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## MEMORANDUM

**To** TO ALL PARTIES SEEKING TO SUBPOENA BUSINESS RECORDS FROM GOLDEN EAGLE INSURANCE COMPANY IN LIQUIDATION

**FROM** Thomas J. Welsh  
Orrick, Herrington & Sutcliffe LLP  
Attorneys for the California Insurance Commissioner,  
in his capacity as Statutory Liquidator of Golden Eagle Insurance Company

**DATE** June 21, 2010

**RE** *In re Golden Eagle Insurance Company in Liquidation* (SF Superior Court Case No. 984502)  
**NOTICE OF INJUNCTION AGAINST THE ISSUANCE OF SUBPOENAS & INSTRUCTIONS FOR OBTAINING BUSINESS RECORDS**

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### NOTICE OF INJUNCTION REGARDING SUBPOENAS TO GOLDEN EAGLE

**PLEASE TAKE NOTICE** that the service of subpoenas for business records and the service of any other legal process related to the assets and records of Golden Eagle Insurance Company in Liquidation (“Golden Eagle”)<sup>1</sup> is enjoined by Order of the San Francisco Superior Court. The Court’s injunction requires that any person or entity seeking to initiate any action or legal proceeding against Golden Eagle or its assets and records must first obtain approval of the San Francisco Superior Court, or the consent of the Commissioner.

### INSTRUCTIONS FOR OBTAINING CLAIM FILES AND OTHER BUSINESS RECORDS FROM GOLDEN EAGLE

Notwithstanding the injunction described above, the Commissioner desires to assist parties in efficiently obtaining copies of Golden Eagle business records that are necessary to the resolution of unrelated litigation, without the need for motion practice or the issuance of subpoenas.

Any party seeking copies of Golden Eagle claims files may contact the Claims Administrator, GE Corporation, at the following address to request copies of the records sought in the Subpoena:

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<sup>1</sup> Golden Eagle, a liquidating insurance company that was placed into receivership by the Insurance Commissioner on January 31, 1997, should not be confused with Golden Eagle Insurance *Corporation*, a wholly owned subsidiary of Liberty Mutual Insurance Company (“GE Corporation”). GE Corporation acquired certain assets and liabilities from Golden Eagle in 1997, and was appointed as the Claims Administrator for insurance claims under pre-1997 Golden Eagle policies.



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Renee Wright  
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Telephone: (619) 744-6000 (Main)  
Direct (619) 744-6335  
Fax: (619) 744-6111  
Email: [renee.wright@libertymutual.com](mailto:renee.wright@libertymutual.com)

The Claims Administrator will advise you if the requested claims files or records remain available, and will provide copies and business records affidavits. Parties requesting records must reimburse GE Corporation for any actual and reasonable out of pocket costs of producing and copying requested records.

Very truly yours,

A handwritten signature in black ink that reads "Thomas J. Welsh". The signature is written in a cursive style with a large, sweeping initial "T".

Thomas J. Welsh