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Superior Court of New Jersey
Chancery Division, Mercer County

Docket No.: *E-54-14*

In re Ocean Risk Retention Group, Inc. (in
liquidation),

CIVIL ACTION

Petitioner.

ORDER TO SHOW CAUSE

WITH TEMPORARY RESTRAINTS

PURSUANT TO RULE 4:52

THIS MATTER being brought before the court by William Megna, attorney for petitioner Ocean Risk Retention Group, Inc. (in liquidation), seeking relief by way of temporary restraints pursuant to R. 4:52, based upon the facts set forth in the verified complaint filed herewith; and it appearing that and it appearing that interested parties have notice of this application and consent to petitioner's application and for good cause shown.

It is on this *17th* day of *July* 2014 ORDERED that petitioner, Ocean Risk Retention Group, Inc. (in liquidation) (~~Ocean~~) and all other interested parties, appear and show cause before the Superior Court at the Mercer County Courthouse in Trenton, New Jersey at *9:00* clock or as soon thereafter as counsel can be heard, on *September 26* 2014 why an order should not be issued:

- A. Staying all proceedings pending in the State of New Jersey in which Ocean is a party or obligated to defend a party until further court order; and further
- B. Serving a copy of this order upon the Civil Presiding Judge and the Civil Division Manager of each Vicinage in this state ten days following the execution of the order; and further
- C. Directing Ocean to compile a list of all cases involving Ocean on or before August 10, 2014 to the administrative offices of the court; and further
- D. Directing that this order be published in the New Jersey Law Journal and all other newspapers in which the liquidation notices were published.
- E. Granting such other relief as the court deems equitable and just.

And it is further *ORDERED* that pending the return date herein, all proceedings pending in the State of New Jersey in which Ocean is a party or obligated to defend a party are stayed and enjoined.

And it is further *ORDERED* that:

1. Interested parties may move to dissolve or modify the temporary restraints herein contained on two (2) days' notice to the petitioner's attorney.
2. A copy of this order to show cause, verified complaint, legal memorandum and any supporting affidavits or certifications submitted in support of this application be served upon the Attorney General of the State of New Jersey and the Commissioner of the State of New Jersey Department of Banking and Insurance personally ^{and} or by mail within ten (10) days of the date hereof, in accordance with R. 4:4-3 and R. 4:4-4, this being original process.

3. The petitioner must file with the court his/her/its proof of service of the pleadings on the Attorney General of the State of New Jersey and the Commissioner of the State of New Jersey Department of Banking and Insurance no later than three (3) days before the return date.

4. The Attorney General of the State of New Jersey and the Commissioner of the State of New Jersey Department of Banking and Insurance or other interested parties shall file and serve a written response to this order to show cause and the request for entry of injunctive relief and proof of service by August 27, 2014. The original documents must be filed with the Clerk of the Superior Court in the county listed above. A directory of these offices is available in the Civil Division Management Office in the county listed above and online at http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf. You must send a copy of your opposition papers directly to Judge Innes, whose address is 175 South Broad Street (1st Floor), Civil Law Post Office Box 8068, Trenton, New Jersey 08650-0068. You must also send a copy of your opposition papers to the petitioner's attorney whose name and address appears above. A telephone call will not protect your rights; you must file your opposition and pay the required fee of \$ 135 and serve your opposition on your adversary, if you want the court to hear your opposition to the injunctive relief the petitioner is seeking.

5. The petitioner must file and serve any written reply to an interested party's order to show cause opposition by Sept. 3, 2014. The reply papers must be filed with the Clerk of the Superior Court in the county listed above and a copy of the reply papers must be sent directly to the chambers of Judge Innes.

6. If the interested party does not file and serve opposition to this order to show cause, the application will be decided on the papers on the return date and relief may be granted by default, provided that the petitioner files a proof of service and a proposed form of order at least three days prior to the return date.

7. If the petitioner has not already done so, a proposed form of order addressing the relief sought on the return date (along with a self-addressed return envelope with return address and postage) must be submitted to the court no later than three (3) days before the return date.

8. Interested parties take notice that the petitioner has filed a lawsuit which may affect your rights in the Superior Court of New Jersey. The verified complaint attached to this order to show cause states the basis of the lawsuit. If you dispute this complaint, you, or your attorney, must file a written answer to the complaint and proof of service within 35 days from the date of service of this order to show cause; not counting the day you received it.

These documents must be filed with the Clerk of the Superior Court in the county listed above. A directory of these offices is available in the Civil Division Management Office in the county listed above and online at http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf. Include a \$ 135 filing fee payable to the "Treasurer State of New Jersey." You must also send a copy of your Answer to the petitioner's attorney whose name and address appear above. A telephone call will not protect your rights; you must file and serve your Answer (with the fee) or judgment may be entered against you by default. Please note: Opposition to the order to show cause is not an Answer and you must file both. Please note further: if you do not file and serve an Answer within 35 days of this Order, the Court may enter a default against you for the relief petitioner demands.

9. If you cannot afford an attorney, you may call the Legal Services office in the county in which you live or the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529). If you do not have an attorney and are not eligible for free legal assistance you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A directory with contact information for local Legal Services Offices and Lawyer Referral Services is available in the Civil Division Management Office in the county listed above and online at http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf.

10. The court will entertain argument, but not testimony, on the return date of the order to show cause, unless the court and parties are advised to the contrary no later than 2 days before the return date.



J.S.C.
PAUL INNES, P.J.Ch.
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