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At IAS Part 83 of the Supreme Court of the State of New York, County of Kings, at the Courthouse located at 360 Adams Street, Brooklyn, New York, on the 22nd day of December, 2022.

P R E S E N T:

HON. INGRID JOSEPH, J.S.C.

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

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In the Matter of

Index.No.: 530297/2021

the Liquidation of

ORDER TO SHOW CAUSE

FREELANCERS INSURANCE COMPANY, INC.
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Upon the October 20, 2022, affirmation of Melissa A. Pisapia ("Pisapia Aff"), an attorney with the New York Liquidation Bureau ("NYLB"), which serves as the staff for Adrienne A. Harris, Superintendent of Financial Services of the State of New York in her capacity as liquidator ("Liquidator") of Freelancers Insurance Company, Inc. ("FIC") for an order approving, *inter alia*, the Liquidator's report to the Court on the status of, and request to close, FIC's liquidation proceeding ("Closing Report") and the financial transactions detailed therein; and upon all other papers previously submitted and all proceedings heretofore had herein;

NOW, on motion of Stephanie Blattmachr, attorney for the Liquidator, and after due deliberation having been had thereon;

LET all policyholders, creditors, claimants and others interested in the affairs of FIC or counsel appear and show cause before this Court at IAS Part 83, thereof, at the Courthouse located Room 424 at 360 Adams Street, Brooklyn, in the County of Kings, City and State of New York, on the 24 day of January, 2023 at 9:30 o'clock a.m. ("Return Date") or as soon thereafter as counsel can

be heard, why an order substantially in the form as the proposed order attached as Exhibit "1" to the Pisapia Aff, should not be made, pursuant to Article 74 of the New York Insurance Law ("Insurance Law"), *inter alia* (i) approving the Closing Report and the financial transactions delineated therein; (ii) authorizing the continued payment of actual and necessary administrative expenses, if any, including such expenses pertaining to the closing of the liquidation proceeding; (iii) approving the recommendation made by the Liquidator to allow the Class Six claim submitted in the liquidation proceeding, entitling the National Association of Insurance Commissioners to share as a Class Six creditor in the distribution of the assets of FIC; (iv) authorizing the Liquidator to distribute FIC's assets, except for the Restricted Assets, consistent with the priorities set forth in Insurance Law Section 7434, to those creditors of FIC with allowed claims; (v) terminating and closing the liquidation proceeding; (vi) authorizing the Liquidator, upon the closing of the liquidation proceeding, to distribute to Freelancers Union, Inc. as the Class Nine shareholder, all assets remaining after payment of administrative expenses and claims, except for Restricted Assets, and to handle the Restricted Assets in accordance with New York Abandoned Property Law; (vii) authorizing the Liquidator to receive and disburse, without further application to this Court, any receipts that are received after the termination of the liquidation proceeding; (viii) authorizing the Liquidator, after termination of the liquidation proceeding and without further order of this Court, to destroy or otherwise dispose of any and all of the books, files, records (paper or electronic) and other property of the FIC estate; and (ix) releasing and discharging the Liquidator, her predecessors and successors in office, and their agents, attorneys and employees, from any and all liability arising from their acts or omissions in connection with the liquidation proceeding; and;

AND, sufficient cause having been alleged therefor, and this Court having found the form and method of service of notice specified herein to be reasonable and appropriate under the circumstances, it is hereby

ORDERED, that service of a copy the entered Order to Show Cause and its supporting papers shall be deemed good and proper service if served by: (i) USPS First-Class mail on the National Association of Insurance Commissioners at P.O. Box 87-9135, Kansas City, Missouri, 64187-9135 and 1100 Walnut Street, Suite 1500, Kansas City, Missouri, 64106-2197 at least ten (10) days before the Return Date; and (ii) posting on the Legal and Estates Notices Section of the Internet web page maintained by the NYLB at <http://www.nylb.org> within five (5) days of the entered Order to Show Cause being posted to the New York State Courts Electronic Filing (NYSCEF) system; ~~and it is further~~

~~ORDERED, that answering papers, either in support of or opposition to the relief sought herein (the "Answering Papers"), shall be served on the Liquidator via email to legal@nylb.org so as to be received at least seven (7) days before the Return Date, and that any Answering Papers, together with an affidavit of service, shall be filed with the Court on the NYSCEF system on or before the Return Date.~~

ENTER:



Hon. Ingrid Joseph
Supreme Court Justice

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