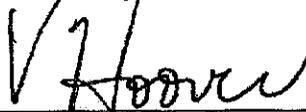


Respectfully submitted,

MIKE DEWINE
Attorney General State of Ohio

By Special Counsel:
KOHLMAN, JACKSON & KRANTZ, PLL



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*Attorneys for the Liquidator of The Guarantee Title and
Trust Company*

MEMORANDUM IN SUPPORT

Since the inception of the GTT liquidation proceedings, the Liquidator has, among other duties, preserved and reviewed the books and records of GTT. Also as part of the administration of this Estate, the Liquidator transferred the majority of GTT's records which were previously located in Prairie Village, Kansas; Cincinnati, Ohio and Pace, Florida to the Liquidator's leased offices and warehouse facilities in Columbus, Ohio. The GTT Estate is charged monthly rent as a Class 1 administrative expense for its use of square feet in those facilities pursuant to the GOE formula set forth in this Court's Order of January 12, 2011 approving the Liquidator's updated Administrative Operating Procedure.

I. RELIEF FROM RETENTION AND AUTHORITY TO DESTROY CERTAIN GTT ESTATE RECORDS

The Liquidator will make a final distribution of the GTT Estate on June 22, 2011 and then plans to proceed to close the GTT estate on or around September 30, 2011. In preparation for the closing of the GTT liquidation estate, the Liquidator now requests the Court to relieve her of any obligation to retain certain documents and to authorize her to destroy the majority of records that will not be useful in the remaining administration of the GTT liquidation estate. To this end, Ohio Revised Code ("O.R.C.") § 3903.48 provides:

Whenever it shall appear to the superintendent of insurance that the records of any insurer in process of liquidation or completely liquidated are no longer useful, he may recommend to the court and the court shall direct what records should be retained for future reference and what should be destroyed.

The categories of records the Liquidator has identified as no longer useful and recommends for immediate, pre-closing destruction are as follows:

1. All documents imaged by Visual Evidence pursuant to this Court's orders in this case.

The Liquidator has fulfilled her fiduciary duty to policyholders, creditors, and claimants by determining that the documents are no longer of value as they are not required to administer the GTT liquidation estate and the documents can be destroyed.

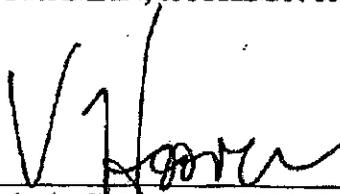
III. CONCLUSION

For the reasons set forth in this memorandum and motion, the Liquidator requests this Court for an Order authorizing the Liquidator to destroy certain records of the GTT Liquidation Estate that have not been used and will not be used to administer the GTT liquidation estate. A proposed Order is attached as Exhibit A to this motion and memorandum.

Respectfully submitted,

MIKE DEWINE
Attorney General State of Ohio

By Special Counsel:
KOHRMAN, JACKSON & KRANTZ, PLL

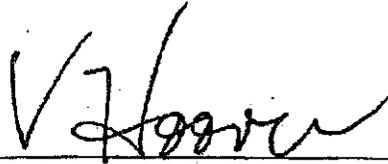


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CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT IN ACCORDANCE WITH PARAGRAPH 41 OF THE LIQUIDATION ORDER, A TRUE AND ACCURATE COPY OF THE *PLAINTIFF'S MOTION FOR AUTHORITY TO DESTROY CERTAIN RECORDS OF THE GUARANTEE TITLE AND TRUST COMPANY* WAS POSTED ON THE LIQUIDATOR'S WEBSITE (www.ohliq.com) SUBSTANTIALLY CONTEMPORANEOUS WITH THE FILING.



Valoria C. Hoover (0059596)

IN THE COURT OF COMMON PLEAS
FRANKLIN COUNTY, OHIO

MARY TAYLOR,
Superintendent of Insurance
in her Capacity as Liquidator of
The Guarantee Title and Trust Company,

Plaintiff,

vs.

The Guarantee Title and Trust Company,

Defendant.

CASE NO. 08CVH07-10725

JUDGE GUY L. REECE, II

**ORDER GRANTING PLAINTIFF'S MOTION FOR AUTHORITY TO DESTROY
CERTAIN RECORDS OF THE GUARANTEE TITLE AND TRUST COMPANY**

This matter came before the Court upon the motion ("Motion") of Mary Taylor, Ohio Superintendent of Insurance, in her capacity as the Liquidator of The Guarantee Title and Trust Company ("GTT"), for authority to destroy certain GTT records relating to matters no longer useful to the final administration and closure of the GTT liquidation estate. No party objected to the Motion. Upon consideration of the Liquidator's Motion and Memorandum in Support, the Court finds the Motion is well taken and it is hereby:

ORDERED, ADJUDGED AND DECREED that the Motion is granted in its entirety.

IT IS FURTHER ORDERED pursuant to R.C. 3903.48 that the Liquidator is hereby authorized to immediately destroy the following GTT and Liquidator books and records:

1. All documents imaged by Visual Evidence pursuant to this Court's orders.

IT IS SO ORDERED.

Dated: _____, 2011

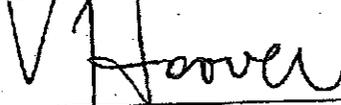
Guy L. Reece II, JUDGE



APPROVED:

MIKE DEWINE
Attorney General State of Ohio

By Special Counsel:
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