

IN THE CIRCUIT COURT OF THE  
SECOND JUDICIAL CIRCUIT, IN AND  
FOR LEON COUNTY, FLORIDA

In re: THE RECEIVERSHIP of  
PHYSICIANS UNITED PLAN, INC.,  
a Florida corporation

CASE NO.: 2014-CA-01472

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**DEPARTMENT'S MOTION FOR COURT TO SET CLAIMS BAR DATE**

The Florida Department of Financial Services, as Receiver for Physicians United Plan, Inc. ("PUP" or "the Department"), files this Motion for Court to Set Claims Bar Date, and states as follows:

1. On June 9, 2014, the Florida Department of Financial Services was appointed Receiver of Physicians United Plan, Inc. by Order of this Court for purposes of rehabilitation. The Consent Order entered on that date further stated that liquidation would be effective July 1, 2014.

2. PUP was a Florida Health Maintenance Organization based in Orlando, Florida.

3. Pursuant to section 631.021(1), Florida Statutes, this Court has jurisdiction over the PUP receivership and is authorized to enter all necessary and/or proper orders to carry out the purpose of the Florida Insurers Rehabilitation and Liquidation Act, Part I, Chapter 631, Florida Statutes ("the Act").

4. The Act is to be interpreted liberally and equitably, as stated in section 631.001:

**631.001 Title, construction, and purpose.—**

(1) This part constitutes and may be cited as the "Insurers Rehabilitation and Liquidation Act.

(2) This part shall be liberally construed to effect the purposes of this part.

(3) The purposes of this part, which are integral elements of the regulation of the business of insurance and are of vital public interest and concern, are to:

(a) Protect the interests of policyholders, creditors, and other claimants and the public.

(b) Provide a comprehensive scheme for administering insurer receiverships....  
(emphasis added)

5. The Department submitted four Interim Claims Reports for Court approval. At the present time, distribution to claimants is anticipated to be 100% to Class 1, and on a pro rata basis to Class 2.

6. The Department requests the Court to set a bar date in the PUP receivership for the filing of claims. A bar date will not only prevent any delay in the discharge date that might come from late-filed claims, but will also preserve the funds in this receivership for those claimants that timely filed claims and are entitled to a distribution.

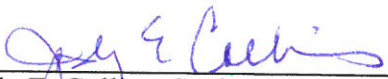
7. Having a claims bar date will also enable the Department to more efficiently process the final stages necessary to wrap up the PUP receivership, so that late claims do not interrupt and delay those tasks, such as preparation of the final distribution and discharge accounting, or create a delay in the discharge date by causing the filing of another interim claim report and accompanying objection period.

8. The proposed bar date would be the date of entry of the Order granting this Motion.

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WHEREFORE the Department of Financial Services as Receiver for Physicians United Plan, Inc., requests the Court to grant this Motion and enter an Order setting a date certain after which no further claims may be filed.

Respectfully submitted this 2<sup>nd</sup> day of March, 2019.

  
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