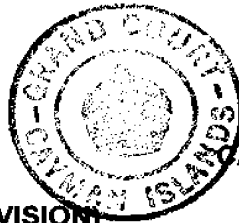


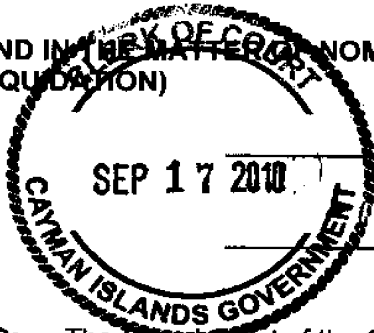
IN THE GRAND COURT OF THE CAYMAN ISLANDS  
FINANCIAL SERVICES DIVISION



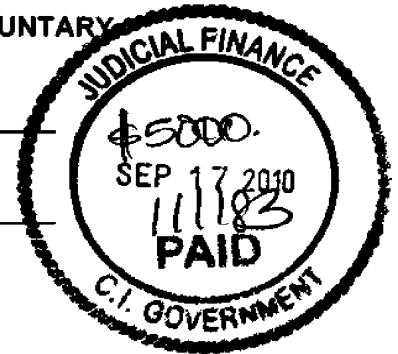
FSD 0208  
CAUSE NO. OF 2010

IN THE MATTER OF THE COMPANIES LAW (2010 REVISION)

AND IN THE MATTER OF NOMC INSURANCE COMPANY, LTD. (IN VOLUNTARY LIQUIDATION)



PETITION



TO: The Grand Court of the Cayman Islands

The humble Petition of Kenneth Krys and Margot MacInnis of Krys & Associates Cayman Ltd, Governors Square, 23 Lime Tree Bay Avenue, Grand Cayman KY1-1205, Cayman Islands as Joint Voluntary Liquidators (the "JVLs") of NOMC Insurance Company, Ltd (the "Company") shows that:

- 1 The purpose of this Petition is to seek an order that the voluntary liquidation of the Company continue under the supervision of this Honourable Court pursuant to Section 124(1) of the Companies Law (2010 Revision) (the "Law") and CWR O.15r.1(1).
- 2 The Company was incorporated in the Cayman Islands as an exempted limited liability company, with Registration No. 66450, on 3 June, 1996 under the then revision of the Companies Law.
- 3 The Company's registered office is at Krys & Associates Cayman Ltd, Governors Square, 23 Lime Tree Bay Avenue, Grand Cayman, KY1-1205, Cayman Islands. Prior to the appointment of the JVLs, the registered office of the Company was at 68 West Bay Road, Grand Cayman, KY1-1102, Cayman Islands.
- 4 The objects for which the Company was established are unlimited. Since incorporation the Company has carried on the business of a captive insurance company. The Company was granted an unrestricted Class "B" Insurer's License with effect from 27 August, 1996, which it holds subject to the provisions of the Insurance Law of the Cayman Islands.

5 Pontiac General Hospital and Medical Center, Inc. (DBA/North Oakland Medical Center) ("NOMC") of 461 West Huron Street, Pontiac, Michigan 48341 is the sole shareholder of the Company. By a written resolution of the sole shareholder on 1 September 2010, it was resolved that the Company be placed into voluntary liquidation and that the JVLs be appointed to act joint and severally.

6 The JVLs have consented to act as joint and several voluntary liquidators of the Company by way of their written consent addressed to the Company dated 1 September 2010, which was filed with the Cayman Islands Companies Registrar on 1 September 2010, together with notice of the appointment of the JVLs.

7 The sole director of the Company is Michael DeRubeis.

8 From the following information that is available at this time, the JVLs believe the Company is of doubtful solvency:

8.1 The director of the Company has confirmed to the JVLs that he will not sign a declaration of solvency as prescribed by Section 124 of the Law;

8.2 To the best of the JVLs' knowledge, prior to the liquidation, the Company's principal activity was the issuance of insurance policies for NOMC, its corporate subsidiaries and affiliates and their employees. The Company has contingent liabilities under a number of policies that are still outstanding and pursuant to which the policy holders are insured for an indefinite period of time;

8.3 The Company currently holds approximately US\$340,000 in cash. The JVLs have been informed by the Company's administrator that the actuarial estimate of liability associated with the exposure under outstanding policies as at 30 April 2010 and adjusted for claims paid through 31 July 2010 is approximately \$365,000; and

8.4 NOMC filed for bankruptcy in the United States on 26 August 2008 pursuant to Chapter 11 of the United States Bankruptcy Code.

9 The JVLs therefore respectfully request orders of the Court pursuant to Section 124(1) of the Law that the liquidation of the Company continue under the supervision of the Court, and that

Kenneth Kryz and Margot MacInnis be appointed as Joint Official Liquidators of the Company (the "JOLs").

10 In this regard, Kenneth Kryz and Margot MacInnis:

- 10.1 are qualified insolvency practitioners in the Cayman Islands and meet the residence requirement contained in Regulation 5 of the Insolvency Practitioners' Regulations;
- 10.2 meet the independence requirement prescribed by Regulation 6 of the Insolvency Practitioners' Regulations;
- 10.3 confirm that Kryz & Associates Cayman Ltd is in compliance with the insurance requirement prescribed by Regulation 7 of the Insolvency Practitioners' Regulations; and
- 10.4 confirm that they consent to act as JOLs of the Company, if so appointed by the Court.

**The Petitioners therefore pray that:**

- (1) The liquidation of the Company be continued under the supervision of the Court.
- (2) Kenneth Kryz and Margot MacInnis of Kryz & Associates Cayman Ltd be appointed as JOLs of the Company with power to act jointly and severally.
- (3) The JOLs shall not be required to give security for their appointment.
- (4) The JOLs remuneration and expenses be paid out of the assets of the Company in accordance with Part III of the Insolvency Practitioner's Regulations 2008 (as amended) and CWR O.20.
- (5) The JOLs be authorised to take such steps as may be necessary or expedient for the protection of the Company's assets, and for that purpose may exercise any of the powers specified in Part I and II of the Third Schedule to the Law without further sanction of the Court.

- (6) The costs of this Petition shall be paid out of the assets of the Company, as an expense of the liquidation, to be taxed if not agreed.

DATED this 17 day of September 2010

  
\_\_\_\_\_  
Maples and Calder

**Note: It is intended to serve this Petition on NOMC Insurance Company, Ltd. (In Voluntary Liquidation) and to invite the Court to make the Orders sought without the need for a hearing pursuant to CWR, O15, r 5(1).**

THIS PETITION WAS FILED BY Maples and Calder, attorneys for the Petitioners, whose address for service is PO Box 309, Ugland House, Grand Cayman, KY1-1104, Cayman Islands. (Ref: AAG/CJM/660190/19627868)