

IN THE CIRCUIT COURT OF THE
SECOND JUDICIAL CIRCUIT, IN AND
FOR LEON COUNTY, FLORIDA

IN RE: The Receivership of
QUALITY HEALTH PLANS, INC.

CIVIL: 2011-CA-002245

DEPARTMENT'S MOTION FOR COURT TO SET CLAIMS BAR DATE

The Florida Department of Financial Services, as Receiver for Quality Health Plans, Inc. ("QHP" or "the Department"), files this Motion for Court to Set Claims Bar Date, and states as follows:

1. QHP was a health maintenance organization previously authorized pursuant to the Florida Insurance Code to transact business in the State of Florida.

2. On October 17, 2011, this Court entered an *Order Appointing the Florida Department of Financial Services as Receiver* placing QHP into receivership and on November 16, 2011, this Court entered an *Order Granting Receiver's Motion For Modification and Ordering Liquidation of Quality Health Plans, Inc.* ("Liquidation Order").

3. Pursuant to section 631.021(1), Florida Statutes, this Court has jurisdiction over the QHP receivership and is authorized to enter all necessary and/or proper orders to carry out the purpose of the Florida Insurers Rehabilitation and Liquidation Act, Part I, Chapter 631, Florida Statutes ("the Act").

4. The Act is to be interpreted liberally and equitably, as stated in section 631.001:

631.001 Title, construction, and purpose.—

(1) This part constitutes and may be cited as the "Insurers Rehabilitation and Liquidation Act.

(2) This part shall be liberally construed to effect the purposes of this part.

(3) The purposes of this part, which are integral elements of the regulation of the business of insurance and are of vital public interest and concern, are to:

(a) Protect the interests of policyholders, creditors, and other claimants and the public.

(b) Provide a comprehensive scheme for administering insurer receiverships....
(emphasis added)

5. As of the date of this Motion, distribution to claimants is anticipated to be a 100% distribution to Class 2 through 5, and a pro rata distribution of 10% to class 6, under the priority structure set forth in Section 631.271, Florida Statutes.

6. The Department requests the Court set a bar date in the QHP receivership for the filing of claims. A bar date will not only prevent any delay in the discharge date that might come from late-filed claims, but will also preserve the funds in this receivership for those claimants that timely filed claims and are entitled to a distribution.

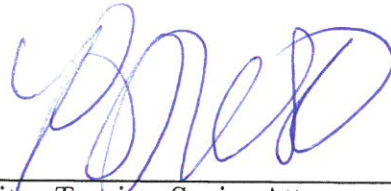
7. Having a claims bar date will also enable the Department to more efficiently process the final stages necessary to wrap up the QHP receivership, so that late claims do not interrupt and delay those tasks, such as preparation of the final distribution and discharge accounting, or create a delay in the discharge date by causing the filing of another interim claim report and accompanying objection period.

8. The proposed bar date would be the date of entry of the Order granting this Motion.

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WHEREFORE the Department of Financial Services as Receiver for QHP, requests the Court to grant this Motion and enter an Order setting a date certain after which no further claims may be filed.

Respectfully submitted this 22 day of April, 2019.



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