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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. 64

**PETITION TO ACCEPT THIRTY-
SECOND STATUS REPORT FOR
THE PERIOD ENDING
SEPTEMBER 30, 2024**

(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. doing business as
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. 64 to Accept Thirty-Second Status Report for the Period Ending
25 September 30, 2024 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 d. Final Accounting. Preparation of the final accounting and order
5 closing the estate subject to certain remaining steps is ongoing.

6 **Summary of Payments**

7 5. Legal Counsel. During the reporting period, the total amounts (fees and
8 expenses) that have been paid to Faegre Drinker Biddle & Reath LLP as legal counsel are
9 \$5,823.75 for Meritus Mutual and \$5,786.75 for MHP for a combined amount of
10 \$11,610.50. Work was performed and invoices were submitted for additional services and
11 amounts during the reporting period but not paid until after September 30, 2024. Because
12 of the timing, those 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 \$1,955.00 for
15 Meritus Mutual and \$1,955.00 for MHP for a combined amount of \$3,910.00. Work was
16 performed and invoices were submitted for additional services and amounts during the
17 reporting period but not paid until after September 30, 2024. Because of the timing, those
18 payments will be referenced in the next status report.

19 7. Regulatory Services Group. During the reporting period, no payments were
20 made to the Regulatory Services Group. Work may have been performed and invoices
21 submitted for additional services and amounts during the reporting period but not paid
22 until after September 30, 2024. Because of the timing, those payments, if any, would be
23 referenced in the next status report.

24 WHEREFORE, the Receiver requests that the Court enter the Order re Petition
25 No. 64 Accepting Thirty-Second Status Report for the Period Ending September 30, 2024
26 in the form lodged concurrently with this Petition after expiration of the objection period.
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Dated this 31st day of October, 2024.

FAEGRE DRINKER BIDDLE & REATH LLP

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

COPY of the foregoing mailed this
31st day of October, 2024 to the
attached Master Service List

/s/ Christine Goyer
Christine Goyer

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
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