

SUPERIOR COURT OF THE DISTRICT OF COLUMBIA  
CIVIL DIVISION

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| <p>DISTRICT OF COLUMBIA,<br/>a Municipal Corporation,</p> <p>Petitioner,</p> <p>v.</p> <p>OCEAN RISK RETENTION GROUP,<br/>INC.,</p> <p>Respondent.</p> | <p>Civil Action No.: 2013 CA 006110 2<br/>Judge: Bartnoff<br/>Calendar No.: 15<br/>Next Event: Status Hearing 10/20/16</p> |
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**PRAECIPE**  
**NOTICE OF FILING OF LIQUIDATOR'S SEVENTH STATUS REPORT**

The District of Columbia, at the request and on behalf of Stephen C. Taylor, Commissioner of the District of Columbia Department of Insurance, Securities and Banking, as Liquidator of Ocean Risk Retention Group, Inc., and the Special Deputy to the Liquidator, Robert H. Myers, Jr., by and through the Office of the Attorney General for the District of Columbia, files the attached Liquidator's Seventh Status Report.

Respectfully Submitted,

KARL A. RACINE  
Attorney General for District of Columbia

ELIZABETH SARAH GERE  
Deputy Attorney General  
Public Interest Division

/s/ Eric S. Glover  
ERIC S. GLOVER [978841]  
Chief, Civil Enforcement Section

/s/ E. Louise R. Phillips  
E. LOUISE R. PHILLIPS [422074]  
Assistant Attorney General  
441 Fourth Street, NW, 630 South  
Washington, DC 20001  
tel: 202-727-0874, fax: 202-730-0658  
[louise.phillips@dc.gov](mailto:louise.phillips@dc.gov)

**CERTIFICATE OF SERVICE**

I hereby certify that on this 23<sup>rd</sup> day of September, 2016, a copy of the foregoing was filed and served by email upon:

Stephen C. Taylor, Liquidator for  
Ocean Risk Retention Group, Inc.  
c/o Stephanie Schmelz  
District of Columbia Department of Insurance,  
Securities and Banking, Office of the General Counsel  
810 First Street, NE, Suite 701  
Washington, D.C. 20002  
[Stephanie.Schmelz@dc.gov](mailto:Stephanie.Schmelz@dc.gov)

Robert H. Myers, Jr.  
Special Deputy to the Liquidator for  
Ocean Risk Retention Group, Inc.  
Morris, Manning & Martin, LLC  
1401 Eye Street, N.W.  
Washington, D.C. 20005  
[rhm@mmmlaw.com](mailto:rhm@mmmlaw.com)

/s/ E. Louise R. Phillips  
E. LOUISE R. PHILLIPS [422074]

SUPERIOR COURT OF THE DISTRICT OF COLUMBIA  
CIVIL DIVISION

DISTRICT OF COLUMBIA,  
a Municipal Corporation,

Petitioner,

v.

OCEAN RISK RETENTION GROUP,  
INC.,

Respondent.

Civil Action No.: 2013 CA 006110 2

Judge: Bartnoff

Calendar No.: 15

Next Event: Status Hearing 10/20/16

**LIQUIDATOR'S SEVENTH STATUS REPORT**

Stephen C. Taylor, Commissioner of the Department of Insurance, Securities and Banking (DISB),<sup>1</sup> as Liquidator of Ocean Risk Retention Group, Inc. (Ocean), by and through Robert H. Myers, Jr. as Special Deputy to the Liquidator (Special Deputy), respectfully submits this status report. This report provides an update on the status of Ocean's liquidation, supplementing the First Status Report filed on September 20, 2013, the Second Status Report filed on April 3, 2014, the Third Status Report filed on October 23, 2014, the Fourth Status Report filed on April 1, 2015, the Fifth Status Report filed October 28, 2015, and the Sixth Status Report filed April 4, 2016.

**I. BACKGROUND AND PROCEDURAL HISTORY**

Ocean is a captive insurer organized and licensed under the laws of the District of Columbia. Ocean operated in New Jersey and Pennsylvania as a commercial liability risk

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<sup>1</sup> On June 22, 2015, Stephen C. Taylor became DISB's Acting Commissioner and, therefore, Ocean's Liquidator since the Emergency Consent Order of Liquidation for Ocean named as Liquidator "the Commissioner and his successors in office." On November 3, 2015, Stephen C. Taylor became DISB's Commissioner.

retention group, offering liability insurance to taxi owner-operators and taxi fleet owners. The procedural history is contained in prior reports.<sup>2</sup>

## **II. ACCOUNTING, ASSETS, AND ADMINISTRATIVE EXPENSES**

Pursuant to the Liquidation Order and D.C. Official Code § 31-1319 (2012 Repl.), the title of all of Ocean's accounts has been transferred to the Commissioner as Liquidator. As detailed in prior status reports, the Liquidator has marshalled and consolidated Ocean's liquid assets into a single money market account at the Bank of Georgetown. As of June 6, 2016 Bank of Georgetown was absorbed by United Bank. As a result, Ocean's liquid assets are now at United Bank. As further detailed in Exhibit 1, income received by the Liquidator included both proceeds from subrogation claims and interest on existing funds. As of September 26, 2016 the Ocean account balance at United Bank is \$2,449,458.30.

## **III. CLAIM STATUS AND OTHER LEGAL PROCEEDINGS**

There are 665 policy holder claims under policies issued by Ocean. Pursuant to the Court's Stay Orders, all litigation against Ocean's policyholders has been stayed through December 9, 2016, as have all cases in which Ocean may have a duty to defend or indemnify its policyholders.

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<sup>2</sup> On September 6, 2013, this Court entered an Emergency Consent Order of Liquidation for Ocean (the Liquidation Order), appointing the Commissioner as Ocean's Liquidator pursuant to D.C. Official Code § 31-1316 (2012 Repl.). On September 24, 2013, the Court approved Mr. Myers appointment as Special Deputy to the Liquidator and granted the Liquidator's requested stay of, among other things, "any litigation against Ocean [and . . .] any litigation against Policyholders of Ocean in cases in which Ocean may have a duty to defend or indemnify its Policyholders." On December 9, 2013, this Court issued the requested Supplementary Order Clarifying the September 24, 2013 Order Staying and Enjoining All Litigation, explaining that the prior order does not stay, enjoin, or otherwise interfere with actions where Ocean as a plaintiff and/or claimant seeks to recover assets including, but not limited to, subrogation actions. On December 9, 2014, this Court issued an Order Extending Stay and Injunction Until December 9, 2015. On December 9, 2015, this Court issued an Order Extending Stay and Injunction until December 9, 2016.

With the court's approval, GB Group, LLC (GB Group) is handling claims administration during Ocean's liquidation. The court also approved the use of Rovner, Zimmerman & Nash, PC (Rovner) – and later approved the substitution of the Maneri Law Firm for Rovner – to pursue subrogation claims on Ocean's behalf.

The Stay Orders do not impede Ocean's ability to pursue subrogation claims, however, and the Liquidator, through outside counsel, has continued to pursue such claims on Ocean's behalf. As previously reported, prior to its withdrawal, Rovner recovered over \$26,935 (after deducting its court-approved contingent fee) for the liquidation estate. To date, the Maneri Law Firm has recovered \$11,685.79 for Ocean.

#### **IV. PROOF OF CLAIM PROCESS AND VALUATION ISSUES**

The prior status reports detailed the Special Deputy's efforts to notify policyholders and known creditors of Ocean's liquidation and of the January 31, 2014 deadline for filing proof of claims. As previously reported, the Special Deputy has 665 policyholder claims in process. Proofs of claims have also been reviewed from a total of 37 creditors of Ocean in regard to services provided but not paid for, return of premium to policyholders, and subrogation. Additionally, 130 subrogation cases have been reviewed.

The Special Deputy continues to respond to each inquiry with the assistance of GB Group and, where appropriate, adjusting claim valuations. As of September 22, 2016, the Deputy Liquidator valued the outstanding claims as follows:

**Overall Review<sup>3</sup>:**

Total Number of Claims: 899

Total Valuation: \$6,564,077.02

**Policyholder Claims:**

Number of Claims: 665

Total Valued: \$5,458,624.46

**Creditor Claims (Including Subrogation)**

Number of Claims: 167

Total Valued: \$1,213,442.16

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<sup>3</sup> The total number of claims do not equal the total of the Policyholder claims and Creditor claims because some claims include more than one claimant.

The review of claim valuations is continuing. The Deputy Liquidator's goal is to prepare a schedule of policyholder claims with a determined value, which can then be recommended for approval by the Court. *See* D.C. Official Code § 31-1341 (2012 Repl.)

Although each claim was valued at what was designed to be a reasonable settlement value, the Deputy Liquidator has responded to the requests of claimants and their counsel for higher valuation by a further review of each such claim. The Special Deputy classified each claim that called for further review as "contested".<sup>4</sup>

There are still 18 outstanding contested claims.<sup>5</sup> Of these the Special Deputy has been unable to reach a settlement with counsel for the claimant in 9 cases. Of these, 4 cases involve liability issues. The remaining 5 claims are the result of a demand by the claimant which exceeds policy limits or lacks supporting documentation. The remaining 9 cases have not been resolved because counsel and claimants cannot be contacted. Of the 9 unresponsive claims, 1 claim involves a liability issue.

## V. FUTURE ACTIONS

When the valuation issues have been resolved either by the Deputy Liquidator or the Court, the Liquidator will be in a position to petition the Court for approval of a schedule of distribution to policyholder claimants. The Special Deputy anticipates the need for a hearing date to be scheduled by the Court in order to settle the outstanding contested claims.

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<sup>4</sup> The total of number of contested claims was 93. As of September 26, 2016, the Special Deputy has resolved 75 of the contested claims.

<sup>5</sup> On September 6, 2016 the Special Deputy's office sent certified mailings to all remaining contested claims. Exhibit 2. This mailing provided claimants and counsel with a deadline of September 23, 2016 for acceptance of their current valuation.

September 30, 2016

Respectfully Submitted,



Robert H. Myers, Jr.

ROBERT H. MYERS, JR.  
Special Deputy to the Liquidator  
Morris, Manning & Martin, LLP  
1401 Eye Street NW, Suite 600  
Washington, D.C. 20005  
(p) 202-898-0011  
(f) 202-408-5146  
rmyers@mmmlaw.com

Special Deputy to the Liquidator for Ocean Risk  
Retention Group, Inc.

cc: Charlotte Parker, Esq.  
Dana Sheppard, Esq.  
Louise R. Phillips, Esq.

## Ocean RRG Accounting

| Date Posted                | Credit       | Debit       | Balance       | Purpose  |
|----------------------------|--------------|-------------|---------------|--|
| <b>United Bank Account</b> |              |             |               |  |
| 10/15/13                   |              |             |               | Account opened   |
| 10/17/13                   | \$408,272.64 |             | \$408,272.64  | Check from closed Wells Fargo account ending [REDACTED]  |
| 10/17/13/                  | \$2,024.00   |             | \$410,296.64  | Check [REDACTED] – Settlement distribution - ORRG v. New Jersey One Taxi & Limo, LLC, Docket # [REDACTED]                      |
| 10/24/13                   |              | \$52.83     | \$410,243.81  | Check order  |
| 10/25/13                   | \$321,277.46 |             | \$731,521.27  | Check [REDACTED] – from closed Provident/Cetera Investments acct ending [REDACTED]   |
| 10/31/13                   | \$103.60     |             | \$731,624.87  | Credit Interest  |
| 11/08/13                   | \$4,810.15   |             | \$736,435.02  | Check [REDACTED] – Roman of NJ Net Distribution (matter [REDACTED])  |
| 11/12/13                   |              | \$30,000.00 | \$706,435.02  | Check [REDACTED] - GB Group Initial Service Fee  |
| 11/30/13                   | \$264.94     |             | \$706,699.96  | Interest Credit  |
| 12/11/13                   | \$5,451.00   |             | \$712,150.96  | IRS Refund   |
| 12/20/13                   |              | \$2,000.00  | \$710,150.96  | Check [REDACTED] – Provident Bank – LOC ending [REDACTED]  |
| 12/20/13                   |              | \$3,000.00  | \$707,105.96  | Check [REDACTED] – Provident Bank – LOC ending [REDACTED]  |
| 12/31/13                   | \$11,870.00  |             | \$719,020.96  | Check [REDACTED] - \$5184.00 J&H Cab Co Distribution and Check [REDACTED] - \$6686.00 – Fraga, LLC t/a Metro Taxi Distribution |
| 12/31/13                   | \$270.91     |             | \$719,291.87  | Interest Credit  |
| 1/8/14                     |              | \$21,782.79 | \$697,509.08  | Check [REDACTED] – Morris, Manning & Martin, LLP   |
| 1/8/14                     |              | \$20,177.95 | \$677,3361.13 | Check [REDACTED] – Morris, Manning & Martin, LLP   |
| 1/15/14                    | \$117,859.05 |             | \$795,190.18  | Check from PNC Bank Sky Claims LLC account   |
| 1/28/14                    |              | \$16,750.00 | \$778,440.18  | Check [REDACTED] – GB Group, LLC   |
| 1/31/14                    | \$286.37     |             | \$778,726.55  | Interest Credit  |
| 2/18/14                    |              | \$12,375.00 | \$766,351.55  | Check [REDACTED] – GB Group, LLC   |
| 2/18/14                    |              | \$7,125.00  | \$759,226.55  | Check [REDACTED] – GB Group, LLC   |
| 2/28/14                    | \$266.18     |             | \$759,492.73  | Interest Credit  |

|         |                |             |                |   |
|---------|----------------|-------------|----------------|---|
| 3/4/14  |                | \$15,000.00 | \$744,492.73   | Check ██████ – DC Treasurer – Premium Tax   |
| 3/10/14 |                | \$17.00     | \$744,475.73   | Check ██████ – PNC Bank – Document Copies   |
| 3/12/14 |                | \$8,000.00  | \$736,475.73   | Check ██████ – GB Group, LLC  |
| 3/18/14 |                | \$12,375.00 | \$724,100.73   | Check ██████ – GB Group, LLC  |
| 3/27/14 | \$3,434.00     |             | \$727,534.73   | Check ██████ - Kamal Jit, Inc. Distribution   |
| 3/27/14 | \$2,000,000.00 |             | \$2,727,534.73 | Collection on outstanding letters of credit - Wire Transfer - From Fulton Bank of New Jersey                                |
| 3/31/14 | \$404.52       |             | \$2,727,939.25 | Interest Credit   |
| 4/16/14 | \$3,150.00     |             | \$2,731,089.25 | Check ██████ – Hoda A. Shaker Distribution  |
| 4/16/14 | \$1,647.00     |             | \$2,732,736.25 | Distribution check  |
| 4/30/14 | \$1,009.85     |             | \$2,733,746.10 | Interest Credit   |
| 5/2/14  |                | \$12,375.00 | \$2,721,371.10 | Check ██████ – GB Group, LLC  |
| 5/5/14  |                | \$4,720.30  | \$2,716,650.80 | Check ██████ – GB Group, LLC  |
| 5/8/14  | \$350.00       |             | \$2,717,000.80 | Check ██████ – Hoda A. Shaker Distribution  |
| 5/19/14 |                | \$3,500.00  | \$2,713,455.80 | Check ██████ – GB Group, LLC  |
| 5/19/14 |                | \$2,375.00  | \$2,713,500.80 | Check ██████ – GB Group, LLC  |
| 5/31/14 | \$1,037.83     |             | \$2,712,163.63 | Interest Credit   |
| 6/11/14 |                | \$10,481.75 | \$2,701,681.88 | Check ██████ – GB Group, LLC  |
| 6/30/14 | \$1,000.54     |             | \$2,702,682.42 | Interest Credit   |
| 7/21/14 |                | \$4,089.31  | \$2,698,593.11 | Check ██████ – GB Group, LLC  |
| 7/31/14 | \$1,032.39     |             | \$2,699,625.50 | Interest Credit   |
| 8/27/14 | \$1,444.46     |             | \$2,701,069.96 | Check ██████ - \$700.00 Hoda A. Shaker Distribution and Check ██████ - \$744.46 – Ocean v. Budget Leasing Corp Distribution |
| 8/27/14 |                | \$1,430.03  | \$2,699,639.93 | Check ██████ – Megna Law Firm   |
| 8/30/14 | \$1,031.78     |             | \$2,700,671.71 | Interest Credit   |
| 9/2/14  |                | \$8,075.90  | \$2,692,595.81 | Check ██████ – GB Group, LLC  |
| 9/4/14  |                | \$811.72    | \$2,691,784.09 | Check ██████ – Washington Times – Publication of NJ Order   |
| 9/4/14  |                | \$4,612.61  | \$2,687,171.48 | Check ██████ – Legal Intelligencer (Philadelphia) – Publication of NJ Order   |
| 9/4/14  |                | \$103.55    | \$2,687,067.52 | Check ██████ – New Jersey Law Journal – Publication of NJ Order   |
| 9/9/14  |                | \$78.41     | \$2,686,989.52 | Check ██████ – Megna Law Firm   |

|          |              |              |                |  |
|----------|--------------|--------------|----------------|--|
| 9/17/14  |              | \$3,500.00   | \$2,683,489.52 | Check █████ – GB Group, LLC  |
| 9/30/14  | \$993.53     |              | \$2,684,483.05 | Interest Credit  |
| 10/28/14 |              | \$107.63     | \$2,684,375.42 | Check █████ – New Jersey Law Journal – Publication of Stay Order                             |
| 10/29/14 |              | \$4,566.31   | \$2,679,809.11 | Check █████ – GB Group, LLC  |
| 10/31/14 | \$1,025.81   |              | \$2,680,834.92 | Interest Credit  |
| 11/03/14 |              | \$223,305.27 | \$2,457,529.65 | Check █████ - Morris, Manning & Martin, LLP  |
| 11/05/14 |              | \$86.25      | \$2,457,443.40 | Check █████ – Megna Law Firm   |
| 11/10/14 |              | \$100.00     | \$2,457,343.40 | Check █████ – Wells Fargo statement copies   |
| 11/29/14 | \$914.40     |              | \$2,458,257.80 | Interest Credit  |
| 12/03/14 | \$4,788.95   |              | \$2,463,046.75 | Close Bank of America accts ending █████ and █████ (\$3,811.90) and Bashwiner check (977.05) |
| 12/04/14 |              | \$3,500.00   | \$2,459,546.75 | Check █████ – GB Group   |
| 12/16/14 |              | \$3,500.00   | \$2,456,046.75 | Check █████ – GB Group   |
| 12/17/14 | \$338,918.68 |              | \$2,794,965.43 | Close Wells Fargo accts ending █████ and █████   |
| 12/31/14 | \$1,002.02   |              | \$2,795,967.45 | Interest Credit  |
| 1/20/15  |              | \$3,500.00   | \$2,792,467.45 | Check █████ – GB Group   |
| 1/31/15  | \$1,068.08   |              | \$2,793,535.53 | Interest Credit  |
| 2/28/15  | \$964.34     |              | \$2,794,499.87 | Interest Credit  |
| 3/2/15   |              | \$3,750.00   | \$2,790,749.87 | Check █████ – GB Group   |
| 3/3/15   |              | \$15,000.00  | \$2,775,746.87 | Check █████ – DC Treasurer – Premium Tax   |
| 3/12/15  |              | \$3,500.00   | \$2,772,249.87 | Check █████ – GB Group   |
| 3/30/15  | \$2,922.56   |              | \$2,775,172.43 | Deposit – Sime/Amboy Distribution  |
| 3/31/15  | \$1,060.49   |              | \$2,776,232.92 | Interest Credit  |
| 4/7/15   |              | \$7,332.31   | \$2,768,900.61 | Check █████ – Saslow Lufkin & Buggy – Invoice █████  |
| 4/9/15   |              | \$3,625.00   | \$2,765,275.61 | Check █████ – GB Group   |
| 4/30/15  | \$1,023.67   |              | \$2,766,299.28 | Interest Credit  |
| 5/11/15  |              | \$3,500.00   | \$2,762,799.28 | Check █████ – GB Group   |
| 5/30/15  | \$1,056.35   |              | \$2,763,855.63 | Interest Credit  |
| 6/11/15  |              | \$3,500.00   | \$2,760,355.63 | Check █████ – GB Group   |
| 6/30/15  | \$1,021.38   |              | \$2,761,377.01 | Interest Credit  |
| 7/9/15   | \$83.22      |              | \$2,761,460.23 | Deposit – Jenail Leslie Distribution   |
| 7/9/15   |              | \$3,500.00   | \$2,757,960.23 | Check █████ – GB Group   |

|           |             |              |                |  |
|-----------|-------------|--------------|----------------|--|
| 7/29/15   | \$2,110.15  |              | \$2,760,070.38 | Deposit – Teodoro Martinezz dba Go US Cab and Transport – Distribution |
| 7/31/15   | \$1,054.48  |              | \$2,761,124.86 | Interest Credit  |
| 8/20/15   |             | \$3,500.00   | \$2,757,624.86 | Check [REDACTED] – GB Group  |
| 8/31/15   | \$1,054.76  |              | \$2,758,679.62 | Interest Credit  |
| 9/9/15    | \$36,293.78 |              | \$2,794,973.40 | Deposit – New Jersey Tax Refund  |
| 9/11/15   |             | \$3,500.00   | \$2,791,473.40 | Check [REDACTED] – GB Group  |
| 9/15/15   | \$186.55    |              | \$2,791,661.95 | Deposit - Jenail Leslie Distribution                                   |
| 9/22/15   | \$1,472.95  |              | \$2,793,134.90 | Deposit – C & K Distribution   |
| 9/23/15   |             | \$59.56      | \$2,793,075.34 | Check order – Harland  |
| 9/30/15   | \$1,029.51  |              | \$2,794,104.85 | Interest Credit  |
| 10/19/15  |             | \$3,500.00   | \$2,790,604.85 | Check [REDACTED] – GB Group  |
| 10/31/15  | \$1,067.32  |              | \$2,791,672.17 | Interest Credit  |
| 11/09/15  |             | \$3,500.00   | \$2,788,172.17 | Check [REDACTED] – GB Group  |
| 11/12/15  | \$182.52    |              | \$2,788,354.69 | Maneri Deposit – ORR v. Leslie Payment                                 |
| 11/30/15  | \$1,031.63  |              | \$2,789,386.36 | Credit Interest  |
| 12/18/15  | \$143.30    |              | \$2,789,529.62 | Deposit – Fee for # [REDACTED]   |
| 12/31/15  | \$1,066.11  |              | \$2,790,595.73 | Credit Interest  |
| 1/6/16    | \$127.04    |              | \$2,790,722.77 | Maneri Deposit – ORR v. Leslie # [REDACTED]                            |
| 1/6/16    |             | \$3,500      | \$2,787,222.77 | Check [REDACTED] – GB Group  |
| 1/22/16   |             | \$236,460.88 | \$2,550,761.89 | Check [REDACTED] – Morris Manning & Martin, LLP                        |
| 1/30/2016 | \$1,033.48  |              | \$2,551,795.37 | Credit Interest  |
| 2/02/2016 | \$210.28    |              | \$2,552,005.65 | Deposit – [REDACTED] Maneri LLC Claim # [REDACTED]                     |
| 2/16/2016 |             | \$3,500.00   | \$2,548,505.65 | Check [REDACTED] – GB Group  |
| 2/16/2016 |             | \$3,500.00   | \$2,545,005.65 | Check [REDACTED] – GB Group  |
| 2/17/2016 |             | \$15,000.00  | \$2,530,005.65 | Check [REDACTED] - 2015 Premium Tax Return                             |
| 2/29/2016 | \$906.33    |              | \$2,530,911.98 | Credit Interest  |
| 3/31/2016 | \$964.68    |              | \$2,531,876.63 | Credit Interest  |
| 4/01/2016 | \$90.16     |              | \$2,531,966.79 | Deposit – Maneri LLC Claim # [REDACTED]                                |
| 4/06/2016 | \$131.26    |              | \$2,532,098.05 | Deposit – Maneri LLC Claim # [REDACTED]                                |
| 4/13/2016 |             | \$38.05      | \$2,532,060.00 | Check Order – Billing (Deposit Slips)                                  |
| 4/13/2016 |             | \$7,250.00   | \$2,524,810.00 | Check [REDACTED] – GB Group  |
| 4/26/2016 | \$1,632.44  |              | \$2,526,442.44 | Deposit – Maneri LLC Claim #   |

|              |          |             |                | ██████████ & # ██████████   |
|--------------|----------|-------------|----------------|---|
| 4/30/2016    | \$932.45 |             | \$2,527,374.89 | Credit Interest   |
| 5/09/2016    |          | \$3,500     | \$2,523,874.89 | Check ██████████ – GB Group   |
| 5/31/2016    | \$962.31 |             | \$2,524,837.20 | Credit Interest   |
| 6/03/2016    | \$93.13  |             | \$2,524,930.33 | Credit Interest   |
| 6/13/2016    |          | \$3,500     | \$2,521,430.33 | Check ██████████ – GB Group   |
| 6/30/2016    | \$837.42 |             | \$2,522,267.75 | Credit Interest   |
| 7/05/2016    | \$133.33 |             | \$2,522,401.08 | Deposit – Maneri LLC ██████████   |
| 7/13/2016    |          | \$3,500     | \$2,518,901.08 | Check ██████████ – GB Group   |
| 7/15/2016    |          | \$5,300     | \$2,513,601.08 | Check ██████████ – Saslow Lufkin & Buggy, LLP Invoice 26075               |
| 7/21/2016    | \$161.05 |             | \$2,513,762.13 | Deposit- Maneri LLC ██████████  |
| 7/29/2016    | \$959.50 |             | \$2,514,721.63 | Credit Interest   |
| 8/04/2016    | \$140.25 |             | \$2,514,861.88 | Deposit – Maneri LLC ██████████   |
| 8/05/2016    |          | \$63,048.93 | \$2,451,812.95 | Check ██████████ – Morris Manning and Martin Fourth Order of Distribution |
| 8/12/2016    |          | \$3,500     | \$2,448,312.95 | Check ██████████ – GB Group   |
| 8/30/2016    | \$208.62 |             | \$2,448,521.57 | Deposit – Maneri LLC Claim # ██████████                                   |
| 8/31/2016    | \$936.73 |             | \$2,449,458.30 | Credit Interest   |
| <b>Total</b> |          |             |                |   |
| 06/04/2016   |          |             | \$2,449,458.30 |   |

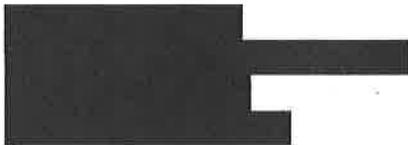


Exhibit 2

Robert H. Myers, Jr.  
202-898-0011  
rhm@mmmlaw.com  
www.mmmlaw.com

September 6, 2016

VIA USPS CERTIFIED MAIL



**Re: Ocean Risk Retention Group – Valuation Objection Notice**  
**Claimant:** [REDACTED]

Dear [REDACTED]:

I am the Special Deputy for the Liquidator of Ocean Risk Retention Group, in Liquidation (“Ocean”). Your claim (referenced above) is listed as one of those where an objection to the valuation has been filed.

I understand that Ocean’s claims settlement agent, Gene Brodsky, has been in contact with you regarding your claim.

In your case, an increase in the valuation has been offered. If you wish to accept the current valuation, please provide a written acceptance to this office by 6:00 PM on September 23, 2016. If we do not receive any writing from you to that effect, we will proceed on the assumption that you have not accepted our proposal and you wish to continue your objection.

Each claimant who has objected to the valuation of his or her claim will be notified of the opportunity to present to the Superior Court of the District of Columbia (the “Court”) the evidence supporting that claim. The date and time for such a presentation will be determined by the Court.

Should you have any further questions, please forward to the undersigned in writing.

Very truly yours,

Robert H. Myers, Jr.  
Special Deputy Liquidator.