

SCHEDULE ONE

IN THE MATTER OF THE REHABILITATION OF LION INSURANCE COMPANY

New York Supreme Court, Index No.: 405446/07

NOTICE

By order of the Supreme Court of the State of New York, County of New York (the "Court"), entered September 6, 2007 (the "Rehabilitation Order"), Lion Insurance Company ("Lion") was placed into rehabilitation and the Superintendent of Insurance of the State of New York was appointed Rehabilitator (the "Rehabilitator"). The Rehabilitator hereby gives notice that he has applied to the Court by order to show cause for an order: (i) establishing December 1, 2010 as the bar date ("Bar Date") for presentment of all claims to the Rehabilitator other than claims for administrative costs and expenses ("Claims"); (ii) establishing the Bar Date as the last date on which a claimant who has previously presented a timely Claim against Lion arising under New York Insurance Law ("Insurance Law") Article 51 ("No-Fault Claim"), may submit an amendment to such No-Fault Claim, including any evidence or other relevant documents or materials ("No-Fault Claim Amendment"); (iii) barring and discharging all Claims, including No-Fault Claims and No-Fault Claim Amendments, submitted after the Bar Date; (iv) barring and discharging as of the Bar Date all No Fault-Claims and No-Fault Claim Amendments unless the claimant has submitted sufficient evidence that the No-Fault Claim or No-Fault Claim Amendment was previously reported to Lion within the periods prescribed for submitting such No-Fault Claim or No-Fault Claim Amendment by the New York Insurance Department No-Fault Regulation 68-A, 11 N.Y.C.R.R. 65-1.1, ("Regulation 68"); (v) directing that the submission of Claims, No-Fault Claims and No-Fault Claim Amendments must be made in writing and sent by first class mail, postage paid and postmarked on or before the Bar Date, or by overnight courier, fees paid and written acknowledgement of receipt by such courier, on or before the Bar Date, to the Rehabilitator at the following address:

Superintendent of Insurance of the State of New York
as Rehabilitator of Lion Insurance Company
123 William Street
New York, New York 10038-3889
Attn: Estate Management, Gail Pierce-Siponen, Director

(f) establishing the form and manner by which notice of the Bar Date shall be given to Lion's claimants, creditors and all other interested parties; and (g) granting such other relief as is just;

A hearing is scheduled on the order to show cause on November 4, 2010 at the Courthouse, 60 Centre Street, New York, New York, IAS 10, Room 232, at 9:30 a.m. (the "Return Date"). If you wish to object to the Petition, you must serve your objections and all supporting documentation ("Answering Papers") upon the Rehabilitator so as to be received by the Rehabilitator at least seven business days prior to the Return Date. Service of Answering Papers on the Rehabilitator shall be made by first class mail at the following address:

Superintendent of Insurance of the State of New York
as Rehabilitator of Lion Insurance Company
123 William Street

New York, New York 10038
Attn: John Pearson Kelly, General Counsel

The order to show cause and supporting papers are available for inspection at office of the New York Liquidation Bureau at 123 William Street, New York, New York and on the internet web page maintained by the New York Liquidation Bureau at <http://www.nylb.org>. Requests for further information should be directed to John Pearson Kelly, General Counsel at 212-341-6400.

New York, New York
Dated: July 23, 2010

JAMES J. WRYNN
Superintendent of Insurance
of the State of New York as Rehabilitator
of Lion Insurance Company