

## IMPORTANT LEGAL NOTICE

TO: Policyholders, Subscribers, Creditors, and Other Persons Interested in the Affairs of Reciprocal of America (“ROA”) and the Reciprocal Group (“TRG”) (collectively, the “Companies”)

Please take notice that Alfred W. Gross, Commissioner of Insurance, State Corporation Commission of Virginia (the “Commission”), in his role as Deputy Receiver of the Companies (the “Deputy Receiver”), has applied (the “Application”) for the Commission’s approval of his settlement of certain claims with General Reinsurance Corporation (“General Re”), Milliman, Inc. (“Milliman”), PricewaterhouseCoopers LLP (“PwC”) and certain of their officers, employees, and principals (the “General Re-Milliman-PwC Settlement”), his settlement of certain claims against Wachovia Bank, National Association (“Wachovia”) (the “Wachovia Settlement”), and his settlement of certain claims with the Missouri Hospital Plan, the Hospital Services Group, Healthcare Services Association, Providers Insurance Consultants, and Medical Liability Alliance (collectively, “MHP”) (the “MHP Settlement”) (collectively, the “Settlements”). In exchange for the Deputy Receiver dismissing and releasing his claims against the General Re, Milliman, PwC, and Wachovia defendants, and obtaining MHP’s dismissal and release of those same defendants, upon satisfaction of all conditions precedent to the Settlements, including the Commission’s requested approval, the Deputy Receiver estimates that, in the aggregate, this would result in approximately a \$500 million net improvement to the receivership estate, in the form of withdrawal from the receivership of proofs of claims by certain parties, including MHP, General Re’s payment of reinsurance claims, and cash payments by the General Re, Milliman, PwC, and Wachovia defendants. The Deputy Receiver has determined that it is in the best interests of the Companies’ policyholders and creditors that he consummate the Settlements according to their terms.

## **CONTINGENT HEARING**

By Order dated October 6, 2009, in Case No. INS-2009-00212, the Commission scheduled a contingent hearing for consideration of the Deputy Receiver’s request for approval of the Settlements, as described in the Application, for December 16, 2009, at 10 a.m., in the Second Floor Courtroom, State Corporation Commission, Tyler Building, 1300 East Main Street, Richmond, Virginia, said hearing to be held only in the event that written opposition to the respective settlement is timely filed. The order requires that all persons objecting to any of the three settlements file with the Commission and provide copies to the Deputy Receiver and counsel for the Deputy Receiver, no later than **30 days** before the scheduled date of the contingent hearing, a Notice of Objection, which shall contain: (i) a precise statement of the interest of the respondent; (ii) a statement of the specific relief sought, to the extent then known; and (iii) the factual and legal basis for the relief sought.

All Notices of Objection and all other pleadings or related documents shall be filed with the Commission electronically in the manner prescribed by the Commission’s Guidelines for Electronic Document Filing, <http://scc.virginia.gov/clk/efiling/Guidlines.aspx>, or by delivering the original and fifteen (15) copies to the Clerk of the Commission, State Corporation

Commission, c/o Document Control Center, P.O. Box 2118, Richmond, Virginia 23218-2118. Service on the Deputy Receiver shall be made by delivering one complete copy of any required filing to counsel for the Deputy Receiver, Patrick H. Cantilo, 11401 Century Oaks Terrace, Suite 300, Austin, Texas 78758, and electronically to [service@cb-firm.com](mailto:service@cb-firm.com), on or before the date required for filing with the Commission.

Copies of the Application and the above-referenced Commission order may be obtained at <http://www.reciprocalgroup.com> and <http://docket.scc.virginia.gov/vaprod/main.asp> or, for those who do not have computer access, by contacting the Companies at Reciprocal of America, in Receivership, 4200 Innslake Drive, Suite 102, Glen Allen, Virginia 23060, telephone (800) 284-8847.