

1 **FAEGRE DRINKER BIDDLE & REATH LLP**  
1144 15<sup>th</sup> Street, Suite 3400  
2 Denver, Colorado 80202

3 **Joel A. Glover** (State Bar No. 034018)  
Direct Dial: 303.607.3648  
4 Direct Fax: 303.607.3600  
Email: [Joel.Glover@Faegredrinker.com](mailto:Joel.Glover@Faegredrinker.com)  
5

6 Attorneys for Receiver

7  
8 SUPERIOR COURT OF ARIZONA  
9 COUNTY OF MARICOPA

10 STATE OF ARIZONA, *ex rel.*  
11 BARBARA D. RICHARDSON, Director of  
Insurance,

12 Plaintiff,

13 vs.

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

17 Defendants.  
18

No. CV2016-011872

**PETITION NO. 56**

**PETITION TO ACCEPT TWENTY-  
SIXTH STATUS REPORT FOR THE  
PERIOD ENDING MARCH 31, 2023**

(Assigned to The Honorable  
Dewain Fox)

19 Darren Ellingson, in his capacity as the Special Deputy Receiver of Compass  
20 Cooperative Mutual Health Network, Inc. doing business as Meritus Mutual Health  
21 Partners (“Meritus Mutual”) and Compass Cooperative Health Plan, Inc. dba Meritus  
22 Health Partners (“MHP”) (collectively referred to as the “Meritus Companies”), appointed  
23 pursuant to A.R.S. § 20-611, *et seq.*, hereby petitions the Court for entry of the Order re  
24 Petition No. 56 to Accept Twenty-Sixth Status Report for the Period Ending March 31,  
25 2023 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 part of the accounting work, the Receiver continued to implement and account for the  
2 Receivership Liquidation, the Setoff involving CMS, and the Return of Excess Premiums,  
3 among other things.

#### 4 Summary of Payments

5 5. Legal Counsel. During the reporting period, the total amounts (fees and  
6 expenses) that have been paid to Faegre Drinker Biddle & Reath LLP as legal counsel are  
7 \$3,673.00 for Meritus Mutual and \$2,751.50 for MHP for a combined amount of  
8 \$6,424.50. While the majority of the work was allocated between the two companies,  
9 legal expenses associated exclusively with Meritus Mutual totaled \$921.50. Work was  
10 performed and invoices were submitted for additional services and amounts during the  
11 reporting period but not paid until after March 31, 2023. Because of the timing, those  
12 payments will be referenced in the next status report.

13 6. Special Deputy Receiver. During the reporting period, the total amounts  
14 (fees and expenses) that have been paid to the Special Deputy Receiver are \$11,435.00 for  
15 Meritus Mutual and \$9,580.00 for MHP for a combined amount of \$21,015.00. While the  
16 majority of the work was allocated between the two companies, expenses associated  
17 exclusively with Meritus Mutual totaled \$1,855. Work was performed and invoices were  
18 submitted for additional services and amounts during the reporting period but not paid  
19 until after March 31, 2023. Because of the timing, those payments will be referenced in  
20 the next status report.

21 7. Regulatory Services Group. During the reporting period, no payments were  
22 made to the Regulatory Services Group. Work may have been performed and invoices  
23 submitted for additional services and amounts during the reporting period but not paid  
24 until after March 31, 2023. Because of the timing, those payments, if any, would be  
25 referenced in the next status report.

26 WHEREFORE, the Receiver requests that the Court enter the Order re Petition  
27 No. 56 Accepting Twenty-Sixth Status Report for the Period Ending March 31, 2023 in the  
28 form lodged concurrently with this Petition after expiration of the objection period.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Dated this 31<sup>st</sup> day of May, 2023.

**FAEGRE DRINKER BIDDLE & REATH LLP**

By: /s/ Joel Glover (#034018)  
Joel A. Glover  
*Attorneys for Receiver*

COPY of the foregoing mailed this  
31<sup>st</sup> day of May, 2023 to the  
attached Master Service List

/s/ Michelle Cline  
Michelle Cline

1 SUPERIOR COURT OF ARIZONA

2 COUNTY OF MARICOPA

3  
4 No. CV2016-011872 (Assigned to The Honorable Dewain Fox)

5 **MASTER SERVICE LIST**

6 Barbara D. Richardson, Receiver  
7 The Arizona Department of Insurance  
8 and Financial Institutions  
9 100 North 15th Avenue, #102  
Phoenix, Arizona 85007  
(Per request, distribution by email only to [Liane.Kido@difi.az.gov](mailto:Liane.Kido@difi.az.gov).)

10 Liane Kido, Deputy Receiver  
11 Arizona Department of Insurance  
12 100 North 15th Avenue, #102  
Phoenix, Arizona 85007  
(Per request, distribution by email only to [Liane.Kido@difi.az.gov](mailto:Liane.Kido@difi.az.gov).)

13 Lynette Evans  
14 Public Law Section  
15 Office of the Attorney General  
2005 N. Central Avenue  
16 Phoenix, AZ 85004  
*Attorneys for Arizona Department of Insurance*

17 Richard G. Erickson  
18 Robert F. Kethcart  
19 Snell & Wilmer L.L.P.  
20 One Arizona Center  
400 East Van Buren  
Phoenix, Arizona 85004  
*Attorneys for Defendants*

22 Larry Aldrich, Executive Chairman  
23 Employers Health Alliance of Arizona  
24 7520 East McLellan Lane  
Scottsdale, Arizona 85250

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Christophe Burusco  
Sidley Austin LLP  
555 West 5th Street, 40th Floor  
Los Angeles, California 90013  
*Attorneys for Care1st Health Plan Administrative Services, Inc.*

Matthew A. Clemente  
Sidley Austin LLP  
One South Dearborn  
Chicago, Illinois 60603  
*Attorneys for Care1st Health Plan Administrative Services, Inc.*

Lori Nestor, Executive Director  
Arizona Life & Disability  
Insurance Guaranty Fund  
100 N. 15th Avenue, Suite 261  
Phoenix, AZ 85007  
(Per request, distribution by email only to [Lori.Nestor@difi.az.gov](mailto:Lori.Nestor@difi.az.gov).)

Darren Ellingson  
Special Deputy Receiver  
3212 N. 70th Street, Unit 1007  
Scottsdale, Arizona 85251  
(Per request, distribution by email only to [dellingson@ellingsonassociates.com](mailto:dellingson@ellingsonassociates.com))

Banner Health  
Patient Financial Services  
Attn: Anna Rosalez, Manager  
525 West Brown Road, Third Floor  
Mesa, Arizona 85201

S. David Childers  
Kutak Rock LLP  
8601 North Scottsdale Road, Suite 300  
Scottsdale, Arizona 85253

Debbie Bailey  
Cactus Children's Clinic, PC  
5940 West Union Hills Drive  
Suite D100  
Glendale, Arizona 85308

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Monica Gaspari  
Billing Office Supervisor  
Pima Heart Physicians  
3709 North Campbell Avenue  
Suite 201  
Tucson, Arizona 85719

United States Department of Justice  
40 North Central Avenue, #1800  
Phoenix, Arizona 85004

U.S. Department of Justice  
950 Pennsylvania Avenue, NW  
Washington, DC 20530

United States Attorney General  
U.S. Department of Justice  
950 Pennsylvania Avenue, NW  
Washington, DC 20530

Sinead Baldwin  
1200 Brickell Avenue  
PH 2000  
Miami, Florida 33131  
*Attorneys for HealthSouth Rehabilitation Hospital*

Jill Wright  
Parallon  
1100 Charlotte Avenue  
Suite 1600  
Nashville, Tennessee 37203

Susan Sweat  
Ambulance Billing Office Supervisor  
Bullhead City Fire Department  
1260 Hancock Road  
Bullhead City, Arizona 86442