

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BROOME

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In the Matter of the Rehabilitation of,	:	INDEX NO. EFCA2024001871
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COLUMBIAN MUTUAL LIFE	:	
INSURANCE COMPANY.	:	AFFIRMATION OF
	:	STEPHANIE BLATTMACHR
	:	
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Stephanie Blattmachr, an attorney at law, duly admitted to practice before the Courts of the State of New York, hereby affirms the following to be true under the penalties of perjury under the laws of New York, which may include a fine or imprisonment and understands that this document may be filed in an action or proceeding in a court of law:

1. I am Assistant Special Deputy Superintendent and Agent of Kaitlin Asrow, Acting Superintendent of Financial Services of the State of New York (“**Superintendent**”), as the court-appointed rehabilitator (the “**Rehabilitator**”) of Columbian Mutual Life Insurance Company (“**CML**”), and General Counsel of the New York Liquidation Bureau (“**NYLB**”), which serves as the Rehabilitator’s staff.

2. I am familiar with the prior pleadings and proceedings that have taken place in CML’s above-captioned rehabilitation proceeding (the “**Rehabilitation Proceeding**”).

3. I submit this affirmation in support of the order to show cause by the Rehabilitator for an order substantially in the form attached hereto as **Exhibit A** (the “**Plan Approval Order**”) (i) approving the proposed *Plan of Rehabilitation for Columbian Mutual Life Insurance Company*, dated December 12, 2025, attached to the accompanying Petition To Approve Rehabilitation Plan For Columbian Mutual Life Insurance Company dated December 12, 2025 (the “**Petition**”) as **Exhibit A**, together with all exhibits thereto (collectively and as the same may

be revised, the “**Plan**”);¹ including approving the consummation of the Transactions contemplated thereby; and (ii) granting such other and further relief as this Court may deem just and proper.

4. The arguments in support of issuing the ultimate relief sought by the proposed order to show cause (the “**Plan Scheduling Order**”) are set forth in the Petition and the exhibits thereto, including the Plan itself and the Disclosure Statement In Support Of Plan Of Rehabilitation For Columbian Mutual Life Insurance Company (the “**Disclosure Statement**”) that is annexed to the Petition as **Exhibit B**. This affirmation addresses the proposed methods of service and the proposed schedule set forth in the Plan Scheduling Order.

Proposed Methods of Service

5. In a rehabilitation proceeding, the rehabilitator, through her staff at the NYLB, often needs to seek an order from the supervising court approving an action proposed by the rehabilitator. Because the relief sought may have an effect on persons who have not appeared before the court, the request for court approval is typically initiated by the filing of an order to show cause that, among other things, contains a briefing and hearing schedule and the method of service of the papers on affected parties. This was the form of notice employed by the Superintendent/Rehabilitator both in connection with initiating this Rehabilitation Proceeding and in seeking Court approval for the sale of CML’s headquarters building. (See NYSCEF Nos. 12 and 33 for the proposed orders to show cause and NYSCEF Nos. 17 and 39 for the orders to show cause entered by the Court.)

6. Typically, the proposed order to cause sets forth that service shall be undertaken by posting the order to show cause and the supporting papers on the NYLB website’s Legal and Estates Notices page and, on occasion, by publishing a short-form notice that

¹ Capitalized terms not defined herein have the meanings ascribed to them in the Plan.

summarizes the order to show cause in a relevant newspaper and refers interested persons to the NYLB website. These forms of notice are included in the proposed Plan Scheduling Order.

7. When, as here, significant issues are presented, the Rehabilitator may propose some additional form of notice. In this case, the proposed Plan calls for the sale and reorganization of CML and the elimination of the Equity Interests currently held by CML's approximately 200,000 policyholders.

8. Accordingly, the Rehabilitator has determined that additional form of notice is warranted, substantially in the form of the Notice of Plan Approval Hearing ("**Hearing Notice**") annexed hereto as **Exhibit B**, which will also serve as the above-referenced newspaper publication notice. The Rehabilitator proposes that the Hearing Notice be mailed to all known CML Policyholders at their address of record contained within CML's business files by first class mail. The Hearing Notice summarizes the instant order to show cause and directs Policyholders to a website ("**Plan Website**") specifically set up for this process (in addition to the NYLB website) that will also contain the Plan Scheduling Order, the Petition and related exhibits including the Plan and the Disclosure Statement describing the Plan, and will also direct Policyholders to a dedicated call center to respond to their questions.

9. The Rehabilitator has determined that the publication and posting of the Hearing Notice on the NYLB website and the Plan Website, coupled with a direct mailing of the Hearing Notice to Policyholders, provides reasonable notice of the Plan to Policyholders and other interested parties, and is the most cost-effective approach. The cost of printing and mailing the two-page Hearing Notice to CML's 200,000 policyholders is estimated by CML's contractor to be just over \$200,000. In contrast, if the entire set of papers were printed and mailed to all CML policyholders, the estimated cost is between \$1 million and \$1.2 million.

10. For the reasons set forth above, the Rehabilitator submits that the proposed forms of notice set forth in the proposed Plan Scheduling Order are appropriate and should be deemed good and sufficient service.

Proposed Schedule For Service, Objections and Responses, and Hearing

11. The proposed schedule for service, including five business days for posting a full set of the papers on the NYLB website, ten business days for mailing the Hearing Notice to all CML Policyholders and posting a full set of papers on the Plan Website, and ten business days to arrange for newspaper publication, is appropriate. Based on our experience, the NYLB can typically post on our website and arrange for newspaper publication within the proposed timeframes. The vendor engaged for printing and mailing to CML's policyholders and posting a full set of papers on the Plan Website indicated that ten business days are required to complete the voluminous printing and mailing.

12. The remaining dates in the proposed Plan Scheduling Order have been left blank for the Court to fill in. We propose the following timeframes are reasonable:

- a. 60 days from the date of the Plan Scheduling Order being issued for any objections or response (the "**Objection Deadline**");
- b. 20 days after the Objection Deadline for the Rehabilitator to reply to any objection or responses (the "**Reply Deadline**");
- c. 10 days after the Reply Deadline for the Court hearing to consider approval of the Plan (the "**Plan Approval Hearing**").
- d. 7 days before the Plan Approval Hearing for the Rehabilitator to file any proposed revisions to the Plan.


13. Therefore, on behalf of the Rehabilitator, I respectfully request that the Court:

- a. issue the scheduling order (*i.e.*, the “**Plan Scheduling Order**”) by entering the proposed order to show cause, which, among other things; (i) sets the date for the Plan Approval Hearing; (ii) establishes a briefing schedule in connection with the approval of the Plan at the Plan Approval Hearing; and (iii) sets forth notice requirements for the Plan Scheduling Order; and
 - b. subject to the Plan Approval Hearing, enter the Plan Approval Order, which order would, among other things, approve the Plan, including the consummation of the Transactions contemplated thereby.
14. There has been no previous application for the relief requested herein.

WHEREFORE, on behalf of the Rehabilitator, I respectfully request that this Court grant the relief requested herein and such other and further relief as this Court may deem just and proper.

Dated: December 12, 2025

By:



Stephanie Blattmachr