



*State of New Jersey*

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May 15, 2026

**Via eCourts**

Hon. Patrick J. Bartels, P.J. Ch.  
Superior Court of New Jersey  
Chancery Division  
175 South Broad Street  
Trenton, NJ 08650

**Re: Commissioner of Banking and Insurance v. New Jersey Physicians United Reciprocal Exchange  
Docket No.  
Verified Complaint and Petition for Liquidation**

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Dear Judge Bartels:

This office represents the Plaintiff, Commissioner of the New Jersey Department of Banking and Insurance, in the above-referenced action. The Commissioner deems it necessary and advisable to seek an Order of Liquidation with respect to the Defendant, New Jersey Physicians United Reciprocal Exchange ("NJ PURE").

Enclosed for Your Honor's consideration please find the following documents:

- 1) Verified Complaint;
- 2) Petition for Liquidation;
- 3) Certification of David Wolf;
- 4) Letter Brief;
- 5) Proposed Order to Show Cause with Temporary Restraints; and
- 6) Proposed Order of Liquidation.

For the reasons set forth in the supporting documents, the Commissioner respectfully requests that Your Honor consider this application and, if appropriate, enter the Order to Show Cause as soon as possible. In order to protect NJ PURE's subscribers, creditors and the public at large, as described in the



supporting documents, the Commissioner further respectfully requests that Your Honor set a return date for the Order to Show Cause as soon as is possible.

Thank you for your consideration.

Respectfully submitted,

JENNIFER DAVENPORT  
ATTORNEY GENERAL OF NEW JERSEY

By: s/ Jeffrey S. Posta  
Jeffrey S. Posta  
Deputy Attorney General

cc: Service List