

CAUSE NO. D-1-GV-12-001713

THE STATE OF TEXAS

§

IN THE DISTRICT COURT OF

VS.

§

TRAVIS COUNTY, TEXAS

§

GRAMERCY INSURANCE COMPANY

§

53RD JUDICIAL DISTRICT

§

APPLICATION TO APPROVE NOTICE AND SET CLAIMS FILING DEADLINE

TO THE HONORABLE JUDGE OF SAID COURT:

Comes now Resolution Oversight Corporation, Special Deputy Receiver of Gramercy Insurance Company, in Receivership (the “SDR” and “Gramercy” respectively), and files its *Application to Approve Notice and Set Claims Filing Deadline* (the “Application”).

I. INTRODUCTION

1.1 The SDR requests authority to provide notice of the liquidation of Gramercy, to establish a deadline by which all claims must be filed (“Claims Filing Deadline”), and to approve the form of the proof of claim (“POC”).

II. BACKGROUND

2.1 On December 4, 2012, this Court entered an *Agreed Order Appointing Rehabilitator and Permanent Injunction*, placing Gramercy into receivership and appointing the Texas Commissioner of Insurance as Rehabilitator of Gramercy. Resolution Oversight Corporation (“ROC”) has been appointed SDR since December 5, 2012. On August 26, 2013, this Court entered an *Order Appointing Liquidator and Permanent Injunction*, placing Gramercy in liquidation and appointing the Commissioner as Liquidator of Gramercy (the “Liquidation Order”).

2.2 The Commissioner designated Gramercy an “impaired insurer” under TEX. INS. CODE Chapter 462, effective August 26, 2013. The Texas Property and Casualty Insurance Guaranty Association (“TPCIGA”) and guaranty associations in 36 other states (collectively, the

“Affected IGAs”) are now responsible for “covered claims” in accordance with their states’ governing statutes.

III. JURISDICTION AND AUTHORITY

3.1 This Court has exclusive jurisdiction over the subject matter of this Application pursuant to TEX. INS. CODE § 443.005.

3.2 The SDR is authorized to file this Application pursuant to TEX. INS. CODE § 443.155, which provides for the notice of liquidation, and § 443.251, which provides requirements for the filing of claims.

3.3 This Application has been referred to the Master appointed in this proceeding in accordance with the Supplemental Order of Reference to Master entered on August 26, 2013.

IV. STATUTORY REQUIREMENTS

4.1 TEX. INS. CODE § 443.155 specifies the categories of persons who must receive notice of liquidation, the means for providing the notice, and the contents of the notice. Unless this Court otherwise directs, TEX. INS. CODE § 443.155(a) requires that notice shall be given as follows:

- (1) By first class mail or electronic communication to:
 - A. any guaranty association that is or may become obligated as a result of the liquidation and any national association of guaranty associations;
 - B. all the insurer’s agents, brokers, or producers of record with current appointments or current licenses to represent the insurer, and all other agents, brokers, or producers as the liquidator deems appropriate at their last known address; and
 - C. all persons or entities known or reasonably expected to have claims against the insurer, at their last known address as indicated by the records of the insurer, and all state and federal agencies with an interest in the proceeding; and
- (2) By publication in a newspaper of general circulation in the county in which the insurer has its principal place of business and in any other locations as the Liquidator deems appropriate.

4.2 TEX. INS. CODE § 443.155(b) provides that the notice must contain (or provide directions for obtaining) specified information. In summary, this information includes:

- (1) a statement that the insurer has been placed into liquidation;
- (2) a statement that certain acts are stayed or enjoined;
- (3) whether, and to what extent, the insurer's policies continue in effect;
- (4) the coverage available by state insurance guaranty associations;
- (5) the claims filing deadline, and requirements for filing a POC;
- (6) the date, time, and location of any scheduled status hearings;
- (7) the process for obtaining notice of matters before this Court; and
- (8) any other information the SDR or this Court deems appropriate.

The form of the notice that will be provided in accordance with TEX. INS. CODE § 443.155(a) and (b) is attached as Exhibit 1 (the "Liquidation Notice").

V. LIQUIDATION NOTICE

5.1 Noticed Parties

The SDR shall provide the Liquidation Notice to the following parties:

a. Parties with Known Claims, and Parties Reasonably Expected to Have Claims:

1. Claimants with Policy and Contractual Losses

Notice will be provided to insureds, warranty, other contractual obligees, and third party claimants who reported claims that have not been resolved; any assignees or lienholders of record of such claims; and any counsel for such parties.

2. Potential Claimants

Each of Gramercy's Managing General Agencies ("MGAs") issued unique types of policies either in terms of coverage offered, geographic location, or length of the policy period. These variations dictate that different notice periods are required to provide the most cost effective notice for each program. Accordingly, the Liquidation Notice will be provided to all insureds of record by program as follows:

- A. Policies issued through the AmigoMGA, LLC. (“Amigo”)
Amigo is an MGA that issued six month, nonstandard auto policies in Texas, South Carolina, and Georgia. Claims tended to be reported very quickly after an accident. Amigo began running off the policies it issued through Gramercy in January, 2012. Because of the length of the policies, the swift claims reporting times, and the runoff, the SDR proposes to notice all insureds of record for the last year before cancellation.
- B. Policies issued through Atlantis Underwriters Insurance Group, Inc. (“Atlantis”)
Atlantis is an MGA that issued nonstandard auto policies in Texas. Most of the Atlantis policies were issued for periods of 90 days or less. Claims tended to be reported very quickly after an accident. This Court previously issued an order cancelling the Atlantis policies effective February 27, 2013. Because of the prior cancellation, the short policy periods, and swift claims reporting times, the SDR proposes to notice all insureds of record for the last six months before cancellation.
- C. Policies issued through Builder’s Risk
Gramercy issued the Builder’s Risk program through the internet. These policies were for periods of six months and one year. The policies covered new construction and remodeling of existing structures in numerous states. Because of the length of the policies, the reporting times, and potential exposure, the SDR proposes to notice all insureds of record for the last year before cancellation.
- D. Policies issued through AMWINs Group, Inc. (“AMWINs”)
AMWINs is an MGA that issued commercial auto policies, with one year terms, in all 37 states in which Gramercy was licensed. Because of the length of the policies and the reporting times, the SDR proposes to notice all insureds of record for the last year before cancellation.
- E. Policies issued through Global Guardian Insurance Program (“GGIP”)
GGIP is an MGA that issued commercial auto and private passenger policies to Mexican Nationals. These policies were issued for one year and only provided coverage when the vehicle was within 50 miles of the US border entry point. All of the policyholders live in Mexico. Because of the length of the policy period and the geographic location of the policyholders, the SDR proposes to notice all insureds of record for the two years before cancellation. Further, the SDR has translated the Liquidation Notice into Spanish exclusively for this program. The GGIP Liquidation Notice is attached hereto as Exhibit 2.

F. It is possible that some unreported claims may exist. If a new claim is reported by a person who has not been provided with a Liquidation Notice, the SDR will mail the notice to the claimant.

2. Policyholders due Unearned Premium

Policyholders who paid for coverage beyond the September 25, 2013, cancellation date have claims for unearned premiums. The SDR will send the Liquidation Notice to policyholders who had in-force policies as of September 25, 2013. There are also policyholders who are due unearned premium caused by early cancellations before the September 25, 2013, cancellation date. The SDR will send the Liquidation Notice to all of those policyholders as well.

3. General Creditors and Reinsureds

Notice will be provided to all vendors and service providers with unpaid invoices identified in Gramercy's accounts payable files since December 4, 2010, which is two years before the commencement of this proceeding. Notice will also be provided to Reinsureds with unresolved claims and those who paid for reinsurance coverage beyond the August 26, 2013, cancellation date.

4. Contractual Obligees

Notice will be sent to all contractual obligees who paid for coverage beyond the September 25, 2013, cancellation date, of their right for a refund of their payments due to the early termination of their contractual protection.

b. Governmental Agencies and Guaranty Associations:

1. Insurance commissioners of states in which Gramercy was licensed;
2. Affected IGAs and the National Conference of Insurance Guaranty Associations; and
3. The Internal Revenue Service.

c. Other Parties:

1. Agents, brokers, administrative obligors, or producers of record with recent appointments;
2. Gramercy's former owners, officers and directors, and shareholders;
3. Financial institutions which held Gramercy accounts;

4. Reinsurers of Gramercy; and
5. Any other parties who request, in writing, an opportunity to file a claim.

5.2 First Class Mail or Electronic Notice

The SDR proposes to give notice of the liquidation and Claims Filing Deadline to the parties identified in Paragraph 5.1 by first class mail or e-mail. The SDR will provide notice to the parties at their last known address as shown by Gramercy's records available to the SDR, or any forwarding address provided to the SDR. Some information in Gramercy's records is not current. TEX. INS. CODE § 443.155(d) provides that the SDR has no duty to locate a person if the person's address is not found in Gramercy's records, or if the mail to the address listed in Gramercy's records is returned as undeliverable. In such circumstances, the required notice by publication described in Paragraph 5.3 is sufficient.

The SDR requests that this Court approve the manner of notice and the categories of recipients as described above. In accordance with TEX. INS. CODE § 443.155(d), the SDR further requests that this Court find the mailing or emailing of notice in such manner constitutes prima facie evidence of receipt by the recipient to whom the notice is addressed, upon certification by the SDR that the notices were deposited, postage paid, in the U.S. Mail, or that the notices have been electronically transmitted.

5.3 Notice by Publication

Unless otherwise permitted by this Court, TEX. INS. CODE § 443.155(a)(2) requires notice by publication in a newspaper of general circulation in the county of Gramercy's principal place of business, and other locations as the SDR deems appropriate. The SDR proposes to publish a notice providing information about the claims filing process, guaranty association coverage and other matters regarding the receivership (the "Publication Notice"). The Publication Notice will appear at least once in newspapers of general circulation in Dallas, Texas and Atlanta, Georgia,

where Gramercy held principal business offices. SDR will also publish the Publication Notice at least once in newspapers in general circulation where Gramercy was licensed to sell insurance in the following additional cities: Birmingham, Alabama; the Miami/ Ft. Lauderdale area, Tampa, Jacksonville and Orlando, Florida; Chicago, Illinois; New Orleans and Baton Rouge, Louisiana; the Minneapolis/St. Paul, Minnesota area; Jackson, Mississippi; Allentown, Bethlehem and Philadelphia, Pennsylvania; and Houston, Harlingen, McAllen, El Paso and Laredo, Texas. The SDR will also publish the Publication Notice at least once in the USA Today, which has national circulation. The publications will give unknown creditors notice of the liquidation and Claims Filing Deadline. Pursuant to TEX. INS. CODE § 443.155(d) such notice by publication is sufficient notice to a person, if the person's address is not found in Gramercy's records or if a mailing to the person's address shown in Gramercy's records is returned as undeliverable. The SDR requests this Court to approve the Publication Notice attached as Exhibit 3, or a form that is substantially similar.

5.4 Internet Notice

In order to facilitate communication with claimants and other interested persons, the SDR proposes to post all notices, claims filing information, POC forms, and other relevant information on the SDR's website at www.gicreceivership.com. Links to the SDR's website will be posted on the Texas Department of Insurance website.

5.5 Proof of Claim Form

TEX. INS. CODE § 443.155 requires that a POC be in a form designated by the SDR, and TEX. INS. CODE § 443.252, contains requirements for the form of the POC. The SDR proposes to use the POC form attached to this Application as Exhibit 4. The SDR requests this Court to approve the POC form attached as Exhibit 4, or a form that is substantially similar. Also, for the reasons set forth in Section 5.1(a)(2)(E), the SDR has translated the POC form exclusively for

the GGIP policyholders to Spanish. The SDR requests this Court to approve the GGIP POC form attached as Exhibit 5, or a form that is substantially similar.

VI. CLAIMS

6.1 Claims Filing Deadline

In accordance with TEX. INS. CODE § 443.155, this Court shall specify a period of time within which all POCs must be filed. The SDR requests that this Court set a Claims Filing Deadline of February 26, 2015, which is eighteen months after the entry of the Liquidation Order, requiring that all POCs be received at the address designated by the SDR on or before 11:59 p.m. C.S.T. on that date. The Claims Filing Deadline corresponds with the deadline for filing claims against TPCIGA and a number of other Affected IGAs.

6.2 Referral of Covered Claims

The SDR shall refer all claims that may be “covered claims” to the respective Affected IGA for consideration. If a claim is fully covered by an Affected IGA, the SDR will advise the claimant that the claim will not be processed as a claim against the receivership estate in accordance with TEX. INS. CODE § 443.253(m).

6.3 Guaranty Association Claims

Affected IGAs will have claims for certain expenses and claims payments. TEX. INS. CODE § 443.252(d) provides that a guaranty association may submit a single POC combining all claims and related administrative expenses.

6.4 Processing Claims

The SDR will process POCs for claims with a priority of Class 1 and Class 2 under TEX. INS. CODE § 443.301(a) and (b) in the manner specified in TEX. INS. CODE § 443.253. The SDR will not process claims with a priority of Class 3 or lower pursuant to TEX. INS. CODE § 443.253(k) until the SDR reasonably believes that there may be sufficient assets to pay all

Class 2 claims in full. The SDR proposes that for all claims classified with a priority of Class 3 or lower, it will notify the claimant of the classification, and take no further action. The claimant will have an opportunity to object to the determination of the classification pursuant to TEX. INS. CODE § 443.253(c). If the SDR determines that there will assets available for distribution to claims with a priority of Class 3 or lower, the SDR will process those claims with respect to their amount and the claimant will have an opportunity to object to the determination of the amount under TEX. INS. CODE § 443.253(c).

6.5 Late Claims

TEX. INS. CODE § 443.251(b) authorizes the SDR to treat a late POC as if it was not filed late under certain circumstances. If a claimant meets these qualifications, the SDR will require an affidavit to verify the claimant's eligibility. Any POCs filed after the Claims Filing Deadline that do not qualify under TEX. INS. CODE § 443.251(b) will be classified as Class 8 claims under TEX. INS. CODE § 443.301(h).

6.6 Waiver and Release of Claims against Gramercy Insureds

In accordance with TEX. INS. CODE § 443.256(h), by filing a POC, a claimant asserting a third-party claim against a policyholder of Gramercy, shall be deemed to have released and waived such claim up to the amount of policy limits of the insured's policy. The POC forms attached as Exhibit 4 and Exhibit 5 contain the notice of this election of remedies as required by TEX. INS. CODE § 443.256(h)(4).

VII. NOTICE

7.1 The SDR has served this Application to all known parties at interest and all individuals and entities identified by the SDR in the Certificate of Service by e-mail and, as noted, by mail or overnight delivery to certain state and federal agencies.

7.2 All pleadings filed in response to this Application shall be served by e-mail on the undersigned counsel and all parties shown in the attached Certificate of Service.

VIII. OFFER OF PROOF

8.1 The Affidavit of Ernesto Garza is attached as Exhibit 6 and is offered as evidence to support this Application. The SDR represents to the Court that the proposed notices, POC forms, and categories of parties for notice are in the best interests of the Gramercy estate, its policyholders, creditors, and obligations imposed by Chapter 443 of the Texas Insurance Code.

PRAYER

WHEREFORE, PREMISES CONSIDERED, the SDR prays that this Court:

1. Grant this Application;
2. Approve the notices attached as Exhibits 1, 2, and 3 and methods as described in this Application;
3. Approve the POC forms attached as Exhibit 4 and Exhibit 5;
4. Set February 26, 2015, as the Claims Filing Deadline for the filing of POCs; and
5. Grant the SDR such other and further relief to which it may be justly entitled.

Respectfully submitted,

STROUD, MARRERO & WELCH, PLLC
11824 Jollyville Road, Suite 200
Austin, Texas 78759
Telephone: 512/482-9291
Facsimile: 512/482-9211

By: /s/ Rachel J. Stroud

Rachel J. Stroud
State Bar No. 19424700

Mary Searcy Marrero
State Bar No. 13012800

Attorneys for the Special Deputy Receiver

APPLICANT'S NOTICE OF SUBMISSION

Pursuant to the terms of the Supplemental Order of Reference to Master entered by the District Court in this cause, the SDR's *Application to Approve Notice and Set Claims Filing Deadline* is hereby set for written submission before the Special Master, Tom Collins, on **Monday, February 17, 2014**.

The Special Master has established the following rules pursuant to Rule 171 of the Texas Rules of Civil Procedure:

1. Any objection must be filed with the Travis County District Clerk at least three (3) calendar days before the submission date.
2. A copy of any objection shall be served by email by such date on:
 - (a) The Special Master's Docket Clerk at specialmasterclerk@tdi.texas.gov;
 - (b) The undersigned counsel, Rachel Stroud at rstroud@stroudmarrerowelch.com; and
 - (c) All interested parties, including those listed on the Applicant's Certificate of Service.
3. The written objection must specifically list all reasons for objection with supporting references to and discussion of statutory and case authorities. Reasons not stated in writing will not be considered orally.
4. If a matter is set for submission, an objecting party shall expeditiously coordinate with Applicant's counsel and the special master's docket clerk (specialmasterclerk@tdi.texas.gov) to obtain an oral hearing, unless the master determines that an oral hearing is not necessary. The objecting party shall serve a Notice of Oral Hearing on applicant's counsel and all interested parties, including those listed on the Applicant's Certificate of Service.
5. Failure to file timely a written objection before the Special Master constitutes a waiver of the right to object to the Special Master's recommendation to the District Court.
6. Any Acknowledgment of Notice and Waiver to be filed by a Guaranty Association or other interested party should be filed at least three (3) calendar days before the submission or hearing date.

/s/ Rachel J. Stroud

Rachel J. Stroud

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served on all interested parties in accordance with the Texas Rules of Civil Procedure and TEX. INS. CODE ANN. § 443.007(d) this 30th day of January, 2014.

Mr. Tom Collins, Special Master
Texas Department of Insurance
333 Guadalupe, Tower III, 5th Fl., MC-305-1D
Austin, Texas 78701
Email: specialmasterclerk@tdi.texas.gov

Ms. Kathy Gartner
Ms. Kimberly Hammer
Texas Department of Insurance
P.O. Box 149104
Austin, Texas 78714
Email: kathy.gartner@tdi.texas.gov
Email: kimberly.hammer@tdi.texas.gov

Ms. H. Melissa Mather, Asst. Attorney General
Attorney General's Office
P.O. Box 12548
Austin, Texas 78711-2548
Email: HMelissa.Mather@texasattorneygeneral.gov

Ms. Sharon Williams
Mr. Victor W. Zhao
United States Department of Justice
P.O. Box 875, Ben Franklin Station
Washington, DC 20044-0875
Via Email: sharon.williams@usdoj.gov
Via Email: victor.w.zhao@usdoj.gov

Ms. Denise Azar, Chief Receiver
Alabama Department of Insurance
P.O. Box 303353
Montgomery, AL 36130-3353
Email: Denise.Azar@insurance.alabama.gov

Mr. Steve Uhrynowycz, Deputy Receiver
Arkansas Insurance Department
Arkansas Property & Casualty Guaranty Fund
1023 West Capitol Avenue
Little Rock, AR 72201
Email: Steve.Uhrynowycz@arkansas.gov

Ms. Leslie R. Hess, Financial Affairs Division
Arizona Department of Insurance
2910 N. 44th St. Suite 210
Phoenix, AZ 85018-7269
Email: lhess@azinsurance.gov

Mr. Scott Lloyd
Colorado Division of Insurance
1560 Broadway, Suite 850
Denver, CO 80202
Email: scott.lloyd@dora.state.co.us

Ms. Linda Sizemore
Delaware Insurance Department
841 Silver Lake Blvd
Dover, DE 19904
Email: Linda.Sizemore@state.de.us

Ms. Sha'Ron James, Director
Mr. Bob Elias
Division of Rehabilitation & Liquidation
Florida Department of Financial Services
2020 Capital Circle SE, Alexander Bldg Ste 340
Tallahassee, FL 32301-0110
Email: ShaRon.James@myfloridacfo.com
Email: Bob.Elias@myfloridacfo.com

Mr. Mark Ossi, Deputy Division Director
Georgia Insurance Department
2 Martin Luther King, Jr. Dr., Ste 610
Atlanta, GA 30334
Via Email: mossi@oci.ga.gov

Mr. Jim Armstrong
Iowa Insurance Division
330 Maple St.
Des Moines, IA 50319-0065
Email: Jim.Armstrong@iid.iowa.gov

Ms. Georgia Siehl, Bureau Chief/Chief Examiner
Idaho Department of Insurance
P.O. Box 83720
Boise, ID 83720-0043
Email: georgia.siehl@doi.idaho.gov

Mr. Paul A. Miller, Office of the SDR
Illinois Department of Insurance
222 Merchandise Mart Plaza, Ste 960
Chicago, Illinois 60654
Email: pmiller@osdchi.com

Ms. Elizabeth Lovette
Indiana Department of Insurance
311 West Washington St.
Indianapolis, IN 46204-2787
Email: Liz@in-solv.com

Mr. Ken Abitz, Dir-Financial Surveillance Div
Kansas Department of Insurance
420 SW 9th Street
Topeka, Kansas 66612-1678
Via Email: kabitz@ksinsurance.org

Ms. Sharron Burton, General Counsel
Kentucky Office of Insurance
215 W. Main St.
Frankfort, Kentucky 40601
Email: Sharron.Burton@ky.gov

Mr. Allan Pursnell, Deputy Commissioner
Mr. Barry Karns, Receiver
Louisiana Department of Insurance
P.O. Box 94214
Baton Rouge, LA 70802
Email: apurnell@ldi.state.la.us
Email: barryk@ldi.state.la.us

Lynn Beckner, Chief Financial Analyst
Maryland Insurance Administration
200 St. Paul Place, Suite 2700
Baltimore, MD 21202
Email: lynn.beckner@maryland.gov

Ms. Sue Porter
Minnesota Department of Commerce
85 7th Place East, Suite 500
St. Paul, MN 55101
Email: sue.porter@state.mn.us

Ms. Diane Garber
Missouri Department of Insurance
PO Box 690
Jefferson City, MO 65102-0690
Email: Diane.Garber@insurance.mo.gov

Ms. Donna Whitley
Mississippi Department of Insurance
501 North West St
Jackson, MS 39201
Email: donna.whitley@mid.state.ms.us

Mr. Steve Matthews, Insurance Division
Montana State Auditor's Office
840 Helena Ave.
Helena, MT 59601
Email: smatthews@mt.gov

Mr. Raymond Martinez, Sr. Deputy Commissioner
Mr. Rick Kilpatrick, Sr. Regulatory Specialist
North Carolina Department of Insurance
401 Glenwood Avenue
Raleigh, NC 27603
Via Email: ray.martinez@ncdoi.gov
Via Email: rick.kilpatrick@ncdoi.gov

Mr. Edward Moody
North Dakota Insurance Department
1701 South 12th Street
Bismarck, ND 58504
Email: emoody@nd.gov

Ms. Peggy Jasa
Nebraska Department of Insurance
941 "O" Street, Suite 400
Lincoln, NE 68508-3639
Email: peg.jasa@nebraska.gov

Mr. Mickey VanCuren, Deputy Superintendent
New Mexico Insurance Division
P.O. Box 1269
Santa Fe, NM 87504-1269
Email: mickey.vancuren@state.nm.us

Ms. Peggy Willard-Ross, Chief Ins Examiner
Mr. Lin Riipo
Nevada Division of Insurance
1818 E. College Pkwy., Suite 103
Carson City, Nevada 89706
Email: pwillard@doi.nv.gov
Email: lriipi@doi.nv.gov

Mr. Kelley Callahan, Asst. General Counsel
Oklahoma Department of Insurance
2401 N.W. 23rd, Suite 28
Oklahoma City, OK 73152-3408
Via Email: kelley.callahan@oid.ok.gov

Mr. Russell Latham, Manager/Chief Examiner
Oregon Division of Insurance
PO Box 14480
Salem, OR 97309-0405
Email: arussell.latham@state.or.us

Ms. Judith K. Anderson (OR Ancillary Receiver)
Attorney – Dept. of Justice
1162 Court Street NE
Salem, OR 97301-4096
Email: judith.k.anderson@doj.state.or.us

Ms. Laura Slaymaker, Liquidations Project Dir.
Pennsylvania Department of Insurance
901 North 7th Street
Harrisburg, PA 17102
Email: c-lslaymak@state.pa.us

Mr. Lee Hill, Chief Financial Analyst
South Carolina Department of Insurance
1201 Main Street, Suite 1000
Columbia, SC 29201
Via Email: lhill@doi.sc.gov

Ms. Johanna Nickelson
South Dakota Division of Insurance
445 East Capitol Avenue
Pierre, SD 57501
Email: Johanna.Nickelson@state.sd.us

Mr. Bob Ribe, Insurance Division
Tennessee Dept. of Commerce & Insurance
500 James Robertson Pkwy., 4th Fl.
Nashville, TN 37243
Email: Bob.Ribe@tn.gov

Mr. Todd Kiser, Deputy Commissioner
Utah Insurance Department
3110 State Office Building
Salt Lake City, UT 84114-6901
Email: toddkiser@utah.gov

Mr. Greg Yeatts
Virginia Bureau of Insurance
P.O. Box 1157
Richmond, Virginia 23218
Email: Gregory.Yeatts@scc.virginia.gov

Mr. James T. Odiorne, Deputy Commissioner
Washington Office-Ins Commissioner
5000 Capitol Boulevard
Tumwater, WA 98501
Email: jimo@oic.wa.gov

Ms. Gina Frank
Wisconsin Office-Ins Commissioner
P.O. Box 7873
Madison, WI 53707-7873
Email: gina.frank@wisconsin.gov

Ms. Leah Cooper
West Virginia Insurance Commission
P.O. Box 50540
Charleston, WV 25305-0540
Email: Leah.Cooper@wvinsurance.gov

Ms. Stephanie B. McGee, Deputy Ins Commissioner
Wyoming Insurance Department
East 122 West 25th Street, 3rd Fl.
Cheyenne, WY 82002
Email: smcgee@state.wy.us

Ms. Barbara Cox
The Nat'l Conference of Insurance Guaranty Funds
300 North Meridian St., Suite 1020
Indianapolis, IN 46204
Via Email: bcox@ncigf.org

Mr. Paul M. Gulko
Guaranty Fund Management Services
One Bowdoin Square
Boston, MA 02114-2916
Email: pgulko@gfms.org

Mr. David C. Edwards
Western Guaranty Fund Services
1720 South Bellaire Street, Suite 408
Denver, CO 80222
Email: dedwards@wgfs.org

Ms. Betty S. Davis, Executive Director
Alabama Insurance Guaranty Association
2020 Canyon Road, Suite 200
Birmingham, AL 35216
Email: aiga01@bellsouth.net

Mr. Michael E. Surguine, Executive Director
Arizona Insurance Guaranty Funds
1110 West Washington, Suite 270
Phoenix, AZ 85007
Email: msurguine@azinsurance.gov

Mr. John J. Falkenbach, Executive Director
Delaware Insurance Guaranty Association
220 Continental Drive, Suite 309
Newark, DE 19713
Email: jfalkenbach@deiga.com

Ms. Sandra J. Robinson
American Guaranty Fund Group
Florida WC Insurance Guaranty Association
Florida Insurance Guaranty Association
P.O. Box 15159
Tallahassee, FL 32317-5159
Email: srobinson@agfgroup.org

Mr. Michael C. Marchman, Executive Director
Georgia Insurers Insolvency Pool
2177 Flintstone Drive, Suite R
Tucker, GA 30084
Email: mmarchman@gaiga.org

Ms. Anne A. Sharp, Executive Director
Illinois Insurance Guaranty Fund
120 South LaSalle Street, Suite 1910
Chicago, IL 60603
Email: Asharp@IIGF.org

Ms. Janis B. Funk, Executive Director
Indiana Insurance Guaranty Association
251 East Ohio Street, Suite 1070
Indianapolis, IN 46204-2143
Email: jfunk@quadassoc.org

Mr. Steven Augspurger, General Counsel
Iowa Insurance Guaranty Association
801 Grand Avenue, Suite 3700
Des Moines, IA 50309-8004
Email: augspurger.steven@bradshawlaw.com

Mr. A. Scott Webster, Executive Director
Kentucky Insurance Guaranty Association
10605 Shelbyville Road, Suite 101
Louisville, KY 40223
Email: scott.webster@kyinsuranceguaranty.com

Mr. John Wells, Director of Operations & Logistics
Louisiana Insurance Guaranty Association
2142 Quail Run Drive
Baton Rouge, LA 70808-4126
Email: jwells@laiga.org

Mr. Joseph R. Petr, Executive Vice President
MD Property & Casualty Ins. Guaranty Corp.
305 Washington Avenue, Suite 600
Towson, MD 21204-4715
Email: jpetr@pcigc.com

Mr. Paul Steffen, Executive Director
Minnesota Insurance Guaranty Association
7600 Parklawn Avenue, Suite 460
Edina, MN 55435
Email: psteffen@poppp.net

Mr. Arthur Russell, Executive Director
Ms. Rhonda Powell
Mississippi Insurance Guaranty Assn.
713 South Pear Orchard Road, Suite 401
Ridgeland, MS 39157-5004
Via Email: arussell@msiga.net
Via Email: rpowell@msiga.net

Mr. Charles F. Renn, Executive Director
Missouri Property & Casualty Ins Guaranty Assoc
Missouri Life & Health Insurance Guaranty Assoc
994 Diamond Ridge, Suite 102
Jefferson City, MO 65109
Email: crenn@mo-iga.org

Mr. L. Dean Fletcher, Administrator
Nebraska Property & Liability Ins Guaranty Assoc
P.O. Box 57006, Station C
Lincoln, NE 68505
Email: ldf3436p@aol.com

Mr. Bruce W. Gilbert, Executive Director
Nevada Insurance Guaranty Association
3821 West Charleston Boulevard, Suite 100
Las Vegas, NV 89102-1859
Email: bgilbert@niga-pc.org

Mr. Gary M. Keenan, Fund Administrator
Ms. Vanessa Ramirez
New Mexico Insurance Guaranty Association
Keenan & Associates, Inc. P.O. Box 14590
Albuquerque, NM 87191-4590
Email: gkeenan@keen-an-assoc.com
Email: vramirez@keen-an-assoc.com

Mr. Raymond F. Evans, Managing Secretary
Mr. Mike Newton
North Carolina Insurance Guaranty Association
P.O. Box 176010
Raleigh, NC 27619-6010
Email: rfe@ncrb.org
Email: rmn@ncrb.org

Mr. Jeffry J. Cahill, Managing Secretary
North Dakota Insurance Guaranty Association
P.O. Box 2634
Bismarck, ND 58502-2634
Email: jsc46@bis.midco.net

Mr. Larry W. Fitch, General Manager
OK Property & Casualty Ins. Guaranty Assoc.
2601 Northwest Expressway, Suite 330E
Oklahoma City, OK 73112
Email: lwfitch@opciga.org

Mr. David C. Johnson, Administrator
Oregon Insurance Guaranty Association
10700 Southwest Beaverton Hwy, Suite 426
Beaverton, OR 97005
Email: djohnson.oiga@frontier.com

Mr. Stephen Perrone, Executive Director
PA Property & Casualty Ins Guaranty Assoc
1617 John F. Kennedy Blvd., Suite 1850
Philadelphia, PA 19103
Email: sperrone@ppciga.org

Ms. Laura S. Keller, Claims Manager
Pennsylvania WC Security Fund
Pennsylvania Ins Dept Bureau of Special Funds
901 North 7th Street
Harrisburg, PA 17102
Email: lakeller@state.pa.us

Mr. J. Smith Harrison, Exec. Director/Secretary
SC Property & Casualty Ins Guaranty Assoc
P.O. Box 407
Columbia, SC 29202
Email: smitty@scwind.com

Mr. Edwin F. Evans
SD Property & Casualty Ins Guaranty Assoc
Davenport, Evans, Hurwitz & Smith
P.O. Box 1030
Sioux Falls, SD 57101-1030
Email: eevans@dehs.com

Mr. David Broemel, Executive Secretary
Ms. Ivi Niemann
Tennessee Insurance Guaranty Association
1600 Division Street, Suite 680
Nashville, TN 37203
Email: dbroemel@bakerdonelson.com
Email: iniemann@tiga.net

Ms. Linda Meltzer
Mr. Jessie Bowie
Ms. Teri Rodriguez
Texas Property & Casualty Ins Guaranty Assoc
9120 Burnet Road
Austin, TX 78758
Email: lmeltzer@tpciga.org
Email: jbowie@tpciga.org
Email: trodriguez@tpciga.org

Mr. Allen Muhlestein, Executive Director
Utah Property & Casualty Ins. Guaranty Assoc.
P.O. Box 1626
Sandy, UT 84091-1626
Email: allenm@utgf.org

Mr. Randy Blumer, Executive Director
Wisconsin Insurance Security Fund
2820 Walton Commons West, Suite 135
Madison, WI 53718-6797
Email: randy@wisf-madison.org

Ms. Molly Levinson, Enforcement Atty
State of Georgia
Office of Insurance & Safety Fire Commissioner
Suite 620, West Tower
2 Martin Luther King, Jr. Drive
Atlanta, Georgia 30334
Email: MLevnson@oci.ga.gov

Mr. Jack M. Cleaveland Jr. (Atty for Topdanmark)
Thompson Coe Cousins & Irons, L.L.P.
700 N. Pearl St., 25th Floor
Dallas, TX. 75201
Email: jcleaveland@thompsoncoe.com

Ms. Wendy Pellow, Assistant General Counsel
Texas Department of Licensing and Regulation
920 Colorado
Austin, Texas 78701
Email: wendy.pellow@tdlr.texas.gov

Mr. Rehmat Peerbhai
Atlantis Underwriters
1250 S. Capital of Texas Hwy., Bldg 1, Suite 550
Austin, Texas 78746
Email: ray@amcousa.com

Stonebriar Financial Services Partners, LLC
c/o C T Brandt
3650 Schooner Ridge
Alpharetta, GA 30005
Email: tdnarbmot@gmail.com

Mr. Patrick Burke
Trafalgar Group
P.O. Box 346
Cave Spring, GA 30124
Email: pburke@trafgroup.com

Mr. Clive Seymour (Atty – Peak Acceptance)
Hall Estill
320 S. Boston Ave., Suite 200
Tulsa, OK 74103
Email: Cseymour@HallEstill.com

Ms. Leila Persaud
Insurance Services Office
545 Washington, Blvd., 12th Floor
Jersey City, NJ 07310-1686
Email: LPersaud@iso.com

Ms. Darleen Nicole Sheppard
4224 Canal Street
New Orleans, LA 70119
504-234-4880
Email: sheppardlaw@yahoo.com

Mr. Julius Gernes (Atty for Acuity)
Donna Law Firm, P.C.
7601 France Ave S, Ste 350
Minneapolis, MN 55435
Email: jgernes@donnalaw.com

Mr. Scott M. Newmark (Atty for Helen Wilcox)
Carnar & Barzakay, LLC
600 S. Andrews Ave., Suite 301
Ft. Lauderdale, FL 33301
Email: smn@carnarbarzakay.com

Mr. Aaron G. Koury
Carpenter & Schumacher, P.C.
Parkway Centre IV
2701 N. Dallas Parkway, Ste. 570
Plano, Texas 75093
Email: akoury@subrogatelaw.com

Ms. Julie Pomerantz
Mitchell, Williams, Selig, Gates
& Woodyard, P.L.L.C.
106 East Sixth Street, Suite 300
Austin, Texas 78701
Email: jpomerantz@mwlaw.com

Ms. Eryn Brasovan
Ms. Jennifer Lang
FIRST Insurance Funding Corp.
450 Skokie Blvd., Suite 1000
Northbrook, IL 60062
Email: eryn.brasovan@firstinsurancefunding.com
Email: jennifer.lang@firstinsurancefunding.com

Mr. Jeffrey S. Hammer
Alvarez Sambol Winthrop
100 S. Orange Ave.
Orlando, FL 32801
Email: jhammer@aswpa.com

Mr. Mitchell L. Ginsburg
Wayne Wright LLP
1524 S. Interstate 35, Suite 100
Austin, Texas 78704
Email: mginsburg@waynewright.com

Mr. Jeff Scriber
324 South Main Street
Jonesboro, AK 72401
Email: scriberfirm@gmail.com

Mr. Frank Medina
Law Offices of Francisco G. Medina
1111 North Loop West, Suite 820
Houston, TX 77008
Email: fgm@medinalaw.net

Ms. Glenda M. August
Glenda M. August & Associates
129 West Pershing Street
New Iberia, LA 70560
Email: gaalaw@aol.com

Mr. R. Sean McEvoy
Casey Gilson P.C.
Six Concourse Parkway, Suite 2200
Atlanta, GA 30328
Email: Rsm@caseygilson.com

Mr. Jason Powers
Law Office of Levin & Clinebell, employees of
Government Employees Insurance Company
50 Briar Hollow Ln., Suite 505W
Houston, TX 77027
Email: CHeds@geico.com

Mr. Robert McCracken
Roush McCracken Guerrero, LLP
1190 East Missouri Avenue, Suiet 190
Phoenix, AZ 85014
Email: bob@rmglaw.com

Mr. Mark D. Bradshaw
The Bradshaw Hogle Firm
1013 South Stapley Dr.
Mesa, AZ 85204
Email: mark@bradshawhogle.com

Romney Player
Knight Transportation
5601 W. Buckeye Rd.
Phoenix, AZ 85043
Email: Romney.Player@knighttrans.com

David Crawford
David Crawford, P.A.
One North Marshall Street
Winston-Salem, NC 27101
Email: dr Crawfordpa@aol.com

Maribel Ingram
Monique Raicovich
ETI Financial Corp
P.O. Box 829522
Pembroke Pines, FL 33082-9522
Email: Maribel@etifinance.com
Email: Monique@etifinance.com

Ms. Pam Mims
Assistant General Counsel
AmWINS Group, Inc.
4725 Piedmont Row Dr., Suite 600
Charlotte, NC 28210
Email: Pamela.Mims@amwins.com
Email: Diane.Gibides@amwins.com

Mr. Ian M. Leifer
Mid-Century Ins Co
P.O. Box 268994
Oklahoma City, OK 73126-8994
Email: ian.leifer@hpcs.com

Mr. Robert Duke
The Surety & Fidelity Association of America
1101 Connecticut Ave., NW
Suite 800
Washington, D.C. 20036
Email: RDuke@surety.org

Mr. Anthony Icenogle
Icenogle & Sullivan PLLC
6805 Capital of Texas Hwy., North
Suite 220
Austin, Texas 78731
Email: Aicenogle@icesully.com

Mr. Chester Powell
The Hartford P&C Claim
Central Recovery Operation
P.O. Box 14272
Lexington, KY 40512-4272
Email: chester.powell@thehartford.com

Ms. Michele Barnes
Motors Insurance Corp.
P.O. Box 105706
Atlanta, GA 30348
Email: Michele.Barnes@ally.com

Ms. Dawn Grasso
Lazer Spot
6525 Shiloh Road, Suite 900
Alpharetta, GA 30005
Email: dgrasso@lazerspot.com

Ronald W. Parnell
The Law Office of Ronald W. Parnell, PC
P.O. Box 81085
Conyers, GA 30013
Email: rwparnell@subrogator.com

Edward Michel
David Tippet
Legal Department, Section 47
State of LA Dept of Transportation and Development
P.O. Box 94245
Baton Rouge, LA 70804-9984
Email: Ed.Michael@LA.GOV
Email: David.Tippet@LA.GOV

Sharon A. Lavelle
Georgia Farm Bureau
P.O. Box 7777
Macon, GA 31209-7777
Email: salavelle@gfb.org

Ms. Lisa Chastain
Law Office of Driskell & Wright
105 Decker Drive, Suite 150
Irving, TX 75062-2211
Email: CHASTAL1@nationwide.com

Ms. Kathryn K. Roberts
Mary A. Miller & Associates, LLC
3300 Holcomb Bridge Rd., Suite 100
P.O. Box 1588
Norcross, GA 30091-1588
Email: KRoberts@gasubro.com

Andrew C. Wright
Buck Keenan, LLP
700 Louisiana, Suite 5100
Houston, TX 77002
Email: wright@buckkeen.com

J.D. Smith
Ward Smith, PLLC
1000 Second Avenue, Suite 4050
Seattle, WA 98104-1023
Email: JD@WardSmithLaw.com

Damon A. Vespi
The Vespi Law Firm
547 Union Blvd.
Totowa, NJ 07512
Email: dvespi@vespilegal.com

Jennifer Meinerz
Northland Insurance Company
One Tower Square, MS05A
Hartford, CT 06183
Email: jmeinerz@Northlandins.com

Ms. Linda Maxwell
AmTrust North America
P.O. Box 650767
Dallas, TX 75265-0767
Email: Linda.Maxwell@amtrustgroup.com

Mr. Joe Rayzor
Great West Casualty Company
Attn: Claim G00034
2030 Falling Water Road, Ste 300
Knoxville, TN 37922
Email: j.rayzor@gwccnet.com

Ms. Vanessa Wade
Douglas, Knight & Associates, Inc
File Number: 172771
P.O. Box 10517
Bradenton, FL 34282
Email: vwade@douglasknight.com

Mr. John L. Thompson (Atty for Companion)
Munsch Hardt Kopf & Harr, P.C.
3800 Lincoln Plaza
500 N. Akard Street
Dallas, Texas 75201-6659
Email: jthompson@munsch.com

Ms. Monica Bickar
Sedgwick Claims Management Services, Inc.
5700 Lomardo Center
Rock Run North,
Seven Hills, OH 44131
Email: Monica.Bickar@sedgwickcms.com

Ms. Marie Harper
National Subrogation Services, LLC
100 Crossways Park West, Suite 415
Woodbury, NY 11797
Email: mharper@NationalSubrogation.com

Ms. Linda Kuusela
South Atlantic Insurance
Accounting Dept.
7551 Wiles Rd., Suite 201
Coral Springs, FL 33067
Email: linda@satlanticins.com

Ms. Julie Gannon
RIS Insurance Services
5922 NE Win Sivers Dr., Suite 105
Portland, OR 97220
Email: julieg@risnet.com

Ms. Rox-Anne Mulrenin
Ms. Lani Flanigan
Ms. Jacqueline Frost
Ms. Jennifer Pantelakos
CCS Commercial, LLC
P.O. Box 7249
Portsmouth, NH 03802-7249
Email: Rmulrenin@ccsusa.com
Email: LFlanigan@ccsusa.com
Email: JFrost@ccsusa.com
Email: JPantelakos@ccsusa.com

Ms. Elizabeth Weller
Linberger Goggan Blair & Sampson, LLP
2323 Bryan Street, Suite 1600
Dallas, Texas 75201
Email: Dallas.bankruptcy@lgbs.com

Ms. Mary McFaden
Legal Dept – Premium Assignment Corporation (A
Sun Trust Company)
P.O. Box 8800
Tallahassee, FL 32314-8800
Email: mary.mcfaden@suntrust.com

Mr. Bruce P. Mayer
Law Offices of Bruce Phillip Mayer
709 Knox Street
Houston, TX 77007
Email: brucemayer@sbcglobal.net

Mr. Ray Bauso
Pennsylvania Property & Casualty Guaranty Assoc
1617 John F. Kennedy Blvd., Suite 1850
Philadelphia, PA 19103
Email: Rbauso@ppciga.org

Mr. Rob Oliver
Sharpe & Oliver, L.L.P.
550 Westcott Street, Suite 230
Houston, TX 77007-5096
Email: mackknife@mackknife.net

Mr. Mark Solomon
Mr. Matthew Chaney
The Garner Law Firm
7660 Woodway Drive, Suite 390
Houston, TX 77063
Email: mark.solomon@texassubro.com
Email: matthew.chaney@texassubro.com

Mr. Hector De Leon (Attorney for Party in interest
Kemper Cost Management, Inc.)
De Leon & Washburn, P.C.
901 S. MoPac Expressway
Barton Oaks Plaza V, Suite 230
Austin, TX 78746
Email: hdeleon@dwlawtx.com

Mr. Brent Cole
Pilot Flying J
General Liability Claims Adjuster – Risk Mgmt
5508 Lonas Road
Knoxville, TN 37909
Email: Brent.Cole@pilottravelcenters.com

Mr. Dan Wilson
9307 Broadway, Suite 328
Pearland, TX 77584
Email: dan@hw-lawfirm.com

Mr. Jeff Reddall
Comerica Bank Building
One Sugar Creek Center Blvd., Suite 925
Sugar Land, Texas 77478
Email: jeff@reddall-law.com

Ms. Kaitlyn Graham
Subrogation Division, Inc.
136 South Main Street
Spanish Fork, Utah 84660
Email: Kaitlyn.Graham@subrodiv.com

Mr. Keith Miller
Miller Norman Law Office, Ltd.
403 Center Avenue
Moorhead, MN 56560
Email: klmiller@mnalaw.com

Mr. W. Shane Osborn
Javitch, Block & Rathbone, LLC
275 W. Campbell Road, Suite 450,
Richardson, Texas 75080

Mr. Vincent Carter
Travelers Insurance Company
P.O. Box 2954
Milwaukee, WI 53201-2954
Email: vcarter2@travelers.com

Mr. Dick Crnkovich
Imperial PFS
P.O. Box 220
Puyallup, WA 98371
Email: dick.crnkovich@ipfs.com

/s/ Rachel Stroud
Rachel Stroud
Email: rstroud@stroudmarrerowelch.com

EXHIBIT 1

**GRAMERCY INSURANCE COMPANY
NOTICE OF LIQUIDATION AND
DEADLINE TO FILE CLAIMS**

**FILING DEADLINE:
11:59 P.M. CST, FEBRUARY 26, 2015**

**THIS NOTICE PROVIDES IMPORTANT INFORMATION REGARDING
GRAMERCY INSURANCE COMPANY (“GRAMERCY”)**

Gramercy has been placed in receivership for liquidation.

On August 26, 2013, the 53rd Judicial District Court of Travis County, Texas entered an *Order Appointing Liquidator and Permanent Injunction*, placing Gramercy into liquidation under Chapter 443 of the Texas Insurance Code. The Court appointed the Texas Commissioner of Insurance as Liquidator. The Liquidator appointed Resolution Oversight Corporation, as the Special Deputy Receiver (“SDR”) of Gramercy.

Gramercy’s policies have been cancelled.

All insurance policies issued by Gramercy were cancelled no later than September 25, 2013, as required by the Texas Insurance Code. Notices of cancellation were previously provided to Gramercy’s policyholders of record.

Guaranty associations are paying “covered claims” under Gramercy policies.

If you have a claim under an insurance policy issued by Gramercy, you may have a “covered claim” that is payable by a state insurance guaranty association (“guaranty association”). Information regarding the Texas Property and Casualty Insurance Guaranty Association is available at www.tpciga.org and information about other states’ guaranty associations is available at www.ncigf.org/public/guarantyfunds.

Claims not paid by guaranty associations may be filed in the Gramercy receivership.

You may file a Proof of Claim (“POC”) in the Gramercy receivership for any amount due from Gramercy that is not covered, in whole or in part, by a guaranty association. **POCs must be received by the SDR no later than 11:59 p.m., CST on February 26, 2015.** POC forms may be obtained as follows:

Download:	www.gicreceivership.com
Request by e-mail:	cgarza@rocsdr.com
Request by telephone:	(210) 490-8808, Ext 1
Request by mail:	P.O. Box 2077, San Antonio, Texas 78297-2077

A litigation stay is in effect.

Lawsuits against Gramercy and persons insured by Gramercy are stayed under Texas Insurance Code §§ 443.008 and 462.309. Lawsuits in other states may also be stayed under applicable laws in those states.

Other information:

More information is available on the SDR’s website, www.gicreceivership.com, including:

- Answers to frequently asked questions about the receivership process;
- Documents filed in the receivership proceeding; and
- Notices of hearings and status conferences.

EXHIBIT 2

**GRAMERCY INSURANCE COMPANY
AVISO DE LIQUIDACIÓN Y
FECHA LÍMITE PARA PRESENTAR RECLAMACIONES
FECHA LÍMITE PARA PRESENTAR RECLAMACIONES:
11:59 P.M. 26 DE FEBRERO DE 2015, HORA DEL CENTRO**

**ESTE AVISO PROVEE INFORMACIÓN IMPORTANTE SOBRE
GRAMERCY INSURANCE COMPANY (“GRAMERCY”)**

Gramercy ha sido colocada en un proceso de administración judicial para su liquidación de bienes.

El 26 de agosto de 2013, el Juzgado de Distrito No. 53 del Condado de Travis, Texas, emitió una *Orden de Nombramiento de Síndico e Interdicto Permanente*, para colocar a Gramercy en proceso de liquidación de bienes, de conformidad con el Capítulo 443 del Código de Seguros de Texas (Texas Insurance Code, por su nombre en inglés). El Juzgado nombró al Comisionado de Seguros de Texas como Síndico. El Síndico nombró a Resolution Oversight Corporation, como Síndico Auxiliar Especial (Special Deputy Receiver -SDR, por su nombre y siglas en inglés) de Gramercy.

Las pólizas de Gramercy han sido canceladas.

Todas las pólizas de seguro que expidió Gramercy fueron canceladas a no más tardar del 25 de septiembre de 2013, según lo exige el Código de Seguros de Texas. Avisos de cancelación fueron previamente proporcionados a los asegurados que figuran en los registros de Gramercy.

Las asociaciones afianzadoras están pagando las “reclamaciones con cobertura” bajo las pólizas de Gramercy.

Si usted tiene una reclamación bajo una póliza de seguro que fue expedida por Gramercy, es posible que pueda tener una “reclamación con cobertura” que es pagable por parte de una asociación afianzadora estatal de seguros (state insurance guaranty association, por su nombre en inglés). La información sobre la Asociación Afianzadora de Seguros de Propiedad y Percances de Texas (Texas Property and Casualty Insurance Guaranty Association, por su nombre en inglés) está disponible en www.tpciga.org, y la información referente a las otras asociaciones afianzadoras estatales está disponible en www.ncigf.org/public/guarantyfunds

Las reclamaciones que no sean pagadas por las asociaciones afianzadoras pueden ser presentadas en la liquidación de bienes de Gramercy.

Usted puede presentar un Comprobante de Reclamación (Proof of Claim -POC, por su nombre y siglas en inglés) en la liquidación de bienes de Gramercy por cualquier cantidad que Gramercy deba que no esté cubierta, ya sea total o parcialmente, por una asociación afianzadora. **Los POC tienen que ser recibidos por SDR a no más tardar del 26 de febrero de 2015 a las 11:59 p.m., hora del centro.** Los formularios de POC se pueden obtener de la siguiente manera:

Descarga:	www.gicreceivership.com
Solicitud por correo electrónico:	cgarza@rocsdr.com
Solicitud por teléfono:	(210) 490-8808, Ext.1
Solicitud por correo postal:	P.O. Box 2077, San Antonio, Texas 78297-2077

Se ha puesto en vigor una orden para suspender los litigios.

Las demandas en contra de Gramercy y personas aseguradas por Gramercy han sido suspendidas bajo el Código de Seguros de Texas §§ 443.008 y 462.309. Las demandas en otros estados también podrían ser suspendidas bajo las leyes que sean aplicables en esos estados.

Otra información:

Más información está disponible en el sitio Web de SDR, www.gicreceivership.com, incluyendo:

- Respuestas a preguntas frecuentes sobre el proceso de administración judicial de liquidación de bienes;
- Los documentos que fueron presentados en el proceso de administración judicial de liquidación de bienes;
- y
- Los avisos de audiencias y el estado de las conferencias.

EXHIBIT 3

**GRAMERCY INSURANCE COMPANY (“GRAMERCY”)
NOTICE OF LIQUIDATION AND CLAIMS FILING DEADLINE**

Gramercy has been placed in liquidation. All policies of insurance issued by Gramercy were cancelled as of September 25, 2013. The deadline for filing claims against the Gramercy receivership estate is **11:59 p.m. CST on February 26, 2015**. See www.gireceivership.com to obtain a claim form, an explanation of the claim filing process, and other important information about the receivership. If you do not have access to the internet or if you have other questions call (210) 490-8808 Ext. 1; e-mail cgarza@rocsdr.com; or mail a request to Gramercy Insurance Company c/o Resolution Oversight Corporation, P.O. Box 2077, San Antonio, Texas 78297-2077.

**GRAMERCY INSURANCE COMPANY (“GRAMERCY”)
INSTRUCTIONS FOR PROOF OF CLAIM FORM**

A claim against the assets of the Gramercy receivership estate must be made by filing a Proof of Claim (“POC”). Failure to follow these instructions could result in the denial of your claim.

1. You may file a POC if you:
 - a) are a policyholder, and have a claim under your Gramercy policy;
 - b) have a claim against an insured of Gramercy that is covered by a Gramercy policy; or
 - c) are owed an amount of money by Gramercy for any other reason.
2. A policy claim may be payable by a guaranty association. Information about the Texas Property and Casualty Insurance Guaranty Association is available at www.tpciga.org. Information about other states’ guaranty associations is available at www.ncigf.org/public/guarantyfunds. Do not use the Gramercy POC form to file a claim with a guaranty association.
3. You may file a POC for any amount due under a Gramercy policy that is not covered in whole or in part by a guaranty association, including unearned premium.
4. All applicable blanks on the POC form must be completed.
5. Each person making the claim must be identified clearly, and a separate POC form submitted for each person or claim. If a POC is submitted on behalf of another person, evidence of the authority to file the claim must be attached.
6. If the amount of the claim has not yet been determined, state “undetermined” in the blank for “Total Amount of Claim.”
7. Provide an explanation of your claim, and include any documents supporting your claim. If you are involved in a lawsuit against Gramercy or an insured of Gramercy, include the case name, docket number and the court in which it is pending.
8. The POC must be signed before a notary public. A POC that is not notarized will not be accepted.
9. You should keep a copy of the completed POC, and any proof that it was mailed or received.
10. POCs must be sent by U.S. Mail, courier service, or hand delivery to the address on the POC form and received by the SDR no later than 11:59 p.m. CST on February 26, 2015. **POCs submitted by e-mail or fax will not be accepted.**

NOTICE TO PERSONS WITH CLAIMS AGAINST INSURED OF GRAMERCY

Section 443.256 of the Texas Insurance Code contains requirements for claims against a person who was insured by Gramercy (an “Insured”). By filing a POC, a claimant waives any right to pursue the personal assets of an Insured for the claim, to the extent of the coverage or policy limits provided by Gramercy. A claimant who files a POC must seek satisfaction of the claim solely from any distribution from the receivership, and any payments from a guaranty association, to the extent of the coverage or policy limits. The waiver does not release an Insured with respect to a claim in excess of the coverage or policy limits. The waiver may be voided as described in Section 443.256 of the Texas Insurance Code.

**COMPLETED POCS MUST BE RECEIVED BY THE SDR
NO LATER THAN 11:59 P.M. CST, FEBRUARY 26, 2015.**

To Be Completed by SDR

POC # _____
Claim # _____
Date Received _____

Filing Deadline:
February 26, 2015
11:59 p.m. CST

GRAMERCY INSURANCE COMPANY
PROOF OF CLAIM

Return this completed Proof of Claim form and supporting documentation to the applicable address below. A Proof of Claim must be received by the SDR no later than **11:59 p.m. CST on February 26, 2015.**

BY MAIL:
Resolution Oversight Corporation
Special Deputy Receiver
Gramercy Insurance Company
P.O. Box 2077
San Antonio, Texas 78297-2077

BY COURIER OR HAND DELIVERY:
Resolution Oversight Corporation
Special Deputy Receiver
Gramercy Insurance Company
222 East Houston St., Suite 550
San Antonio, Texas 78205

Please read the Proof of Claim instructions carefully prior to completing this Proof of Claim. Please print or type.

Name of Claimant

\$ _____
Total Amount of Claim

Street Address

Soc. Sec. or Tax ID Number

City State Zip

Telephone Number

E-mail Address

Facsimile Number

If the claimant is represented by an attorney, please complete the following section, and attach a copy of the Power of Attorney:

Name of Attorney

State Bar No.

Name of Law Firm

Tax ID Number

Street Address

Telephone Number

City State Zip

Facsimile Number

E-mail Address

Provide an explanation of your claim below. Attach additional pages if necessary.

NOTE: ATTACH DOCUMENTATION TO SUPPORT YOUR CLAIM

AFFIRMATION OF CLAIMANT

Unless noted herein: I alone am entitled to file this claim. No others have an interest in this claim. No payments have been made on the claim. No third party is liable on this debt. The sum claimed is justly owing, and there is no set-off. I declare, under penalty of perjury, that all of the statements made in this Proof of Claim and all documents attached to this form are true, complete, and correct. If I am making a claim against a person insured by Gramercy Insurance Company, I understand that I am waiving any right to pursue the personal assets of that person, to the extent of the coverage and limits provided by the policy issued by the now insolvent insurer Gramercy Insurance Company.

Signature

Print Name

State of _____

County of _____

The foregoing instrument was acknowledged before me this _____ day of _____, 201__, by _____, who has executed this instrument on such individual's own behalf, who is personally known to me or who has produced a Driver License or other information as identification.

Notary Public

Printed Name

My Commission Expires: _____

(NOTARY SEAL)

EXHIBIT 5

**PARA USO EXCLUSIVO DEL PROGRAMA DE SEGURO GLOBAL GUARDIAN
(GLOBAL GUARDIAN INSURANCE PROGRAM –GGIP, POR SU NOMBRE Y
SIGLAS EN INGLÉS)**

**GRAMERCY INSURANCE COMPANY (“GRAMERCY”)
INSTRUCCIONES PARA COMPLETAR EL FORMULARIO DE
COMPROBANTE DE RECLAMACIÓN**

Para poder hacer una reclamación contra los activos de la liquidación de bienes de Gramercy, es necesario presentar un Comprobante de Reclamación (Proof of Claim -POC, por su nombre y siglas en inglés). El no seguir estas instrucciones pudiera resultar en la denegación de su reclamación.

1. Usted puede presentar un POC si usted:
 - a) es el titular de la póliza y tiene una reclamación bajo su póliza de Gramercy;
 - b) tiene una reclamación contra un asegurado de Gramercy que tiene cobertura bajo una póliza de Gramercy; o
 - c) Gramercy le debe una cantidad de dinero por cualquier otra razón.
2. Una reclamación bajo una póliza la puede pagar una asociación afianzadora. La información sobre la Asociación Afianzadora de Seguros de Propiedad y Percances de Texas (Texas Property and Casualty Insurance Guaranty Association, por su nombre en inglés) está disponible en www.tpciga.org. La información sobre las asociaciones afianzadoras en otros estados está disponible en www.ncigf.org/public/guarantyfunds. No use el formulario de POC de Gramercy para presentar una reclamación ante una asociación afianzadora.
3. Usted puede presentar un POC por cualquier cantidad adeudada bajo una póliza de Gramercy que no esté cubierta, total o parcialmente, por una asociación afianzadora, incluyendo primas no usadas.
4. Es necesario llenar todos los blancos aplicables en el formulario de POC.
5. Cada persona que hace una reclamación tiene que ser identificada claramente, y presentar un formulario de POC aparte para cada persona o reclamación. Si se presenta un POC en nombre de otra persona, es necesario adjuntar evidencia de la autoridad para presentar dicha reclamación.
6. Si aun no se ha determinado la cantidad de la reclamación, indique “indeterminada” en el blanco para “Total de la Cantidad de la Reclamación”.
7. Proporcione una explicación de su reclamación e incluya cualquier documento que apoye su reclamación. Si usted está participando en una demanda en contra de Gramercy o de un asegurado de Gramercy, incluya el nombre del caso, el número del caso y el tribunal en el que está pendiente.
8. El POC debe ser firmado frente a un notario público (notary public, por su nombre en inglés). Un POC que no esté notariado no será aceptado.
9. Usted debe guardar una copia del POC que ha sido completado y cualquier prueba de que haya sido enviada por correo o recibida.
10. Los POC tienen que ser enviados por correo postal de los Estados Unidos, por servicio de mensajería, o ser entregados personalmente a la dirección en el formulario de POC y ser recibidos por el SDR no

más tardar de las 11:59 p.m., hora del centro, el 26 de febrero de 2015. **Los POC que son presentados por medio de correo electrónico o fax no se aceptarán.**

**AVISO A LAS PERSONAS CON RECLAMACIONES
EN CONTRA DE LOS ASEGURADOS DE GRAMERCY**

La Sección 443.256 del Código de Seguros de Texas (Texas Insurance Code, por su nombre en inglés) contiene requisitos para presentar reclamaciones en contra de una persona que estuvo asegurada por Gramercy (un "Asegurado"). Al presentar un POC, el reclamante renuncia a cualquier derecho que tenga para solicitar los bienes personales de un Asegurado por la reclamación, hasta el límite de la cobertura o límites de la póliza que provee Gramercy. Un reclamante que presenta un POC debe solicitar que se liquide la reclamación exclusivamente de la distribución de la liquidación de bienes, y cualquier pago de una asociación afianzadora, hasta el límite de la cobertura o límites de la póliza. La renuncia no exonera al Asegurado con respecto a una reclamación en exceso de la cobertura o límites de la póliza. La renuncia puede ser anulada según se describe en la Sección 443.256 del Código de Seguros de Texas.

**ES NECESARIO QUE EL SDR RECIBA
LOS POC COMPLETOS
A NO MÁS TARDAR DE LAS 11:59 P.M., HORA DEL
CENTRO, EL 26 DE FEBRERO DE 2015.**

Más información está disponible en www.gicreceivership.com

**PARA USO EXCLUSIVO DEL PROGRAMA DE SEGURO
GLOBAL GUARDIAN (GLOBAL GUARDIAN INSURANCE
PROGRAM –GGIP, POR SU NOMBRE Y SIGLAS EN INGLÉS)**

Lo llenará SDR

POC # _____
Claim # _____
Date Received _____

**Fecha límite para presentar
reclamaciones:
26 de febrero de 2015
11:59 P.M., Hora del Centro**

**PARA USO EXCLUSIVO DEL PROGRAMA DE SEGURO GLOBAL GUARDIAN
(GLOBAL GUARDIAN INSURANCE PROGRAM –GGIP, POR SU NOMBRE Y
SIGLAS EN INGLÉS)**

**GRAMERCY INSURANCE COMPANY
COMPROBANTE DE RECLAMACIÓN**

Devuelva este formulario completo del Comprobante de Reclamación y los documentos pertinentes a la dirección aplicable que se indica en la parte de abajo. El SDR debe recibir el Comprobante de Reclamación no más tardar de las **11:59 p.m., Hora del Centro, el 26 de febrero de 2015.**

POR CORREO POSTAL:

Resolution Oversight Corporation
Special Deputy Receiver
Gramercy Insurance Company
P.O. Box 2077
San Antonio, Texas 78297-2077

POR SERVICIO DE MENSAJERÍA O
ENTREGADOS PERSONALMENTE:
Resolution Oversight Corporation
Special Deputy Receiver
Gramercy Insurance Company
222 East Houston St., Suite 550
San Antonio, Texas 78205

Por favor lea cuidadosamente las instrucciones del Comprobante de Reclamación antes de completar este Comprobante de Reclamación. Por favor escriba en letra de molde o a máquina.

Nombre del Reclamante

\$ _____
Cantidad Total de la Reclamación

Dirección

Número de Seguro Social
o de Identificación de Impuestos

Ciudad Estado Código Postal

Número de Teléfono

Dirección de Correo Electrónico

Número de Fax

Si el reclamante es representado por un abogado, por favor complete la siguiente sección y adjunte una copia del poder notarial (Power of Attorney, por su nombre en inglés):

Nombre del Abogado

No. de la Barra de Abogados del Estado de Texas

Nombre del Despacho de Abogados

Número de Identificación de Impuestos

Dirección

Número de Teléfono

Ciudad Estado Código Postal

Número de Fax

Dirección de Correo Electrónico

Proporcione una explicación de su reclamación en la parte de abajo. Adjunte páginas adicionales si es necesario.

NOTA: ADJUNTE LOS DOCUMENTOS PARA APOYAR SU RECLAMACIÓN

AFIRMACIÓN DEL RECLAMANTE

A menos que se indique lo contrario en este documento: Yo tengo el derecho individual de presentar esta reclamación. Nadie más tiene interés en esta reclamación. No se han hecho pagos por esta reclamación. Ningún tercero es responsable por esta deuda. La cantidad reclamada se debe justamente y no contiene descuentos. Yo declaro, bajo pena de perjurio, que todas las declaraciones hechas en este Comprobante de Reclamación y todos los documentos adjuntos a este formulario son ciertos y están completos y correctos. Si estoy presentando una reclamación en contra de una persona asegurada por Gramercy Insurance Company, yo entiendo que estoy renunciando a cualquier derecho que tenga para obtener los bienes personales de esa persona, hasta el límite de la cobertura y los límites de la póliza emitida por la aseguradora Gramercy Insurance Company, que actualmente es insolvente.

Firma

Nombre en letra de molde

Estado de _____

Condado de _____

El instrumento anterior lo aceptó frente a mí hoy día _____ de _____ de 201_____, quien firmó este instrumento en su propio nombre, a quien conozco personalmente o quien me mostró una licencia de conducir u otra información como identificación.

Notario Público

Nombre en letra de molde

(SELLO NOTARIAL)

Mi encomienda vence: _____



CAUSE NO. D-1-GV-12-001713

THE STATE OF TEXAS

§
§
§
§
§

IN THE DISTRICT COURT OF

VS.

TRAVIS COUNTY, TEXAS

GRAMERCY INSURANCE COMPANY

53RD JUDICIAL DISTRICT

**AFFIDAVIT OF ERNESTO A. GARZA IN SUPPORT OF
APPLICATION TO PROVIDE NOTICE AND SET CLAIMS FILING DEADLINE**

BEFORE ME, the undersigned notary, on this day personally appeared Ernesto A. Garza, who being duly sworn, states the following under oath:

1. "My name is Ernesto A. Garza. I am competent to make this affidavit. I am the President of Resolution Oversight Corporation, the Special Deputy Receiver for Gramercy Insurance Company. I have personal knowledge of the facts to which I attest.

2. I further state that I have read the statements contained in the attached *Application to Approve Notice and Set Claims Filing Deadline* and that they are true and correct based on my personal knowledge, my review of estate records and my consultation with my staff and sub-contractors.

3. I believe that the proposed notices, POC forms, and categories of parties for notice are in the best interests of the Gramercy estate, its policyholders, creditors, and obligations imposed by Chapter 443 of the Texas Insurance Code.

Further affiant sayeth not."

Original Signed by

Ernesto A. Garza

SWORN TO, SUBSCRIBED, and ACKNOWLEDGED BEFORE ME on this 30th day of January, 2014.

Original Signed by

Notary Public - State of Texas

