



**NOTICE: LIQUIDATION AND DISSOLUTION OF
AFFILIATED PHYSICIANS AND EMPLOYERS
MASTER TRUST D/B/A MEMBER HEALTH PLAN
NJ,**

NOTICE

**THE ORDERS APPROVING CONFIDENTIAL SETTLEMENT AGREEMENTS AND
RELEASES, AND GRANTING RELATED RELIEF ARE ENCLOSED FOR THE
FOLLOWING MATTERS:**

- Confidential Settlement Agreement and Release by and between **APEMT**, Megna Law Firm and William F. Megna (collectively, “Megna”) and Definitive Insurance Management Services (“**Definitive**”) (**APEMT**, Megna and Definitive are hereinafter referred to collectively as the “Parties (the “Motion”).
- Confidential Settlement Agreement and Release entered into by and between by and between Windsor Strategy Partners, their insurers, including the Hiscox Insurance Company, and their agents, servants, employees, successors, predecessors and assignees are hereinafter referred to collectively as the “Parties (the “Motion”).

After extensive negotiations, each Party agreed to resolve each matter and have entered into a separate Confidential Settlement Agreement and Release (the “Settlement Agreement”). The Settlement Agreement collectively states that all claims the Parties have against each other are hereby resolved in full satisfaction in exchange for a certain payment.

PLEASE TAKE NOTICE that on the **2nd day of August, 2024, at 9:00 a.m.**, or as soon thereafter as counsel may be heard, the undersigned counsel to Brian W. Hofmeister (the “Independent Receiver”) shall move before the Honorable Frank J. DeAngelis, P.J. Ch. at the Superior Court of New Jersey, Morris County Courthouse, Chancery Division, 10 Court Street, Floor 4, Morristown, New Jersey for an Order approving the Confidential Settlement Agreements and Releases, and granting related relief (“Motions”).

PLEASE TAKE FURTHER NOTICE that in support of the within Motions enclosed, the undersigned shall rely upon the Certification of the Independent Receiver, submitted herewith in support of the relief requested.

PLEASE TAKE FURTHER NOTICE that the within Motions will be brought before the Court pursuant to Rule 1:6-2. A proposed form of Orders was submitted herewith.

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