



Attorneys

Emil Lax

Mark Segal

Patrick Daniel Gatti

Hon. Cecelia G. Morris
United States Bankruptcy Court
Southern District, New York
355 Main Street
Poughkeepsie, NY 12601-3315

Paralegals

Daidralyn English

Judith Ruiz

Legal Assistant

Kristina Meza

February 25, 2011

Re: Victoria Cottini v. Chartis, insurer
of St. Vincent's Medical Center
D/A: 10/9/2008
Court Docket 10-11963 (CGM)

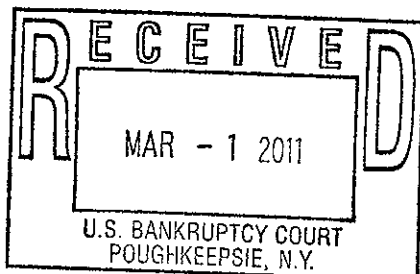
Dear Judge Morris:

This letter is written pursuant to this Court's Final Amended Administrative Order in the St. Vincent's bankruptcy case. This office represents Victoria Cottini, who was injured on October 9, 2008 as a result of the negligence of an uninsured driver. As an 'insured' under the automobile insurance policy issued by Chartis for St. Vincent's Catholic Medical Center, Ms. Cottini brought a claim against Chartis for uninsured motorist benefits. Her claim is against the insurance company only and does not involve St. Vincent's Medical Center and recovery against them is not possible, nor is it sought. Ms. Cottini was a front seat passenger in a vehicle that was owned by St. Vincent Catholic Medical Center on October 9, 2008. The rear of that vehicle was struck by an uninsured driver and under New York State law, Ms. Cottini is entitled to uninsured motorist benefits under the Chartis insurance policy.

Chartis has attempted to use the stay against St. Vincent's Medical Center as a stay of the uninsured motorist arbitration against Chartis. Although, this office does not believe the stay applies to a contractual action against an insurance company only, St. Vincent's attorney thought otherwise and asked this office to move under paragraph 10 of the order for relief from the stay and to allow this action to proceed. Therefore, we formally request the stay be lifted in the arbitration between Victoria Cottini and Chartis Insurance Company. Obviously, Ms. Cottini's recovery is limited to the coverage provided by the policy, but that would have been the case regardless of bankruptcy.

This is not a Court proceeding and there is no full caption. The matter is submitted to the American Arbitration Association by law and the case is titled Victoria Cottini, claimant, against Chartis Insurance Company, respondent. The AAA has assigned a file number of 43 200 S 02161 10.

Thank you for your attention to this matter.



Respectfully yours,

Patrick Daniel Gatti (PG-4027)

Attorneys

Emil Lax

Mark Segal

Patrick Daniel Gatti



Paralegals

Daidralyn English

Judith Ruiz

Legal Assistant

Kristina Meza

Copies to the following per the Order:

St. Vincent Catholic Medical Centers of New York
450 West 33rd Street
New York, NY 10001
Attn: Steven Deluca

Grant Thornton
666 Thirst Avenue, 13th Floor
New York, NY 10017
Attn: Alan Dalsass

Kramer Levin Naftalis & Frankel, LLP
1177 Avenue of the Americas
New York, NY 10036
Attn: P. Bradley O'Neil

Akin, Gump, Strauss, Hauer & Feld, LLP
One Bryant Park
New York, NY 10036
Attn: David H. Botter and Kenneth Davis

Med Mal Trust Monitor
c/o Cooley, LLP
1114 Avenue of the Americas
New York, NY 10036
Attn: Richard S. Kanowitz

Office of the United States Trustee for
the Southern District of New York
33 Whitehall Street, 21st Floor
New York, NY 10004
Attn: Serene Nakano

As a courtesy:

Law Office of Edward Garfinkel
12 Metrotech Center, 28th Floor
Brooklyn, NY 11201

American Arbitration Association
65 Broadway
New York, NY 10006