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July 24, 2026

Via eCourts

Hon. Jodi F. Bouer, J.S.C.
Superior Court of New Jersey, Chancery Division
175 South Broad Street
Trenton, NJ 08650

Re: Commissioner, New Jersey Department of Banking and Insurance v. New Jersey Physicians United Reciprocal Exchange
Docket No. MER-C-32-26
Reply of Plaintiff to Responses to Order to Show Cause
Hearing Date: July 27, 2026 at 9 a.m.

Dear Judge Bouer:

This office represents the Plaintiff, Acting Commissioner of the New Jersey Department of Banking and Insurance ("Commissioner"), in the above-referenced action. We write in response to Desrie L. Mason-Jimerson's Supplemental Letter Brief to her Limited Contesting Response (the "Supplemental Letter Brief") to the May 26, 2026 Order to Show Cause.

For the reasons set forth in the Commissioner's letter brief filed with the court on July 13, 2026, as well as in the letter brief of New Jersey Property-Liability Insurance Guaranty Association filed with the court on July 23, 2026, the proposed Order of Liquidation submitted by the Commissioner on July 13 should be entered by the court without



modification, including especially paragraph 11 implementing the 120-day stay set forth in N.J.S.A. 17:30A-18.

The Commissioner requests that the court approve the Commissioner's Petition to Liquidate NJ PURE, enter the revised Order of Liquidation the Commissioner previously filed with the court, and deny any relief requested in the Supplemental Letter Brief as inconsistent with the statutory stay mandated by N.J.S.A. 17:30A-18.

Respectfully submitted,

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cc: All Counsel (via eCourts)