

IN THE COURT OF COMMON PLEAS  
FRANKLIN COUNTY, OHIO

MARY JO HUDSON, :  
Ohio Superintendent of Insurance, :  
in her capacity as Liquidator of : Case No. 00CVH-11-9867  
Credit General Insurance Company and :  
Credit General Indemnity Company : Judge Pfeiffer  
:  
Plaintiff, :  
:  
v. :  
:  
Credit General Insurance Company, et :  
al., :  
:  
Defendants. :

FILED  
COMMON PLEAS COURT  
FRANKLIN CO., OHIO  
2009 MAR -6 PM 3:35  
CLERK OF COURTS

**PLAINTIFF'S MOTION FOR ORDER APPROVING A NEW SERVICE LIST**

Plaintiff, Mary Jo Hudson, Ohio Superintendent of Insurance in her capacity as the court-appointed liquidator ("Liquidator") of Credit General Insurance Company and Credit General Indemnity Company (collectively referred to herein as "CGIC"), hereby moves the Court for an Order that:

- (a) approves the Liquidator removing those companies and individuals from the original CGIC service list who voluntarily consented to such removal, and approves the Liquidator sending via email courtesy copies of pleadings to those persons identified on Exhibit A who are on the original CGIC service list and who have voluntarily agreed to be removed from the service list and instead receive pleadings in this manner; and
- (b) approves the Liquidator removing the companies and individuals named on Exhibit B from the CGIC service list;

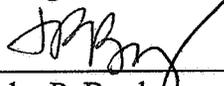
(c) approves a new CGIC service list, Exhibit C, to be used from the date the Order is entered until further notice.

The basis for this motion is more fully stated in the attached memorandum in support. For the Court's convenience, a proposed Order has been submitted with this Motion.

Respectfully submitted,

RICHARD CORDRAY  
Attorney General of Ohio

By Outside Counsel:  
KEGLER BROWN HILL & RITTER  
A Legal Professional Association



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*Attorneys for Plaintiff Mary Jo Hudson, in  
her capacity as Liquidator for Credit  
General Insurance Company and Credit  
General Indemnity Company*

## MEMORANDUM IN SUPPORT

A large number of persons intervened in this case at or near the time this Court entered the Liquidation Orders in this case on December 12, 2000 (Credit General Indemnity Company) and January 5, 2001 (Credit General Insurance Company) due to jurisdictional disputes arising early in this unique case and resulting from a pending sale motion as well as a simultaneous involuntary bankruptcy proceeding commenced in the United States Bankruptcy Court for the District of Delaware against Credit General's holding company. These intervenors became part of the CGIC Service List and have been receiving notice of all pleadings in this case since 2001. Since 2001, however, the jurisdictional and other disputes that affected the vast majority of the intervenors at the beginning of this case have been resolved in litigation or settlement.

Because many of the intervenors no longer have an active interest in the CGIC liquidation, the Liquidator determined that time and money could be saved if the service list was reduced. To that end, the Liquidator's staff contacted all persons on the original service list and asked each person whether the party they represent would agree to be removed from the service list. The Liquidator offered each party the option of accepting courtesy copies of pleadings by email. The removal from the service list will not affect the Liquidator's duty or procedure to notify any claimant with a proof of claim of the determination of that party's proof of claim. The removal impacts only the mass service of all pleadings in the case on all persons on the service list.

A large number of those contacted agreed to removal from the list as their business with the estate is concluded. Many of those persons agreed to be removed from the service list on the condition that the Liquidator send courtesy copies of pleadings by

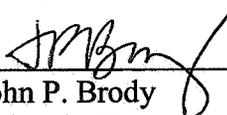
email. (*See Exhibit A*). Attached as Exhibit B, however, are those intervenors that have not responded to the Liquidator and who do not appear to have an active interest in proceedings in this Court. Accordingly, the Liquidator is requesting this Court allow those entities and individuals as set forth on Exhibit B to be removed from the service list. The proposed new service list is attached as Exhibit C, and it reflects removal of all persons who agreed to be removed from the service list. The proposed new service list greatly reduces the original list because the vast majority of persons on the original service are agreeable to receiving courtesy copies of the pleadings by email, thus allowing for additional cost savings by the estate.

For the reasons set forth above, the Liquidator request this Court issue an order approving the new service list, attached as Exhibit C.

Respectfully submitted,

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**EXHIBIT A**  
**CGIC COURTESY COPY E-MAIL LIST**

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**EXHIBIT B**  
**NO RESPONSE TO LIQUIDATOR'S INQUIRY REGARDING SERVICE LIST**  
**MOTION REQUESTS THAT THE COURT ORDER**  
**THESE PERSONS REMOVED FROM SERVICE LIST**

Atlantic Risk Services  
Three Giralda Farm  
Madison, NJ 07940

Tammy Richison  
ASU Risk Management  
2120 University Park Drive  
Okemos, MI 48805-0077

Harry Baumgartner  
GAB Robins  
10010 Cobblestone Dr.  
Irwin, PA 15642-5527

CNA Insurance  
Attn: Law Department  
CNA Plaza, Suite 285  
Chicago, IL 60685

Tonna Dowan  
Cunningham Lindsey  
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Ste. 130  
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Dave Magin  
Intercare Insurance Services  
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**EXHIBIT C**  
**NEW CGIC SERVICE LIST**

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Anchor Claims Management  
P.O. Box 819045  
Dallas, TX 75381-9045

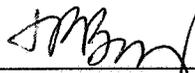
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Glendale, CA 91203

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and accurate copy of the foregoing *Plaintiff's Motion for Approval of a New Service List* was served upon all interested parties on the attached service list as of March 6, 2009, via Regular Mail, postage prepaid, on this 6<sup>th</sup> day of March, 2009.



---

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## SERVICE LIST AS OF 3/6/09

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