

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re :
 : Chapter 15
Petition of David McGuigan, as foreign :
representative of : Case No. 11-13420 (MG)
 :
Tokio Marine Europe Insurance Limited :
 :
Debtor in a Foreign Proceeding. :
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**NOTICE OF FILING AND HEARING ON PETITION UNDER CHAPTER 15 OF THE
UNITED STATES BANKRUPTCY CODE**

PLEASE TAKE NOTICE that on July 18, 2011, David McGuigan, (the “Petitioner”), as the duly appointed foreign representative, as defined in section 101(24) of title 11 of the United States Code (the “Bankruptcy Code”), of Tokio Marine Europe Insurance Limited (the “Scheme Company” or “Debtor”) filed a Verified Petition Under Chapter 15 For Recognition Of A Foreign Proceeding And Motion For Permanent Injunction (the “Verified Petition and Motion”), pursuant to chapter 15 of the Bankruptcy Code with the United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”).

PLEASE TAKE FURTHER NOTICE that, among other things, the Verified Petition and Motion seeks the entry of an order (i) granting recognition in the United States to an adjustment of debt proceeding (the “English Proceeding”) pursuant to Part 26 of the Companies Act 2006 and the scheme of arrangement of the Scheme Company (the “Scheme”) sanctioned by the High Court of Justice of England and Wales (the “English Court”) on April 15, 2011, and (ii) providing for a permanent injunction and related relief. Details of the business included in the Scheme and the former names in which the Scheme Company wrote business can be found in the Scheme documents which are on the Scheme website at www.TMEIScheme.com.

PLEASE TAKE FURTHER NOTICE that the Bankruptcy Court has scheduled a hearing with respect to the Verified Petition and Motion for **September 8, 2011 at 10:00 a.m. (Eastern Time)** before The Honorable Martin Glenn in Courtroom 501 of the Bankruptcy Court located at The Alexander Hamilton Custom House, One Bowling Green, New York, New York 10004-1408, to consider the Verified Petition and Motion, and any motion, answer, objection or other response thereto made in accordance with this Notice.

As part of the English Proceeding, a copy of the Scheme and related notice regarding the submission of claims has been sent to each person or entity of which Pro Insurance Solutions Limited, the Scheme Manager, was aware and which it believed was or might be a Scheme Creditor, and for which it had a current address. Copies of the (i) Notice, (ii) Official Form Chapter 15 Petition of the Scheme Company, (iii) Verified Petition and Motion (without the exhibits thereto), (iv) Memorandum of Law, (v) List submitted pursuant to Bankruptcy Rule 1007(a)(4), (vi) Statement of Foreign Representative required pursuant to 11 U.S.C. § 1515, and (vii) Proposed Order Requesting Recognition of the Scheme and Foreign Proceeding, are available to parties-in-interest on the Bankruptcy Court's website at <http://www.nysb.uscourts.gov> (a PACER login and password are required), on the Scheme website at www.TMEIScheme.com (in addition to the Scheme itself) or upon written request to the Petitioner's United States counsel (including by facsimile or email) addressed to:

Sidley Austin LLP
787 Seventh Avenue
New York, New York 10019
(212) 839-5599 (facsimile)
Attention: Lee S. Attanasio and Alex R. Rovira
lattanasio@sidley.com
arovira@sidley.com

PLEASE TAKE FURTHER NOTICE that any party-in-interest wishing to submit a response or objection to the Verified Petition and Motion or the relief requested by the Petitioner must do so in accordance with the Bankruptcy Code and the Federal Rules of Bankruptcy Procedure, and electronically with the Court by registered users of the Court's electronic case filing system in accordance with General Order M-242 (a copy of which may be viewed on the Court's website at www.nysb.uscourts.gov), and by all other parties-in-interest, on a 3.5 inch disc, preferably in Portable Document Format (PDF), Word Perfect or any other Windows-based word processing format, which disk shall be sent to the Office of the Clerk of the Court, Room 534, One Bowling Green, New York, New York 10004-1408. A hard copy of such response or objection to be sent to the Chambers of the Honorable Martin Glenn, United States Bankruptcy Judge, and served upon Sidley Austin LLP, 787 Seventh Avenue, New York, New York 10019 (Attention: Lee S. Attanasio and Alex R. Rovira), United States counsel to the Petitioner, so as to be received on or before **4:00 p.m. (Eastern Time) on August 29, 2011**.

PLEASE TAKE FURTHER NOTICE that if no response or objection is timely filed and served as provided above, the Court may grant the recognition and relief requested in the Verified Petition and Motion without further notice.

PLEASE TAKE FURTHER NOTICE that the hearing with respect to the relief requested in the Verified Petition and Motion may be adjourned from time to time without further notice other than an announcement in open court of the adjourned date or dates at the hearing or any other further adjourned hearing.

Dated: July 21, 2011
New York, New York

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