

STATE OF VERMONT

SUPERIOR COURT
WASHINGTON UNIT

COMMISSIONER OF THE
DEPARTMENT OF FINANCIAL
REGULATION
PLAINTIFF,

v.

DOCTORS AND SURGEONS
NATIONAL RISK RETENTION GROUP
IC, INC.
RESPONDENT.

CIVIL DIVISION
DOCKET NO. 559-916 Wncv

**LIQUIDATOR'S STATUS REPORT, ANNUAL ACCOUNTING,
AND SEVENTH REPORT OF CLAIMS**

I, J. David Leslie, Special Deputy Liquidator, hereby submit this status report regarding the liquidation of Doctors and Surgeons National Risk Retention Group IC, Inc. ("DSNRRG" or the "Company"), annual accounting, and the Liquidator's Seventh Report of Claims which is attached hereto as Exhibit A.

1. **Background.** DSNRRG was placed in rehabilitation by the Court's Order for Rehabilitation of Doctors and Surgeons National Risk Retention Group IC, Inc. ("Rehabilitation Order") entered on October 6, 2016. On August 10, 2017, the Court entered its Order of Liquidation ("Liquidation Order") that, among other things, appointed the Commissioner of the Department of Financial Regulation as Liquidator ("Liquidator"), authorized him to appoint a special deputy liquidator, and approved the Plan of Liquidation. See Order of Liquidation ¶¶ 1, 5, 6, and 7. The Liquidator appointed me to serve as Special Deputy Liquidator on August 17, 2017.

2. Annual Accountings. As required by the liquidation statutes and the Liquidation Order, I have submitted annual accountings to the Court. The first annual accounting was approved by the Court on August 22, 2018, the second on September 5, 2019, the third on September 8, 2020, and the fourth on September 28, 2021. The fifth annual accounting is presented, below, at ¶ 9.

3. Status Reports. In addition to annual accountings, the Liquidator has filed semiannual status reports with the Court beginning on May 9, 2018. After the Liquidator's first status report, subsequent reports have been submitted approximately six months after each annual accounting to keep the Court regularly apprised of the work performed and plans going forward. The Court has entered orders approving each such status report.

4. Reports of Claims. As the Liquidator has investigated and resolved the claims filed against DSNRRG, he has submitted claim reports to the Court in connection with each status report. These claim reports advise of finally determined proofs of claim ("POCs"), together with the Liquidator's recommendations, for approval. See 8 V.S.A. §§ 7082(a) ("[T]he liquidator shall present to the court a report... of the claims against the insurer with recommendations") and 7082(b) ("The court may approve, disapprove, or modify the report on claims [filed] by the liquidator.") The Liquidator's first six claim reports were submitted on January 31, 2019, August 29, 2019, February 28, 2020, September 4, 2020, March 12, 2021, and September 28, 2021. Each has been approved by the Court.

5. Liquidation Website. All annual accountings, status reports, and reports of claims have been posted on the Company's former website (www.dsnrrg.com) to keep creditors and other interested parties apprised of progress in the liquidation proceeding. Other key liquidation records (e.g. POC forms) have been posted to the site as well.

6. First Interim Distribution. On August 29, 2019, the Liquidator filed his Motion for an Order Authorizing Distributions on Allowed Priority Class 1 Claims and an Interim Distribution on Allowed Class 3 Claims (“First Motion for Interim Distributions”) which requested authority to make a 100% distribution on allowed priority class 1 claims and a 20% interim distribution on allowed priority class 3 claims. See 8 V.S.A. §§ 7081 (establishing statutory priorities) and 7083 (describing the circumstances under which a distribution may be ordered). The Court granted the motion, entering its Order Authorizing Distribution on Allowed Priority Class 1 Claims and an Interim Distribution on Allowed Class 3 Claims on September 5, 2019.

7. Priority class 1 claims have been paid in full. See, *infra*, ¶ 10 (regarding withdrawal of certain class 1 claims). With regard to interim distributions on priority class 3 claims, the Liquidator’s authorization to make payment was “[c]ontingent upon having first received a federal priority act release from the United States”. *Id.*, ¶ iv. The Liquidator requested such a release in October of 2019 and one was provided by the United States in June of 2020.

8. Upon receipt of the federal priority act release, the Liquidator contacted claimants with allowed priority class 3 claims who would be entitled to receive disbursements in the 20% interim distribution.¹ The Liquidator provided each claimant with an interim distribution calculation, requested payment instructions, sought confirmation as to the status of any liens, and issued checks for interim distribution payments upon receipt of the necessary information. The

¹ As discussed in the Motion for Interim Distributions (see ¶¶ 9 and 20), during the course of rehabilitation, DSNRRG creditors with policy-related claims received payments that, in most cases, were equivalent to a 35% distribution. When making distributions in the liquidation proceeding, the estate is entitled to credit for such payments. Effectively, therefore, a claimant with an allowed priority class 3 claim that received a 35% distribution in rehabilitation will not receive further disbursements from the estate until the Court orders a class 3 distribution at a rate greater than 35%.

Liquidator has distributed a total of \$851,402.90 through this process to creditors with allowed priority class 3 claims.

ANNUAL ACCOUNTING

9. The Liquidator is required to file an annual accounting with the Court including the assets and liabilities of DSNRRG and all funds received or disbursed during the current period. See 8 V.S.A. § 7057(e); Liquidator Order, ¶ 4. A ledger showing all funds received or disbursed by DSNRRG between entry of the Liquidation Order and August 31, 2022, is attached as Exhibit B. A simplified DSNRRG balance sheet is presented below in Table 1.

Table 1 -- Simplified DSNRRG Balance Sheet as of August 31, 2022

ASSETS

Cash & cash equivalents	\$ 2,317,469
Credit for interim distribution in liquidation ²	851,403
Credit for payments in rehabilitation ³	840,000
Total Assets	\$ 4,012,478

LIABILITIES

Priority class 1	
Reserve for administrative expense	\$ 125,000
Priority class 3	
POCs allowed/presented for allowance	\$ 8,113,019
Reserve for POC 127 (see infra, ¶ 17)	930,605
Total class 3 claims	\$ 9,043,623
Total Class 1 & Class 3 liabilities	\$ 9,168,623

The asset figures presented in Table 1 reflect the balance of accounts controlled by the Liquidator (i.e. the marshalled assets of the estate) plus payments that DSNRRG made in rehabilitation or liquidation which may be applied in setoff. The liability figures reflect a substantially reduced reserve for administrative expense -- from more than \$450,000 in the prior

² The total amount of allowed priority 1 and priority class 3 claims are set forth as estate liabilities. The estate will be entitled to credit for interim distributions made on those claims when the time comes to make a final distribution.

³ As discussed above in note 1, when making distribution on certain priority class 3 claims, the estate will be entitled to credit for payments made during the course of DSNRRG's rehabilitation. The extent to which such credits can be applied in setoff depends upon the distributions made from the estate. The Liquidator had initially estimated that "the ultimate recovery on these claims will exceed \$275,000" and that figure has been revised upward as claims are determined. The Liquidator now projects that the figure may exceed \$840,000.

report to \$125,000 in the current report -- which has been made possible by a very significant reduction in the likelihood of claims-related litigation due to the near-completion of the claim determination process. See, *infra*, ¶¶ 17 and 18 (regarding resolution of the United States' claim and the establishment of a reserve for POC 127). The balance sheet includes no entries for priority classes 4-10 because estate assets will not be sufficient to pay priority class 3 claims in full so no distribution can be made on claims falling in the lower priority classes and the Liquidator has deferred making determinations as to the value of such claims. See 8 V.S.A. § 7081.

SEVENTH REPORT OF CLAIMS

10. Prior Reports of Claims. As discussed above (see ¶ 4), the Liquidator has filed and the Court has approved six prior reports of claims. Cumulatively, these reports included recommendations regarding 147 finally determined claims. The Court's approval of these reports crystalized the value and priority classification of those claims which, cumulatively, included one claim allowed in priority class 1 (a total value of \$2,640)⁴ and 86 claims allowed in priority class 3 (a total value of \$6,639,904.56). (The remaining 60 claims fall in priority classes 4-10 or were denied/withdrawn.)

11. Since the Sixth Report of Claims was filed on September 28, 2021, the Liquidator has issued notices of determination resolving three of the four claims that were then outstanding. See 8 V.S.A. §§ 7078(a) ("Within 60 days from the mailing of the notice [of determination], the claimant may file objections with the liquidator" and "[i]f no such filing is made, the claimant may not further object to the determination") and 7082(a) ("[T]he liquidator shall present to the

⁴ In November of 2020, the Liquidator learned that seven of the allowed priority class 1 claims had been filed in error. Specifically, the claims sought payment of outstanding invoices from defense counsel for work performed in rehabilitation which counsel later discovered had been paid by the Company's former third-party administrator. Counsel has withdrawn the relevant claims and priority class 1 liabilities are now limited to a single allowed claim with a total value of \$2,640.

court a report... of the claims against the insurer with recommendations”). These three claims are reported in the Liquidator’s Seventh Report of Claims, attached as Exhibit A hereto, together with the Liquidator’s recommendations. See 8 V.S.A. § 7082(a). By his Motion for Order Approving Seventh Report of Claims (filed herewith), the Liquidator requests that the Court enter an order approving the Seventh Report of Claims. See 8 V.S.A. § 7082(b) (“The court may approve, disapprove, or modify the report on claims [filed] by the liquidator.”).

STATUS REPORT

12. Filing of Proofs of Claim. The Liquidator established February 12, 2018 as the claim filing deadline. See Liquidation Order, ¶ 6.B. The Liquidator received 114 POCs before the February 12, 2018 deadline and has since received thirty-three late-filed claims for a total of 147 POCs received in this proceeding.⁵

13. Work of the Claims Adjudicator. On October 24, 2017, as contemplated by ¶ 2.c of the Plan of Liquidation, the Liquidator engaged Patrick McGrath, of McGrath Associates, Claims & Risk Services, Inc., to serve as claims adjudicator. The Liquidator has referred all POCs potentially presenting questions of medical malpractice to Mr. McGrath for investigation and valuation. Mr. McGrath has reviewed each claim and presented the Special Deputy Liquidator with an initial report providing background, analysis, and recommendations.

14. The Special Deputy Liquidator reviews Mr. McGrath’s reports and takes such further action as may be appropriate. These actions may include asking that claimants/policyholders produce supplemental information, monitoring the progress of underlying medical malpractice litigation, authorizing Mr. McGrath to initiate settlement discussions, or issuing notices of determination where settlement either is agreed or proves

⁵ Some POCs have been subdivided – e.g. POC 43 into POC 43D and 43I – to accommodate assignments or for other administrative purposes. Ultimately, therefore, the Liquidator expects to issue 153 notices of determination.

impractical. Mr. McGrath updated his reports and analysis regularly as additional information was received. Mr. McGrath has also supported the Liquidator by producing estimates of undetermined/unliquidated policyholder-level claims which he has updated on a periodic basis.

15. Medicare Reporting. DSNRRG, was a writer of liability insurance policies that may qualify as “primary plans” under the Medicare Secondary Payer (“MSP”) statute. See 42 U.S.C.A. § 1395y(b). This means that the Company has certain reporting responsibilities and, if it is discovered that the Medicare or Medicaid trust funds made conditional payments, DSNRRG may have a duty to reimburse the United States. See id.

16. The preparation and submission of MSP reports is a task presenting significant administrative challenges and requiring technical expertise. The Liquidator determined this work could be performed most efficiently by the vendor -- Western Litigation, Inc., now a division of Gallagher Basset Services, Inc. (“GB Specialty”) -- that had served as third-party administrator for DSNRRG prior to liquidation and which therefore had most of the relevant data in its systems and the necessary authorizations in place. The Liquidator therefore engaged GB Specialty to gather records, make the necessary queries, and submit records to the Centers for Medicare and Medicaid Services (“CMS”) regarding reportable claims. GB Specialty will continue to perform this work as needed through the remainder of the liquidation with flat rate charges based on the number of claims reportable to CMS.

17. Establishment of Reserve for POC 127. By May of 2022, the Liquidator had issued notices of determination regarding all but one of the policy-related claims filed in this proceeding. The dynamics of the underlying dispute are complicated because it involves multiple defendants and the DSNRRG insured may be unable to secure resolution except through final judgment or a global resolution involving parties not currently willing to consider settlement. The Liquidator has evaluated a number of options for resolving the DSNRRG-

related aspects of the matter and has determined that all would either present a high risk of claims-related litigation (and the associated dissipation of estate assets through administrative expense) or deprive the estate and its creditors of the potential for a favorable result in the underlying dispute (which would permit a greater distribution on allowed priority class 3 claims). The Liquidator has therefore concluded that the most efficient course of action would be to establish a reserve equal to policy limits, seek authority to make a second interim distribution that would release most estate assets to creditors, then make a final distribution when the dispute underlying POC 127 is eventually resolved.⁶ This approach minimizes administrative expense, accelerates distribution to estate creditors with allowed priority class 3 claims, and preserves for such creditors the possibility that POC 127 may ultimately be resolved for an amount less than policy limits such that some or all of the reserve may be released for general distribution.

18. Determination of the United States' POC. The United States submitted a POC asserting "unknown" claims that were specified as all "amounts owed to the United States and/or any federal agency or entity." The United States asserted that "[t]hese claims are entitled to first priority treatment pursuant to 31 U.S.C. § 3713" (the Federal Priority Act). The United States' claim therefore presents the standard issues appearing in any creditor's claim (the existence/value of a debt and the priority applicable under the insolvency statutes) as well as the Federal Priority Act issue which is unique to the United States.

19. With regard to the Federal Priority Act, the Liquidator previously entered into an agreement with the Department of Justice addressing the circumstances under which the United States might assert Federal Priority Act claims and setting forth provisions for the retention,

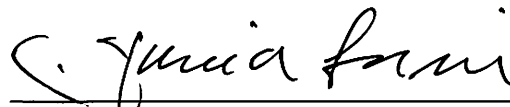
⁶ Applicable policy limits are \$1,000,000 and are subject to erosion by defense expenses. DSNRRG records reflect paid defenses of \$69,395.40 such that the remaining policy limit is \$930,604.60. The Liquidator establishes a reserve at this level solely for purposes of conservatism (it is the maximum amount in which the claim could possibly be allowed) so as to facilitate a further distribution to creditors with allowed priority class 3 claims and takes no position as to the merits of the underlying dispute.

inspection, and destruction of DSNRRG records. This agreement was not intended to create, enhance, diminish, or otherwise affect the United States' substantive claims, leaving those issues to be addressed through the determination of claims submitted in the liquidation proceeding.

20. The United States' POC does not identify a particular legal theory or facts which, if proven, would demonstrate a DSNRRG liability. The United States' POC is therefore similar to "placeholder" or "protective" claims often submitted by parties with unknown, inchoate, or potential claims. Liquidators typically attempt to hold such claims open as long as may be practical to maximize the opportunity for creditors to discover, develop, and substantiate their claims. The Liquidator held the United States' POC open until all other POCs (save POC 127) had been determined and the Liquidator had resolved to seek authority for a distribution. The Liquidator then determined the United States' claim for "unknown" federal claims could fall in either priority class 3 or priority class 4 and that these claims should be allowed in both classes for the amount of \$0 due to the fact that the United States had not submitted any documents, information, or identified claims in support of POC 106 and that, following independent investigation, the Liquidator was unaware of any outstanding DSNRRG obligations to the federal government. The United States acknowledged receipt of the notice of determination and waived its right to object such that POC 106 has been finally determined. See 8 V.S.A. § 7078(a) ("Within 60 days from the mailing of the notice [of claim determination], the claimant may file objections with the liquidator. If no such filing is made, the claimant may not further object to the determination.")

21. Next Steps. By the attached Motion for a Second Interim Distribution on Allowed Class 3 Claims and for the reasons set forth in the accompanying Affidavit of J. David Leslie, Special Deputy Liquidator, in Support of Motion for a Second Interim Distribution on Allowed Class 3 Claims, the Liquidator requests that the interim distribution percentage on

allowed priority class 3 claims be increased from 20% to 42.9%. If approved, this would allow the Liquidator to distribute substantially all estate assets not required for future administrative expense or potential distribution on POC 127. The Liquidator would then hold the proceeding open pending resolution of POC 127, determine that claim, and make a recommendation to the Court regarding the potential for a final distribution before requesting authority to escheat any unclaimed funds, destroy records, dissolve the corporation, and otherwise close this proceeding. The Liquidator will file his next report in January of 2023.



J. David Leslie
Special Deputy Liquidator

Dated: September 20, 2022.

Subscribed and sworn before me
this 20th day of September, 2022.



Notary Public
My commission expires:

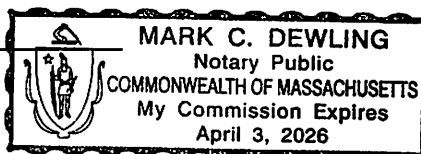


EXHIBIT A

Liquidator's Seventh Report of Claims
September 20, 2022

Claims Recommended for Allowance in Priority Class 3

<u>POC No.</u>	<u>Claimant Name</u>	<u>Claimant Address</u>	<u>Priority Class</u>	<u>Amount Allowed</u>	<u>Prior Payments</u>
86	Dr. Nayel Sayegh	944 N. Broadway, Yonkers, NY 10701	3	\$ 12,686.99	4,504.15
106	United States Dep't of Justice	1100 L. Street, NW, Rm. 10016, Washington, DC	3	0.00	--
Recommended for Allowance (Seventh Report of Claims)				\$ 12,686.99	4,504.15
Previously Allowed (First through Sixth Reports of Claims)				8,100,331.60	\$ 912,710.56
Total: Priority Class 3				\$ 8,113,018.59	\$ 917,214.71

Claims Recommended for Allowance in Priority Class 4

<u>POC No.</u>	<u>Claimant Name</u>	<u>Claimant Address</u>	<u>Priority Class</u>	<u>Amount Allowed</u>	<u>Prior Payments</u>
106	United States Dep't of Justice	1100 L. Street, NW, Rm. 10016, Washington, DC	4	0.00	--
Total: Priority Class 4				\$ 0.00	--

Claims Denied or Withdrawn

<u>POC No.</u>	<u>Claimant Name</u>	<u>Claimant Address</u>	<u>Priority Class</u>	<u>Amount Allowed</u>	<u>Prior Payments</u>
71	Engel Nicasio	383 Warburton Ave., Yonkers, NY 10701	n/a	n/a	n/a

EXHIBIT B

All Deposits and Distributions from DSNRRG's Accounts
between August 10, 2017 and August 31, 2022

Date	Payee/Payor	Description	Amount
9/8/2017	Abbi Smith	Vendor -- Credentialing Requests	\$ 300.00
9/8/2017	Compu-Tecs, LLC	IT/Communication Fees	\$ 1,390.99
9/8/2017	Merlinos & Associates, Inc.	Actuarial Services	\$ 1,428.75
9/8/2017	Rackemann Sawyer & Brewster	Professional Services	\$ 10,347.50
9/8/2017	Western Litigation	Indemnity Settlement (Mirvis Claim)	\$ 7,000.00
10/4/2017	Mark Barwick	Vendor -- Underwriting Support	\$ 1,225.00
10/30/2017	Abbi Smith	Vendor -- Credentialing Requests	\$ 400.00
10/30/2017	Abbi Smith	Vendor -- Credentialing Requests	\$ 487.50
10/30/2017	Compu-Tecs, LLC	IT/Communication Fees	\$ 985.00
10/30/2017	Compu-Tecs, LLC	IT/Communication Fees	\$ 985.00
10/30/2017	Rackemann Sawyer & Brewster	Professional Services	\$ 4,974.19
11/6/2017	Abbi Smith	Vendor -- Credentialing Requests	\$ 287.50
11/6/2017	Western Litigation	TPA Services	\$ 75,396.47
11/29/2017	Agee Fisher Barrett	Tax Preparation Services (2016)	\$ 8,052.00
11/29/2017	Compu-Tecs, LLC	IT/Communication Fees	\$ 985.00
11/29/2017	Western Litigation	TPA Services	\$ 66,243.22
11/29/2017	Western Litigation	TPA Services	\$ 11,704.41
1/3/2018	Abbi Smith	Vendor -- Credentialing Requests	\$ 350.00
1/3/2018	Compu-Tecs, LLC	IT/Communication Fees	\$ 985.00
1/3/2018	McGrath Assoc. Claims & Risk Serv.	Claim Adjudicator Services	\$ 5,675.00
1/3/2018	Rackemann Sawyer & Brewster	Professional Services	\$ 6,060.83
1/3/2018	Rackemann Sawyer & Brewster	Professional Services	\$ 4,602.78
1/3/2018	Rackemann Sawyer & Brewster	Professional Services	\$ 6,723.86
1/3/2018	Western Litigation	TPA Services	\$ 49,853.84
1/17/2018	CT Corporation	Services of Process Fees	\$ 66.00
1/17/2018	CT Corporation	VT Registered Agent Service	\$ 439.00
1/17/2018	Western Litigation	TPA Services	\$ 20,000.00
1/24/2018	McGrath Assoc. Claims & Risk Serv.	Claim Adjudicator Services	\$ 937.50
1/24/2018	Western Litigation	TPA Services	\$ 52,462.86
1/25/2018	Abbi Smith	Vendor -- Credentialing Requests	\$ 50.00
1/31/2018	CT Corporation	Services of Process Fees	\$ 380.00
1/31/2018	Rackemann Sawyer & Brewster	Professional Services	\$ 3,040.15
1/31/2018	Western Litigation	TPA Services	\$ 6,217.06
1/31/2018	Western Litigation	Administrative Services	\$ 1,000.00
1/31/2018	Western Litigation	Maine/Nevada Fees	\$ 489.25
2/6/2018	CT Corporation	Maine/Nevada State fees	\$ 489.25
2/6/2018	McGrath Assoc. Claims & Risk Serv.	Claim Adjudicator Services	\$ 1,237.50
3/20/2018	Abbi Smith	Vendor -- Credentialing Requests	\$ 200.00

Date	Payee/Payor	Description	Amount
3/20/2018	Abbi Smith	Vendor -- Credentialing Requests	\$ 225.00
3/20/2018	Compu-Tecs, LLC	IT/Communication Fees	\$ 985.00
3/20/2018	Compu-Tecs, LLC	IT/Communication Fees	\$ 985.00
3/20/2018	McGrath Assoc. Claims & Risk Serv.	Claim Adjudicator Services	\$ 3,225.00
3/20/2018	Rackemann Sawyer & Brewster	Professional Services	\$ 2,669.33
3/20/2018	Western Litigation	ALAE -- 1.1.18 to 2.15.18	\$ 4,278.21
3/20/2018	Western Litigation	Administrative Services	\$ 1,000.00
4/20/2018	Abbi Smith	Vendor -- Credentialing Requests	\$ 200.00
4/20/2018	McGrath Assoc. Claims & Risk Serv.	Claim Adjudicator Services	\$ 4,775.00
4/20/2018	Rackemann Sawyer & Brewster	Professional Services	\$ 8,418.51
4/20/2018	Rackemann Sawyer & Brewster	Professional Services	\$ 11,781.61
4/20/2018	Western Litigation	ALAE -- 2.15.18 to 3.15.18	\$ 5,094.95
4/20/2018	Western Litigation	Administrative Services	\$ 1,000.00
6/13/2018	McGrath Assoc. Claims & Risk Serv.	Claim Adjudicator Services	\$ 9,737.50
6/15/2018	Abbi Smith	Vendor -- Credentialing Requests	\$ 375.00
6/15/2018	Alterna, LLC	Management Fees -- 2018	\$ 12,500.00
6/15/2018	Alterna, LLC	Management Fees -- 2017	\$ 12,500.00
6/15/2018	Compu-Tecs, LLC	IT/Communication Fees	\$ 985.00
6/15/2018	Compu-Tecs, LLC	IT/Communication Fees	\$ 985.00
6/15/2018	Rackemann Sawyer & Brewster	Professional Services	\$ 3,843.98
6/15/2018	Rackemann Sawyer & Brewster	Professional Services	\$ 2,258.25
6/15/2018	Western Litigation	Administrative Services	\$ 1,000.00
6/15/2018	Western Litigation	Administrative Services	\$ 1,000.00
7/23/2018	Abbi Smith	Vendor -- Credentialing Requests	\$ 150.00
7/23/2018	Compu-Tecs, LLC	IT/Communication Fees	\$ 985.00
7/23/2018	McGrath Assoc. Claims & Risk Serv.	Claim Adjudicator Services	\$ 3,750.00
7/23/2018	Rackemann Sawyer & Brewster	Professional Services	\$ 5,122.10
7/23/2018	Western Litigation	Administrative Services	\$ 1,000.00

Distributions 9/8/17 through 7/31/18 \$ 454,281.85

8/14/2018	Alterna, LLC	Management Fees -- 2018	\$ 12,500.00
8/14/2018	Compu-Tecs, LLC	IT/Communication	\$ 2,955.00
8/14/2018	McGrath Assoc. Claims & Risk Serv.	Claim Adjudicator Services	\$ 8,200.50
8/14/2018	Western Litigation	Administrative Services	\$ 1,000.00
9/20/2018	Abbi Smith	Vendor -- Credentialing Requests	\$ 412.50
9/20/2018	Compu-Tecs, LLC	IT/Communication	\$ 985.00
9/20/2018	McGrath Assoc. Claims & Risk Serv.	Claim Adjudicator Services	\$ 2,226.21
9/20/2018	Rackemann Sawyer & Brewster	Professional Services	\$ 18,548.26
9/20/2018	Western Litigation	Administrative Services	\$ 1,000.00
10/18/2018	Abbi Smith	Vendor -- Credentialing Requests	\$ 250.00
10/18/2018	Compu-Tecs, LLC	IT/Communication	\$ 985.00
10/18/2018	Johnson Lambert & Co	Tax Return Preparation	\$ 4,500.00

Date	Payee/Payor	Description	Amount
10/18/2018	McGrath Assoc. Claims & Risk Serv.	Claim Adjudicator Services	\$ 1,175.00
10/18/2018	Western Litigation	Administrative Services	\$ 1,000.00
10/22/2018	Alterna, LLC	Management Fees – 2018	\$ 12,500.00
10/22/2018	Western Litigation	Administrative Services	\$ 1,000.00
11/20/2018	Abbi Smith	Vendor -- Credentialing Requests	\$ 175.00
11/20/2018	Compu-Tecs, LLC	IT/Communication	\$ 985.00
11/20/2018	McGrath Assoc. Claims & Risk Serv.	Claim Adjudicator Services	\$ 3,837.50
11/20/2018	Rackemann Sawyer & Brewster	Professional Services	\$ 5,979.52
11/20/2018	Western Litigation	Administrative Services	\$ 1,000.00
12/21/2018	Abbi Smith	Vendor -- Credentialing Requests	\$ 250.00
12/21/2018	Compu-Tecs, LLC	IT/Communication	\$ 985.00
12/21/2018	McGrath Assoc. Claims & Risk Serv.	Claim Adjudicator Services	\$ 3,000.00
12/21/2018	Rackemann Sawyer & Brewster	Professional Services	\$ 3,520.07
12/21/2018	Western Litigation	Administrative Services	\$ 1,000.00
1/8/2019	Alterna, LLC	Management Fees – 2018	\$ 12,500.00
1/8/2019	Compu-Tecs, LLC	IT/Communication	\$ 235.00
1/11/2019	Abbi Smith	Vendor -- Credentialing Requests	\$ 125.00
1/11/2019	Compu-Tecs, LLC	IT/Communication	\$ 750.00
1/11/2019	McGrath Assoc. Claims & Risk Serv.	Claim Adjudicator Services	\$ 2,088.50
2/12/2019	Abbi Smith	Vendor -- Credentialing Requests	\$ 150.00
2/12/2019	Compu-Tecs, LLC	IT/Communication	\$ 985.00
2/12/2019	McGrath Assoc. Claims & Risk Serv.	Claim Adjudicator Services	\$ 2,888.50
2/12/2019	Rackemann Sawyer & Brewster	Professional Services	\$ 12,392.52
3/8/2019	Abbi Smith	Vendor -- Credentialing Requests	\$ 200.00
3/8/2019	McGrath Assoc. Claims & Risk Serv.	Claim Adjudicator Services	\$ 5,687.50
3/26/2019	Compu-Tecs, LLC	IT/Communication	\$ 985.00
3/26/2019	Rackemann Sawyer and Brewster	Professional Services	\$ 2,779.73
4/12/2019	Abbi Smith	Vendor -- Credentialing Requests	\$ 150.00
4/12/2019	Alterna, LLC	Management Fees – 2019	\$ 12,500.00
4/12/2019	Compu-Tecs, LLC	IT/Communication	\$ 985.00
4/12/2019	McGrath Assoc. Claims & Risk Serv.	Claim Adjudicator Services	\$ 2,950.00
5/13/2019	Abbi Smith	Vendor -- Credentialing Requests	\$ 137.50
5/13/2019	Compu-Tecs, LLC	IT/Communication	\$ 985.00
5/13/2019	McGrath Assoc. Claims & Risk Serv.	Claim Adjudicator Services	\$ 62.50
5/13/2019	Rackemann Sawyer & Brewster	Professional Services	\$ 5,000.13
6/3/2019	Rackemann Sawyer & Brewster	Professional Services	\$ 8,127.32
6/21/2019	McGrath Assoc. Claims & Risk Serv.	Claim Adjudicator Services	\$ 2,200.00
6/21/2019	Rackemann Sawyer and Brewster	Professional Services	\$ 3,888.10
6/24/2019	Compu-Tecs, LLC	IT/Communication	\$ 985.00
7/22/2019	Abbi Smith	Vendor -- Credentialing Requests	\$ 175.00
7/22/2019	Johnson Lambert & Co	Tax Return Preparation	\$ 4,600.00
7/22/2019	McGrath Assoc. Claims & Risk Serv.	Claim Adjudicator Services	\$ 4,800.00

Date	Payee/Payor	Description	Amount
7/22/2019	Rackemann Sawyer & Brewster	Professional Services	\$ 6,406.20
7/29/2019	Compu-Tecs, LLC	IT/Communication	\$ 985.00

Distributions 8/1/18 to 7/31/19 \$ 186,673.06

8/21/2019	McGrath Assoc. Claims & Risk Serv.	Claim Adjudicator Services	\$ 3,775.00
8/21/2019	Rackemann Sawyer & Brewster	Professional Services	\$ 11,641.10
8/23/2019	Alterna, LLC	Management Fee -- 2019	\$ 12,500.00
8/23/2019	Compu-Tecs, LLC	IT/Communication Fees	\$ 985.00
9/23/2019	McGrath Assoc. Claims & Risk Serv.	Claim Adjudicator Services	\$ 2,712.50
9/23/2019	Rackemann Sawyer & Brewster	Professional Services	\$ 8,801.50
9/26/2019	Compu-Tecs, LLC	IT/Communication Fees	\$ 985.00
10/17/2019	Abbi Smith	Vendor -- Credentialing Requests	\$ 225.00
10/17/2019	Alterna, LLC	Management Fee -- 2020	\$ 12,500.00
10/17/2019	Compu-Tecs, LLC	IT/Communication Fees	\$ 985.00
10/17/2019	McGrath Assoc. Claims & Risk Serv.	Claim Adjudicator Services	\$ 950.00
10/17/2019	Rackemann Sawyer & Brewster	Professional Services	\$ 5,733.48
12/9/2019	Compu-Tecs, LLC	IT/Communication Fees	\$ 985.00
12/9/2019	McGrath Assoc. Claims & Risk Serv.	Claim Adjudicator Services	\$ 1,237.50
12/9/2019	Rackemann Sawyer & Brewster	Professional Services	\$ 14,749.65
12/23/2019	Compu-Tecs, LLC	IT/Communication Fees	\$ 985.00
12/23/2019	McGrath Assoc. Claims & Risk Serv.	Claim Adjudicator Services	\$ 3,125.00
12/23/2019	Rackemann Sawyer & Brewster	Professional Services	\$ 13,091.39
1/24/2020	Compu-Tecs, LLC	IT/Communication Fees	\$ 985.00
1/24/2020	McGrath Assoc. Claims & Risk Serv.	Claim Adjudicator Services	\$ 1,425.00
1/24/2020	Rackemann Sawyer & Brewster	Professional Services	\$ 5,507.06
2/20/2020	Abbi Smith	Vendor -- Credentialing Requests	\$ 350.00
2/20/2020	Alterna, LLC	Management Fees -- 2020	\$ 1,181.25
2/20/2020	Compu-Tecs, LLC	IT/Communication Fees	\$ 985.00
2/20/2020	McGrath Assoc. Claims & Risk Serv.	Claim Adjudicator Services	\$ 4,412.50
2/20/2020	Rackemann Sawyer & Brewster	Professional Services	\$ 6,152.38
3/9/2020	Leahy & Johnson, P.C.	Interim Distribution -- Class 1	\$ 2,640.00
3/30/2020	Compu-Tecs, LLC	IT/Communication Fees	\$ 985.00
3/30/2020	McGrath Assoc. Claims & Risk Serv.	Claim Adjudicator Services	\$ 2,687.50
3/30/2020	Rackemann Sawyer & Brewster	Professional Services	\$ 6,196.38
4/15/2020	Compu-Tecs, LLC	IT/Communication Fees	\$ 725.00
4/15/2020	McGrath Assoc. Claims & Risk Serv.	Claim Adjudicator Services	\$ 3,762.50
4/15/2020	Rackemann Sawyer & Brewster	Professional Services	\$ 2,538.20
5/21/2020	Compu-Tecs, LLC	IT/Communication Fees	\$ 725.00
5/21/2020	McGrath Assoc. Claims & Risk Serv.	Claim Adjudicator Services	\$ 1,750.00
5/21/2020	Rackemann Sawyer & Brewster	Professional Services	\$ 8,283.10
6/18/2020	Compu-Tecs, LLC	IT/Communication Fees	\$ 725.00
6/18/2020	Johnson Lambert LLP	Tax Return Preparation	\$ 1,550.00

Date	Payee/Payor	Description	Amount
6/18/2020	McGrath Assoc. Claims & Risk Serv.	Claim Adjudicator Services	\$ 3,287.50
6/18/2020	Rackemann Sawyer & Brewster	Professional Services	\$ 5,475.00

Distributions 8/1/19 to 7/31/20 \$ 158,295.49

8/4/2020	Alterna, LLC	Management Fees	\$ 810.00
8/4/2020	Compu-Tecs, LLC	IT/Communication Fees	\$ 725.00
8/4/2020	Johnson Lambert LLP	Tax Return Preparation	\$ 1,550.00
8/4/2020	McGrath Assoc. Claims & Risk Serv.	Claim Adjudicator Services	\$ 2,762.50
8/4/2020	Rackemann Sawyer & Brewster	Professional Services	\$ 4,929.30
8/5/2020	McGrath Assoc. Claims & Risk Serv.	Claim Adjudicator Services	\$ 1,475.00
8/7/2020	Diana Glasser, MD	Interim Distribution -- Class 3	\$ 8,193.42
8/7/2020	Lubell & Rosen	Interim Distribution -- Class 3	\$ 3,962.53
8/7/2020	Manuel DelCharco, Jr., M.D.	Interim Distribution -- Class 3	\$ 42,017.08
8/7/2020	Mark Szaflarski, P.C.	Interim Distribution -- Class 3	\$ 55,000.00
8/7/2020	Morgan & Morgan	Interim Distribution -- Class 3	\$ 50,000.00
8/7/2020	Reynolds & Reynolds, P.L.	Interim Distribution -- Class 3	\$ 10,000.00
8/7/2020	Schuler, Halvorson, Weisser, Zoeller & Overbeck	Interim Distribution -- Class 3	\$ 50,000.00
8/7/2020	Silva & Silva, Esq	Interim Distribution -- Class 3	\$ 40,000.00
8/7/2020	SuSrap Song, MD	Interim Distribution -- Class 3	\$ 10,909.74
8/7/2020	Thomas M. Paris, P.C.	Interim Distribution -- Class 3	\$ 1,000.00
8/21/2020	Compu-Tecs, LLC	IT/Communication Fees	\$ 725.00
8/21/2020	Rackemann Sawyer & Brewster	Professional Services	\$ 3,418.50
8/21/2020	Compu-Tecs, LLC	IT/Communication Fees	\$ 725.00
8/21/2020	Rackemann Sawyer & Brewster	Professional Services	\$ 3,418.50
9/16/2020	Alterna, LLC	Management Fees	\$ 1,181.25
9/16/2020	Compu-Tecs, LLC	IT/Communication Fees	\$ 725.00
9/16/2020	McGrath Assoc. Claims & Risk Serv.	Claim Adjudicator Services	\$ 862.50
9/16/2020	Rackemann Sawyer & Brewster	Professional Services	\$ 5,965.50
10/23/2020	Alterna, LLC	Management Fees	\$ 6,827.50
10/23/2020	Compu-Tecs, LLC	IT/Communication Fees	\$ 725.00
10/23/2020	McGrath Assoc. Claims & Risk Serv.	Claim Adjudicator Services	\$ 1,137.50
10/23/2020	Rackemann Sawyer & Brewster	Professional Services	\$ 3,985.00
10/28/2020	Wells Fargo Bank	Wire Service Fee	\$ 15.00
11/16/2020	McGrath Assoc. Claims & Risk Serv.	Claim Adjudicator Services	\$ 1,212.50
11/16/2020	Rackemann Sawyer & Brewster	Professional Services	\$ 1,779.50
12/15/2020	Compu-Tecs, LLC	IT/Communication Fees	\$ 725.00
12/15/2020	Compu-Tecs, LLC	IT/Communication Fees	\$ 725.00
12/15/2020	McGrath Assoc. Claims & Risk Serv.	Claim Adjudicator Services	\$ 187.50
12/15/2020	Rackemann Sawyer & Brewster	Professional Services	\$ 1,292.50
2/2/2021	Alterna, LLC	Management Fees	\$ 2,500.00
2/2/2021	Compu-Tecs, LLC	IT/Communication Fees	\$ 350.00

Date	Payee/Payor	Description	Amount
2/2/2021	Johnson Lambert LLP	Tax Return Preparation	\$ 1,600.00
2/2/2021	McGrath Assoc. Claims & Risk Serv.	Claim Adjudicator Services	\$ 887.50
2/2/2021	Rackemann Sawyer & Brewster	Professional Services	\$ 732.50
2/19/2021	Compu-Tecs, LLC	IT/Communication Fees	\$ 350.00
2/19/2021	Rackemann Sawyer & Brewster	Professional Services	\$ 6,075.00
2/19/2021	Colling, Gilbert, Wright & Carter	Interim Distribution -- Class 3	\$ 30,000.00
2/19/2021	Driggers, Schultz & Herbst, P.C.	Interim Distribution -- Class 3	\$ 10,000.00
2/19/2021	Hesham El Mokadem, M.D.	Interim Distribution -- Class 3	\$ 38,291.51
3/25/2021	McGrath Assoc. Claims & Risk Serv.	Claim Adjudicator Services	\$ 2,212.50
3/25/2021	McGrath Assoc. Claims & Risk Serv.	Claim Adjudicator Services	\$ 1,253.75
3/25/2021	Rackemann Sawyer & Brewster	Professional Services	\$ 7,045.50
4/30/2021	Compu-Tecs, LLC	IT/Communication Fees	\$ 350.00
4/30/2021	Compu-Tecs, LLC	IT/Communication Fees	\$ 350.00
4/30/2021	McGrath Assoc. Claims & Risk Serv.	Claim Adjudicator Services	\$ 1,400.00
4/30/2021	Rackemann Sawyer & Brewster	Professional Services	\$ 5,113.11
5/21/2021	Johnson Lambert LLP	Tax Return Preparation	\$ 1,650.00
5/21/2021	McGrath Assoc. Claims & Risk Serv.	Claim Adjudicator Services	\$ 1,775.00
5/21/2021	Rackemann Sawyer & Brewster	Professional Services	\$ 2,881.50
5/27/2021	Law Offices of Joseph M. Lichtenstein, P.C.	Interim Distribution -- Class 3	\$ 253,069.12
6/21/2021	Compu-Tecs, LLC	IT/Communication Fees	\$ 350.00
6/21/2021	McGrath Assoc. Claims & Risk Serv.	Claim Adjudicator Services	\$ 2,787.50
6/21/2021	Rackemann Sawyer & Brewster	Professional Services	\$ 13,650.50
6/23/2021	Wells Fargo Bank	Bank Fees	\$ 15.00
7/2/2021	NFP Management Corp.	Management Fees	\$ 2,500.00
7/2/2021	NFP Management Corp.	Management Fees	\$ 2,500.00
7/27/2021	McGrath Assoc. Claims & Risk Serv.	Claim Adjudicator Services	\$ 775.00
7/27/2021	Rackemann Sawyer & Brewster	Professional Services	\$ 6,642.00

Distributions 8/1/20 to 7/31/21 \$ 716,074.81

8/12/2021	Compu-Tecs, LLC	IT/Communication Fees	\$ 350.00
8/12/2021	Compu-Tecs, LLC	IT/Communication Fees	\$ 350.00
8/12/2021	McGrath Assoc. Claims & Risk Serv.	Claim Adjudicator Services	\$ 900.00
8/12/2021	Rackemann Sawyer & Brewster	Professional Services	\$ 2,346.55
8/12/2021	Medicare	Interim Distribution -- Class 3	\$ 8,979.10
9/28/2021	McGrath Assoc. Claims & Risk Serv.	Professional Services	\$ 375.00
9/28/2021	NFP Management Corp.	Management Fees	\$ 2,500.00
9/28/2021	Rackemann Sawyer & Brewster	Professional Services	\$ 569.50
10/27/2021	Compu-Tecs Technology, LLC	IT/Communication Fees	\$ 350.00
10/27/2021	Compu-Tecs Technology, LLC	IT/Communication Fees	\$ 350.00
10/27/2021	Johnson Lambert LLP	Tax Return Preparation	\$ 3,290.00
10/27/2021	McGrath Assoc. Claims & Risk Serv.	Claim Adjudicator Services	\$ 200.00

Date	Payee/Payor	Description	Amount
10/27/2021	Rackemann Sawyer & Brewster	Professional Services	\$ 3,359.50
12/8/2021	Compu-Tecs Technology, LLC	IT/Communication Fees	\$ 350.00
12/8/2021	McGrath Assoc. Claims & Risk Serv.	Claim Adjudicator Services	\$ 375.00
12/8/2021	Rackemann Sawyer & Brewster	Professional Services	\$ 1,357.50
12/29/2021	Feinstein & Naishtut, LLP	Interim Distribution -- Class 3	\$ 7,000.00
12/29/2021	Mark Green	Interim Distribution -- Class 3	\$ 100,000.00
12/29/2021	Smith, Sovik, Kendrick & Sugnet, PC	Interim Distribution -- Class 3	\$ 25,000.00
12/29/2021	NFP Management Corp.	Management Fees	\$ 2,500.00
12/29/2021	Rackemann Sawyer & Brewster	Professional Services	\$ 2,147.91
12/30/2021	Mark Rozell, Esq.	Interim Distribution -- Class 3	\$ 10,532.69
12/30/2021	Mark Rozell, Esq.	Interim Distribution -- Class 3	\$ 5,041.52
12/30/2021	Mark Rozell, Esq.	Interim Distribution -- Class 3	\$ 10,000.00
2/10/2022	Verrill Dana LLP	Professional Services	\$ 3,071.00
2/11/2022	Compu-Tecs Technology, LLC	IT/Communication Fees	\$ 350.00
2/11/2022	Compu-Tecs Technology, LLC	IT/Communication Fees	\$ 350.00
2/11/2022	McGrath Assoc. Claims & Risk Serv.	Claim Adjudicator Services	\$ 75.00
2/11/2022	Rackemann Sawyer & Brewster	Professional Services	\$ 1,596.50
6/7/2022	Compu-Tecs Technology, LLC	IT/Communication Fees	\$ 350.00
6/7/2022	Compu-Tecs Technology, LLC	IT/Communication Fees	\$ 350.00
6/7/2022	Compu-Tecs Technology, LLC	IT/Communication Fees	\$ 350.00
6/7/2022	Compu-Tecs Technology, LLC	IT/Communication Fees	\$ 350.00
6/7/2022	NFP Management Corp.	Management Fees	\$ 2,500.00
6/7/2022	Verrill Dana LLP	Professional Services	\$ 1,946.00
6/7/2022	Verrill Dana LLP	Professional Services	\$ 1,297.50
6/7/2022	Verrill Dana LLP	Professional Services	\$ 572.50
6/7/2022	Verrill Dana LLP	Professional Services	\$ 6,297.00
6/7/2022	Harvey Coopersmith	Interim Distribution -- Class 3	\$ 82,406.19
6/22/2022	NFP Management Corp.	Management Fees	\$ 2,500.00
8/4/2022	Verrill Dana LLP	Professional Services	\$ 12,090.00
8/5/2022	Compu-Tecs Technology, LLC	IT/Communication Fees	\$ 350.00
8/5/2022	Compu-Tecs Technology, LLC	IT/Communication Fees	\$ 350.00

Distributions 8/1/21 to 8/31/22 \$ 305,375.96