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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. 66

**PETITION TO ACCEPT THIRTY-
THIRD STATUS REPORT FOR THE
PERIOD ENDING DECEMBER 31,
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. 66 to Accept Thirty-Third Status Report for the Period Ending
25 December 31, 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 d. 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 e. Final Accounting. Preparation of the final accounting and order

8 closing the estate subject to certain remaining steps is ongoing.

9 **Summary of Payments**

10 5. Legal Counsel. During the reporting period, the total amounts (fees and
11 expenses) that have been paid to Faegre Drinker Biddle & Reath LLP as legal counsel are
12 \$2,961.75 for Meritus Mutual and \$3,040.25 for MHP for a combined amount of
13 \$6,002.00. Work was performed and invoices were submitted for additional services and
14 amounts during the reporting period but not paid until after December 31, 2024. Because
15 of the timing, those payments will be referenced in the next status report.

16 6. Special Deputy Receiver. During the reporting period, the total amounts
17 (fees and expenses) that have been paid to the Special Deputy Receiver are \$7,065.00 for
18 Meritus Mutual and \$7,190.00 for MHP for a combined amount of \$14,255.00. Work was
19 performed and invoices were submitted for additional services and amounts during the
20 reporting period but not paid until after December 31, 2024. Because of the timing, those
21 payments will be referenced in the next status report.

22 7. Regulatory Services Group. During the reporting period, the total amounts
23 (fees and expenses) that have been paid to the Regulatory Services Group are \$780.00 for
24 Meritus Mutual and \$780.00 for MHP for a combined amount of \$1,560.00. To the extent
25 work was performed and invoices were submitted for additional services and amounts
26 during the reporting period but not paid until after December 31, 2024, those payments
27 will be referenced in the next status report.

1 WHEREFORE, the Receiver requests that the Court enter the Order re Petition
2 No. 66 Accepting Thirty-Third Status Report for the Period Ending December 31, 2024 in
3 the form lodged concurrently with this Petition after expiration of the objection period.

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7 Dated this 13th day of March, 2025.

8 **FAEGRE DRINKER BIDDLE & REATH LLP**

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

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13
14 COPY of the foregoing mailed this
15 13th day of March, 2025 to the
16 attached Master Service List

17 /s/ Christine Goyer
18 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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