

STATE OF SOUTH CAROLINA
COUNTY OF RICHLAND

IN THE COURT OF COMMON PLEAS
FOR THE FIFTH JUDICIAL CIRCUIT

Michael Wise, as Director of the South
Carolina Department of Insurance,

Petitioner,

vs.

Oceanus Insurance Company, a Risk
Retention Group,

Respondent.

C.A. No. 2017-CP-40-05195

**ORDER APPROVING
TWELFTH CLAIMS REPORT
& RECOMMENDATION
OF LIQUIDATOR**

1. This matter comes before the Court pursuant to the Liquidator’s Twelfth Claims Report, Recommendation & Application for Order Approving Same (the “Application”) filed in accordance with S.C. Code Ann. § 38-27-620 (2015). Attached as Exhibit A to the Application is a schedule containing the names and addresses of claimants holding a Class 2 claim as defined by S.C. Code Ann. § 38-27-610(2) (2015), and recommended amounts to be paid on each claim. Attached as Exhibit B to the Application is a schedule containing names and addresses of claimants holding a claim with a priority subordinate to Class 2, their Proof of Claim number and class code. Also attached as Exhibit C to the Application is a schedule containing the names and addresses of claimants holding a Class 2 claim, and the revised valuation of the claim. Also attached to the Application as Exhibit D is a detailed Affidavit of the duly-appointed Special Deputy Liquidator filed in support of the Application. It appearing that the Recommendation is in the interests of these claimants and other creditors in this matter, the Application is hereby approved.

2. **IT IS THEREFORE ORDERED** that pursuant to S.C. Code Ann. §§ 38-27-10 et seq., the Twelfth Claims Report and Recommendation is APPROVED.

IT IS FURTHER ORDERED that if any additional factors hereafter come to the attention of the Liquidator or his Special Deputy that may require modification, the Liquidator shall promptly file an application to modify these claims or the Recommendation thereon.

AND IT IS SO ORDERED.

_____, 2026
Columbia, South Carolina

Daniel Coble
Chief Administrative Judge
Fifth Judicial Circuit



Richland Common Pleas

Case Caption: Raymond G Farmer , plaintiff, et al vs Oceanus Insurance Company

Case Number: 2017CP4005195

Type: Order/Other

So Ordered

s/ Daniel Coble, 2774

**STATE OF SOUTH CAROLINA
COUNTY OF RICHLAND**

**IN THE COURT OF COMMON PLEAS
FOR THE FIFTH JUDICIAL CIRCUIT**

Michael Wise, as Director of the South
Carolina Department of Insurance,

C.A. No. 2017-CP-40-05195

Petitioner,

**LIQUIDATOR'S TWELFTH CLAIMS
REPORT, RECOMMENDATION
& APPLICATION FOR ORDER
APPROVING SAME**

vs.

Oceanus Insurance Company, a Risk
Retention Group,

Respondent.

Comes now Petitioner Michael Wise, as Liquidator of the above-captioned insurance company (Oceanus), by and through the undersigned counsel and files herewith his Twelfth Claims Report, applies to the Court for an Order approving the Liquidator's undisputed claim determinations specified herein and recommends approval thereof.

This application is made pursuant to the South Carolina Insurers Rehabilitation and Liquidation Act, S.C. Code Ann. §§ 38-27-10 *et seq.*, specifically, S.C. Code Ann. § 38-27-620(a) (2015), wherein the Liquidator is required to review all claims duly filed in the liquidation proceedings, make such further investigation as he deems necessary, and submit a claims report to the Court containing his claim recommendations.

In support of his report, recommendation and application, the Liquidator would respectfully show the following:

1. On September 21, 2017, the Court entered an Order Commencing Liquidation Proceedings & Granting an Injunction & Automatic Stay of Proceedings regarding Oceanus.
2. Between the Liquidation Date of September 21, 2017 and March 20, 2018, the Claims Bar Date, the Liquidator issued seven thousand one hundred and sixty-two (7,162) Notices

of Liquidation and Proof of Claim (POC) forms, with instructions to policyholders, third-party claimants and other potential claimants and/or creditors of Oceanus.

3. For five (5) consecutive days commencing October 27, 2017, notice of the liquidation was published in the New York Times, a newspaper of nationwide circulation, informing interested parties of the liquidation proceedings and including contact information and instructions for the timely filing of a POC.

4. For two (2) consecutive days commencing October 22, 2017, notice of the liquidation was published in the Miami Herald, a newspaper of countywide circulation in Miami-Dade, Broward and Monroe Counties, informing interested parties of the liquidation proceedings and including contact information and instructions for the timely filing of a claim.

5. On or before the Bar Date of March 20, 2018, the Liquidator received one thousand four-hundred and four (1,404) timely-filed POCs. The Liquidator also received fifty-five (55) late-filed claims, twenty (20) of which have now been deemed timely filed, with the remaining thirty-five (35) pending review.

6. One thousand and one hundred and nineteen (1,119) claims have previously been adjudicated and submitted to the Court for approval, with such approval granted by orders entered:

- June 26, 2019,
- February 21, 2020,
- October 29, 2020,
- May 24, 2022,
- September 13, 2023,
- April 10, 2024,
- August 7, 2024,

- January 22, 2025,
- May 16, 2025, and
- December 3, 2025

7. Sixty (60) additional POCs have now been adjudicated. All remaining POCs received are presently under evaluation.

8. Attached as Exhibit A and incorporated herein is a Schedule listing the names and addresses of forty-nine (49) claimants holding a Class 2 claim as defined by S.C. Code Ann. § 38-27-610(2) (2015), the POC number assigned by the Liquidator, the original claim amount, and the valuation of the claim proposed by the Liquidator and as agreed to by the claimant.

9. Attached as Exhibit B and incorporated herein is a Schedule listing the names and addresses of eleven (11) claimants holding a class of claim subordinate to Class 2 as defined by S.C. Code Ann. § 38-27-610 (2015). Exhibit B also includes the number assigned to each Proof of Claim and the priority class as defined by S.C. Code Ann. § 38-27-610 (2015). These claims were adjudicated as to priority class only, as the Liquidator presently expects distributions to Class 2 to be less than 100 percent.

10. Attached as Exhibit C is the Liquidator's revised recommendation for three (3) claims previously submitted in the Fifth Claims Report and approved by the Court September 13, 2023, and the Seventh Claims Report approved by the Court on August 7, 2024. This Exhibit C incorporates the listing of names and addresses of three (3) claimants holding a Class 2 claim as defined by S.C. Code Ann. 38-27-610(2) (2015), the POC number assigned by the Liquidator, the original Court allowed amount, payments received by the claimant, if any, and the revised valuation of the claim by the Liquidator.

11. In further support of this report, recommendation and application, the Liquidator has attached as Exhibit D, the affidavit of Michael J. FitzGibbons, Special Deputy Liquidator.

WHEREFORE, the Liquidator prays the Court issue an Order approving this Twelfth Claims Report and Recommendation, as well as such other relief as the Court deems just and proper.

Respectfully submitted,

HAYNSWORTH SINKLER BOYD, P.A.

s/John C. Bruton, Jr.

John C. Bruton, Jr., Esq. (SC Bar No. 975)

1201 Main Street, 22nd Floor

Columbia, SC 29201-3226

(803) 779-3080 Telephone

(803) 765-1243 Facsimile

jbruton@hsblawfirm.com

Attorneys for Special Deputy Liquidator

May 21, 2026

Oceanus Insurance Company, a RRG in Liquidation
Twelfth Claims Report
Exhibit A

POC	Claimant	Contact	Contact II	Address	City	State	Zip	Class Code	Claim Amount	Liquidator's Recommended Amount
1001461	N.B.	Elliot M. Wolf, Esq	Wolf & Furhman, LLP	1453 Webster Ave	Bronx	NY	10456	2	1,000,000.00	125,000.00
1001459	S.O.			1396 Carolyn Drive NE	Atlanta	GA	30329	2	40,000.00	0.00
1001408	S.C., MD	Scott Caudle	1503 West Elk Ave	Suite 1	Elizabethtown	TN	37643	2	unstated	5,636.99
100006	R.G.	Charles Rock Esq.	Shafran & Rock, PLLC	730 Broadway	Kingston	NY	12401	2	unstated	0.00
1001398	K.W.H.	John Anderson L. Meyer	Alston Hunt Floyd & Ing	1001 Bishop St. Suite 1800	Honolulu	HI	96813	2	unstated	0.00
1001390	S.K.	Philip Rakhunov	Pollack Solomon Duffy LLP	31 St. James Avenue, Suite 940	Boston	MA	2116	2	1,010,510.13	0.00
1001381	Z.S., M.D.	Melissa Zittel	Gibson, McAskill & Crosby	69 Delaware Ave Suite 900	Buffalo	NY	14202	2	unstated	0.00
1000011	T.D.	Christopher S. Olson Esq.	Doreen Shindel Esq.	325 Middle Country Road, Suite D.	Selden	NY	11784	2	unstated	0.00
1001153	M.M.H.S.	Steven B Sheinwald	Kirschenbaum & Kirschenbaum PC	200 Garden City Plaza, Suite 315	Garden City	NY	11530	2	unstated	0.00
1001150	Z.S., MD	John Visco, Esq.	Hutcheson, Affronti & Deisngner P.C.	3755 Military Rd.	Niagara Falls	NY	14305	2	unstated	0.00
1001058	Estate of C.Z.	Keith J Clarke	Meagher & Meagher	111 Church St	White Plains	NY	10601	2	unstated	0.00
1000823	H.M.G. PC	Craig A Burgess	Arciero McMillan & Burgess P.C.	299 Windsor Hwy	New Windsor	NY	12553	2	unstated	0.00
1000821	H.M.G. PC	Craig A Burgess	Arciero McMillan & Burgess P.C.	299 Windsor Hwy	New Windsor	NY	12553	2	100,000.00	50,000.00
1000819	H.M.G. PC	Craig A Burgess	Arciero McMillan & Burgess P.C.	299 Windsor Hwy	New Windsor	NY	12553	2	unstated	104,751.35
1000818	H.M.G. PC	Craig A Burgess	Arciero McMillan & Burgess P.C.	299 Windsor Hwy	New Windsor	NY	12553	2	unstated	480,562.30
1000755	K.M. and A.M.	James Stern	Widlitz & Stern PC	23 Green St. Suite 209	Huntington	NY	11743	2	unstated	350,000.00
1000753	S.B.C.M/ S.B.OBGYN/ P.J. MD	Denise Brusack	South Bay Ob Gyn	320 Montauk Highway	West Islip	NY	11795	2	unstated	0.00
1000751	A.H.	Helen M. Benzie	Law Office of Vincent D. McNamara	1045 Oyster Bay Road	East Norwich	NY	11732	2	unstated	7,500.00
1000748	E.W.K.	William Spratt, Esq	Shaub Ahmuty Citrin & Spratt LLP	1983 Marcus Ave	Lake Success	NY	11042	2	unstated	0.00
1000738	G.Z., Deceased	David Freeman, Esq	Philip J. Rizzuto PC	50 Charles Lindbergh Blvd, Suite 501	Uniondale	NY	11553	2	2,000,000.00	0.00
1000733	M.H., M.D	Daniel Brodersen	O'Conner, Haftel & Angell, PLLC	800 N. Magnolia Ave Ste. 1350	Orlando	FL	32803	2	250,000.00	0.00
1000678	E.M.T., D.O	Robert F. Elliott, Esq.	Bartlett LLP	3 Huntington Quadrangle Suite 304S	Melville	NY	11747	2	unstated	133,956.70
1000594	D.D.	John Barbera	Martin Clearwater & Bell	245 Main St	White Plains	NY	10601	2	unstated	0.00
1000557	C.C.	J Matthew Gilmore, Esq	Geppert, McMullen, Paye & Getty	21 Prospect Square	Cumberland	MD	21502	2	30,000.00	0.00
1000533	Y.B.	Gerard Emig	Gleason, Flynn, Emig, Fogleman & McAfee	11 N Washington ST	Rockville	MD	20850	2	unstated	0.00
1000527	A.T.S.	Anna Schwartz	Federico Schwartz Merolesi & Lyddane LLP	110 E 40th St. Suite 802	New York	NY	10016	2	unstated	0.00
1000517	H.C.T., JR	Hector C. Torres, JR	1005 Central Ave		Frankfurt	IN	46041	2	unstated	0.00
1000516	A.L.		2787 Diane Ave	SE	Palm Bay	FL	32909	2	unstated	0.00
1000040	A.M.	Duane M. Fiedler	Law Offices of Duane M. Fielder	81 Main St. Suite 304	White Plains	NY	10601	2	unstated	0.00
1000511	J.P.F.	Joseph C Myzio	Silberstein Awad & Miklos	600 Old County Rd Ste 412	Garden City	NY	11530	2	unstated	0.00
1000375	O.J.	David Gallagher, Esq	The Vrodolyak Law Group	741 North Dearborn Stree	Chicago	IL	60654	2	5,000,000.00	0.00
1000370	A.A.	Matt Rainis Esq.	Perry, Van Etten, Rainis & Kutner, LLP	225 Broad Hollow Road, Suite 430	Melville	NY	11747	2	unstated	0.00
1000363	E.Q.	Matthew R. Kreinces, Esq	Roura & Melamed	233 Broadway	New York	NY	10279	2	unstated	0.00
1000346	M.H.	Martin Herbstman	305 E 63rd St.	Apt 8H	New York	NY	10065	2	unstated	0.00

Oceanus Insurance Company, a RRG in Liquidation
Twelfth Claims Report
Exhibit A

POC	Claimant	Contact	Contact II	Address	City	State	Zip	Class Code	Claim Amount	Liquidator's Recommended Amount
1000293	W.L.			786 Montauk Highway	West Islip	NY	11795	2	1,000,000.00	0.00
1000291	W.L.			786 Montauk Highway	West Islip	NY	11795	2	1,000,000.00	0.00
1000278	N.P.	Yuko Nakahara	Martin Clearwater & Bell	220 E. 42nd Street	New York	NY	10017	2	1,300,000.00	0.00
1000268	Estate of V.L. by M.L.	Ira M. Newman, Esq	Sanocki Newman & Turret, LLP	225 Broadway, 8th Floor	New York	NY	10007	2	10,000,000.00	0.00
1000265	F.S.	Peter Rosenberg, Esq	Rosenberg, Minc, Falfokk, & Wolff	122 E. 42nd St.	New York	NY	10168	2	5,000,000.00	0.00
1000205	M.E.F.	Matt Rainis Esq.	Perry, Van Etten, Rainis & Kutner, LLP	175 Pinelawn Rd Ste 308	Melville	NY	11747	2	unstated	32,589.50
1000204	R.T.	Matt Rainis Esq.	Perry, Van Etten, Rainis & Kutner, LLP	175 Pinelawn Rd Ste 308	Melville	NY	11747	2	unstated	95,400.00
1000196	N. L-S.	Charles Rock Esq.	Shafran & Rock, PLLC	730 Broadway	Kingston	NY	12401	2	unstated	0.00
1000170	M.K.	Mohamed Khalaf	7250 Woodhaven Dr		Lockport	NY	14094	2	25,000.00	0.00
1000150	G.P.	Ari Taub, Esq	Phillips & Paolicelli, LLP	747 Third Avenue, 6th Floor	New York	NY	10017	2	unstated	125,000.00
1000140	M.L.	Gary Alan Friedman, Esq	Friedman & Friedman	2600 Douglas Road, #1011	Coral Gables	FL	33134	2	11,000,000.00	400,000.00
1000098	W.I.S., Inc	John Sandberg, Esq	Sandberg, Phoenix & Von Gontard PC	600 Washington Ave., 15th Floor	St. Louis	MO	63101	2	1,000,000.00	0.00
1000085	J.K. as Executor of P.K.	Larry Bloomstein, Esq.	Aaronson Rappaport Feinstein & Deutsch llp	600 Third Ave.	New York	NY	10016	2	unstated	0.00
1000076	M.F.	John I. Lancuso, Esq.	Lewis & Lewis, P.C.	P.O. Box 0340, 208 Pine Street	Jamestown	NY	14702	2	100,000.00	0.00
1000072	R.L. MD,PC	Ravi Loona	211-35 34th Rd.		Bayside	NY	11361	2	unstated	0.00
										1,910,396.84

Oceanus Insurance Company, a RRG in Liquidation
 Twelfth Claims Report
 Exhibit B

POC	Claimant	Contact	Contact II	Address	City	State	Zip	Class Code	Claim Amount	Liquidator's Recommended Amount
1001363	G.S., LLP	Thomas Gerspach	Gerspach Sikowscow, LLP	40 Fulton Street, Suite 1402	New York	NY	10038	6	27,304.11	N/A
1000828	S.K.O.	Greg King	Stoll Keenon Ogden	500 W Jefferson St Suite 2000	Louisville	KY	40202	6	10,492.50	N/A
1000798	P.S.D. LLP	Phillip Rakhunov, Esq.	Pollack Solomon Duffy LLP	31 St. James Ave Suite 940	Boston	MA	2199	6	42,080.44	N/A
1000710	R. & V.	Ricotta & Visco	496 Main Street		Buffalo	NY	94202	6	18,930.00	N/A
1000687	S. & J., PLLC	Steptoe & Johnson, PLLC	400 White Oaks Blvd		Bridgeport	WV	26330	6	64,185.97	N/A
1000683	S. & J., PLLC	Steptoe & Johnson, PLLC	400 White Oaks Blvd		Bridgeport	WV	26330	6	5,046.00	N/A
1000443	O. O. B. & F.	Terence O'Connor	O'Connor O'Connor Bresee & First, P.C	20 Corporate Blvd	Albany	NY	12211	6	12,799.52	N/A
1000440	P. & L., P.C	Michael Romano, Esq.	Voute Lohrfink McAndrew & Meisner LLP	170 Hamilton Ave	White Plains	NY	10601	6	30,509.13	N/A
1000414	K., O. & W., P.C	Scott C Watson, Esq.	Keller, O'Reilly & Watson P.C	242 Crossways Park West	Woodbury	NY	11797	6	33,744.54	N/A
1000264	M. L. N. LLP	Caryn Lilling Esq.	100 CrosswaysPark Drive West	Suite 310	Woodbury	NY	11797	6	4,029.00	N/A
1000102	O. O. B. & F.	Terence O'Connor	20 Corporate Blvd		Albany	NY	12211	6	10,759.55	N/A

Oceanus Insurance Company, a RRG in Liquidation
 Twelfth Claims Report
 Exhibit C

POC	Claimant	Contact	Contact II	Address	City	State	Zip	Court Allowed Amount	Court Order	Payments Received from Others	Liquidator's Revised Recommended Amount
1000502	N.K, Ind & as Exec of Est of M.K.	Nicole M. Murdocca, Esq.	Sullivan & Galleshaw, LLP	108-15 Crossbay Blvd	Ozone Park	NY	11417	200,000.00	7	30,000.00	170,000.00
1000294	W.L.			786 Montauk Highway	West Islip	NY	11795	0.00	5	N/A	35,000.00
1000045	E.W. as Administrator of B.S.	Stacey Subryan-Gerber	Tiveron Law PLLC	2410 North Forest Road, #301	Amherst	NY	14068	0.00	5	N/A	30,000.00
											235,000.00

Exhibit D

STATE OF SOUTH CAROLINA
COUNTY OF RICHLAND

Michael Wise, as Director of the South
Carolina Department of Insurance,

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vs.

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Retention Group,

Respondent.

IN THE COURT OF COMMON PLEAS
FOR THE FIFTH JUDICIAL CIRCUIT

C.A. No. 2017-CP-40-05195

**AFFIDAVIT OF MICHAEL
J. FITZGIBBONS
IN SUPPORT OF LIQUIDATOR'S
TWELFTH CLAIMS REPORT,
RECOMMENDATION
& APPLICATION FOR ORDER
APPROVING SAME**

Michael J. FitzGibbons, being first duly sworn, deposes and says as follows:

1. I am the Special Deputy Liquidator of Oceanus Insurance Company, a Risk Retention Group ("Oceanus"). I was appointed to my position by the Liquidator, Raymond G. Farmer, Director of the South Carolina Department of Insurance, which designation was approved by the Court on September 21, 2017.

2. I am over 21 years of age and suffer no legal disability.

3. By virtue of my appointment as Special Deputy Liquidator, I have been actively and personally involved in the liquidation of Oceanus at all times since it was placed into liquidation, including the matters addressed in this Affidavit. My responsibilities as the Special Deputy Liquidator include supervision and oversight of and direct involvement in the liquidation process. I am familiar with the claims process and with the claims that have been filed. Therefore, I have personal knowledge of the matters addressed in this Affidavit.

4. The claims process has included the following components, each and every one of which has been followed:

- a. Notice of Oceanus' liquidation was given in accordance with S.C. Code Ann. § 38-27-410(a) (2015).
- b. In accordance with S.C. Code Ann. § 38-27-410(b) (2015), the notice specified that the last date to file a timely proof of claim with the Liquidator was March 20, 2018. Proofs of claim had to be postmarked no later than 5:00 P.M. Eastern Daylight Time on that date to be considered timely.
- c. The Liquidator's Proof of Claim ("POC") forms are in compliance with S.C. Code Ann. § 38-27-550(a) (2015) and provided notice of the liquidation of Oceanus in accordance with S.C. Code Ann. § 38-27-410(b) (2015).
- d. As the duly-appointed Special Deputy Liquidator, I have considered each of the sixty (60) POCs subject to this Claims Report, in accordance with the requirements of the South Carolina Insurers Rehabilitation and Liquidation Act, S.C. Code Ann. §§ 38-27-10 *et seq.*
- e. I am administering the claims process. I initially retained as Oceanus employees Tim Morris and Jennifer Arias to assist me in the adjudication of claims under policies for losses incurred. Mr. Morris and Ms. Arias are no longer employees of Oceanus. In their stead, I engaged Glynloen Consulting and Laura Arp Law¹ with the responsibility to make recommendations to the Liquidator as to the validity, valuation and priority of each POC. The Liquidator and/or his duly-appointed Special Deputy then independently approves or denies these recommendations, in whole or in part, and submits the same to this Court for approval.

¹ In February of 2026 Ms. Arp joined the law firm of Mitchill Williams and Ms. Arp's engagement agreement has been amended accordingly.

- f. Each POC subject to this Claims Report contains the necessary claim file documentation for the Liquidator's recommendation thereon.
 - g. To the extent this Claims Report includes claims that were denied in whole or in part, notice of such denial complying with S.C. Code Ann. § 38-27-580(a) (2015) was provided to the affected claimants and either no timely objection was made by the affected claimants, the objection was resolved by mutual agreement, or the objection was decided pursuant to the Order Approving Procedures Governing Referee's Participation in Claims Administration.
5. I am submitting this Affidavit in support of the Liquidator's Twelfth Claims Report, Recommendation & Application for Order Approving Same ("Report, Recommendation and Application"), which pertains to forty-nine (49) Class 2 claims, eleven (11) claims with a priority subordinate to Class 2 and a restatement of three (3) claims, as prescribed by S.C. Code Ann. §§ 38-27-610 & -620 (2015).
6. Between the entry of the Liquidation Order on September 21, 2017 and March 20, 2018, I caused to be issued seven thousand one hundred and sixty-two (7,162) Notices of Liquidation and Proof of Claim (POC) forms, with instructions to policyholders, third-party claimants, and/or other potential claimants and creditors of Oceanus.
7. For five (5) consecutive days commencing October 27, 2017, I caused to be published Notice of the liquidation in the New York Times, a newspaper of nationwide circulation, informing interested parties of the liquidation proceedings and including contact information and instructions for the timely filing of a claim.
8. For two (2) consecutive days commencing October 22, 2017, I caused to be published Notice of the liquidation in the Miami Herald, a newspaper of countywide circulation in

Miami-Dade, Broward and Monroe Counties, informing interested parties of the liquidation proceedings and including contact information and instructions for the timely filing of a claim.

9. On or before the Bar Date of March 20, 2018, I received one thousand four hundred and four (1,404) timely filed POCs, and I received fifty-five (55) late-filed claims. Twenty (20) of the fifty-five (55) late-filed claims have been deemed timely filed, with thirty-five (35) pending further review.

10. One thousand and one hundred and nineteen (1,119) claims have previously been adjudicated and submitted to this Court for approval, with such approval granted by orders entered on

- June 26, 2019,
- February 21, 2020,
- October 29, 2020,
- May 24, 2022,
- September 13, 2023,
- April 10, 2024,
- August 7, 2024,
- January 22, 2025,
- May 16, 2025, and
- December 3, 2025

11. Sixty (60) additional claims have now been adjudicated and are the subject of this application. All remaining unadjudicated POCs are under evaluation.

12. Attached to the Report, Recommendation and Application and incorporated by reference as Exhibit A is a listing of the names and addresses of forty-nine (49) claimants with

Class 2 claims as defined in S.C. Code Ann. § 38-27-610(2) (2015), the POC number assigned, the original claim amount, and the Liquidator's valuation and recommendation pursuant to S.C. Code Ann. § 38-27-620 (2015).

13. Attached as Exhibit B and incorporated herein is a Schedule listing the names and addresses of eleven (11) claimants holding a class subordinate to Class 2 as defined by S.C. Code Ann. § 38-27-610 (2015). Exhibit B also includes the number assigned to each Proof of Claim and the priority class as defined by S.C. Code Ann. § 38-27-610 (2015). These claims were adjudicated as to priority class only, as distributions to Class 2 claimants are expected to be less than 100 percent.

14. Also attached to this Application and incorporated by reference is Exhibit C, which is a Schedule listing the names and addresses of three (3) claimants holding a Class 2 claim as defined by S.C. Code Ann. § 38-27-610(2) (2015), the POC number assigned by the Liquidator, the original Court allowed amount, payments received by the claimant, if any, and the revised valuation of the claim by the Liquidator.

15. To the best of my knowledge and belief, the claims and recommendations thereon subject to this Report and Application are not subject to modification. If any additional factors hereafter come to my attention which may require any modification, such as third-party payments or releases of any such claims, I will immediately notify the Liquidator, and he and/or I will promptly bring those matters to the attention of this Court in an amendment to modify such claims and recommendation.

[Signature on following page]

FURTHER AFFIANT SAYETH NOT.

Original Signed By

Michael J. FitzGibbons
Special Deputy Liquidator

SWORN to before me this 19th day of May, 2026

Original Signed by

Notary Public for the State of Arizona
My commission expires 09-15-2026



SARAH E. ALEXANDER
Notary Public - Arizona
Maricopa Co. / #633463
Expires 09/15/2026