

STATE OF SOUTH CAROLINA  
COUNTY OF RICHLAND  
IN THE COURT OF COMMON PLEAS

CASE NUMBER: 2014CP4005987

Raymond G Farmer  
South Carolina Dept of Insurance  
PLAINTIFF(S)

First Keystone Risk  
DEFENDANT(S)

Submitted by: \_\_\_\_\_

Attorney for :  Plaintiff  Defendant or  Self-Represented Litigant

**DISPOSITION TYPE (CHECK ONE)**

- JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.
- ACTION DISMISSED (CHECK REASON):**  Rule 12(b), SCRPC;  Rule 41(a), SCRPC (Vol. No. Suit);  
 Rule 43(k), SCRPC (Settled);  Other \_\_\_\_\_
- ACTION STRICKEN (CHECK REASON):**  Rule 40(j), SCRPC;  Bankruptcy;  
 Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award;  Other \_\_\_\_\_
- STAYED DUE TO BANKRUPTCY**
- DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):**  
 Affirmed;  Reversed;  Remanded;  Other \_\_\_\_\_

RECEIVED  
2014 DEC - 23 AM 9:51  
RICHLAND COUNTY

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

**IT IS ORDERED AND ADJUDGED:**  See attached order (formal order to follow)  Statement of Judgment by the Court:

**ORDER INFORMATION**

This order  ends  does not end the case. Additional Information for the Clerk : \_\_\_\_\_

**INFORMATION FOR THE JUDGMENT INDEX**

Complete this section below when the judgment affects title to real or personal property or if any amount should be enrolled. If there is no judgment information, indicate "N/A" in one of the boxes below.

Judgment in Favor of (List name(s) below)	Judgment Against (List name(s) below)	Judgment Amount To be Enrolled
		\$
		\$
		\$
If applicable, describe the property, including tax map information and address, referenced in the order:		

The judgment information above has been provided by the submitting party. Disputes concerning the amounts contained in this form may be addressed by way of motion pursuant to the SC Rules of Civil Procedure. Amounts to be computed such as interest or additional taxable costs not available at the time the form and final order are submitted to the judge may be provided to the clerk. **Note: Title abstractors and researchers should refer to the official court order for judgment details.**

Circuit Court Judge \_\_\_\_\_ Judge Code 2061 Date \_\_\_\_\_

**For Clerk of Court Office Use Only**

This judgment was entered on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ and a copy mailed first class or placed in the appropriate attorney's box on this 5 day of Dec, 2014 to attorneys of record or to parties (when appearing pro se) as follows:

Geoffrey Ross Bonham                      Gwendolyn Fuller McGriff                      Daniel J. Reynolds Jr.

ATTORNEY(S) FOR THE PLAINTIFF(S)  
Court Reporter \_\_\_\_\_

ATTORNEY(S) FOR THE DEFENDANT(S)  
Clerk of Court Jeanette W. McBride

STATE OF SOUTH CAROLINA

IN THE COURT OF COMMON PLEAS

COUNTY OF RICHLAND

FOR THE FIFTH JUDICIAL CIRCUIT

Raymond G. Farmer, as Director of the South Carolina Department of Insurance,

C.A. No. 2014-CP-40-5987

Petitioner,

**ORDER APPROVING THIRD CLAIMS REPORT & RECOMMENDATION TO BAR LATE CLAIMS**

vs.

First Keystone Risk Retention Group, Inc.,

Respondent.

2017 DEC 14 AM 9:14

RICHLAND COUNTY

This matter comes before the Court pursuant to the Liquidator's Third Claims Report, Recommendation & Application for Order Approving Same & Recommendation To Bar Late Claims ("the Application") filed in accordance with S.C. Code Ann. § 38-27-620 (2015).

Attached as Exhibit A to the Application is a schedule containing the names and addresses of each of these Class 2 claimants, their Proof of Claim ("POC") number and their recommended valuation amounts. Also attached to the Application is a detailed Affidavit of the Special Deputy Liquidator filed in support of the Application. It appears these recommendations are in the interests of all claimants and other creditors in this matter.

Therefore, the Application is hereby approved, with actual distributions to be determined at a later time in accordance with S.C. Code Ann. § 38-27-610 & -630 (2015).

**IT IS THEREFORE ORDERED** that pursuant to S.C. Code Ann. §§ 38-27-10 *et seq.*, the Third Claims Report and Recommendation is APPROVED.

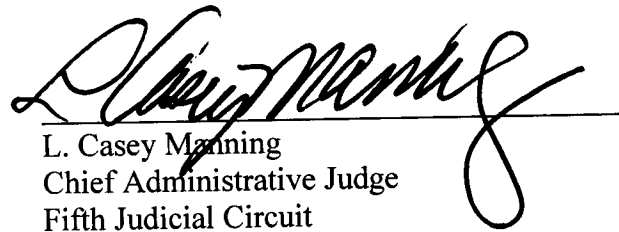
**IT IS FURTHER ORDERED** that, in order to prevent prejudice to the proceedings or the waste of assets and to ensure the orderly administration and timely closing of this liquidation estate,

any POC filed on or after the date of the submission of this Application be deemed denied and forever barred.

**IT IS FURTHER ORDERED** that if any additional factors hereafter come to the attention of the Liquidator or his Special Deputy as to the Application that may require modification to this Order, the Liquidator shall promptly file an application to modify these claims.

**AND IT IS SO ORDERED.**

December 4, 2017  
Columbia, South Carolina



L. Casey Manning  
Chief Administrative Judge  
Fifth Judicial Circuit

STATE OF SOUTH CAROLINA )

COUNTY OF RICHLAND )

Raymond G. Farmer )

Plaintiff )

v. )

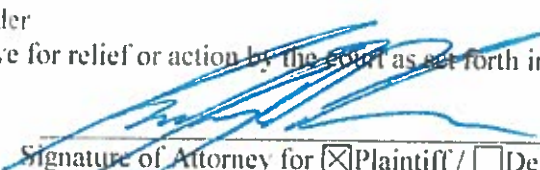
First Keystone RRG, Inc. In Liquidation )

Defendant. )

IN THE COURT OF COMMON PLEAS

CASE NO.  
2014-CP-40-5987

MOTION AND ORDER INFORMATION  
FORM AND COVER SHEET

Plaintiff's Attorney: Geoffrey R. Bonham, Bar No. 13058 Address: PO Box 100105, Columbia SC 29202-3105 phone: 803-737-6219 fax: 803-737-6229 e-mail: gbonham@doj.sc.gov other:	Defendant's Attorney: John P. Seibels, Jr., Bar No. Address: 38 Broad St #200 Charleston, SC 29401 phone: (843) 722-6777 fax: (843) 722-6781 e-mail: jseibels@seibelsfirm.com other:
<input type="checkbox"/> MOTION HEARING REQUESTED (attach written motion and complete SECTIONS I and III) <input type="checkbox"/> FORM MOTION, NO HEARING REQUESTED (complete SECTIONS II and III) <input checked="" type="checkbox"/> PROPOSED ORDER/CONSENT ORDER (complete SECTIONS II and III)	
<b>SECTION I: Hearing Information</b> Nature of Motion: Liq.'s Third Claims Report Recommendation & Application for Order et al. Estimated Time Needed: NA Court Reporter Needed: <input type="checkbox"/> YES / <input checked="" type="checkbox"/> NO	
<b>SECTION II: Motion/Order Type</b> <input checked="" type="checkbox"/> Written motion attached <input checked="" type="checkbox"/> Form Motion/Order I hereby move for relief or action by the court as set forth in the attached proposed order.  Signature of Attorney for <input checked="" type="checkbox"/> Plaintiff / <input type="checkbox"/> Defendant December 4, 2017 Date submitted	
<b>SECTION III: Motion Fee</b> <input checked="" type="checkbox"/> PAID - AMOUNT: \$25.00 <input type="checkbox"/> EXEMPT: <input type="checkbox"/> Rule to Show Cause in Child or Spousal Support (check reason) <input type="checkbox"/> Domestic Abuse or Abuse and Neglect <input type="checkbox"/> Indigent Status <input type="checkbox"/> State Agency v. Indigent Party <input type="checkbox"/> Sexually Violent Predator Act <input type="checkbox"/> Post-Conviction Relief <input type="checkbox"/> Motion for Stay in Bankruptcy <input type="checkbox"/> Motion for Publication <input type="checkbox"/> Motion for Execution (Rule 69, SCRCP) <input type="checkbox"/> Proposed order submitted at request of the court; or, reduced to writing from motion made in open court per judge's instructions Name of Court Reporter: <input type="checkbox"/> Other:	
<b>JUDGE'S SECTION</b> <input type="checkbox"/> Motion Fee to be paid upon filing of the attached order. <input type="checkbox"/> Other:	JUDGE _____ CODE: _____ Date: _____
<b>CLERK'S VERIFICATION</b> Collected by: _____ Date Filed: _____ <input type="checkbox"/> MOTION FEE COLLECTED: _____ <input type="checkbox"/> CONTESTED - AMOUNT DUE: _____	

RICHLAND COUNTY  
 FILED  
 2017 DEC -4  
 AM 10:49  
 JEANETTE W. MCBRIDE  
 C.P. & G.S.

STATE OF SOUTH CAROLINA  
COUNTY OF RICHLAND

Raymond G. Farmer, as Director of the South  
Carolina Department of Insurance,

Petitioner,

vs.

First Keystone Risk Retention Group, Inc.,

Respondent.

IN THE COURT OF COMMON PLEAS  
FOR THE FIFTH JUDICIAL CIRCUIT

C.A. No. 2014-CP-40-5987

LIQUIDATOR'S THIRD CLAIMS  
REPORT, RECOMMENDATION &  
APPLICATION FOR ORDER  
APPROVING SAME &  
RECOMMENDATION TO BAR LATE  
CLAIMS

21 DEC -4 AM 10:49  
RICHLAND COUNTY  
FILED  
J. BETTE W. MCGRIDDIE  
C.P. & G.S.

Comes now Petitioner Raymond G. Farmer, as Liquidator of the above-captioned insurance company (First Keystone), by and through the undersigned counsel, files herewith his Third Claims Report and applies to the Court for an Order approving the Liquidator's undisputed claim determinations specified herein.

This application is made pursuant to the South Carolina Insurers Rehabilitation and Liquidation Act, S.C. Code Ann. §§ 38-27-10 *et seq.*, specifically, S.C. Code Ann. § 38-27-620(a) (2015), wherein the Liquidator is required to review all claims duly filed in the liquidation proceedings, make such further investigation as he deems necessary, and submit a claims report to the Court containing his claim recommendations.

In support of his report, recommendation, and application the Liquidator would respectfully show the following:

1. Between the entry of the Order of Liquidation on October 21, 2014 and February 28, 2015, the latter being the Claims Bar Date, the Liquidator issued approximately five thousand and seven hundred (5,700) Notices of Liquidation and Proof of Claim (POC) forms, with

instructions to policyholders, third-party claimants and other potential claimants and/or creditors of First Keystone.

2. On November 3, 2014, notice of the liquidation was published in the Philadelphia Daily News, a newspaper of countywide circulation in the County of Philadelphia, informing interested parties of the liquidation proceedings and including contact information and instructions for the timely filing of a claim.

3. On or before the Bar Date of February 28, 2015, the Liquidator received one thousand six hundred and ninety-two (1,692) timely-filed POCs. The Liquidator also received one-hundred and twenty-four (124) late-filed claims, twenty-two (22) of which have now been deemed timely filed, with the remaining one-hundred and two (102) pending review.

4. Eight-hundred and thirty-one (831) claims have previously been adjudicated and submitted to the Court for approval, with such approval granted by orders entered March 24, 2017 and July 24, 2017.

5. One-hundred and thirty-one (131) more claims have now been adjudicated and are hereby submitted these claims to the Court for approval.

6. All remaining POCs received, totaling eight-hundred and fifty-four (854), remain under evaluation. Determinations, once concluded, will be forwarded to these remaining claimants via first class or certified mail.

7. Attached hereto as Exhibit A and incorporated herein is a schedule listing the names and addresses of these one-hundred and thirty-one (131) claimants holding a priority class 2 claim as defined by S.C. Code Ann. § 38-27-610(2) (2015), the POC number assigned by the Liquidator and the Liquidator's valuation recommendation for each of these class 2 claims.

8. Additionally, the Liquidator at this time proposes and recommends to the Court that

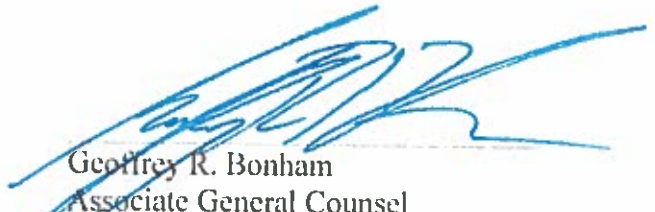
in order to prevent prejudice to the proceedings or the waste of assets and to ensure the orderly administration and timely closing of this liquidation. any POC filed on or after the date of the submission of this Application be deemed denied and forever barred.

9. In further support of this report, recommendation and application, the Liquidator has attached as Exhibit B, the affidavit of Michael J. FitzGibbons, Special Deputy Liquidator.

WHEREFORE, the Liquidator prays the Court issue an Order approving this Third Claims Report and claim recommendations, with the actual distribution to be determined at the appropriate time in accordance with S.C. Code Ann. §§ 38-27-610 & -630 (2015), as well as such other relief as the Court deems just and proper.

Respectfully submitted,

December 4, 2017



Geoffrey R. Bonham  
Associate General Counsel  
[gbonham@doi.sc.gov](mailto:gbonham@doi.sc.gov)

South Carolina Department of Insurance  
P.O. Box 100105  
Columbia, South Carolina 29202  
(803) 737-6132

One of the Attorneys for the Liquidator of  
First Keystone Risk Retention Group, Inc.,  
in Liquidation

EXHIBIT A

First Keystone RRG, Inc. in Liquidation  
 Third Claims Report  
 Class 2

POC No.	ClaimantName	Contact	Contact II	Address	City	State	Zip	Liquidator's Recommended Amount
100267	Karimah Tyler-Cush	The Magnolia Firm	Dean R. Magnolia	186 Clifton Ave	Newark	NJ	07108	2,500.00
100303	Brian Couterier	The Shields Law Firm	William G. Shields	11512 Allecingie PKY Suite C	N. Chesterfield	VA	23235	-
100387	Ricardo Purge, A minor	Solomon, Sherman & G. Ibay	David B. Sherman	8 Penn Center 1628 JFK Blvd Suite	Philadelphia	PA	19103	-
100399	Garfield Wilson	Ronner Weiner & Tran	Randi Weiner, Esq.	43 Main St. P O Box 275	Avon	NJ	07717	15,000.00
100470	Linda Smith	Handler, Henning &	Andrew Spears	1300 Lingletown Rd., Suite 2	Harrisburg	PA	17110	-
100484	Klarida Transport Incorp			2924 Joey Drive	Philadelphia	PA	19136	-
100513	Aqui Davis	Law offices of Frank J.	Bridget Saro	39 South Fullerton Ave	Montclair	NJ	07042	-
100519	Tamaree Tulatnyk	Dolchin, Slotkin & Todr						
100554	Best Service Cab Co. -	P.C.	Saude J. Ladov Esq.	50 S 16th Street Suite 3530	Philadelphia	PA	19102	6,000.00
100610	Elijah Chatman	Nelson, Fromer Crocco &	Charles M. Crocco Esq	535 Haws Ave	Norristown	PA	19401	-
100611	Audrey Reindiallo	Jordan	Charles M. Crocco Esq	P O Box 274	Neptune	NJ	07754	15,000.00
100614	Deborah Bennett	Nelson, Fromer, Crocco &	Charles M. Crocco Esq	P O Box 274	Neptune	NJ	07754	15,000.00
100623	Corvues, Inc.	Jordan		261 Wholson Road	Brodnax	VA	23920	-
100624	T.S. Malhi Cab Co.	Nelson, Fromer, Crocco &		842 Centennial Square North	Philadelphia	PA	19116	-
100631	Krzysztof Popczyk	Robinson & Grayson	Eric L. Grayson	41 S Fairview Ave	Upper Darby	PA	19082	-
100633	Alexander Philandor	Brett Tessler & Assoc.	Brett Tessler Esq	910 Faulk Road Ste 200	Wilmington	DE	09803	-
100646	Cynthia Little			2207 Chester St. 1st Fl	Philadelphia	PA	19103	-
100653	Carletta Jones	Harvey Pennington	Frederick M Walton Jr	2664 Jefferson St	Harrisburg	PA	17110	-
100686	Anthony Antonaccio			1800 John F Kennedy Blvd Ste 1300	Philadelphia	PA	19103	9,000.00
100688	KASSA WOLDE GIORGIS	Paris Blank LLP	Keith B. Marcus	2430 Tulip Street	Philadelphia	PA	19125	1,426.88
100699	Serpens, Inc.			1804 Staples Mill Rd	Henrico	VA	23230	16,000.00
100707	Mizar, Inc.			842 Centennial Square N	Philadelphia	PA	19116	-
100712	Saas Cab Co.			842 Centennial Square N	Philadelphia	PA	19116	-
100716	Saas Cab Co.			922 Thornton Rd.	Horsham	PA	19044	-
100724	Saas Cab Co.			922 Thornton Rd.	Horsham	PA	19044	-
100726	Saas Cab Co.			922 Thornton Rd.	Horsham	PA	19044	-
100732	ABC Cab Corp.			922 Thornton Rd.	Horsham	PA	19044	-
100752	123 Cab Corp.			641 North Broad Street	Philadelphia	PA	19123	-
				641 North Broad Street	Philadelphia	PA	19123	-



EXHIBIT A

First Keystone RRG, Inc. in Liquidation  
 Third Claims Report  
 Class 2

POC No.	ClaimantName	Contact	Contact II	Address	City	State	Zip	Liquidator's Recommended Amount
100779	123 Cab Corp.			641 North Broad Street	Philadelphia	PA	19123	-
100780	123 Cab Corp.			641 North Broad Street	Philadelphia	PA	19123	-
100796	Joseph R Charles	Andrew S. Maze, Esq., P.C.	Andrew S. Maze	313 Amboy Ave.	Woodbridge	NJ	07095	10,000.00
100798	Patrina Bullock	Thomas R. Yorko, P.C.	Thomas Yorko	1500 Walnut Street ; Suite 1900	Philadelphia	PA	19102	-
100806	Leroy Cooper			12400 Hunters Grove Rd	Manassas	VA	20112	-
100880	Svi Drazdouskaya	Jeffrey R. Lessin & Associates	Thomas A. Karpink	1515 Market Street Suite 714	Philadelphia	PA	19102	5,000.00
100892	Tam Cab Co			2351 S Swanson St	Philadelphia	PA	19148	950.00
100893	Malaysia Taxi			2351 S. Swanson Street	Philadelphia	PA	19148	-
100894	Brother Taxi LLC	Alperstein & Associate, LLC	David Alperstein	1515 Market Street Suite 802	Philadelphia	PA	19102	5,000.00
100895	Sri Lanka Taxi			1515 Markt Street Suite 802	Philadelphia	PA	19102	1,300.00
100910	TGIF Trans. Inc.	Alperstein & Associate, LLC	David Alperstein	2301 E. Church St.	Philadelphia	PA	19124	-
100925	123 Cab Corp			621 N. Broad St.	Philadelphia	PA	19123	-
100960	ABC Cab Corp			641 N. Broad St.	Philadelphia	PA	19123	-
100965	ABC Cab Corp			641 N. Broad St.	Philadelphia	PA	19123	-
100970	ABC Cab Corp			641 N. Broad St.	Philadelphia	PA	19123	-
100971	ABC Cab Corp			641 N. Broad St.	Philadelphia	PA	19123	-
100972	ABC Cab Corp			641 N. Broad St.	Philadelphia	PA	19123	-
100979	AF Taxi Inc			2301 Church St.	Philadelphia	PA	19124	-
100998	Lan Trans. Co Inc			2301 Church St.	Philadelphia	PA	19124	-
101015	Aaniya Transportation Inc			1276 Appalachian Rd.	Ambler	PA	19002	-
101057	Carlotta Jones	Harvey, Pennington, LTD.	Frederick M. Walton,	1800 JFK Blvd 13th Fl	Philadelphia	PA	19103	-
101063	Eid Shaker	Reid Goodwin, PLC	Casey M. Avaiil	1805 Monument Ave Suite 203	Richmond	VA	23220	-
101066	Rondell Gindraw	Saffern & Weinberg	Jeffrey D. Schaffer	815 Greenwood Ave Suite 22	Jenkintown	PA	19046	-
101070	Maleke Ware	Simon & Simon, P.C.	Marc Simon, Esq.	1515 Market Street 16th Fl	Philadelphia	PA	19102	-
101071	Alisha E. Bennett	Marks & Harrison, P.C.	Lee J. Bujakowski	P O Box 170	Hopewell	VA	23860	-
101078	Marcella McCaskill	Flynn & Associates	Frank Pollock, Esq.	2091 Springdale Road Suite 2	Cherry Hill	NJ	08003	7,500.00
101079	Ceara McCaskill	Flynn & Associates	Frank Pollock, Esq.	2091 Springdale Rd Suite 2	Cherry Hill	NJ	08003	15,000.00
101092	Fernando Arturo Perez	Simon & Simon, P.C.	Marc Simon Esq.	1515 Market Street 16th Fl	Philadelphia	PA	19102	-

EXHIBIT A

First Keystone RRG, Inc. in Liquidation  
 Third Claims Report  
 Class 2

POC No.	ClaimantName	Contact	Contact II	Address	City	State	Zip	Liquidator's Recommended Amount
101104	Ebony Harris	Spear, Greenfield &	Marc F. Greenfield,	Two Penn Center Suite 200	Philadelphia	PA	19103	-
101107	Jose Ramos-Cruz	Spear, Greenfield &	Marc F. Greenfield,	Two Penn Center Suite 200	Philadelphia	PA	19102	-
101108	Crystal Ortiz	Spear, Greenfield &	Marc F. Greenfield,	Two Penn Center Suite 200	Philadelphia	PA	19102	-
101126	Faith Callaway	Solomon, Sherman & Gabay	Eli Gabay	1628 JFK Blvd., Ste. 2200	Philadelphia	PA	19103	-
101127	Tarik Laatra			1036 Snyder Ave Apt 3	Philadelphia	PA	19148	-
101129	Harry Pavelch	Solomon Sherman & Gabay	Eli Gabay	1628 JFK Blvd	Philadelphia	PA	19103	-
101133	Shakeel Yousaf	Law office of David B.	David B. Shapiro, Esq.	1101 St. Paul St Ste 405	Baltimore	MD		-
101136	Leslie Slaughter			5595 Big Timber Court	Columbus	OH	43230	2,500.00
101142	Rachel Robbins	Swartz Culleton PC	Brandon A. Schwartz, Esq.	547 I Washington Ave	Newton	PA	18940	-
101143	Svatlana Drazdouskaya-	Jeffrey R. Lessin & Assoc, PC	Jeffrey R. Lessin	1515 Market St. Ste 714	Philadelphia	PA	19102	-
101146	Clifton Moragne	Lacovara & Burns, LLC	David W. Burns Esq.	1836 N. Black Horse Pike	Williamtown	NJ	08094	4,000.00
101174	Tamer Hebaysh	Michael Wittenberg, Esq.		26 Journal Square Suite 802	Jersey City	NJ	07306	-
101182	Brian D. Schell			1428 South Avenue Apt 2H	Plainfield	NJ	07062	-
101183	Renee L. Schell			1428 South Avenue Apt 2 H	Plainfield	NJ	07062	-
101185	Sofia Ozol			835 Chanticleer	Cherry Hill	NJ	08003	1,192.94
101188	Dorothy W. Arnold			2700 Calvert St. N/W	Washington	DC	20008	342.15
101189	Angelita Perez			3009 N 4th St.	Harrisburg	PA	17110	480.71
101194	Zein Sidi Brahim	Marks & Harrison	J. Penn Crawford	1500 Forest Ave	Richmond	VA	23229	-
101205	Samer S. Odeh	Allen, Allen & Allin	Jason W Konvicka	1809 Staples Mill Rd P O Box 6855	Richmond	VA	23230	-
101207	James Martynick	Rodden & Rodden	Patrick J. Rodden	125 N. 20th St	Philadelphia	PA	19103	-
101209	Mohammad Jaffaran	Law office of Abu Kalokh, Esq		4810 Beauregard st Suite 310	Alexandria	VA	22312	25,000.00
101210	Isaac Asante-Mensah	Eric S. Slatkin & Assoc		3905 National Drive Suite 300	Burtonsville	MD	20866	-
101215	Gladys Fortune	Dashevsky, Horowitz, Kuhn	Jeffrey S. Short, Esq.	1315 Walnut St 12th Fl	Philadelphia	PA	19107	9,000.00
101217	Toeum Vom	Wilson & Johnson	Val Pleet Wilson, Esq.	1 South Broad St Suite 1830	Philadelphia	PA	19107	10,000.00
101219	Laura Gerken	Silvers, Langsam &	Dean Weitzman	1500 JFK Blvd Suite 1410	Philadelphia	PA	19102	-
101220	Anousse Casimir	Joel I. Bergman		80 Main St Suite 150	West Orange	NJ	07052	5,000.00
101222	Robert W. Reder	Handler Henning & Rosenberg	W. Scott Henning, Esq.	1300 Lingiestown Rd Suite 2	Harrisburg	PA	17110	-
101226	Bennae Pickett	Robert Land Esquire PC		The Curtis Center 601 Walnut Street	Philadelphia	PA	19106	13,000.00
101236	Karim Saeed	Tobin, Kessler Esq.	Scott P. Kessler, Esq.	160 West 136 Central Ave	Clark	NJ	07066	-

**EXHIBIT A**

First Keystone RRG, Inc. in Liquidation  
 Third Claims Report  
 Class 2

POC No.	ClaimantName	Contact	Contact II	Address	City	State	Zip	Liquidator's Recommended Amount
101246	Aja Boyd-Miller	Cuthbert Law Firm	Richard M. Cuthbert	220 N. Sycamore St.	Petersburg	VA	23803	-
101254	Mhamed O. Mhamed	J. Penn Crawford	Marks & Harrison	1500 Forest Ave	Richmond	VA	23229	-
101262	Vincent J. Grasso			185 Bishop Drive	Aston	PA	19014	1,067.61
101271	Beverly S. Davis	Larry W. Lockwood Jr., Esq.	Hunter Law Firm	910 W. Mercury Blvd Suite 2-A	Hampton	VA	23666	-
101272	Antoine Stephenson	Larry W. Lockwood, Jr., Esq.	Hunter Law Firm	910 W. Mercury Blvd. 2-A	Hampton	VA	23666	-
101282	Gregory Cole & Gladys Cole	Law office of David J. Ales		740 Lloyd Road	Aberdeen	NJ	07747	389,000.00
101290	Esayas Demissew			1830 Metzgerott Road Apt 112	Adelphi	MD	20783	742.72
101302	Navid, Inc.			P.O. Box 383	Ambler	PA	19002	-
101304	Navid, Inc.			P.O. Box 383	Ambler	PA	19002	-
101310	Andrea Dinkins	Schuster & Assoc	Brian Maggio, Esq.	334 W. Front St	Media	PA	19063	10,000.00
101454	Heather Farrell	Solnick & Levin	Jay L. Solnick, Esq	261 Old York Rd. Suite 718	Jenkintown	PA	19046	-
101512	City Car Transport, Inc.			6930 Norwich Drive	Philadelphia	PA	19153	-
101515	City Car Transport, Inc.			6930 Norwich Drive	Philadelphia	PA	19153	-
101518	City Car Transport, Inc.			6930 Norwich Dr.	Philadelphia	PA	19153	-
101522	Pars Transport, Inc.			6930 Norwich Drive	Philadelphia	PA	19153	-
101532	H.A.T. Cab Company			6930 Norwich Drive	Philadelphia	PA	19153	-
101535	Shantae Parham	Lassiter & Assoc, PC	Duane L. Lassiter, Esq.	2000 Market St Suite 1430	Philadelphia	PA	19103	10,000.00
101552	United Cab, LLC	Justine Pate		620 S. 13th St	Harrisburg	PA	17104	-
101557	E Z Taxi, LLC	Justine Pate		620 S. 13th St	Harrisburg	PA	17104	-
101559	E Z Taxi, LLC	Justine Pate		620 S. 13TH ST	Harrisburg	PA	17104	-
101574	Keystone Cab Service, Inc.	Justine Pate		620 S. 13th St	Harrisburg	PA	17104	-
101588	J.K.P. Transport, Inc.			31 Evergreen Ave	Broomall	PA	19008	-
101595	J R K Cab Co., Inc.			11984 Dumont Rd	Philadelphia	PA	19116	-
101597	J R K Cab Co., Inc.			11984 Dumont Rd	Philadelphia	PA	19116	-
101664	Shawn Limo, Inc.			1415 June Lane	Penn Valley	PA	19072	-
101688	High Class Limo, LLC			4634 front Street	Philadelphia	PA	19140	-
101715	High Class Limo, LLC			4634 front Street	Philadelphia	PA	19140	-
101766	High Class Limo, LLC			4634 Front Street	Philadelphia	PA	19140	-
101772	High Class Limo, LLC			4634 Front Street	Philadelphia	PA	19140	-
101774	High Class Limo, LLC			4634 Front Street	Philadelphia	PA	19140	-

**EXHIBIT A**

First Keystone RRG, Inc. in Liquidation  
 Third Claims Report  
 Class 2

POC No.	ClaimantName	Contact	Contact II	Address	City	State	Zip	Liquidator's Recommended Amount
101783	El Condor Limo, Inc.			4754 Rising Sun Avenue	Philadelphia	PA	19120	-
101799	El Condor Limo, Inc.			4754 Rising Sun Avenue	Philadelphia	PA	19120	-
101802	El Condor Limo, Inc.			4754 Rising Sun Avenue	Philadelphia	PA	19120	-
101810	El condor Limo, Inc.			4754 Rising Sun Avenue	Philadelphia	PA	19120	-
101812	El Condor Limo, Inc.			4754 Rising Sun Avenue	Philadelphia	PA	19120	-
101814	El Condor Limo, Inc.			4754 Rising Sun Avenue	Philadelphia	PA	19120	-
101872	Yong Sook Lee			4754 Rising Sun Avenue	Philadelphia	PA	19120	-
101873	Charles Hopkins, Jr.	Andrew Park Law Offices	Andrew Park, Esq.	450 7th Avenue Suite 1805	New York	NY	10123	-
101884	Jean Edouard	Garnick & Toll	Robert J. Garnick	119 N. Luzerne Avenue	Baltimore	MD	21224	-
101895	Robert Hugues, JR.	Marshall E. Cresman, E. Q.		1500 Walnut Street Suite 630	Philadelphia	PA	19102	-
101897	Ryder McCarron	Marshall E. Kresman, E. Q.		1950 Street Road Suite 103	Bensalem	PA	19020	-
101906	Nicole Ray			1950 Street Road Suite 103	Bensalem	PA	19020	-
101916	Tiffany McTigue	Haggerty & Silverman	Joseph Monaco, Esq	3504 W. Allegheny Ave.	Philadelphia	PA	19132	-
101920	Adminstrator of the Estate	Gary Stewart Seffin		240 N. Duke Street	Lancaster	PA	17602	-
101926	Paul F. Geraci, III	Gelinas Law Offices	Robert A Gelinas, Esq	30 West 3rd Street	Media	PA	19063	20,000.00
				22 South 18th Street	Philadelphia	PA	19103	-
101954	Mohamed Abdelrahman	The Burger Law Firm	Rachael Hammer	148 Chain Bridge Road, Ste. 103	McLean	VA	22101	-
							<b>Total</b>	<b>626,003.01</b>

Exhibit B

STATE OF SOUTH CAROLINA

COUNTY OF RICHLAND

Raymond G. Farmer, as Director of the South Carolina Department of Insurance.

Petitioner.

vs.

First Keystone Risk Retention Group, Inc.,

Respondent.

IN THE COURT OF COMMON PLEAS  
FOR THE FIFTH JUDICIAL CIRCUIT

C.A. No. 2014-CP-40-5987

AFFIDAVIT OF MICHAEL J. FITZGIBBONS IN SUPPORT OF LIQUIDATOR'S THIRD CLAIMS REPORT, RECOMMENDATION & APPLICATION FOR ORDER APPROVING SAME AND RECOMMENDATION TO BAR LATE CLAIMS

RICHLAND COUNTY  
FILED  
2017 DEC -4 AM 10:49  
ANNETTE W. MCBRIDE  
C.P. & G.S.

Michael J. FitzGibbons, being first duly sworn, deposes and says as follows:

1. I am the Special Deputy Liquidator of First Keystone Risk Retention Group, Inc. ("First Keystone"). I was appointed to my position by the Liquidator, Raymond G. Farmer, Director of the South Carolina Department of Insurance.

2. I am over 21 years of age and suffer no legal disability.

3. By virtue of my appointment as Special Deputy Liquidator, I have been actively and personally involved in the liquidation of First Keystone at all times since it was placed into liquidation, including the matters addressed in this Affidavit. My responsibilities as the Special Deputy Liquidator include supervision and oversight of and direct involvement in the liquidation process. I am familiar with the claims process and with the claims that have been filed. Therefore, I have personal knowledge of the matters addressed in this Affidavit.

4. The claims process has included the following components, each and every one of which has been followed:

- a. Notice of First Keystone's liquidation was given in accordance with S.C. Code Ann. § 38-27-410(a) (2015).

- b. In accordance with S.C. Code Ann. § 38-27-410(b) (2015), the notice specified that the last date to file a timely proof of claim with the Liquidator was February 28, 2015. Timely proofs of claim must be postmarked no later than 5:00 P.M. Mountain Standard Time, on such date.
- c. The Liquidator's Proof of Claim (POC) forms are in compliance with S.C. Code Ann. § 38-27-550(a) (2015) and provided notice thereof in accordance with S.C. Code Ann. § 38-27-410(b) (2015).
- d. As the duly-appointed Special Deputy Liquidator, I have considered each of the one-hundred and thirty-one (131) POC's subject to this Claims Report, in accordance with the requirements of the South Carolina Insurers Rehabilitation and Liquidation Act.
- e. I am administering the POC process. I contracted with Glynloen Consulting to assist me in the adjudication of claims under policies for losses incurred. I have charged Glynloen with the responsibility to make recommendations to the Liquidator as to the validity, valuation and priority of each POC. The Liquidator, and/or his duly appointed Special Deputy, then independently approves or denies Glynloen's recommendations in whole or in part and submits the same to this Court for approval.
- f. Each and every POC subject to this Claims Report contains the necessary claim file documentation for the Liquidator's recommendation thereon.
- g. To the extent this Claims Report includes claims that were denied in whole or in part, notice of such denial complying with S.C. Code Ann. § 38-27-580(a) (2015) was provided to the affected claimants and either no timely objection was made by

the affected claimants or the objection was resolved by mutual agreement.

5. I am submitting this Affidavit in support of Liquidator's Third Claims Report, Recommendation & Application for Order Approving Same & Recommendation To Bar Late Claims ("Report, Recommendation and Application"), which pertains to one-hundred and thirty-one (131) claims in priority class 2, as prescribed by S.C. Code Ann. §§ 38-27-610 & -620 (2015).

6. Between the entry of the Liquidation Order on October 21, 2014 and February 28, 2015, I caused to be issued approximately five thousand and seven hundred (5,700) Notices of Liquidation and Proof of Claim (POC) forms, together with instructions to policyholders, third-party claimants, and/or other potential claimants and creditors of First Keystone.

7. On November 3, 2014, I caused to be published Notice of the liquidation in the Philadelphia Daily News, a newspaper of countywide circulation in the County of Philadelphia, informing interested parties of the liquidation proceedings and including contact information and instructions for the timely filing of a claim.

8. On or before the Bar Date of February 28, 2015, I received one thousand six hundred and ninety-two (1,692) timely filed POC's, and one-hundred and twenty-four (124) late-filed claims. Twenty-two (22) of the one-hundred and twenty-four (124) late-filed claims have now been considered timely filed, with one-hundred and two (102) pending further review.

9. Eight-hundred and thirty-one (831) claims have been previously adjudicated and approved by this Court in accordance with Orders dated March 24, 2017 and July 24, 2017. One-hundred and thirty-one (131) additional claims have now been adjudicated and are now the subject of this application. All remaining unadjudicated POCs are under evaluation.

10. Attached to this Application and incorporated by reference is Exhibit A which is the listing of the names and addresses of the one-hundred and thirty-one (131) claimants subject

to this application with a priority class 2 claim as defined in S.C. Code Ann. § 38-27-610(2) (2015), the number assigned to each of these Proof of Claims submitted and the claim valuation recommended and now proposed as the Liquidator's recommendation pursuant to S.C. Code Ann. § 38-27-620 (2015).

11. Actual distributions will be determined and made at the appropriate time in accordance with S.C. Code Ann. §§ 38-27-610 & -630 (2015).

12. I also recommend that, in order to prevent prejudice to the proceedings and the waste of assets and to ensure the orderly administration and timely closing of this liquidation that any POC filed on or after the date of the submission of this Application be deemed denied and forever barred.

13. To the best of my knowledge and belief, the claims subject to this Report and Application are not subject to modification. If any additional factors hereafter come to my attention which may require any modification, such as third-party payments or releases of any such claims, I will immediately notify the Liquidator, and he and or I will promptly bring those matters to the attention of this Court in an application to modify such claims.

FURTHER AFFIANT SAYETH NOT.



Michael J. FitzGibbons  
Special Deputy Liquidator

SWORN to before me this 29<sup>th</sup> day of Nov., 2017

Sarah E. Alexander  
Notary Public for the State of Arizona  
My commission expires 9/15/18



SARAH E ALEXANDER  
Notary Public - Arizona  
Maricopa County  
Expires 09/15/2018



STATE OF SOUTH CAROLINA  
COUNTY OF RICHLAND

IN THE COURT OF COMMON PLEAS  
FOR THE FIFTH JUDICIAL CIRCUIT

Raymond G. Farmer, as Director of the South  
Carolina Department of Insurance,

C.A. No. 2014-CP-40-5987

Petitioner,

**ORDER APPROVING THIRD CLAIMS  
REPORT & RECOMMENDATION TO  
BAR LATE CLAIMS**

vs.

First Keystone Risk Retention Group, Inc.,

Respondent.

This matter comes before the Court pursuant to the Liquidator's Third Claims Report, Recommendation & Application for Order Approving Same & Recommendation To Bar Late Claims ("the Application") filed in accordance with S.C. Code Ann. § 38-27-620 (2015).

Attached as Exhibit A to the Application is a Schedule containing the names and addresses of each of these Class 2 claimants, their Proof of Claim ("POC") number and their recommended valuation amounts. Also attached to the Application is a detailed Affidavit of the Special Deputy Liquidator filed in support of the Application. It appears these recommendations are in the interests of all claimants and other creditors in this matter.

Therefore, the Application is hereby approved, with actual distributions to be determined at a later time in accordance with S.C. Code Ann. § 38-27-610 & -630 (2015).

**IT IS THEREFORE ORDERED** that pursuant to S.C. Code Ann. §§ 38-27-10 *et seq.*, the Third Claims Report and Recommendation is APPROVED.

**IT IS FURTHER ORDERED** that, in order to prevent prejudice to the proceedings or the waste of assets and to ensure the orderly administration and timely closing of this liquidation estate,

any POC filed on or after the date of the submission of this Application be deemed denied and forever barred.

**IT IS FURTHER ORDERED** that if any additional factors hereafter come to the attention of the Liquidator or his Special Deputy as to the Application that may require modification to this Order, the Liquidator shall promptly file an application to modify these claims.

**AND IT IS SO ORDERED.**

December \_\_\_\_, 2017  
Columbia, South Carolina

\_\_\_\_\_  
L. Casey Manning  
Chief Administrative Judge  
11th Judicial Circuit

COPY

CERTIFICATE OF SERVICE

I hereby certify that one copy each of the foregoing *Liquidator's Third Claims Report, Recommendation & Application For Order Approving Same & Recommendation To Bar Late Claims and proposed Order* has been served upon the following persons, by First Class U.S. Mail, postage prepaid, and electronic mail, this 4<sup>th</sup> day of December, 2017, addressed as follows:

John P. Seibels, Jr., Esq.  
38 Broad St #200  
Charleston, SC 29401  
[jseibels@seibelsfirm.com](mailto:jseibels@seibelsfirm.com)

Michael J. FitzGibbons  
Special Deputy Liquidator  
FitzGibbons and Company, Inc.  
9821 N. 95th Street, Suite 105  
Scottsdale, AZ 85258  
[mjf@fitzgibbonseo.com](mailto:mjf@fitzgibbonseo.com)



---

Steven DuBois