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7
8 SUPERIOR COURT OF ARIZONA
9 COUNTY OF MARICOPA

10 STATE OF ARIZONA, *ex rel.*
11 KEITH SCHRAAD, Interim Director
of Insurance,

12 Plaintiff,

13 vs.

14 COMPASS COOPERATIVE MUTUAL
HEALTH NETWORK, INC., dba MERITUS
15 MUTUAL HEALTH PARTNERS, an
Arizona corporation; and
16 COMPASS COOPERATIVE HEALTH
PLAN, INC., dba MERITUS HEALTH
PARTNERS, an Arizona corporation,

17 Defendants.
18

No. CV2016-011872

PETITION NO. 27

**PETITION TO ACCEPT EIGHTH
STATUS REPORT FOR THE
PERIOD ENDING SEPTEMBER 30,
2018**

(Assigned to The Honorable
Daniel Martin)

19 Keith Schraad, Interim Director of Insurance, as Receiver (hereinafter “Receiver”)
20 of Compass Cooperative Mutual Health Network, Inc. doing business as Meritus Mutual
21 Health Partners (“Meritus Mutual”) and Compass Cooperative Health Plan, Inc. dba
22 Meritus Health Partners (“MHP”) (collectively referred to as the “Meritus Companies”),
23 appointed pursuant to A.R.S. § 20-611, *et seq.*, hereby petitions the Court for entry of the
24 Order re Petition No. 27 Accepting Eighth Status Report for the Period Ending
25 September 30, 2018 for the reasons set forth herein.

26 1. In an Order dated August 10, 2016, this Court placed Meritus Mutual and
27 MHP into receivership under orders of liquidation.
28

1 c. Change of Contact Information. As reflected in previous filings with
2 this Court, the contact information for the lead attorney representing the Receiver in these
3 matters was changed.

4 d. Accounting Services and General Accounting and Administrative.
5 The Receiver contracted with Regulatory Services Group, subject to this Court's May 23,
6 2017 Order Re Petition No. 11 Approving Rates for Accounting Services. During the
7 second quarter of 2018, additional work continued to be done on the accounting of the
8 Meritus Companies in Liquidation, including work on a liquidation balance sheet.

9 e. Third Party Documents. The Receiver previously issued several
10 demands to third parties requesting production of documents. Review and evaluation of
11 those documents and related issues continued.

12 Summary of Payments

13 5. Legal Counsel. During the reporting period, the total amounts (fees and
14 expenses) that have been paid to legal counsel are \$8,823.00 for Meritus Mutual and
15 \$8,823.00 for MHP for a combined amount of \$17,646.00. Work was performed and
16 invoices were submitted for additional services and amounts during the reporting period
17 but not paid until after September 30, 2018. Because of the timing, those payments will be
18 referenced in the next status report.

19 6. Special Deputy Receiver. During the reporting period, the total amounts
20 (fees and expenses) that have been paid to the Special Deputy Receiver are \$7,395.00 for
21 Meritus Mutual and \$6,720.00 for MHP for a combined amount of \$14,115.00. Work was
22 performed and invoices were submitted for additional services and amounts during the
23 reporting period but not paid until after September 30, 2018. Because of the timing, those
24 payments will be referenced in the next status report.

25 7. Regulatory Services Group. During the reporting period, the total amounts (fees
26 and expenses) that have been paid to Regulatory Services Group are \$2,015.00 for Meritus
27 Mutual and \$2,015.00 for MHP for a combined amount of \$4,030.00. Work may have
28 been performed and invoices submitted for additional services and amounts during the

1 reporting period but not paid until after September 30, 2018. Because of the timing, those
2 payments, if any, would be referenced in the next status report.

3 WHEREFORE, the Receiver requests that the Court enter the Order re Petition
4 No. 27 Accepting Eighth Status Report for the Period Ending September 30, 2018 in the
5 form lodged concurrently with this Petition after expiration of the objection period.

6 Dated this 17th day of December, 2018.

7 FAEGRE BAKER DANIELS LLP

8 By: /s/ Joel Glover (#034018)
9 Joel A. Glover

10 *Attorneys for Receiver*

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12
13 COPY of the foregoing mailed this
14 17th day of December, 2018 to the
15 attached Master Service List

16 /s/ Brenda McHenry
17 Brenda McHenry

1 SUPERIOR COURT OF ARIZONA

2 COUNTY OF MARICOPA

3
4 No. CV2016-011872 (Assigned to The Honorable Daniel Martin)

5 **MASTER SERVICE LIST**

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