

COPY

IN THE CIRCUIT COURT OF THE
SECOND JUDICIAL CIRCUIT, IN
AND FOR LEON COUNTY, FLORIDA

In Re: The Receivership of
VANGUARD FIRE AND CASUALTY
COMPANY, a Florida corporation.

CASE NO.: 2007-CA-186

RECEIVER'S MOTION TO EXTEND DEADLINE FOR FILING CLAIMS

The Florida Department of Financial Services, as Receiver of Vanguard Fire and Casualty Company ("Receiver"), hereby moves for an extension of the deadline for filing claims on the following grounds:

1. On March 26, 2007, this Court entered an Order Appointing the Florida Department of Financial Services as Receiver of Vanguard Fire and Casualty Company ("Vanguard"), for Purposes of Liquidation, Injunction, and Notice of Automatic Stay.
2. Paragraph "15 (AA)" of the Liquidation Order provides that all claims shall be filed with the Receiver on or before March 26, 2008, or be forever barred and that all claims must be filed on proof of claim forms prepared by the Receiver.
3. The Receiver will mail proof of claims forms to all known potential claimants who were identified as having contracts with Vanguard.
4. In order to file a claim, potential claimants must fill out the proof of claim form and submit it to the Receiver by the claims filing deadline of March 26, 2008.
5. The Receiver has begun utilizing a "Claim-Net" technology system in order to more efficiently process claims. Instead of submitting a tangible proof of claim form via U.S. Mail, claimants are able to file a claim and any subsequent objections through the web based "Claim-Net" system.

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6. Due to the complexities of the Vanguard data, the Receiver will need additional time to coordinate the data within the "Claim-Net" system. The Receiver therefore suggests that the claims filing deadline of March 26, 2008, be extended to June 30, 2008. An extension of the claims filing deadline, which will allow the complete and accurate input of data into the claims filing system, is in the best interest of the policyholders and creditors of Vanguard.

7. Section 631.021(1), Florida Statutes, states that any delinquency proceeding in this chapter is in equity.

8. The equitable relief requested is consistent with the general purpose of Chapter 631, Florida Statutes, which is the protection of the interests of policyholders, creditors and other claimants and the public. *See Section 631.001(3) (a), Florida Statutes.*

9. This Court has jurisdiction to grant the relief requested in that Section 631.021(1), Florida Statutes, provides that this Court is authorized to make all necessary or proper orders to carry out the purposes of this chapter.

WHEREFORE, the Receiver respectfully requests this Court enter an Order extending the deadline for filing claims to June 30, 2008.

DATED this 23 day of January, 2008.



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