

**THE P.I.E. MUTUAL INSURANCE COMPANY,  
IN LIQUIDATION**

NOTICE OF (1) EXTENSION OF BAR DATE TO SEPTEMBER 23, 1999,  
(2) LIQUIDATOR'S DECISION NOT TO EXERCISE DISCRETION  
TO ACCEPT LATE FILED CLAIMS, (3) ESTABLISHMENT  
OF SEPTEMBER 23, 1999 AS THE ABSOLUTE FINAL BAR DATE  
AND (4) FORECLOSURE OF ALL CONTINGENT AND FUTURE CLAIMS

The Liquidator of the P.I.E. Mutual Insurance Company ("PIE") hereby gives notice of the following: 1. the bar date in the PIE liquidation proceeding has been extended to September 23, 1999; 2. the Liquidator has decided not to exercise discretion to accept any late filed claims, for any reason; 3. therefore, September 23, 1999 is the Absolute Final Bar Date in this case; and 4. all Contingent Claims and Future Claims, as defined below, are barred and foreclosed after September 23, 1999. The Court of Common Pleas, Franklin County Ohio, Case No. 97CVH12-10867, entered an order on February 17, 1999 (the "Order") which, among other things, approved this Notice and provided for the four items described in the preceding sentence.

The Order provides that the bar date for filing claims in the PIE liquidation proceeding has been extended to **September 23, 1999**. The Order, among other things, also (a) approves the Liquidator's decision not to exercise discretion pursuant to R.C. § 3903.35(B) and (D), so that no contingent, future or late filed claims will be accepted; (b) approves that September 23, 1999 is the Absolute and Final Bar Date in the PIE liquidation proceeding; (c) provides that all "Contingent Claims" and "Future Claims," defined below, are barred and foreclosed after September 23, 1999; (d) orders that any attempted filing of either (1) a Contingent or Future Claim on or before September 23, 1999, or (2) any claim after the September 23, 1999 Absolute Bar Date, shall not be considered, no written notice of denial under R.C. § 3903.39 need be issued and the filer of such a claim shall not be entitled to any hearing on the claim; (e) orders that if any Notice is returned as undeliverable to the Liquidator, he shall have no further obligation to attempt to locate a correct address and (f) includes a certification that there is no just reason for delay under Civil Rule 54(B), so that the Order is a final order subject to immediate appeal.

"Contingent Claims" are claims which have not yet fully developed and ripened into actual, litigated claims. A claim is a Contingent Claim unless an actual lawsuit has been filed as to the claim or unless the claimant has made a formal written demand for payment on the claim, which demand specifically describes the circumstances of the incident in sufficient detail to both (a) describe a matured, legitimate claim and (b) support a complaint based solely on the information contained in the demand. Contingent Claims include, but are not limited to, (a) potential claims evidenced by reports, notices and incidents which are not formal demands for payment, or reported on the basis that the claim may mature at some future time; (b) claims with insufficient detail to evidence that an actual claim exists; (c) claims in cases reopened and reported after September 23, 1999 and (d) claims of minors not asserted or legally perfected on or before September 23, 1999. "Future Claims" are claims which are presently unknown to the creditor, which arise from and after September 23, 1999.

**In order to share in any pro rata distribution from the PIE liquidation proceeding, all PIE claimants, insureds and creditors must file their proofs of claim with the Liquidator on the appropriate Proof of Claim forms, so that they are received by the Liquidator on or before SEPTEMBER 23, 1999. The Proof of Claim must be accompanied and supported by sufficient documentation, such as a copy of the complaint or other written notice that a creditor has received from a claimant, to evidence that the claim is not a Contingent Claim or a Future Claim (as defined herein) and that the claim actually exists as of the date the Proof of Claim is filed. Unless a proof of claim is delivered to the Liquidator on or before September 23, 1999 accompanied by sufficient supporting information to evidence that the claim actually exists, the claim of that creditor will be foreclosed and forever barred. Contingent and Future Claims will not participate in any pro rata distribution from the PIE liquidation proceeding even if an unsupported proof of claim is submitted on or before September 23, 1999.**

If documents supporting your claim have been lost or destroyed, you should submit the proof of claim along with a statement of the facts and circumstances of such loss or destruction, made under oath.

**All proof of claim forms and the required documentation regarding claims must be received on or before September 23, 1999 and should be submitted to:**

**Office of the Ohio Insurance Liquidator  
1366 Dublin Road  
Columbus, Ohio 43215**

Please be advised that this Notice does NOT affect any creditor who has already filed a Proof of Claim and who has sufficiently documented that an actual claim exists. If you have already filed a Proof of Claim, with appropriate attached documentation, you do not need to take any additional action to preserve your claim. If you have already filed a proof of claim for a Contingent Claim or a Future Claim, you must submit evidence that an actual claim exists no later than September 23, 1999, or your claim will be barred and foreclosed.

Be advised that you must advise the Liquidator, in writing, at the address above, of any change of address. **Failure to advise the Liquidator of a change of address may, and probably will, result in denial of your claim.**

**Finally, please be further advised that, due to the Rule 54(B) certification in the Order, the Order is a final order subject to appeal within thirty (30) days of February 17, 1999. If the Order is not timely appealed, or if the Order is upheld on appeal, you will have no further right to any court hearing as to any claim you might file either (a) after September 23, 1999, (b) that is not supported by sufficient supporting documentation or (c) that is a Contingent Claim or a Future Claim, and any such claim will not be accepted for filing, the claim will not be considered and the creditor filing such claim will not receive any notice of the denial of the claim and will not have the right to a hearing on such claim.**