claims for Liability From Policyholders, Beneficiaries, or Insureds Under Policies with IICRRG

14. Each of the four hundred twenty-five (425) claims listed on Schedule 2 states a claim for liability from policyholders, beneficiaries, or insureds under policies with IICRRG.

15. Twenty-five (25) of the claims listed on Schedule 2 were filed after the Bar Date, and thus would have a Priority Class of VII, pursuant to 18 *Del. C.* §5918(e)(3). Should the late filing of these claims be excused by the Court pursuant to § 5918(e)(3), they would be Class III claims.

16. The remaining four hundred (400) claims have a recommended Priority Class of III pursuant to §5918(e)(3).

17. For six of the claims referenced in paragraph 15 which were filed after the Bar Date (POC Nos. 2724, 2729, 2792, 2802, 2825, 2858),⁴ the Receiver after communications with the claimant, has determined that good cause existed for the late filing (*e.g.* the claimant was an injured party who had not received notice of the

⁴ These claims are highlighted in yellow on Schedule 2.

liquidation and bar date). For these claims, the Receiver recommends that the Court excuse the late filing of these claims pursuant to 18 *Del. C.* §5918(e)(7). For these six claims, the Receiver’s recommendation is in varying amounts in the aggregate of \$2,150,000.

18. For three of the claims referenced in paragraph 15 which were filed after the Bar Date (POCs 2769_C, 2847, and 2753) the late-filed claims were submitted by an insured, and in each case a claimant timely submitted a claim. In these cases, unless the Court excuses the late filing of the insured’s Proof of Claim upon objection, the insured will not receive any amount in distribution, and the claimants will receive (subject to offset by prior payment by the insured) the *pro-rata* distribution for the indemnity portion.

19. In order to facilitate the determination of claims subject to the applicable policy limits and sub-limits, Schedule 2 is organized by policy.

20. The first column contains information specific to the policy of insurance issued to a policyholder including:

- a. The Policy Number. The number assigned to the policy of insurance by IICRRG when the policy was issued. All claims for liability from policyholders, beneficiaries, or insureds under the policy listed in this column are included in this Fourth Report of Claims Recommendations.
- b. Limits. These are the limits of the insurance policy listed by the dollar amount of the limits of insurance by occurrence (“Occ”) and by aggregate (“Agg”). For example, a listing of “Limits (Occ/Agg): \$1M/\$2M” refers to policy limits of \$1,000,000 per each occurrence

and \$2,000,000 in aggregate.⁵ Some policies also have a limit by location (“Loc”), which is noted where applicable.

- c. Excess Limits. For some policies, there was also an additional policy providing for excess coverage. Where this is the case, the first column contains an entry stating “Excess Limits (Occ/Agg)” which then has numerical values similar to the listing of the policy’s general limits.
- d. Prior Payments. This is a dollar amount for claims paid pre-liquidation on that policy. It is used in computing the proper amount under the aggregate. (See footnote 5).

21. Each of the rows containing a Proof of Claim Number on Schedule 2 represents a single claim for liability from policyholders, beneficiaries, or insureds under policies with IICRRG. The columns in Schedule 2 provide the following information for each claim:

- a. Policy Info. This contains the information for each policy for which claims have been made in Schedule 2, as described in paragraph 15, above.
- b. Proof of Claim Number. This is the number assigned to the Proof of Claim (“POC”) by the Receiver.⁶
- c. Claimant Type. This is the type of claimant, listed as either an “Insured”, denoting an entity which was either a policyholder, an

⁵ “Aggregate” refers to a policy provision providing a limitation on total liability under each policy, such that once claims had been paid under a policy by IICRRG in an amount equaling the aggregate limit, no further payments would be due under the policy even if such claim were below the “occurrence” limit. In an operating insurance company, the aggregate is generally applied as paid on a “first-come-first-served” basis.

⁶ Certain POCs contained more than one claim. In that case, letters have been added after the POC Number to designate the individual claims contained on the POC form.

insured and/or an additional named insured under the applicable IICRRG policy, or as an “Injured Party,” being a third party under the policy who is claiming an injury.

- d. **Connected Claim Group.** For liability claims, Connected Claims are claims arising from the same occurrence. For this report, they generally consist of one or more injured party and one insured and/or policyholders (with or without a duplicate claim). Connected Claims are listed in consecutive rows and are shaded in the same grayscale. The number in this column corresponds to one of the Proofs of Claim within the group of connected claims (*e.g.* the first Connected Claim Group in Schedule 2 contained only an insured (POC 0720) and a duplicate of the insured (POC 0721) and did not contain an injured party, and the Connected Claim Group number is 0720 for both claims; the second Connected Claim Group consists of POCs 1852 (for the insured) and 1134 (for the injured party), and the Connected Claim Group number is 1852 for all of these claims).
- e. **Primary Policy Number.** The number assigned to the policy of insurance by IICRRG when the policy was issued.
- f. **Sub-Limit and Type (if applicable to claim & less than standard policy limits).** Under certain IICRRG policies of insurance, particular types of claims were subject to a separate “sub-limit” which is used in place of the general policy limits. This would apply generally to coverage for assault and battery, and/or to coverage for liquor liability. Where this is the case, for a particular claim, the amount of the sublimit is shown in the form of, for example (\$100K/\$1M) representing a \$100,000 per occurrence limit, and a \$1,000,000 aggregate limit for the applicable coverage, which is also shown. If there is no entry in this column for a claim, the claim is not subject to a sub-limit, and instead is governed by the policy limits set forth in the Policy Info set forth in column 1.
- g. **Amount Claimed on Proof of Claim Form.** This is the amount which the claimant indicated was due to it on the POC form submitted by the claimant. Where blank, the claimant did not request a specific dollar amount.

- h. Receiver's Recommended Priority Class. This is the priority class under 18 *Del. C.* § 5918(e) recommended by the Receiver.⁷
- i. Receiver's Recommended Value, Receiver's Recommended Defense Value, and Receiver's Recommended Total Value. These columns are the value for the claim for liability recommended by the Receiver. They are broken out into (1) Receiver's Recommended Indemnity Value, which is the value of claim asserted by a claimant, against an insured (with the payment to the insured or the claimant as discussed below); (2) Receiver's Recommended Defense Value, which is the value for the cost of defense incurred by the insured (not the claimant); and (3) Receiver's Recommended Total Value, which is the sum of the two prior values. As discussed below—for claims which are not Connected Claims, the recommendation is for that particular claimant. For claims which are Connected Claims, where there is an insured/policyholder who is a claimant, the recommended value is for the value of the indemnity claim and for the value of the cost of defense (if applicable). Actual payment of the *pro-rata* portion of the indemnity part of the claim is to be made to the insured/policyholder if it provides proof at the time of distribution that it made such payment to the injured party, otherwise it will be made directly to the injured party.
- j. NOD Summary File Part. This is a number for the use of the Court to locate the NOD Summary for a given claim.
- k. Asterisk – Certain limits and sub-limits of insurance show an asterisk (e.g. \$1M/\$2M*). The asterisk denotes that the indemnity payments under this limit or sub-limit is reduced by the costs paid for defense, sometimes referred to as being “inside limits.” For example, if \$100,000 in defense costs were paid on a claim for an injured party which was valued at \$1,000,000 (on a \$1,000,000 per occurrence “inside limits” policy), the claimant's value would be only \$900,000. If no asterisk is marked on a limit or sub-limit, the defense costs do not

⁷ As discussed above, each of the claims on Schedule 2 are claims for liability from policyholders, beneficiaries, or insureds under policies with IICRRG. With the exception of the twenty-five (25) late-filed claims these claims fall within Class III under the terms of 18 *Del. C.* § 5918(e)(3). The twenty-five (25) late-filed claims fall within Class VII, unless the late-filing is excused by the Court, in which case they would be Class III claims. 18 *Del. C.* § 5918(e)(3).

impact the limits of insurance for an injured party (*i.e.*, under the same scenario as above, the \$100,000 defense payment would not affect the limit for the injured party, and the injured party's value would be \$1,000,000).

22. For policies subject to an aggregate limit, at the time of distribution and to the extent applicable, the Receiver will apply the aggregate on a *pro-rata* basis.

23. By way of illustration, if there are four claimants awarded \$1,000,000 by the Court on a policy with an aggregate limit of \$2,000,000 and there has not been a prior payment under the policy term, the payment to each claimant would be based upon a value of \$500,000 (*i.e.* the recommended value (R) multiplied by the quotient of the aggregate (A) divided by the total of recommended values subject to aggregate (T) $(R \times (A/T))$).

24. In this Fourth Report of Claims Recommendation, based upon the Receiver's recommended value, no aggregate limit or sub-limit for any policy is exceeded. This could change should the Court place a value for one or more claims higher than the Receiver's recommended value.

25. Schedule 2 contains four hundred and twenty-five (425) claims for liability from policyholders, beneficiaries, or insureds under policies with IICRRG. There are eighty-nine (89) Connected Claim Groups.⁸

⁸ In certain Connected Claim Groups one or more insureds or injured parties may bear an additional label in the "Claimant Type" column of "Duplicate." This denotes that that POC # was a duplicate claim by the same insured or injured party

26. For Connected Claims Groups, where there is an insured/policyholder, that entity receives the recommendation, with the value generally reflecting a component for costs of defense, and a component for the indemnity claim to the injured party, as shown in the columns on Schedule “2.”

27. For four separate sets of connected claims in this Fourth Report of Claims Recommendation, there are multiple injured-person claimants (i.e. not policyholders) (Connected Claims Nos. 2561, 1385, 2157, & 1234). As such, allocation of the Receiver’s total indemnity claim among those claimants is necessary and is shown in the applicable NOD Summary.

a. For Connected Claim No. 2561, the Receiver recommends that the \$55,000 indemnity recommendation be allocated as follows:

POC 1359 - \$35,000

POC 1360 - \$20,000

b. For Connected Claim No. 1385, the Receiver recommends that the \$100,000 indemnity recommendation be allocated as follows:

POC 0285 - \$25,000

POC 0286 - \$75,000

relating to the same occurrence. Duplicate claims all have a recommended value of zero. The full value of the claim, if any, is placed on the non-duplicative POC(s).

c. For Connected Claim No. 2157, the Receiver recommends that the \$250,000 indemnity recommendation be allocated as follows:

POC 2157 - \$125,000

POC 2158 - \$125,000

d. For Connected Claim No. 1234, the Receiver recommends that the \$600,000 indemnity recommendation be allocated as follows:

POC 1234 - \$150,000

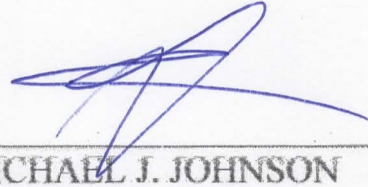
POC 1235 - \$450,000

28. Additionally, as set forth in greater detail in Paragraph 19 of the Motion filed contemporaneously with this Report, the Receiver recommends that the Court determines that coverage exists under policies #5000173 and #6000112 covering POCs # 1023 & 2519, respectively, despite records indicating that those policies had been cancelled by IICRRG.

29. If the insured/policyholder presents proof at the time of distribution that it has paid some or all of the indemnity portion of the claim amount as valued by the Court to the injured person, the insured/policyholder receives the *pro-rata* distribution for the indemnity portion that it paid, with the remainder of any partial payment being distributed to the injured party. Otherwise, the injured party receives the full *pro-rata* distribution for the indemnity portion.

30. For the four hundred and twenty-five (425) liability claims, the Receiver's recommendation is in varying amounts in the aggregate of ~~\$42,067,000.00~~⁹

Date: July 14, 2023



MICHAEL J. JOHNSON
Deputy Receiver of Indemnity
Insurance Corporation, RRG in
Liquidation

⁹ This amount includes \$6,837,125.00 for claims recommended as Class VII. It is not anticipated that sufficient funds will remain in the Estate after payments to Class III claimant to make any payments to lower priority claimants. Thus, unless the Court excuses the late filing, none of the claimants listed as Class VII, other than those listed in Paragraph 17, is expected to receive a payment for their claim.

SCHEDULE “1”

Indemnity Insurance Corporation, RRG in Liquidation
Receiver's Fourth Claim Recommendation Report
Schedule 1
Unearned Premium Claims

Proof of Claim Number	Connected Claims	Policy Number	Amount Claimed On Proof of Claim Form	Receiver's Recommended Priority Class	Receiver's Recommended Value
0452		6003404	21,390.99	3	4,661.38
1937		6003424	2,585.89	3	2,585.89
1186		6003428	45,528.92	3	0.00
1468		6003676	3,425.00	3	0.00
1468B		6003677		3	0.00
0826	1472	6003818	4,500.00	3	0.00
1472	1472	6003818	4,550.68	3	0.00
1894		6003854	9,308.69	3	9,308.69
1370		6003855		3	0.00
1371		6003856		3	0.00
1263		6003892	3,243.34	3	3,243.34
0395		6003907	38,759.15	3	38,759.15
0395B		6003908		3	2,205.48
1520		6004085	1,843.77	3	0.00
0854	1979	6004114	11,612.00	3	0.00
1979	1979	6004114	5,123.32	3	4,482.64
0854B	1979B	6004115		3	0.00
1979B	1979B	6004115		3	246.58
1184		6004124	3,805.48	3	3,805.48
1523		6004139	22,848.67	3	1,844.93
1523B		6004140		3	106.85
1218		6004141	10,821.69	3	1,949.87
1893		6004160	33,482.53	3	33,482.53
1940		6004234	5,899.54	3	5,899.54
1900		6004235	21,379.83	3	21,199.89
1953		6004239	114,385.00	3	114,385.00
1954		6004240	34,167.00	3	34,167.00
1989		6004266	6,921.03	3	6,921.03
1990		6004267	608.22	3	608.22
0107		6004280	15,342.95	3	15,342.95
1217		6004294	10,928.91	3	10,928.91
1369		6004295		3	3,162.27
1992		6004313	47,693.30	3	47,693.30
1991		6004314	9,452.05	3	9,452.05
0443		6004320	14,994.00	3	13,365.07
1244		6004330	31,696.19	3	31,696.19
1948		6004331	4,984.11	3	4,984.11
0735	0116	6004357		3	0.00

Proof of Claim Number	Connected Claims	Policy Number	Amount Claimed On Proof of Claim Form	Receiver's Recommended Priority Class	Receiver's Recommended Value
0116	0116	6004357	14,038.96	3	12,508.44
0734	0116B	6004358		3	0.00
0116B	0116B	6004358		3	3,090.41
1942	0121	6004370	26,557.14	3	26,557.14
0121	0121	6004370	44,226.00	3	0.00
1260	1260	6004403	5,401.07	3	5,401.07
0047	1260	6004403	20,389.39	3	0.00
1486		6004409	11,149.82	3	11,149.82
1486B		6004410		3	9,088.77
1247	1247	6004429	18,437.28	3	18,437.28
1248	1247	6004429	18,437.28	3	0.00
1247B	1247B	6004430		3	2,282.19
1248B	1247B	6004430		3	0.00
2225	0760	6004451	18,180.00	3	0.00
0760	0760	6004451	4,689.10	3	4,689.10
1915		6004456	87.00	3	87.00
1914		6004457	7.56	3	7.56
1245		6004476	21,417.33	3	21,417.33
1246		6004477	21,417.33	3	1,742.47
0117			1,241.32	3	0.00

Grand Total

\$766,958.83

\$542,946.91

SCHEDULE “2”

**Indemnity Insurance Corporation, RRG in Liquidation
Receiver's Fourth Claim Recommendation Report
Schedule 2
Liability Claims - Grouped by Policy Number**

Policy Information	Proof of Claim Number	Claimant Type	Connected Claims	Primary Policy Number	Sub-Limit & Type (If applicable to claim & less than standard policy limits)	Amount Claimed On Proof of Claim Form	Receiver's Recommended Priority Class	Receiver's Recommended Indemnity Value	Receiver's Recommended Defense Value	Receiver's Recommended Total Value	NOD Summary File Part
Policy No: 3003266 Limits (Occ/Agg): \$1M/\$2M Excess Limits (Occ/Agg): \$2M/\$2M Liq. Liab. Excluded Prior Payments \$201,971.50	2855	Injured Party		3003266	\$1M/\$1M Liquor Liability	4,000,000.00	3	0.00		0.00	
				3003266 Total				0.00	0.00	0.00	1
Policy No: 3003475 Limits (Occ/Agg): \$1M/\$2M Prior Payments \$71,225.87	0155	Insured		3003475	\$50K/\$50K* Assault and Battery	334,151.84	3	50,000.00	0.00	50,000.00	
				3003475 Total				50,000.00	0.00	50,000.00	1
Policy No: 3007165 Limits (Occ/Agg): \$1M/\$2M* Prior Payments \$ 348.00	2372	Insured		3007165	\$1M/\$1M* Assault and Battery	100,000.00	3	0.00	0.00	0.00	
	2373	Insured		3007165		40,000.00	3	11,000.00	20,000.00	31,000.00	
				3007165 Total				11,000.00	20,000.00	31,000.00	1
Policy No: 3007363 Limits (Occ/Agg): \$1M/\$2M Prior Payments \$198,658.76	2374	Injured Party		3007363		175,000.00	3	80,000.00		80,000.00	
				3007363 Total				80,000.00	0.00	80,000.00	1
Policy No: 5000173 Limits (Occ/Agg): \$1M/\$2M Prior Payments \$713.00	1023	Injured Party		5000173	\$1M/\$1M Liquor Liability	7,154,480.09	3	250,000.00		250,000.00	
				5000173 Total				250,000.00	0.00	250,000.00	1
Policy No: 6000064 Limits (Occ/Agg): \$1M/\$2M Prior Payments \$770,754.03	1087	Injured Party		6000064	\$1M/\$1M* Assault and Battery	72,000.00	3	72,000.00		72,000.00	
	2552	Insured		6000064	\$1M/\$1M* Assault and Battery	226,809.75	3	208,317.00	18,500.00	226,817.00	
	2571	Insured		6000064		156,687.50	3	0.00	10,000.00	10,000.00	
			6000064 Total				280,317.00	28,500.00	308,817.00	1	
Policy No: 6000112 Limits (Occ/Agg): \$1M/\$2M	2519	Injured Party		6000112	\$100K/\$100K* Assault and Battery	250,000.00	3	25,000.00		25,000.00	
				6000112 Total				25,000.00	0.00	25,000.00	1
Policy No: 6000190 Limits (Occ/Agg): \$1M/\$2M Prior Payments \$25,699.20	2203	Insured		6000190		5,000.00	3	90,000.00	20,000.00	110,000.00	
				6000190 Total				90,000.00	20,000.00	110,000.00	1
Policy No: 6000222 Limits (Occ/Agg): \$1M/\$2M Prior Payments \$26,059.74	0720	Insured	0720	6000222		46,000.00	3	70,000.00	20,000.00	90,000.00	
	0721	Insured - Duplicate	0720	6000222			3	0.00	0.00	0.00	
				6000222 Total				70,000.00	20,000.00	90,000.00	1
Policy No: 6000426 Limits (Occ/Agg): \$1M/\$2M Prior Payments \$98,272.05	0542	Injured Party		6000426		200,000.00	3	50,000.00		50,000.00	
	0293	Injured Party		6000426			3	20,000.00		20,000.00	
				6000426 Total				70,000.00	0.00	70,000.00	1
Policy No: 6000461 Limits (Occ/Agg): \$1M/\$2M Prior Payments \$3,000.00	2226	Injured Party		6000461		2,000,000.00	3	40,000.00		40,000.00	
				6000461 Total				40,000.00	0.00	40,000.00	1
Policy No: 6000687 Limits (Occ/Agg): \$1M/\$2M Prior Payments \$20,082.68	1852	Insured	1852	6000687	\$1M/\$1M* Assault and Battery	15,646.00	3	50,000.00	15,000.00	65,000.00	
	1134	Injured Party	1852	6000687		150,000.00	3			0.00	
				6000687 Total				50,000.00	15,000.00	65,000.00	1
Policy No: 6000695 Limits (Occ/Agg): \$1M/\$2M Prior Payments \$30,561.72	0488	Injured Party	2293	6000695		750,000.00	3			0.00	
	0412	Insured	2293	6000695			3	175,000.00	20,000.00	195,000.00	
	2293	Insured - Duplicate	2293	6000695		750,000.00	3	0.00	0.00	0.00	
	2294	Insured - Duplicate	2293	6000695		2,500.00	3	0.00	0.00	0.00	
			6000695 Total				175,000.00	20,000.00	195,000.00	1	
Policy No: 6000760 Limits (Occ/Agg): \$1M/\$2M Prior Payments \$32,461.83	0044	Injured Party	2198	6000760	\$1M/\$1M* Assault and Battery	49,000.00	3			0.00	
	2198	Insured	2198	6000760			3	25,000.00	25,000.00	50,000.00	
	2199	Insured		6000760	\$1M/\$1M* Assault and Battery		3	50,000.00	25,000.00	75,000.00	

Policy Information	Proof of Claim Number	Claimant Type	Connected Claims	Primary Policy Number	Sub-limit & Type (If applicable to claim & less than standard policy limits)	Amount Claimed On Proof of Claim Form	Receiver's Recommended Priority Class	Receiver's Recommended Indemnity Value	Receiver's Recommended Defense Value	Receiver's Recommended Total Value	NOD Summary File Part
				6000760 Total				75,000.00	50,000.00	125,000.00	1
Policy No: 6000807 Limits (Occ/Agg): \$1M/\$2M Prior Payments \$198,820.72	1387	Injured Party - Duplicate	2561	6000807	\$1M/\$1M* Assault and Battery per location		3	0.00		0.00	
	1388	Injured Party - Duplicate	2561	6000807			3	0.00		0.00	
	2561	Insured	2561	6000807		298,800.00	3	55,000.00	20,000.00	75,000.00	
	1359	Injured Party	2561	6000807		1,000,000.00	3			0.00	
	1360	Injured Party	2561	6000807		1,000,000.00	3			0.00	
	2565	Insured		6000807		491,000.40	3	45,000.00	4,100.00	49,100.00	
	2573	Insured		6000807	\$1M/\$1M* Assault and Battery per location	1,087,025.00	3	250,000.00	35,000.00	285,000.00	
	2553	Insured		6000807	\$1M/\$1M* Assault and Battery per location	2,016,922.00	3	750,000.00		750,000.00	
	2570	Insured		6000807	\$1M/\$1M* Assault and Battery per location	314,064.18	3	250,000.00		250,000.00	
	2577	Insured		6000807	\$1M/\$1M* Assault and Battery per location	261,612.50	3	225,000.00	30,000.00	255,000.00	
					6000807 Total				1,575,000.00	89,100.00	1,664,100.00
Policy No: 6000857 Limits (Occ/Agg): \$1M/\$2M	0713	Insured	0713	6000857	\$100K/\$100K* Assault and Battery		3	20,000.00	15,000.00	35,000.00	
	1323	Injured Party	0713	6000857		150,000.00	3			0.00	
					6000857 Total				20,000.00	15,000.00	35,000.00
Policy No: 6000890 Limits (Occ/Agg): \$1M/\$2M Prior Payments \$6,742.64	0666	Injured Party	0666	6000890	\$1M/\$1M* Assault and Battery	500,000.00	3	50,000.00		50,000.00	
	0667	Injured Party	0666	6000890		50,000.00	3	1,000.00		1,000.00	
					6000890 Total				51,000.00	0.00	51,000.00
Policy No: 6001009 Limits (Occ/Agg): \$1M/\$2M	2482	Insured		6001009	Assault and Battery Excluded	550,000.00	3	0.00	0.00	0.00	
					6001009 Total				0.00	0.00	0.00
Policy No: 6001142 Limits (Occ/Agg): \$1M/\$2M Prior Payments \$18,720.81	0914	Injured Party	0914	6001142		1,000,000.00	3			0.00	
	2236	Insured	0914	6001142		1,000,000.00	3	100,000.00	25,000.00	125,000.00	
	2238	Insured - Duplicate	0914	6001142		15,000.00	3	0.00	0.00	0.00	
					6001142 Total				100,000.00	25,000.00	125,000.00
Policy No: 6001151 Limits (Occ/Agg): \$1M/\$2M Prior Payments \$7,782.65	0061	Insured - Master		6001151			3	0.00	0.00	0.00	
	0061_A	Insured		6001151	\$1M/\$1M* Assault and Battery		3	40,000.00	17,500.00	57,500.00	
					6001151 Total				40,000.00	17,500.00	57,500.00
Policy No: 6001156 Limits (Occ/Agg): \$1M/\$2M Prior Payments \$17,612.95	1011	Injured Party		6001156	\$1M/\$1M* Assault and Battery	75,000.00	3	35,000.00		35,000.00	
					6001156 Total				35,000.00	0.00	35,000.00
Policy No: 6001177 Limits (Occ/Agg): \$1M/\$2M Prior Payments \$31,478.88	1717	Insured	0154	6001177		90,000.00	3	15,000.00	20,000.00	35,000.00	
	0154	Injured Party	0154	6001177		300,000.00	3			0.00	
					6001177 Total				15,000.00	20,000.00	35,000.00
Policy No: 6001248 Limits (Occ/Agg): \$1M/\$2M Prior Payments \$27,328.16	2188	Injured Party		6001248	\$1M/\$1M Liquor Liability	1,000,000.00	3	750,000.00		750,000.00	
					6001248 Total				750,000.00	0.00	750,000.00
Policy No: 6001339 Limits (Occ/Agg): \$1M/\$2M per location \$5M Policy Aggregate Prior Payments \$217,690.87	2074	Insured	1043	6001339	\$100K/\$1M* Assault and Battery	1,000,000.00	3	70,000.00	13,362.00	83,362.00	
	1043	Injured Party	1043	6001339		100,000.00	3			0.00	
	2118	Insured	1178	6001339	\$1M/\$1M Liquor Liability per location	1,000,000.00	3	250,000.00	5,000.00	255,000.00	
	1178	Injured Party	1178	6001339		100,000.00	3			0.00	
	2114	Insured	1336	6001339		1,000,000.00	3	100,000.00	5,000.00	105,000.00	
	2086	Insured - Duplicate	1336	6001339		1,000,000.00	3	0.00	0.00	0.00	
	1336	Injured Party	1336	6001339		250,000.00	3			0.00	
	1339	Injured Party - Duplicate	1336	6001339			3			0.00	
	2005	Injured Party	2005	6001339	\$100K/\$1M* Assault and Battery	900,000.00	3			0.00	
	2087	Insured	2005	6001339		1,000,000.00	3	80,511.00	0.00	80,511.00	
	2116	Insured	2116	6001339	\$100K/\$1M* Assault and Battery	1,000,000.00	3	82,485.00	0.00	82,485.00	
	0187	Injured Party	2116	6001339		60,000.00	3			0.00	

Policy Information	Proof of Claim Number	Claimant Type	Connected Claims	Primary Policy Number	Sub-limit & Type (If applicable to claim & less than standard policy limits)	Amount Claimed On Proof of Claim Form	Receiver's Recommended Priority Class	Receiver's Recommended Indemnity Value	Receiver's Recommended Defense Value	Receiver's Recommended Total Value	NOD Summary File Part
	2078	Insured		6001339	\$1M/\$1M Liquor Liability per location	1,000,000.00	3	800,000.00	25,000.00	825,000.00	
	2088	Insured		6001339		1,000,000.00	3	40,000.00	10,000.00	50,000.00	
	2107	Insured		6001339	\$100K/\$1M* Assault and Battery	1,000,000.00	3	77,661.00	10,000.00	87,661.00	
	2081	Insured		6001339			3	35,000.00	10,000.00	45,000.00	
					6001339 Total				1,535,657.00	78,362.00	1,614,019.00
Policy No: 6001344 Limits (Occ/Agg): \$1M/\$2M Prior Payments \$7,909.67	2592	Insured		6001344	\$1M/\$1M Liquor Liability	9,340.00	3	200,000.00	25,000.00	225,000.00	
				6001344 Total				200,000.00	25,000.00	225,000.00	1
Policy No: 6001406 Limits (Occ/Agg): \$1M/\$2M Prior Payments \$33,943.02	1386	Injured Party		6001406	\$100K/\$100K* Assault and Battery	10,000.00	3	65,000.00		65,000.00	
				6001406 Total				65,000.00	0.00	65,000.00	1
Policy No: 6001448 Limits (Occ/Agg): \$1M/\$2M Excess Limits \$4M/\$4M Prior Payments \$122,334.57	1678	Insured	0794	6001448	\$1M/\$1M* Assault and Battery	75,000.00	3	40,000.00	20,000.00	60,000.00	
	0794	Injured Party	0794	6001448		300,000.00	3			0.00	
	1694	Insured - Additional	1694	6001448		1,330,000.00	3	150,000.00	20,000.00	170,000.00	
	1695	Insured	1694	6001448		1,330,000.00	3	145,000.00	55,000.00	200,000.00	
	1139	Injured Party	1694	6001448			3			0.00	
	1140	Injured Party - Duplicate	1694	6001448		3,000,000.00	3	0.00		0.00	
	1825	Insured	1825	6001448	\$1M/\$1M* Assault and Battery	2,545,000.00	3	400,000.00	100,000.00	500,000.00	
	1092	Injured Party	1825	6001448		5,000,000.00	3			0.00	
	1855	Insured	1855	6001448	\$1M/\$1M* Assault and Battery	80,000.00	3	5,000.00	5,000.00	10,000.00	
	2535	Injured Party	1855	6001448		1,000,000.00	3			0.00	
				6001448 Total				740,000.00	200,000.00	940,000.00	1
Policy No: 6001516 Limits (Occ/Agg): \$1M/\$2M Prior Payments \$11,597.89	0592	Insured - Duplicate	1719	6001516	\$1M/\$1M* Liquor Liability		3	0.00	0.00	0.00	
	0939	Insured - Duplicate	1719	6001516			3	0.00	0.00	0.00	
	1719	Insured	1719	6001516		790,000.00	3	25,000.00	25,000.00	50,000.00	
	0389	Injured Party	1723	6001516	\$1M/\$1M* Assault and Battery	1,250,000.00	3			0.00	
	0390	Injured Party - Duplicate	1723	6001516			3			0.00	
	1723	Insured	1723	6001516		255,000.00	3	175,000.00	20,000.00	195,000.00	
	0938	Insured - Duplicate	1723	6001516			3	0.00	0.00	0.00	
	1427	Injured Party		6001516		500,000.00	3	37,500.00		37,500.00	
					6001516 Total				237,500.00	45,000.00	282,500.00
Policy No: 6001536 Limits (Occ/Agg): \$1M/\$2M	2194	Insured		6001536	\$1M/\$1M* Assault and Battery		3	375,000.00	75,000.00	450,000.00	
				6001536 Total				375,000.00	75,000.00	450,000.00	1
Policy No: 6001621 Limits (Occ/Agg): \$1M/\$2M Prior Payments \$35,931.56	0546	Injured Party	0547	6001621	\$1M/\$1M Liquor Liability	1,000,000.00	3			0.00	
	0547	Injured Party	0547	6001621		1,000,000.00	3			0.00	
	1382	Insured	0547	6001621		500,000.00	3	350,000.00	25,000.00	375,000.00	
	0693	Injured Party	0693	6001621	\$1M/\$1M Liquor Liability	1,000,000.00	3			0.00	
	0694	Injured Party - Duplicate	0693	6001621		1,000,000.00	3			0.00	
	0695	Injured Party	0693	6001621		1,000,000.00	3			0.00	
	1383	Insured	0693	6001621		100,000.00	3	650,000.00	25,000.00	675,000.00	
	1309	Injured Party - Duplicate	0693	6001621		1,000,000.00	3			0.00	
	1310	Injured Party	0693	6001621		1,000,000.00	3			0.00	
	1311	Injured Party - Duplicate	0693	6001621		1,000,000.00	3			0.00	
	1312	Injured Party - Duplicate	0693	6001621		1,000,000.00	3			0.00	
	1313	Injured Party - Duplicate	0693	6001621		1,000,000.00	3			0.00	
					6001621 Total				1,000,000.00	50,000.00	1,050,000.00
	0494	Injured Party	0494	6001627	\$2M/\$2M* Assault and Battery per location	375,000.00	3			0.00	

Policy Information	Proof of Claim Number	Claimant Type	Connected Claims	Primary Policy Number	Sub-limit & Type (If applicable to claim & less than standard policy limits)	Amount Claimed On Proof of Claim Form	Receiver's Recommended Priority Class	Receiver's Recommended Indemnity Value	Receiver's Recommended Defense Value	Receiver's Recommended Total Value	NOD Summary File Part
Policy No: 6001627 Limits (Occ/Agg): \$1M/\$2M per location \$5M Pol Agg Excess Limits(Occ/Agg): \$5M/\$5M Prior Payments \$193,070.85	0495	Injured Party - Duplicate	0494	6001627			3			0.00	
	2554	Insured	0494	6001627		216,848.68	3	50,000.00	17,500.00	67,500.00	
	1389	Injured Party	1389	6001627	\$2M/\$2M* Assault and Battery per location	1,000,000.00	3			0.00	
	1394	Injured Party - Duplicate	1389	6001627			3			0.00	
	2548	Insured	1389	6001627		196,850.00	3	100,000.00	175,000.00	275,000.00	
	1576	Injured Party	1576	6001627	\$2M/\$2M* Assault and Battery per location	50,000.00	3			0.00	
	2558	Insured	1576	6001627		117,209.50	3	45,000.00	17,500.00	62,500.00	
	2569	Insured		6001627		2,156,766.90	3	2,250,000.00	100,000.00	2,350,000.00	
	2580	Insured		6001627		6,210,550.00	3	2,250,000.00	60,000.00	2,310,000.00	
	2545	Insured		6001627	\$2M/\$2M* Assault and Battery per location	1,091,800.00	3	250,000.00	50,000.00	300,000.00	
	2564	Insured		6001627	\$2M/\$2M* Assault and Battery per location	182,356.36	3	100,000.00	40,000.00	140,000.00	
	2582	Insured		6001627	\$2M/\$2M* Assault and Battery per location	173,800.00	3	10,000.00	25,000.00	35,000.00	
	2550	Insured		6001627	\$2M/\$2M* Assault and Battery per location	65,474.00	3	25,000.00	15,474.00	40,474.00	
					6001627 Total				5,080,000.00	500,474.00	5,580,474.00
Policy No: 6001644 Limits (Occ/Agg): \$1M/\$2M Prior Payments \$12,030.93	1020	Insured		6001644	\$100K/\$100K* Assault and Battery		3	10,000.00	5,000.00	15,000.00	
				6001644 Total				10,000.00	5,000.00	15,000.00	2
Policy No: 6001686 Limits (Occ/Agg): \$1M/\$2M	1083	Injured Party		6001686	\$1M/\$1M* Assault and Battery	400,000.00	3	250,000.00		250,000.00	
				6001686 Total				250,000.00	0.00	250,000.00	2
Policy No: 6001734 Limits (Occ/Agg): \$1M/\$2M Prior Payments \$24,023.15	0223	Injured Party		6001734		250,000.00	3	95,000.00		95,000.00	
				6001734 Total				95,000.00	0.00	95,000.00	2
Policy No: 6001745 Limits (Occ/Agg): \$1M/\$2M Prior Payments \$37,595.29	2286	Insured		6001745		585,500.00	3	325,000.00	25,000.00	350,000.00	
	0472	Injured Party		6001745		15,000.00	3	200,000.00		200,000.00	
				6001745 Total				525,000.00	25,000.00	550,000.00	2
Policy No: 6001760 Limits (Occ/Agg): \$1M/\$2M	1392_A	Injured Party	1392_A	6001760	\$1M/\$1M* Assault and Battery		3	100,000.00		100,000.00	
	1392_B	Injured Party	1392_A	6001760			3	700,000.00		700,000.00	
	1392	Injured Party - Master		6001760		300,000.00	3	0.00		0.00	
				6001760 Total				800,000.00	0.00	800,000.00	2
Policy No: 6001862 Limits (Occ/Agg): \$1M/\$2M Prior Payments \$22,267.00	2205	Insured		6001862	\$100K/\$100K* Assault and Battery	500,000.00	3	50,000.00	0.00	50,000.00	
	2206	Insured		6001862	\$100K/\$100K* Assault and Battery	100,000.00	3	50,000.00	0.00	50,000.00	
				6001862 Total				100,000.00	0.00	100,000.00	2
Policy No: 6001879 Limits (Occ/Agg): \$1M/\$2M Prior Payments \$77,360.26	1320	Injured Party		6001879	\$1M/\$1M Liquor Liability	1,000,000.00	3	200,000.00		200,000.00	
				6001879 Total				200,000.00	0.00	200,000.00	2
Policy No: 6001895 Limits (Occ/Agg): \$1M/\$2M Prior Payments \$9,482.95	2483	Insured		6001895	\$100K/\$100K* Assault and Battery	560,000.00	3	0.00	0.00	0.00	
				6001895 Total				0.00	0.00	0.00	2
Policy No: 6002022 Limits (Occ/Agg): \$1M/\$2M Prior Payments \$1,999.00	0061_B	Insured		6002022			3	15,000.00	10,000.00	25,000.00	
				6002022 Total				15,000.00	10,000.00	25,000.00	2
Policy No: 6002055 Limits (Occ/Agg): \$1M/\$2M Prior Payments \$670.50	2479	Injured Party	0364	6002055	\$1M/\$1M Liquor Liability	1,000,000.00	3			0.00	
	0364	Insured	0364	6002055		43,905.05	3	400,000.00	60,000.00	460,000.00	
	0365	Insured - Duplicate	0364	6002055		43,905.05	3	0.00	0.00	0.00	
	0366	Insured - Duplicate	0364	6002055			3	0.00	0.00	0.00	

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				6002055 Total				400,000.00	60,000.00	460,000.00	2
Policy No: 6002078 Limits (Occ/Agg): \$1M/\$2M	1708	Insured		6002078	\$1M/\$1M* Assault and Battery	110,000.00	3	0.00	5,000.00	5,000.00	
				6002078 Total				0.00	5,000.00	5,000.00	2
Policy No: 6002091 Limits (Occ/Agg): \$1M/\$2M Excess Limits \$1M/\$1M Prior Payments \$46,770.08	2627	Injured Party	2626	6002091	\$1M/\$1M Liquor Liability	1,000,000.00	3			0.00	
	2626	Injured Party	2626	6002091		10,000,000.00	3			0.00	
	2628	Injured Party	2626	6002091			3			0.00	
	2629	Injured Party	2626	6002091			3			0.00	
	2630	Injured Party	2626	6002091			3			0.00	
	2631	Injured Party	2626	6002091			3			0.00	
	2632	Injured Party	2626	6002091			3			0.00	
	2633	Injured Party	2626	6002091			3			0.00	
	2634	Injured Party	2626	6002091		1,000,000.00	3			0.00	
	2635	Injured Party	2626	6002091		10,000,000.00	3			0.00	
	2769_C	Insured	2626	6002091			7	2,000,000.00	25,000.00	2,025,000.00	
	2769_B	Insured		6002091	\$100K/\$100K* Assault and Battery		7	64,625.00	0.00	64,625.00	
	2769	Insured - Master POC		6002091			7	0.00	0.00	0.00	
	2769_D	Insured		6002091	\$1M/\$1M Liquor Liability		7	0.00	0.00	0.00	
				6002091 Total				2,064,625.00	25,000.00	2,089,625.00	2
Policy No: 6002155 Limits (Occ/Agg): \$1M/\$2M Prior Payments \$9,689.87	0285	Injured Party	1385	6002155	\$1M/\$1M* Liquor Liability		3			0.00	
	0286	Injured Party	1385	6002155			3			0.00	
	0981	Injured Party - Duplicate	1385	6002155			3	0.00		0.00	
	0982	Injured Party - Duplicate	1385	6002155			3	0.00		0.00	
	1385	Insured	1385	6002155			3	100,000.00	25,000.00	125,000.00	
				6002155 Total				100,000.00	25,000.00	125,000.00	2
Policy No: 6002269 Limits (Occ/Agg): \$1M/\$2M Prior Payments \$1,305.00	2463	Injured Party		6002269	\$1M/\$1M* Assault and Battery	750,000.00	3	0.00		0.00	
				6002269 Total				0.00	0.00	0.00	2
Policy No: 6002301 Limits (Occ/Agg): \$1M/\$2M Prior Payments \$16,415.81	2513	Insured	0644	6002301		390,046.91	3	100,000.00	25,000.00	125,000.00	
	0644	Injured Party	0644	6002301			3			0.00	
	2511	Insured	1318	6002301		342,040.00	3	130,000.00	25,000.00	155,000.00	
	1318	Injured Party	1318	6002301		850,000.00	3			0.00	
				6002301 Total				230,000.00	50,000.00	280,000.00	2
Policy No: 6002311 Limits (Occ/Agg): \$1M/\$2M Prior Payments \$8,355.62	0798	Injured Party		6002311	\$1M/\$1M* Assault and Battery		3	600,000.00		600,000.00	
				6002311 Total				600,000.00	0.00	600,000.00	2
Policy No: 6002345 Limits (Occ/Agg): \$1M/\$2M Prior Payments \$21,410.76	0231	Injured Party	1834	6002345	\$1M/\$1M* Assault and Battery	1,000,000.00	3			0.00	
	1834	Insured	1834	6002345		8,544.00	3	20,000.00	10,000.00	30,000.00	
				6002345 Total				20,000.00	10,000.00	30,000.00	2
Policy No: 6002411 Limits (Occ/Agg): \$1M/\$2M Prior Payments \$30,090.46	1048	Injured Party	1048	6002411	\$1M/\$1M Liquor Liability	2,500,000.00	3	687,500.00		687,500.00	
	1078	Injured Party - Duplicate	1048	6002411			3	0.00		0.00	
	1228	Injured Party	1048	6002411		500,000.00	3	62,500.00		62,500.00	
	1236	Injured Party	1048	6002411		500,000.00	3	250,000.00		250,000.00	
	2679	Injured Party		6002411	\$1M/\$1M* Assault and Battery	5,200,000.00	3	300,000.00		300,000.00	
	2325	Injured Party		6002411	\$1M/\$1M* Assault and Battery	100,000.00	3	25,000.00		25,000.00	
				6002411 Total				1,325,000.00	0.00	1,325,000.00	2
Policy No: 6002444 Limits (Occ/Agg): \$1M/\$2M Prior Payments \$3,201.00	0575	Injured Party		6002444	\$1M/\$1M* Assault and Battery	133,875.00	3	20,000.00		20,000.00	
				6002444 Total				20,000.00	0.00	20,000.00	2
Policy No: 6002476 Limits (Occ/Agg): \$1M/\$2M	2521	Insured	2157	6002476	\$1M/\$1M Liquor Liability	1,000,000.00	3	250,000.00	25,000.00	275,000.00	
	2760	Insured - Duplicate	2157	6002476			7			0.00	
	2157	Injured Party	2157	6002476		1,000,000.00	3			0.00	
	2158	Injured Party	2157	6002476		1,000,000.00	3			0.00	
				6002476 Total				250,000.00	25,000.00	275,000.00	2
	2542	Injured Party	2780	6002493			3			0.00	

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Policy No: 6002493 Limits (Occ/Agg): \$1M/\$2M	2780	Insured	2780	6002493		31,278.80	3	25,000.00	10,000.00	35,000.00	
	6002493 Total							25,000.00	10,000.00	35,000.00	2
Policy No: 6002526 Limits (Occ/Agg): \$1M/\$2M Prior Payments \$18,000.00	1168	Insured	1170	6002526	\$1M/\$1M Liquor Liability		3	187,500.00	8,750.00	196,250.00	
	1170	Insured	1170	6002526			3	187,500.00	8,750.00	196,250.00	
	1172	Insured	1170	6002526			3	187,500.00	8,750.00	196,250.00	
	1173	Insured	1170	6002526			3	187,500.00	8,750.00	196,250.00	
	1413	Injured Party	1170	6002526		10,000,000.00	3			0.00	
	1167	Insured		6002526			3	35,000.00	25,000.00	60,000.00	
	1171	Insured		6002526	\$1M/\$1M Liquor Liability		3	250,000.00	60,000.00	310,000.00	
	1169	Insured		6002526		50,287.00	3	0.00	0.00	0.00	
	6002526 Total							1,035,000.00	120,000.00	1,155,000.00	2
Policy No: 6002531 Limits (Occ/Agg): \$1M/\$2M per location \$10M Pol Agg Excess Limits \$5M/\$5M Prior Payments \$83,290.43	2562	Insured	1234	6002531		587,825.00	3	600,000.00	30,000.00	630,000.00	
	1234	Injured Party	1234	6002531		250,000.00	3			0.00	
	1235	Injured Party	1234	6002531		500,000.00	3			0.00	
	1993	Injured Party	1993	6002531		1,000,000.00	3			0.00	
	2563	Insured	1993	6002531		63,659.50	3	17,500.00	15,000.00	32,500.00	
	0931	Injured Party	2544	6002531	\$2M/\$2M* Assault and Battery per location	180,000.00	3			0.00	
	2544	Insured	2544	6002531		283,100.00	3	140,000.00	25,000.00	165,000.00	
	2549	Insured	2549	6002531		11,132,300.00	3	650,000.00	50,000.00	700,000.00	
	1055	Injured Party	2549	6002531		750,000.00	3			0.00	
	2169	Injured Party	2581	6002531	\$2M/\$2M* Assault and Battery per location	10,000,000.00	3			0.00	
	2170	Injured Party - Duplicate	2581	6002531			3			0.00	
	2171	Injured Party - Duplicate	2581	6002531			3			0.00	
	2581	Injured Party	2581	6002531		2,030,075.72	3	1,000,000.00	50,000.00	1,050,000.00	
	1324	Injured Party		6002531	\$2M/\$2M* Assault and Battery per location	750,000.00	3	50,000.00		50,000.00	
	2546	Insured		6002531		272,799.56	3	350,000.00	25,000.00	375,000.00	
	2547	Insured		6002531	\$2M/\$2M* Assault and Battery per location	1,089,850.00	3	100,000.00	50,000.00	150,000.00	
	2556	Insured		6002531		115,278.00	3	25,000.00	15,000.00	40,000.00	
	2566	Insured		6002531	\$2M/\$2M* Assault and Battery per location	7,599,200.00	3	800,000.00	175,000.00	975,000.00	
	2568	Insured		6002531	\$2M/\$2M* Assault and Battery per location	592,300.00	3	200,000.00	35,000.00	235,000.00	
	2575	Insured		6002531	\$2M/\$2M* Assault and Battery per location	553,000.00	3	75,000.00	25,000.00	100,000.00	
2576	Insured		6002531	\$2M/\$2M* Assault and Battery per location	370,450.00	3	43,500.00	30,000.00	73,500.00		
6002531 Total							4,051,000.00	525,000.00	4,576,000.00	2	
Policy No: 6002576 Limits (Occ/Agg): \$1M/\$2M Prior Payments \$10,491.11	2185_E	Insured		6002576			3	0.00	0.00	0.00	
	2185_G	Insured		6002576	\$1M/\$1M Liquor Liability per location		3	700,000.00	50,000.00	750,000.00	
	6002576 Total							700,000.00	50,000.00	750,000.00	2
Policy No: 6002596 Limits (Occ/Agg): \$1M/\$2M Prior Payments \$300.00	0531	Injured Party		6002596	\$100K/\$100K* Assault and Battery	1,000,000.00	3	35,000.00		35,000.00	
	6002596 Total							35,000.00	0.00	35,000.00	2
Policy No: 6002673 Limits (Occ/Agg): \$1M/\$2M Prior Payments \$3,436.00	1554	Injured Party		6002673	\$1M/\$1M* Assault and Battery	50,000.00	3	50,000.00		50,000.00	
	6002673 Total							50,000.00	0.00	50,000.00	2
Policy No: 6002695 Limits (Occ/Agg): \$1M/\$2M	0947	Injured Party		6002695	\$1M/\$1M* Assault and Battery	1,000,000.00	3	22,500.00		22,500.00	
	6002695 Total							22,500.00	0.00	22,500.00	2
Policy No: 6002697 Limits (Occ/Agg): \$1M/\$2M	2824	Insured	2824	6002697	\$1M/\$1M* Assault and Battery	42,500.00	7	150,000.00	20,000.00	170,000.00	
	2825	Injured Party	2824	6002697		500,000.00	7			0.00	
	6002697 Total							150,000.00	20,000.00	170,000.00	2
Policy No: 6002753	1699	Insured - Additional	1699	6002753		230,000.00	3	15,000.00	5,000.00	20,000.00	

Policy Information	Proof of Claim Number	Claimant Type	Connected Claims	Primary Policy Number	Sub-Limit & Type (If applicable to claim & less than standard policy limits)	Amount Claimed On Proof of Claim Form	Receiver's Recommended Priority Class	Receiver's Recommended Indemnity Value	Receiver's Recommended Defense Value	Receiver's Recommended Total Value	NOD Summary File Part
Limits (Occ/Agg): \$1M/\$2M Prior Payments \$14,361.13	1698	Insured	1699	6002753		230,000.00	3	15,000.00	5,000.00	20,000.00	
	1858	Injured Party	1699	6002753		1,000,000.00	3			0.00	
	6002753 Total								30,000.00	10,000.00	40,000.00
Policy No: 6002823 Limits (Occ/Agg): \$1M/\$2M Prior Payments \$305.00	0388	Injured Party	2204	6002823	\$100K/\$100K* Assault and Battery	875,000.00	3			0.00	
	0537	Injured Party - Duplicate	2204	6002823		875,000.00	3			0.00	
	2204	Insured	2204	6002823		500,000.00	3	50,000.00		50,000.00	
	0232	Injured Party		6002823		8,832.87	3	4,000.00		4,000.00	
	2207	Insured		6002823	\$100K/\$100K* Assault and Battery	1,000,000.00	3	50,000.00		50,000.00	
	6002823 Total								104,000.00	0.00	104,000.00
Policy No: 6002856 Limits (Occ/Agg): \$1M/\$2M Prior Payments \$285.00	2735	Injured Party		6002856		95,000.00	7	27,500.00		27,500.00	
	2484	Insured		6002856	\$100K/\$100K* Assault and Battery	575,000.00	3	65,000.00		65,000.00	
	2485	Insured		6002856	\$100K/\$100K* Assault and Battery	775,000.00	3	35,000.00		35,000.00	
	6002856 Total								127,500.00	0.00	127,500.00
Policy No: 6002902 Limits (Occ/Agg): \$1M/\$2M	0756	Injured Party		6002902	\$1M/\$1M* Assault and Battery	100,000.00	3	0.00		0.00	
6002902 Total								0.00	0.00	0.00	2
Policy No: 6002950 Limits (Occ/Agg): \$1M/\$2M Prior Payments \$565.50	0915	Injured Party	0915	6002950	\$1M/\$1M* Assault and Battery		3			0.00	
	2292	Insured	0915	6002950		100,000.00	3	35,000.00	25,000.00	60,000.00	
6002950 Total								35,000.00	25,000.00	60,000.00	2
Policy No: 6002957 Limits (Occ/Agg): \$1M/\$2M Prior Payments \$2,461.50	0671	Injured Party - Duplicate	1411	6002957	\$1M/\$1M* Assault and Battery		3	0.00		0.00	
	1411	Injured Party	1411	6002957		30,000.00	3			0.00	
	2248	Insured	1411	6002957		16,760.00	3	15,000.00	10,000.00	25,000.00	
6002957 Total								15,000.00	10,000.00	25,000.00	2
Policy No: 6003008 Limits (Occ/Agg): \$1M/\$2M	2502	Insured	0004	6003008			3	150,000.00	20,000.00	170,000.00	
	0004	Injured Party	0004	6003008		1,000,000.00	3			0.00	
6003008 Total								150,000.00	20,000.00	170,000.00	2
Policy No: 6003041 Limits (Occ/Agg): \$1M/\$2M Prior Payments \$7,134.25	1004	Insured		6003041	\$1M/\$1M* Assault and Battery	150,000.00	3	7,500.00	15,000.00	22,500.00	
6003041 Total								7,500.00	15,000.00	22,500.00	2
Policy No: 6003044 Limits (Occ/Agg): \$1M/\$2M Prior Payments \$18,587.45	1006	Injured Party	1006	6003044	\$1M/\$1M Liquor Liability	50,000.00	3	25,000.00		25,000.00	
	1007	Injured Party	1006	6003044		50,000.00	3	10,000.00		10,000.00	
	2583	Injured Party	1136	6003044	\$1M/\$1M Liquor Liability	7,500,000.00	3	420,000.00		420,000.00	
	2584	Injured Party	1136	6003044		4,500,000.00	3	325,000.00		325,000.00	
	1136	Injured Party	1136	6003044		650,000.00	3	220,000.00		220,000.00	
	6003044 Total								1,000,000.00	0.00	1,000,000.00
Policy No: 6003057 Limits (Occ/Agg): \$1M/\$2M Prior Payments \$1,827.00	0512	Injured Party	0512	6003057	\$1M/\$1M Liquor Liability	250,000.00	3			0.00	
	0061_C	Insured	0512	6003057			3	250,000.00	20,000.00	270,000.00	
6003057 Total								250,000.00	20,000.00	270,000.00	2
Policy No: 6003075 Limits (Occ/Agg): \$1M/\$2M	0974	Insured	0975	6003075	\$1M/\$1M* Assault and Battery		3	0.00	0.00	0.00	
	0975	Insured - Duplicate	0975	6003075			3	0.00	0.00	0.00	
6003075 Total								0.00	0.00	0.00	2
Policy No: 6003092 Limits (Occ/Agg): \$1M/\$2M Prior Payments \$12,407.43	1270	Insured		6003092	\$1M/\$1M Liquor Liability		3	250,000.00	50,000.00	300,000.00	
	1271	Insured		6003092	\$1M/\$1M Liquor Liability		3	750,000.00	75,000.00	825,000.00	
	6003092 Total								1,000,000.00	125,000.00	1,125,000.00
Policy No: 6003093 Limits (Occ/Agg): \$1M/\$2M Prior Payments \$11,892.97	2252	Insured		6003093		425,500.00	3	25,000.00	10,000.00	35,000.00	
6003093 Total								25,000.00	10,000.00	35,000.00	2
Policy No: 6003107 Limits (Occ/Agg): \$1M/\$2M	2729	Injured Party	2724	6003107	\$1M/\$1M Liquor Liability	10,000,000.00	7	500,000.00		500,000.00	
	2724	Injured Party	2724	6003107		1,000,000.00	7	500,000.00		500,000.00	
	6003107 Total								1,000,000.00	0.00	1,000,000.00
Policy No: 6003133 Limits (Occ/Agg): \$1M/\$2M	2849	Injured Party - Duplicate	0162	6003133		1,000,000.00	7	0.00		0.00	
	0162	Injured Party	0162	6003133		1,000,000.00	3	200,000.00		200,000.00	
	2197	Insured		6003133	\$1M/\$1M Liquor Liability		3	200,000.00	25,000.00	225,000.00	
	6003133 Total								400,000.00	25,000.00	425,000.00

Policy Information	Proof of Claim Number	Claimant Type	Connected Claims	Primary Policy Number	Sub-limit & Type (If applicable to claim & less than standard policy limits)	Amount Claimed On Proof of Claim Form	Receiver's Recommended Priority Class	Receiver's Recommended Indemnity Value	Receiver's Recommended Defense Value	Receiver's Recommended Total Value	NOD Summary File Part
Limits (Occ/Agg): \$1M/\$2M Prior Payments \$6,702.14	1737	Insured	0007	6003954		150,000.00	3			0.00	
	1738	Insured	0007	6003954		3,000,000.00	3			0.00	
	1740	Insured	0007	6003954		150,000.00	3	0.00	100,000.00	100,000.00	
	1741	Insured	0007	6003954		3,000,000.00	3	1,000,000.00	0.00	1,000,000.00	
	0007	Injured Party	0007	6003954		3,000,000.00	3			0.00	
				6003954 Total				1,000,000.00	100,000.00	1,100,000.00	3
Policy No: 6003972 Limits (Occ/Agg): \$1M/\$2M	2048	Insured		6003972			3	0.00	0.00	0.00	
	2049	Insured		6003972	\$1M/\$1M* Assault and Battery		3	0.00	0.00	0.00	
				6003972 Total				0.00	0.00	0.00	3
Policy No: 6004081 Limits (Occ/Agg): \$1M/\$2M	1769	Injured Party	2458	6004081		100,000.00	3			0.00	
	2458	Insured	2458	6004081		225,000.00	3	50,000.00	20,000.00	70,000.00	
				6004081 Total				50,000.00	20,000.00	70,000.00	3
Policy No: 6004106 Limits (Occ/Agg): \$1M/\$2M	0552	Injured Party - Duplicate	0008	6004106	\$1M/\$1M* Assault and Battery	300,000.00	3			0.00	
	0828	Injured Party - Duplicate	0008	6004106		300,000.00	3			0.00	
	2247	Insured	0008	6004106		11,760.00	3	30,000.00	10,000.00	40,000.00	
	0008	Injured Party	0008	6004106		300,000.00	3			0.00	
				6004106 Total					30,000.00	10,000.00	40,000.00
Policy No: 6004132 Limits (Occ/Agg): \$1M/\$2M	0970	Insured		6004132		25,237.00	3	14,000.00	5,000.00	19,000.00	
				6004132 Total				14,000.00	5,000.00	19,000.00	3
Policy No: 6004206 Limits (Occ/Agg): \$1M/\$2M	1106	Injured Party	1283	6004206			3	20,000.00		20,000.00	
	1283	Injured Party - Duplicate	1283	6004206		300,000.00	3	0.00		0.00	
				6004206 Total				20,000.00	0.00	20,000.00	3
Policy No: 6004223 Limits (Occ/Agg): \$1M/\$2M	0299	Injured Party	0299	6004223	\$1M/\$1M* Assault and Battery	1,000,000.00	3	25,000.00		25,000.00	
	0300	Injured Party	0299	6004223		3,000,000.00	3	35,000.00		35,000.00	
				6004223 Total				60,000.00	0.00	60,000.00	3
Policy No: 6004300 Limits (Occ/Agg): \$1M/\$2M	0869	Injured Party		6004300		150.00	3	150.00		150.00	
				6004300 Total				150.00	0.00	150.00	3
Policy No: 6004398 Limits (Occ/Agg): \$1M/\$2M	0821	Injured Party	2445	6004398			3			0.00	
	2651	Injured Party - Duplicate	2445	6004398			3			0.00	
	2445	Insured	2445	6004398			3	17,500.00	10,000.00	27,500.00	
				6004398 Total				17,500.00	10,000.00	27,500.00	3
Policy No: 6004475 Limits (Occ/Agg): \$1M/\$2M	2030	Injured Party	2030	6004475	\$1M/\$1M* Assault and Battery	5,000,000.00	3			0.00	
	1535	Insured	2030	6004475		15,000.00	3	150,000.00	25,000.00	175,000.00	
	0749	Injured Party		6004475	\$1M/\$1M* Assault and Battery	1,000,000.00	3	50,000.00		50,000.00	
				6004475 Total				200,000.00	25,000.00	225,000.00	4
Policy No: 6004489 Limits (Occ/Agg): \$1M/\$2M	0383	Injured Party		6004489	\$100K/\$100K* Assault and Battery	500,000.00	3	75,000.00		75,000.00	
				6004489 Total				75,000.00	0.00	75,000.00	4
Policy No: ICA001706-13 Limits (Occ/Agg): \$1M/\$2M	2834	Injured Party		ICA001706-13		1,000,000.00	3	350,000.00		350,000.00	
				ICA001706-13 Total				350,000.00	0.00	350,000.00	4
Policy No: ICA001738-13 Limits (Occ/Agg): \$1M/\$2M	1224	Insured	0291	ICA001738-13		1,000,000.00	3	100,000.00	15,000.00	115,000.00	
	0386	Injured Party - Duplicate	0291	ICA001738-13		1,000,000.00	3			0.00	
	0291	Injured Party	0291	ICA001738-13		1,000,000.00	3			0.00	
	2694	Insured		ICA001738-13			7	25,000.00	15,000.00	40,000.00	
				ICA001738-13 Total				125,000.00	30,000.00	155,000.00	4
Policy No: ICA001747-13 Limits (Occ/Agg): \$1M/\$2M	2029	Injured Party		ICA001747-13		175,000.00	3	15,000.00		15,000.00	
				ICA001747-13 Total				15,000.00	0.00	15,000.00	4
Policy No: ICA001866-13 Limits (Occ/Agg): \$1M/\$2M	2654	Insured		ICA001866-13	Assault and Battery is Excluded		3	0.00	0.00	0.00	
	1530	Injured Party		ICA001866-13		1,000,000.00	3	0.00		0.00	
				ICA001866-13 Total				0.00	0.00	0.00	4
Policy No: ICA001876-13 Limits (Occ/Agg): \$1M/\$2M	1079	Injured Party	1079	ICA001876-13		2,000,000.00	3			0.00	
	1550	Insured	1079	ICA001876-13			3	75,000.00	20,000.00	95,000.00	
				ICA001876-13 Total				75,000.00	20,000.00	95,000.00	4
	2783	Insured		ICA001888-13		12,800.00	7	25,000.00	15,000.00	40,000.00	

Policy Information	Proof of Claim Number	Claimant Type	Connected Claims	Primary Policy Number	Sub-limit & Type (If applicable to claim & less than standard policy limits)	Amount Claimed On Proof of Claim Form	Receiver's Recommended Priority Class	Receiver's Recommended Indemnity Value	Receiver's Recommended Defense Value	Receiver's Recommended Total Value	NOD Summary File Part
Policy No: ICA001888-13 Limits (Occ/Agg): \$1M/\$2M	0335	Insured - Additional		ICA001888-13			3	0.00	0.00	0.00	
				ICA001888-13 Total				25,000.00	15,000.00	40,000.00	4
Policy No: ICA001943-13 Limits (Occ/Agg): \$1M/\$2M	0882	Injured Party		ICA001943-13			3	35,000.00		35,000.00	
				ICA001943-13 Total				35,000.00	0.00	35,000.00	4
Policy No: ICA002003-13 Limits (Occ/Agg): \$1M/\$2M	0239	Insured		ICA002003-13			3	0.00	0.00	0.00	
				ICA002003-13 Total				0.00	0.00	0.00	4
Policy No: ICA002026-13 Limits (Occ/Agg): \$1M/\$2M	2182	Injured Party		ICA002026-13		1,000,000.00	3	50,000.00		50,000.00	
				ICA002026-13 Total				50,000.00	0.00	50,000.00	4
Policy No: ICA002040-13 Limits (Occ/Agg): \$1M/\$2M	2802	Injured Party	0685	ICA002040-13			7			0.00	
	0685	Insured	0685	ICA002040-13			3	45,000.00	15,000.00	60,000.00	
	0686	Insured		ICA002040-13			3	0.00	0.00	0.00	
	0682	Insured		ICA002040-13			3	0.00	0.00	0.00	
	0683	Insured		ICA002040-13			3	0.00	0.00	0.00	
	0684	Insured		ICA002040-13			3	0.00	0.00	0.00	
				ICA002040-13 Total				45,000.00	15,000.00	60,000.00	4
Policy No: ICA002041-13 Limits (Occ/Agg): \$1M/\$2M	0484	Injured Party	0484	ICA002041-13		1,000,000.00	3			0.00	
	0677	Insured	0484	ICA002041-13			3	30,000.00	15,000.00	45,000.00	
	0676	Insured	0675	ICA002041-13			3	0.00	0.00	0.00	
	0675	Insured	0675	ICA002041-13			3	0.00	0.00	0.00	
	0679	Insured		ICA002041-13			3	0.00	0.00	0.00	
	0680	Insured		ICA002041-13			3	0.00	0.00	0.00	
	0678	Insured		ICA002041-13			3	0.00	0.00	0.00	
	0681	Insured		ICA002041-13			3	0.00	0.00	0.00	
				ICA002041-13 Total				30,000.00	15,000.00	45,000.00	4
Policy No: ICA002068-13 Limits (Occ/Agg): \$1M/\$2M	1543	Injured Party	0607	ICA002068-13	\$1M/\$1M* Assault and Battery	1,000,000.00	3			0.00	
	0607	Insured	0607	ICA002068-13			3	10,000.00	7,500.00	17,500.00	
				ICA002068-13 Total				10,000.00	7,500.00	17,500.00	4
Policy No: ICA002108-13 Limits (Occ/Agg): \$1M/\$2M	0295	Insured		ICA002108-13	\$1M/\$1M* Assault and Battery		3	0.00	0.00	0.00	
				ICA002108-13 Total				0.00	0.00	0.00	4
Policy No: ICA002167-13 Limits (Occ/Agg): \$1M/\$2M	0496	Injured Party		ICA002167-13			3	40,000.00		40,000.00	
				ICA002167-13 Total				40,000.00	0.00	40,000.00	4
Policy No: ICA002266-13 Limits (Occ/Agg): \$1M/\$2M	2650	Insured	0124	ICA002266-13		200,000.00	3	0.00	0.00	0.00	
	0124	Injured Party	0124	ICA002266-13			3			0.00	
	0132	Injured Party - Duplicate	0124	ICA002266-13			3			0.00	
	2718	Insured - Duplicate	0124	ICA002266-13		200,000.00	7	0.00	0.00	0.00	
					ICA002266-13 Total				0.00	0.00	0.00
Policy No: ICA002329-13 Limits (Occ/Agg): \$1M/\$2M	2608	Injured Party		ICA002329-13		250,000.00	3	55,000.00		55,000.00	
				ICA002329-13 Total				55,000.00	0.00	55,000.00	4
Policy No: ICA002340-13 Limits (Occ/Agg): \$1M/\$2M	0275	Insured - Additional	0275	ICA002340-13	\$500K/\$1M* Assault and Battery		3	275,000.00	25,000.00	300,000.00	
	0276	Insured - Duplicate Additional	0275	ICA002340-13			3	0.00	0.00	0.00	
	0283	Injured Party	0275	ICA002340-13		5,000,000.00	3			0.00	
	0284	Injured Party - Duplicate	0275	ICA002340-13			3			0.00	
					ICA002340-13 Total				275,000.00	25,000.00	300,000.00
Policy No: ICB100009-12 Limits (Occ/Agg): \$1M/\$2M	2539	Injured Party		ICB100009-12			3	90,000.00		90,000.00	
				ICB100009-12 Total				90,000.00	0.00	90,000.00	4
Policy No: ICB100015-13 Limits (Occ/Agg): \$1M/\$2M	1780	Injured Party	2189	ICB100015-13	\$500K/\$500K Liquor Liability	250,000.00	3			0.00	
	2189	Insured	2189	ICB100015-13		1,000,000.00	3	150,000.00	25,000.00	175,000.00	
				ICB100015-13 Total				150,000.00	25,000.00	175,000.00	4
Policy No: ICB100020-13 Limits (Occ/Agg): \$1M/\$2M	0337	Injured Party	0337	ICB100020-13	\$500K/\$500K Liquor Liability	1,500,000.00	3	225,000.00		225,000.00	
	0338	Injured Party	0337	ICB100020-13			3	50,000.00		50,000.00	
	0339	Injured Party	0337	ICB100020-13			3	50,000.00		50,000.00	
				ICB100020-13 Total				325,000.00	0.00	325,000.00	4

Policy Information	Proof of Claim Number	Claimant Type	Connected Claims	Primary Policy Number	Sub-Limit & Type (If applicable to claim & less than standard policy limits)	Amount Claimed On Proof of Claim Form	Receiver's Recommended Priority Class	Receiver's Recommended Indemnity Value	Receiver's Recommended Defense Value	Receiver's Recommended Total Value	NOD Summary File Part
Policy No: ICB100040-13 Limits (Occ/Agg): \$1M/\$2M	1075	Insured	1075	ICB100040-13	\$500K/\$500K Liquor Liability	15,000.00	3	50,000.00	25,000.00	75,000.00	
	2004	Injured Party	1075	ICB100040-13		250,000.00	3			0.00	
	ICB100040-13 Total								50,000.00	25,000.00	75,000.00
Policy No: ICB100076-13 Limits (Occ/Agg): \$1M/\$2M	1297	Insured		ICB100076-13		25,000.00	3	15,000.00	5,000.00	20,000.00	
	ICB100076-13 Total							15,000.00	5,000.00	20,000.00	4
Policy No: ICB100084-13 Limits (Occ/Agg): \$1M/\$2M	2585	Injured Party	2585	ICB100084-13	\$1M/\$2M* Assault and Battery	450,000.00	3			0.00	
	1531	Insured	2585	ICB100084-13		64,300.00	3	130,000.00	20,000.00	150,000.00	
	1532	Insured - Duplicate	2585	ICB100084-13			3	0.00	0.00	0.00	
	ICB100084-13 Total								130,000.00	20,000.00	150,000.00
Policy No: ICB100106-13 Limits (Occ/Agg): \$1M/\$2M	1111	Injured Party		ICB100106-13	\$1M/\$1M* Assault and Battery	100,000.00	3	15,000.00		15,000.00	
	ICB100106-13 Total								15,000.00	0.00	15,000.00
Policy No: ICB100110-13 Limits (Occ/Agg): \$1M/\$2M	1358	Injured Party		ICB100110-13	\$500K/\$500K Liquor Liability	100,000.00	3	37,500.00		37,500.00	
	ICB100110-13 Total								37,500.00	0.00	37,500.00
Policy No: ICB100157-13 Limits (Occ/Agg): \$1M/\$2M	2618	Insured		ICB100157-13		3,500.00	3	7,500.00	5,000.00	12,500.00	
	ICB100157-13 Total							7,500.00	5,000.00	12,500.00	4
Policy No: ICB100233-13 Limits (Occ/Agg): \$1M/\$2M	0841	Injured Party		ICB100233-13		30,000.00	3	30,000.00		30,000.00	
	ICB100233-13 Total							30,000.00	0.00	30,000.00	4
Policy No: ICB100267-13 Limits (Occ/Agg): \$1M/\$2M	1175	Insured		ICB100267-13	\$500K/\$500K Liquor Liability		3	0.00	0.00	0.00	
	ICB100267-13 Total								0.00	0.00	0.00
Policy No: ICB100276-13 Limits (Occ/Agg): \$1M/\$2M	0631	Injured Party	0311	ICB100276-13			3			0.00	
	0311	Insured	0311	ICB100276-13			3	7,500.00	5,000.00	12,500.00	
	ICB100276-13 Total							7,500.00	5,000.00	12,500.00	4
Policy No: ICB100280-13 Limits (Occ/Agg): \$1M/\$2M	1778	Injured Party		ICB100280-13		4,500.00	3	12,500.00		12,500.00	
	ICB100280-13 Total							12,500.00	0.00	12,500.00	4
Policy No: ICB100300-13 Limits (Occ/Agg): \$1M/\$2M	2847	Insured	0482	ICB100300-13		18,000.00	7	45,000.00	20,000.00	65,000.00	
	0482	Injured Party	0482	ICB100300-13		85,000.00	3			0.00	
	ICB100300-13 Total							45,000.00	20,000.00	65,000.00	4
Policy No: ICB100364-13 Limits (Occ/Agg): \$1M/\$2M	0635	Injured Party		ICB100364-13	\$500K/\$500K Liquor Liability	1,000,000.00	3	500,000.00		500,000.00	
	ICB100364-13 Total								500,000.00	0.00	500,000.00
Policy No: ICB100405-13 Limits (Occ/Agg): \$1M/\$2M	1995	Insured		ICB100405-13	\$1M/\$1M Liquor Liability	30,000.00	3	15,000.00	15,000.00	30,000.00	
	ICB100405-13 Total								15,000.00	15,000.00	30,000.00
Policy No: ICB100460-13 Limits (Occ/Agg): \$1M/\$2M	2858	Injured Party		ICB100460-13	\$1M/\$1M Liquor Liability	5,000,000.00	7	1,000,000.00		1,000,000.00	
	ICB100460-13 Total								1,000,000.00	0.00	1,000,000.00
Policy No: ICB100481-13 Limits (Occ/Agg): \$1M/\$2M	1063	Insured		ICB100481-13		60,000.00	3	20,000.00	15,000.00	35,000.00	
	ICB100481-13 Total							20,000.00	15,000.00	35,000.00	4
Policy No: ICC200007-13 Limits (Occ/Agg): \$1M/\$2M	0367	Injured Party		ICC200007-13		61,500.00	3	75,000.00		75,000.00	
	ICC200007-13 Total							75,000.00	0.00	75,000.00	4
Policy No: ICC200100-13 Limits (Occ/Agg): \$1M/\$2M	0221	Injured Party		ICC200100-13		40,000.00	3	12,500.00		12,500.00	
	ICC200100-13 Total							12,500.00	0.00	12,500.00	4
Policy No: ICC200102-13 Limits (Occ/Agg): \$1M/\$2M	0593	Injured Party		ICC200102-13		107,629.65	3	15,000.00		15,000.00	
	ICC200102-13 Total							15,000.00	0.00	15,000.00	4
Policy No: ICC200107-13 Limits (Occ/Agg): \$1M/\$2M	0878	Injured Party	0878	ICC200107-13		200,000.00	3			0.00	
	2753	Insured	0878	ICC200107-13			7	150,000.00	15,000.00	165,000.00	
	2759	Insured - Duplicate	0878	ICC200107-13			7	0.00	0.00	0.00	
	ICC200107-13 Total							150,000.00	15,000.00	165,000.00	4

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Policy No: ICC200116-13 Limits (Occ/Agg): \$1M/\$2M	0942	Injured Party		ICC200116-13		19,345.00	3	19,500.00		19,500.00	
				ICC200116-13 Total				19,500.00	0.00	19,500.00	4
Policy No: ICC200217-13 Limits (Occ/Agg): \$1M/\$2M	1544	Injured Party		ICC200217-13		150,000.00	3	45,000.00		45,000.00	
				ICC200217-13 Total				45,000.00	0.00	45,000.00	4
Policy No: ICC200268-13 Limits (Occ/Agg): \$1M/\$2M	2675	Insured		ICC200268-13			3	0.00	0.00	0.00	
				ICC200268-13 Total				0.00	0.00	0.00	4
Policy No: ICC200281-13 Limits (Occ/Agg): \$1M/\$2M	0459	Injured Party	0459	ICC200281-13		1,000,000.00	3			0.00	
	1558	Insured	0459	ICC200281-13			3	500,000.00	15,000.00	515,000.00	
				ICC200281-13 Total				500,000.00	15,000.00	515,000.00	4