

IN THE COURT OF COMMON PLEAS FRANKLIN COUNTY, OHIO

MARY JO HUDSON,  
Superintendent of Insurance,  
State of Ohio, Liquidator of  
The Oil & Gas Insurance Company

Plaintiff,

v.

THE OIL & GAS INSURANCE  
COMPANY,

Defendant.

CASE NO. 90CVH-05-3409

Judge Julie M. Lynch

**MOTION FOR APPROVAL OF PERIODIC ACCOUNTING OF LIQUIDATOR**

Mary Jo Hudson, Liquidator of The Oil & Gas Insurance Company, moves this Court for an Order approving the Statement of Receipts and Disbursements of the Liquidator for the period January 1, 2008 through June 30, 2008, as set forth in the attached Exhibit A. The grounds in support of this Motion are set forth in the accompanying Memorandum and in the Affidavit of Anne Thomson, Chief Deputy Liquidator, attached hereto as Exhibit B.

Respectfully submitted,

NANCY H. ROGERS  
Attorney General of Ohio

By Special Counsel:

  
Keith McNamara (0001098)  
88 E. Broad Street, Suite 1250  
Columbus, Ohio 43215  
(614) 228-6131/FAX 228-6126  
Attorney for Mary Jo Hudson in  
her capacity as Liquidator of The  
Oil and Gas Insurance Company

FILED  
COMMON PLEAS COURT  
FRANKLIN CO. OHIO  
2008 SEP 22 PM 12:04  
CLERK OF COURTS

## MEMORANDUM IN SUPPORT

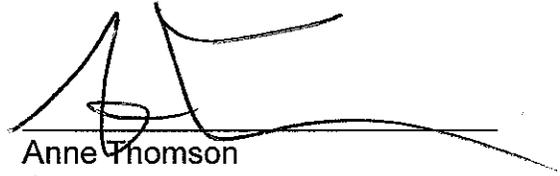
The Liquidator requests that this Court approve the Statement of Receipts and Disbursements of the Liquidator for the period January 1, 2008 through June 30, 2008. These receipts and expenditures are described and set forth in the Attached Exhibit A and the Affidavit of Anne Thomson, Chief Deputy Liquidator, attached hereto as Exhibit B.

On August 31, 1990, The Oil & Gas Insurance Company ("OGICO") was declared insolvent and placed in liquidation and the Ohio Superintendent of Insurance was appointed as Liquidator. Section 3903.21 of the Ohio Revised Code and the Liquidation Order direct the Liquidator to take possession of and liquidate all property and assets of OGICO, to collect all debts and monies due OGICO, and to pay reasonable compensation to persons employed to assist with the liquidation and defray from the funds or assets of the insurer all expenses of taking possession of, conserving, conducting, liquidating, disposing of or otherwise dealing with the business property of the insurer.

The liquidation Order and Section 3903.18(E) of the Ohio Revised Code provide that the Liquidator must submit periodic accountings to the Court. Such accountings assist the Court in monitoring the progress and status of the Liquidation and, in particular, the receipts and disbursements in the OGICO liquidation proceedings.

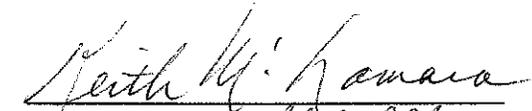


and disbursements made by the Liquidator from January 1, 2008 through  
June 30, 2008.



Anne Thomson  
Chief Deputy Liquidator

Sworn to and subscribed in my presence this 18 day of Sept, 2008.



Keith W. Kamara  
Notary Public - State of Ohio  
Lifetime Commission