

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

FILED
CLERK OF COURTS
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FRANKLIN COUNTY, OHIO

PLAINTIFF'S MOTION AND APPLICATION FOR ORDER APPROVING THE LIQUIDATOR'S SUPPLEMENTAL FINAL REPORT OF CLAIMS AND AUTHORIZING FINAL DISTRIBUTION, AND TERMINATING THE LIQUIDATION PROCEEDINGS OF THE GUARANTEE TITLE AND TRUST COMPANY

Plaintiff, Mary Taylor, Ohio Superintendent of Insurance in her capacity as Liquidator (the "Liquidator") of The Guarantee title and Trust Company ("GTT"), respectfully requests the following:

1. Pursuant to R.C. 3903.42, 3903.43 and 3903.44 and related sections, an Order approving the Liquidator's Supplemental Final Report of Class 2 Claims ("Supplemental Report"), which is attached and incorporated by reference as Exhibit A (redacted), including the determinations of the amounts and the class of each claim as set forth in Exhibit A, and authorizing the Liquidator to make a 33.4375% final distribution from the remaining assets of GTT to these claimants in Class 2 (as defined in R.C. 3903.42) on their allowed claims via cashier's checks to be issued on September 27, 2011; and
2. Pursuant to R.C. 3903.46 and related sections, a Final Closing Order discharging the Liquidator and making other provisions to close this liquidation estate including

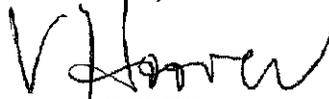
termination of this case effective immediately following the final supplemental distribution, which will occur no later than September 30, 2011.

A Memorandum in Support is attached.

Respectfully submitted,

MIKE DEWINE
Attorney General State of Ohio

By Outside Counsel:
KOHRLMAN, JACKSON & KRANTZ, PLL



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

MEMORANDUM IN SUPPORT

On October 27, 2008, this Court issued an Order declaring The Guarantee Title and Trust Company ("GTT") insolvent, ordering GTT liquidated and appointing the Ohio Superintendent of Insurance as Liquidator. During the course of this liquidation proceeding, the Liquidator thoroughly reviewed the books and records of GTT, and identified and collected, where reasonable, all known assets of GTT as reported on the Liquidator's periodic accountings filed with this Court. The Liquidator also reviewed, classified and determined all timely proofs of claim submitted in the GTT liquidation and made a final distribution to Class 2 claimants in accordance with R.C. Chapter 3903, particularly R.C. 3903.39, 3903.42, 3903.43 and 3903.44 and the prior orders of this Court. The Liquidator now seeks an order pursuant to R.C. 3903.46(A) discharging the Liquidator and terminating the liquidation and this case.

I. Liquidator's Supplemental Report of Class 2 Claims

R.C. 3903.42 establishes the priority classification of claims in an insurance liquidation case. The statute establishes nine classes of claims. On May 12, 2011, this Court approved the Liquidator's Final Report of Claims in Classes 4 through 9, as those classes are defined in R.C. 3903.42. The assets of GTT's liquidation estate were and remain insufficient to make any distribution to claimants in Classes 4 through 9. There are no Class 3 claimants in this liquidation. On June 8, 2011, this Court approved the Liquidator's Final Report of Claims in Class 2 under R.C. 3903.43, and approved a pro rata distribution of GTT liquidation estate assets in amount of 33.4375% of the amount of each allowed Class 2. The Estate made that distribution beginning on or around June 22, 2011.

Thereafter, the Liquidator discovered that six (6) Class 2 proofs of claim that were filed before the absolute final bar date were inadvertently omitted from the Liquidator's Final Report

of Claims in Class 2 that the Liquidator filed on June 1, 2008 and this Court approved on June 8, 2011. Therefore, the Liquidator is filing a Supplemental Final Report of Class 2 Claims ("Supplemental Claims") in order to report the omitted claims pursuant to R.C. 3903.43(A) and seek authority to make the same 33.4375% pro rata distribution to the supplemental Class 2 claimants that was made to all other Class 2 claimants. The Supplemental Report (redacted) is attached and incorporated by reference as Exhibit A.

The Liquidator respectfully requests an order approving the Supplemental Report, including the determinations of the amounts and the classes of each claim, and authorizing the Liquidator's final distribution in the total amount of \$2,511.50 via cashier's checks to the supplemental Class 2 claimants as a 33.4375% pro rata distribution on the supplemental Class 2 allowed claims, as specifically reflected in Exhibit A. Prior to filing this Application, the Liquidator contacted each Class 2 claimant that is identified on the Supplemental Report or the claimant's counsel and obtained the claimant's agreement as to the class and value of the claimant's claim, as well as the distribution via cashier's checks.

Consistent with the Liquidator's practice in this case and other recent cases, the names and addresses of the claimants are redacted in the Supplemental Report based on complaints the Liquidator received in other cases from claimants who reported that they had been contacted and questioned by claims buyers, neighbors, and others in connection with distributions. The Liquidator is attempting to respond to and protect all claimants by redacting their personal contact information from the publicly filed Reports of Claims in this and other liquidation cases. The claimants' names and addresses will be disclosed *in camera* to the Court and filed under seal with the Court to comply with the requirements of R.C. 3903.43.

The Liquidator will post on her website at www.ohliq.com under Open Liquidations – Guarantee Title and Trust, this Application and the Exhibits. The redacted Exhibit A, will be posted on the Liquidator's website in the form of a searchable PDF so that the claimants may search for information about their claims using their Proof of Claim (Liquidator) Number. The website also explains that claimants may call the Liquidation Office if they have questions about the Supplemental Report or their claim.

II. Discharge, Dissolution and Closure

Additionally, the Liquidator requests the Court for a Final Closing Order discharging the Liquidator, dissolving GTT, making other provisions to close the GTT liquidation estate and terminating this case. R.C. 3903.46(A) provides:

When all assets justifying the expense of collection and distribution have been collected and distributed under sections 3903.01 to 3903.59 of the Revised Code, the liquidator shall apply to the court for discharge. The court may grant the discharge and make any other orders, including an order to transfer any remaining funds that are uneconomic to distribute, as may be appropriate.

The Liquidator has reviewed the books and records of the GTT estate and determined that all matters involving the estate have substantially been finalized, other than several ministerial functions set forth in the following sections which cannot be performed until after the closing of the liquidation is ordered.

A. Final Accounting and Final Auditor's Report

The primary post-closure, ministerial functions include the preparation of a final accounting and a final independent auditor's report of the estate, in the form of previous auditor's reports submitted to this Court. The Liquidator will file this accounting and auditor's report with the Court upon the completion of each report.

B. 2011 and 2012 Tax Returns

A GTT 2011 tax return will be prepared and filed with the Internal Revenue Service ("IRS") in 2012. Because the final distribution will take place in 2011 and the GTT estate will be finally closed in 2011, a final GTT tax return must be prepared and filed with the IRS in 2012.

C. Recoupment Claims

GTT has recoupment claims and similar collections that technically remain open, including the Frantz, Evans and Fletcher claims, because they are not fully collected ("uncollected claims"). These uncollected claims existed for many years prior to GTT's liquidation, but little or no collections occurred prior to liquidation. The Liquidation Estate has not realized meaningful collections on these uncollected claims post-liquidation.¹ Given the cost of administering an open estate, attempting to collect on probably uncollectable claims whose value is possibly minimal; it is the Liquidator's judgment that no further attempts at asset collection or recovery are warranted or likely to produce any positive result for the estate. Prompt closure of the estate is the best strategy for maximizing the value of the assets available for timely distribution to claimants. Therefore, the Liquidator requests authority to abandon uncollected recoupment and collection claims and to execute any releases or other papers to facilitate the abandonment.

D. Abandonment of Remaining Physical Assets

The Liquidator attempted to sell the few physical assets of GTT, including artwork and a microfiche machine. The Estate received minimal recoveries on those assets, as reflected in the periodic accountings filed in this case. Given the cost of administering an open Estate, and the

¹ The estate has received recoupment recoveries on recoupment claims that are now closed. The estate's total recoupment recoveries are reflected in the periodic accountings filed in this case.

cost of attempting to collect and possibly receive minimal, if any, additional funds for the minimal remaining physical assets of the Estate, it is the Liquidator's judgment that no further attempts at asset collection or recovery from the physical assets are warranted or likely to produce any positive impact for the estate. Prompt closure of the estate is the best strategy for maximizing the value of the assets available for timely distribution to claimants. Therefore, the Liquidator requests authority to abandon all remaining physical assets of GTT.

E. Disposition of Insurer's Records and Report on Court's Preservation Order

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 Liquidator requests that this Court relieve her of any obligation she may have to retain and authorize her to immediately destroy: (1) all remaining pre-liquidation books and records in any medium; and (2) all post-liquidation books and records in any medium that the Liquidator determines are no longer essential, or that are not required to be maintained pursuant to applicable federal and state records retention requirements. The Liquidator further requests an order directing that all other books and records in any medium shall be destroyed on or after the date three (3) years following the date the order granting this application is entered. Finally, the Liquidator requests an order finding that the Liquidator has no duty or obligation to preserve books, records or documents in any medium or anything else related to GTT as possible discovery or evidence in any litigation or contested matter.

F. Unclaimed Funds

R.C. 3903.45 governs the distribution of unclaimed funds. The statute contemplates a distribution of unclaimed funds to other GTT claimants to whom it is possible to make an immediate payment pursuant to the priorities in R.C. 3903.42. In this case, unclaimed funds represent returned or uncashed distribution checks. It is not possible or appropriate in this case to redistribute the unclaimed funds pro-rata to all Class 2 claimants. These claimants are primarily banks and law firms. The Liquidator contacted these claimants requesting that the claimant cash the checks prior to closure to ensure timely distribution. Some of the claimants or their representatives responded with timely requests to reissue checks. The Liquidator expects some or all of those checks to clear prior to closing of GTT's bank accounts. In addition, the cost of a redistribution, including the costs of keeping the estate open to accomplish it, would exceed the amount of the unclaimed funds.

R.C. 3903.46(A) grants this Court discretion to make an alternative order where, as here, remaining funds are uneconomic to distribute. Consistent with this Court's treatment of such funds in other cases, the Liquidator proposes that the Court order the Liquidator to transfer all unclaimed funds representing up to twelve (12) distribution checks totaling up to \$163,031.77 exclusively to the Ohio Department of Commerce, Division of Unclaimed Funds to hold and to allow the claimants to search for, identify, and claim funds. This proposal is consistent with R.C. 3903.45(A), which contemplates distribution of unclaimed funds to this estate's claimants, and also with the Liquidator's treatment of unclaimed distribution checks in prior closed liquidation cases.

G. Dissolution of GTT

Pursuant to R.C. 3903.20, the corporate entity of GTT is dissolved by operation of law once the Liquidator is discharged under R.C. 3903.46(A).

H. Closing GTT Bank Accounts and Future Administrative Expenses

Once an estate is closed and the corporate entity dissolved, no entity will exist to hold the GTT bank accounts. The Liquidator therefore closes the bank accounts upon closure of the estate. In this case, unlike many others, the Liquidator is prepared to close the GTT Estate and its bank accounts immediately following the final distribution via cashier's checks to the few remaining claimants in Class 2 as reflected in the Supplemental Report.

The only funds that will be in GTT bank account at the time the Estate is closed will be the remainder from the reserve for administrative expenses after May 22, 2011 ("reserve"). This Court approved the reserve for administrative expenses on June 8, 2011 in the amount of \$53,948.15. The reserve will be administered and accounted for pursuant to paragraph 3 on page 8 of the Administrative Expense Operating Procedure applicable to Closed and Closing Estates that was updated and approved on December 21, 2010 in the LMI Liquidation Case, Case No. 00CVH03-2431 ("AOP"), and approved by the Court in this case on January 12, 2011. As of the time of filing this Application, \$24,275.68 remains of the \$53,948.15 reserve. This sum will decrease between the filing of this Application and the date of closing. Accordingly, the actual amount of remaining GTT funds² at the time of closing (which will be approximately \$24,275.68) will be prepaid to LMI Insurance Company, in Liquidation ("LMI") upon closure of this case in exchange for the LMI Estate's assumption, administration and payment of the remaining administrative expense obligations of the GTT Estate. The payment and receipt of

² Some administrative expenses have been incurred and paid by the GTT Estate since May 22, 2011 and prior to closing the estate from the \$53,948.15 reserve. Other administrative expenses will not be incurred until after the GTT Estate is closed, as explained above.

these remaining funds between the GTT Estate and the LMI Estate will be reported respectively in the GTT final accounting and the LMI periodic accountings, but the expenditure of the transferred funds will not be separately tracked, accounted for or reported pursuant to the provisions of paragraph 3 on page 8 of the AOP.

III. Conclusion

For the reasons described in the Liquidator's Motion and Memorandum, the Liquidator respectfully requests that this Court enter an Order as follows:

1. Pursuant to R.C. 3903.43(A) and 3903.44, approving the Liquidator's Supplemental Report of Claims in Class 2 attached to this Motion and Application as Exhibit A, including the determinations of the amounts and class of each claim as set forth therein, and ordering the Liquidator to make a final distribution of GTT's remaining assets via cashier's check in the amounts set forth in Exhibit A issued and mailed to each of those claimants or their designees.
2. Pursuant to R.C. 3903.42 and R.C. 3903.46(A), approving the prepayment of the amount remaining from the reserve from the assets of the GTT estate for the Liquidator's payment of administrative expenses after May 22, 2011. As of the time of the filing of this Application, \$24,275.68 of this sum remains because of the payment by GTT from the \$54,948.25 reserved funds for some closing related administrative expenses occurring since May 22, 2011 and prior to closure of the estate. The Liquidator requests an order pursuant to R.C. 3903.42 and R.C. 3903.46(A) approving the Liquidator's pre-payment of GTT's remaining reserve funds at the time of closure to LMI for the GTT estate's unpaid administrative expenses related to the closure of the GTT estate. The payment and receipt of these funds shall be reported respectively in the GTT final accounting and the LMI periodic accountings, but the expenditure of it will not be separately tracked, accounted for or reported as provided in the provisions of paragraph 3 on page 8 of the AOP which applies to Closed and Closing Estates.
3. Finding that unclaimed funds are not economic or appropriate to redistribute and that without waiver of applicable exemptions from the unclaimed funds statutes, the Liquidator shall transfer all unclaimed funds representing uncashed or returned distribution checks exclusively to the Ohio Department of Commerce, Division of Unclaimed Funds to hold and to allow claimants to search for, identify, and claim funds. Upon such transfer, the Liquidator shall have no obligation to report unclaimed funds of the GTT estate or the absence thereof.
4. Pursuant to R.C. 3903.46(A), authorizing the Liquidator or her designee to retain limited authority for the following purposes: (a) filing a final accounting with the

Court; (b) filing a final audit report with the Court; (c) executing the GTT 2011 and 2012 tax returns and filing the returns with the Internal Revenue Service in the manner provided by law; and (d) taking all related actions as authorized or as deemed necessary and appropriate by the Liquidator to close the GTT liquidation estate and carry out various sections of R.C. Chapter 3903 and the orders of this Court.

5. Pursuant to R.C. 3903.46(A) and related sections, authorizing the Liquidator to immediately close GTT's bank accounts.
6. Pursuant to 3903.20, that the corporate entity of GTT is hereby dissolved and liens against the company, if any, are removed and nullified.
7. Pursuant to R.C. 3903.46(A) and 3903.48, approving and authorizing the destruction of the GTT and Liquidator books and records in any medium as follows: (a) all remaining pre-liquidation books and records in any medium, shall be immediately destroyed; (b) all remaining post-liquidation books and records in any medium that the Liquidator determines are no longer essential, or that are not required to be maintained shall be immediately destroyed; (c) all other books, records and documents in any medium shall be destroyed on or after the date three (3) years following the date of the order granting this application; and (d) finding that the Liquidator has no duty or obligation to preserve books, records or documents in any medium or anything else related to GTT as possible discovery or evidence in any litigation or contested matter.
8. Pursuant to R.C. 3903.46(A), finding that GTT's remaining physical assets are uneconomic to distribute, and approving and authorizing the Liquidator to abandon such physical assets.
9. Pursuant to R.C. 3903.46(A), ordering the abandonment of uncollected recoupment and other claims and authorizing the Liquidator to execute any releases or other papers necessary to effectuate the abandonment.
10. Pursuant to R.C. 3903.46(A) and R.C. 3903.07, discharging the Liquidator and providing protections afforded under R.C. 9.86, 9.87, 109.36 to 109.366 [109.36.6] to the Liquidator, her predecessors and successors, any and all former and current deputy liquidators, any former and current employee of the Ohio Department of Insurance, any former or current employee appointed by the Superintendent as Liquidator, and any former or current employee who serves under the Liquidator.
11. Pursuant to R.C. 3903.46(A) and R.C. 3903.07, releasing the Liquidator her predecessors, successors and any and all deputy rehabilitators, deputy liquidators, agents or employees of the Liquidator and employees of the Ohio Department of Insurance, of all claims and liability of any nature whatsoever and whenever incurred (including but not limited to costs, expenses and attorneys' fees) relating to, involving or arising out of any and all actions, decisions, conduct, transactions,

or events that were alleged or that could have been alleged in the GTT rehabilitation and liquidation proceedings or in any other litigation that in any way relates to or involves GTT, the GTT rehabilitation and liquidation proceedings, or any proceedings related to GTT or the GTT rehabilitation and liquidation proceedings.

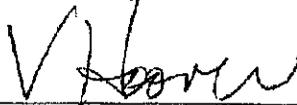
12. Finding that all other matters regarding the liquidation of GTT have been finalized in accordance with the Orders of this Court, and effective immediately following the distribution authorized herein, which will occur on September 27, 2011, the GTT liquidation estate is closed and this case is terminated.

A proposed Order is attached as Exhibit B to this Memorandum in Support.

Respectfully submitted,

MIKE DEWINE
Attorney General State of Ohio

By Outside Counsel:
KOHRMAN, JACKSON & KRANTZ, PLL

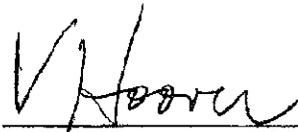


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Attorneys for the Liquidator of The Guarantee Title and Trust Company

CERTIFICATE OF SERVICE

I certify that in accordance with paragraph 41 of the Liquidation Order, a true and accurate copy of the Plaintiff's Motion and Application for Order Approving the Liquidator's Supplemental Final Report of Claims and Authorizing Final Distribution, and Terminating the Liquidation Proceedings of the Guarantee Title and Trust Company was posted on the Liquidator's website (WWW.OHLIQ.COM) substantially contemporaneous with the filing.



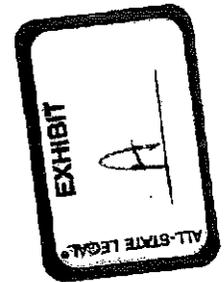
Valoria C. Hoover (0059596)

GUARANTEE TITLE & TRUST - FINAL CLAIMS REPORT
Proof of Claims - Class 02
Determined Value Distribution Report
Distribution Percentage 33.4375%

14800

Liq/Seq#	Claim#	Payee/Address	Determined Value	Distribution %	Total Distribution Payment	Less: Prev Payments/Allow	Check Amount
21001872 01	20085719CQ		.00	33.4375%	.00	.00	.00
21001876 01	20085726CQ		727.50	33.4375%	243.26	.00	243.26
21068096 01	20095880CQ		615.00	33.4375%	205.64	.00	205.64
21071147 01	20085182		.00	33.4375%	.00	.00	.00
21071148 01	20085777CQ		1,169.00	33.4375%	390.84	.00	390.84
34071096 01	20084110		.00	33.4375%	.00	.00	.00
Grand Totals:			62,311.50		9839.78	9.00	9839.78

Count: 6



**IN THE COURT OF COMMON PLEAS
FRANKLIN COUNTY, OHIO**

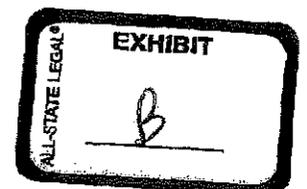
MARY TAYLOR,	:	
Superintendent of Insurance	:	CASE NO. 08CVH07-10725
in her Capacity as Liquidator of	:	
The Guarantee Title and Trust Company,	:	
	:	JUDGE GUY L. REECE, II
Plaintiff,	:	
	:	
vs.	:	
	:	
The Guarantee Title and Trust Company,	:	
	:	
Defendant.	:	

**FINAL CLOSING ORDER GRANTING PLAINTIFF'S MOTION AND APPLICATION
FOR ORDER APPROVING LIQUIDATOR'S SUPPLEMENTAL REPORT OF CLASS 2
CLAIMS AND AUTHORIZING FINAL DISTRIBUTION, AND TERMINATING THE
LIQUIDATION PROCEEDINGS OF THE GUARANTEE TITLE AND TRUST
COMPANY**

This matter came to be heard upon the Liquidator's Motion and Application for Order Approving Liquidator's Supplemental Report of Class 2 Claims for Order Terminating the Liquidation Proceedings of The Guarantee Title and Trust Company ("GTT") Insurance Company ("Liquidator's Motion and Application"). Upon consideration of the Liquidator's Motion and Application and Memorandum in Support, as well as the record of proceedings in this case, the Court finds that the Motion and Application is well taken and it is hereby:

ORDERED, ADJUDGED and DECREED as follows:

1. The Liquidator's Motion and Application is GRANTED.
2. Pursuant to R.C. 3903.43(A) and 3903.44, the Liquidator's Supplemental Report of Class 2 Claims attached to the Motion and Application as Exhibit A, including the determinations of the amounts and class of each claim as set forth therein, is APPROVED. The Liquidator is ORDERED to make a final distribution of GTT's remaining assets via cashier's check in the amounts set forth in Exhibit A issued and mailed to each of those claimants or their designees.



3. Pursuant to R.C. 3903.42 and R.C. 3903.46(A), approving, as of the time of closing, the Liquidator's pre-payment of the remaining GTT reserve at the time of closing to LMI for the GTT estate's unpaid administrative expenses related to the closure of the GTT estate. The payment and receipt of these funds shall be reported respectively in the GTT final accounting and the LMI periodic accountings, but the expenditure of it will not be separately tracked, accounted for or reported as provided in which the provisions of paragraph 3 on page 8 of the AOP approved by this Court on January 12, 2011 which applies to Closed and Closing Estates.
4. The unclaimed funds of this estate are uneconomic to redistribute. The Liquidator shall transfer all unclaimed funds representing returned or uncashed distribution checks exclusively to the Ohio Department of Commerce, Division of Unclaimed Funds to hold and to allow the claimants to search for, identify, and claim funds. Upon closure of the GTT Estate, the Liquidator shall have no obligation to report unclaimed funds of the GTT estate or the absence thereof.
5. Pursuant to R.C. 3903.46(A), the Liquidator and her designee are authorized to retain limited authority for the following purposes: (a) filing a final accounting with the Court; (b) filing a final audit report with the Court; (c) executing the GTT 2011 and 2012 tax returns and filing the returns with the Internal Revenue Service in the manner provided by law; and (d) taking all related actions as authorized or as deemed necessary and appropriate by the Liquidator to close the GTT liquidation estate and carry out various sections of R.C. Chapter 3903 and the orders of this Court.
6. Pursuant to R.C. 3903.46(A) and related sections, the Liquidator shall proceed to close GTT's bank accounts following the final distribution as authorized in this order.
7. Pursuant to 3903.20, the corporate entity of GTT is hereby dissolved.
8. Pursuant to R.C. 3903.46(A) and 3903.48, the Court hereby approves, authorizes and ORDERS the destruction of the GTT and Liquidator books, records and documents as follows: (a) all remaining pre-liquidation books and records in any medium, shall be immediately destroyed; (b) all remaining post-liquidation books and records in any medium that the Liquidator determines are no longer essential, or that are not required to be maintained shall be immediately destroyed; (c) all other books, records and documents in any medium shall be destroyed on or after the date three (3) years following the date of this order; and (d) finding that the Liquidator has no duty or obligation to preserve books, records or documents in any medium or anything else related to GTT as possible discovery or evidence in any litigation or contested matter.
9. Pursuant to R.C. 3903.46(A), the Court finds that GTT's remaining physical assets are uneconomic to liquidate or distribute, and ORDERS that such physical assets are hereby abandoned.

10. Pursuant to R.C. 3903.46(A), the Court finds that all open recoupment and other collection claims are uneconomic to collect, and ORDERS the abandonment of uncollected claims and authorizes that the Liquidator to execute any releases or papers necessary to effectuate such abandonment.
11. Pursuant to R.C. 3903.46(A) and R.C. 3903.07, the Liquidator is hereby discharged and all protections afforded under R.C. 9.86, 9.87, 109.36 to 109.366 [109.36.6] are afforded to the Liquidator, her predecessors and successors, any and all former and current deputy liquidators, any former and current employee of the Ohio Department of Insurance, any former or current employee appointed by the Superintendent as Liquidator, and any former or current employee who serves under the Liquidator.
12. Pursuant to R.C. 3903.46(A) and R.C. 3903.07, the Liquidator her predecessors, successors and any and all deputy rehabilitators, deputy liquidators, agents or employees of the Liquidator and employees of the Ohio Department of Insurance, are hereby released of all claims and liability of any nature whatsoever and whenever incurred (including but not limited to costs, expenses and attorneys' fees) relating to, involving or arising out of any and all actions, decisions, conduct, transactions, or events that were alleged or that could have been alleged in the GTT rehabilitation and liquidation proceedings or in any other litigation that in any way relates to or involves GTT, the GTT rehabilitation and liquidation proceedings, or any proceedings related to GTT or the GTT rehabilitation and liquidation proceedings.
13. All other matters regarding the liquidation of GTT have been finalized in accordance with the Orders of this Court, and effective immediately following the final distribution authorized herein, the GTT liquidation estate is closed and this case is terminated.

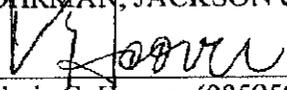
Date: September 27, 2011

JUDGE GUY L. REECE, II

APPROVED:

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By Outside Counsel:
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