

VERMONT SUPERIOR COURT
WASHINGTON UNIT

CIVIL DIVISION
DOCKET s-444-83 Wnc

In the matter of)
)
AMBASSADOR INSURANCE COMPANY)
)

LIQUIDATOR’S MOTION FOR ESTABLISHMENT OF A FINAL CLAIM DATE FOR
AMBASSADOR INSURANCE COMPANY

Stephen W. Kimbell, Commissioner of the Vermont Department of Financial Regulation and solely in his capacity as Liquidator (Liquidator) of the Ambassador Insurance Company (Ambassador), hereby requests an order from this Court establishing a date after which no new claims or amendments to or developments on existing claims will be accepted by the Liquidator. This request, if granted, would allow the Liquidator to begin the process of winding-up the estate of Ambassador and end this docket which has been pending before this Court since 1983.

Specifically, the Liquidator requests:

1. That the Court establish a date 90 days following entry of the order granting the relief sought in this Motion as the last date (“Final Claim Date”) on which the holder of a claim which remains unliquidated or unadjudicated, but for which the claimant timely filed a proof of claim against Ambassador, may file an amendment to that proof of claim, including any evidence or relevant documentation (“Claim Amendment”), to support the claim;
2. That the Court apply the Final Claim Date to all claims against the estate of Ambassador, including, but not limited to, all pending, future, unknown, unliquidated, contingent, and undetermined claims as well as to claims that were permitted to be filed to reserve the rights of policyholders without knowledge of potential claims (this latter class of claims will hereinafter be referred to as “Policyholder Protection” claims);

3. That the Court prohibit the Liquidator from accepting any further evidence or documentation relating to a pending or potential claim against Ambassador after the Final Claim Date;
4. That the Court approve the form and manner of notice to be given Ambassador's Claimants and other interested parties regarding the Final Claim Date;
5. That, once adjudication of all claims pending or amended by the Final Claim Date is complete, the Liquidator be permitted to make recommendations to the Court on the final distribution of any remaining funds of the Estate and to propose a plan to close the estate; and,
6. That the Court award other related relief as the Court determines is just.

Dated at Montpelier, Vermont, this 15th day of June, 2012.

Stephen W. Kimbell,
Commissioner of the Vermont Department of
Financial Regulation, in his capacity as Liquidator
for Ambassador Insurance Company

BY:



Clifford J. Peterson, Esq.
General Counsel of the Vermont Department of
Financial Regulation, in his capacity as Counsel for
the Liquidator for Ambassador Insurance Company

And

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