

appointing the Honorable William C. Meehan (retired) as Special Master to hear and adjudicate objections to Integrity's Notices of Determination pursuant to the Amended Liquidation Closing Plan.

PLEASE TAKE FURTHER NOTICE that the undersigned shall rely upon the within Notice of Motion, proposed form of Order, and supporting Certification of Deputy Liquidator Richard L. White.

PLEASE TAKE FURTHER NOTICE that oral argument is waived in connection with this Motion unless an objection is filed.

MAZIE SLATER KATZ & FREEMAN, LLC
Attorneys for Neil N. Jasey, Commissioner of the New
Jersey Department of Banking and Insurance in his capacity
as Liquidator of the Estate of Integrity Insurance Company

By: 

DAVID M. FREEMAN

DATED: November 30, 2009

MAZIE SLATER KATZ & FREEMAN, LLC

103 Eisenhower Parkway
Roseland, New Jersey 07068
(973) 228-9898

Attorneys for Neil N. Jasey, the Commissioner of the New Jersey
Department of Banking and Insurance
in his capacity as Liquidator of Integrity
Insurance Company

IN THE MATTER OF:	:	SUPERIOR COURT OF NEW JERSEY
	:	CHANCERY DIVISION: BERGEN COUNTY
	:	GENERAL EQUITY PART
 THE LIQUIDATION OF INTEGRITY INSURANCE COMPANY	 :	 Docket No.: C-7022-86
	:	:
	:	CERTIFICATION OF RICHARD L.
	:	WHITE IN SUPPORT OF MOTION
	:	FOR APPOINTMENT OF SPECIAL
	:	MASTER
	:	:
	:	:

RICHARD L. WHITE, of full age, duly certifies and states:

1. I am the Deputy Liquidator of the Estate of Integrity Insurance Company ("Integrity"). This Certification is submitted in support of the Liquidator's application pursuant to Rule 4:41-1 to appoint the Honorable William C. Meehan (retired) as Special Master to hear and resolve objections to Integrity's Notices of Determination ("NOD") issued in accordance with Integrity's Amended Liquidation Closing Plan (the "LCP"). Integrity will be issuing notices of determination by January 28, 2010. In the event that claimants disagree with the Liquidator's NODs, they are entitled to file objections to the notices. If the parties are unable to resolve those objections, they will need to be adjudicated. Accordingly, Integrity seeks appointment of a new Special Master to address these disputes.

2. The Court has previously appointed special masters to hear various issues relating to Integrity's liquidation. By Order dated December 23, 2005 and pursuant to Rule 4:41-1, the Court appointed Janet Burak and Charles F. Cook as Special Masters to hear claimants' objections to Integrity's NODs (as well as for other issues) and to make recommendations as to the allowance/disallowance of claims under Integrity's closing plan in place at that time, the Fourth Amended Final Dividend Plan ("FDP"). A copy of the December 23, 2005 Order is attached hereto as Exhibit "A". The Order provided that all objections to Integrity's NODs would be referred to Ms. Burak initially. The Order also provided that Ms. Burak would rule on any objections which did not present actuarial issues and that Ms. Burak would refer any objections which presented actuarial issues to Mr. Cook.

3. In mid-2007, the Liquidator sought and obtained an Order confirming Ms. Burak's and Mr. Cook's appointment as Special Masters. A copy of the June 27, 2007 Order Clarifying and Confirming Appointment of Janet J. Burak and Charles F. Cook as Special Masters Pursuant to Rule 4:41-1 is attached hereto as Exhibit "B".

4. On June 12, 2008, Integrity submitted the current closing plan, the LCP, for approval by the Court. This Court granted its motion and approved the LCP on June 20, 2008.

5. On or about March 2009, Ms. Burak advised me that she would be moving out-of-state and consequently, would no longer be available to serve as Special Master in this matter. As a result, on April 13, 2009, Integrity made a motion to remove Ms. Burak as Special Master and sought permission to apply to the Court for the appointment of a

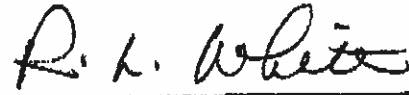
new Special Master in the future. The Court granted Integrity's motion by Order dated May 1, 2009, a copy of which is attached hereto as Exhibit "C".

6. Under the LCP, all proofs of claim had to be filed with Integrity as of September 30, 2009, and the Liquidator must issue NODs to all claimants by January 28, 2010. One claimant already has filed an objection to Integrity's NOD, and the Liquidator anticipates that additional claimants will file objections in the near future. The Liquidator is therefore requesting that the Honorable William C. Meehan (retired) be appointed Special Master to hear and resolve these objections. Judge Meehan is particularly well suited to serve as Special Master. Judge Meehan presided over Integrity's liquidation from the time that Integrity was declared insolvent and placed in liquidation on March 24, 1987, until approximately July 2008 when he retired. Thus, Judge Meehan is extremely knowledgeable about these liquidation proceedings. For these reasons, Judge Meehan is best qualified to serve as Special Master to adjudicate disputes over Integrity's NODs.

7. I have spoken with Judge Meehan, and he has advised me that he is willing to serve as Special Master.

8. For the foregoing reasons, I respectfully request that the Court grant the Liquidator's motion to appoint the Honorable William C. Meehan (retired) as Special Master.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.



RICHARD L. WHITE

Dated: November 25 2009

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SILLS CUMMIS EPSTEIN & GROSS P.C.
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Attorneys for the Commissioner of Banking
and Insurance of the State of New Jersey
In his capacity as Liquidator of
Integrity Insurance Company

FILED

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WILLIAM C. MEEHAN, P.J.S.C.

IN THE MATTER OF:

THE LIQUIDATION OF INTEGRITY
INSURANCE COMPANY

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION: BERGEN COUNTY
GENERAL EQUITY PART

Docket No. C-7022-86

Civil Action

ORDER APPOINTING JANET J. BURAK
AND CHARLES F. COOK AS SPECIAL
MASTERS PURSUANT TO RULE 4:41-1.

THIS MATTER being opened to the Court upon the application of Silis Cummis Epstein & Gross P.C. (Thomas S. Novak, Esq. appearing), attorneys for the Commissioner of Banking and Insurance of the State of New Jersey, in his capacity as liquidator (the "Liquidator") of Integrity Insurance Company ("Integrity"), for an Order appointing Janet J. Burak and Charles F. Cook as Special Masters pursuant to Rule 4:41-1 for purposes of allowing/disallowing claims submitted pursuant to the Fourth Amended Final Dividend Plan ("FDP"); and upon notice to all persons who responded to this Court's Order Modifying Procedures dated February 16, 1994 and requested notice of future proceedings involving Integrity; and the Court having considered the Certification of Deputy Liquidator Richard L. White submitted in support of this motion, any opposing papers, and the argument of counsel in open Court; and for good cause shown;

IT IS on this 23rd day of December, 2005:

ORDERED that Janet J. Burak and Charles F. Cook are hereby appointed as Special Masters pursuant to Rule 4:41-1 for the purpose of assisting the Court in allowing/disallowing

claims submitted pursuant to the FDP, and it is further

ORDERED that all objections to Notices of Determination pursuant to the FDP shall be initially referred to Ms. Burak for a determination of whether they present actuarial issues to be resolved by Mr. Cook.



Hon. William C. Meehan,
F.J.S.C.

PAPERS CONSIDERED:

Notice of Motion	_____
Movant's Certification	_____
Opposing Papers	_____
Other	_____

RECEIVED

FILED

JUN 27 2007

WILLIAM C. KEENAN, P.L.L.C.

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103 Eisenhower Parkway
Roseland, New Jersey 07068
(973) 228-9898
Attorneys for the Commissioner of Banking
and Insurance of the State of New Jersey
in his capacity as Liquidator of Integrity
Insurance Company

IN THE MATTER OF:

THE LIQUIDATION OF
INTEGRITY INSURANCE
COMPANY

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION: BERGEN COUNTY
GENERAL EQUITY PART

Docket No.: C-7022-86

ORDER CLARIFYING AND
CONFIRMING APPOINTMENT OF
JANET J. BURAK AND CHARLES
F. COOK SPECIAL MASTERS
PURSUANT TO RULE 4:41-1

THIS MATTER being opened to the Court upon the application of Mazie Slater Katz & Freeman, LLC (David M. Freeman, Esq, appearing), attorneys for the Commissioner of Banking and Insurance of the State of New Jersey, in his capacity as liquidator (the "Liquidator") of Integrity Insurance Company ("Integrity"), for an Order clarifying and confirming the order filed by this Court December 23, 2005 appointing Janet J. Burak and Charles F. Cook as Special Masters pursuant to Rule 4:41-1; and upon notice to all persons on the attached service list; and the Court having considered the Certification of Deputy Liquidator Richard L. White submitted in support of this motion, any opposition papers, and the argument of counsel in open Court; and for good cause shown;

IT IS on this 27th day of June, 2007;

ORDERED that the December 23, 2005 Order appointing Janet J. Burak and Charles F. Cook as Special Masters pursuant to 4:41-1 is confirmed that Ms. Burak and Mr. Cook

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continue to have authority to hear objections to Integrity's Notices of Determination; and it is further

ORDERED that all objections to Integrity's Notices of Determination shall be initially referred to Ms. Burak for a determination of whether they present actuarial issues to be resolved by Mr. Cook.


HONORABLE WILLIAM C. MEEHAN, P.J.S.C.

PAPERS CONSIDERED:

- Notice of Motion
- Movant's Certification
- Opposing Papers
- Other

(HADAM\Integrity\Kelly Moore\Objections\Order clarifying appoint of Burak and Cook Special Masters.doc)

MAZIE SLATER KATZ & FREEMAN, LLC
103 Eisenhower Parkway
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Attorneys for the Commissioner of Banking
and Insurance of the State of New Jersey
in his capacity as Liquidator of Integrity
Insurance Company

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MAY 01 2009

Robert C. Wilson
J.S.C.

MAY 01 2009

IN THE MATTER OF:	: SUPERIOR COURT OF NEW JERSEY : CHANCERY DIVISION: BERGEN COUNTY : GENERAL EQUITY PART
THE LIQUIDATION OF INTEGRITY INSURANCE COMPANY	: Docket No.: C-7022-86 : C-63-03
	: ORDER REMOVING JANET J. : BURAK AS SPECIAL MASTER

THIS MATTER being opened to the Court upon the application of Mazie Slater Katz & Freeman, LLC (David M. Freeman, Esq. appearing), attorneys for the Commissioner of Banking and Insurance of the State of New Jersey, in his capacity as liquidator (the "Liquidator") of Integrity Insurance Company ("Integrity"), for an Order removing Janet J. Burak as Special Master; and upon notice to all persons on the attached service list; and the Court having considered the Certification of Deputy Liquidator Richard L. White submitted in support of this motion, any opposition papers, and the argument of counsel in open Court; and for good cause shown;

IT IS on this 1st day of May, 2009;

ORDERED that Ms. Burak is removed as Special Master in this matter; and it is further

~~ORDERED~~ that Integrity may apply to Court for the appointment of a new Special Master, if necessary, to resolve a dispute between Integrity and a claimant regarding Integrity's Notice of Determination.


HONORABLE ROBERT C. WILSON, J.S.C.

PAPERS CONSIDERED:

Notice of Motion	_____
Movant's Certification	_____
Opposing Papers	_____
Other	_____

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Integrity's Notices of Determination pursuant to the Amended Liquidation Closing Plan;
and it is further

ORDERED that if the Honorable William C. Meehan (retired) determines that any objection to a Notice of Determination presents any actuarial issues, they are to be referred for resolution to Charles F. Cook who was previously appointed to adjudicate such disputes by Order dated December 23, 2005.

HONORABLE ROBERT C. WILSON, J.S.C.

PAPERS CONSIDERED:

Notice of Motion	_____
Movant's Certification	_____
Opposing Papers	_____
Other	_____

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