

FAEGRE DRINKER BIDDLE & REATH LLP
1144 15th Street, Suite 3400
Denver, Colorado 80202

Joel A. Glover (State Bar No. 034018)
Direct Dial: 303.607.3648
Direct Fax: 303.607.3600
Email: Joel.Glover@Faegredrinker.com

Attorneys for Receiver

SUPERIOR COURT OF ARIZONA
COUNTY OF MARICOPA

STATE OF ARIZONA, *ex rel.*
BARBARA RICHARDSON, Executive
Deputy Director of Insurance,

Plaintiff,

vs.

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

Defendants.

No. CV2016-011872

PETITION NO. 59

**SUBMISSION OF SUPPLEMENTAL
DECLARATION OF SPECIAL
DEPUTY RECEIVER REPORTING
ON CLAIMS ADJUDICATION
PROCESS**

(Assigned to The Honorable
Dewain Fox)

Darren Ellingson, in his capacity as the Special Deputy Receiver of Compass Cooperative Mutual Health Network, Inc. doing business as Meritus Mutual Health Partners (“Meritus Mutual”) and Compass Cooperative Health Plan, Inc. dba Meritus Health Partners (“MHP”) (collectively referred to as the “Meritus Companies”), appointed pursuant to A.R.S. § 20-611, *et seq.*, hereby submits Petition No. 59, the Petition to Approve Receiver’s Adjudication of Claims.

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

2. In an Order dated March 8, 2017, this Court issued its Order Re: Petition No. 7, Order Approving Liquidation Plan.

3. In an Order January 16, 2024, this Court approved Petition No. 59, the Receiver's Adjudication of Claims.

4. The specific steps required by the Court Order have been implemented by the Receiver as detailed in the attached Supplemental Declaration of Special Deputy Receiver Reporting on Claims Adjudication Process.

WHEREFORE, the Receiver submits the Supplemental Declaration of Special Deputy Receiver Reporting on Claims Adjudication Process as attached hereto.

Dated this 3rd day of April 2024.

FAEGRE DRINKER BIDDLE & REATH LLP

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

COPY of the foregoing mailed this
3rd day of April, 2024 to the
attached Master Service List

/s/ Michelle Cline
Michelle Cline

SUPERIOR COURT OF ARIZONA

COUNTY OF MARICOPA

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

MASTER SERVICE LIST

Executive Deputy Director Barbara Richardson, Receiver
The Arizona Department of Insurance
and Financial Institutions
100 North 15th Avenue, #102
Phoenix, Arizona 85007
(Per request, distribution by email only to Liane.Kido@difi.az.gov.)

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

Lynette Evans
Public Law Section
Office of the Attorney General
2005 N. Central Avenue
Phoenix, AZ 85004
Attorneys for Arizona Department of Insurance
(Per request, distribution by email only to Lynette.Evans@azag.gov.)

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

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

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

1 Monica Gaspari
2 Billing Office Supervisor
3 Pima Heart Physicians
4 3709 North Campbell Avenue
Suite 201
Tucson, Arizona 85719

5 United States Department of Justice
6 40 North Central Avenue, #1800
Phoenix, Arizona 85004

7 U.S. Department of Justice
8 950 Pennsylvania Avenue, NW
9 Washington, DC 20530

10 United States Attorney General
11 U.S. Department of Justice
12 950 Pennsylvania Avenue, NW
Washington, DC 20530

13 Sinead Baldwin
14 1200 Brickell Avenue
PH 2000
15 Miami, Florida 33131
Attorneys for HealthSouth Rehabilitation Hospital

16 Jill Wright
17 Parallon
18 1100 Charlotte Avenue
Suite 1600
Nashville, Tennessee 37203

19 Susan Sweat
20 Ambulance Billing Office Supervisor
21 Bullhead City Fire Department
22 1260 Hancock Road
Bullhead City, Arizona 86442

1 **FAEGRE DRINKER BIDDLE & REATH LLP**

2 1144 15th Street, Suite 3400
3 Denver, Colorado 80202

4 **Joel A. Glover** (State Bar No. 034018)
5 Direct Dial: 303.607.3648
6 Direct Fax: 303.607.3600
7 Email: Joel.Glover@Faegredrinker.com

8 Attorneys for Receiver

9
10 **SUPERIOR COURT OF ARIZONA**
11 **COUNTY OF MARICOPA**

12 **STATE OF ARIZONA, *ex rel.***
13 **BARBARA RICHARDSON, Executive**
14 **Deputy Director of Insurance,**

15 **Plaintiff,**

16 **vs.**

17 **COMPASS COOPERATIVE MUTUAL**
18 **HEALTH NETWORK, INC., dba MERITUS**
19 **MUTUAL HEALTH PARTNERS, an**
20 **Arizona corporation; and**
21 **COMPASS COOPERATIVE HEALTH**
22 **PLAN, INC., dba MERITUS HEALTH**
23 **PARTNERS, an Arizona corporation,**

24 **Defendants.**

No. CV2016-011872

PETITION NO. 59

SUPPLEMENTAL DECLARATION
OF SPECIAL DEPUTY RECEIVER
REPORTING ON CLAIMS
ADJUDICATION PROCESS

(Assigned to The Honorable
Dewain Fox)

25 By signing below, I, Darren Ellingson, state to the Court under penalty of law, that
26 the information stated on these pages is true and correct to the best of my knowledge and
27 belief.

28 1. I am over eighteen years of age, and I have personal knowledge of the facts
herein. I acquired my personal knowledge in my capacity as Special Deputy Receiver of
Meritus Mutual Health Partners, in liquidation ("Meritus Mutual") and of Meritus Health
Partners, in liquidation ("MHP"). I have served as Special Deputy Receiver since the
commencement of the Meritus Mutual and MHP receiverships and, in that capacity, I am
familiar with and have personal knowledge of the books and records of Meritus Mutual
and MHP. In acquiring my personal knowledge, I relied upon work performed by one or

1 more persons that worked under my direction with respect to the Meritus Mutual and MHP
2 receiverships.

3 2. The Court's Order entered January 16, 2024 Approving Petition No. 59, the
4 Receiver's Adjudication of Claims, set forth specific remaining steps that have been
5 implemented by or on behalf of the Receiver. Specifically:

6 a. Declaration Exhibits 3 and 4 were approved by this Court and included
7 language for providing notice to Claimants regarding the Receiver's Claims Adjudication.

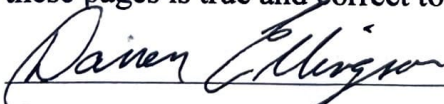
8 b. On or before February 1, 2024, the Receiver sent to each claimant a
9 completed Notice of Determination in the form of Declarations Exhibits 3 and 4, providing
10 notice of the Court's Order regarding the Receiver's Claim Adjudication and the
11 claimant's right to object within thirty (30) days, that is on or before March 1, 2024.

12 c. No objections were received by the required deadline of March 1, 2024.
13 Likewise, no untimely objections have been received as of the date hereof.

14 d. A relatively small number of responses (fewer than 20) were received from
15 providers asking for additional claim information, which information was provided
16 without incident or objection.

17 3. To the extent that there are undeliverable and/or return to sender notices received in
18 response to notices sent to specific Claimants, then as provided for in Paragraph 6 of
19 Petition No. 59, Petition to Approve Receiver's Adjudication of Claims, the specific
20 Adjudication of Claims attributable to that Claimant shall be deemed unopposed. The
21 Receiver will continue to seek to confirm the correct contact information before any
22 payments would be made and if the Claimant cannot be located then the respective
23 amounts will be handled as unclaimed property under Arizona law subject to further order
24 of this Court.

25 By signing below, I state to the Court, under penalty of law, that the information stated on
26 these pages is true and correct to the best of my knowledge and belief.

27 
28 Darren Ellingson, Special Deputy Receiver

Date: 4/2/2024