



™ **FIRST KEYSTONE RISK RETENTION GROUP, Inc. in Liquidation**

4421 Aramingo Ave., Philadelphia, PA 19124

Phone No. (215) 235-5000

Dear Sir/Madam:

Please be advised that an Order Declaring Insolvency, Commencing Liquidation Proceedings & Granting an Injunction & Automatic Stay of Proceedings (Order) was issued by the Court of Common Pleas Fifth Judicial Circuit Richard County, South Carolina on October 21, 2014 ordering the liquidation of First Keystone Risk Retention Group, Inc. (First Keystone). Raymond G. Farmer was appointed Liquidator. Enclosed is a copy of the Order.

Pursuant to the Order, all litigated and non-litigated property/casualty claim matters that you are handling for First Keystone are now stayed. It is incumbent upon you as defense counsel on litigated files you are handling to notify, by formal service, all courts and parties of the stay. If you are handling any non-litigated claims, please notify all claimants, claimant attorneys and principals of the stay. If anyone challenges the stay order, please contact our office. We will provide you the necessary guidance in the enforceability of the stay on courts outside of the State of South Carolina. Furthermore, please copy our offices with a copy of all said notifications and a brief status for each of the files you are handling on behalf of First Keystone.

Other than the work requested above in noticing the automatic stay and providing a brief status report for each of your files, please cease any further services on First Keystone files unless you are specifically instructed to do so by the Liquidator or one of his designees. While bills for services rendered prior to October 21, 2014, will be subject to review by the Liquidator as pre-liquidation creditor claims, the services requested above, performed subsequent to the entry of the Liquidator Order will be paid in the ordinary course of business provided the services were as requested by the Liquidator or his designee. Any other services require pre-approval by the Liquidator or his designee. A proof of claim process will be implemented in the near future and interested parties such as your firm will be notified.

To the extent you are handling any subrogation or other collection matters on behalf of First Keystone, it is likely that the Liquidator will want to lift the stay and proceed forward utilizing your services to collect amounts due. However, prior approval will be required before any further efforts should be undertaken. Please provide a status report containing your evaluation of the collectability on these files.

Your attention to these matters is greatly appreciated.

Very Truly Yours,

s/ Michael J. FitzGibbons
Special Deputy Liquidator