

**IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA**

STATE OF OKLAHOMA, ex rel.)	
JOHN D. DOAK, Insurance Commissioner,)	
)	
Plaintiff,)	
)	
v.)	Case No. CJ-2017-3547
)	
SENIORSURE HEALTH PLANS, INC.,)	<i>Judge: Aletia Haynes Timmons</i>
A licensed special purpose captive insurer in)	
the State of Oklahoma)	
)	
Defendant.)	

**NOTICE OF HEARING ON THE RECEIVER’S
FIRST REPORT ON CLAIMS EVALUATION AND
REQUEST FOR CONFIRMATION OF RECEIVER’S RECOMMENDATIONS**

You are hereby notified that on July 12, 2018, at 9 a.m., a hearing will be held before The Honorable Aletia Haynes Timmons, District Court Judge of Oklahoma County, Oklahoma, at which time the Receiver’s First Report on Claim Evaluation and Request for Confirmation of Receiver’s Recommendations (the “Receiver’s Report”) shall be heard. **The hearing will be conducted at the Oklahoma County Courthouse, 321 Park Avenue, Room 811, Oklahoma City, Oklahoma.**

You are receiving this Notice because the Receiver has evaluated your claim and such claims is ready for adjudication. The Exhibit attached to this Notice sets forth the Receiver’s recommendations to the Court in relation to your claim. The Receiver’s recommendations to this Court regarding your claim(s) and other claims set for hearing on the cited hearing date are set forth in the Receiver’s Report, which was filed on April 27, 2018. A copy of the Receiver’s Report is available on the website of the Oklahoma Receivership Office at www.okaro.org. Your claim has been assigned the Proof of Claim number (“POC#”) indicated on the attached

Exhibit. The attached Exhibit also provides information specific to your claim including the amount of your claim, the Receiver's recommendation as to the amount of your claim to be allowed, if any, and the Receiver's recommendation regarding the classification of your claim, which classification reflects the nature of your claim and the priority the Receiver recommends be given to your claim under Oklahoma law, 36 O.S. § 1927.1.

If you do not wish to object to the Receiver's recommendation, you are not required to take any action at this time. If you wish to object to the Receiver's recommendation, you must file a proper, written objection with the Court no later than June 8, 2018. To be a proper, written objection:

1. The objection must contain the case information located at the top of this Notice (State of Oklahoma, ex. rel. John Doak, Insurance Commissioner v. SeniorSure Health Plans, Inc. Case No. CJ-2017-3547, Judge Aletia Haynes Timmons);
2. The objection must be filed with the Clerk of the Oklahoma County District Court, 320 Robert S. Kerr Avenue, Oklahoma City, Oklahoma 73102, and a copy mailed to the Receiver's counsel at the address shown below;
3. The objection must be signed by the claimant or the claimant's representative;
4. The objection must be typewritten on a good grade of white paper size 8.5 by 11 inches, give the name, current address and telephone number of the claimant making the objection, including the name and position of the person signing the objection, if the claimant is a business, and;
5. The objection must state the exact grounds on which the objection is based and be accompanied by a concise brief that contains (a) a written statements of material facts as to which the objecting party contends no genuine issue exists verified by a person with knowledge of the facts; (b) references to supporting documentation submitted with the proof of claim; and (c) citation to applicable authority supporting the objection;
6. If you wish to present oral argument to the Court on your objection at the hearing, the objection must indicate your intention to appear at the hearing and make such oral arguments. Failure to expressly state an intention to make oral argument in your objection may be deemed by the Court to be a waiver of the right to oral argument.

Failure to file a timely and proper written objection as described above may result in your

objection being denied. If the Court approves your claim in whole or in part, it does not mean that you will actually receive the allowed amount as ordered by the Court. The amount of payment on your claim, if any, is dependent upon the class or priority the Court assigns to your claim based upon Oklahoma law, and the assets in the estate available for payment. Certain legal matters still pending before the Court may prevent the payment of claims for some time. Any questions regarding this Notice, the Receiver's Recommendations as to your claim or any of the other claims to be heard during the hearing on the date referenced above should be directed to the Receiver's Office. Contact for the Receiver's Office is set forth below:

Assistant Receiver's Office

Donna L. Wilson, CIR-ML
3613 NW 56th Street, Suite 330
Oklahoma City, OK 73112
Telephone: (405) 947-0022
Facsimile: (405) 947-0046

Receiver's Counsel Address

Ryan Leonard
Jason Reese
Edinger, Leonard & Blakley, PLLC
100 Park Avenue, Suite 500
Oklahoma City, OK 73102
Telephone: (405) 702-9900
Facsimile: (405) 605-8381

Respectfully submitted,

Ryan Leonard, OBA No. 19155
Jason Reese, OBA No. 20813
Edinger, Leonard & Blakley, PLLC
100 Park Avenue, Suite 500
Oklahoma City, OK 73102
(405) 702-9900
(405) 605-8381 facsimile

rleonard@leonard-law.net

**ATTORNEYS FOR RECEIVER
STATE OF OKLAHOMA, ex rel.
JOHN DOAK, INSURANCE COMMISSIONER**

-AND-

Barron B. Brown, OBA No. 31346
Sara A. Worten, OBA No. 21532
3613 NW 56th, Suite 330
Oklahoma City, OK 73112
(405) 947-0022 phone
(405) 947-0046 facsimile
barron.brown@oid.ok.gov

CERTIFICATE OF MAILING

I, hereby certify that on this ____ day of _____, 2018, I caused to be mailed a true and correct copy of the within and foregoing instrument by U.S. Mail postage prepare and/or electronic mail with written consent to:

George Gibbs, OBA No. 11843
601 S. Boulder, Suite 500
Tulsa, OK 74119

Dominick L. Lanzito
Peterson, Johnson & Murray Chicago, LLC
200 West Adams Street, Suite 2125
Chicago, IL 60606

PrimeSource Healthcare Systems, Inc.
Attn: David Fleming
2100 E. Lake Cook Road, Suite 1100
Buffalo Grove, IL 60089

Mucklough, LLC
c/o Tralee Portfolio Management, LLC
135 LaSalle Street, Suite 3914
Chicago, IL 60603

Oklahoma Insurance Department
Five Corporate Plaza
3625 NW 56th Street, Suite 100
Oklahoma City, OK 73112

Oklahoma Property & Casualty
Insurance Guaranty Association
2601 NW Expressway, Suite 330E
Oklahoma City, OK 73112

Ryan Leonard