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6 Attorneys for Receiver

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8 SUPERIOR COURT OF ARIZONA
9 COUNTY OF MARICOPA

10 STATE OF ARIZONA, *ex rel.*
11 BARBARA D. RICHARDSON, Executive
Deputy 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

18 Defendants.

No. CV2016-011872

PETITION NO. 58

**PETITION TO ACCEPT TWENTY-
EIGHTH STATUS REPORT FOR
THE PERIOD ENDING
SEPTEMBER 30, 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. 58 to Accept Twenty-Eighth Status Report for the Period Ending September
25 30, 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 liquidation, including identifying assets, claims and liabilities on a liquidation basis. As
2 part of the accounting work, the Receiver continued to implement and account for the
3 Receivership Liquidation, the Setoff involving CMS, and the Return of Excess Premiums,
4 among other things.

5 **Summary of Payments**

6 5. Legal Counsel. During the reporting period, the total amounts (fees and
7 expenses) that have been paid to Faegre Drinker Biddle & Reath LLP as legal counsel are
8 \$3,783.00 for Meritus Mutual and \$3,783.00 for MHP for a combined amount of
9 \$7,586.00. Work was performed and invoices were submitted for additional services and
10 amounts during the reporting period but not paid until after September 30, 2023. Because
11 of the timing, those payments will be referenced in the next status report.

12 6. Special Deputy Receiver. During the reporting period, the total amounts
13 (fees and expenses) that have been paid to the Special Deputy Receiver are \$5,550.00 for
14 Meritus Mutual and \$5,550.00 for MHP for a combined amount of \$11,100.00. Work was
15 performed and invoices were submitted for additional services and amounts during the
16 reporting period but not paid until after September 30, 2023. Because of the timing, those
17 payments will be referenced in the next status report.

18 7. Regulatory Services Group. During the reporting period, no payments were
19 made to the Regulatory Services Group. Work may have been performed and invoices
20 submitted for additional services and amounts during the reporting period but not paid
21 until after September 30, 2023. Because of the timing, those payments, if any, would be
22 referenced in the next status report.

23 WHEREFORE, the Receiver requests that the Court enter the Order re Petition
24 No. 58 Accepting Twenty-Eighth Status Report for the Period Ending September 30, 2023
25 in the form lodged concurrently with this Petition after expiration of the objection period.
26
27
28

1 Dated this 5th day of December, 2023.

2 **FAEGRE DRINKER BIDDLE & REATH LLP**

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

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7
8 COPY of the foregoing mailed this
9
10 5th day of December, 2023 to the
11 attached Master Service List

12 /s/ Michelle Cline
13 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**

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8 and Financial Institutions
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