

Case No. _____

IN THE SUPREME COURT OF NEVADA

UNITE HERE HEALTH, a multi-employer health and welfare ERISA Section 3(37); and NEVADA HEALTH SOLUTIONS, LLC, a Nevada limited liability company,

Petitioners,

vs.

EIGHTH JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA, IN
AND FOR THE COUNTY OF CLARK, THE HONORABLE TARA CLARK
NEWBERRY, DISTRICT COURT JUDGE,

Respondent,

- and -

STATE OF NEVADA EX REL. COMMISSIONER OF INSURANCE,
BARBARA D. RICHARDSON, IN HER OFFICIAL CAPACITY AS
STATUTORY RECEIVER FOR DELINQUENT DOMESTIC INSURER,
NEVADA HEALTH CO-OP; and GREENBERG TRAURIG, LLP,

Real Parties in Interest.

District Court Case No. A-15-725244-C, Department XXI

**APPENDIX TO PETITION FOR EXTRAORDINARY WRIT RELIEF
VOLUME 4 OF 19**

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February 25, 2021

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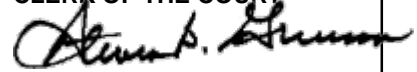
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**IN THE EIGHTH JUDICIAL DISTRICT COURT
CLARK COUNTY, NEVADA**

STATE OF NEVADA, EX REL.)	Case No. A-15-725244-C
COMMISSIONER OF INSURANCE, IN HER)	
OFFICIAL CAPACITY AS STATUTORY)	Dept. No. 1
RECEIVER FOR DELINQUENT DOMESTIC)	
INSURER,)	
)	
Plaintiff,)	
)	
vs.)	
)	
NEVADA HEALTH CO-OP,)	
)	
Defendant.)	
)	
)	
)	

NINTH STATUS REPORT

COME NOW, Commissioner of Insurance Barbara D. Richardson in her capacity as Receiver of Nevada Health CO-OP ("NHC," or the "CO-OP"), and CANTILO & BENNETT, L.L.P., Special Deputy Receiver ("SDR" - SDR and the Commissioner as Receiver are referred to collectively herein as "Receiver"), and file this Ninth Status Report in the above-captioned receivership.

I. INTRODUCTION AND HISTORICAL BACKGROUND

The CO-OP is a state-licensed health insurer, formed in 2012 as a Health Maintenance Organization (“HMO”), with a Certificate of Authority granted by the State of Nevada Division of Insurance effective January 2, 2013. NHC is an Internal Revenue Code 501(c)(29) Qualified Non-Profit Health Insurance Issuer, entitled to tax exemption by the Internal Revenue Service. NHC was formed under a provision of the Patient Protection and Affordable Care Act (“ACA”) providing for the formation of Consumer Operated and Oriented Plans. Having received from the Centers for Medicare and Medicaid Services (“CMS”) of the United States Department of Health and Human Services (“HHS”) a start-up loan of \$17,080,047, and a “solvency” loan of \$48,820,349, NHC was required to operate as a non-profit, consumer-driven health insurance issuer for the benefit of the public. The CO-OP’s primary business was to provide ACA-compliant health coverage to residents of Nevada, and it operated its business for the benefit of Nevadans within the state, save for certain arrangements to provide nationwide health coverage to Nevadans traveling outside the state in certain circumstances. NHC began selling products on and off the Silver State Health Insurance Exchange (the “Exchange”) on January 1, 2014. Its products include individual, small group, and large group managed care coverages.

On October 1, 2015, this Court issued its Order Appointing the Acting Insurance Commissioner, Amy L. Parks as Temporary Receiver of NHC Pending Further Orders of the Court and Granting Temporary Injunctive Relief Pursuant to NRS 696B.270 (the “Temporary Receivership Order”). Further, on October 14, 2015, the Receivership Court entered its Permanent Injunction and Order Appointing Commissioner as Permanent Receiver of Nevada Health CO-OP (the “Permanent Receivership Order”), appointing the law firm of CANTILO & BENNETT, L.L.P. as SDR of NHC, in accordance with Chapter 696B of the Nevada Revised Statutes.

Via a Notice of Substitution of Receiver dated April 6, 2016, Ms. Joanna N. Grigoriev informed interested parties of the substitution of Commissioner Barbara D. Richardson, in place and stead of former Acting Commissioner Amy L. Parks, as the Receiver of NHC. This

1 substitution of Receiver was subsequent to Commissioner Richardson's appointment as
2 Commissioner of Insurance for the State of Nevada.

3 This Court, through its Final Order Finding and Declaring Nevada Health CO-OP to be
4 Insolvent and Placing Nevada Health CO-OP into Liquidation (the "Final Order") dated
5 September 20, 2016, adjudged NHC to be insolvent on grounds that it is unable to meet
6 obligations as they mature. The Final Order also authorized the Receiver to liquidate the
7 business of NHC and wind up its ceased operations pursuant to applicable Nevada law. The
8 Receiver has since transitioned the receivership estate from rehabilitation to liquidation.

9 The Receiver continues to file quarterly status reports as ordered by this Court.

10 **II. RECEIVERSHIP ADMINISTRATION**

11 **Receivership Administrative Services and Oversight**

12 CANTILO & BENNETT, L.L.P., as SDR of NHC, manages the receivership estate and
13 conducts its affairs. PALOMAR FINANCIAL, LC ("Palomar"), an affiliate of the SDR, performs
14 administration, information technology, and other related services for the Receiver under the
15 supervision of the SDR. The Receiver has included an informational copy, as Exhibit 1 to this
16 Ninth Status Report, of the invoices paid to the SDR and Palomar since the last status report
17 to this Court.

18 **Resolution of Outstanding Receivership Matters**

19 ***Pre-Liquidation Claims Adjudications and Claims Solidification***

20 NHC's staff continues the process of claims adjudications. At this point, new claims
21 are only accepted for review if the claimant can show proof of timely filing (*i.e.*, proof that the
22 claim was previously submitted in advance of the Receiver's Claims Filing Deadline).

23 The Receiver continues to coordinate with those plan members who were reported to
24 collection agencies by healthcare providers and facilities, or who are currently being sought
25 for payment based on the receivership estate's obligations. In cases where collection efforts
26 have taken place in violation of the Permanent Receivership Order, NHC staff members
27 contact those providers and any related collection agencies to inform them of the Permanent
28 Receivership Order and its moratorium on the payment of health claims. When necessary,

1 the SDR has also sent letters to such providers to advise them that their direct collection
2 actions violate the Permanent Receivership Order, and may justify receivership remedies
3 against them.

4 ***Continuation of Mandatory Regulatory Reporting to CMS***

5 As explained in prior status reports, the Receiver and SDR have submitted essential
6 data for the various regulatory reporting processes required for CO-OPs under the ACA, and
7 NHC fulfills ongoing requirements as may be applicable. The Receiver is working to resolve
8 CMS matters so that the maximum amounts are collected under the various federal
9 receivables programs.

10 NHC is owed payments relating to several such programs, including: Cost Sharing
11 Reduction ("CSR") Reconciliation, Federal Transitional Reinsurance, Risk Adjustment, and
12 Risk Corridors. The expected receipt of these federal receivables is a key part of any future
13 claim payments by NHC. The non-receipt of substantially all federal accounts payable for
14 plan year 2015, and a material portion of accounts payable for plan year 2014, has greatly
15 diminished NHC's assets and, therefore, its claims-paying ability.

16 CMS has maintained the position that any monies deemed owed to NHC (*i.e.*, the
17 receivership estate) are to be set off against the amounts CMS asserts it is owed under the
18 start-up loan to NHC. CMS has so far made offsets against accounts payable to NHC for the
19 outstanding balance of the start-up loan. The SDR sent a letter to CMS to request a detailed,
20 cumulative accounting of all offsets applied to date so that the SDR can review CMS'
21 accounting of charges and offsets applied to NHC's accounts payable. The SDR has
22 received such an accounting and is currently reviewing it in detail.

23 ***Updates as to Current Status of Regulatory Submissions Projects***

24 NHC Risk Adjustment and Federal Transitional Reinsurance data was submitted to
25 CMS on May 2, 2016. On June 30, 2016, CMS released its Summary Report on
26 Transactional Reinsurance and Permanent Risk Adjustment Transfers for the 2015 Benefit
27 Year.¹ Per the report, for coverage year 2015, the CO-OP is owed a Federal Transitional
28

¹ Available at: <https://www.cms.gov/CCIIO/Programs-and-Initiatives/Premium-Stabilization-Programs/Downloads/June-30-2016-RA-and-RI-Summary-Report-5CR-063016.pdf>.

1 Reinsurance payment of \$8,842,009.69 and net Risk Adjustment transfer of \$4,532,560.29.
2 The 2015 Federal Transitional Reinsurance payment amount increased by \$4,601.65 to
3 \$8,846,611.34 in the December 6, 2016, Amendment to the Summary Report on Transitional
4 Reinsurance Payments and Permanent Risk Adjustment Transfers for the 2015 Benefit
5 Year.²

6 In 2016, the reporting related to the CSR Reconciliation program resulted in a net
7 amount owed by NHC to CMS of \$3,579,359.65 for 2014 and 2015 CSRs. At the beginning
8 of June 2017, the SDR submitted amended filings to CMS of the 2014 and 2015 CSRs,
9 resulting in NHC owing an adjusted balance to CMS of \$482,948.54 rather than
10 \$3,579,359.65—or a reduction in NHC liability of \$3,096,411.11. CMS has accepted this
11 adjustment.

12 Regarding the 2015 Risk Corridors, CMS has confirmed that NHC is owed \$29.9
13 million for its individual market and \$3.75 million for its small group market.³ However, CMS
14 claims to have no funds available to pay 2015 Risk Corridors at this time, and it has
15 announced that all 2015 and 2016 benefit year collections will be used towards remaining
16 2014 benefit year risk corridors balances.⁴ Due to a shortfall in risk corridor collections, CMS
17 was initially able to pay only a prorated 12.6% of all 2014 Risk Corridors payments due to
18 issuers. In November 2016, CMS announced an additional expected payment toward NHC's
19 2014 Risk Corridor of \$355,443.99. Likewise, in November 2017, CMS announced an
20 additional expected payment toward NHC's 2014 Risk Corridor of \$93,079.06. The CO-OP is
21 still owed over \$9.4 million for unpaid 2014 Risk Corridors.

22 The SDR has previously disputed with CMS the balance due NHC for Advance
23 Premium Tax Credits ("APTC"). CMS recently provided clarification and detailed materials in
24 support of its position, which the SDR is still reviewing.

25 ² Available at: https://www.cms.gov/CCIIO/Programs-and-Initiatives/Premium-Stabilization-Programs/Downloads/DDC_RevisedJune30thReport_v2_5CR_120516.pdf.

26 ³ DEPT OF HEALTH & HUMAN SERVICES & CENTERS FOR MEDICARE & MEDICAID SERVICES ("CMS"),
27 CCIIO MEMORANDUM, RISK CORRIDORS PAYMENT AND CHARGE AMOUNTS FOR THE 2015 BENEFIT
YEAR (November 18, 2016) (available at <https://www.cms.gov/CCIIO/Resources/Regulations-and-Guidance/Downloads/2015-RC-Issuer-level-Report-11-18-16-FINAL-v2.pdf>).

28 ⁴ Id.; CMS, CCIIO MEMORANDUM, RISK CORRIDORS PAYMENT AND CHARGE AMOUNTS FOR THE 2016
BENEFIT YEAR (November 15, 2017) (available at <https://www.cms.gov/CCIIO/Programs-and-Initiatives/Premium-Stabilization-Programs/Downloads/Risk-Corridors-Amounts-2016.pdf>).

Use of Third-Party Contractors as Part of Business Operations

The Receiver utilizes the services of several third-party contractors that had been engaged before commencement of the receivership, and some of them were engaged after the receivership commenced to assist in management of NHC's affairs.

The following is a list of independent contractors currently assisting the receivership:

1. Eldorado, a division of Mphasis Corporation, to provide a hosting service for claims data and information.
2. The Jacobson Group, to provide claims adjustment and customer service staffing support.
3. Redcard, to perform check processing and delivery to health care providers, and delivery of Explanation of Benefit disclosures to providers and plan members.
4. ADP, to provide payroll support and processing for employee compensation and benefits.

Internal Administrative Matters Related to Wind Down

NHC maintains staff to address calls from interested parties regarding the proof of claim ("POC") process, other claim matters, and the collection of assets for the receivership. The Receiver has refunded premium overpayments to members since such overpayments were not funds to which NHC was entitled and are therefore outside the normal claim process. The Receiver believes that substantially all premium refunds have been processed and paid.

The wind down of NHC's 401(k) retirement plan continues, with the SDR having submitted to the Internal Revenue Service the Form 5310 for the retirement plan wind down. The Form 5310 filing sought a tax determination letter that would permit the distribution of 401(k) assets to employees without the need for an expensive and time-consuming audit. On September 21, 2017, the SDR received notice from the IRS via a letter dated September 14, 2017, that the termination of the 401(k) "doesn't affect its qualification for federal tax purposes." This favorable determination having been obtained, the SDR has instructed its 401(k) third-party administrator to coordinate with the investment company in custody of the

1 retirement plan assets to begin the process of de-conversion as part of the wind down,
2 making sure that all employee terminations which occurred within and subsequent to 2015 be
3 treated as events which vest 401(k) participants fully in the amounts held on their accounts.
4 All former retirement plan participants shall receive notices from the investment company with
5 mandatory disclosures concerning their funds, and instructions for effecting a transfer to an
6 alternate company.

7 The Receiver also maintains an office for NHC's essential office staff.⁵

8 **Commencement of Action Against Various Professionals and Other Firms Who**
9 **Performed Services for and on Behalf of NHC**

10 On August 25, 2017, Counsel for the Receiver filed in Clark County District Court a
11 complaint (Case No. A-17-760558-C in Department No. 18) against various persons, third-
12 party vendors, and professional service firms which are alleged to have contributed to NHC's
13 current hazardous financial condition by, among other things, failing to adhere to applicable
14 standards of professional care and requirements imposed by law, misrepresentation
15 concerning quality and standard of care for services performed, and breaches of contract,
16 duty, and implied covenants of good faith and fair dealing.

17 The complaint names, among others, NHC's former actuaries, accountants, auditors,
18 and providers of certain business operations and utilization review services, as well as those
19 individuals who specifically performed, or who were in the role of supervising the
20 performance of, those services. The Complaint also names several of NHC's former
21 directors and executive management.

22 On September 14, 2017, Counsel for the Receiver filed with this Court a Motion to
23 Coordinate Cases, seeking a coordination of that case and the overarching receivership
24 action being supervised by this Court on grounds that the case constitutes an asset recovery
25 action, an integral part of the resolution of the receivership that merits continued supervision
26 by this Court. This motion was set for in chambers hearing on October 19, 2017, but was
27 continued to November 7, 2017. An opposition to the Motion to Coordinate Cases was filed
28 _____

⁵ Currently, NHC maintains fifteen full-time and two part-time employees.

1 by Milliman, and subsequently joined by Nevada Health Solutions, InsureMonkey, Larson,
2 and many of the former directors and officers of NHC. By an order dated December 8, 2017,
3 this Court denied Plaintiff's Motion to Coordinate Cases.

4 A request to reassign this case to the Business Court on the grounds that the action
5 involves the alleged commission of torts related to business was filed September 28, 2017,
6 and Judge Nancy Alf was assigned. Judge Kathleen Delaney has now been assigned the
7 case subsequent to Judge Alf being subject to a peremptory challenge dated November 9,
8 2017.

9 Milliman filed its Motion to Compel Arbitration on November 6, 2017, a motion which
10 was challenged by the December 11, 2017, filing of Plaintiff's Opposition to Milliman's Motion
11 to Compel Arbitration. The hearing to address this issue was scheduled for December 12,
12 2017, but it has now been reset for a hearing on January 9, 2018.

13 Millennium filed a Motion to Dismiss on October 26, 2017, and an opposition to such
14 motion was filed by the Receiver on December 18, 2017. The hearing on that Motion to
15 Dismiss was scheduled for December 12, 2017, but this was later rescheduled to January 9,
16 2018, on stipulation of the parties.

17 **Commencement of Action Against CMS to Settle Questions of Setoff as to Mutual**
18 **Obligations**

19 On March 16, 2017, Counsel for the Receiver filed in the United States District Court
20 for the District of Nevada a Complaint and Demand for Jury Trial (the "Complaint") against
21 the United States Department of Health and Human Services, the Centers for Medicare and
22 Medicaid Services, Thomas E. Price, M.D. in his capacity as the U.S. Secretary of Health and
23 Human Services, and the United States (the "Defendants"). Through this Complaint, the
24 Receiver seeks both judicial review of a final agency action made by Defendants and a
25 declaratory judgment as to Defendants' right to set off any monies claimed against NHC
26 through funds that HHS/CMS is statutorily obligated to pay to NHC. As has been reported to
27 this Court on several occasions, Defendants (via CMS) have provided notice to the Receiver
28 of their termination of the underlying Loan Agreement through which the CO-OP received its
funds under the ACA, declaring those loans immediately due and payable. Further, on March

6, 2016, HHS/CMS stated that an “administrative hold” on payables due to NHC had been implemented at the request of the U.S. Department of Justice. As part of this chain of events, on September 29, 2016, HHS/CMS claimed that approximately \$7 million had been offset against funds payable to NHC from the outstanding amount of the start-up loan, and prospectively asserted its “right” to offset future payables. As noted above, CMS has since notified the SDR on several occasions of additional offsets, and the SDR has determined certain discrepancies in CMS’ accounting. Consequently, the SDR has requested, in writing, that CMS provide a cumulative accounting of all offsets and charges applied to NHC’s accounts payable to date, which CMS has provided and which is now under review.

The Complaint therefore seeks relief in the form of a declaratory judgment which holds that the federal government’s setoffs and prospective setoffs are unlawful under Nevada state reserve requirements, solvency regulations, requisite surplus note requirements, and other similar laws. As well, the Receiver seeks a declaration that both the start-up and solvency loans given to NHC are subordinated to the claims of NHC’s policyholders and subscriber members, that the debts the Defendants seek to set off lack the requirement of mutuality necessary to permit such a setoff, and that any such setoffs were and are improper.

Defendants’ Motion to Dismiss was filed in that case on June 29, 2017, asserting that the Receiver’s claim for declaratory relief fails both for lack of jurisdiction and on the merits.

A Stipulation and Order to Extend Briefing Schedule regarding that Motion to Dismiss was filed with the United States District Court for the State of Nevada, with the consent of counsel for both plaintiff and defendants, on August 8, 2017. This stipulation provides that the Receiver shall have up to and including August 28, 2017, to respond to HHS/CMS’ motion to dismiss, and HHS/CMS shall have up to and including October 4, 2017, to submit a reply brief. This Stipulation was approved via an order entered August 10, 2017.

The Receiver filed her Opposition to Motion to Dismiss on August 28, 2017. The Opposition to Motion to Dismiss, *inter alia*, asserts that not only does the Administrative Procedure Act provide a waiver of sovereign immunity which applies to this action, but that the CMS Loan Agreement contains an express waiver of sovereign immunity under its own

1 terms, insofar as that agreement specifically declares that both parties (HHS/CMS and NHC)
2 consent to the jurisdiction of the federal courts located within Nevada, and courts of appeal
3 therefrom. On October 4, 2017, HHS/CMS filed its Reply in Support of Motion to Dismiss the
4 Complaint, wherein the Court of Federal Claims was again argued to be sole jurisdiction
5 under which the suit may be adjudicated, that any monetary relief provided by that court
6 would adequately address the agency actions NHC complains of, and that sovereign
7 immunity had not been waived under the terms of the CMS Loan Agreement.

8 On December 6, 2017, Plaintiff filed its Initial Case Management Statement and
9 Scheduling Order, proposing a plan and schedule for discovery to be conducted in that case.
10 The same day, Defendants filed their Motion to Deny Plaintiff's Proposed Scheduling Order,
11 and a hearing on that motion is expected to be heard on January 22, 2018.

12 **Notice of Claim Determination to CMS**

13 In response to a POC filed by CMS against the NHC receivership estate before
14 expiration of the April 28, 2017, claims filing deadline, a notice of claim determination ("NCD")
15 was issued by the SDR to CMS on June 14, 2017, making the following claim determinations:

- 16 a. CMS claims have priority no higher than NRS § 696B.420(1)(d) ("Class D").
- 17 b. Federal law, including 31 U.S.C. § 3713, does not give CMS a claim priority
18 higher than Class D with respect to NHC's assets or in the NHC liquidation
19 proceeding.
- 20 c. Under federal and state law, including NRS 696B.440, CMS claims may not be
21 properly set off "against debts owed to NHC by the United States."
- 22 d. Any setoff of amounts claimed by the U.S., if set off against amounts owed to
23 NHC, would impermissibly elevate the U.S. claims above their statutory priority
24 level.
- 25 e. Any setoff of amounts claimed by the U.S., if set off against amounts owed to
26 NHC, would violate the NHC permanent receivership order.
- 27 f. The CMS claims are not entitled to secured creditor claim priority to the extent
28 they are subject to a set off by a claim of NHC against the United States.

- 1 g. It appears that the receivership estate has insufficient assets to pay NHC claims
2 with priority lower than Class B. Thus, the Receiver makes no determination
3 right now as to the following: (1) the merit of the CMS claim, (2) the amount
4 claimed, or (3) whether the CMS claim would have a Class D or lower priority.
- 5 h. No claim received after the NHC claims deadline, if not rendered absolute, can
6 participate in a share of NHC's assets. Thus, any later or additional claim by
7 CMS will be deemed a late-filed claim for which NHC is not liable. The
8 purported claim reservation of the United States to assert later determined
9 claims is therefore ineffective.

10 CMS was notified in the June 14, 2017, NCD that its appeal, if any, was due to be filed
11 within sixty (60) days of the notice (*i.e.*, by August 13, 2017). To date, CMS has not provided
12 any responsive appeal. Therefore, pursuant to the Receivership Appeal Procedure ("RAP"),
13 the SDR's June 14, 2017, determination is final and non-appealable.

14 **Filing in Small Claims Court by Former Member**

15 NHC was made party to an action in the Justice Court for Las Vegas Township via an
16 April 17, 2017, small claims complaint filed by a former member, Mr. Yiming Wu, regarding
17 \$4,727.74 that he claims he is owed by NHC for the CO-OP's allegedly reporting to the IRS
18 incorrect information concerning his coverage, resulting in the assessment of a penalty. The
19 complainant was advised via a letter from the receivership dated April 24, 2017, of the
20 necessity of filing a POC against the CO-OP to protect his rights against estate assets, but to
21 date such a POC has not been received. Counsel for the Receiver had filed a Motion to
22 Dismiss on jurisdictional grounds, among others, asserting that this action must be before the
23 Receivership Court to the exclusion of any other forum. Via an Order to Transfer Case filed
24 September 13, 2017, the Las Vegas Justice Court transferred the case to the Receivership
25 Court for further proceedings, pending the payment of transfer fees by the Plaintiff. As of the
26 date of filing of this Status Report, no such transfer fees have been paid by the Plaintiff. The
27 action cannot commence in the receivership court without the payment of such fees, and thus
28

1 the case remains abated until that requirement is satisfied. Efforts to reach out to Mr. Wu via
2 telephone have not been successful.

3 **IRS Penalties Assessed for Data Inaccuracies in Information Filings**

4 The SDR received a notice from the IRS dated October 2, 2017, regarding an unpaid
5 amount of \$491.98 and relating to the Form 720 (quarterly federal excise tax return). The
6 notice threatened to seize NHC's property to satisfy the amount due. The SDR has
7 contacted the IRS regarding this notice and been informed that the notice relates to interest
8 due on NHC's Patient-Centered Outcomes Research Institute ("PCORI") fees. The IRS has
9 filed a POC for this amount, and is aware that NHC is in liquidation. An IRS bankruptcy
10 specialist informed the SDR that a receivership "freeze" will be placed on this item, no seizure
11 of assets is in progress, and no additional notices should be received on this matter.

12 The SDR has received other notices from the IRS seeking to compel the payment of
13 penalties assessed against NHC regarding the submission of erroneous Form 1099 and Tax
14 Information Number data for tax years 2014 and 2015. The Receiver has written separately
15 regarding both tax years, to explain that reasonable cause to withhold the penalty exists and
16 that Treasury regulations insulate assets administered by a receivership court from seizure
17 and levy by the IRS. Regarding the 2014 penalty, the IRS requested additional documents to
18 support the SDR's request. The SDR has responded with the requested documentation and
19 awaits a decision from the IRS. Regarding the 2015 penalty, the SDR awaits a response
20 from the IRS.

21 **Resolution of POCs, Provision of NCDs, Appeals**

22 The Receiver has implemented the POC process approved by this Court in its Final
23 Order, and has already conducted general mailings and publication of necessary notices to
24 claimants and other interested parties.

25 The Claims Filing Deadline was April 28, 2017, and the SDR received 141 POCs.
26 Many of these are incomplete or unable to be adjudicated for various other reasons, and the
27 SDR has notified various claimants of claim deficiencies. The SDR will continue adjudicating
28

POCs and developing NCDs in expectation of mailing such determinations after obtaining the necessary approval from this Court.

Claims for Which There Are Currently Insufficient Assets to Pay

It does not appear now that there will be sufficient assets to pay claims beyond those assigned a Class B priority pursuant to NRS 696B.420(1)(b). The SDR has received several POCs that should be assigned to priority classes C through L, pursuant to NRS 696B.420(1)(c)-(l). In such instances, the SDR proposes to send claimants NCDs that determine the priority of their claims, which determination will be subject to appeal under the Receivership Appeal Procedure ("RAP"). To conserve the assets of the estate, and per NRS 696B.330(4), the SDR of NHC will refrain from reaching the merits of these claims until such time it appears that assets will be available for distribution to that class. If additional assets later become available for distribution to these claimants, the SDR will make a second claim determination as to the merits of each claim and notify the claimants of such determination.

Claims Asserted Against the Estate by Providers

Health care providers are not required to use the POC form to submit their claims, because NHC already has a pre-existing process for receiving and processing such claims, having thousands of such processed claims already in its claim processing system. Providers were required to use (and most did use) the pre-existing claims process to submit their claims before the Claims Filing Deadline.

The SDR will be preparing NCDs to send providers for their claims. After reporting claim determinations to the Court, the SDR will begin mailing providers' NCDs. The provider NCD will show the amount the SDR has approved to be paid for each claim, along with the member's responsibility portion of the claim—which the provider may collect from the member without violating the Permanent Receivership Order. For this reason, the member will also receive a copy of the NCD. Members and providers may appeal NCDs in accordance with the RAP.

Current Receivership Assets

The Receiver's evaluation of the assets and liabilities of the CO-OP is ongoing, and adjusted periodically to accommodate new authorized payments, receipts, and transfers. Below is an overview of some key asset matters thus far identified by the Receiver (other than those already mentioned herein):

1. Before year-end 2016, the Receiver submitted a reinsurance claim to Partner Re based on 2015 claims information. In April and May 2017, Partner Re paid the Receiver a total of \$787,352.41 in satisfaction of NHC's reinsurance claims, but ultimately adjusted this amount by \$2,196.11 in Partner Re's favor.

2. The unrestricted cash assets of the CO-OP have fluctuated with post-receivership expenses and claim payments, as well as with the Receiver's receipt of member premiums. The currently-available, unrestricted cash assets of the CO-OP as of November 30, 2017, were approximately \$6,697,978. The majority of NHC's currently available and liquid assets have been invested in a short-term bond mutual fund, with the remainder of such assets held in bank deposits.

3. The financial information of NHC in this Ninth Status Report provides estimates. NHC's financials may materially vary depending upon the estate's receipt of the promised federal receivables payments under the various ACA programs described in this report and future litigation recoverables. These figures will remain estimates until the estate receives clearer indications from CMS and the federal government as to the amount and timing of any federal payments, as well as the outcome of the recent lawsuit filed by the Receiver against CMS regarding the administrative hold and asserted rights to setoff. As mentioned, the Receiver continues work to resolve matters with CMS.

4. The Receiver is enclosing, as Exhibit 2 attached hereto, a cash flow report for NHC for the period covering the inception of the receivership through November 30, 2017. This report reflects a summary of disbursements and collections made by NHC during this period.

CONCLUSION

The Receiver has submitted this report in compliance with the Receivership Court's instructions for a status report on NHC. The Receiver requests that the Court approve this Ninth Status Report and the actions taken by the Receiver.

DATED this 5th day of January 2018.

Respectfully submitted:

Barbara D. Richardson, Commissioner of Insurance of the State of Nevada, in her Official Capacity as Statutory Receiver of Delinquent Domestic Insurer

By: /s/ CANTILO & BENNETT, L.L.P.
Special Deputy Receiver
By Its Authorized Representative
Patrick H. Cantilo

Respectfully submitted by:

/s/ Eric W. Swanis
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Nevada Bar No. 1625
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swanise@gtlaw.com

*Counsel for Barbara D. Richardson,
Commissioner of Insurance,
as the Permanent Receiver for
Nevada Health CO-OP*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on the 5th day of January 2018, and pursuant to NEFCR 9, NRCP 5(b), and EDCR 7.26, a true and correct copy of the foregoing **NINTH STATUS REPORT** was filed with the Clerk of the Court using the Odyssey eFileNV Electronic Service system and served on all parties with an email-address on record, pursuant to Administrative Order 14-2 and Rule 9 of the N.E.F.C.R.

The date and time of the electronic proof of service is in place of the date and place of deposit in the U.S. Mail.

/s/ Joyce Heilich
An employee of Greenberg Traurig, LLP

EXHIBIT “1”

CANTILO & BENNETT, L.L.P.

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September 6, 2017

BILL SUMMARY

70750 Nevada Health Co-Op ("NHC")

May 1, 2017 - May 31, 2017

<u>Matter No. and Description</u>	<u>Invoice Number</u>	<u>Fees</u>	<u>Costs</u>	<u>Total</u>
May 2017	22128- 22145	\$126,690.00	\$ 10,716.90	\$137,406.90
Totals (1)		\$126,690.00	\$10,716.90	\$137,406.90

Cantilo & Bennett, L.L.P.

**NEVADA HEALTH CO-OP
TIMEKEEPER SUMMARY REPORT
5/1/17 - 5/31/17**

		Billable Hours	Billable Rate	May 2017 Billing
1	Timekeeper - Patrick H. Cantilo	64.60	\$450.00	\$29,070.00
2	Timekeeper - Mark F. Bennett	75.75	\$375.00	\$28,406.25
3	Timekeeper - Kristen W. Johnson	115.10	\$175.00	\$20,142.50
4	Timekeeper - Josh O. Lively	165.25	\$175.00	\$28,918.75
5	Timekeeper - Nelson J. Dunlap	0.00	\$135.00	\$0.00
6	Timekeeper - Arati Bhattacharya	0.00	\$200.00	\$0.00
7	Timekeeper - Law Clerks	0.00	\$85.00	\$0.00
8	Timekeeper - Isaiah Samaniego	168.50	\$100.00	\$16,850.00
9	TimeKeeper -- Pierre Riou	11.90	\$225.00	\$2,677.50
9	TimeKeeper -- Jeffrey L. Collins	5.00	\$125.00	\$625.00
	GRAND TOTAL	606.10		\$126,690.00

Work Date 05/01/2017:05/31/2017
Client ID 70750

TimeKeeper		Hours	Fees	Rate	NC Hours	NC Fees
MFB MARK F. BENNETT						
70750	Nevada Health CO-OP					
70750002	Legal	7.35	2,756.25	375.00	0.00	0.00
70750003	Claims	2.75	1,031.25	375.00	0.00	0.00
70750004	Financial Matters	7.75	2,906.25	375.00	0.00	0.00
70750008	Company Administration	12.25	4,593.75	375.00	0.00	0.00
70750010	CMS	12.65	4,743.75	375.00	0.00	0.00
70750100	Asset Recovery	31.00	11,625.00	375.00	0.00	0.00
70750102	NHC vs. CMS Litigation	1.30	487.50	375.00	0.00	0.00
70750201	Partner Re	0.70	262.50	375.00	0.00	0.00
	Sub Total (MFB)	75.75	28,406.25	375.00	0.00	0.00*
PHC PATRICK H. CANTILO						
70750	Nevada Health CO-OP					
70750003	Claims	2.00	900.00	450.00	0.00	0.00
70750006	Provider Issues	1.00	450.00	450.00	0.00	0.00
70750008	Company Administration	2.00	900.00	450.00	0.00	0.00
70750010	CMS	17.30	7,785.00	450.00	0.00	0.00
70750100	Asset Recovery	42.30	19,035.00	450.00	0.00	0.00
	Sub Total (PHC)	64.60	29,070.00	450.00	0.00	0.00*
JLC JEFFREY L. COLLINS						
70750	Nevada Health CO-OP					
70750102	NHC vs. CMS Litigation	5.00	625.00	125.00	0.00	0.00
	Sub Total (JLC)	5.00	625.00	125.00	0.00	0.00*
KWJ KRISTEN W. JOHNSON						
70750	Nevada Health CO-OP					
70750001	Takeover Administration	115.10	20,142.50	175.00	0.00	0.00
	Sub Total (KWJ)	115.10	20,142.50	175.00	0.00	0.00*
JOL JOSHUA O. LIVELY						
70750	Nevada Health CO-OP					
70750001	Takeover Administration	24.25	4,243.75	175.00	0.00	0.00
70750002	Legal	33.25	5,818.75	175.00	0.00	0.00
70750003	Claims	27.75	4,856.25	175.00	0.00	0.00
70750008	Company Administration	22.75	3,981.25	175.00	0.00	0.00
70750100	Asset Recovery	38.75	6,781.25	175.00	0.00	0.00
70750103	Potential claims against Milliman	6.50	1,137.50	175.00	0.00	0.00
70750201	Partner Re	12.00	2,100.00	175.00	0.00	0.00
	Sub Total (JOL)	165.25	28,918.75	175.00	0.00	0.00*
PJR PIERRE J. RIOU						
70750	Nevada Health CO-OP					
70750002	Legal	0.30	67.50	225.00	0.00	0.00
70750003	Claims	6.70	1,507.50	225.00	0.00	0.00
70750100	Asset Recovery	4.90	1,102.50	225.00	0.00	0.00
	Sub Total (PJR)	11.90	2,677.50	225.00	0.00	0.00*
IXS ISAIAH SAMANIEGO						
70750	Nevada Health CO-OP					
70750008	Company Administration	168.50	16,850.00	100.00	0.00	0.00
	Sub Total (IXS)	168.50	16,850.00	100.00	0.00	0.00*
Grand Total						
		606.10	126,690.00	209.02	0.00	0.00

Work Date 05/01/2017:05/31/2017
Client ID 70750

Staff ID	Cost Code	Units	Amount	Write Down	Total
	BM1A BUSINESS MEALS	0.00	992.00	0.00	992.00
	FD1A FEDERAL EXPRESS	0.00	237.69	0.00	237.69
	LX1A LEXIS	0.00	1,513.60	0.00	1,513.60
	LX1E LEXIS	0.00	1,589.52	0.00	1,589.52
	PK1A PARKING	0.00	334.25	0.00	334.25
	PO1E POSTAGE	0.00	66.83	0.00	66.83
	SU1A SUPPLIES	0.00	129.51	0.00	129.51
	TA1A TRAVEL-AIRFARE	0.00	1,895.84	0.00	1,895.84
	TE1A TRANSPORTATION EXPENSE	0.00	966.59	0.00	966.59
	TH1A TRAVEL-HOTEL	0.00	1,470.79	0.00	1,470.79
	TL2E TELEPHONE	0.00	1,520.28	0.00	1,520.28
	Sub Total ()	0.00	10,716.90	0.00	10,716.90
	Grand Total	0.00	10,716.90	0.00	10,716.90

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October 2, 2017

BILL SUMMARY

70750 Nevada Health Co-Op ("NHC")

June 1, 2017 - June 30, 2017

<u>Matter No. and Description</u>	<u>Invoice Number</u>	<u>Fees</u>	<u>Costs</u>	<u>Total</u>
June 2017	22181- 22191 22196- 22198	\$ 58,540.00	\$ 6,245.32	\$ 64,785.32
Totals (1)		\$ 58,540.00	\$ 6,245.32	\$ 64,785.32

Cantilo & Bennett, L.L.P.

**NEVADA HEALTH CO-OP
TIMEKEEPER SUMMARY REPORT
6/1/17 - 6/30/17**

		Billable Hours	Billable Rate	June 2017 Billing
1	Timekeeper - Patrick H. Cantilo	19.30	\$450.00	\$8,685.00
2	Timekeeper - Mark F. Bennett	97.25	\$375.00	\$36,468.75
3	Timekeeper - Kristen W. Johnson	0.00	\$175.00	\$0.00
4	Timekeeper - Josh O. Lively	0.00	\$175.00	\$0.00
5	Timekeeper - Nelson J. Dunlap	0.00	\$135.00	\$0.00
6	Timekeeper - Arati Bhattacharya	0.00	\$200.00	\$0.00
7	Timekeeper - Law Clerks	0.00	\$85.00	\$0.00
8	Timekeeper - Isaiah Samaniego	120.50	\$100.00	\$12,050.00
9	TimeKeeper -- Pierre Riou	3.30	\$225.00	\$742.50
9	TimeKeeper -- Jeffrey L. Collins	4.75	\$125.00	\$593.75
	GRAND TOTAL	245.10		\$58,540.00

October 02, 2017
11:27 am

Cantilo & Bennett, L.L.P.
Unbilled Timekeeper Work by Matter

Page 1
[pr 3b]

Client ID 70750
Work Date 06/01/2017:06/30/2017

TimeKeeper		Hours	Fees	NC Hours	NC Fees
MFB MARK F. BENNETT					
70750002	Legal	3.80	1,425.00	0.00	0.00
70750003	Claims	2.05	768.75	0.00	0.00
70750004	Financial Matters	4.60	1,725.00	0.00	0.00
70750007	Member Issues	0.75	281.25	0.00	0.00
70750008	Company Administration	17.45	6,543.75	0.00	0.00
70750010	CMS	4.05	1,518.75	0.00	0.00
70750100	Asset Recovery	64.25	24,093.75	0.00	0.00
70750201	Partner Re	0.30	112.50	0.00	0.00
	Sub Total (MFB)	97.25	36,468.75	0.00	0.00*
PHC PATRICK H. CANTILO					
70750002	Legal	1.50	675.00	0.00	0.00
70750003	Claims	0.30	135.00	0.00	0.00
70750100	Asset Recovery	15.00	6,750.00	0.00	0.00
70750101	Basich vs Xerox, et al	1.00	450.00	0.00	0.00
70750103	Potential claims against Milliman	1.50	675.00	0.00	0.00
	Sub Total (PHC)	19.30	8,685.00	0.00	0.00*
JLC JEFFREY L. COLLINS					
70750102	NHC vs. CMS Litigation	4.75	593.75	0.00	0.00
	Sub Total (JLC)	4.75	593.75	0.00	0.00*
PJR PIERRE J. RIOU					
70750010	CMS	3.30	742.50	0.00	0.00
	Sub Total (PJR)	3.30	742.50	0.00	0.00*
IXS ISAIAH SAMANIEGO					
70750008	Company Administration	120.50	12,050.00	0.00	0.00
	Sub Total (IXS)	120.50	12,050.00	0.00	0.00*
Grand Total		245.10	58,540.00	0.00	0.00

October 02, 2017
1:36 pm

Cantilo & Bennett, L.L.P.
Timekeeper Costs by Work Code

Page 1
[cs1c]

Work Date 06/01/2017:06/30/2017
Client ID 70750

Staff ID	Cost Code	Units	Amount	Write Down	Total
BM1A	BUSINESS MEALS	0.00	944.00	0.00	944.00
FD1A	FEDERAL EXPRESS	0.00	180.51	0.00	180.51
MT1A	MISCELLANEOUS	0.00	311.20	0.00	311.20
PK1A	PARKING	0.00	362.27	0.00	362.27
PO1E	POSTAGE	0.00	30.18	0.00	30.18
SU1A	SUPPLIES	0.00	7.55	0.00	7.55
TA1A	TRAVEL-AIRFARE	0.00	1,479.86	0.00	1,479.86
TE1A	TRANSPORTATION EXPENSE	0.00	771.55	0.00	771.55
TH1A	TRAVEL-HOTEL	0.00	1,415.86	0.00	1,415.86
TL2E	TELEPHONE	0.00	702.48	0.00	702.48
TS1A	TELEPHONE CHARGES	0.00	38.96	0.00	38.96
	Sub Total ()	0.00	6,244.42	0.00	6,244.42
	Grand Total	0.00	6,244.42	0.00	6,244.42

0410

Work Date 06/01/2017:06/30/2017
Client ID 70750

Staff ID	Cost Code	Units	Amount	Write Down	Total
	BM1A BUSINESS MEALS	0.00	944.00	0.00	944.00
	FD1A FEDERAL EXPRESS	0.00	180.51	0.00	180.51
	MT1A MISCELLANEOUS	0.00	312.10	0.00	312.10
	PK1A PARKING	0.00	362.27	0.00	362.27
	PO1E POSTAGE	0.00	30.18	0.00	30.18
	SU1A SUPPLIES	0.00	7.55	0.00	7.55
	TA1A TRAVEL-AIRFARE	0.00	1,479.86	0.00	1,479.86
	TE1A TRANSPORTATION EXPENSE	0.00	771.55	0.00	771.55
	TH1A TRAVEL-HOTEL	0.00	1,415.86	0.00	1,415.86
	TL2E TELEPHONE	0.00	702.48	0.00	702.48
	TS1A TELEPHONE CHARGES	0.00	38.96	0.00	38.96
	Sub Total ()	0.00	6,245.32	0.00	6,245.32
Grand Total		0.00	6,245.32	0.00	6,245.32

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October 24, 2017

BILL SUMMARY

70750 Nevada Health Co-Op ("NHC")

July 1, 2017 - July, 31, 2017

<u>Matter No. and Description</u>	<u>Invoice Number</u>	<u>Fees</u>	<u>Costs</u>	<u>Total</u>
July 2017	22224- 22234	\$ 83,675.00	\$ 4,784.15	\$ 88,459.15
Totals (1)		\$ 83,675.00	\$ 4,784.15	\$ 88,459.15

Cantilo & Bennett, L.L.P.

**NEVADA HEALTH CO-OP
TIMEKEEPER SUMMARY REPORT
7/1/17 - 7/31/17**

		Billable Hours	Billable Rate	July 2017 Billing
1	Timekeeper - Patrick H. Cantilo	21.30	\$450.00	\$9,585.00
2	Timekeeper - Mark F. Bennett	91.10	\$375.00	\$34,162.50
3	Timekeeper - Kristen W. Johnson	0.00	\$175.00	\$0.00
4	Timekeeper - Josh O. Lively	76.00	\$175.00	\$13,300.00
5	Timekeeper - J. Alex Martin	29.50	\$175.00	\$5,162.50
6	Timekeeper - Arati Bhattacharya	45.90	\$200.00	\$9,180.00
7	Timekeeper - Law Clerks	0.00	\$85.00	\$0.00
8	Timekeeper - Isaiah Samaniego	121.50	\$100.00	\$12,150.00
9	TimeKeeper -- Pierre Riou	0.60	\$225.00	\$135.00
9	TimeKeeper -- Jeffrey L. Collins	0.00	\$125.00	\$0.00
	GRAND TOTAL	385.90		\$83,675.00

October 24, 2017
1:12 pm

Cantilo & Bennett, L.L.P.
Unbilled Timekeeper Work by Matter

Page 1
[pr 3b]

Client ID 70750
Work Date 7/1/2017:07/31/2017

TimeKeeper		Hours	Fees	NC Hours	NC Fees
MFB MARK F. BENNETT					
70750002	Legal	5.20	1,950.00	0.00	0.00
70750003	Claims	2.05	768.75	0.00	0.00
70750004	Financial Matters	9.00	3,375.00	0.00	0.00
70750006	Provider Issues	0.50	187.50	0.00	0.00
70750008	Company Administration	4.10	1,537.50	0.00	0.00
70750010	CMS	2.75	1,031.25	0.00	0.00
70750100	Asset Recovery	66.50	24,937.50	0.00	0.00
70750102	NHC vs. CMS Litigation	1.00	375.00	0.00	0.00
Sub Total (MFB)		91.10	34,162.50	0.00	0.00*
ABS ARATI BHATTACHARYA					
70750001	Takeover Administration	45.90	9,180.00	0.00	0.00
Sub Total (ABS)		45.90	9,180.00	0.00	0.00*
PHC PATRICK H. CANTILO					
70750003	Claims	1.80	810.00	0.00	0.00
70750100	Asset Recovery	17.50	7,875.00	0.00	0.00
70750102	NHC vs. CMS Litigation	2.00	900.00	0.00	0.00
Sub Total (PHC)		21.30	9,585.00	0.00	0.00*
JOL JOSHUA O. LIVELY					
70750001	Takeover Administration	13.00	2,275.00	0.00	0.00
70750002	Legal	13.00	2,275.00	0.00	0.00
70750008	Company Administration	5.00	875.00	0.00	0.00
70750100	Asset Recovery	45.00	7,875.00	0.00	0.00
Sub Total (JOL)		76.00	13,300.00	0.00	0.00*
JAM JAMES A. MARTIN					
Sub Total (JAM)		29.50	5,162.50	0.00	0.00
		29.50	5,162.50	0.00	0.00*
PJR PIERRE J. RIOU					
70750002	Legal	0.60	135.00	0.00	0.00
Sub Total (PJR)		0.60	135.00	0.00	0.00*
IXS ISAIAH SAMANIEGO					
70750008	Company Administration	121.50	12,150.00	0.00	0.00
Sub Total (IXS)		121.50	12,150.00	0.00	0.00*
Grand Total		385.90	83,675.00	0.00	0.00

November 03, 2017
2:41 pm

Cantilo & Bennett, L.L.P.
Timekeeper Costs by Work Code

Page 1
[cs1c]

Work Date 07/01/2017:07/31/2017
Client ID 70750

Staff ID	Cost Code	Units	Amount	Write Down	Total
BM1A	BUSINESS MEALS	0.00	576.00	0.00	576.00
FD1A	FEDERAL EXPRESS	0.00	86.60	0.00	86.60
MT1A	MISCELLANEOUS	0.00	377.00	0.00	377.00
PK1A	PARKING	0.00	174.25	0.00	174.25
SU1A	SUPPLIES	0.00	49.76	0.00	49.76
TA1A	TRAVEL-AIRFARE	0.00	895.94	0.00	895.94
TE1A	TRANSPORTATION EXPENSE	0.00	698.42	0.00	698.42
TH1A	TRAVEL-HOTEL	0.00	922.08	0.00	922.08
TL2E	TELEPHONE	0.00	1,004.10	0.00	1,004.10
	Sub Total ()	0.00	4,784.15	0.00	4,784.15
	Grand Total	0.00	4,784.15	0.00	4,784.15

0415

CANTILO & BENNETT, L.L.P.

ATTORNEYS & COUNSELORS
*A Texas Registered Limited Liability Partnership
Comprised of Professional Corporations*

11401 Century Oaks Terrace
Suite 300

Telephone: (512) 478-6000

Austin, Texas 78758
www.cb-firm.com

Facsimile: (512) 404-6550

November 10, 2017

BILL SUMMARY

70750 Nevada Health Co-Op ("NHC")

August 1, 2017 - August 31, 2017

<u>Matter No. and Description</u>	<u>Invoice Number</u>	<u>Fees</u>	<u>Costs</u>	<u>Total</u>
August 2017	22253- 22265	\$157,687.50	\$11,420.96	\$169,108.46
Totals (1)		\$157,687.50	\$11,420.96	\$169,108.46

Cantilo & Bennett, L.L.P.

**NEVADA HEALTH CO-OP
TIMEKEEPER SUMMARY REPORT
8/1/17 - 8/31/17**

		Billable Hours	Billable Rate	August 2017 Billing
1	Timekeeper - Patrick H. Cantilo	40.30	\$450.00	\$18,135.00
2	Timekeeper - Mark F. Bennett	108.05	\$375.00	\$40,518.75
3	Timekeeper - Kristen W. Johnson	54.70	\$175.00	\$9,572.50
4	Timekeeper - Josh O. Lively	168.50	\$175.00	\$29,487.50
5	Timekeeper - J. Alex Martin	85.50	\$175.00	\$14,962.50
6	Timekeeper - Arati Bhattacharya	141.50	\$200.00	\$28,300.00
7	Timekeeper - Law Clerks	19.00	\$85.00	\$1,615.00
8	Timekeeper - Isaiah Samaniego	125.00	\$100.00	\$12,500.00
9	TimeKeeper - Pierre Riou	8.90	\$225.00	\$2,002.50
10	TimeKeeper - Jeffrey L. Collins	4.75	\$125.00	\$593.75
	GRAND TOTAL	756.20		\$157,687.50

Client ID 70750
Work Date 8/1/17:08/31/2017

TimeKeeper		Hours	Fees	NC Hours	NC Fees
MFB MARK F. BENNETT					
70750002	Legal	2.65	993.75	0.00	0.00
70750003	Claims	3.80	1,425.00	0.00	0.00
70750004	Financial Matters	4.20	1,575.00	0.00	0.00
70750007	Member Issues	0.75	281.25	0.00	0.00
70750008	Company Administration	13.55	5,081.25	0.00	0.00
70750009	Lease Issues	0.20	75.00	0.00	0.00
70750010	CMS	16.85	6,318.75	0.00	0.00
70750100	Asset Recovery	65.75	24,656.25	0.00	0.00
70750201	Partner Re	0.30	112.50	0.00	0.00
	Sub Total (MFB)	108.05	40,518.75	0.00	0.00*
ABS ARATI BHATTACHARYA					
70750001	Takeover Administration	141.50	28,300.00	0.00	0.00
	Sub Total (ABS)	141.50	28,300.00	0.00	0.00*
PHC PATRICK H. CANTILO					
70750008	Company Administration	1.00	450.00	0.00	0.00
70750010	CMS	2.00	900.00	0.00	0.00
70750100	Asset Recovery	32.00	14,400.00	0.00	0.00
70750102	NHC vs. CMS Litigation	5.30	2,385.00	0.00	0.00
	Sub Total (PHC)	40.30	18,135.00	0.00	0.00*
JLC JEFFREY L. COLLINS					
	Sub Total (JLC)	4.75	593.75	0.00	0.00
		4.75	593.75	0.00	0.00*
KWJ KRISTEN W. JOHNSON					
70750001	Takeover Administration	54.70	9,572.50	0.00	0.00
	Sub Total (KWJ)	54.70	9,572.50	0.00	0.00*
KTO KYLE T. OSBORN					
70750100	Asset Recovery	19.00	1,615.00	0.00	0.00
	Sub Total (KTO)	19.00	1,615.00	0.00	0.00*
JOL JOSHUA O. LIVELY					
70750001	Takeover Administration	17.75	3,106.25	0.00	0.00
70750002	Legal	43.25	7,568.75	0.00	0.00
70750008	Company Administration	32.25	5,643.75	0.00	0.00
70750100	Asset Recovery	75.25	13,168.75	0.00	0.00
	Sub Total (JOL)	168.50	29,487.50	0.00	0.00*
JAM JAMES A. MARTIN					
	Sub Total (JAM)	85.50	14,962.50	0.00	0.00
		85.50	14,962.50	0.00	0.00*
PJR PIERRE J. RIOU					
70750002	Legal	5.40	1,215.00	0.00	0.00
70750010	CMS	2.00	450.00	0.00	0.00
70750100	Asset Recovery	1.50	337.50	0.00	0.00
	Sub Total (PJR)	8.90	2,002.50	0.00	0.00*
IXS ISAIAH SAMANIEGO					
70750008	Company Administration	125.00	12,500.00	0.00	0.00
	Sub Total (IXS)	125.00	12,500.00	0.00	0.00*
Grand Total		756.20	157,687.50	0.00	0.00

November 10, 2017
10:35 am

Cantilo & Bennett, L.L.P.
Timekeeper Costs by Work Code

Page 1
[cs1c]

Work Date 08/01/2017:08/31/2017
Client ID 70750

Staff ID	Cost Code	Units	Amount	Write Down	Total
BM1A	BUSINESS MEALS	0.00	1,152.00	0.00	1,152.00
LX1E	LEXIS	0.00	2,237.48	0.00	2,237.48
MT1A	MISCELLANEOUS	0.00	1,107.88	0.00	1,107.88
PK1A	PARKING	0.00	233.50	0.00	233.50
PO1E	POSTAGE	0.00	85.99	0.00	85.99
SU1A	SUPPLIES	0.00	41.06	0.00	41.06
TA1A	TRAVEL-AIRFARE	0.00	1,598.84	0.00	1,598.84
TE1A	TRANSPORTATION EXPENSE	0.00	1,227.80	0.00	1,227.80
TH1A	TRAVEL-HOTEL	0.00	1,844.16	0.00	1,844.16
	Sub Total ()	0.00	9,528.71	0.00	9,528.71
	Grand Total	0.00	9,528.71	0.00	9,528.71

11401 Century Oaks Terrace
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Austin, Texas 78758



PALOMAR FINANCIAL, LC

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Facsimile (512) 404-6530
Toll Free (877) 309-7105
www.palomarfin.com

October 2, 2017

BILL SUMMARY

707500 Nevada Health Co-Op ("NHC")

June 1, 2017 – June 30, 2017

<u>Matter No. and Description</u>	<u>Fees</u>	<u>Costs</u>	<u>Total</u>
June 2017	\$16,635.00	\$0.00	\$16,635.00
Totals (1)	\$16,635.00	\$0.00	\$16,635.00

Palomar Financial, LC

**NEVADA HEALTH CO-OP
PRIVILEGED AND CONFIDENTIAL
SUMMARY REPORT
PERIOD JUNE 2017**

		Billable Hours	Billable Rate	June 2017 Billing
1	TIME KEEPER - Nicole Wilkins	8.30	\$250.00	\$2,075.00
2	TIME KEEPER - Robert Stebel	1.75	\$160.00	\$280.00
3	TIME KEEPER - Burnett Wallace	24.50	\$150.00	\$3,675.00
4	TIME KEEPER - Neda Khalaf	33.00	\$160.00	\$5,280.00
5	TIME KEEPER - Susan Roehm	19.50	\$150.00	\$2,925.00
6	TIME KEEPER - Gayathri Sivadasan	16.00	\$150.00	\$2,400.00
	GRAND TOTAL	103.05		\$16,635.00

Palomar Financial, LC
06/01/2017-06/30/2017
Client: Nevada Health Co-Op ("NHC")

Staff ID	Name	Description	Hours	Amount
NMW	Nicole Wilkins	Payroll & Employee Benefits	2.25	\$ 562.50
		Investment Accounting/Support	0.25	\$ 62.50
		Accounts Payable and Receivable	5.55	\$ 1,387.50
		Bank Account Administration/Reconciliation	0.25	\$ 62.50
		Sub Total (NMW)	8.30	\$ 2,075.00
RNS	Robert Stebel	Investment Accounting/Support	0.75	\$ 120.00
		Regulatory Responses/Compliance	1.00	\$ 160.00
		Sub Total (RNS)	1.75	\$ 280.00
BAW	Burnett Wallace	Payroll & Employee Benefits	24.50	\$ 3,675.00
		Sub Total (BAW)	24.50	\$ 3,675.00
NK	Neda Khalaf	Accounts Payable and Receivable	33.00	\$ 5,280.00
		Sub Total (NK)	33.00	\$ 5,280.00
SER	Susan Roehm	IT Support & Administration	19.50	\$ 2,925.00
		Sub Total (SER)	19.50	\$ 2,925.00
GS	Gayathri Sivadasan	Accounts Payable and Receivable	16.00	\$ 2,400.00
		Sub Total (GS)	16.00	\$ 2,400.00
	Grand Total		103.05	\$ 16,635.00

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Austin, Texas 78758



PALOMAR FINANCIAL, LC

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October 24, 2017

BILL SUMMARY

707500 Nevada Health Co-Op ("NHC")

July 1, 2017 – July 31, 2017

Matter No. and Description	Fees	Costs	Total
July 2017	\$11,712.50	\$0.00	\$11,712.50
Totals (1)	\$11,712.50	\$0.00	\$11,712.50

Palomar Financial, LC

**NEVADA HEALTH CO-OP
PRIVILEGED AND CONFIDENTIAL
SUMMARY REPORT
PERIOD JULY 2017**

		Billable Hours	Billable Rate	July 2017 Billing
1	TIME KEEPER - Nicole Wilkins	13.60	\$250.00	\$3,400.00
2	TIME KEEPER - Robert Stebel	0.75	\$160.00	\$120.00
3	TIME KEEPER - Burnett Wallace	14.85	\$150.00	\$2,227.50
4	TIME KEEPER - Neda Khalaf	26.50	\$160.00	\$4,240.00
5	TIME KEEPER - Susan Roehm	4.50	\$150.00	\$675.00
6	TIME KEEPER - Gayathri Sivadasan	7.00	\$150.00	\$1,050.00
	GRAND TOTAL	67.20		\$11,712.50

Palomar Financial, LC
07/01/2017-07/31/2017
Client: Nevada Health Co-Op ("NHC")

Staff ID	Name	Description	Hours	Amount
NMW	Nicole Wilkins	Accounting Reports/Receivership Team Support	1.60	\$ 400.00
		Payroll & Employee Benefits	7.00	\$ 1,750.00
		Accounts Payable and Receivable	4.55	\$ 1,137.50
		Bank Account Administration/Reconciliation	0.45	\$ 112.50
		Sub Total (NMW)	13.60	\$ 3,400.00
RNS	Robert Stebel	Regulatory Responses/Compliance	0.75	\$ 120.00
		Sub Total (RNS)	0.75	\$ 120.00
BAW	Burnett Wallace	Payroll & Employee Benefits	14.85	\$ 2,227.50
		Sub Total (BAW)	14.85	\$ 2,227.50
NK	Neda Khalaf	Accounts Payable and Receivable	26.50	\$ 4,240.00
		Sub Total (NK)	26.50	\$ 4,240.00
SER	Susan Roehm	Accounting Reports/Receivership Team Support	1.50	\$ 225.00
		Guaranty Associations Reports/Administration	3.00	\$ 450.00
		Sub Total (SER)	4.50	\$ 675.00
GS	Gayathri Sivadasan	Accounts Payable and Receivable	7.00	\$ 1,050.00
		Sub Total (GS)	7.00	\$ 1,050.00
	Grand Total		67.20	\$ 11,712.50

11401 Century Oaks Terrace
Suite 310
Austin, Texas 78758



PALOMAR FINANCIAL, LC

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Facsimile (512) 404-6530
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November 10, 2017

BILL SUMMARY

707500 Nevada Health Co-Op ("NHC")

August 1, 2017 – August 31, 2017

<u>Matter No. and Description</u>	<u>Fees</u>	<u>Costs</u>	<u>Total</u>
August 2017	\$18,582.50	\$0.00	\$18,582.50
Totals (1)	\$18,582.50	\$0.00	\$18,582.50

Palomar Financial, LC

NEVADA HEALTH CO-OP
PRIVILEGED AND CONFIDENTIAL
SUMMARY REPORT
PERIOD AUGUST 2017

		Billable Hours	Billable Rate	August 2017 Billing
1	TIME KEEPER - Nicole Wilkins	22.25	\$250.00	\$5,562.50
2	TIME KEEPER - Robert Stebel	1.00	\$160.00	\$160.00
3	TIME KEEPER - Burnett Wallace	11.65	\$150.00	\$1,747.50
4	TIME KEEPER - Neda Khalaf	42.50	\$160.00	\$6,800.00
5	TIME KEEPER - Susan Roehm	14.75	\$150.00	\$2,212.50
6	TIME KEEPER - Gayathri Sivadasan	14.00	\$150.00	\$2,100.00
	GRAND TOTAL	106.15		\$18,582.50

Palomar Financial, LC
08/01/2017-08/31/2017
Client: Nevada Health Co-Op ("NHC")

Staff ID	Name	Description	Hours	Amount
NMW	Nicole Wilkins	Financial Statement Preparation/Planning	1.05	\$ 262.50
		Accounting Reports/Receivership Team Support	2.80	\$ 700.00
		Payroll & Employee Benefits	6.20	\$ 1,550.00
		Accounts Payable and Receivable	10.00	\$ 2,500.00
		Bank Account Administration/Reconciliation	1.35	\$ 337.50
		Taxes and Tax Planning	0.60	\$ 150.00
		Regulatory Responses & Compliance	0.25	\$ 62.50
		IT Support & Administration		\$ -
		Sub Total (NMW)	22.25	\$ 5,562.50
RNS	Robert Stebel	Regulatory Responses/Compliance	1.00	\$ 160.00
		Sub Total (RNS)	1.00	\$ 160.00
BAW	Burnett Wallace	Payroll & Employee Benefits	11.65	\$ 1,747.50
		Sub Total (BAW)	11.65	\$ 1,747.50
NK	Neda Khalaf	Accounts Payable and Receivable	42.50	\$ 6,800.00
		Sub Total (NK)	42.50	\$ 6,800.00
SER	Susan Roehm	Accounts Payable and Receivable	1.50	\$ 225.00
		Reports/Replies to Policyholders, Creditors, Other Parties	6.00	\$ 900.00
SER	Susan Roehm	IT Support & Administration	7.25	\$ 1,087.50
		Sub Total (SER)	14.75	\$ 2,212.50
GS	Gayathri Sivadasan	Accounts Payable and Receivable	14.00	\$ 2,100.00
		Sub Total (GS)	14.00	\$ 2,100.00
	Grand Total		106.15	\$ 18,582.50

Invoice No.: 4586770
File No. : 170678.010100
Bill Date : September 17, 2017

Nevada Health Co-Op
Cantilo & Bennett, L.L.P.
c/o Mark F. Bennett, Esq.
11401 Century Oaks Terrace, Suite 300
Austin, TX 78758

INVOICE

Re: NHC in Receivership

Legal Services through August 31, 2017:

Total Fees: \$ 156,179.00

Expenses:

Conference Calls	3.54
Filing Fees	66.50
Publication Charges	124.65

Total Expenses: \$ 194.69

Current Invoice: \$ 156,373.69

MEF:TKK
Tax ID: 13-3613083



Invoice No.: 4585468
File No. : 170678.010200
Bill Date : September 15, 2017

Nevada Health Co-Op
Cantilo & Bennett, L.L.P.
c/o Mark F. Bennett, Esq.
11401 Century Oaks Terrace, Suite 300
Austin, TX 78758

Attn: Barbara Richardson
Cantilo & Bennett

INVOICE

Re: Nevada Health Co-Op/adv. Yiming Wu

Legal Services through August 31, 2017:

Total Fees: \$ 1,390.50

Expenses:

Parking Charges

15.00

Total Expenses: \$ 15.00

Current Invoice: \$ 1,405.50

EWS:TKK
Tax ID: 13-3613083

Invoice No.: 4613859
File No. : 170678.010100
Bill Date : October 16, 2017

Nevada Health Co-Op
Cantilo & Bennett, L.L.P.
c/o Mark F. Bennett, Esq.
11401 Century Oaks Terrace, Suite 300
Austin, TX 78758

INVOICE

Re: NHC in Receivership

Legal Services through September 30, 2017:

Total Fees: \$ 49,025.00

Expenses:

Filing Fees	63.00
Messenger/Courier Services	85.00
UPS Charges	37.26

Total Expenses: \$ 185.26

Current Invoice: \$ 49,210.26

MEF:TKK
Tax ID: 13-3613083

Invoice No.: 4613854
File No. : 170678.010200
Bill Date : October 16, 2017

Nevada Health Co-Op
Cantilo & Bennett, L.L.P.
c/o Mark F. Bennett, Esq.
11401 Century Oaks Terrace, Suite 300
Austin, TX 78758

Attn: Barbara Richardson
Cantilo & Bennett

INVOICE

Re: Nevada Health Co-Op/adv. Yiming Wu

Legal Services through September 30, 2017:

Total Fees: \$ 800.00

Expenses:

Parking Charges

6.00

Total Expenses: \$ 6.00

Current Invoice: \$ 806.00

EWS:TKK
Tax ID: 13-3613083



Invoice Remittance

Barbara D. Richardson
Nevada Health CO-OP
c/o Mark Bennett
Cantilo & Bennett, LLP
11401 Century Oaks Terrace, Suite 300
Austin, TX 78758
mfbennett@cb-firm.com

September 12, 2017
FTI Invoice No. 7455831
FTI Job No. 425623.0005
Terms NET 30
Federal I.D. No. 52-1261113
Currency: USD

Re: Nevada Health CO-OP in Receivership

Current Invoice Period: Charges Posted through August 31, 2017

Amount Due This Period

Professional Services.....	\$9,442.50
Expenses.....	<u>\$0.00</u>
Amount Due this Period.....	\$9,442.50



Invoice Remittance

Mark Bennett
Cantilo & Bennett, LLP
11401 Century Oaks Terrace, Suite 300
Austin, TX 78758
mfbennett@cb-firm.com

October 23, 2017
FTI Invoice No. 7459946
FTI Job No. 425623.0005
Terms NET 30
Federal I.D. No. 52-1261113
Currency: USD

Re: Nevada Health CO-OP in Receivership

Current Invoice Period: Charges Posted through September 30, 2017

Amount Due This Period

Professional Services	\$360.00
Expenses	<u>\$0.00</u>
Total Amount Due	<u>\$360.00</u>



DEVITO CONSULTING, INC
JOSEPH J. DEVITO CONSULTING

August 7, 2017

Mr. Mark E. Bennett
Cantilo & Bennett, LLP
11401 Century Oaks Terrace
Suite 300
Austin, TX 78758

Re: Work Related to Nevada Health CO-OP ("NHC")

Dear Mr. Bennett:


The following is a summary of consulting fees incurred from July 1, 2017 through July 31, 2017 in connection with the above-referenced matter.

Total Due - Consulting Fees

\$23,275.00

Details of time are provided in the enclosed schedules. Your prompt payment is appreciated.

Very truly yours,



Joseph J. DeVito
President

Enclosures



DEVITO CONSULTING, INC.
JOSEPH J. DEVITO CONSULTING

September 6, 2017

Mr. Mark F. Bennett
Cantilo & Bennett, LLP
11401 Century Oaks Terrace
Suite 300
Austin, TX 78758

Re: Work Related to Nevada Health CO-OP ("NHC")

Dear Mr. Bennett:

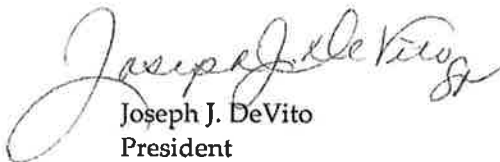
The following is a summary of consulting fees incurred from August 1, 2017 through August 31, 2017 in connection with the above-referenced matter.

Total Due - Consulting Fees

\$1,225.00

Details of time are provided in the enclosed schedules. Your prompt payment is appreciated.

Very truly yours,



Joseph J. DeVito
President

Enclosures



DEVITO CONSULTING, INC.
JOSEPH J. DEVITO CONSULTING

November 8, 2017

Mr. Mark F. Bennett
Cantilo & Bennett, LLP
11401 Century Oaks Terrace
Suite 300
Austin, TX 78758

Re: Work Related to Nevada Health CO-OP ("NHC")

Dear Mr. Bennett:

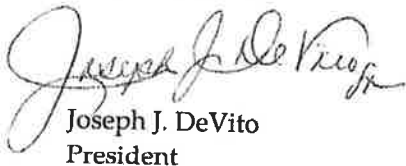
The following is a summary of consulting fees incurred from October 1, 2017 through October 31, 2017 in connection with the above-referenced matter.

Total Due - Consulting Fees

\$3,062.50

Details of time are provided in the enclosed schedules. Your prompt payment is appreciated.

Very truly yours,



Joseph J. DeVito
President

Enclosures

EXHIBIT “2”

NEVADA HEALTH CO-OP

Cash Flow Analysis

Oct 2015 - Nov 2017

Sources & Uses

Beginning Cash on October 1, 2015

\$ 5,352,417

SOURCES:

Premium Revenue	17,755,920
CSR Recoveries	2,347,121
Rx Rebates	-
Claims Overpayment Recoveries	676,815
PartnerRe 2014 Premium Refund	374,513
Traditional Reins Recoveries	787,352
FTR Reins Recoveries	735,747
Risk Corridor 2014	1,163,872
Federal Receivables Bridge Loan	-
Restricted Cash became Unrestricted	768,517
Other	507,942
TOTAL SOURCES:	\$25,117,798

USES:

Medical Claims Q4 2015 and Post 2015 Adj	(160,992)
Rx Claims Q4 2015	(7,599,195)
Risk Adjustment 2015	-
Medical PMPMs Q4	(43,967)
FTR Reinsurance Premium	(898,687)
Traditional Reins Premium Q4 2015	(547,319)
Premium Tax	(294,665)
Other Admin	(9,710,023)
9010 ACA Fee / 720 PCORI Fee	(161,242)
Professional Services	(4,356,146)

TOTAL USES:

(\$23,772,237)

Net cash increase for period

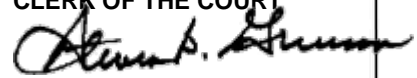
\$1,345,561

Ending Cash at end of Nov 30, 2017

\$ 6,697,978

TAB 16

TAB 16



1 **SR**

2 MARK E. FERRARIO, ESQ.
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8 *Counsel for Barbara D. Richardson,*
9 *Commissioner of Insurance,*
10 *as the Permanent Receiver for*
Nevada Health CO-OP

11 **IN THE EIGHTH JUDICIAL DISTRICT COURT**
12 **CLARK COUNTY, NEVADA**

14 STATE OF NEVADA, EX REL.)	Case No. A-15-725244-C
15 COMMISSIONER OF INSURANCE, IN HER)	
16 OFFICIAL CAPACITY AS STATUTORY)	Dept. No. 1
17 RECEIVER FOR DELINQUENT DOMESTIC)	
18 INSURER,)	
19)	
20)	
21)	
22)	
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TENTH STATUS REPORT

COME NOW, Commissioner of Insurance Barbara D. Richardson in her capacity as Receiver of Nevada Health CO-OP ("NHC," or the "CO-OP"), and CANTILO & BENNETT, L.L.P., Special Deputy Receiver ("SDR" - SDR and the Commissioner as Receiver are referred to collectively herein as "Receiver") and file this Tenth Status Report in the above-captioned receivership.

1 **I. INTRODUCTION AND HISTORICAL BACKGROUND**

2 The CO-OP is a state-licensed health insurer, formed in 2012 as a Health Maintenance
3 Organization ("HMO"), with a Certificate of Authority granted by the State of Nevada Division
4 of Insurance effective January 2, 2013. NHC is an Internal Revenue Code 501(c)(29) Qualified
5 Non-Profit Health Insurance Issuer, entitled to tax exemption by the Internal Revenue Service
6 ("IRS"). NHC was formed under a provision of the Patient Protection and Affordable Care Act
7 ("ACA") providing for the formation of Consumer Operated and Oriented Plans. Having
8 received from the Centers for Medicare and Medicaid Services ("CMS") of the United States
9 Department of Health and Human Services ("HHS") a start-up loan of \$17,080,047, and a
10 "solvency" loan of \$48,820,349, NHC was required to operate as a non-profit, consumer-driven
11 health insurance issuer for the benefit of the public. The CO-OP's primary business was to
12 provide ACA-compliant health coverage to residents of Nevada, and it operated its business
13 for the benefit of Nevadans within the state, save for certain arrangements to provide
14 nationwide health coverage to Nevadans traveling outside the state in certain circumstances.
15 NHC began selling products on and off the Silver State Health Insurance Exchange (the
16 "Exchange") on January 1, 2014. Its products include individual, small group, and large group
17 managed care coverages.

18 On October 1, 2015, this Court issued its Order Appointing the Acting Insurance
19 Commissioner, Amy L. Parks as Temporary Receiver of NHC Pending Further Orders of the
20 Court and Granting Temporary Injunctive Relief Pursuant to NRS 696B.270 (the "Temporary
21 Receivership Order"). Further, on October 14, 2015, the Receivership Court entered its
22 Permanent Injunction and Order Appointing Commissioner as Permanent Receiver of Nevada
23 Health CO-OP (the "Permanent Receivership Order"), appointing the law firm of CANTILO &
24 BENNETT, L.L.P. as SDR of NHC, in accordance with Chapter 696B of the Nevada Revised
25 Statutes.

26 Via a Notice of Substitution of Receiver dated April 6, 2016, Ms. Joanna N. Grigoriev
27 informed interested parties of the substitution of Commissioner Barbara D. Richardson, in place
28 and stead of former Acting Commissioner Amy L. Parks, as the Receiver of NHC. This

substitution of Receiver was subsequent to Commissioner Richardson's appointment as Commissioner of Insurance for the State of Nevada.

This Court, through its Final Order Finding and Declaring Nevada Health CO-OP to be Insolvent and Placing Nevada Health CO-OP into Liquidation (the "Final Order") dated September 20, 2016, adjudged NHC to be insolvent on grounds that it is unable to meet obligations as they mature. The Final Order also authorized the Receiver to liquidate the business of NHC and wind up its ceased operations pursuant to applicable Nevada law. The Receiver has since transitioned the receivership estate from rehabilitation to liquidation.

The Receiver continues to file quarterly status reports as ordered by this Court.

II. RECEIVERSHIP ADMINISTRATION

Receivership Administrative Services and Oversight

CANTILO & BENNETT, L.L.P., as SDR of NHC, manages the receivership estate and conducts its affairs. PALOMAR FINANCIAL, LC ("Palomar"), an affiliate of the SDR, performs administration, information technology, and other related services for the Receiver under the supervision of the SDR. The Receiver has included an informational copy, as Exhibit 1 to this Tenth Status Report, of the invoices paid to the SDR, Palomar, and other receivership consultants since the last status report to this Court.¹

¹ The portions of billing entries that are being filed/submitted for *in camera* inspection are specifically identified by Bates number herein. The *in camera* materials are being submitted in a separate envelope.

Certain billings submitted to the Court are appropriate for *in camera* review (as opposed to being made part of a public filing). More particularly, and as discussed in further detail below, certain consultants in this matter are providing expert witness related services. As such, the billing entries relating thereto should be considered confidential and/or otherwise not subject to discovery.

In this regard, courts have held that the bills of legal counsel and experts may be withheld from legal discovery and are not subject to legal disclosure, as this information may provide indications or context concerning potential litigation strategy and the nature of the expert services being provided. *See, e.g., Avnet, Inc. v. Avana Technologies Inc.*, No. 2:13-cv-00929- GMN-PAL, 2014 WL 6882345, at *1 (D. Nev. Dec. 4, 2014) (finding that billing entries were privileged because they reveal a party's strategy and the nature of services provided); *Fed. Sav. & Loan Ins. Corp. v. Ferm*, 909 F.2d 372, 374-75 (9th Cir. 1990) (considering whether or not fee information revealed counsel's mental impressions concerning litigation strategy). Other courts that have addressed this issue have recognized that the "attorney-client privilege embraces attorney time, records and statements to the extent that they reveal

Resolution of Outstanding Receivership Matters

Pre-Liquidation Claims Adjudications and Claims Solidification

NHC's staff continues the process of claims adjudications. At this point, new claims are only accepted for review if the claimant can show proof of timely filing (*i.e.*, proof that the claim was previously submitted in advance of the Receiver's Claims Filing Deadline).

The Receiver continues to coordinate with those plan members who were reported to collection agencies by healthcare providers and facilities, or who are currently being sought for payment based on the receivership estate's obligations. In cases where collection efforts have taken place in violation of the Permanent Receivership Order, NHC staff members contact those providers and any related collection agencies to inform them of the Permanent Receivership Order and its moratorium on the payment of health claims. When necessary, the SDR has also sent letters to such providers to advise them that their direct collection actions violate the Permanent Receivership Order and may justify receivership remedies against them.

Continuation of Mandatory Regulatory Reporting to CMS

As explained in prior status reports, the Receiver and SDR have submitted essential data for the various regulatory reporting processes required for CO-OPs under the ACA, and NHC fulfills ongoing requirements as may be applicable. The Receiver is working to resolve CMS matters so that the maximum amounts are collected under the various federal receivables programs.

NHC is owed payments relating to several such programs, including: Cost Sharing Reduction ("CSR") Reconciliation, Federal Transitional Reinsurance, Risk Adjustment, and

litigation strategy and the nature of the services provided." *Real v. Cont'l Grp., Inc.*, 116 F.R.D. 211, 213 (N.D. Cal. 1986).

The *in-camera* review should apply not only to documentation concerning attorneys' fees, but it also extends to "details of work revealed in [an] expert's work description [which] would relate to tasks for which she [or he] was compensated[.]" a situation which is "analogous to protecting attorney-client privileged information contained in counsel's bills describing work performed." *See DaVita Healthcare Partners, Inc. v. United States*, 128 Fed. Cl. 584, 592-93 (2016); *see also Chaudhry v. Gallerizzo*, 174 F.3d 394, 402 (4th Cir. 1999) (recognizing that "correspondence, bills, ledgers, statements, and time records which also reveal the motive of the client in seeking representation, litigation strategy, or the specific nature of the services provided, such as researching particular areas of law," are protected from disclosure) (quoting *Clarke v. Am. Commerce Nat'l Bank*, 974 F.2d 127, 129 (9th Cir. 1992)).

1 Risk Corridors. The expected receipt of these federal receivables is a key part of any future
2 claim payments by NHC. The non-receipt of substantially all federal accounts payable for plan
3 year 2015, and a material portion of accounts payable for plan year 2014, has greatly
4 diminished NHC's assets and, therefore, its claims-paying ability.

5 CMS has maintained the position that any monies deemed owed to NHC (*i.e.*, the
6 receivership estate) are to be set off against the amounts CMS asserts it is owed under the
7 start-up loan to NHC. CMS has so far made offsets against accounts payable to NHC for the
8 outstanding balance of the start-up loan. The SDR sent a letter to CMS to request a detailed,
9 cumulative accounting of all offsets applied to date so that the SDR could review CMS'
10 accounting of charges and offsets applied to NHC's accounts payable. The SDR received such
11 an accounting and reviewed it in detail. The SDR sent a follow-up letter to CMS, via counsel
12 at the Department of Justice, to request clarification of several items in the prior accounting, as
13 well as to request an updated accounting (to include any subsequent offsets). The SDR awaits
14 a response from CMS.

15 ***Updates as to Current Status of Regulatory Submissions Projects***

16 NHC Risk Adjustment and Federal Transitional Reinsurance data was submitted to CMS
17 on May 2, 2016. On June 30, 2016, CMS released its Summary Report on Transactional
18 Reinsurance and Permanent Risk Adjustment Transfers for the 2015 Benefit Year.² Per the
19 report, for coverage year 2015, the CO-OP is owed a Federal Transitional Reinsurance
20 payment of \$8,842,009.69 and net Risk Adjustment transfer of \$4,532,560.29. The 2015
21 Federal Transitional Reinsurance payment amount increased by \$4,601.65 to \$8,846,611.34
22 in the December 6, 2016, Amendment to the Summary Report on Transitional Reinsurance
23 Payments and Permanent Risk Adjustment Transfers for the 2015 Benefit Year.³

24 In 2016, the reporting related to the CSR Reconciliation program resulted in a net
25 amount owed by NHC to CMS of \$3,579,359.65 for 2014 and 2015 CSRs. At the beginning of
26 June 2017, the SDR submitted amended filings to CMS of the 2014 and 2015 CSRs, resulting

27 ² Available at: <https://www.cms.gov/CCIIO/Programs-and-Initiatives/Premium-Stabilization-Programs/Downloads/June-30-2016-RA-and-RI-Summary-Report-5CR-063016.pdf>.

28 ³ Available at: https://www.cms.gov/CCIIO/Programs-and-Initiatives/Premium-Stabilization-Programs/Downloads/DDC_RevisedJune30thReport_v2_5CR_120516.pdf.

1 in NHC owing an adjusted balance to CMS of \$482,948.54 rather than \$3,579,359.65—or a
2 reduction in NHC liability of \$3,096,411.11. CMS has accepted this adjustment.

3 Regarding the 2015 Risk Corridors, CMS has confirmed that NHC is owed \$29.9 million
4 for its individual market and \$3.75 million for its small group market.⁴ However, CMS claims to
5 have no funds available to pay 2015 Risk Corridors at this time, and it has announced that all
6 2015 and 2016 benefit year collections will be used towards remaining 2014 benefit year risk
7 corridors balances.⁵ Due to a shortfall in risk corridor collections, CMS was initially able to pay
8 only a prorated 12.6% of all 2014 Risk Corridors payments due to issuers. In November 2016,
9 CMS announced an additional expected payment toward NHC's 2014 Risk Corridor of
10 \$355,443.99. Likewise, in November 2017, CMS announced an additional expected payment
11 toward NHC's 2014 Risk Corridor of \$93,079.06. The CO-OP is still owed over \$9.4 million for
12 unpaid 2014 Risk Corridors.

13 **Use of Third-Party Contractors as Part of Business Operations**

14 The Receiver utilizes the services of several third-party contractors that had been
15 engaged before commencement of the receivership, and some of them (*i.e.*, Eldorado,
16 Redcard, and Indegene) were engaged after the receivership commenced to assist in
17 management of NHC's affairs. The Receiver has also engaged the services of some new third-
18 party contractors (*i.e.*, Jacobson and ADP) to perform services to assist the administration of
19 the Company.

20 The following is a list of independent contractors currently assisting the receivership:

- 21 1. Eldorado, a division of Mphasis Corporation, to provide a hosting service for
22 claims data and information.
- 23 2. The Jacobson Group, to provide claims and customer service staffing support.

24
25
26 ⁴ DEP'T OF HEALTH & HUMAN SERVICES & CENTERS FOR MEDICARE & MEDICAID SERVICES
27 ("CMS"), CCIIO MEMORANDUM, RISK CORRIDORS PAYMENT AND CHARGE AMOUNTS FOR THE 2015
28 BENEFIT YEAR (November 18, 2016) (available at <https://www.cms.gov/CCIIO/Resources/Regulations-and-Guidance/Downloads/2015-RC-Issuer-level-Report-11-18-16-FINAL-v2.pdf>).

⁵ *Id.*; CMS, CCIIO MEMORANDUM, RISK CORRIDORS PAYMENT AND CHARGE AMOUNTS FOR
THE 2016 BENEFIT YEAR (November 15, 2017) (available at <https://www.cms.gov/CCIIO/Programs-and-Initiatives/Premium-Stabilization-Programs/Downloads/Risk-Corridors-Amounts-2016.pdf>).

1 3. Redcard, to perform check processing and delivery to health care providers, and
2 delivery of Explanation of Benefit disclosures to providers and plan members.

3 4. ADP, to provide payroll support and processing for employee compensation and
4 benefits.

5 5. Indegene Healthcare, LLC to provide analytical and data services for 2014 and
6 2015 risk adjustment calculations.

7 **Consulting Expert Retained**

8 The Receiver has retained D'Antonio Technologies ("D'Antonio") to provide information
9 technology consulting expert services for the tracking and sorting of data, assembling of data
10 for electronic discovery, and other consulting services involving the Company's technology
11 systems. Thus far, the Receiver has paid \$10,200 for D'Antonio's consulting services. It is
12 anticipated that D'Antonio's services will be necessary during the duration of the pending
13 litigation involving NHC. Depending on the length and complexity of NHC's litigation with other
14 parties, D'Antonio's total costs may range from another \$50,000 to \$175,000. This cost
15 projection is a very rough estimate that may change depending on factors that are beyond the
16 Receiver's control, including issues with the quality of data, issues with analyzing data, and
17 issues with retrieving data for discovery requests. The Receiver will continue to evaluate
18 D'Antonio's services and may further revise these projections based on new developments and
19 circumstances.

20 On October 16, 2017, the Receiver filed with the Receivership Court the Receiver's
21 Motion to Approve Professional Fee Rates, seeking an order approving certain professional
22 fee rates for D'Antonio Technologies, and permitting the Receiver to approve and pay invoices
23 of D'Antonio Technologies as she deems necessary, without subsequent application to the
24 Court. The Court later approved the Receiver's engagement of this technology services
25 professional, requesting via a minute order that the Receiver provide an estimate of
26 expenditures anticipated for services rendered, which has now been provided in this report.

Internal Administrative Matters Related to Wind Down

NHC maintains staff to address calls from interested parties regarding the proof of claim ("POC") process, other claim matters, and the collection of assets for the receivership. The Receiver has refunded premium overpayments to members since such overpayments were not funds to which NHC was entitled and are therefore outside the normal claim process.

The wind down of NHC's 401(k) retirement plan continues, with the SDR having received from the IRS the necessary determination letter advising that the wind-down process does not implicate federal tax obligations. In light of this response, the SDR has instructed the Principal Financial Group, the investment company currently in custody of the retirement plan assets, to commence the de-conversion and transfer of plan assets to former retirement plan participants as though those participants were fully vested in their account balances. Following a final compliance check with applicable federal and state guidelines relating to tax-advantaged retirement accounts, which included the execution of plan termination authorizations sent to the investment company in early March 2018, former plan participants will now receive the mandatory disclosures concerning their funds. The disclosures to plan participants will be sent to their last known address, alongside instructions for transferring their plan account balances.

The Receiver also maintains an office for NHC's essential office staff.⁶

Commencement of Action Against Various Professionals and Other Firms Who Performed Services for and on Behalf of NHC

On August 25, 2017, Counsel for the Receiver filed in Clark County District Court a complaint (Case No. A-17-760558-C in Department No. 18) against various persons, third-party vendors, and professional service firms which are alleged to have contributed to NHC's current hazardous financial condition by, among other things, failing to adhere to applicable standards of professional care and requirements imposed by law, misrepresentation concerning quality and standard of care for services performed, and breaches of contract, duty, and implied covenants of good faith and fair dealing.

⁶ Currently, NHC maintains fifteen full-time employees and one part-time employee.

1 The complaint names, among others, NHC's former actuaries, accountants, auditors,
2 and providers of certain business operations and utilization review services, as well as those
3 individuals who specifically performed, or who were in the role of supervising the performance
4 of, those services. The Complaint also names several of NHC's former directors and executive
5 management.

6 On September 14, 2017, Counsel for the Receiver filed with this Court a Motion to
7 Coordinate Cases, seeking a coordination of that case and the overarching receivership action
8 being supervised by this Court on grounds that the case constitutes an asset recovery action,
9 an integral part of the resolution of the receivership that merits continued supervision by this
10 Court. This motion was set for in chambers hearing on October 19, 2017, but was continued
11 to November 7, 2017. An opposition to the Motion to Coordinate Cases was filed by Milliman,
12 and subsequently joined by Nevada Health Solutions, InsureMonkey, Larson, and many of the
13 former directors and officers of NHC. By an order dated December 8, 2017, this Court denied
14 Plaintiff's Motion to Coordinate Cases.

15 A request to reassign this case to the Business Court on the grounds that the action
16 involves the alleged commission of torts related to business was filed September 28, 2017, and
17 Judge Nancy Alf was assigned. Judge Kathleen Delaney has been assigned the case
18 subsequent to Judge Alf being subject to a peremptory challenge dated November 9, 2017.

19 Milliman filed its Motion to Compel Arbitration on November 6, 2017, a motion which
20 was challenged by the December 11, 2017, filing of Plaintiff's Opposition to Milliman's Motion
21 to Compel Arbitration. The hearing to address this issue was scheduled for December 12,
22 2017, but had been reset for a hearing on January 9, 2018. Milliman would again state its
23 bases to compel arbitration of those matters raised in the instant litigation via a reply dated
24 January 3, 2018. This motion and related briefing were heard by Judge Kathleen Delaney on
25 January 9, 2018. The related Order Granting Milliman's Motion to Compel Arbitration, dated
26 March 12, 2018, held that a requirement to arbitrate in the pre-receivership agreements
27 between NHC and Milliman did apply to the Receiver's claims against Milliman, as the
28 Receiver's claims against Milliman would not have arisen but for the agreement, and such

1 agreement contains an enforceable arbitration provision. The Order also acknowledged the
2 “strong presumption” in favor of arbitration under federal and Nevada law, and characterized
3 the Receiver’s claims against Milliman as pre-receivership, common law damages claims
4 which did not necessarily need to be brought to the Court overseeing the receivership directly.
5 The Receiver has filed a Motion for Reconsideration of the Milliman arbitration ruling.

6 Millennium filed a Motion to Dismiss on October 26, 2017, and an opposition to such
7 motion was filed by the Receiver on December 18, 2017. The hearing on that Motion to Dismiss
8 was scheduled for December 12, 2017, but this was later rescheduled to January 9, 2018, on
9 stipulation of the parties, and then later rescheduled to be heard on January 16, 2018, by
10 another stipulation. Millennium restated its bases for dismissing several claims in the litigation
11 against it in its Reply in Support of its Motion to Dismiss dated January 9, 2018. The related
12 hearing on these matters was conducted by Judge Elizabeth Gonzalez on January 16, 2018,
13 who denied the Motion in all respects.

14 The six NHC former directors and officers named specifically in the Original Petition
15 joined together in filing their January 16, 2018, Motion to Dismiss, Alternatively for More Definite
16 Statement, seeking to have the Court dismiss all claims against them for intentional
17 misrepresentation and fraud, negligent misrepresentation, constructive fraud, unjust
18 enrichment, and civil conspiracy, on the basis that the Receiver had not sufficiently articulated
19 her claims under such causes of action in the Original Petition. Counsel for InsureMonkey and
20 Alex Rivlin filed a Limited Joinder to the aforementioned Motion to Dismiss on January 23,
21 2018, stating essentially similar grounds to justify a dismissal of the claims based on
22 “impermissibly vague allegations” relating to them. The hearing on this Motion and its related
23 matters was initially scheduled to occur on February 20, 2018, but was later rescheduled to
24 March 20, 2018, via a stipulation reached between the parties. A second stipulation and
25 proposed order was approved on March 8, 2018, rescheduling the hearing on the motion and
26 joinder to April 24, 2018.

27 The Parties had their mandatory pre-trial conference under Nevada Rule of Civil
28 Procedure 16 on January 23, 2018, in order to establish the applicable deadlines for finalizing

1 discovery, participating in a mandatory settlement conference, and setting forth the provisional
2 schedule for trial. Until otherwise modified, parties have until October 22, 2018, to file motions
3 to amend pleadings or add parties and to designate experts, until November 21, 2018, to
4 designate rebuttal experts, until January 25, 2019, to complete discovery, and until February
5 22, 2019, to file Motions in Limine or other Dispositive Motions. The mandatory settlement
6 conference is scheduled to occur on June 8, 2018, and the jury trial is to begin in earnest on
7 May 20, 2019. Pre-trial memoranda are to be filed no later than May 6, 2019, with a calendar
8 call on May 14, 2019. Motions for approval of an ESI Protocol and a Protective Order were
9 filed on orders shortening time. They are currently scheduled for a hearing on April 3, 2018.

10 **Commencement of Action Against CMS to Settle Questions of Setoff as to Mutual**
11 **Obligations**

12 On March 16, 2017, Counsel for the Receiver filed in the United States District Court for
13 the District of Nevada a Complaint and Demand for Jury Trial (the "Complaint") against the
14 United States Department of Health and Human Services, the Centers for Medicare and
15 Medicaid Services, Thomas E. Price, M.D. in his capacity as the U.S. Secretary of Health and
16 Human Services, and the United States (the "Defendants"). Through this Complaint, the
17 Receiver seeks both judicial review of a final agency action made by Defendants and a
18 declaratory judgment as to Defendants' right to set off any monies claimed against NHC
19 through funds that HHS/CMS is statutorily obligated to pay to NHC. As has been reported to
20 this Court on several occasions, Defendants (via CMS) have provided notice to the Receiver
21 of their termination of the underlying Loan Agreement through which the CO-OP received its
22 funds under the ACA, declaring those loans immediately due and payable. Further, on March
23 6, 2016, HHS/CMS stated that an "administrative hold" on payables due to NHC had been
24 implemented at the request of the U.S. Department of Justice. As part of this chain of events,
25 on September 29, 2016, HHS/CMS claimed that approximately \$7 million had been offset
26 against funds payable to NHC from the outstanding amount of the start-up loan, and
27 prospectively asserted its "right" to offset future payables. As noted above, CMS has since
28

1 notified the SDR on several occasions of additional offsets, and the SDR has sought
2 clarification regarding CMS' accounting.

3 The Complaint therefore seeks relief in the form of a declaratory judgment which holds
4 that the federal government's setoffs and prospective setoffs are unlawful under Nevada state
5 reserve requirements, solvency regulations, requisite surplus note requirements, and other
6 similar laws. As well, the Receiver seeks a declaration that both the start-up and solvency
7 loans given to NHC are subordinated to the claims of NHC's policyholders and subscriber
8 members, that the debts the Defendants seek to set off lack the requirement of mutuality
9 necessary to permit such a setoff, and that any such setoffs were and are improper.

10 Defendants' Motion to Dismiss was filed in that case on June 29, 2017, asserting that
11 the Receiver's claim for declaratory relief fails both for lack of jurisdiction and on the merits.

12 A Stipulation and Order to Extend Briefing Schedule regarding that Motion to Dismiss
13 was filed with the United States District Court for the State of Nevada, with the consent of
14 counsel for both plaintiff and defendants, on August 8, 2017. This stipulation provided that the
15 Receiver shall have up to and including August 28, 2017, to respond to the HHS/CMS motion
16 to dismiss, and HHS/CMS shall have up to and including October 4, 2017, to submit a reply
17 brief. This Stipulation was approved via an order entered August 10, 2017.

18 The Receiver filed her Opposition to Motion to Dismiss on August 28, 2017. The
19 Opposition to Motion to Dismiss, *inter alia*, asserts that not only does the Administrative
20 Procedure Act provide a waiver of sovereign immunity which applies to this action, but that the
21 CMS Loan Agreement contains an express waiver of sovereign immunity under its own terms,
22 insofar as that agreement specifically declares that both parties (HHS/CMS and NHC) consent
23 to the jurisdiction of the federal courts located within Nevada, and courts of appeal therefrom.
24 On October 4, 2017, HHS/CMS filed its Reply in Support of Motion to Dismiss the Complaint,
25 wherein the Court of Federal Claims was again argued to be sole jurisdiction under which the
26 suit may be adjudicated, that any monetary relief provided by that court would adequately
27 address the agency actions NHC complains of, and that sovereign immunity had not been
28 waived under the terms of the CMS Loan Agreement.

1 On December 5, 2017, Plaintiff filed its Initial Case Management Statement and
2 Scheduling Order, proposing a plan and schedule for discovery to be conducted in that case.
3 The next day, Defendants filed their Motion to Deny Plaintiff's Proposed Scheduling Order.
4 The hearing on this contested matter was initially scheduled for December 21, 2017, but was
5 later rescheduled upon stipulation of the parties to January 23, 2018. This hearing was later
6 vacated and continued by minute order of the Court to January 30, 2018, until it was further
7 continued to April 3, 2018, via a second stipulation of the parties dated January 19, 2018, and
8 approved via order dated January 23, 2018. A third stipulation of the parties filed March 14
9 continued the hearing on the Motion to Deny Plaintiff's Proposed Scheduling Order until May
10 15, 2018.

11 On March 30, 2018, the District Court entered an Order granting the Defendants' Motion
12 to Dismiss the Complaint, based on a finding that the Receiver's Complaint ultimately seeks
13 monetary relief that is available exclusively through the Court of Federal Claims. Therefore,
14 the court held, jurisdiction over the claims against CMS and the federal government lies
15 exclusively in the Court of Federal Claims under the Tucker Act. Recourse to the Court of
16 Federal Claims, the Court explained in its Order, was appropriate because Plaintiff could obtain
17 a full remedy for her stated claims, as that court could both award monetary damages as well
18 as prevent setting off further payments under the principle of *res judicata*.

19 **Notice of Claim Determination to CMS**

20 In response to a POC filed by CMS against the NHC receivership estate before
21 expiration of the April 28, 2017, claims filing deadline, a notice of claim determination ("NCD")
22 was issued by the SDR to CMS on June 14, 2017, making the following claim determinations:

- 23 a. CMS claims have priority no higher than NRS § 696B.420(1)(d) ("Class D").
- 24 b. Federal law, including 31 U.S.C. § 3713, does not give CMS a claim priority
25 higher than Class D with respect to NHC's assets or in the NHC liquidation
26 proceeding.
- 27 c. Under federal and state law, including NRS 696B.440, CMS claims may not be
28 properly set off "against debts owed to NHC by the United States."

- d. Any setoff of amounts claimed by the U.S., if set off against amounts owed to NHC, would impermissibly elevate the U.S. claims above their statutory priority level.
- e. Any setoff of amounts claimed by the U.S., if set off against amounts owed to NHC, would violate the NHC permanent receivership order.
- f. The CMS claims are not entitled to secured creditor claim priority to the extent they are subject to a set off by a claim of NHC against the United States.
- g. It appears that the receivership estate has insufficient assets to pay NHC claims with priority lower than Class B. Thus, the Receiver makes no determination right now as to the following: (1) the merit of the CMS claim, (2) the amount claimed, or (3) whether the CMS claim would have a Class D or lower priority.
- h. No claim received after the NHC claims deadline, if not rendered absolute, can participate in a share of NHC's assets. Thus, any later or additional claim by CMS will be deemed a late-filed claim for which NHC is not liable. The purported claim reservation of the United States to assert later determined claims is therefore ineffective.

CMS was notified in the June 14, 2017, NCD that its appeal, if any, was due to be filed within sixty (60) days of the notice (*i.e.*, by August 13, 2017). To date, CMS has not provided any responsive appeal. Therefore, pursuant to the Receivership Appeal Procedure ("RAP"), the SDR's June 14, 2017, determination is final and non-appealable.

IRS Penalties Assessed for Data Inaccuracies in Information Filings

The SDR received a notice from the IRS dated October 2, 2017, regarding an unpaid amount of \$491.98 and relating to the Form 720 (quarterly federal excise tax return). The notice threatened to seize NHC's property to satisfy the amount due. The SDR has contacted the IRS regarding this notice and been informed that the notice relates to interest due on NHC's Patient-Centered Outcomes Research Institute ("PCORI") fees. The IRS has filed a POC for this amount, and is aware that NHC is in liquidation. An IRS bankruptcy specialist informed

1 the SDR that a receivership “freeze” will be placed on this item, no seizure of assets is in
2 progress, and no additional notices should be received on this matter.

3 The SDR has received other notices from the IRS seeking to compel the payment of
4 penalties assessed against NHC regarding the submission of erroneous Form 1099 and Tax
5 Information Number data for tax years 2014 and 2015. The Receiver has written separately
6 regarding both tax years, to explain that reasonable cause to withhold the penalty exists and
7 that Treasury regulations insulate assets administered by a Receivership Court from seizure
8 and levy by the IRS. Regarding the 2014 and 2015 penalties, the IRS requested additional
9 documents to support the SDR’s request. The SDR responded with the requested
10 documentation, and the IRS subsequently notified the SDR that there is now \$0.00 owed to the
11 IRS for the 2014 and 2015 penalties.

12 **Resolution of POCs, Provision of NCDs, Appeals**

13 The Receiver has implemented the POC process approved by this Court in its Final
14 Order, and has already conducted general mailings and publication of necessary notices to
15 claimants and other interested parties.

16 The Claims Filing Deadline was April 28, 2017, and the SDR received 141 POCs. Many
17 of these are incomplete or unable to be adjudicated for various other reasons, and the SDR
18 has notified various claimants of claim deficiencies. The SDR will continue adjudicating POCs
19 and developing NCDs in expectation of mailing such determinations after obtaining the
20 necessary approval from this Court.

21 **Claims for Which There Are Currently Insufficient Assets to Pay**

22 It does not appear now that there will be sufficient assets to pay claims beyond those
23 assigned a Class B priority pursuant to NRS 696B.420(1)(b). The SDR has received several
24 POCs that should be assigned to priority classes C through L, pursuant to NRS 696B.420(1)(c)-
25 (l). In such instances, the SDR proposes to send claimants NCDs that determine the priority
26 of their claims is no higher than NRS § 696B.420(1)(c) (“Class C”), which determination will be
27 subject to appeal under the Receivership Appeal Procedure (“RAP”). To conserve the assets
28 of the estate, and per NRS 696B.330(4), the SDR of NHC will refrain from reaching the merits

1 of these claims until such time it appears that assets will be available for distribution to that
2 class. If additional assets later become available for distribution to these claimants, the SDR
3 will make a second claim determination as to the merits of each claim and notify the claimants
4 of such determination.

5 **Claims Asserted Against the Estate by Providers**

6 Health care providers are not required to use the POC form to submit their claims,
7 because NHC already has a pre-existing process for receiving and processing such claims,
8 having thousands of such processed claims already in its claim processing system. Providers
9 were required to use (and most did use) the pre-existing claims process to submit their claims
10 before the Claims Filing Deadline.

11 The SDR will be preparing NCDs to send providers for their claims. After reporting claim
12 determinations to the Court, the SDR will begin mailing providers' NCDs. The provider NCD
13 will show the amount the SDR has approved to be paid for each claim, along with the member's
14 responsibility portion of the claim—which the provider may collect from the member without
15 violating the Permanent Receivership Order. For this reason, the member will also receive a
16 copy of the NCD. Members and providers may appeal NCDs in accordance with the RAP.

17 **Current Receivership Assets**

18 The Receiver's evaluation of the assets and liabilities of the CO-OP is ongoing, and
19 adjusted periodically to accommodate new authorized payments, receipts, and transfers.
20 Below is an overview of some key asset matters thus far identified by the Receiver (other than
21 those already mentioned herein):

22 1. Before year-end 2016, the Receiver submitted a reinsurance claim to Partner Re
23 based on 2015 claims information. In April and May 2017, Partner Re paid the Receiver a total
24 of \$787,352.41 in satisfaction of NHC's reinsurance claims, but ultimately adjusted this amount
25 by \$2,196.11 in Partner Re's favor.

26 2. The unrestricted cash assets of the CO-OP have fluctuated with post-
27 receivership expenses and claim payments, as well as with the Receiver's receipt of member
28 premiums. The currently-available, unrestricted cash assets of the CO-OP as of February 28,

2018, were approximately \$5,581,106. The majority of NHC's currently available and liquid assets have been invested in a bond mutual fund, with the remainder of such assets held in bank deposits.

3. The financial information of NHC in this Tenth Status Report provides estimates. NHC's financials may materially vary depending upon the estate's receipt of the promised federal receivables payments under the various ACA programs described in this report and future litigation recoverables. These figures will remain estimates until the estate receives clearer indications from CMS and the federal government as to the amount and timing of any federal payments, as well as the outcome of the recent lawsuit filed by the Receiver against CMS regarding the administrative hold and asserted rights to setoff. As mentioned, the Receiver continues work to resolve matters with CMS.

4. The Receiver is enclosing, as Exhibit 2 attached hereto, a cash flow report for NHC for the period covering the inception of the receivership through February 28, 2018. This report reflects a summary of disbursements and collections made by NHC during this period.

CONCLUSION

The Receiver has submitted this report in compliance with the Receivership Court's instructions for a status report on NHC. The Receiver requests that the Court approve this Tenth Status Report and the actions taken by the Receiver.

DATED this 3rd day of April 2018.

Respectfully submitted:

Barbara D. Richardson, Commissioner of Insurance of the State of Nevada, in her Official Capacity as Statutory Receiver of Delinquent Domestic Insurer

By: /s/ CANTILO & BENNETT, L.L.P.
Special Deputy Receiver
By Its Authorized Representative
Patrick H. Cantilo

Respectfully submitted by:

/s/ERIC W. SWANIS

MARK E. FERRARIO, ESQ.

Nevada Bar No. 1625

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Nevada Bar No. 6840

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*Counsel for Barbara D. Richardson,
Commissioner of Insurance,
as the Permanent Receiver for
Nevada Health CO-OP*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on the 3rd day of April 2018, and pursuant to NEFCR 9, NRCP 5(b), and EDCR 7.26, I served this **TENTH STATUS REPORT** on all parties receiving service in this action through electronic transmission via this Court's electronic filing system to:

E-Service Master List For Case

State of Nevada, ex rel. Commissioner of Insurance, Plaintiff(s) vs. Nevada Health CO-OP, Defendant(s)

Attorney General's Office

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/s/Sandy Jackson

An employee of Greenberg Traurig, LLP

EXHIBIT “1”

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February 2, 2018

BILL SUMMARY

70750 Nevada Health Co-Op ("NHC")

September 1, 2017 - September 30, 2017

<u>Matter No. and Description</u>	<u>Invoice Number</u>	<u>Fees</u>	<u>Costs</u>	<u>Total</u>
September 2017	22360- 22373	\$146,089.00	\$ 20,807.70	\$166,896.70
Totals (1)		\$146,089.00	\$ 20,807.70	\$166,896.70

Cantilo & Bennett, L.L.P.

**NEVADA HEALTH CO-OP
TIMEKEEPER SUMMARY REPORT
9/1/17 - 9/30/17**

		Billable Hours	Billable Rate	August 2017 Billing
1	Timekeeper - Patrick H. Cantilo	16.00	\$450.00	\$7,200.00
2	Timekeeper - Mark F. Bennett	83.70	\$375.00	\$31,387.50
3	Timekeeper - Kristen W. Johnson	150.10	\$175.00	\$26,267.50
4	Timekeeper - Josh O. Lively	147.00	\$175.00	\$25,725.00
5	Timekeeper - J. Alex Martin	86.50	\$175.00	\$15,137.50
6	Timekeeper - Arati Bhattacharya	100.40	\$200.00	\$20,080.00
7	Timekeeper - Law Clerks	40.40	\$85.00	\$3,434.00
8	Timekeeper - Isaiah Samaniego	122.30	\$100.00	\$12,230.00
9	TimeKeeper - Pierre Riou	9.90	\$225.00	\$2,227.50
10	TimeKeeper - Jeffrey L. Collins	2.00	\$125.00	\$250.00
	GRAND TOTAL	758.30		\$143,939.00

February 06, 2018
8:54 am

Cantilo & Bennett, L.L.P.
Timekeeper Costs by Work Code

Page 1
[cs1c]

Work Date 09/01/2017:09/30/2017
Client ID 70750

Staff ID	Cost Code	Units	Amount	Write Down	Total
	BM1A BUSINESS MEALS	0.00	1,520.00	0.00	1,520.00
	LX1E LEXIS	0.00	11,297.28	0.00	11,297.28
	MT1A MISCELLANEOUS	0.00	132.50	0.00	132.50
	PK1A PARKING	0.00	346.75	0.00	346.75
	PO1E POSTAGE	0.00	17.69	0.00	17.69
	TA1A TRAVEL-AIRFARE	0.00	1,883.76	0.00	1,883.76
	TE1A TRANSPORTATION EXPENSE	0.00	1,491.77	0.00	1,491.77
	TH1A TRAVEL-HOTEL	0.00	2,354.33	0.00	2,354.33
	TL2E TELEPHONE	0.00	1,753.07	0.00	1,753.07
	TS1A TELEPHONE CHARGES	0.00	10.55	0.00	10.55
	Sub Total ()	0.00	20,807.70	0.00	20,807.70
	Grand Total	0.00	20,807.70	0.00	20,807.70

February 06, 2018
8:43 am

Cantilo & Bennett, L.L.P.
Timekeeper Submitted Work by Matter

Page 1
[pr 3]

Work Date 09/01/2017:09/30/2017
Client ID 70750

TimeKeeper		Hours	Fees	Rate	NC Hours	NC Fees
MFB	MARK F. BENNETT					
70750	Nevada Health CO-OP					
70750002	Legal	3.20	1,200.00	375.00	0.00	0.00
70750003	Claims	1.05	393.75	375.00	0.00	0.00
70750004	Financial Matters	5.00	1,875.00	375.00	0.00	0.00
70750006	Provider Issues	0.45	168.75	375.00	0.00	0.00
70750007	Member Issues	5.55	2,081.25	375.00	0.00	0.00
70750008	Company Administration	14.90	5,587.50	375.00	0.00	0.00
70750010	CMS	4.55	1,706.25	375.00	0.00	0.00
70750015	Tax Issues	2.50	937.50	375.00	0.00	0.00
70750100	Asset Recovery	46.50	17,437.50	375.00	0.00	0.00
	Sub Total (MFB)	83.70	31,387.50	375.00	0.00	0.00*
ABS	ARATI BHATTACHARYA					
70750	Nevada Health CO-OP					
70750001	Takeover Administration	100.40	20,080.00	200.00	0.00	0.00
	Sub Total (ABS)	100.40	20,080.00	200.00	0.00	0.00*
PHC	PATRICK H. CANTILO					
70750	Nevada Health CO-OP					
70750004	Financial Matters	1.00	450.00	450.00	0.00	0.00
70750008	Company Administration	1.50	675.00	450.00	0.00	0.00
70750100	Asset Recovery	13.50	6,075.00	450.00	0.00	0.00
	Sub Total (PHC)	16.00	7,200.00	450.00	0.00	0.00*
JLC	JEFFREY L. COLLINS					
70750	Nevada Health CO-OP					
70750102	NHC vs. CMS Litigation	2.00	250.00	125.00	0.00	0.00
	Sub Total (JLC)	2.00	250.00	125.00	0.00	0.00*
KWJ	KRISTEN W. JOHNSON					
70750	Nevada Health CO-OP					
70750001	Takeover Administration	150.10	26,267.50	175.00	0.00	0.00
	Sub Total (KWJ)	150.10	26,267.50	175.00	0.00	0.00*
KTO	KYLE T. OSBORN					
70750	Nevada Health CO-OP					
70750001	Takeover Administration	26.70	2,269.50	85.00	0.00	0.00
70750100	Asset Recovery	13.70	1,164.50	85.00	0.00	0.00
	Sub Total (KTO)	40.40	3,434.00	85.00	0.00	0.00*
JOL	JOSHUA O. LIVELY					
70750	Nevada Health CO-OP					
70750001	Takeover Administration	28.00	4,900.00	175.00	0.00	0.00
70750002	Legal	14.00	2,450.00	175.00	0.00	0.00
70750008	Company Administration	35.50	6,212.50	175.00	0.00	0.00
70750100	Asset Recovery	69.50	12,162.50	175.00	0.00	0.00
	Sub Total (JOL)	147.00	25,725.00	175.00	0.00	0.00*
JAM	JAMES A. MARTIN					
70750	Nevada Health CO-OP					
70750100	Asset Recovery	86.50	15,137.50	175.00	0.00	0.00
	Sub Total (JAM)	86.50	15,137.50	175.00	0.00	0.00*
PJR	PIERRE J. RIOU					
70750	Nevada Health CO-OP					
70750002	Legal	9.90	2,227.50	225.00	0.00	0.00
	Sub Total (PJR)	9.90	2,227.50	225.00	0.00	0.00*
IXS	ISAIAH SAMANIEGO					
70750	Nevada Health CO-OP					
70750008	Company Administration	122.30	12,230.00	100.00	0.00	0.00
	Sub Total (IXS)	122.30	12,230.00	100.00	0.00	0.00*
Grand Total		758.30	143,939.00	189.82	0.00	0.00

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February 22, 2018

BILL SUMMARY

70750 Nevada Health Co-Op ("NHC")

October 1, 2017 - October 31, 2017

<u>Matter No. and Description</u>	<u>Invoice Number</u>	<u>Fees</u>	<u>Costs</u>	<u>Total</u>
October 2017	22405- 22416	\$186,081.25	\$ 9,139.19	\$195,220.44
Totals (1)		\$186,081.25	\$ 9,139.19	\$195,220.44

Cantilo & Bennett, L.L.P.

**NEVADA HEALTH CO-OP
TIMEKEEPER SUMMARY REPORT
10/1/17 - 10/31/17**

		Billable Hours	Billable Rate	August 2017 Billing
1	Timekeeper - Patrick H. Cantilo	40.10	\$450.00	\$18,045.00
2	Timekeeper - Mark F. Bennett	107.85	\$375.00	\$40,443.75
3	Timekeeper - Kristen W. Johnson	170.70	\$175.00	\$29,872.50
4	Timekeeper - Josh O. Lively	176.00	\$175.00	\$30,800.00
5	Timekeeper - J. Alex Martin	104.25	\$175.00	\$18,243.75
6	Timekeeper - Jose M. Rangel	13.25	\$300.00	\$3,975.00
7	Timekeeper - Arati Bhattacharya	133.00	\$200.00	\$26,600.00
8	Timekeeper - Law Clerks	23.50	\$85.00	\$1,997.50
9	Timekeeper - Isaiah Samaniego	143.75	\$100.00	\$14,375.00
10	TimeKeeper - Pierre Riou	3.10	\$225.00	\$697.50
11	TimeKeeper - Jeffrey L. Collins	8.25	\$125.00	\$1,031.25
	GRAND TOTAL	923.75		\$186,081.25

February 22, 2018
10:50 am

Cantilo & Bennett, L.L.P.
Timekeeper Submitted Work by Matter

Page 1
[pr 3]

Work Date 10/01/2017:10/31/2017
Client ID 70750

TimeKeeper		Hours	Fees	Rate	NC Hours	NC Fees
MFB MARK F. BENNETT						
70750 Nevada Health CO-OP						
70750002 Legal		5.55	2,081.25	375.00	0.00	0.00
70750003 Claims		2.40	900.00	375.00	0.00	0.00
70750004 Financial Matters		7.25	2,718.75	375.00	0.00	0.00
70750007 Member Issues		1.95	731.25	375.00	0.00	0.00
70750008 Company Administration		6.65	2,493.75	375.00	0.00	0.00
70750100 Asset Recovery		78.00	29,250.00	375.00	0.00	0.00
70750102 NHC vs. CMS Litigation		6.05	2,268.75	375.00	0.00	0.00
Sub Total (MFB)		107.85	40,443.75	375.00	0.00	0.00*
ABS ARATI BHATTACHARYA						
70750 Nevada Health CO-OP						
70750001 Takeover Administration		133.00	26,600.00	200.00	0.00	0.00
Sub Total (ABS)		133.00	26,600.00	200.00	0.00	0.00*
PHC PATRICK H. CANTILO						
70750 Nevada Health CO-OP						
70750003 Claims		0.50	225.00	450.00	0.00	0.00
70750004 Financial Matters		0.80	360.00	450.00	0.00	0.00
70750008 Company Administration		1.50	675.00	450.00	0.00	0.00
70750015 Tax Issues		0.30	135.00	450.00	0.00	0.00
70750100 Asset Recovery		32.00	14,400.00	450.00	0.00	0.00
70750102 NHC vs. CMS Litigation		5.00	2,250.00	450.00	0.00	0.00
Sub Total (PHC)		40.10	18,045.00	450.00	0.00	0.00*
JLC JEFFREY L. COLLINS						
70750 Nevada Health CO-OP						
70750102 NHC vs. CMS Litigation		8.25	1,031.25	125.00	0.00	0.00
Sub Total (JLC)		8.25	1,031.25	125.00	0.00	0.00*
KWJ KRISTEN W. JOHNSON						
70750 Nevada Health CO-OP						
70750001 Takeover Administration		170.70	29,872.50	175.00	0.00	0.00
Sub Total (KWJ)		170.70	29,872.50	175.00	0.00	0.00*
KTO KYLE T. OSBORN						
70750 Nevada Health CO-OP						
70750001 Takeover Administration		15.00	1,275.00	85.00	0.00	0.00
70750002 Legal		0.50	42.50	85.00	0.00	0.00
70750100 Asset Recovery		8.00	680.00	85.00	0.00	0.00
Sub Total (KTO)		23.50	1,997.50	85.00	0.00	0.00*
JOL JOSHUA O. LIVELY						
70750 Nevada Health CO-OP						
70750001 Takeover Administration		4.50	787.50	175.00	0.00	0.00
70750002 Legal		14.00	2,450.00	175.00	0.00	0.00
70750003 Claims		4.00	700.00	175.00	0.00	0.00
70750004 Financial Matters		3.50	612.50	175.00	0.00	0.00
70750008 Company Administration		16.50	2,887.50	175.00	0.00	0.00
70750100 Asset Recovery		133.50	23,362.50	175.00	0.00	0.00
Sub Total (JOL)		176.00	30,800.00	175.00	0.00	0.00*
JAM JAMES A. MARTIN						
70750 Nevada Health CO-OP						
70750100 Asset Recovery		104.25	18,243.75	175.00	0.00	0.00
Sub Total (JAM)		104.25	18,243.75	175.00	0.00	0.00*
JMR JOSE M. RANGEL						
70750 Nevada Health CO-OP						
70750100 Asset Recovery		13.25	3,975.00	300.00	0.00	0.00
Sub Total (JMR)		13.25	3,975.00	300.00	0.00	0.00*
PJR PIERRE J. RIOU						
70750 Nevada Health CO-OP						
70750002 Legal		1.50	337.50	225.00	0.00	0.00
70750100 Asset Recovery		1.60	360.00	225.00	0.00	0.00

February 22, 2018
10:50 am

Cantilo & Bennett, L.L.P.
Timekeeper Submitted Work by Matter

Page 2
[pr 3]

Work Date 10/01/2017:10/31/2017
Client ID 70750

TimeKeeper	Hours	Fees	Rate	NC Hours	NC Fees
Sub Total (PJR)	3.10	697.50	225.00	0.00	0.00*
IXS ISAAH SAMANIEGO					
70750 Nevada Health CO-OP					
70750008 Company Administration	143.75	14,375.00	100.00	0.00	0.00
Sub Total (IXS)	143.75	14,375.00	100.00	0.00	0.00*
Grand Total	923.75	186,081.25	201.44	0.00	0.00

Staff ID	Cost Code	Units	Amount	Write Down	Total
	BM1A BUSINESS MEALS	0.00	1,152.00	0.00	1,152.00
	FD1A FEDERAL EXPRESS	0.00	27.98	0.00	27.98
	LX1E LEXIS	0.00	153.55	0.00	153.55
	MT1A MISCELLANEOUS	0.00	50.00	0.00	50.00
	PK1A PARKING	0.00	124.45	0.00	124.45
	PO1E POSTAGE	0.00	22.96	0.00	22.96
	SU1A SUPPLIES	0.00	10.66	0.00	10.66
	TA1A TRAVEL-AIRFARE	0.00	2,180.84	0.00	2,180.84
	TE1A TRANSPORTATION EXPENSE	0.00	1,339.69	0.00	1,339.69
	TH1A TRAVEL-HOTEL	0.00	1,844.16	0.00	1,844.16
	TL2E TELEPHONE	0.00	2,232.90	0.00	2,232.90
	Sub Total ()	0.00	9,139.19	0.00	9,139.19
	Grand Total	0.00	9,139.19	0.00	9,139.19

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www.palomarfin.com

February 5, 2018

BILL SUMMARY

707500 Nevada Health Co-Op ("NHC")

September 1, 2017 – September 31, 2017

<u>Matter No. and Description</u>	<u>Fees</u>	<u>Costs</u>	<u>Total</u>
September 2017	\$18,785.00	\$0.00	\$18,785.00
Totals (1)	\$18,785.00	\$0.00	\$18,785.00

Palomar Financial, LC

NEVADA HEALTH CO-OP
PRIVILEGED AND CONFIDENTIAL
SUMMARY REPORT
PERIOD SEPTEMBER 2017

		Billable Hours	Billable Rate	September 2017 Billing
1	TIME KEEPER - Nicole Wilkins	26.25	\$250.00	\$6,562.50
2	TIME KEEPER - Robert Stebel	1.50	\$160.00	\$240.00
3	TIME KEEPER - Burnett Wallace	21.80	\$150.00	\$3,270.00
4	TIME KEEPER - Neda Khalaf	27.50	\$160.00	\$4,400.00
5	TIME KEEPER - Susan Roehm	7.00	\$150.00	\$1,050.00
6	TIME KEEPER - Gayathri Sivadasan	21.75	\$150.00	\$3,262.50
	GRAND TOTAL	105.80		\$18,785.00

Palomar Financial, LC
09/01/2017-09/30/2017
Client: Nevada Health Co-Op ("NHC")

Staff ID	Name	Description	Hours	Amount
NMW	Nicole Wilkins	Accounting Reports/Receivership Team Support	1.60	\$ 400.00
		Payroll & Employee Benefits	12.05	\$ 3,012.50
		Accounts Payable and Receivable	10.25	\$ 2,562.50
		Bank Account Administration/Reconciliation	2.35	\$ 587.50
		Sub Total (NMW)	26.25	\$ 6,562.50
RNS	Robert Stebel	Investment Accounting/Support	0.50	\$ 80.00
		Regulatory Responses/Compliance	0.75	\$ 120.00
		Other	0.25	\$ 40.00
		Sub Total (RNS)	1.50	\$ 240.00
BAW	Burnett Wallace	Payroll & Employee Benefits	21.80	\$ 3,270.00
		Sub Total (BAW)	21.80	\$ 3,270.00
NK	Neda Khalaf	Accounts Payable and Receivable	27.50	\$ 4,400.00
		Sub Total (NK)	27.50	\$ 4,400.00
SER	Susan Roehm	Reports/Replies to Policyholders, Creditors, Other Parties	7.00	\$ 1,050.00
		Sub Total (SER)	7.00	\$ 1,050.00
GS	Gayathri Sivadasan	Accounting Reports/Receivership Team Support	6.75	\$ 1,012.50
		Accounts Payable and Receivable	15.00	\$ 2,250.00
		Sub Total (GS)	21.75	\$ 3,262.50
	Grand Total		105.80	\$ 18,785.00

11401 Century Oaks Terrace
Suite 310
Austin, Texas 78758



PALOMAR FINANCIAL, LC

Telephone (512) 404-6555
Facsimile (512) 404-6530
Toll Free (877) 309-7105
www.palomarfin.com

February 22, 2018

BILL SUMMARY

707500 Nevada Health Co-Op ("NHC")

October 1, 2017 – October 31, 2017

Matter No. and Description	Fees	Costs	Total
October 2017	\$20,720.00	\$0.00	\$20,720.00
Totals (1)	\$20,720.00	\$0.00	\$20,720.00

Palomar Financial, LC

NEVADA HEALTH CO-OP
PRIVILEGED AND CONFIDENTIAL
SUMMARY REPORT
PERIOD OCTOBER 2017

		Billable Hours	Billable Rate	October 2017 Billing
1	TIME KEEPER - Nicole Wilkins	19.05	\$250.00	\$4,762.50
2	TIME KEEPER - Robert Stebel	3.50	\$160.00	\$560.00
3	TIME KEEPER - Burnett Wallace	23.10	\$150.00	\$3,465.00
4	TIME KEEPER - Neda Khalaf	30.75	\$160.00	\$4,920.00
5	TIME KEEPER - Susan Roehm	5.25	\$150.00	\$787.50
6	TIME KEEPER - Gayathri Sivadasan	41.50	\$150.00	\$6,225.00
	GRAND TOTAL	123.15		\$20,720.00

Palomar Financial, LC
10/01/2017-10/31/2017
Client: Nevada Health Co-Op ("NHC")

Staff ID	Name	Description	Hours	Amount
NMW	Nicole Wilkins	Accounting Reports/Receivership Team Support	2.80	\$ 700.00
		Payroll & Employee Benefits	6.85	\$ 1,712.50
		Accounts Payable and Receivable	6.45	\$ 1,612.50
		Bank Account Administration/Reconciliation	2.95	\$ 737.50
		Sub Total (NMW)	19.05	\$ 4,762.50
RNS	Robert Stebel	Regulatory Responses/Compliance	0.75	\$ 120.00
		Other	2.75	\$ 440.00
		Sub Total (RNS)	3.50	\$ 560.00
BAW	Burnett Wallace	Payroll & Employee Benefits	23.10	\$ 3,465.00
		Sub Total (BAW)	23.10	\$ 3,465.00
NK	Neda Khalaf	Accounts Payable and Receivable	30.75	\$ 4,920.00
		Sub Total (NK)	30.75	\$ 4,920.00
SER	Susan Roehm	Accounting Reports/Receivership Team Support	3.00	\$ 450.00
		IT Support & Administration	2.25	\$ 337.50
		Sub Total (SER)	5.25	\$ 787.50
GS	Gayathri Sivadasan	Accounting Reports/Receivership Team Support	16.50	\$ 2,475.00
		Accounts Payable and Receivable	25.00	\$ 3,750.00
		Sub Total (GS)	41.50	\$ 6,225.00
Grand Total			123.15	\$ 20,720.00



Invoice No. : 4636608
File No. : 170678.010100
Bill Date : November 10, 2017

Nevada Health Co-Op
Cantilo & Bennett, L.L.P.
c/o Mark F. Bennett, Esq.
11401 Century Oaks Terrace, Suite 300
Austin, TX 78758

INVOICE

Re: NHC in Receivership

Legal Services through October 31, 2017:

Total Fees: \$ 65,005.50

Expenses:

Conference Calls	4.55
Filing Fees	31.50
Local Travel	139.02
Messenger/Courier Services	3,175.00
Travel and Lodging Out of Town	812.46

Total Expenses: \$ 4,162.53

Current Invoice: \$ 69,168.03

MEF:TKK
Tax ID: 13-3613083

Greenberg Traurig, LLP | Attorneys at Law | 3773 Howard Hughes Parkway | Suite 400 North | Las Vegas, Nevada 89169
Tel 702.792.3773 | Fax 702.792.9002 | www.gtlaw.com

0475



Invoice No.: 4655307
File No. : 170678.010100
Bill Date : December 5, 2017

Nevada Health Co-Op
Cantilo & Bennett, L.L.P.
c/o Mark F. Bennett, Esq.
11401 Century Oaks Terrace, Suite 300
Austin, TX 78758

INVOICE

Re: NHC in Receivership

Legal Services through November 30, 2017:

Total Fees: \$ 56,719.50

Expenses:

Filing Fees 14.00
Messenger/Courier Services 277.00

Total Expenses: \$ 291.00

Current Invoice: \$ 57,010.50

MEF:TKK
Tax ID: 13-3613083

Greenberg Traurig, LLP | Attorneys at Law | 3773 Howard Hughes Parkway | Suite 400 North | Las Vegas, Nevada 89169
Tel 702.792.3773 | Fax 702.792.9002 | www.gtlaw.com

0476



Invoice No. : 4679869
File No. : 170678.010100
Bill Date : January 11, 2018

Nevada Health Co-Op
Cantilo & Bennett, L.L.P.
c/o Mark F. Bennett, Esq.
11401 Century Oaks Terrace, Suite 300
Austin, TX 78758

INVOICE

Re: NHC in Receivership

Legal Services through December 31, 2017:

Total Fees: \$ 78,638.50

Expenses:

Filing Fees 484.50
Professional & Legal 17,339.82

Total Expenses: \$ 17,824.32

Current Invoice: \$ 96,462.82

MEF:TKK
Tax ID: 13-3613083

Greenberg Traurig, LLP | Attorneys at Law | 3773 Howard Hughes Parkway | Suite 400 North | Las Vegas, Nevada 89169
Tel 702.792.3773 | Fax 702.792.9002 | www.gtlaw.com

0477



Invoice No. : 4680948
File No. : 170678.010200
Bill Date : January 11, 2018

Nevada Health Co-Op
Cantilo & Bennett, L.L.P.
c/o Mark F. Bennett, Esq.
11401 Century Oaks Terrace, Suite 300
Austin, TX 78758

Attn: Barbara Richardson
Cantilo & Bennett

INVOICE

Re: Nevada Health Co-Op/adv. Yiming Wu

Legal Services through December 31, 2017:

Total Fees:	\$	96.00
Current Invoice:	\$	<u>96.00</u>

EWS:TKK
Tax ID: 13-3613083



Invoice No.: 4706662
File No. : 170678.010100
Bill Date : February 16, 2018

Nevada Health Co-Op
Cantilo & Bennett, L.L.P.
c/o Mark F. Bennett, Esq.
11401 Century Oaks Terrace, Suite 300
Austin, TX 78758

INVOICE

Re: NHC in Receivership

Legal Services through January 31, 2018:

Total Fees: \$ 46,041.50

Expenses:

Deposition/Court Reporters	464.00
Filing Fees	3.50
Messenger/Courier Services	133.75

Total Expenses: \$ 601.25

Current Invoice: \$ 46,642.75

MEF:TKK
Tax ID: 13-3613083

Greenberg Traurig, LLP | Attorneys at Law | 3773 Howard Hughes Parkway | Suite 400 North | Las Vegas, Nevada 89169
Tel 702.792.3773 | Fax 702.792.9002 | www.gtlaw.com

0479



Invoice Remittance

Mark Bennett
Cantilo & Bennett, LLP
11401 Century Oaks Terrace, Suite 300
Austin, TX 78758
mfbennett@cb-firm.com

October 23, 2017
FTI Invoice No. 7459946
FTI Job No. 425623.0005
Terms NET 30
Federal I.D. No. 52-1261113
Currency: USD

Re: Nevada Health CO-OP in Receivership

Current Invoice Period: Charges Posted through September 30, 2017

Amount Due This Period

Professional Services	\$360.00
Expenses	<u>\$0.00</u>
Total Amount Due	<u>\$360.00</u>



Invoice Remittance

Mark Bennett
Cantilo & Bennett, LLP
11401 Century Oaks Terrace, Suite 300
Austin, TX 78758
mfbennett@cb-firm.com

March 15, 2018
FTI Invoice No. 7472553
FTI Job No. 425623.0005
Terms NET 30
Federal I.D. No. 52-1261113
Currency: USD

Re: Nevada Health CO-OP in Receivership

Current Invoice Period: Charges Posted through February 28, 2018

Amount Due This Period

Professional Services	\$720.00
Expenses	<u>\$0.00</u>
Total Amount Due	<u>\$720.00</u>

D'Antonio Technologies, L.L.C.
4300 South I-10 Service Road
Suite 101A
Metairie, LA 70001

Phone: 504-849-7000
Fax: 504-849-7001



Invoice
Invoice Number:
1398

Invoice Date:
Nov 1, 2017

Page:
1

Sold To:
Nevada Health CO-OP, in Liquidation
840 S. Rancho Drive #4-321
Las Vegas, NV 89106

Ship To:
Nevada Health CO-OP, in Liquidation
840 S. Rancho Drive #4-321
Las Vegas, NV 89106

Customer ID	Customer PO	Payment Terms	
NEV-001		Net 30 Days	
Sales Rep ID	Shipping Method	Ship Date	Due Date
			12/1/17

Quantity	Item	Description	Unit Price	Extension
		Information Technology Professional Consulting Services Through the month of October 2017 (see attached for details)		1,600.00

	Subtotal	1,600.00
	Sales Tax	
	Total Invoice Amount	1,600.00
Check/Credit Memo No:	Payment/Credit Applied	
	TOTAL	1,600.00

0482

D'Antonio Technologies, L.L.C.
4300 South I-10 Service Road
Suite 101A
Metairie, LA 70001

Phone: 504-849-7000
Fax: 504-849-7001



Invoice

Invoice Number:
1413

Invoice Date:
Feb 1, 2018

Page:
1

Sold To:

Nevada Health CO-OP, in Liquidation
840 S. Rancho Drive #4-321
Las Vegas, NV 89106

Ship To:

Nevada Health CO-OP, in Liquidation
840 S. Rancho Drive #4-321
Las Vegas, NV 89106

Customer ID	Customer PO	Payment Terms	
NEV-001		Net 30 Days	
Sales Rep ID	Shipping Method	Ship Date	Due Date
			3/3/18

Quantity	Item	Description	Unit Price	Extension
		Information Technology Professional Consulting Services Through the month of January 2018 (see attached for details)		550.00

Subtotal 550.00

Sales Tax

Total Invoice Amount 550.00

Payment/Credit Applied

TOTAL 550.00

Check/Credit Memo No:

D'Antonio Technologies, L.L.C.
4300 South I-10 Service Road
Suite 101A
Metairie, LA 70001

Phone: 504-849-7000
Fax: 504-849-7001



Invoice
Invoice Number:
1418

Invoice Date:
Mar 1, 2018

Page:
1

Sold To:
Nevada Health CO-OP, in Liquidation
840 S. Rancho Drive #4-321
Las Vegas, NV 89106

Ship To:
Nevada Health CO-OP, in Liquidation
840 S. Rancho Drive #4-321
Las Vegas, NV 89106

Customer ID	Customer PO	Payment Terms	
NEV-001		Net 30 Days	
Sales Rep ID	Shipping Method	Ship Date	Due Date
			3/31/18

Quantity	Item	Description	Unit Price	Extension
		Information Technology Professional Consulting Services Through the month of February 2018 (see attached for details)		5,150.00

	Subtotal	5,150.00
	Sales Tax	
	Total Invoice Amount	5,150.00
Check/Credit Memo No:	Payment/Credit Applied	
	TOTAL	5,150.00