

**PROLIANCE INSURANCE COMPANY,  
IN LIQUIDATION**

**NOTICE OF (1) ESTABLISHMENT OF JANUARY 3, 2011 AS THE ABSOLUTE FINAL BAR DATE; (2) BAR AND FORECLOSURE OF ALL BLANKET, FUTURE AND UNSPECIFIED CLAIMS; AND (3) LIQUIDATOR'S DETERMINATION NOT TO ACCEPT CLAIMS AFTER ABSOLUTE FINAL BAR DATE**

The Liquidator of Proliance Insurance Company ("Proliance") hereby gives notice of the following: (1) an Absolute and Final Bar date in the Proliance liquidation proceeding has been established, which is **January 3, 2011** (the "**Absolute Final Bar Date**"); (2) the Liquidator has decided not to exercise her discretion to accept any claims after the **Absolute Final Bar Date**; (3) all Blanket, Unspecified and Future Claims, as defined below, are barred and foreclosed; (4) the Court of Common Pleas of Franklin County, Ohio, in Case No. 00CVH12-11391 (the "Liquidation Court"), entered an order on December 6, 2010 (the "Order") which, among other things, approved this Notice and provided for the three items described in the preceding sentence.

The Order provides that the **Absolute Final Bar Date** in the Proliance liquidation proceedings has been established and is **January 3, 2011**. The Order, among other things, also:

(a) approves the Liquidator's determination not to exercise her discretion pursuant to R.C. 3903.35(B) and (D), so that after the **January 3, 2011 Absolute Final Bar Date**, the Liquidator will not accept any claims or any requests for Proof of Claim forms;

(b) approves **January 3, 2011 as the Absolute and Final Bar Date** in the Proliance liquidation proceeding;

(c) provides that all "**Blanket Proof of Claims,**" all "**Unspecified Claims**" and all "**Future Claims,**" as defined below, are barred.

(d) orders that any attempted filing of any claim after the **January 3, 2011 Absolute Final Bar Date** shall **not** be considered, no written notice of denial under R.C. 3903.39 need be issued. As such, the filer of such a claim shall not be entitled to any hearing on the claim;

Definitions

A "Blanket Proof of Claim" is a proof of claim that includes the following features: (1) the claimant did not provide specific information relating to a claim or cause of action; and (2) the claimant evidences some intent that the POC covers or asserts a claim that might occur or arise after the submission of the Blanket Proof of Claim, including a Future Claim. There is authority suggesting that the statutes do not authorize these types of claims. Even so, they are typically filed by IGAs. Claims of this nature will NOT be allowed or accepted at this point in time.

An "Unspecified Claim" is a demand or right of action, whether or not the claimant asserts that it has been reported to the Liquidator under a POC or Blanket Proof of Claim, that includes: (a) demands that are not capable of being Perfected by January 3, 2011; (b) rights of action that have accrued but the liability has not been determined or the amount thereof liquidated and the claimant has not Perfected the claim by January 3, 2011; (c) demands where the Proliance insured or Liquidator has received reports or notices, whether or not formal demands for payment were included, on the basis that a demand or claim may mature at some point; (d) demands asserted in litigation with the Proliance

insured that are reopened and reported after January 3, 2011; and/or (e) claims of minors not asserted or Perfected on or before January 3, 2011. Claims of this nature will NOT be allowed or accepted at this point in time. An "Unspecified Claim" does not include a contingent claim described under R.C. 3903.37, provided that on or before January 3, 2011 the Liquidator is provided with sufficient information under R.C. 3903.36 for the Liquidator to determine and allow the claim.

A "Future Claim" is a claim that may be filed in the future that includes one or more of the following features: (a) the claim arises after January 3, 2011; (b) the facts surrounding the claim are presently unknown to the Liquidator and/or the claimant whether or not intended to be set forth within a Blanket Proof of Claim; and (c) the claim has yet to be asserted against a Proliance insured and/or the Liquidator. Claims of this nature will NOT be allowed or accepted at this point in time.

A "Perfected Claims" is a proof of claim that is provided to the Liquidator by January 3, 2011 and contains sufficient information and documentation describing the facts of the claim, including but not limited to: (a) a detailed statement describing the claim; (b) a detailed statement describing the dollar value of the claim; (c) documents evidencing damage; and (d) all other information or documents helpful to proving the claim, all as required by R.C. 3903.36 and the instructions to the POC form. These claims are the only claims that will be accepted and adjudicated pursuant to the Order.

**All Proofs of Claim that were received prior to the April 24, 2002 Bar Date established in the Liquidation Order dated on or about April 24, 2001 (including timely filed Blanket Proofs of Claim, Contingent Claims, Future Claims and Unspecified Claims) have already been adjudicated and, if allowed, classed and paid.**

**Any Proof of Claim that is received by the Liquidator after the April 24, 2002 Bar Date and before the January 3, 2011 Absolute Final Bar Date will be classified as a Class 7 (late-filed) or below under R.C. 3903.42 and the Order.**

**In order to have a claim considered and to be eligible to share in any pro rata distribution to Classes 7, 8 or 9 from the Proliance liquidation proceeding, all Proliance claimants and creditors who have NOT already filed a proof of claim MUST file their Proofs of Claim with the Liquidator on the appropriate Proof of Claim form (enclosed) by the January 3, 2011 Absolute Final Bar Date.**

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 describing an actual claim, with appropriate attached documentation, you do not need to take any additional action to preserve your actual and existing claim.

If you have already filed a Proof of Claim for a Contingent Claim or a Future Claim but have not documented it, you **MUST submit to the Liquidator sufficient supporting information to document your claim no later than January 3, 2011, or your claim will be foreclosed and forever barred.** Claimants are required to submit all documents relating to or supporting claims covered by Proliance in writing to the Liquidator. Supporting information and documentation describing all facts of the claim, including but not limited to: (a) a detailed statement describing the claim; (b) a detailed statement describing the dollar value of the claim; (c) documents

**evidencing damage; and (d) all other information or documents helpful to proving the claim, all as required by R.C. 3903.36 and the instructions to the Proof of Claim form. Contingent and Future Claims will not participate in any pro rata distribution from Proliance liquidation proceeding to Classes 7, 8 and 9 even if an unsupported Blanket Proof of Claim is submitted on or before the January 3, 2011 Absolute Final Bar Date.**

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

**Any and all documentation regarding claims must be received on or before the January 3, 2011 Absolute Final Bar Date and should be submitted to:**

**Office of the Ohio Insurance Liquidator**

**Attn: Proliance**

**50 W. Town Street, Third Floor – Suite 350**

**Columbus, Ohio 43215**

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 will result in denial of your claim.**