

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

In Re: Bedivere Insurance Company, :  
In Liquidation : No. 1 BIC 2021

**LIQUIDATOR’S THIRD REPORT REGARDING THE STATUS OF THE  
LIQUIDATION OF THE BEDIVERE ESTATE**

I. INTRODUCTION

Michael Humphreys, Insurance Commissioner of the Commonwealth of Pennsylvania, in his official capacity as Statutory Liquidator (the “Liquidator”) of Bedivere Insurance Company (“Bedivere”), through his undersigned counsel, hereby submits this report on the status of the liquidation of Bedivere as of December 31, 2024.

II. REPORT

A. BACKGROUND

Bedivere has a lengthy and complex corporate history within the United States that includes over 75 different policy issuing carrier names via mergers and name changes over the past 180 years. This includes the former Commercial Union, General Accident and One Beacon Insurance companies among others. When these companies were actively writing business, they issued both primary and excess liability insurance policies to many of the largest manufacturing and industrial corporations in the world. For many insureds, Bedivere's predecessors renewed policies over extended periods of time. In addition, Bedivere's predecessors also provided both treaty and facultative reinsurance to large national insurance companies, who in turn wrote direct portfolios of business that were similar to the direct business of Bedivere's predecessors. As a consequence, the remaining liabilities include substantial asbestos, pollution, and other toxic tort claims. It also includes talc, molestation, PFAS<sup>1</sup>, and other emerging liabilities that impact policies issued decades ago. There is also a significant amount of open workers compensation claims.

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<sup>1</sup> PFAS (Per- and polyfluorinated alkyl substances) Chemicals, also known as the Forever Chemicals, are a class of chemicals used to make products grease proof, water-proof, stick-proof, and stain-resistant.

## B. ESTATE ADMINISTRATION

Given the complexity, scale, scope, and challenges that the Bedivere liquidation presents, the Liquidator has engaged several service providers to help manage and administer the liquidation process.

As of the date of the liquidation order, Bedivere had no employees and was managed by A. G. Risk Management, Inc (“AGRM”) (formerly known as Armour Risk Management, Inc), an unaffiliated service provider. Today, AGRM is a subsidiary of Alan Gray, LLC. This organization includes many employees who have worked on the Bedivere portfolio since the 1980s and 90s. Understanding the expense efficiencies that accrue from engaging a firm with significant institutional knowledge of the portfolio, the Liquidator retained AGRM to help administer the liquidation.

In addition to AGRM, the Liquidator has engaged independent contractors with extensive insurance company liquidation management experience to provide guidance, support and oversight of AGRM as well as to directly handle various Bedivere matters. Finally, the Liquidator’s staff in the Pennsylvania Insurance Department’s Office of Liquidations, Rehabilitations and Special Funds provides additional advice and oversight

of the Bedivere estate and the independent contractors and service providers engaged in administering and managing the liquidation.

### C. LITIGATION AND LEGAL MATTERS

Through 4 years, the Bedivere estate has had a remarkably quiet docket especially considering the size, scope, and type of insureds and liabilities involved with the estate. As of 12/31/2024, only 4 objections to Notices of Determinations (“NODs”) have been filed, and all were withdrawn by the claimants without change to the NODs after discussion with the Liquidator’s staff. It is reasonable to expect that the Bedivere estate may experience increased docket activity as it issues additional NODs on complex claims, or if reinsurers engage in vexatious conduct as additional reinsurance billings are issued.

With that said, the Liquidator inherited a number of pending actions wherein Bedivere was a party. These matters involved both state and federal jurisdictions throughout the United States. In all cases except two (now resolved), the Liquidator requested that stays be entered in recognition of this Court’s liquidation order. Subsequently, the Liquidator has pursued dismissals in favor of the POC process. At present, there are 24 cases that are stayed or inactive as to Bedivere, or as to which Bedivere is in the

process of obtaining a dismissal. The Liquidator expects to continue to obtain or file for dismissals of those cases in the future as necessary and appropriate.

There is one matter that commenced during the pendency of the liquidation. On March 10, 2023, the Liquidator filed an action in Commonwealth Court seeking recovery of approximately \$3 million that the Liquidator asserts was a preferential payment made by Bedivere prior to liquidation. This matter is currently pending.

#### D. FINANCIAL MATTERS

Bedivere has prepared the Special Purpose Statement of Assets and Liabilities, Statutory Policyholders Surplus Account and Cash Flow and Investment Summary (“Statements”). The Statements include many estimates as noted below and may not fully reflect the effects of the liquidation. Consequently, the ultimate distribution to creditors is unknown at this time. For this reason, third parties should not rely on the financial information contained herein as providing any certainty or clear indication as to the ultimate distribution that will be made from Bedivere.

##### 1. Assets and Liabilities

Exhibit A displays a Special Purpose Statement of Assets and Liabilities. Total Assets are estimated at \$1.05 billion. Total Liabilities are estimated at \$3.46 billion. The Notes to the Special Purpose Statement of Assets and Liabilities (Exhibit D) describes the nature of the line items on the Statements and should be included in any review of Bedivere's financial information. It is important to note that the Special Purpose Statement of Assets and Liabilities is not intended to be in conformity with, and may vary significantly from, Generally Accepted Accounting Principles (GAAP) and Statutory Accounting Practices (SAP) for a property and casualty insurance company as prescribed by the National Association of Insurance Commissioners (NAIC).

The most significant Assets are Cash and Investments, which is discussed below, and Reinsurance, which is discussed in a separate section.

The most significant Liabilities are Priority Class (b) Loss and Allocated Loss Adjustment Expense ("ALAE") liabilities, which are estimated at \$1.817 billion. This figure is inclusive of Guaranty Association ("GA") claims paid and reserved as reported, reserves on claims or portions of claims not covered by GAs, and Incurred But Not Reported Loss and ALAE ("IBNR"). Notwithstanding its label, IBNR also includes an estimate for additional development on known claims. Due to the inherent complexity

of the loss reserving process, the potential variability of the assumptions used and the variability resulting from the effect of the liquidation process, the final ultimate liability for losses and loss adjustment expenses will be determined through the NOD evaluation process and may be significantly different from the estimate of loss and ALAE reserves included in the statements.

In February 2025, Bedivere's actuary completed an updated post-liquidation actuarial review of estimated direct and assumed losses and ALAE exposures, both known and unknown, as well as related future exposures. Estimates were based on information as of November 30, 2024, including GA claim data, POC data, individual insured large loss evaluations by senior claims personnel, pre-liquidation historical data and industry data modified for current trends, as well as prevailing economic conditions. This actuarial estimate is reflected in the Statement of Assets and Liabilities as of December 31, 2024. This estimate represents one possible value in a range of acceptable estimates. Actual results will differ from this estimate, and perhaps significantly. For example, no consideration has been included in the current loss estimate for the possibility of additional states, such as Pennsylvania, re-opening their statute of limitations to allow for victims of sexual abuse and molestation from decades past to bring claims otherwise

foreclosed by existing statutes. Other emerging liabilities allocable to old liability policies may also have the potential to change the loss and ALAE estimates. Consequently, there is uncertainty surrounding the loss and ALAE estimate.

2. Policyholders Surplus

Exhibit B is a special purpose Statement of Policyholders Surplus for the period from January 1, 2023 to December 31, 2024. The estimated net deficit at December 31, 2024 was \$2.407 billion.

3. Cash Flow & Investments

Exhibit C displays the changes in Cash and Investments for the period 1/1/2024 to 12/31/2024. During 2024, Cash and Investments increased from \$287.3 million to \$310.7 million as of December 31, 2024. The paid expenses include amounts incurred and accrued in the prior year but paid during 2024. Included in Cash and Investments are \$10.6 million held for the benefit of secured creditors, \$7.7 million of special state deposits, and \$38.4 million of deposits transferred to state guaranty associations. The remaining cash and invested assets total \$254 million.

As of 12/31/2024, the investment portfolio includes 29% Treasury bills and bonds, 28% agency bonds, and 35% investment grade corporate bonds. The Liquidator has an investment committee that oversees



Bedivere's investment manager and monitors adherence to the investment guidelines established for Bedivere's portfolio. Our 2024 net investment gain was \$11.2 million, which is a gain of 4.74% net of fees. This return was significantly higher than the comparative benchmark index of 2.47% for comparable portfolios. The average duration of the overall portfolio as of 12/31/2024 is 2.28 years, but the average duration of the corporate bonds in the portfolio is only 1.2 years. The short duration affords the opportunity to hold bonds to maturity and eliminate any unrecognized loss in the portfolio.

Exhibit E displays a list of securities owned and their valuation as of December 31, 2024.

4. Expenses

a. Operating Expenses

The operating expenses of Bedivere relate to efforts by the Liquidator to marshal and maximize the assets of the estate for the benefit of all Bedivere creditors, as well as review and determine the ultimate liabilities of the estate, and to fulfill the public policies and purposes of the insurance company liquidation process.

The operating expenses total \$13.9 million exclusive of GA expenses for the period from January 1, 2024 through December 31, 2024. This amount is an increase of exactly 1% over the prior year. Exhibit F displays

the expenses incurred by the estate from January 1, 2024 through December 31, 2024 by major expense category. This includes expenses accrued but not yet paid. As explained under the Estate Administration section of this report, Bedivere has no employees and no office space of its own. Rather, Bedivere retains AGRM to perform most of the day-to-day operational functions. Therefore, instead of Bedivere direct expense line items for salary, benefits, rent, computer hardware and software, and other office expenses, the Bedivere estate has a single line-item expense in the form of the AGRM service fee. Nevertheless, the Liquidator receives and reviews detailed information of AGRM's costs that underlay AGRM fees.

Other operating expenses include legal fees and expenses, professional services, record storage costs, and GA expenses.

b. Legal Fees and Expenses

Legal fees and expenses are \$441,862 from January 1, 2024 through December 31, 2024. Exhibit G displays the legal expense detail by firm for that period. In addition to law firms, the schedule includes arbitrators and a document management firm. The legal expenses of the Bedivere estate can be divided into two general categories: (1) estate administration and (2) general asset recovery.

Issues arising from the administration of the Estate involve such matters as (1) stays of litigation; (2) various claim issues; (3) issues arising with the GAs; and (4) reinsurance set-off issues.

As aforementioned, there is an action seeking recovery of approximately \$3 million that the Liquidator asserts was a preferential payment made by Bedivere prior to liquidation.

c. Professional Service Expenses

Professional Service fees and expenses are \$13.3 million from January 1, 2024 through December 31, 2024. Exhibit H displays the professional service expense detail by vendor name from January 1, 2024 through December 31, 2024. The individual professionals and firms listed includes AGRM, who represents 84% of the fees in this category. The schedule also includes professional services provided to Bedivere by the Pennsylvania Insurance Department, either directly by the professional staff of the Office of Liquidations, Rehabilitations and Special Funds, or through specialized consultants hired to assist the Liquidator in administering the liquidation of Bedivere. It also includes record storage services provided by Iron Mountain.

d. 2025 Operating Expense Budget

Exhibit I displays the operating expense budget developed for the 2025 calendar year. The overall budget of \$16.3 million reflects a \$2.4 million or 17.4% increase over 2024 actual expenses. Over 90% of the budget increase is attributable to the increased usage and time of outside counsel, the Liquidator's consultants, and AGRM staff as the Bedivere team concentrates on evaluating the most complex Proofs of Claim in the estate. The legal expense portion of the budget is the most significant component of the increase, comprising over \$1 million of the increase over 2024 actual expense. While it is inherently difficult to forecast legal expenses, Bedivere anticipates a significant increase in utilizing outside counsel services for coverage opinions as well as retaining counsel for anticipated objections to NODs issued.

e. Guaranty Association Expenses

Certain expenses of GAs paid and incurred in handling the claims of Bedivere policyholders and creditors, pursuant to 40 P.S. §221.44(a), are administrative expenses of the estate. Bedivere receives regular quarterly reports from most GAs. The total GA administrative expenses reported by the GAs from inception of the liquidation through December 31, 2024 was \$26.8 million. Exhibit J displays administrative expenses as reported by

each GA that has filed a POC in the Bedivere estate as of December 31, 2024.

#### E. GUARANTY ASSOCIATIONS

The state insurance guaranty associations are an essential part of the liquidation safety net, providing significant coverage to certain policyholders and paying covered claims as defined and required by their respective statutes.

On an on-going basis, the GAs electronically report their paid loss and reserve activity to the Liquidator utilizing the NAIC Uniform Data Standards (“UDS”). In addition, some GAs avail themselves of the UDS electronic document transmission process wherein the Liquidator receives current imaged file information in addition to the data. Receiving the imaged records is important to successful liquidation management as such records (1) enhance reinsurance reporting and recovery efforts, (2) simplify closed file return from the GAs, and (3) support evaluation of a GA’s omnibus Proof of Claim.

Through 12/31/2024, the GAs have reported \$69.6 million in paid loss and allocated loss adjustment expense, and \$233.1 million of reserves for loss and allocated loss adjustment expense. Therefore, in total through the

end of liquidation, the GAs expect to pay out approximately \$302.7 million in loss and allocated loss expense. Exhibit J lists the amounts by GA. It is important to note that during the period of file transition, the Liquidator provided continuity of claim payments for Workers Compensation indemnity claim payment recipients and Personal Injury Protection claim payment recipients. These amounts totaled \$1.8 million and are considered early access payments to the impacted GAs in conformity with the Liquidation Order.

In addition, the National Conference of Insurance Guaranty Funds (NCIGF) established a Bedivere Liaison Committee to meet with the Liquidator's staff on a periodic basis. This committee includes representatives of a handful of GAs and key personnel of the Liquidator's staff. This group discusses both operational and liquidation matters of interest from both a GA and Liquidator perspective. The NCIGF, the GAs, and Bedivere have established a good working relationship and will continue to address issues arising with the Bedivere estate in a professional, mutually cooperative and beneficial manner.

## F. CLAIMS PROCESS

The Liquidator received 2,995 POCs as of December 31, 2024. The 2,995 figure includes additional POCs created when the Liquidator splits a single POC into two or more POCs for administrative reasons, such as a situation where a POC as filed includes amounts that fall into different priority classes. Notwithstanding the claim filing deadline of December 31, 2021, Bedivere continues to receive new POCs and many of these POCs may be considered timely filed if the POC claimant can show good cause for the late filing.

Many of the POCs filed by large insureds incorporate many claims within a single POC. Moreover, most insurance companies with reinsurance claims against Bedivere also filed a single POC incorporating all of their claims. Therefore, the POC count is not indicative of the actual and much larger number of open claims that need to be evaluated by the Liquidator.

Given the complexity of the claims, a Bedivere specific POC processing system was developed to record POCs, track status of POCs, issue NODs, track objections to NODs, issue reports, and ultimately issue and track distributions against NODs.

## 1. Status of POCs

Exhibit K displays a summary of POC Status and NODs issued by priority class. As of December 31, 2024, Bedivere has issued NODs for 2,146 POCs for a total allowed amount of \$25,833,516. These NODs are primarily for workers compensation claimants whose claims are being handled by GAs, claims written on policies issued by carriers that are not part of the Bedivere liquidation, and service invoices. On March 27, 2025, the Liquidator filed his annual claims report with the Commonwealth Court seeking approval of the priority class and allowed amount for 1,035 NODs.

Valuation of the Proofs of Claims can take several years as many claims are contingent claims and will not develop for some time or are dependent on resolution of underlying litigation, which may not be resolved for several years. In addition, Bedivere may defer review of POCs on claims accepted by the GA until which time the GA has made its final determination and returned the closed claim file to Bedivere.

## 2. Guaranty Association Proof of Claims

In addition to the POCs filed by individual claimants, a total of 56 GAs have filed an Omnibus POC representing their respective claims against the estate. While reviewing and evaluating all POCs filed with Bedivere by policyholders and other claimants, it will also be necessary to



review and evaluate administrative expense claims, loss and allocated loss adjustment expense claims, unearned premium claims, and other claims submitted by the GAs, and then reconcile the GAs quarterly expense reports and UDS data with Bedivere records.

As already noted in this report, the GAs have reported administrative expenses totaling \$26.8 million, payments for loss and allocated loss adjustment expense of \$69.6 million, and reserves for remaining loss and allocated loss adjustment expense of \$233.1 million as of December 31, 2024. These totals do not include an estimate of future GA administrative expenses.

## G. REINSURANCE

### 1. Reinsurance Background

Much of the ceded reinsurance relates to losses from accident years prior to 1985. Consequently, a significant portion of the original reinsurance is either unavailable due to prior commutation or uncollectible as a result of reinsurer insolvencies.

### 2. Reinsurance Billing and Collection

With that as background, as of December 31, 2024, reinsurance receivables and estimated future reinsurance recoverables were \$733.7

million after deductions for future uncollectible amounts. This amount will change as loss reserve adjustments are made, loss settlements with insureds are reached, and allowable setoffs with reinsurers are agreed.

Since the date of liquidation, reinsurance collections totaled \$106 million through December 31, 2024. This total is a combination of receipts from ordinary ceded loss billings and dispute settlements.

On a monthly basis, Bedivere receives GA data feeds reflecting paid and outstanding claim information. A portion of the GA paid losses are ceded to reinsurers. Therefore, this GA data is essential for Bedivere to produce post-liquidation reinsurance billings.

Bedivere deals with reinsurers who believe they have offset balances due to assumed reinsurance business written by Bedivere. The research and reconciliation analysis required for the offset process will continue for several years as claims from the assumed reinsurance business mature and are reported to the estate.

### 3. Reinsurance Collection Issues

Reinsurance is one of the largest assets of Bedivere and the structure, procedures and controls within the Reinsurance function and throughout the estate operations have been designed to maximize collections in a

liquidation environment. Bedivere's Reinsurance team, many of whom have both extensive reinsurance and liquidation experience, coordinates with reinsurers to provide appropriate claims documentation, respond to inquiries, resolve disputes and verify proper offsets. Bedivere also seeks additional cooperation and support from insureds, claimants and the GAs in providing timely, complete and accurate claims documentation and data to support reinsurance billings.

Notwithstanding these efforts, reinsurance collections are a difficult and lengthy process in liquidation. In many cases, time frames for responses and payments from reinsurers have lengthened. Collections result from constant, intensive day-to-day effort by the Reinsurance team, assisted by the Claims team and other Bedivere and Liquidator staff as and when needed. While some reinsurers deal with Bedivere in a professional, responsive manner, others do not. In some cases, reinsurers require significantly more documentation than pre-liquidation and often more than is contractually or customarily required. Legal actions against recalcitrant reinsurers may be commenced, as necessary, to enforce Bedivere's rights.

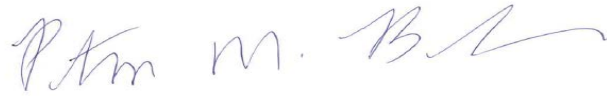
## H. ANCILLARY RECEIVERSHIPS

Ancillary receivership proceedings were initiated in New Mexico, New York and Oregon. In New York, the proceeding was initiated primarily to trigger the obligations of the GAs in their state. In Oregon and New Mexico, the proceeding was initiated to take possession of the statutory deposits so they could be transferred to their state's GA. It is believed that these GAs will fully participate in the estate, in which case their state deposit will be treated as early access.

#### I. LIST OF EXHIBITS

1. EXHIBIT A: Special Purpose Statement of Assets and Liabilities
2. EXHIBIT B: Special Purpose Statement of Policyholders Surplus
3. EXHIBIT C: Special Purpose Statement - Cash Flow Summary
4. EXHIBIT D: Notes to the Special Purpose Statement of Assets and Liabilities
5. EXHIBIT E: List of Investments
6. EXHIBIT F: Operating Expenses
7. EXHIBIT G: Legal Fees and Expenses
8. EXHIBIT H: Professional Service Expenses
9. EXHIBIT I: 2024 Operating Expense Budget
10. EXHIBIT J: Guaranty Association Loss and Expense Data
11. EXHIBIT K: POC Statistics

Respectfully Submitted,



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PRESTON M. BUCKMAN (I.D. #57570)  
Insurance Department Counsel  
Office of Liquidations, Rehabilitations  
& Special Funds  
Governor's Office of General Counsel  
Capital Associates Building  
901 North 7<sup>th</sup> Street  
Harrisburg, PA 17102  
(717) 886-2080

Attorney for Michael Humphreys, Insurance  
Commissioner of the Commonwealth of  
Pennsylvania, solely in his capacity as  
Liquidator of Bedivere Insurance Company,  
In Liquidation

Dated: March 31, 2025

# EXHIBIT A

**Bedivere Insurance Company (IN LIQUIDATION)**  
**Special Purpose Statements of Assets and Liabilities**  
**Unaudited (in Millions) \***

	Period Ending 12/31/2024	Period Ending 12/31/2023
<b><u>ASSETS</u></b>		
Short and intermediate duration investments	247.8	220.1
Special State Deposits	7.7	10.6
Trust Account Deposits	10.6	11.7
Deposits Transferred to State Guarantee Associations	38.4	36.0
Cash	6.1	8.9
<b>Total Cash and Invested Assets</b>	<b>310.7</b>	<b>287.3</b>
FAIR Plan Equity Receivable	6.6	10.6
Second Injury Fund Receivable	0.1	0.1
Reinsurance Receivable	24.5	29.7
Reinsurance Reserves	709.2	635.4
Early access advances to State Guarantee Associations	1.8	1.8
<b>Total Assets</b>	<b>1,052.9</b>	<b>964.8</b>
<b><u>LIABILITIES</u></b>		
	-	-
Secured Creditors - Funds Held	10.6	11.6
Estimated Priority Class:		
<b>A - Administrative Expenses</b>	-	-
Liquidator Expenses Incurred since Liquidation	52.8	38.9
Liquidator Expenses Paid since Liquidation	52.5	38.7
Liquidator Expenses - Unpaid	0.3	0.2
Guaranty Association Expenses Paid (as reported)	26.8	21.0
Guaranty Association Expenses Reserve	-	-
Guaranty Association Expenses - Unpaid	26.8	21.0
<b>Total Class (A) Liabilities</b>	<b>27.1</b>	<b>21.2</b>

**Bedivere Insurance Company (IN LIQUIDATION)**  
**Special Purpose Statements of Assets and Liabilities**  
**Unaudited (in Millions) \***

	Period Ending 12/31/2024	Period Ending 12/31/2023
<b>B- Claims for policy benefits</b>		
Guaranty Association Paid	69.6	56.6
Estimated Reserves - Guaranty Associations	233.1	273.2
Estimated Reserves - Other	<u>1,492.0</u>	<u>1,642.6</u>
Total Unsettled Claims - estimated reserves	1,794.7	1,972.5
Notices of determination		
Guaranty Association	-	-
All other	<u>22.3</u>	<u>1.6</u>
Total notices of determination	22.3	1.6
Gross class (B) liabilities	1,817.1	1,974.1
Asset distribution payments	-	-
<b>Net class (B) liabilities</b>	<b>1,817.1</b>	<b>1,974.1</b>
<b>Class (C) Creditors - Federal Government Claims</b>	-	-
<b>Class (D) Creditors - Certain Employee Claims</b>	-	-
<b>Class (E) Creditors - General Creditor Claims</b>	-	-
Guaranty association paid	-	-
Estimated reserves - Guaranty associations	-	-
Estimated reserves - Other	<u>1,601.2</u>	<u>950.4</u>
Total Unsettled Claims - estimated reserves	1,601.2	950.4
Notices of determination		
Guaranty Association	-	-
All other	<u>3.6</u>	<u>2.8</u>
Total notices of determination	3.6	2.8
<b>Gross class (E) liabilities</b>	<b>1,604.8</b>	<b>953.2</b>



**Bedivere Insurance Company (IN LIQUIDATION)**  
**Special Purpose Statements of Assets and Liabilities**  
**Unaudited (in Millions) \***

	Period Ending 12/31/2024	Period Ending 12/31/2023
<b>Class (F) Creditors - State and Local Government Claims</b>	-	-
<b>Class (G) Creditors - Late Filed Claims</b>	-	-
Notices of determination		
Guaranty Association	-	-
All other	<u>0.2</u>	<u>0.2</u>
Total notices of determination	0.2	0.2
<b>Gross class (G) liabilities</b>	0.2	0.2
<b>Class (H) Creditors - Surplus or Contribution Notes</b>	-	-
<b>Class (I) Creditors - Shareholders or Other Owners</b>	-	-
Funds Held	0.1	0.1
Other Liabilities	0.1	0.1
<b>Total Liabilities</b>	<b>3,460.2</b>	<b>2,960.5</b>
<b>Net Deficit</b>	<b>(2,407.3)</b>	<b>(1,995.7)</b>

\*See Notes to Special Purpose Statement of Assets and Liabilities in Exhibit D

# EXHIBIT B

**Bedivere Insurance Company (IN LIQUIDATION)**  
**Special Purpose Statements of Policyholders Surplus**  
**Unaudited (in Millions)**

	Period Ending 12/31/2024	Period Ending 12/31/2023
Policyholders' Surplus - beginning of period	(1,995.7)	(1,457.1)
Liquidator Expense	(13.9)	(13.7)
Underwriting Income/Loss	(409.3)	(536.2)
Net Investment Income	9.4	5.9
Other income/(expense)	0.3	0.2
Net realized and unrealized capital gains/(losses)	1.8	5.2
Change in Reinsurance Provision	-	-
Change in Deferred Income Tax	-	-
Change in Non Admitted Assets	-	-
Change in Foreign Exchange	-	-
Change in policyholders' surplus	(411.6)	(538.6)
Policyholders' surplus - end of period	(2,407.3)	(1,995.7)

# EXHIBIT C

**Bedivere Insurance Company (IN LIQUIDATION)**  
**Special Purpose Statement - Cash Flow Summary 1/1/2024 – 12/31/2024**  
**Unaudited (In Millions)**

**Beginning Available Cash at 1/1/2024** **287.3**

**Sources of Cash**

Reinsurance Collections 22.7  
 Total Claim Recoveries 0.2

Other Sources  
     Pools and Associations 3.8  
     Transfer from Investments 1.2  
     Other 3.2  
 Total Other Sources 8.2

**Total Incoming Cash** **31.1**

**Uses of Cash**

Operating Expenses 13.7  
 Transfer to Investment Account 17.0  
 Other 3.0

**Total Outgoing Cash** **33.7**

**Net Change In Investments from Cash Activity** **24.3**

**Non-Cash Items Affecting Investments**

Unrealized Gain (Loss) on Investments 1.7

**Net Change in Investments from Non-Cash Activity** **1.7**

**Ending Available Cash & Investments at 12/31/2024** **310.7**

# EXHIBIT D

Bedivere Insurance Company (In Liquidation)  
Notes to Special Purpose Statement of Assets and Liabilities

The Special Purpose Statement of Assets and Liabilities of Bedivere Insurance Company (In Liquidation) is prepared on a unique financial basis in that the statement does not reflect the effect of the companies' liquidation. The liquidation process will result in the realization of amounts on transfer or disposition of assets and in the satisfaction of liabilities at amounts that may be substantially different than those reflected in the accompanying statement of assets and liabilities. The statement does not include any adjustments that might result from outcomes of the uncertainties related to the future effects of the liquidation and various potential exposures, recoveries, or benefits. Specifically, the following facts should be noted in reviewing the accompanying Special Purpose Statement of Assets and Liabilities:

- Estimated priority class of claims from the insurers' estates is set forth in detail in Article V of the Commonwealth of Pennsylvania Insurance Department Act of 1921 at 40 P.S. §221.44. The classes are:
  - A. Administrative expenses
  - B. Claims for policy benefits
  - C. Federal government claims
  - D. Certain employee claims
  - E. General creditor claims including Assumed Reinsurance
  - F. State and local government claims
  - G. Late filed claims, Contribution claims, and Subrogation claims
  - H. Surplus or Contribution Notes
  - I. Shareholders or Other Owners

Note: Administrative expenses include both the guaranty association's expenses related to administering the claims of the companies in liquidation and the Liquidator's expenses.

- The recorded priority class B reflected on the Special Purpose Statement of Assets and Liabilities is based primarily on guaranty association paid claims and reserves as reported, known case reserves established by Bedivere, and actuarial estimates of expected losses calculated as of November 30, 2024 on an undiscounted basis. At this stage of the liquidation, there is still much uncertainty surrounding estimates of known case reserves and actuarial estimates.
- The statement includes a general provision for estimated unrealizable reinsurance recoverable assets. The statement does not reflect provisions for future reinsurance insolvencies or other industry issues that may result in compromised collections.
- There is no provision for future internal operating costs to execute the activities and responsibilities of the estate in the liquidation process through the date of the final liquidation of the estate.

- There is no provision for any potential federal income tax liability for future years, if any.

The Special Purpose Statement of Assets and Liabilities is not intended to be in conformity with, and may vary significantly from, Generally Accepted Accounting Principles (GAAP) and Statutory Accounting Practices (SAP) for a property and casualty insurance company as prescribed by the National Association of Insurance Commissioners (NAIC). Certain presentation reclassifications have been made to reflect the estimated priority classes.



# EXHIBIT E

Bedivere Insurance Company (In Liquidation)					
Listing of Investments - As of 12/31/2024					
Identifier	Description	Current Units	Security Type	Effective Maturity	Market Value + Accrued and Due Interest (US\$)
100AB5004	JPMORGAN DEPOSIT ACCT A ADVISORY NON RET JPMC	8,204,355.11	MMFUND	12/31/2024	8,204,355.11
912828ZC7	UNITED STATES TREASURY	100,000.00	US GOV	02/28/2025	99,866.63
912828ZC7	UNITED STATES TREASURY	30,000.00	US GOV	02/28/2025	29,959.99
9128284F4	UNITED STATES TREASURY	760,000.00	US GOV	03/31/2025	762,009.62
9128284M9	UNITED STATES TREASURY	5,000,000.00	US GOV	04/30/2025	5,000,401.42
9128285C0	UNITED STATES TREASURY	3,700,000.00	US GOV	09/30/2025	3,694,250.52
9128285J5	UNITED STATES TREASURY	4,000,000.00	US GOV	10/31/2025	3,979,302.49
91282CKH3	UNITED STATES TREASURY	8,000,000.00	US GOV	03/31/2026	8,114,478.02
91282CKH3	UNITED STATES TREASURY	5,000,000.00	US GOV	03/31/2026	5,071,548.76
9128286S4	UNITED STATES TREASURY	1,600,000.00	US GOV	04/30/2026	1,567,758.29
91282CKK6	UNITED STATES TREASURY	5,000,000.00	US GOV	04/30/2026	5,080,809.74
91282CLH2	UNITED STATES TREASURY	5,000,000.00	US GOV	08/31/2026	5,025,427.31
91282CME8	UNITED STATES TREASURY	2,000,000.00	US GOV	12/31/2026	2,000,547.31
91282CKZ3	UNITED STATES TREASURY	10,000,000.00	US GOV	07/15/2027	10,230,230.98
91282CLL3	UNITED STATES TREASURY	5,000,000.00	US GOV	09/15/2027	4,937,064.05
91282CLL3	UNITED STATES TREASURY	1,800,000.00	US GOV	09/15/2027	1,777,343.06
91282CLL3	UNITED STATES TREASURY	2,500,000.00	US GOV	09/15/2027	2,468,532.03
91282CJA0	UNITED STATES TREASURY	5,000,000.00	US GOV	09/30/2028	5,107,520.60
91282CJA0	UNITED STATES TREASURY	1,800,000.00	US GOV	09/30/2028	1,838,707.42
91282CJA0	UNITED STATES TREASURY	2,500,000.00	US GOV	09/30/2028	2,553,760.30
91282CLK5	UNITED STATES TREASURY	1,400,000.00	US GOV	08/31/2029	1,373,493.78
3133ERTF8	FEDERAL FARM CREDIT BANKS FUNDING CORP	5,000,000.00	AGCY BOND	03/17/2027	5,060,293.33
3130B2HS7	FEDERAL HOME LOAN BANKS	2,110,000.00	AGCY BOND	02/13/2025	2,147,889.50
3130B2Q24	FEDERAL HOME LOAN BANKS	5,000,000.00	AGCY BOND	09/30/2027	5,011,009.44
3130B2HU2	FEDERAL HOME LOAN BANKS	4,460,000.00	AGCY BOND	08/18/2028	4,536,431.52
3130B2MK8	FEDERAL HOME LOAN BANKS	5,000,000.00	AGCY BOND	09/19/2028	5,064,053.33
3130B2TX3	FEDERAL HOME LOAN BANKS	5,000,000.00	AGCY BOND	09/10/2029	4,963,657.22
3130B35Y5	FEDERAL HOME LOAN BANKS	5,000,000.00	AGCY BOND	10/11/2029	5,033,944.44
3130B3JN4	FEDERAL HOME LOAN BANKS	3,150,000.00	AGCY BOND	10/30/2029	3,158,324.23
3134HATM5	FEDERAL HOME LOAN MORTGAGE CORP	5,000,000.00	AGCY BOND	10/21/2027	5,035,245.56
3134HAVX8	FEDERAL HOME LOAN MORTGAGE CORP	5,000,000.00	AGCY BOND	11/05/2029	5,041,703.33
3134HAXT5	FEDERAL HOME LOAN MORTGAGE CORP	5,000,000.00	AGCY BOND	11/07/2029	5,024,407.78
3134HAD26	FEDERAL HOME LOAN MORTGAGE CORP	5,000,000.00	AGCY BOND	11/19/2029	5,022,906.67
3135GAUC3	FEDERAL NATIONAL MORTGAGE ASSOCIATION	3,000,000.00	AGCY BOND	08/27/2029	3,049,808.00
3135GAY39	FEDERAL NATIONAL MORTGAGE ASSOCIATION	5,000,000.00	AGCY BOND	10/30/2029	5,029,636.11
3135GAYT2	FEDERAL NATIONAL MORTGAGE ASSOCIATION	5,000,000.00	AGCY BOND	11/02/2028	5,020,738.89
3132DWLT8	FH SD8438	9,316,363.40	FHLMC	12/01/2053	9,231,661.20
3618N5A41	G2 MB0026	4,990,461.80	GNMA	11/01/2054	4,968,349.58
00775VAA2	AEGON FUNDING COMPANY LLC	1,500,000.00	CORP	03/16/2027	1,531,863.50
00774MAN5	AERCAP IRELAND CAPITAL DAC	1,000,000.00	CORP	06/15/2025	1,036,954.22
025816DL0	AMERICAN EXPRESS CO	1,700,000.00	CORP	10/30/2025	1,738,605.96
02666TAA5	AMERICAN HOMES 4 RENT LP	1,800,000.00	CORP	02/15/2028	1,784,121.40
02665WFC0	AMERICAN HONDA FINANCE CORP	2,500,000.00	CORP	03/12/2027	2,509,440.89
031162DM9	AMGEN INC	1,250,000.00	CORP	03/02/2025	1,273,008.96
04010LAV5	ARES CAPITAL CORP	1,500,000.00	CORP	03/01/2025	1,516,903.00
04685A2L4	ATHENE GLOBAL FUNDING	1,000,000.00	CORP	01/14/2025	1,010,535.22

<b>Bedivere Insurance Company (In Liquidation)</b>					
<b>Listing of Investments - As of 12/31/2024</b>					
<b>Identifier</b>	<b>Description</b>	<b>Current Units</b>	<b>Security Type</b>	<b>Effective Maturity</b>	<b>Market Value + Accrued and Due Interest (US\$)</b>
04685A2U4	ATHENE GLOBAL FUNDING	1,500,000.00	CORP	01/08/2026	1,459,177.58
06051GJS9	BANK OF AMERICA CORP	2,500,000.00	CORP	07/22/2027	2,404,158.75
06406RBJ5	BANK OF NEW YORK MELLON CORP	2,500,000.00	CORP	07/24/2026	2,534,517.36
09261HAP2	BLACKSTONE PRIVATE CREDIT FUND	500,000.00	CORP	01/15/2025	505,485.50
09261HAT4	BLACKSTONE PRIVATE CREDIT FUND	1,000,000.00	CORP	03/24/2025	1,011,580.89
69121KAB0	BLUE OWL CAPITAL CORP	1,000,000.00	CORP	03/30/2025	1,006,857.11
10112RAY0	BOSTON PROPERTIES LP	1,800,000.00	CORP	10/01/2026	1,744,421.40
10921U2J6	BRIGHTHOUSE FINANCIAL GLOBAL FUNDING	2,500,000.00	CORP	04/09/2027	2,552,679.17
14040HCM5	CAPITAL ONE FINANCIAL CORP	1,500,000.00	CORP	03/03/2026	1,504,840.83
172967KJ9	CITIGROUP INC	1,500,000.00	CORP	03/09/2026	1,517,680.67
126650DF4	CVS HEALTH CORP	1,750,000.00	CORP	08/15/2026	1,713,822.83
247361ZX9	DELTA AIR LINES INC	1,000,000.00	CORP	05/01/2025	1,014,166.67
254709AM0	DISCOVER FINANCIAL SERVICES	1,800,000.00	CORP	02/09/2027	1,795,844.20
29273RBG3	ENERGY TRANSFER LP	1,800,000.00	CORP	01/15/2026	1,838,606.00
302635AH0	FS KKR CAPITAL CORP	1,000,000.00	CORP	01/15/2027	956,998.17
38151LAG5	GOLDMAN SACHS BANK USA	2,500,000.00	CORP	05/21/2026	2,526,761.39
U24652AT3	HARLEY-DAVIDSON FINANCIAL SERVICES INC	1,500,000.00	CORP	06/08/2025	1,490,121.42
404119BR9	HCA INC	1,000,000.00	CORP	02/01/2025	1,022,818.83
40434LAA3	HP INC	1,500,000.00	CORP	06/17/2025	1,484,408.33
USY3815NBC49	HYUNDAI CAPITAL SERVICES INC	2,500,000.00	CORP	02/08/2026	2,412,038.19
45674CAA1	INFOR LLC	1,500,000.00	CORP	07/15/2025	1,483,557.67
458140AX8	INTEL CORP	1,800,000.00	CORP	05/11/2027	1,732,525.20
465685AR6	ITC HOLDINGS CORP	1,500,000.00	CORP	08/22/2027	1,524,273.75
472319AE2	JEFFERIES FINANCIAL GROUP INC	1,500,000.00	CORP	06/08/2027	1,558,289.75
53944YAT0	LLOYDS BANKING GROUP PLC	1,800,000.00	CORP	08/11/2026	1,828,422.00
548661DM6	LOWE'S COMPANIES INC	1,500,000.00	CORP	04/15/2026	1,469,069.67
55607PAE5	MACQUARIE GROUP LTD	1,000,000.00	CORP	09/23/2026	1,003,474.49
571903BD4	MARRIOTT INTERNATIONAL INC	527,000.00	CORP	04/01/2025	532,827.21
571676AT2	MARS INC	2,500,000.00	CORP	04/20/2028	2,499,601.53
577081BE1	MATTEL INC	500,000.00	CORP	04/01/2026	493,773.75
577081BE1	MATTEL INC	1,000,000.00	CORP	04/01/2026	987,547.50
595017BK9	MICROCHIP TECHNOLOGY INC	1,750,000.00	CORP	03/15/2028	1,747,741.92
64953BBF4	NEW YORK LIFE GLOBAL FUNDING	2,500,000.00	CORP	09/18/2026	2,574,672.64
665772BN8	NORTHERN STATES POWER CO	1,000,000.00	CORP	07/01/2025	1,046,709.00
718172BT5	PHILIP MORRIS INTERNATIONAL INC	2,500,000.00	CORP	02/25/2026	2,472,277.50
74256LEP0	PRINCIPAL LIFE GLOBAL FUNDING II	2,500,000.00	CORP	08/16/2026	2,381,766.25
743917AH9	PRUDENTIAL INSURANCE COMPANY OF AMERICA	1,000,000.00	CORP	07/01/2025	1,056,783.00
75820QAC6	RELX CAPITAL INC	1,000,000.00	CORP	05/15/2025	1,017,439.33
189754AA2	TAPESTRY INC	1,500,000.00	CORP	04/01/2025	1,509,549.00
87612BBG6	TARGA RESOURCES PARTNERS LP	1,800,000.00	CORP	01/15/2028	1,821,250.00
89788MAD4	TRUIST FINANCIAL CORP	1,750,000.00	CORP	03/02/2027	1,684,308.74
902494BJ1	TYSON FOODS INC	1,500,000.00	CORP	03/01/2026	1,509,599.00
225401AY4	UBS GROUP AG	2,500,000.00	CORP	07/15/2025	2,587,741.53
92564RAJ4	VICI PROPERTIES LP	1,800,000.00	CORP	11/01/2026	1,853,012.40
254687DF0	WALT DISNEY CO	1,400,000.00	CORP	10/30/2025	1,449,584.11
95000U2K8	WELLS FARGO & CO	1,500,000.00	CORP	02/11/2026	1,508,507.33
JHANGA863	John Hancock Guaranteed Annuity 863	225,000.00	GENERIC	---	225,000.00
		<b>246,673,180.31</b>			<b>247,775,150.27</b>

# EXHIBIT F

**Bedivere Insurance Company (IN LIQUIDATION)**  
**Operating Expenses**  
**For the Period January 1, 2024 - December 31, 2024**  
**Unaudited**

<b>Category</b>	<b>Amount</b>	<b>Budget</b>	<b>Variance</b>	<b>2023 Actual</b>
Service Provider Fees	11,192,983	10,948,819	244,164	10,842,822
Legal Fees	441,862	2,300,000	(1,858,138)	558,995
Record Storage	1,123,576	1,083,600	39,976	1,092,229
Liquidator Consultant Fees	745,076	1,000,000	(254,924)	794,109
Liquidation Office Fees	256,633	600,000	(343,367)	344,598
Bank Fees	-	84,000	(84,000)	75,483
Other Professional Services	-	20,000	(20,000)	11,360
Change in Accrued Expense	94,420	.0	94,420	
Other Expense	3,000	.0	3,000	
<b>Total</b>	<b>13,857,551</b>	<b>16,036,419</b>	<b>(2,178,868)</b>	<b>13,719,596</b>

# EXHIBIT G

**Bedivere Insurance Company (IN LIQUIDATION)**  
**Legal Fees and Expenses (excluding ALAE)**  
**For the Period January 1, 2024 - December 31, 2024**  
**Unaudited**

<b>VENDOR NAME</b>	<b>Amount</b>
Barrasso Usdin Kupperman Freeman Sarver	4,605
Clyde & Co.	1,170
Consilio, LLC	9,819
Cozen O'Connor	291,636
Forsberg & Umlauf P.S.	5,663
HDDRe Strategies LLC	26,895
Mendes & Mount LLP	1,934
Metzger Law Firm	8,386
Musick Peeler & Garrett, LLP	1,596
Norris Chaplin Schroeder	635
Peter A Gentile	10,260
Stoll Keenon Ogden LLC	6,310
Stradley Ronon Stevens & Young LLP	72,069
Taylor Wellons Politz Duhe APLC	315
Tressler LLP Operating	572
	<hr/>
<b>Total Legal Fees &amp; Expenses</b>	<b><u><u>441,862</u></u></b>

# EXHIBIT H



**Bedivere Insurance Company (IN LIQUIDATION)**  
**Professional Service Expenses**  
**For the Period January 1, 2024 - December 31, 2024**  
**Unaudited**

<b>VENDOR NAME</b>	<b>Amount</b>
Access Information Protected	43,840
A.G. Risk Management, Inc	11,192,983
Anselma Capital, LLC	259,630
Bayshore Consulting, LLC	338,188
Burgess Consulting, LLC	140,825
Guaranty Support, Inc.	6,434
Iron Mountain	1,079,736
Statutory Liquidation	256,633
Total Other Vendors under \$5,000	<u>3,000</u>
<b>Total Professional Services Expense</b>	<b>13,321,269</b>

# EXHIBIT I

**Bedivere Insurance Company (IN LIQUIDATION)**  
**Operating Expense Budget**  
**For the Period January 1, 2025 - December 31, 2025**

<b>Category</b>	<b>Amount</b>
Service Provider Fees	12,214,312
Legal Fees	1,500,000
Record Storage	1,140,000
Liquidator Consultants Fees	1,000,000
Liquidation Office Fees	240,000
Bank Fees	78,000
Professional Services	90,000
<b>Total</b>	<b>16,262,312</b>

# EXHIBIT J

**Guaranty Association Loss and Expense Data**  
As of 12/31/2024

State	Loss & ALAE Paid	Loss & ALAE Reserves	Total Claim Amount Incurred	Admin Expense	Total by State
AK	\$67,429	\$763,571	\$831,000	\$3,708	\$834,708
AL	\$176,984	\$1,969,834	\$2,146,818	\$158,895	\$2,305,713
AR	\$49,911	\$484,974	\$534,885	\$55,274	\$590,159
AZ	\$181,343	\$891,136	\$1,072,479	\$33,304	\$1,105,783
AZ-WC	\$0		\$0		\$0
CA	\$4,703,766	\$8,859,551	\$13,563,317	\$2,161,470	\$15,724,786
CO	\$183,159	\$791,549	\$974,708	\$96,671	\$1,071,379
CT	\$2,565,230	\$5,180,115	\$7,745,346	\$1,532,752	\$9,278,097
DC	\$492,356	\$885,567	\$1,377,923	\$38,990	\$1,416,913
DE	\$36,853	\$16,011	\$52,863	\$48,178	\$101,041
FL	\$0		\$0		\$0
FL-WC	\$1,676,480	\$5,031,321	\$6,707,801	\$322,053	\$7,029,854
GA	\$575,949	\$2,794,997	\$3,370,946	\$456,772	\$3,827,718
HI	\$7,713	\$50,115	\$57,828	\$25,285	\$83,113
IA	\$17,315	\$203,623	\$220,939	\$16,802	\$237,741
ID	\$2,164,719	\$5,947,180	\$8,111,898	\$28,457	\$8,140,355
IL	\$963,904	\$3,785,030	\$4,748,933	\$461,992	\$5,210,926
IN	\$22,410	\$166,516	\$188,926	\$645,443	\$834,369
KS	\$360,975	\$2,421,851	\$2,782,826	\$134,662	\$2,917,488
KY	\$434,423	\$1,630,890	\$2,065,312	\$167,348	\$2,232,660
LA	\$7,356,371	\$12,368,931	\$19,725,302	\$2,656,227	\$22,381,529
MA	\$9,213,326	\$23,795,665	\$33,008,992	\$2,022,799	\$35,031,790
MD	\$782,981	\$3,943,512	\$4,726,492	\$312,992	\$5,039,484
ME	\$3,464,206	\$10,480,030	\$13,944,237	\$1,506,200	\$15,450,436
MI	\$740,139	\$3,078,707	\$3,818,845	\$407,974	\$4,226,819
MN	\$1,889,636	\$1,279,260	\$3,168,897	\$205,505	\$3,374,401
MO	\$849,663	\$2,235,065	\$3,084,728	\$334,124	\$3,418,852
MS	\$737,904	\$152,774	\$890,678	\$157,212	\$1,047,890
MT	\$106,362	\$58,657	\$165,020	\$25,897	\$190,916
NC	\$287,376	\$1,097,482	\$1,384,858	\$607,700	\$1,992,558
ND	\$0		\$0		\$0
NE	\$15,758	\$66,896	\$82,654	\$7,080	\$89,734
NH	\$450,535	\$1,897,908	\$2,348,443	\$588,411	\$2,936,854
NJ	\$1,053,867	\$5,012,057	\$6,065,924	\$779,503	\$6,845,427
NJ-WC	\$5,009,560	\$20,212,486	\$25,222,046	\$1,066,123	\$26,288,169
NM	\$26,305	\$22,566	\$48,871	\$6,609	\$55,480
NV	\$0	\$0	\$0	\$1,676	\$1,676

NY	\$4,840,963	\$15,756,463	\$20,597,426	\$3,330,456	\$23,927,883
NY-WC	\$5,029,534	\$34,073,794	\$39,103,328	\$1,229,575	\$40,332,903
OH	\$2,860	\$23,237	\$26,097	\$218,460	\$244,557
OK	\$40,978	\$100,150	\$141,128	\$30,725	\$171,853
OR	\$348,354	\$3,657,539	\$4,005,893	\$88,283	\$4,094,176
PA	\$2,035,503	\$32,000,052	\$34,035,555	\$1,015,924	\$35,051,479
PA-WC	\$3,116,643	\$9,596,370	\$12,713,013	\$1,519,964	\$14,232,978
PA-ACP	\$5,069,082	\$0	\$5,069,082	\$133,733	\$5,202,815
RI	\$68,716	\$462,780	\$531,496	\$151,604	\$683,100
SC	\$145,756	\$274,958	\$420,714	\$30,143	\$450,857
SD	\$164	\$0	\$164	\$11,429	\$11,594
TN	\$202,443	\$1,130,006	\$1,332,450	\$388,440	\$1,720,890
TX	\$1,181,122	\$5,370,483	\$6,551,604	\$392,912	\$6,944,516
UT	\$26,365	\$51,736	\$78,100	\$17,144	\$95,244
VA	\$227,634	\$522,972	\$750,606	\$137,560	\$888,166
VT	\$128,043	\$99,459	\$227,502	\$14,418	\$241,920
WA	\$368,127	\$1,063,753	\$1,431,880	\$690,322	\$2,122,201
WI	\$113,273	\$1,365,546	\$1,478,819	\$238,385	\$1,717,204
WV	\$0	\$0	\$0	\$77,594	\$77,594
WY	\$0	\$0	\$0	\$0	\$0
	\$69,610,465	\$233,125,127	\$302,735,592	\$26,791,159	\$329,526,750

# EXHIBIT K

**Proof Of Claim Statistics - Inception to Date**

**12/31/2024**

Class Description	Total POCs Received	POCs Received After 12/31/21	Total NODs Issued	Total NOD Allowed Amounts	Total NODs Approved for Distribution	Total NOD Allowed Amounts Approved for Distribution
A - Admin Costs and Expenses	1	-	1	-	1	-
B - Policy Claims	1,232	87	779	\$22,036,616	298	1,613,940
C - Federal Gov't	1	-	-	-	-	-
D - Employees	-	-	-	-	-	-
E - General Creditors	1,157	30	896	\$3,593,594	756	2,601,754
F - State/Local Gov't	3	-	3	-	3	-
G - Late Filed/Contribution	599	6	465	203,306	39	203,306
H - Surplus	2	-	2	-	2	-
I - Shareholders, Other Owners						
<b>Total:</b>	2,995	123	2,146	\$25,833,516	1,099	4,419,000



**Objection Statistics - Inception To Date**

**12/31/2024**

Class Description	Number of NOD Objections Received	Liquidator Allowed Amounts On Objections Received	Number of NOD Objections Resolved	Liquidator Allowed Amounts On Objections Resolved
A - Admin Costs and Expenses				
B - Policy Claims	2	\$0.00	2	\$0.00
C - Federal Gov't				
D - Employees				
E - General Creditors				
F - State/Local Gov't				
G - Late Filed/Contribution	2	\$0.00	2	\$0.00
H - Surplus				
I - Shareholders, Other Owners				
<b>Total:</b>	4	\$0.00	4	\$0.00

Class Description	Number of Objections Unresolved	Liquidator Allowed Amount On Objections Unresolved	Number of Objections Unresolved Assigned To Referees	Liquidator Allowed Amounts On Objections Unresolved Assigned To Referees	Number of Objections Not Assigned to Referees	Liquidator Allowed Amounts On Objections Unresolved Not Assigned To Referees
A - Admin Costs and Expenses						
B - Policy Claims						
C - Federal Gov't						
D - Employees						
E - General Creditors						
F - State/Local Gov't						
G - Late Filed/Contribution						
H - Surplus						
I - Shareholders, Other Owners						
<b>Total:</b>						

**NONE**

**CERTIFICATION OF COMPLIANCE  
WITH PUBLIC ACCESS POLICY**

I certify that this filing complies with the provisions of the Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts that require filing confidential information and documents differently than non-confidential information and documents.



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PRESTON M. BUCKMAN (I.D. #57570)  
Insurance Department Counsel  
Office of Liquidations, Rehabilitations  
& Special Funds  
Governor's Office of General Counsel  
Capital Associates Building  
901 North 7<sup>th</sup> Street  
Harrisburg, PA 17102  
(717) 886-2080

*Attorney for Michael Humphreys, Insurance  
Commissioner of the Commonwealth of  
Pennsylvania, in his capacity as Statutory  
Liquidator of Bedivere Insurance Company,  
In Liquidation*

Dated: March 31, 2025

## CERTIFICATE OF SERVICE

I hereby certify that I am this day serving the foregoing document upon all parties of record in this proceeding, in accordance with Pa.R.A.P. 3780, in the following manner:

Service via e-service or email addressed as follows:

Counsel for the Statutory Liquidator of Bedivere Insurance Company:

Michael J. Broadbent, Esq.  
[mbroadbent@cozen.com](mailto:mbroadbent@cozen.com)  
Cozen O'Connor  
One Liberty Place  
1650 Market Street, Suite 2800  
Philadelphia, PA 19103  
(215) 665-4732

### NON-PARTIES:

Counsel for Pennsylvania Property & Casualty Insurance Guaranty Association (PPCIGA):

H. Marc Tepper, Esq.  
[marc.tepper@bipc.com](mailto:marc.tepper@bipc.com)  
Buchanan Ingersoll & Rooney PC  
Two Liberty Place  
50 South 16<sup>th</sup> Street, Suite 3200  
Philadelphia, PA 19102  
(215) 665-3864  
(215) 665-8760 (Fax)

Counsel for Colgate-Palmolive Co.:

Adam Budesheim, Esquire

[abudesheim@mccarter.com](mailto:abudesheim@mccarter.com)

Gregory Horowitz, Esquire

[ghorowitz@mccarter.com](mailto:ghorowitz@mccarter.com)

David Kane, Esquire

[dkane@mccarter.com](mailto:dkane@mccarter.com)

McCarter & English, LLP

Four Gateway Center

100 Mulberry Street

Newark, NJ 07102

(973) 622-4444

(973) 624-7070 (Fax)

Joann Lytle, Esquire

[jlytle@mccarter.com](mailto:jlytle@mccarter.com)

McCarter & English, LLP

1600 Market Street, Suite 3900

Philadelphia, PA 19103

(215) 979-3800

(215) 979-3899 (Fax)

*Counsel for Dickinson College:*

Michael T. Traxler, Esq.

[mtt@saxtonstump.com](mailto:mtt@saxtonstump.com)

Saxton & Stump

4250 Crums Mill Road, Suite 201

Harrisburg, PA 17112

(717) 941-1216

717) 547-1900 (Fax)

*Counsel for Atlantic Specialty Insurance Company:*

Paul M. Hummer, Esquire

[Paul.hummer@saul.com](mailto:Paul.hummer@saul.com)

Saul Ewing Arnstein & Lehr LLP

1500 Market Street, 38<sup>th</sup> Floor

Philadelphia PA 19102

(215) 972-7777

(215) 972-7725 (Fax)

Counsel for Celanese Corporation:

William F. Greaney, Esquire

[wgreaney@cov.com](mailto:wgreaney@cov.com)

Scott J. Levitt, Esquire

[slevitt@cov.com](mailto:slevitt@cov.com)

Covington & Burling LLP

850 Tenth Street, N.W.

Washington, DC 20001

(202) 662-6000

(202) 662-6291 (Fax)

Counsel for American Casualty Company of Reading, PA, Columbia Casualty Company, Continental Casualty Company, CAN Casualty Company of California, The Continental Insurance Company, National Fire Insurance Company of Hartford, as successor-in-interest to Transcontinental Insurance Company, Transportation Insurance Company:

Pamela Dunlop Gates, Esquire

[Pamela.dunlopgates@cna.com](mailto:Pamela.dunlopgates@cna.com)

CNA Coverage Litigation Group

Plaza of the Americas

700 North Pearl Street, Suite 450

Dallas, TX 75201

(214) 220-5921

(214) 336-8229 (Remote Working Direct)

(214) 775-4124 (Fax)

Melissa A. Cornibe, Esquire

[Melissa.cornibe@cna.com](mailto:Melissa.cornibe@cna.com)

CNA Coverage Litigation Group

Three Radnor Corporate Center

100 Matsonford Road, Suite 200

Radnor, PA 19087

(610) 964-5828

Counsel for Allianz Reinsurance America, Inc.:

Sommer Ross, Esquire

[SLRoss@duanemorris.com](mailto:SLRoss@duanemorris.com)

Duane Morris LLP  
1201 North Market Street, Suite 501  
Wilmington, DE 19801  
(302) 657-4951  
(302) 657-4901 (Fax)

*Counsel for Archdiocese of New Orleans:*

Abraham J. Rein, Esq.  
[arein@postschell.com](mailto:arein@postschell.com)  
Post & Schell, P.C.  
4 Penn Center  
1600 John F. Kennedy Blvd.  
Philadelphia, PA 19103-2808  
(215) 587-1057  
(215) 587-1444 (Fax)

*Counsel for Plaintiff F.B.*

Ana Kull, Esq.  
[akull@levylaw.com](mailto:akull@levylaw.com)  
Madeleine Skaller, Esq.  
[mskaller@levylaw.com](mailto:mskaller@levylaw.com)  
Levy Konigsberg, LLP  
605 Third Ave., 33rd Fl  
New York, NY 10158  
(212) 605-6200  
(212) 605-6290 (Fax)


*Counsel for Pennsylvania Assigned Claim Plan*

Jason M. Banonis, Esq.  
[jmbanonis@mdwgc.com](mailto:jmbanonis@mdwgc.com)  
Marshall Dennehey  
620 Freedom Business Center  
Suite 300  
King of Prussia, PA 19406  
(610) 354-8250  
(610) 354-8299 (Fax)

(484)895-2338 (Direct Dial)

*Interested Non-Party*

Steven B. Davis, Esq.  
[SBDavis@duanemorris.com](mailto:SBDavis@duanemorris.com)  
Duane Morris LLP  
30 South 17<sup>th</sup> Street  
Philadelphia, PA 19103-4196  
(215) 979-1275



---

PRESTON M. BUCKMAN (I.D. #57570)  
Insurance Department Counsel  
Office of Liquidations, Rehabilitations & Special  
Funds  
Governor's Office of General Counsel  
Capital Associates Building  
901 N. Seventh Street  
Harrisburg, PA 17102  
(717) 886-2080

*Attorney for Michael Humphreys, Insurance  
Commissioner of the Commonwealth of  
Pennsylvania, in his capacity as Statutory  
Liquidator of Bedivere Insurance Company, In  
Liquidation.*

Dated: March 31, 2025

## CERTIFICATE OF SERVICE

I hereby certify that I am this day serving the foregoing document upon all parties of record in this proceeding, in accordance with Pa.R.A.P. 3780, in the following manner:

Service via e-service or email addressed as follows:

Counsel for the Statutory Liquidator of Bedivere Insurance Company:

Michael J. Broadbent, Esq.  
[mbroadbent@cozen.com](mailto:mbroadbent@cozen.com)  
Cozen O'Connor  
One Liberty Place  
1650 Market Street, Suite 2800  
Philadelphia, PA 19103  
(215) 665-4732

### NON-PARTIES:

Counsel for Pennsylvania Property & Casualty Insurance Guaranty Association (PPCIGA):

H. Marc Tepper, Esq.  
[marc.tepper@bipc.com](mailto:marc.tepper@bipc.com)  
Buchanan Ingersoll & Rooney PC  
Two Liberty Place  
50 South 16<sup>th</sup> Street, Suite 3200  
Philadelphia, PA 19102  
(215) 665-3864  
(215) 665-8760 (Fax)

Counsel for Colgate-Palmolive Co.:

Adam Budesheim, Esquire



[abudesheim@mccarter.com](mailto:abudesheim@mccarter.com)

Gregory Horowitz, Esquire

[ghorowitz@mccarter.com](mailto:ghorowitz@mccarter.com)

David Kane, Esquire

[dkane@mccarter.com](mailto:dkane@mccarter.com)

McCarter & English, LLP

Four Gateway Center

100 Mulberry Street

Newark, NJ 07102

(973) 622-4444

(973) 624-7070 (Fax)

Joann Lytle, Esquire

[jlytle@mccarter.com](mailto:jlytle@mccarter.com)

McCarter & English, LLP

1600 Market Street, Suite 3900

Philadelphia, PA 19103

(215) 979-3800

(215) 979-3899 (Fax)

*Counsel for Dickinson College:*

Michael T. Traxler, Esq.

[mtt@saxtonstump.com](mailto:mtt@saxtonstump.com)

Saxton & Stump

4250 Crums Mill Road, Suite 201

Harrisburg, PA 17112

(717) 941-1216

717) 547-1900 (Fax)

*Counsel for Atlantic Specialty Insurance Company:*

Paul M. Hummer, Esquire

[Paul.hummer@saul.com](mailto:Paul.hummer@saul.com)

Saul Ewing Arnstein & Lehr LLP

1500 Market Street, 38<sup>th</sup> Floor

Philadelphia PA 19102

(215) 972-7777

(215) 972-7725 (Fax)

Counsel for Celanese Corporation:

William F. Greaney, Esquire

[wgreaney@cov.com](mailto:wgreaney@cov.com)

Scott J. Levitt, Esquire

[slevitt@cov.com](mailto:slevitt@cov.com)

Covington & Burling LLP

850 Tenth Street, N.W.

Washington, DC 20001

(202) 662-6000

(202) 662-6291 (Fax)

Counsel for American Casualty Company of Reading, PA, Columbia Casualty Company, Continental Casualty Company, CAN Casualty Company of California, The Continental Insurance Company, National Fire Insurance Company of Hartford, as successor-in-interest to Transcontinental Insurance Company, Transportation Insurance Company:

Pamela Dunlop Gates, Esquire

[Pamela.dunlopgates@cna.com](mailto:Pamela.dunlopgates@cna.com)

CNA Coverage Litigation Group

Plaza of the Americas

700 North Pearl Street, Suite 450

Dallas, TX 75201

(214) 220-5921

(214) 336-8229 (Remote Working Direct)

(214) 775-4124 (Fax)

Melissa A. Cornibe, Esquire

[Melissa.cornibe@cna.com](mailto:Melissa.cornibe@cna.com)

CNA Coverage Litigation Group

Three Radnor Corporate Center

100 Matsonford Road, Suite 200

Radnor, PA 19087

(610) 964-5828

Counsel for Allianz Reinsurance America, Inc.:

Sommer Ross, Esquire

[SLRoss@duanemorris.com](mailto:SLRoss@duanemorris.com)

Duane Morris LLP  
1201 North Market Street, Suite 501  
Wilmington, DE 19801  
(302) 657-4951  
(302) 657-4901 (Fax)

*Counsel for Archdiocese of New Orleans:*

Abraham J. Rein, Esq.  
[arein@postschell.com](mailto:arein@postschell.com)  
Post & Schell, P.C.  
4 Penn Center  
1600 John F. Kennedy Blvd.  
Philadelphia, PA 19103-2808  
(215) 587-1057  
(215) 587-1444 (Fax)

*Counsel for Plaintiff F.B.*

Ana Kull, Esq.  
[akull@levylaw.com](mailto:akull@levylaw.com)  
Madeleine Skaller, Esq.  
[mskaller@levylaw.com](mailto:mskaller@levylaw.com)  
Levy Konigsberg, LLP  
605 Third Ave., 33rd Fl  
New York, NY 10158  
(212) 605-6200  
(212) 605-6290 (Fax)

*Counsel for Pennsylvania Assigned Claim Plan*

Jason M. Banonis, Esq.  
[jmbanonis@mdwgc.com](mailto:jmbanonis@mdwgc.com)  
Marshall Dennehey  
620 Freedom Business Center  
Suite 300  
King of Prussia, PA 19406  
(610) 354-8250  
(610) 354-8299 (Fax)

(484)895-2338 (Direct Dial)

*Interested Non-Party*

Steven B. Davis, Esq.  
[SBDavis@duanemorris.com](mailto:SBDavis@duanemorris.com)  
Duane Morris LLP  
30 South 17<sup>th</sup> Street  
Philadelphia, PA 19103-4196  
(215) 979-1275



---

PRESTON M. BUCKMAN (I.D. #57570)  
Insurance Department Counsel  
Office of Liquidations, Rehabilitations & Special  
Funds  
Governor's Office of General Counsel  
Capital Associates Building  
901 N. Seventh Street  
Harrisburg, PA 17102  
(717) 886-2080

*Attorney for Michael Humphreys, Insurance  
Commissioner of the Commonwealth of  
Pennsylvania, in his capacity as Statutory  
Liquidator of Bedivere Insurance Company, In  
Liquidation.*

Dated: March 31, 2025