

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

JUDGMENT IN A CIVIL CASE

CASE NUMBER: 2014CP4005987

Raymond G Farmer

First Keystone Risk

South Carolina Dept of Insurance

PLAINTIFF(S)

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. Non 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 \_\_\_\_\_
- DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):**  
 Affirmed;  Reversed;  Remanded;  Other \_\_\_\_\_

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 2161 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 24 day of March, 2017 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)

\_\_\_\_\_  
ATTORNEY(S) FOR THE DEFENDANT(S)

\_\_\_\_\_  
Court Reporter

\_\_\_\_\_  
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 FIRST CLAIMS  
REPORT & RECOMMENDATION OF  
LIQUIDATOR**

vs.

First Keystone Risk Retention Group, Inc.,

Respondent.

2017 MAR 24 PM 3:04  
RICHLAND COUNTY

This matter comes before the Court pursuant to the Liquidator's First Claims Report, Recommendation & Application for Order Approving Same ("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 all claimants and recommended amounts to be paid on each claim, as well as the priority class of each claim. Also attached to the Application is a detailed Affidavit of the Special Deputy Liquidator filed in support of the Application. It is appearing that the recommendations are in the interests of all claimants and other creditors in this matter, 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 (2015).

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

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

**AND IT IS SO ORDERED.**

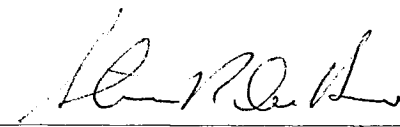
**CERTIFICATE OF SERVICE**

I hereby certify that one copy each of the foregoing *Liquidator's First Claims Report Recommendation & Application for Order Approving Same and proposed Order* has been served upon the following persons, by First Class U.S. Mail, postage prepaid, and electronic mail, this 28<sup>th</sup> day of December, 2016, 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@fitzgibbonsco.com](mailto:mjf@fitzgibbonsco.com)

2016 DEC 28 PM 4:06  
JEANETTE W. HUBBARD  
C.C.P. & G.S.  
NIGHTLAND  
FILED

  
\_\_\_\_\_  
Steven DuBois

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 FIRST CLAIMS  
REPORT, RECOMMENDATION &  
APPLICATION FOR ORDER  
APPROVING SAME**

2016 DEC 28 PM 4:06  
RICHLAND COUNTY  
FILED  
JAMES W. HODDGE  
C.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 First Claims Report, applies to the Court for an Order approving the Liquidator's undisputed claims determinations specified herein and recommends approval thereof.

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 claims 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 eleven (111) late-filed claims, eighteen (18) of which has been deemed timely filed, with the remaining ninety-three (93) pending review.

4. Ninety-nine (99) claims have now been completely adjudicated. All remaining POCs received, totaling one thousand seven hundred and four (1,704), are presently under evaluation. Determinations, once concluded, will be forwarded to remaining claimants via certified mail.

5. Attached hereto as Exhibit A and incorporated herein is a Schedule listing the names and addresses of these ninety-nine (99) 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 valuation of the claim proposed by the Liquidator.

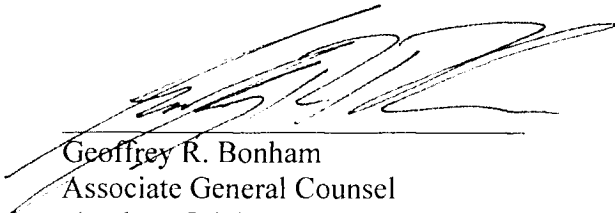
6. In further support of this report, recommendation and application, the Liquidator has attached as Exhibit B, the affidavit of Michael J. FitzGibbons, Special Deputy Liquidator.

WHEREFORE, the Liquidator prays the Court issue an Order approving this first Claims Report and claims' 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 28, 2016



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.  
First Claims Report Class 2

| POC No. | Claimant Name            | Contact                            | Contact II                               | Address   | City                         | State    | Zip            | Liquidator's Recommended Amount |
|---------|--------------------------|------------------------------------|--|---|------------------------------|----------|----------------|---------------------------------|
| 100326  | Isreal Rodriguez         | Stark & Stark, PC                  | Andrew M. Salmon, Esq.                   | 777 Township Line Rd., Suite 120                    | Yardley                      | PA       | 19067          | 130,000.00                      |
| 101256  | Donna Caihoun            | Dreskin & Dreskin, P.C.            | Michael Dreskin, Esq.                    | 744 Broad St. Suite 1813                            | Newark                       | NJ       | 07102          | 33,500.00                       |
| 100169  | Laura Leake              | Cooper Schall                      | Charles S. Cooper                        | 2000 Market St Suite 1400                           | Philadelphia                 | PA       | 19103          | 14,500.00                       |
| 100405  | Enrique Alfonso          | Mullen & Reagan                    | Brian Reagan                             | 1920 Fairfax Ave                                    | Cherry Hill                  | NJ       | 08003          | -                               |
| 100584  | Raymond Carter           | David A. DiBrigida Attorney at Law | Davis A. DiBrigida Esq                   | 101 Eisenhower Parkway                              | Roseland                     | NJ       | 07068          | -                               |
| 100801  | Loretta Sills            | McEaching & Gee, P.C               | Earl J. Gee                              | 626 South Sycamore St                               | Petersburg                   | VA       | 23803          | 11,000.00                       |
| 101058  | Sandra Harris            | Attorneys at Law                   | Paul D. Hux                              | P O Box 471   | Petersburg                   | VA       | 23804          | 12,500.00                       |
| 101275  | Gloria Langes            | Allan & Allan Law Firm             | Charles Huffman III                      | 6 South Ave East                                    | Cranford                     | NJ       | 07016          | -                               |
| 100410  | Quintella Banks          | Law office of Diana Lakić          | Anthony P. Caivano                       | 12284 Warwick Blvd # 2A                             | Newport News                 | VA       | 23606          | 3,000.00                        |
| 100323  | Geovanny Encarnacion     | Huffman & Huffman                  | Richard W. Drury Esq                     | 255 W. Main St. Suite q                             | Denville                     | NJ       | 07834          | -                               |
| 100559  | Alayna Shamy             | Anthony P. Caivano, PC             | Richard W. Drury Esq                     | 1504 E. Joppa Road                                  | Towson                       | MD       | 21286          | -                               |
| 100311  | David A. Wilkes          | McMullen & Drury, PA               |  | 3713 N. Donna wood Ct.                              | Virginia Beach               | VA       | 23452          | 79.95                           |
| 101096  | Cameron Asgharpour       | Claude M. Scialdone                |  | 1238 E. Ocean Ave.                                  | Norfolk                      | VA       | 23504          | -                               |
| 101274  | Mozell Matthews          | Law office of Diana Lakić, LLC     |  | 6 South Avenue East                                 | Cranford                     | NJ       | 07016          | -                               |
| 100529  | Robert Mercado           | Stark & Stark                      | Michael Foster Esq                       | 401 Route 73 North - Suite 700                      | Marlton                      | NJ       | 08053          | -                               |
| 101534  | H.A.T. Cab Company       |                                    |  | 6930 Norwitch Drive                                 | Philadelphia                 | PA       | 19153          | -                               |
| 101247  | Joann C. Baltuskonis     | Samuel F. Kafrissen, P.C.          | Samuel F. Kafrissen                      | 1800 JFK Blvd Suite 1402                            | Philadelphia                 | PA       | 19103          | -                               |
| 100132  | Frances Russo            | Martin & Nelson                    | Lawren J. Nelson                         | 123 S. Broad St., Ste. 1820                         | Philadelphia                 | PA       | 19109          | -                               |
| 101248  | Hector Class, Jr.        | Samuel F. Kafrissen, P.C.          |  | 1800 JFK Blvd Suite 1402                            | Philadelphia                 | PA       | 19103          | -                               |
| 100687  | Ashley McKean            | Christopher J. Brill, Esq.         | Christopher J. Brill, Esq.               | 301 S. State St. Suite N105                         | Philadelphia                 | PA       | 18940          | -                               |
| 100139  | Nancy S. Freedman        |                                    |  | 305 Princeton Ave                                   | Hamilton                     | NJ       | 08619          | -                               |
| 100288  | Paul Lawrence Frazier    | Robert J. Garnick                  | Robert J. Garnick                        | 1500 Walnut St. Suite 630                           | Philadelphia                 | PA       | 19102          | -                               |
| 100287  | Derrick Ross             | Robert J. Garnick                  | Robert J. Garnick                        | 1500 Walnut St Suite 630                            | Philadelphia                 | PA       | 19102          | -                               |
| 101099  | Jeffrey Dean             | Spear, Greenfield & Richman, PC    | Marc F. Greenfield, Esq.                 | Two Penn Center Ste 200                             | Philadelphia                 | PA       | 19102          | 42,000.00                       |
| 101549  | EK RAB, INC.             |                                    |  | 2016 Rose Lane                                      | Broomall                     | PA       | 19008          | -                               |
| 101298  | Mary Warren              | Law Office of James C. De Zao      |  | 322 US Highway 46 Suite 120                         | Parsippany                   | NJ       | 07054          | 50,000.00                       |
| 101224  | Thomas Dinan             | Wagner Newman Wigrizer             |  |   |                              |          |                |                                 |
| 101031  | Khadij Transportation    | Brecher & Miller                   | Adam S. Getson, Esq.                     | 2000 Market St. Suite 2750                          | Philadelphia                 | PA       | 19103          | -                               |
| 101225  | Latroya Singleton- Moore | Spear Greenfield & Richmon PC      |  | 1276 Appalachian Rd.                                | Ambler                       | PA       | 19002          | -                               |
| 100148  | Bernadette Redden        | Lundy Law Firm                     | Marc F. Greenfield, Esq.<br>Monica Gibbs | Two Penn Center Suite 200<br>1635 Market St 19th Fl | Philadelphia<br>Philadelphia | PA<br>PA | 19102<br>19103 | 10,000.00<br>9,000.00           |

**Exhibit A**

First Keystone RRG, Inc.  
First Claims Report Class 2

| POC No. | Claimant Name                               | Contact   | Contact II              | Address                         | City          | State | Zip   | Liquidator's Recommended Amount |
|---------|---|---|-------------------------|---------------------------------|---------------|-------|-------|---------------------------------|
| 100150  | Kearney Transport DBA: Schuyler Cargo, Inc. |   |                         | 505 Schuyler Ave                | Kearney       | NJ    | 08032 | -                               |
| 101168  | Dominick Carreon                            | Eugene S. Wishnic, Esq.   |                         | 110 Baynard St 2nd Fl           | New Brunswick | NJ    | 08901 | 30,000.00                       |
| 100512  | Eula Davis                                  | Law offices of Frank J. Zazzaro<br>Law Office of Douglas R. Stevens | Bridget Saro            | 39 South Fullerton Avenue       | Montclair     | NJ    | 07042 | 1,942.36                        |
| 100134  | Abdikarim Sharmarke                         |   | Douglas Stevens         | 3158 O St.                      | Washington    | DC    | 20007 | 2,220.17                        |
| 101170  | Ashley Perez                                | Eugene S. Wishnic, Esq.   |                         | 110 Bayard St 2nd Fl            | New Brunswick | NJ    | 08901 | 15,000.00                       |
| 101171  | Tanais Perez                                | Eugene S. Wishnic, Esq.   |                         | 110 Bayard St 2nd Fl            | New Brunswick | NJ    | 08901 | 15,000.00                       |
| 101169  | Lexa Cruz                                   | Eugene S. Wishnic, Esq.   |                         | 110 Bayard St 2nd Fl            | New Brunswick | NJ    | 08901 | 30,000.00                       |
| 100194  | Anteneh Temelisso                           | Daniel L. Sussman, Attorney   |                         | 1017 N. Calvert St.             | Baltimore     | MD    | 21202 | -                               |
| 100200  | Christopher Maluso                          | Christopher A. Zampogna, P.C.                                       | Christopher A. Zampogna | 1730 Rhode Island NW Suite 501  | Washington    | DC    | 20036 | 13,000.00                       |
| 100176  | Valerie Roberts                             | Michael A. Freedman PA  | Stephen L. Freedman     | 10019 Reisterstown Rd Ste 204   | Owing Mills   | MD    | 21117 | -                               |
| 100376  | Estate of Carl Hamilton                     | Moody & Shields<br>Wapner, Newman, Wigrizer, Brecher & Miller PC    | Adrian J. Moody         | 2958 N. 22nd St                 | Philadelphia  | PA    | 19132 | -                               |
| 100808  | Andrew Meinhardt                            |   | Robert S. Miller, Esq.  | 2000 Market Street              | Philadelphia  | PA    | 19103 | -                               |
| 100710  | Saas Cab Co.                                |   |                         | 922 Thornton Rd.                | Horsham       | PA    | 19044 | -                               |
| 100212  | Michael D'Alonzo                            | Kane & Silverman, P.C.<br>Fine, Grzech, Kelly & MacMeekin, P.A.     | Michael F. Swartz       | 2401 Pennsylvania Ave Suite 1A5 | Philadelphia  | PA    | 19130 | -                               |
| 100178  | Rajinderpal Singh                           |   | Robert W. MacMeekin     | 8501 Lasalle Rd Ste 103         | Baltimore     | MD    | 21286 | -                               |
|         | Jaime Orenge - Guardian to Brunilda Acevedo |   |                         |                                 |               |       |       |                                 |
| 100234  | Acevedo                                     | Hendricks & Hendricks   | Peter J. Hendricks      | 73 Patterson St.                | New Brunswick | NJ    | 08901 | 9,000.00                        |
| 100231  | Xiao Rong WU                                | Garnick & Associates  | Michael J. Garnick      | 1528 Walnut St. Suite 1601      | Philadelphia  | PA    | 19102 | 8,000.00                        |
| 101616  | Dashmesh Cab Corp                           |   |                         | 1198 Dumont Rd                  | Philadelphia  | PA    | 19116 | -                               |
| 100180  | Kruti Shah                                  |   |                         | 103 Warrens Ct.                 | Warrington    | PA    | 18976 | -                               |
| 101177  | Kruti Shah                                  |   |                         | 103 Warrens Court               | Warrington    | PA    | 18976 | -                               |
| 100341  | Alice Tan                                   | Colligan & Colligan   | Edward M. Colligan      | 17 Academy St. Suite 510        | Newark        | NJ    | 07102 | 38,500.00                       |
|         | Blank Moorstein & Lipshutz, LLP             |   |                         |                                 |               |       |       |                                 |
| 100245  | Efran Ramos                                 |   | Stuart Lipshutz         | 111 Rockville Pike Suite 400    | Rockville     | MD    | 20850 | -                               |
| 100238  | libreya Golder                              | Christopher Brannigan   | Christopher Brannigan   | 403 N Charles St. Suite 200     | Baltimore     | MD    | 21201 | -                               |
| 100239  | litaris Golder                              | Christopher Brannigan   | Christopher Brannigan   | 403 N. Charles St. Suite 200    | Baltimore     | MD    | 21201 | -                               |
| 100262  | Angelo Buccicci & Deborah Buccicci          | The Swain Law Firm  | Andrew D. Swain         | 2410 Bristol Rd                 | Bensalem      | PA    | 19020 | -                               |
| 100232  | Kim Green                                   | Garbar Law  | Joe Garber              | 1200 Laurel Oak Rd Suite 104    | Voorhees      | NJ    | 08043 | -                               |



**Exhibit A**

First Keystone RRG, Inc.  
First Claims Report Class 2

| POC No. | Claimant Name         | Contact                                | Contact II               | Address                          | City          | State | Zip   | Liquidator's Recommended Amount |
|---------|-----------------------|--|--------------------------|----------------------------------|---------------|-------|-------|---------------------------------|
| 100592  | Shawanda Stinnet      | Master Weinstein Schatz<br>Moyer, P.C. | Stephen E. Farber Esq    | 1818 Market Street Suite 3620    | Philadelphia  | PA    | 19103 | -                               |
| 100237  | Brenda Summerville    | Christopher Brannigan                  | Christopher Brannigan    | 403 N. Charles St. Suite 200     | Baltimore     | MD    | 21201 | -                               |
| 100407  | Rodney Green          | Garber Law Firm                        | Joel W. Garber           | 1200 Laurel Oak Rd Suite 104     | Voorhees      | NJ    | 08043 | -                               |
| 100408  | Justice Covington     | Garber Law Firm                        | Joel Garber              | 1200 Laurel Oaks Rd Ste 104      | Voorhees      | NJ    | 08043 | -                               |
| 100595  | Janile Trappier       | Simon & Simon P.C.                     | Marc Simon Esq           | 1515 Market Street 16th Fl       | Philadelphia  | PA    | 19102 | -                               |
| 101100  | Jarrell Hayward       | Spear, Greenfield, Richman,<br>PC      | Marc F. Greenfield, Esq. | Two enn Center Suite 200         | Philadelphia  | PA    | 19102 | -                               |
| 101110  | Krmerly Sass          | Spear, Greenfield & Richman,<br>PC     | Marc F. Greenfield, Esq. | Two Penn Center Suite 200        | Philadelphia  | PA    | 19102 | -                               |
| 101093  | Janile Trappier       | Simon & Simon, P.C.                    | Marc Simon, Esq.         | 1515 Market Street 16th Fl       | Philadelphia  | PA    | 19102 | -                               |
| 100805  | Valerie Farmer        | Law Offices of Glen S. Barry,<br>P.C.  | Glen S. Barry            | 1628 JFK Boulevard 8 Penn Center | Philadelphia  | PA    | 19103 | -                               |
| 100673  | Linda McAllister      | Wapner Newman Attorneys<br>at Law      | Robert S. Miller         | 2000 Market Street ; Suite 2750  | Philadelphia  | PA    | 19103 | -                               |
| 101760  | High Class Limo, LLC  |  |                          | 4634 Front Street                | Philadelphia  | PA    | 19140 | -                               |
| 101088  | Alexandria Trapp      | Spear, Greenfield & Richman<br>PC      | Marc F. Greenfield, Esq. | Two Penn Central Suite 200       | Philadelphia  | PA    | 19102 | -                               |
| 100314  | Jon Nichols           | Nadir N. Tawil                         | Nadir N. Tawil           | 10195 Main St. # 1               | Fairfax       | VA    | 22031 | 3,500.00                        |
| 100318  | Gregory Bell          | Brad Cooper Associates                 | Brad Cooper              | 1525 Locust St 13th Fl           | Philadelphia  | PA    | 19102 | 2,000.00                        |
| 100191  | Joel Soto             | Trichon, Cammisa & Axelrod,<br>P.C.    | Martin L. Trichon        | 1835 Market St Suite 2626        | Philadelphia  | PA    | 19103 | -                               |
| 101080  | Larry Bostic          | Spear, Greenfield & Richman,<br>P.C.   | Marc F. Greenfield, Esq. | Two Penn Center Suite 200        | Philadelphia  | PA    | 19102 | 34,000.00                       |
| 100472  | David Zeitler         | Law office of R. Emmett<br>Madden      | R. Emmett Madden         | 711 West Avenue                  | Jenkintown    | PA    | 19046 | -                               |
| 101767  | High Class Limo, LLC  |  |                          | 4634 Front Street                | Philadelphia  | PA    | 19140 | -                               |
| 101131  | Harun Rashid          | Solomon Sherman & Gabay                | Eli Gabay                | 1628 JFK Blvd                    | Philadelphia  | PA    | 19103 | -                               |
| 101103  | Leroy Nobles          | Spear, Greenfield & Richman,<br>PC     | Marc F. Greenfield, Esq. | Two Penn Center Suite 200        | Philadelphia  | PA    | 19102 | -                               |
| 100254  | Marlene Gino          |  |                          | 116 Front St.                    | No. Arlington | NJ    | 07031 | 325.00                          |
| 100289  | Hector Mateo          | KNAFO Law Offices                      | Frank G Procyk           | 1409 Hausman Rd                  | Allentown     | PA    | 18104 | 10,500.00                       |
| 100175  | Herman Givens         | Emroch & Kilduff, LLP                  | Chris Spinelli           | P O Box 6856                     | Richmond      | VA    | 23230 | -                               |
| 100257  | Meskelu Bika Denbissa |  |                          | 2008 Oglethorpe St # 204         | Hyattsville   | MD    | 20782 | -                               |
| 100270  | Elijah Yates          | Brownstein Pearlman                    | Todd A. Newman           | 3 N. 2nd St                      | Philadelphia  | PA    | 19106 | -                               |
| 100275  | Derrick Trawick       | Brownstein & Pearlman                  | Todd A. Newman           | 3 N. 2nd St.                     | Philadelphia  | PA    | 19106 | -                               |
| 100374  | Joylynn Givens        | Emroch & Kilduff, LLP                  | Chris Spinelli           | P O Box 6856                     | Richmond      | VA    | 23230 | -                               |
| 100926  | 123 Cab Corp          |  |                          | 641 N. Broad St.                 | Philadelphia  | PA    | 19123 | -                               |
| 100269  | Morris L. Peterson    | Brownstein & Pearlman                  | Michael E. Cook          | 3 N 2nd St                       | Philadelphia  | PA    | 19106 | -                               |

**Exhibit A**

First Keystone RRG, Inc.  
First Claims Report Class 2

| POC No. | Claimant Name             | Contact                          | Contact II               | Address                    | City           | State | Zip          | Liquidator's Recommended Amount |
|---------|---------------------------|----------------------------------|--------------------------|----------------------------|----------------|-------|--------------|---------------------------------|
| 101084  | Willie Devlin             | Spear Greenfield & Richman, P.C. | Marc F. Greenfield, Esq. | Two Penn Center Ste 200    | Philadelphia   | PA    | 19102        | 2,500.00                        |
| 101763  | High Class Limo, LLC      |                                  |                          | 4634 Front Street          | Philadelphia   | PA    | 19140        | -                               |
| 101585  | Gagan Cab, Inc.           |                                  |                          | 7262 Spruce St             | Upper Darby    | PA    | 19082        | -                               |
| 100327  | Michael M. Miller         | Tavss Fletcher                   | Richard Tavss            | 555 Main St. 14th Fl       | Norfolk        | VA    | 23510        | -                               |
| 100370  | Valerie Martin            | Donald Werner                    | Donald Werner            | 744 Broad St. Suite 522    | Newark         | NJ    | 07102        | -                               |
| 100371  | Theresa Martin            | Donald Werner                    | Donald Werner            | 744 Broad St Suite 522     | Newark         | NJ    | 07102        | -                               |
| 100388  | Godson Saint Croix        | Joel K. Kofsky                   | Joel K. Kofsky           | 1500 JFK Blvd Suite 1050   | Philadelphia   | PA    | 19102        | -                               |
| 101032  | Khadim Transportation Inc |                                  |                          | 1276 Appalachian Rd.       | Ambler         | PA    | 19002        | -                               |
| 101198  | Ana Payamps               | Law office of Ana C. Moreira     | Ana Moreira, Esq.        | 2310 JFK Blvd              | Jersey City NJ |       | 07304        | 65,000.00                       |
| 100639  | Annette Cudjoe            | Cuthbert Law offices             | Richard M Cuthbert       | 220 N. Sycamore St         | Petersburg     | VA    | 23803        | -                               |
| 101685  | High Class Limo, LLC-     |                                  |                          | 4634 Front Street          | Philadelphia   | PA    | 19140        | -                               |
| 101059  | Rami Ben Mohamed          |                                  |                          | 3407 Moray Lane # 607      | Falls Church   | VA    | 22041        | -                               |
| 100587  | Mokhtar Adoui             |                                  |                          | 2301 Woodward St., Apt. C1 | Philadelphia   | PA    | 19115        | -                               |
| 100297  | Cash Wright               | Dulaney, Lauer & Thomas          | Carl N. Lauer            | 1516 N. Shennandoah Ave    | Front Royal    | VA    | 22630        | 1,000.00                        |
|         | Dee Zandra Wright         |                                  |                          |                            |                |       | <b>Total</b> | <b>597,067.48</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  
FIRST CLAIMS REPORT,  
RECOMMENDATION &  
APPLICATION FOR ORDER  
APPROVING SAME**

2016 DEC 28 PM 4:06  
JEANETTE W. MOSELEY  
C.C.P. & G.S.  
RICHLAND COUNTY  
FILED

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 and every of the ninety-nine (99) POCs 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 Glynloens' recommendations in whole or in part and submit 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 First Claims Report, Recommendation & Application for Order Approving Same ("Report, Recommendation and Application"), which pertains to ninety-nine (99) 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, 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 POCs, and I received one hundred and eleven (111) late-filed claims. Eighteen (18) of the one hundred and eleven (111) late-filed claims have been considered timely filed, with ninety-three (93) pending further review.

9. Ninety-nine (99) claims have now been adjudicated and are the subject of this application. All remaining unadjudicated POCs are under evaluation.

10. Attached to the Report, Recommendation and Application and incorporated by reference as Exhibit A is a listing of the names and addresses of ninety-nine (99) claimants in this liquidation within priority class 2 as defined in S.C. Code Ann. § 38-27-610(2) (2015), the number assigned to the Proof of Claim submitted by each of these claimants and the amount of the claim finally recommended and now proposed as the Liquidator's recommendation pursuant to S.C.

Code Ann. § 38-27-620 (2015). Actual distributions will be determined and made at the appropriate time in accordance with S.C. Code Ann. §§ 38-27-610 & -630 (2015).

11. 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 20<sup>th</sup> day of Dec., 2016

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



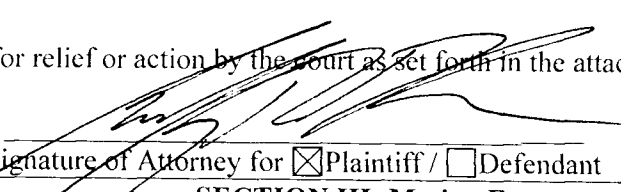
SARAH E. ALEXANDER  
Notary Public - Arizona  
Maricopa County  
Expires 09/15/2018

STATE OF SOUTH CAROLINA )  
 )  
 COUNTY OF RICHLAND )  
 )  
 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:<br>Geoffrey R. Bonham, Bar No. 13058<br>Address:<br>PO Box 100105, Columbia SC 29202-3105<br>phone: 803-737-6219 fax: 803-737-6229<br>e-mail: gbonham@doi.sc.gov other:   | Defendant's Attorney:<br>Magalie A. Creech Esq., Bar No.<br>Address:<br>4000 Faber Place Drive, Suite 450<br>North Charleston, SC 29405<br>phone: (843) 577-5460 fax: (866) 800-2848<br>e-mail: mcreech@finkellaw.com other: |
| <input type="checkbox"/> MOTION HEARING REQUESTED (attach written motion and complete SECTIONS I and III)<br><input type="checkbox"/> FORM MOTION, NO HEARING REQUESTED (complete SECTIONS II and III)<br><input checked="" type="checkbox"/> PROPOSED ORDER/CONSENT ORDER (complete SECTIONS II and III)   |  |
| <p style="text-align: center;"><b>SECTION I: Hearing Information</b></p> Nature of Motion: Liq.'s First Claims Report Recommendation & Application for Order et al.<br>Estimated Time Needed: NA Court Reporter Needed: <input type="checkbox"/> YES / <input checked="" type="checkbox"/> NO   |  |
| <p style="text-align: center;"><b>SECTION II: Motion/Order Type</b></p> <input checked="" type="checkbox"/> Written motion attached<br><input checked="" type="checkbox"/> Form Motion/Order<br>I hereby move for relief or action by the court as set forth in the attached proposed order.  |  |
| <div style="display: flex; justify-content: space-between;"> <div style="text-align: center;"> <br/>           Signature of Attorney for <input checked="" type="checkbox"/> Plaintiff / <input type="checkbox"/> Defendant         </div> <div style="text-align: right;">           December 28, 2016<br/>           Date submitted         </div> </div>   |  |
| <p style="text-align: center;"><b>SECTION III: Motion Fee</b></p> <input checked="" type="checkbox"/> PAID - AMOUNT: \$25.00<br><input type="checkbox"/> EXEMPT: <input type="checkbox"/> Rule to Show Cause in Child or Spousal Support<br>(check reason) <input type="checkbox"/> Domestic Abuse or Abuse and Neglect<br><input type="checkbox"/> Indigent Status <input type="checkbox"/> State Agency v. Indigent Party<br><input type="checkbox"/> Sexually Violent Predator Act <input type="checkbox"/> Post-Conviction Relief<br><input type="checkbox"/> Motion for Stay in Bankruptcy<br><input type="checkbox"/> Motion for Publication <input type="checkbox"/> Motion for Execution (Rule 69, SCRCF)<br><input type="checkbox"/> Proposed order submitted at request of the court; or,<br>reduced to writing from motion made in open court per judge's instructions<br>Name of Court Reporter:<br><input type="checkbox"/> Other: |  |
| <p style="text-align: center;"><b>JUDGE'S SECTION</b></p> <input type="checkbox"/> Motion Fee to be paid upon filing of the attached order.<br><input type="checkbox"/> Other:  | JUDGE: _____<br>CODE: _____ Date: _____  |
| <p style="text-align: center;"><b>CLERK'S VERIFICATION</b></p> Collected by: _____ Date Filed: _____<br><input type="checkbox"/> MOTION FEE COLLECTED: _____<br><input type="checkbox"/> CONTESTED - AMOUNT DUE: _____  |  |

JUDGE: J. M. HARRIS & G. S. BRIDGE  
 DEC 28 PM 4:05  
 FILED



# South Carolina Department of Insurance

NIKKI R. HALEY  
Governor

Office of General Counsel  
P.O. Box 100105, Columbia, S.C. 29202-3105  
Telephone: (803) 737-6219  
Facsimile: (803) 737-6229

RAYMOND G. FARMER  
Director of Insurance

December 28, 2016

## **HAND-DELIVERED**

The Hon. DeAndrea G. Benjamin  
C/O Richland County Clerk of Court  
1701 Main Street  
Columbia, SC 29202-0192

Re: *Farmer v. First Keystone RRG, Inc.*  
Case No. 2014-CP-40-05987  
Liquidator's First Claims Report, Recommendation & Application for Order  
Approving Same, with proposed Order

Dear Judge Benjamin:

Enclosed herewith for your review please find (1) a clocked-in copy of the Liquidator's Fourth Claims Report, Recommendation & Application for Order Approving Claims Determinations and Interim Distribution on Class 2 Claim ("Application") and (2) a proposed Order in the above-referenced matter.

At this time, we are only seeking approval as to the Liquidator's recommendation on these claims. Total final distributions will, of course, be made at a later date in strict accordance with S.C. Code Ann. § 38-27-610 (2015).

If after reviewing the Application and the proposed Order the Court finds the latter suitable, please sign and date it and forward it to the Clerk of Court for filing. Or, if the Court prefers, I am more than happy to pick up the signed Order and file it with the Clerk.

Thank you very much for your attention and consideration. If the Court has any questions regarding the enclosed or any other aspect of this receivership, please do not hesitate to contact me at [gbonham@doi.sc.gov](mailto:gbonham@doi.sc.gov) or 803-737-6219.