

Court entered an Order Approving the Revised Claims Evaluation Plan and established the claims filing bar date of April 7, 2014.

4. Pursuant to OKLA. STAT. tit. 36, § 1930, the Receiver took all reasonable efforts to determine the identity of all persons who may have claims against PNIC and to provide them with notice to allow them the opportunity to file a claim before the April 7, 2014 claims bar date.

5. The Receiver distributed 20,729 notices of liquidation to potential claimants. Additionally, notice of the proof of claim process and the availability of the proof of claim packets was published on the Oklahoma Receivership Office website.

6. On December 20, 2013, the Court entered an Order Extending the Claims Filing, Claims Reporting and Evaluation Plan Deadlines establishing June 6, 2014 as the date by which the Receiver must file his Report of Timely Filed Claims.

7. On June 5, 2014, the Receiver filed the Receiver's Report on Timely Filed Claims. The Receiver's report stated that 814 timely proofs of claim and 19 untimely proofs of claims were filed with the Receiver. In addition, various States' Guaranty Associations have claims which amounts are currently undetermined.

8. This Court has previously approved the Receiver's recommendation on all claims presented in the prior fourteen Receiver's Reports on Claim Evaluation and Request for Confirmation of Receiver's Recommendation adjudicating a total of 652 claims totaling in excess of \$10,683,951.57.

9. The Assistant Receiver informs the Court that 35 Class 3 claims are ready for adjudication at this time. Pursuant to 36 O.S. § 1927.1, Class 3, is "All claims under policies including claims of the federal or any state or local, government for losses incurred ("loss claims") including third party claims, claims for unearned premium, all claims of a guaranty

association for payment of covered claims or covered obligations of the insurer and all claims of a guaranty association for reasonable expenses other than those included in Class 2. All claims under life and health insurance and annuity policies, whether for death proceeds, health benefits, annuity proceeds or investment values shall be treated as loss claims. That portion of any loss, indemnification for which is provided by other benefits or advantages recovered by the claimant, shall not be included in this class, other than benefits or advantages recovered or recoverable in discharge of familial obligations of support or by way of succession at death or as proceeds of life insurance, or as gratuities". Class 6 includes general creditor claims and claims for subrogation.

10. There remain a total of 118 un-adjudicated claims. The remaining claims include 18 class 3 and 100 class 6 claims. Thirteen of the eighteen remaining Class 3 proof of claims are from state guaranty associations which will be included in a final order regarding the Estate. There are four Class 3 proof of claims that are still being adjusted by state guaranty associations. Once those are fully adjusted by the guaranty associations, they will be included in a future report. One Class 3 proof of claim has been reviewed by a third party adjuster, is under review by the Receiver and will be included in a future report. The remaining Class 6 proof of claims will not be further reviewed as PNIC will not have sufficient funds to pay claims beyond Class 3. The final report to the Court will include the remaining Class 6 proof of claims and any late-filed proof of claims.

11. The Assistant Receiver has not completed marshalling all of PNIC's assets. Therefore, this Report does not address the actual distribution of assets that may ultimately be made to creditors and beneficiaries of PNIC. The amount distributed to a creditor on its claim

will likely be less than the "recommended allowed" amount due to anticipated insufficiency of funds in the PNIC estate.

EXPLANATION OF RECEIVER'S RECOMMENDATION

12. Attached hereto as Exhibit 1 and Exhibit 2 are reports detailing the Receiver's recommendation on the 35 Class 3 claims that are ready for adjudication. Exhibit 1 details the Class 3 claim that the Receiver is recommending a partial allowance. Exhibit 2 is a report on the 34 class 3 claims that the Receiver is recommending denial. The table below is a summary of the Receiver's recommendations with respect to the claims that are ready for adjudication:

Class	Amount Claimed	Recommended Allowance	Recommended Denial
3	\$2,175,701.51	\$489.99	\$2,175,211.52

13. The Receiver has analyzed the claims reflected on Exhibit 1 and Exhibit 2 and recommends that each of the claims classified as a Class 3 claim for purposes of OKLA. STAT. tit. 36, § 1927.1 as indicated on attached Exhibit 1 and Exhibit 2.

14. The "Amount Claimed" column on Exhibits 1 and 2 reflects the amount that the Class 3 claimant has sought through the particular claim. The "Amount Allowed" column sets forth the amount the Receiver recommends that the Court allow as to the particular claim.

15. The Receiver has recommended the partial allowance of one claim as shown on Exhibit 1 and the denial of the 34 claims as shown on Exhibit 2. The claims that are denied is because either: the claim has been paid in full by the applicable State Guaranty Association or other insurance or that the claimant has abandoned the claim.

16. The Proof of Claim form filed by each claimant contains the following language in bold type: "If you have a change of address, you are required to inform the receiver of the

new address in order to receive any payment that might be due." To the extent any Notice of this proceeding is returned undeliverable, the Receiver asks the Court to find that the due process rights of the claimant have not been impaired and to order the denial of their claim without further attempts to give actual notice.

17. In compliance with the due process required by 36 O.S. § 1918, the Receiver asks the court to set a hearing on the claims and establish a date certain for filing an objection to the Receiver's recommendation.

18. The recommended denial by the Receiver of any timely filed proof of claim included in the Receiver's Fifteenth Report does not alter the statutory obligation, if any, of the Oklahoma Property & Casualty Insurance Guaranty Association or similar associations in other states, to provide indemnity and defense of a "covered claim" as defined by each association's applicable state law.

WHEREFORE, the Receiver prays that this Court enter an Order for the following: 1) order that notice of opportunity to object and be heard on the claims on the Exhibit be given by the Receiver; 2) establish a date for filing an objection to the recommendation of the Receiver; 3) establish a date for hearing the Receiver's recommendation to the court and any objections thereto; 4) upon hearing any objections thereto, enter an order approving the Receiver's Report; and 5) such other relief as the Court deems appropriate.

Respectfully submitted,

RIGGS, ABNEY, NEAL, TURPEN,
ORBISON & LEWIS



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ATTORNEYS FOR RECEIVER

CERTIFICATE OF MAILING

I, hereby certify that on this 1st day of September, 2021, I caused to be mailed a true and correct copy of the within and foregoing instrument to:

President
Pride Holdings, Inc.
5200 Maryland Way, Suite 204
Brentwood, TN 37027

J. Angela Ables
Kerr, Irvine, Rhodes & Ables, P.C.
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General Counsel
Oklahoma Insurance Department
400 NE 50th Street
Oklahoma City, OK 73105

Oklahoma Property & Casualty
Insurance Guaranty Association
2601 NW Expressway, Suite 330E
Oklahoma City, OK 73112


George M. Emerson

Claims Allowed By Class

Claim Class: 3

POC #	Amount Claimed	Amount Allowed	Timely Filed?
1421	\$1,011.99	\$489.99	<u>Yes</u>
Class 3 Totals:	\$1,011.99	\$489.99	
Total Claims:	\$1,011.99	\$489.99	

Claims Allowed By Class

Claim Class: 3

POC #	Amount Claimed	Amount Allowed	
1138	\$100,000.00	\$0.00	Timely Filed? <u>Yes</u>
1155	\$0.00	\$0.00	Timely Filed? <u>Yes</u>
1184	\$0.00	\$0.00	Timely Filed? <u>Yes</u>
1225	\$220,218.70	\$0.00	Timely Filed? <u>Yes</u>
1232	\$100,000.00	\$0.00	Timely Filed? <u>Yes</u>
1265	\$500.00	\$0.00	Timely Filed? <u>Yes</u>
1273	\$4,235.51	\$0.00	Timely Filed? <u>Yes</u>
1385	\$0.00	\$0.00	Timely Filed? <u>Yes</u>
1392	\$25,000.00	\$0.00	Timely Filed? <u>Yes</u>
1448	\$50,000.00	\$0.00	Timely Filed? <u>Yes</u>
1464	\$72,179.61	\$0.00	Timely Filed? <u>Yes</u>
1468	\$25,000.00	\$0.00	Timely Filed? <u>Yes</u>
1487	\$7,789.04	\$0.00	Timely Filed? <u>Yes</u>
1576	\$20,000.00	\$0.00	Timely Filed? <u>Yes</u>
1578	\$3,387.21	\$0.00	Timely Filed? <u>Yes</u>
1632	\$0.00	\$0.00	Timely Filed? <u>Yes</u>
1635	\$0.00	\$0.00	Timely Filed? <u>Yes</u>
1637	\$750,000.00	\$0.00	Timely Filed? <u>Yes</u>
1665	\$47,500.00	\$0.00	Timely Filed? <u>Yes</u>
1666	\$0.00	\$0.00	Timely Filed? <u>Yes</u>
1678	\$25,000.00	\$0.00	Timely Filed? <u>Yes</u>
1679	\$25,000.00	\$0.00	Timely Filed? <u>Yes</u>
1685	\$10,000.00	\$0.00	Timely Filed? <u>Yes</u>
1700	\$0.00	\$0.00	Timely Filed? <u>Yes</u>
1711	\$10,000.00	\$0.00	Timely Filed? <u>Yes</u>
1713	\$27,846.13	\$0.00	Timely Filed? <u>Yes</u>
1715	\$299,899.24	\$0.00	Timely Filed? <u>Yes</u>
1721	\$200,000.00	\$0.00	Timely Filed? <u>Yes</u>
1744	\$90,132.13	\$0.00	Timely Filed? <u>Yes</u>
1759	\$25,000.00	\$0.00	Timely Filed? <u>Yes</u>
1760	\$25,000.00	\$0.00	Timely Filed? <u>Yes</u>
1765	\$9,542.79	\$0.00	Timely Filed? <u>Yes</u>

Claim Class: 3

POC #	Amount Claimed	Amount Allowed	
1773	\$1,459.16	\$0.00	Timely Filed? <u>Yes</u>
1798	\$0.00	\$0.00	Timely Filed? <u>Yes</u>
Class 3 Totals:	\$2,174,689.52	\$0.00	
Total Claims:	\$2,174,689.52	\$0.00	