

STATE OF SOUTH CAROLINA**IN THE COURT OF COMMON PLEAS****COUNTY OF RICHLAND****FOR THE FIFTH JUDICIAL CIRCUIT**Michael Wise, as Director of the South
Carolina Department of Insurance,

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

Petitioner,

vs.

**ORDER APPROVING
ELEVENTH CLAIMS REPORT
AND APPROVAL OF ADDITIONAL
20% CLASS 2 DISTRIBUTION**Oceanus Insurance Company, a Risk Retention
Group,

Respondent.

1. This matter comes before the Court pursuant to the Liquidator's Eleventh Claims Report, Recommendation & Application for Order Approving Same, and Approval of Second Interim Class 2 Distribution ("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 all 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. Also attached as Exhibit B and incorporated herein is a Schedule listing the name and address of the claimant holding a class subordinate to class 2 as defined by S.C. Code Ann. § 38-27-610(2) (2015 and the class code. Also attached to this Application as Exhibit C is a Schedule listing the names and addresses claimants holding a class 2 claim, and the revised valuation of the claim. Also attached as Exhibit D is a listing of the names and addresses of each Class 2 policyholder claimant to whom the Liquidator seeks to make an additional 20% distribution, the Court allowed amount, the total amount due to the claimant, the amount paid to date to the claimant, and the amount to be distributed. Also attached to the Application as Exhibit E is a detailed Affidavit of the duly-appointed Special Deputy Liquidator filed in support of this Application. This Recommendation is clearly in the

interests of these claimants, and therefore the Application is hereby approved.

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

IT IS THEREFORE ORDERED that the additional 20% distribution to Class 2 claimants set forth on Exhibit D, and any future Class 2 claimants that are subsequently approved by this Court, 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.

_____, 2025
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**

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

Petitioner,

vs.

Oceanus Insurance Company, a Risk
Retention Group,

Respondent.

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

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

**LIQUIDATOR'S ELEVENTH CLAIMS
REPORT, RECOMMENDATION
& APPLICATION FOR ORDER
APPROVING SAME, AND APPROVAL
OF SECOND INTERIM CLASS 2
DISTRIBUTION**

Comes now Petitioner Michael Wise, as Liquidator of the above-captioned insurance company (Oceanus), by and through the undersigned counsel and files herewith his Eleventh Claims Report, applies to the Court for an Order approving the Liquidator's undisputed claim determinations specified herein and further authorizing the Liquidator to make a second interim distribution.

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.

The application is further made pursuant to S.C. Code Ann. § 38-27-630, wherein the Liquidator may pay distributions in a manner that will assure the proper recognition of priorities and a reasonable balance between the expeditious completion of the liquidation and the protection of unliquidated and undetermined claims, including third party claims.

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 latter being the Claims Bar Date, the Liquidator issued approximately 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-four (54) late-filed claims, eighteen (18) of which have been deemed timely filed, with the remaining thirty-six (36) pending review.

6. One thousand and eighty-three (1,083) claims have previously been agreed 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
- September 4, 2025

7. Thirty-six (36) additional POC's have now been completely adjudicated and agreed. 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 thirty-one (31) 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 of one (1) Claimant 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 the Proof of Claim and the priority class as defined by S.C. Code Ann. § 38-27-610 (2015). The claim was 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 four (4) claims previously submitted in the Second and Sixth Claims Reports and approved by the Court February 21, 2020 and April 10, 2024. This Exhibit C incorporates 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. Provided the Court approves this Eleventh Claims Report as described above, the Liquidator proposes this Court then approves a second interim distribution to all Court approved Class 2 Claimants. The Court previously approved an initial 20% distribution to all Court approved claims on April 10, 2024.

12. The Liquidator further proposes that certain distributions be withheld pending compliance of certain Claimants pursuant to Section 111 of the Medicare, Medicaid & SCHIP Extension Act of 2007 (MMSEA). The Liquidator also proposes that certain distributions be withheld pending the requirements of certain Claimants pursuant to 26 U.S.C. § 6109 (Supplying of identifying numbers).

13. The additional 20% distribution to Claimants requested by this Application when added to the 20% distribution previously authorized by the Court reflects a 40% Court allowed distribution. The 40% Court allowed distribution paid or to be paid will total \$16,240,863.53 as depicted in the "Total Due" column of Exhibit D. The Liquidator further proposes the Court approves this additional 20% distribution for all future Class 2 Claimants' POCs that are subsequently approved by this Court without further order of this Court.

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

WHEREFORE, the Liquidator prays the Court issue an Order approving this Eleventh Claims Report and recommendation, with the actual distribution to be determined at the appropriate time in accordance with S.C. Code Ann. §§ 38-27-610 & -630 (2015), as well as such other relief as the Court deems just and proper.

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

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(803) 765-1243 Facsimile

jbruton@hsblawfirm.com

Attorneys for Special Deputy Liquidator

December 2, 2025

Class 2

ELECTRONICALLY FILED - 2025 Dec 02 3:41 PM - RICHLAND - COMMON PLEAS - CASE#2017CP4005195

Eleventh Claims Report
Ex. B
Class 6

POC	Claimant	Contact	Contact II	Address	City	State	Zip	Class Code	Liquidator's Recommended Amount
1000261	L.F.T. Ch. 7 T. for A.L.	James Bailey III Esq	Butler Snow LLP	6075 Poplar Avenue, Suite 500	Memphis	TN	38119	6	N/A

Eleventh Claims Report
Ex. C

POC	Claimant	Contact	Contact II	Address	City	State	Zip	Court Allowed Amount	Court Order	Payments Received from Others	Liquidator's Revised Recommended Amount
1001183	E.M. and S.G.	J. Ellsworth Summers Jr	Burr & Forman LLP	50 N Laura St. Suite 3000	Jacksonville	FL	32202	0.00	6	N/A	5,199.59
1001064	A.S., MD	John Sandberg, Esq	Sandberg, Phoenix & Von Gontard PC	600 Washington Ave., 15th Floor	St Louis	MO	63101	0.00	6	N/A	37,791.24
1000504	J.J.S.	John W. McChristian, Jr.	Ray, McChristian & Jeans P.C	101 Summit Ave, Suite 705	Fort Worth	TX	76102	600,000.00	6	N/A	500,000.00
1000090	M.A.D.	George Smith, Esq		26 Scotchtown Ave	Goshen	NY	10924	100,000.00	2	50,000.00	50,000.00
											592,990.83

Eleventh Claims Report
Ex. D

POC	Claimant	Contact	Contact II	Address	City	State	Zip	Class Code	Total Court Allowed Amount as Adjusted	Court Order	Total Due (40%)	Paid	Due
1001460	R.O. MD			PO Box 1118	Syosset	NY	11791	2	151,925.00	6	60,770.00	30,385.00	30,385.00
100004	A.C. for Estate of P.S.	Michael Zeres, Esq	Blume Folte Fried Zeres & Molinari	1 Main Street	Chatham	NJ	7928	2	150,000.00	2	60,000.00	30,000.00	30,000.00
1001457	L.L.			312 Long Island Avenue	Holtsville	NY	11742	2	75,000.00	6	30,000.00	15,000.00	15,000.00
1000010	H.M. & C.M.	Christopher S. Olson Esq.	Doreen Shindel Esq.	325 Middle Country Road, Suite D.	Selden	NY	11784	2	20,000.00	7	8,000.00	4,000.00	4,000.00
1001444	M.L., PLLC, f/b/o C.T.	Randall J. Phillips	Maginnis Howard	6842 Carnegie Blvd., Suite #100	Charlotte	NC	28211	2	150,000.00	9	60,000.00	30,000.00	30,000.00
1000012	S.S.	Christopher S. Olson Esq.	Doreen Shindel Esq.	325 Middle Country Road, Suite D.	Selden	NY	11784	2	50,000.00	7	20,000.00	10,000.00	10,000.00
1001443	M.L., PLLC, f/b/o C.T.	Randall J. Phillips	Maginnis Howard	6842 Carnegie Blvd., Suite #100	Charlotte	NC	28211	2	125,000.00	9	50,000.00	25,000.00	25,000.00
1001437	T.A.P., MD		Thomas A. Pischerchia, MD	2 Mark Drive	Port Jervis	NY	12771	2	24,610.16	8	9,844.06	4,922.03	4,922.03
1001416	M.H.S.	Maxon R Davis/Tyler C Smith	Davis,Hatley,Haffeman & Tighe, P.C.	101 River Drive North Third Floor	Great Falls	MT	59401	2	140,574.57	10	56,229.83	28,114.91	28,114.92
1000017	M.B.	Walter Boyaki, Esq.	Boyaki Law Firm	4621 Pershing Drive	El Paso	TX	79903	2	18,500.00	1	7,400.00	3,700.00	3,700.00
1000018	D.D. Sr.	John Ogles Esq.	Ogles Law Firm	PO Box 891	Jacksonville	AR	72078	2	1,000,000.00	7	400,000.00	200,000.00	200,000.00
1000024	E.H.	Fred D. Smith	PO Box 991		Martinsville	VA	24112	2	40,000.00	8	16,000.00	0.00	16,000.00
1000025	E.H.	George Smith, Esq	Murphy & Lambiase	26 Scotchtown Ave. #4	Goshen	NY	10924	2	125,000.00	2	50,000.00	25,000.00	25,000.00
1000026	J.T.	Jeanine L. Stevens	The Stevens Law Group	1809 N. Hoyne Avenue	Chicago	IL	60647	2	200,000.00	5	80,000.00	40,000.00	40,000.00
1000029	D.R.	Magdaleno C. Muro	Muro & Muro Law Offices: Muro Magdaleno	68828 Ramon Road, #C2	Cathedral City	CA	92234	2	25,000.00	2	10,000.00	5,000.00	5,000.00
1000032	F.A.	James Karamanis, Esq	Barney & Karamanis, LLP	180 North Stetson, Suite 3050	Chicago	IL	60601	2	75,000.00	5	30,000.00	15,000.00	15,000.00
1001382	K.Y.	Joseph G. Dell	Dell & Dean, PLLC	1225 Franklin Ave Suite 360	Garden City	NY	11530	2	300,000.00	2	120,000.00	60,000.00	60,000.00
1001359	J.L.G. and D.G.	Wm Andre Wills II	Wm Andrew Wills II PC	PO BOX 38494	Colorado Springs	CO	80937	2	900,000.00	8	360,000.00	180,000.00	180,000.00
1000042	S.R.	Duane M. Fiedler	Law Offices of Duane M. Fielder	81 Main St. Suite 304	White Plains	NY	10601	2	340,000.00	7	136,000.00	68,000.00	68,000.00
1000044	C. & N.M.	Stanley Landers, Esq.	Landers & Cernigliaro	One Old Country Road Suite 400	Carle Place	NY	11514	2	375,000.00	8	150,000.00	75,000.00	75,000.00
1001345	L.K.	Hadley Lundback Esq	Faraci Lange, LLP	1882 South Winton Road Suite 1	Rochester	NY	14618	2	100,000.00	2	40,000.00	20,000.00	20,000.00
1001344	M.W.	Hadley Lundback Esq	Faraci Lange, LLP	1882 South Winton Road Suite 1	Rochester	NY	14618	2	65,000.00	6	26,000.00	13,000.00	13,000.00
1001313	S.Z.	Joseph J. Manna, Esq.	Lipsitz Green Scime Cambria LLP	42 Delaware Ave, Suite 120	Buffalo	NY	14202	2	600,000.00	9	240,000.00	120,000.00	120,000.00
1001310	H.A.S.	James V. Hatem	Nixon Peabody, LLP	900 Elm Street, Suite 1400	Manchester	NH	3101	2	114,057.09	7	45,622.84	22,811.42	22,811.42
1000075	D.G. as A. of L. Estate H.A.S.	Steve Hamilton Esq.	Hamilton Law Firm	606 Ontario St. P.O.Box 188	Storm Lake	IA	50588	2	20,000.00	9	8,000.00	4,000.00	4,000.00
1001302	H.A.S.	James V. Hatem	Nixon Peabody, LLP	900 Elm Street, Suite 1400	Manchester	NH	3101	2	21,310.75	8	8,524.30	4,262.15	4,262.15
1000077	E.L.T.	Sheldon Green Esq, PC	566 Sunset Drive	Suite 202	Woodmere	NY	11598	2	65,000.00	3	26,000.00	13,000.00	13,000.00
1000079	T.S.	Lisa Levine, Esq.	Lisa S. Levine, P.A.	12080 Porto Way	Parkland	FL	33076	2	125,000.00	1	50,000.00	25,000.00	25,000.00
1001287	J.C., as minor by S.C. mother and J.C., father M. & J.D.	E. Drew Britcher, Esq	Britcher, Leone & Sergio, LLC	55 Harristown Road, Suite 305	Glen Rock	NJ	7452	2	800,000.00	10	320,000.00	0.00	320,000.00
1000103	M. & J.D.	Annamarie Bondi-Stoddard, Esq.	Pegalis & Erickson, LLC	1 Hollow Lane, Ste. 107	Lake Success	NY	11042	2	150,000.00	3	60,000.00	30,000.00	30,000.00
1000115	E.W. Ind and obo Estate of K.W. and Surviving Children	Jay Winckler Esq.	6836 Bee Cave Road	Bldg 3, Suite 333	Austin	TX	78746	2	200,000.00	4	80,000.00	40,000.00	40,000.00
1000116	E.B.	Edward A. Ruffo Esq.	Rheingold, Giuffra, Ruffo & Plotkin LLP	551 Fifth Ave. 29th Floor	New York	NY	10176	2	925,000.00	7	370,000.00	185,000.00	185,000.00
1000129	F.L. and the G.L.F. PLLC as Attorneys	Charles Gucciardo, Esq	The Gucciardo Law Firm, PLLC	170 Old Country Road, Suite 609	Mineola	NY	11501	2	275,000.00	1	110,000.00	55,000.00	55,000.00
1000132	A.W.	Sam Rosmarin, Esq	Friedman, Levy, Goldfarb & Green, P.C.	380 Lexington Ave 29th Floor	New York	NY	10168	2	250,000.00	2	100,000.00	50,000.00	50,000.00
1001223	I.O.	Matt Rainis Esq.	Perry, Van Etten, Rainis & Kutner, LLP	175 Pinelawn Rd Ste 308	Melville	NY	11747	2	19,886.11	9	7,954.44	3,977.22	3,977.22
1000134	L.V. A. of Estate	Eleni Coffinas, Esq	Sullivan, Papain, Block, McManus, Coffinas and Cannavo	120 Broadway, 27th Floor	New York	NY	10271	2	250,000.00	9	100,000.00	50,000.00	50,000.00
1001220	J. and K.L.	Albert Aquila	Sullivan Papain Block McGrath & Cannavo, P.C.	120 Broadway	New York	NY	10271	2	250,000.00	5	100,000.00	50,000.00	50,000.00
1000139	M.S.	Michael Bottar, Esq	Bottar Law PLLC	7078 E. Genesee St.	Fayetteville	NY	13066	2	50,000.00	10	20,000.00	0.00	20,000.00
1001213	W.L. and D.L.	Eleni Coffinas	Sullivan Papain Block McGrath & Cannavo, P.C.	120 Broadway, 27th Floor	New York	NY	10271	2	150,000.00	4	60,000.00	30,000.00	30,000.00
1001207	M.S.	Ashton Watkins, Esq	Law Office of Ashton Watkins	660 S Figueroa St # 1960	Los Angeles	CA	90017	2	5,000.00	10	2,000.00	0.00	2,000.00
1001194	P.E.	Mark Feldhaus	Lashly Baer	714 Locust St	St Louis	MO	63101	2	59,746.31	6	23,898.52	11,949.26	11,949.26
1001190	Y.T.	Garry Pogil, Esq	Garry Pogil Attorney at Law	1120 Avenue of the Americas 4th Floor	New York	NY	10036	2	20,000.00	10	8,000.00	0.00	8,000.00
1001183	E.M. and S.G.	J. Ellsworth Summers Jr	Burr & Forman LLP	50 N Laura St. Suite 3000	Jacksonville	FL	32202	2	5,199.59	11	2,079.84	0.00	2,079.84
1000160	S.R.	Bruce Ressler, Esq.	Ressler & Ressler	48 Wall St	New York	NY	10005	2	150,000.00	1	60,000.00	30,000.00	30,000.00
1001078	V.T. for A.K.P.	Michelle Maloney	Marynell Maloney Law Firm, PLLC	102 Wickes Street	San Antonio	TX	78210	2	200,000.00	3	80,000.00	40,000.00	40,000.00

Eleventh Claims Report
Ex. D

POC	Claimant	Contact	Contact II	Address	City	State	Zip	Class Code	Total Court Allowed Amount as Adjusted	Court Order	Total Due (40%)	Paid	Due
1000172	R.B.	J. Michael Hays, Esq	J. Michael Hayes	69 Delaware Ave Suite 1111	Buffalo	NY	14202	2	10,000.00	10	4,000.00	0.00	4,000.00
1000173	D.E.	Eleni Coffinas, Esq	Sullivan Papain Block McGrath & Cannavo, P.C.	120 Broadway, 27th Floor	New York	NY	10271	2	500,000.00	4	200,000.00	100,000.00	100,000.00
1001075	J. & G. LLP Trust Account for benefit of T.R.	Charles M. Johnstone	Johnstone & Gabhart LLP	PO BOX 313	Charleston	WV	25321	2	250,000.00	9	100,000.00	50,000.00	50,000.00
1001069	A.C./T.C.	Daniel J Tuczinski Esq	O'Connell & Aronowitz	54 State Street	Albany	NY	12207	2	28,000.00	9	11,200.00	10,000.00	1,200.00
1000178	D.I.A., LLC	John Sandberg, Esq	Sandberg, Phoenix & Von Gontard PC	600 Washington Ave., 15th Floor	St. Louis	MO	63101	2	83,439.82	10	33,375.93	16,687.96	16,687.97
1000180	O.U.C., LLC	Devin B. Noble	Allen Galluzzo Hevrin Leake LLC	839 N. Perryville Rd Suite 200	Rockford	IL	61107	2	77,857.00	3	31,142.80	15,571.40	15,571.40
1000183	R.G.		6032 Titlest Ln		Burlington	KY	41005	2	13,232.64	7	5,293.06	2,646.53	2,646.53
1000187	H.W.	Steven Alter, Esq	Slater Slater Schulman, LLP	445 Broad Hollow Road, Suite 419	Melville	NY	11747	2	500,000.00	5	200,000.00	100,000.00	100,000.00
1001065	B.D.	Jay Silverman, Esq	Ruskin Moscou Faltischek, P.C.	1425 RXR Plaza East Tower, 15th Floor	Uniondale	NY	11556	2	177,498.50	10	70,999.40	35,499.70	35,499.70
1001064	A.S., MD	John Sandberg, Esq	Sandberg, Phoenix & Von Gontard PC	600 Washington Ave., 15th Floor	St Louis	MO	63101	2	37,791.24	11	15,116.50	0.00	15,116.50
1000195	EB by L.M., mother	Rhonda Meyer	Duffy & Duffy, PLLC	1370 RXR Plaza	Uniondale	NY	11758	2	275,000.00	8	110,000.00	55,000.00	55,000.00
1001057	L.I.C.	Claim 501-343705-001	AIG Cash Receipts Department	17200 W 119th St	Olathe	KS	66061	2	1,300,000.00	10	520,000.00	260,000.00	260,000.00
1001054	F.A.	James A. Karamanis, Esq.	Barney & Karamanis, LLP	180 North Stetson, Suite 3050	Chicago	IL	60601	2	125,000.00	5	50,000.00	25,000.00	25,000.00
1001053	N.M. Jr, as attorney for S.F.	Nicholas Martino, Jr.	Law Firm of Nicholas Martino, Jr.	7448 Amboy Road	Staten Island	NY	10307	2	750,000.00	4	300,000.00	150,000.00	150,000.00
1001051	J.L., as admin of estate of J.L.	Richard Winkler	Winkler Kurtz LLP	1201 Route 112, Suite 200	Port Jefferson Station	NY	11776	2	200,000.00	1	80,000.00	40,000.00	40,000.00
1001045	E.J.B., admin of the Estate of M.B.	J Michael Benninger	Benninger Law PLLC	PO Box 623	Morgantown	WV	26507	2	75,000.00	1	30,000.00	15,000.00	15,000.00
1000208	L.A.	Ellen Coffinas, Esq	Sullivan Papain Block McGrath & Cannavo, P.C.	120 Broadway 27th Floor	New York	NY	10271	2	500,000.00	4	200,000.00	100,000.00	100,000.00
1000212	J.A.B.	Frank Andrea, Esq.	Andrea & Towsky Attorneys and Counselors at Law	320 Old Country Rd.	Garden City	NY	11530	2	235,000.00	2	94,000.00	47,000.00	47,000.00
1000213	P.B. & M.B.	Howard Essner, Esq	Essner & Kobin, LLP	3000 Marcus Avenue, Suite 3W8	Lake Success	NY	11042	2	50,000.00	3	20,000.00	10,000.00	10,000.00
1001034	R.M.C.	Nicholas Allis	Law Office of Nicholas R Allis	1805 Micheal Lane	Pacific Palisades	CA	90272	2	217,008.11	9	86,803.24	0.00	86,803.24
1000215	C.C.	Eleni Coffinas, Esq	Sullivan Papain Block McGrath & Cannavo, P.C.	120 Broadway 27th Floor	New York	NY	10271	2	200,000.00	4	80,000.00	40,000.00	40,000.00
1001023	A.L.	Gregory L Johnson	Johnson Moore	100 E Thousand Oaks Blvd #229	Thousand Oaks	CA	91360	2	795,000.00	7	318,000.00	159,000.00	159,000.00
1000220	J.B.	Peter D. Rosenberg Esq.	Rosenberg, Minc, Falokk, & Wolff	122 E 42nd St. Suite 3800	New York	NY	10168	2	125,000.00	1	50,000.00	0.00	50,000.00
1000224	F.B.	Jeff DeFrancisco, Esq	DeFrancisco & Falgiatano	6739 Meyers Road	East Syracuse	NY	13057	2	142,500.00	7	57,000.00	28,500.00	28,500.00
1001015	C.W., an infant by his m/n/g/ S.W.	John M. Daly, Esq	The Fitzgerald Law Firm	538 Riverdale Ave	Yonkers	NY	10705	2	600,000.00	2	240,000.00	120,000.00	120,000.00
1001009	D.I.R.	Michael Flomenhaft, Esq	The Flomenhaft Law Firm PLLC	90 Broad St Suite 1901	New York	NY	10004	2	20,000.00	9	8,000.00	0.00	8,000.00
1000228	D.L.	Julie Jordan DiPalma	Law Offices of Jordan DiPalma	One Fishers Road, Suite 200	Pittsford	NY	14534	2	150,000.00	4	60,000.00	30,000.00	30,000.00
1000230	B.G.	James LiCalzi, Esq	Duffy & Duffy, PLLC	1370 RXR Plaza	Uniondale	NY	11556	2	100,000.00	7	40,000.00	20,000.00	20,000.00
1000235	B.P.N. PC as attorney for M.S. and M.S.	Brian P. Neary Esq	Brian P. Neary, P.C.	619 Park Ave	Huntington	NY	11743	2	850,000.00	6	340,000.00	170,000.00	170,000.00
1001000	H.B.	Kenny Ramirez	Law Office of Kenny Ramirez	325 W Hospitality Lane, Suite 204	San Bernardino	CA	92408	2	250,000.00	8	100,000.00	50,000.00	50,000.00
1000240	L.R.	Eleni Coffinas, Esq	Sullivan Papain Block McGrath & Cannavo, P.C.	120 Broadway 27th Floor	New York	NY	10271	2	400,000.00	3	160,000.00	80,000.00	80,000.00
1000241	A.N.	Eleni Coffinas, Esq	Sullivan Papain Block McGrath & Cannavo, P.C.	120 Broadway 27th Floor	New York	NY	10271	2	100,000.00	4	40,000.00	20,000.00	20,000.00
1000993	S.M.F. Ltd.	c/o Stonehill Capital Management LLC	Attn: Ops Department	320 Park Ave., 26th Floor	New York	NY	10022	2	1,000,000.00	3	400,000.00	200,000.00	200,000.00
1000991	R.A.	Paul M. daCosta, Esq	Sarno da Costa D'Aniello Maceri LLC	425 Eagle Rock Ave, Suite 100	Roseland	NJ	7068	2	1,000,000.00	10	400,000.00	200,000.00	200,000.00
1000981	H. & A.F.	Carmine Rubino	Kramer Dillof Livingston & Moore	217 Broadway	New York	NY	10007	2	1,000,000.00	8	400,000.00	200,000.00	200,000.00
1000250	S.A.F. P.C. and L.V.	Stefano A. Filippazzo	Stefano A. Filippazo, P.C.	16 Court Street 28th Flr	Brooklyn	NY	11241	2	75,000.00	3	30,000.00	15,000.00	15,000.00
1000266	C.A. & N.B.	Ira M. Newman, Esq	Sanocki Newman & Turret, LLP	225 Broadway, 8th Floor	New York	NY	10007	2	1,020,000.00	6	408,000.00	204,000.00	204,000.00
1000807	S.I.P., LP	c/o Stonehill Capital Management	ATTN: Ops Dept	320 Park Ave. 26th Floor	New York	NY	100022	2	75,000.00	1	30,000.00	15,000.00	15,000.00
1000804	K.M.	Joseph J. Manna	Lipsitz Green Scime Cambria LLP	42 Delaware Ave, Suite 120	Buffalo	NY	14202	2	600,000.00	6	240,000.00	120,000.00	120,000.00
1000275	A.S.-S.	Edward Goodman, Esq	Simonson, Goodman, Platzer	111 John Street, Suite 1400	New York	NY	10038	2	150,000.00	10	60,000.00	30,000.00	30,000.00
1000280	S.I.P., LP	c/o Stonehill Capital Management	Attn: Ops Dept.	320 Park Ave. 26th Floor	New York	NY	10022	2	175,000.00	1	70,000.00	35,000.00	35,000.00
1000282	Estate of E.J.	Richard P. Abraham & Suzanne H. dePillis	Messa & Associates	123 South 22nd St	Philadelphia	PA	19104	2	50,000.00	2	20,000.00	10,000.00	10,000.00
1000284	M.P.	Michelle Rudderow	Rudderow Law, PLLC	205 S. Salina Street Suite 403	Syracuse	NY	13202	2	250,000.00	7	100,000.00	50,000.00	50,000.00

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POC	Claimant	Contact	Contact II	Address	City	State	Zip	Class Code	Total Court Allowed Amount as Adjusted	Court Order	Total Due (40%)	Paid	Due
1000285	M.P.	Michelle Rudderow	Rudderow Law, PLLC	205 S. Salina Street Suite 403	Syracuse	NY	13202	2	350,000.00	7	140,000.00	70,000.00	70,000.00
1000287	M.Z. & A.M.	Chet W. Kern, Esq.	Katz & Kern, LLP	144 East 44th St. Ste 504	New York	NY	10017	2	75,000.00	4	30,000.00	15,000.00	15,000.00
1000295	A.W. adm of Estate of M.W.	Mary Anne Walling, Esq	Sullivan Papain Block McGrath & Cannavo, P.C.	1140 Franklin Avenue, Suite 200	Garden City	NY	11530	2	165,000.00	7	66,000.00	33,000.00	33,000.00
1000746	M.B.	Magdi Bebawi	Magdi Bebawi	51 Burton Ave	Staten Island	NY	10309	2	25,000.00	8	10,000.00	5,000.00	5,000.00
1000743	M.B.	Magdi Bebawi	Magdi Bebawi	51 Burton Ave	Staten Island	NY	10309	2	72,919.00	6	29,167.60	14,583.80	14,583.80
1000742	M.B.	Magdi Bebawi	Magdi Bebawi	51 Burton Ave	Staten Island	NY	10309	2	56,752.43	8	22,700.97	11,350.49	11,350.48
1000301	J.L. (an infant)	Evan Torgan, Esq.	Torgan Cooper Aaron. P.C.	17 State St. 39th Floor	New York	NY	10004	2	2,000,000.00	4	800,000.00	0.00	800,000.00
1000736	J.M.S.	John Evans, Esq	Rawles & Henderson LLP	Centre Square West 1500 Market Street 19th Floor	Philadelphia	PA	19102	2	125,000.00	10	50,000.00	25,000.00	25,000.00
1000735	J & C.M.	Steven S. Siegel, Esq.	Steven S. Siegel	626 RXR Plaza, Suite 684	Uniondale	NY	11556	2	15,000.00	1	6,000.00	3,000.00	3,000.00
1000732	M.H., MD	Daniel Brodersen	O'Conner, Haftel & Angell, PLLC	800 N. Magnolia Ave Ste. 1350	Orlando	FL	32803	2	49,000.00	8	19,600.00	0.00	19,600.00
1000723	M.S., MD	Steven T. Russell		982 Montauk Highway	Bayport	NY	11705	2	2,959.00	9	1,183.60	0.00	1,183.60
1000722	G.G.	Marianne C. Burke, Esq.	Silberstein Awad & Miklos	600 Old County Rd Ste 412	Garden City	NY	11530	2	25,000.00	2	10,000.00	5,000.00	5,000.00
1000314	B.S.	Bernard J. Zimnoch	1909 Great Neck Rd. Ste B		Copliague	NY	11726	2	75,000.00	5	30,000.00	15,000.00	15,000.00
1000721	H.O.	Brian Schochet	Law Office of Brian Schochet, PLLC	4 E. Cheryl Rd.	Pine Brook	NJ	7058	2	25,000.00	2	10,000.00	5,000.00	5,000.00
1000700	D.T.	Dorothy Tuma & Law Offices of Roger M. Kunkis, as Attys	c/o Law Office of Roger Kunkis	31 West 34th St Suite 8026	New York	NY	10001	2	250,000.00	7	100,000.00	50,000.00	50,000.00
1000697	B.C.O.	Mark B. Connely	Hall, Hieatt & Connely & Bowen, LLP	444 Higuera Street Third Floor	San Luis Obispo	CA	93401	2	26,391.36	7	10,556.54	5,278.27	5,278.27
1000329	R.R. deceased	Glenn Cunningham, Esq	14100 San Pedro Ave	Suite 550	San Antonio	TX	78232	2	200,000.00	3	80,000.00	40,000.00	40,000.00
1000330	S.I.P., LP	c/o Stonehill Capital Management	ATTN: Ops Dept	320 Park Ave. 26th Floor	New York	NY	100022	2	375,000.00	5	150,000.00	75,000.00	75,000.00
1000332	J.L. as Admin of Estate of M.B.B.	John Bonina, Esq	Bonina & Bonina, PC	32 Court St., Ste 1700	Brooklyn	NY	11201	2	75,000.00	2	30,000.00	15,000.00	15,000.00
1000333	S.I.P., LP	c/o Stonehill Capital Management LLC	Attn: Ops Department	320 Park Ave., 26th Floor	New York	NY	10022	2	200,000.00	1	80,000.00	40,000.00	40,000.00
1000334	J.M.	John Bonina, Esq	Bonina & Bonina, PC	32 Court St., Ste. 1700	Brooklyn	NY	11201	2	650,000.00	6	260,000.00	130,000.00	130,000.00
1000689	J.K.	Steven B. Tannenbaum	Tannenbaum, Bellantone & Silver, P.C	2001 Marcus Ave, Suite N125	Lake Success	NY	11042	2	50,000.00	2	20,000.00	0.00	20,000.00
1000340	Estate of C.P.	Seth Bader, Esq	Bloomberg, Steinberg & Bader	433 Hackensack Avenue, 2nd Floor	Hackensack	NJ	7601	2	50,000.00	1	20,000.00	10,000.00	10,000.00
1000343	S.S. as Parent of Natural Guardian D.W.	James Fitzgerald, Esq	The Fitzgerald Law Firm	538 Riverdale Ave	Yonkers	NY	10705	2	1,300,000.00	4	520,000.00	260,000.00	260,000.00
1000348	P.S.	Paulette Sanders		2719 Ashbourne Drive	Gastonia	NC	28056	2	50,000.00	3	20,000.00	10,000.00	10,000.00
1000668	C.H., as Personal Rep of the Estate of A.H.	Isaac Ruiz- Carus, Esq.	Greco & Wozniak, P.A	501 N. Morgan St. Ste.200	Tampa	FL	33602	2	286,500.00	2	114,600.00	57,300.00	57,300.00
1000350	S.M.F. Ltd.	c/o Stonehill Capital Management LLC	Attn: Ops Department	320 Park Ave., 26th Floor	New York	NY	10022	2	150,000.00	3	60,000.00	30,000.00	30,000.00
1000351	H.F.	Peter Sim, Esq	Sim & Record LLP	42-40 Bell Blvd, Suite 405	Bayside	NY	11361	2	75,000.00	6	30,000.00	15,000.00	15,000.00
1000667	J.M./c/o S.M.	Sean B. Cronin	Cronin & Maxwell, PL	10950-60 San Jose Blvd PMB# 176	Jacksonville	FL	32223	2	250,000.00	5	100,000.00	50,000.00	50,000.00
1000652	J.J.	John P Valente	The Valente Law Group	2200 Defense Hwy, Ste 304	Crofton	MD	21114	2	25,000.00	10	10,000.00	5,000.00	5,000.00
1000364	S.I.P., LP	c/o Stonehill Capital Management LLC	Attn: Ops Department	320 Park Ave., 26th Floor	New York	NY	10022	2	150,000.00	2	60,000.00	30,000.00	30,000.00
1000645	A.C.	Brian M. Worstell	Phillips Branch & Hodges	PO BOX 2808	Columbus	GA	31902	2	425,000.00	9	170,000.00	85,000.00	85,000.00
1000368	I.S.	Elise Langsam, Esq.	217 Broadway	Suite 606	New York	NY	10007	2	950,000.00	10	380,000.00	190,000.00	190,000.00
1000640	M.L., MD	Marc Lussier, MD		24510 Town Center Dr. Suite 180	Valencia	CA	91355	2	29,999.99	8	12,000.00	6,000.00	6,000.00
1000597	F. Law Trust Account f/b/o S.G. IND and as PR	Daniel Flaherty	Flaherty Law Office	PO Box 1968	Great Falls	MT	59401	2	40,000.00	10	16,000.00	0.00	16,000.00
1000372	M.E.	Michael Carlucci, Esq	Collopy & Carlucci	540 Speedwell Avenue	Morris Plains	NJ	7950	2	650,000.00	10	260,000.00	130,000.00	130,000.00
1000376	N.H.	David Freeman, Esq	Philip J. Rizzuto PC	50 Charles Lindbergh Blvd, Suite 501	Uniondale	NY	11553	2	25,000.00	7	10,000.00	0.00	10,000.00
1000380	S.Y.P., MD			2 Utopia Drive	Colts Neck	NJ	7722	2	212,700.87	8	85,080.35	42,540.17	42,540.18
1000381	M.W.O. LLP IOLTA Trust Account	Les Weisbrod or Robert Wolf, Esqs.	Miller Weisbrod LLP		Dallas	TX	75243	2	500,000.00	8	200,000.00	100,000.00	100,000.00
1000580	C.C.	Tanjuiming A Marx, Esq	Bounds Law Group	1751 N Park Ave	Maitland	FL	32751	2	250,000.00	4	100,000.00	50,000.00	50,000.00
1000570	K.K.	Carolyn Caccese, Esq	Salenger, Sack, Kimmel & Bavaro	180 Froehlich Farm Blvd	Woodbury	NY	11797	2	50,000.00	2	20,000.00	10,000.00	10,000.00
1000569	K.K.	Carolyn Caccese, Esq	Salenger, Sack, Kimmel & Bavaro	180 Froehlich Farm Blvd	Woodbury	NY	11797	2	50,000.00	2	20,000.00	10,000.00	10,000.00
1000566	N.L.	Jeffrey Bloom	Gair Gair Conason	80 Pine St, 34th Fl	New York	NY	10005	2	370,000.00	7	148,000.00	74,000.00	74,000.00
1000554	M.U.	Marla Jonas, Esq.	Okun, Oddo & Babat, P.C.	8 West 38th St 10th Fl	New York	NY	10018	2	20,000.00	10	8,000.00	4,000.00	4,000.00
1000551	J.Q.	Robert Vilensky	Ronemus & Vilensky	112 Madison Ave	New York	NY	10016	2	400,000.00	4	160,000.00	80,000.00	80,000.00
1000407	M.A.	Mark Goldstein, Esq	Goldstein & Goldstein	26 Court Street, Suite 2005	Brooklyn	NY	11242	2	50,000.00	2	20,000.00	10,000.00	10,000.00
1000540	M.B. and D.B.	Audrey M. Tolson	The Tolson Firm, LLC	2971 Flowers Road South, Suite 265	Atlanta	GA	30341	2	250,000.00	5	100,000.00	50,000.00	50,000.00

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POC	Claimant	Contact	Contact II	Address	City	State	Zip	Class Code	Total Court Allowed Amount as Adjusted	Court Order	Total Due (40%)	Paid	Due
1000515	B.B.	Bassam Batarse	22259 Roberts Drive		Northville	MI	48167	2	35,407.98	9	14,163.19	7,081.60	7,081.59
1000498	J.M.	Michael Fischbein, Esq.	Paul B. Weitz & Associates, PC	55 Broadway - 23rd Floor	New York	NY	10006	2	25,000.00	4	10,000.00	5,000.00	5,000.00
1000494	P.H., MD	Andrew Kaplan	Aaronson Rappaport Feinstein & Deutsch LLP	600 3rd Ave	New York	NY	10016	2	26,001.36	9	10,400.54	0.00	10,400.54
1000493	R., L,Z. & F., LLP as attorneys for F.D.L.	Cliff Zelen, Esq.		1468 Broken Island	Palmyra	VA	22963	2	125,000.00	7	50,000.00	25,000.00	25,000.00
1000492	S.R. and C.H.	Miklos Pusztai	Park Chenaur & Associates	2505 S 320th St, Suite 100	Federal Way	WA	98003	2	100,000.00	4	40,000.00	20,000.00	20,000.00
1000484	R.L.			8312 SW 163rd Court	Miami	FL	33193	2	33,591.50	9	13,436.60	6,718.30	6,718.30
1000471	E.G.	59 Canterbury Ln		New Milford	NJ	NJ	7646	2	50,000.00	6	20,000.00	10,000.00	10,000.00
1000442	V.S.	Steven R Davis	Davis & Davis, Attorneys at Law	440 Louisiana, Suite 1850	Houston	TX	77002	2	200,000.00	3	80,000.00	40,000.00	40,000.00
1000461	A.C.	Kevin McCarrell		2 W. Washington St. Suite 1100	Greenville	SC	29601	2	975,000.00	9	390,000.00	195,000.00	195,000.00
1000450	H.X.	Joseph T. Pareres	Silverson, Pareres & Lombardi LLP	170 Hamilton Ave, Suite 310	White Plains	NY	10601	2	25,000.00	4	10,000.00	5,000.00	5,000.00
1000454	G.O.	Jeffrey Shapiro	Jeffrey Shapiro & Associates, LLC	675 3rd Ave Suite 3005	New York	NY	10017	2	750,000.00	2	300,000.00	150,000.00	150,000.00
1000504	J.J.S.	John W. McChristian, Jr.	Ray, McChristian & Jeans P.C	101 Summit Ave, Suite 705	Fort Worth	TX	76102	2	500,000.00	11	200,000.00	120,000.00	80,000.00
1001452	F.L.S. MD	Joseph Pareres	Silverson, Pareres & Lombardi LLP	170 Hamilton Avenue, Suite 310	White Plains	NY	10601	2	23,686.88	11	9,474.75	0.00	9,474.75
1001339	B.W. and R.O. PLLC	Kevin Donohue, Esq.	Garfunkel Wild, P.C.	11 Great Neck Rd., Suite 600	Great Neck	NY	11021	2	128,795.00	11	51,518.00	0.00	51,518.00
1001329	R.F. and K.F.	Anthony Ranken	Anthony Ranken & Assoc	222 N Church St	Wailuku	HI	96793	2	175,000.00	11	70,000.00	0.00	70,000.00
1001235	R.H.	Edward F. Humphries, Esq.	Vaslas Lepowsky & Hauss LLP Attorneys at Law	201 Edward Curry Ave.	Staten Island	NY	10314	2	950,000.00	11	380,000.00	0.00	380,000.00
1001181	E.M. and S.G.	J. Ellsworth Summers Jr	Burr & Forman LLP	50 N Laura St. Suite 3000	Jacksonville	FL	32202	2	50,956.97	11	20,382.79	0.00	20,382.79
1001166	E.M. and S.G.	J. Ellsworth Summers Jr	Burr & Forman LLP	50 N Laura St. Suite 3000	Jacksonville	FL	32202	2	75,669.24	11	30,267.70	0.00	30,267.70
1001160	E.M. and S.G.	J. Ellsworth Summers Jr	Burr & Forman LLP	50 N Laura St. Suite 3000	Jacksonville	FL	32202	2	48,766.45	11	19,506.58	0.00	19,506.58
1000980	C.S. and P.S.	John Cagney	Kramer Dillof Livingston & Moore	217 Broadway	New York	NY	10007	2	10,000.00	11	4,000.00	0.00	4,000.00
1000766	S.B.C.M./M.L. MD	Joe Hanshe	Hanshe Law Firm	116 Green Ave	Sayville	NY	11782	2	208,923.90	11	83,569.56	0.00	83,569.56
1000156	J.P.	Clifford S. Argintar, Esq.	Duffy & Duffy, PLLC	1370 RXR Plaza	Uniondale	NY	11556	2	850,000.00	11	340,000.00	0.00	340,000.00
1000090	M.A.D.	George Smith, Esq		26 Scotchtown Ave	Goshen	NY	10924	2	50,000.00	11	20,000.00	20,000.00	0.00
											16,240,863.53	6,945,880.21	9,294,983.32

Exhibit E**OF SOUTH CAROLINA****COUNTY OF RICHLAND**Michael Wise, as Director of the South
Carolina Department of Insurance,

Petitioner,

vs.

Oceanus Insurance Company, a Risk
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
ELEVENTH CLAIMS REPORT,
RECOMMENDATION &
APPLICATION FOR ORDER
APPROVING SAME, AND APPROVAL
OF SECOND INTERIM CLASS 2
DISTRIBUTION**

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 then 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 thirty-six (36) 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 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, and, in their stead, I have contracted Glynloen Consulting and Arp Insurance Law. I have now charged Glynloen Consulting and Arp Insurance Law 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.
- 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, or the objection was resolved by mutual agreement.

5. I am submitting this Affidavit in support of the Liquidator's Eleventh Claims Report, Recommendation & Application for Order Approving Same ("Report, Recommendation and Application"), which pertains to thirty-five (35) Class 2 claims and one (1) claim with a priority subordinate to Class 2, 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 approximately 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-four (54) late-filed claims. Eighteen (18) of the fifty-four (54) late-filed claims have been deemed timely filed, with thirty-six (36) pending

further review.

10. One thousand and eighty-three (1,083) 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
- Many 24, 2022
- September 13, 2023
- April 10, 2024
- August 7, 2024
- January 22, 2025
- May 16, 2025
- September 4, 2025

11. Thirty-six (36) 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 these thirty-one (31) 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). Actual distributions to Class 2 claimants will be determined and made at the appropriate time in accordance with S.C. Code Ann. §§ 38-27-610 & -630 (2015).

13. Also attached to this Application and incorporated by reference is Exhibit B, which

is the listing of the name and address of one (1) claimant subject to this application holding a priority subordinate to class 2 as defined by S.C. Code Ann. § 38-27-610(2) (2015). Exhibit B also includes the number assigned to the Proof of Claim and the priority class as defined by S.C. Code Ann. § 38-27-610 (2015). The claim was adjudicated as to priority class only as I expect, at this time, distributions to class 2 claimants to be less than 100 percent.

14. Also attached as Exhibit C is the Liquidator's revised recommendation for four (4) claims previously submitted in the Second and Sixth Claims Reports and approved by the Court February 21, 2020 and April 10, 2024. This Exhibit C incorporates the POC number assigned, the original Court allowed amount, payments received by the claimant, if any, and the revised valuation of the claim by the Liquidator.

15. I seek this Court's approval to pay an additional 20% distribution to all Court allowed claims. The Court previously approved an initial 20% distribution to all Court allowed claims on April 10, 2024. The 40% distribution paid or to be paid will total \$16,240,863.53 as set forth in Exhibit D to this Application.

16. I also ask the Court to approve the payment of this additional 20% distribution to all future Claimants holding a Class 2 POC that are agreed and approved by this Court without asking this Court for payment approval.

17. Adequate funds have been retained, following this initial distribution to assure fair and equitable treatment of all Class 2 policyholder claims which are unliquidated and undetermined on the date of this Application.

18. I further ask the Court to allow certain distributions to be withheld pending compliance of certain claimants pursuant to Section 111 of the Medicare, Medicaid & SCHIP Extension Act of 2007 (MMSEA). The Liquidator also proposes that certain distributions be

withheld pending the requirements of certain claimants pursuant to 26 U.S.C. § 6109 (Supplying of identifying numbers).

19. 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.

FURTHER AFFIANT SAYETH NOT.



Michael J. FitzGibbons
Special Deputy Liquidator

SWORN to before me this 25th day of November, 2025

Sarah E. Alexander

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