

1 **FAEGRE DRINKER BIDDLE & REATH LLP**
1144 15th 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
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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
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. 60

**PETITION TO ACCEPT TWENTY-
NINTH STATUS REPORT FOR THE
PERIOD ENDING
DECEMBER 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. 60 to Accept Twenty-Ninth Status Report for the Period Ending December 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 c. Accounting Services and General Accounting and Administrative.

2 The Receiver continued additional work on the accounting for the Meritus Companies in
3 liquidation, including identifying assets, claims and liabilities on a liquidation basis. As
4 part of the accounting work, the Receiver continued to implement and account for the
5 Receivership Liquidation, the Setoff involving CMS, and the Return of Excess Premiums,
6 among other things.

7 **Summary of Payments**

8 5. Legal Counsel. During the reporting period, the total amounts (fees and
9 expenses) that have been paid to Faegre Drinker Biddle & Reath LLP as legal counsel are
10 \$582.00 for Meritus Mutual and \$582.00 for MHP for a combined amount of \$1,164.00.
11 Work was performed and invoices were submitted for additional services and amounts
12 during the reporting period but not paid until after December 31, 2023. Because of the
13 timing, those payments will be referenced in the next status report.

14 6. Special Deputy Receiver. During the reporting period, the total amounts
15 (fees and expenses) that have been paid to the Special Deputy Receiver are \$3,480.00 for
16 Meritus Mutual and \$3,480.00 for MHP for a combined amount of \$6,960.00. Work was
17 performed and invoices were submitted for additional services and amounts during the
18 reporting period but not paid until after December 31, 2023. Because of the timing, those
19 payments will be referenced in the next status report.

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

25 WHEREFORE, the Receiver requests that the Court enter the Order re Petition
26 No. 60 Accepting Twenty-Ninth Status Report for the Period Ending December 31, 2023
27 in the form lodged concurrently with this Petition after expiration of the objection period.
28

1 Dated this 6th day of February, 2024.

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 6th day of February, 2024 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**

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.)

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.)

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 (Per request, distribution by email only to Lynette.Evans@azag.gov.)

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

22
23 Larry Aldrich, Executive Chairman
Employers Health Alliance of Arizona
24 7520 East McLellan Lane
Scottsdale, Arizona 85250
25
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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.)

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

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

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

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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