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Special Deputy Receiver of
Bright Healthcare Insurance Company of Texas**

CERTIFICATE OF SERVICE

I certify that on December 16, 2024, a true and correct copy of this SPECIAL DEPUTY RECEIVER'S QUARTERLY FINANCIAL REPORT AND SUMMARY STATEMENT OF EXPENSES (SEPTEMBER 1, 2024 TO NOVEMBER 30, 2024) was served pursuant to the Order of Reference, Texas Rules of Civil Procedure, TEX. INS. CODE ANN. SEC. 443.007(d) and the Court's order on electronic service on the following by email, except as specifically otherwise noted.

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Special Procedures Branch

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Austin, Texas 78701

/s/ Greg Pierce

Gregory A. Pierce

**Bright Healthcare Insurance Company of Texas
Statement of Expenses**

**For Period Ending
11/30/24**

	Total Sep	Total Oct	Total Nov	Total Quarter
SDR				
Cantilo & Bennett, LLP				
Primary Responsible	36,608.00	39,286.00	26,026.00	101,920.00
Primary Responsible - Travel	0.00	0.00	0.00	0.00
SDR Administration Partner/Attorney	1,872.00	1,924.00	0.00	3,796.00
SDR Administration Partner/Attorney - Travel	0.00	0.00	0.00	0.00
SDR Administration Partner/Attorney	52.00	156.00	260.00	468.00
SDR Administration	220.00	860.00	1,760.00	2,840.00
SDR Administration	23,040.00	25,060.00	17,100.00	65,200.00
Receivership Specialist	6,114.75	10,268.75	4,084.25	20,467.75
Receivership Specialist	0.00	0.00	0.00	0.00
Information Technology	50.00	150.00	0.00	200.00
Expenses	6.90	20.78	29.85	57.53
Total SDR Billing	67,963.65	77,725.53	49,260.10	194,949.28
SDR Subcontractors - Legal				
Fuller Law Group				
Attorney	27,912.50	31,130.00	9,762.50	68,805.00
Attorney - Travel	0.00	0.00	0.00	0.00
Expenses	167.00	167.00	167.00	501.00
Total Billing	28,079.50	31,297.00	9,929.50	69,306.00
Greg Pierce-Attorney at Law				
Attorney	21,615.00	24,447.50	10,230.00	56,292.50
Expenses	4.24	12.72	4.24	21.20
Total Billing	21,619.24	24,460.22	10,234.24	56,313.70
Lewis Brisbois Bisgaard & Smith				
Attorney	0.00	0.00	0.00	0.00
Administrative Assistant	0.00	0.00	0.00	0.00
Expenses	0.00	0.00	0.00	0.00
Total Billing	0.00	0.00	0.00	0.00
Inquest Resources				
Partner & Paralegal I	0.00	119.00	8.50	127.50
Partner & Paralegal/Receivership Specialist I	4,301.00	1,776.50	425.00	6,502.50
Partner & Paralegal/Receivership Specialist I - Travel	0.00	0.00	0.00	0.00
Receivership Specialist II	5.50	22.00	33.00	60.50
Expenses	1,991.57	82.38	9.88	2,083.83
Total Billing	6,298.07	1,999.88	476.38	8,774.33
Total Legal Subcontractors	55,996.81	57,757.10	20,640.12	134,394.03
SDR Subcontractors - Other				
Tharp & Associates				
Accountant-Principal/Reinsurance	10,925.00	18,250.00	8,525.00	37,700.00
Accountant-Principal/Reinsurance-Travel	0.00	0.00	0.00	0.00

Corporate Controller/Accountant	663.00	819.00	936.00	2,418.00
IT/Data Base Admin	2,223.00	6,084.00	936.00	9,243.00
Accountant	13,125.00	9,162.50	4,450.00	26,737.50
Expenses	58.49	58.61	59.77	176.87
Total Billing	26,994.49	34,374.11	14,906.77	76,275.37
Petrosewicz & Co., Inc.				
Accountant-Principal	0.00	0.00	0.00	0.00
Accountant	0.00	0.00	0.00	0.00
Expenses	0.00	0.00	0.00	0.00
Total Billing	0.00	0.00	0.00	0.00
EMKAY Associates, Inc				
Claims Manager & Consultant	0.00	0.00	0.00	0.00
Claims Management & IT Consulting	15,015.00	6,247.50	7,003.50	28,266.00
Claims Management & IT Consulting	3,315.00	1,079.50	875.50	5,270.00
Expenses	0.00	0.00	0.00	0.00
Total Billing	18,330.00	7,327.00	7,879.00	33,536.00
Milford Consulting, L.L.C.				
Receivership Specialist I, Claims Consultant	7,351.50	10,491.00	3,588.00	21,430.50
Receivership Specialist II, Data Analysis/Reports, Clair	0.00	0.00	0.00	0.00
Receivership Specialist III	7,579.00	7,098.00	3,523.00	18,200.00
Expenses	0.00	0.00	0.00	0.00
Total Billing	14,930.50	17,589.00	7,111.00	39,630.50
Jennan Enterprises, LLC				
IT Consultant	300.00	150.00	300.00	450.00
Expenses	0.00	0.00	0.00	0.00
Total Billing	300.00	150.00	300.00	450.00
Total Other SDR Subcontractors	60,554.99	59,440.11	30,196.77	149,891.87
Receivership Service Providers				
Magic Couriers, Inc.				
	0.00	0.00	0.00	0.00
Network 1 Consulting-Secure Cloud Storage				
	3,580.60	4,322.60	3,474.60	11,377.80
Smart Data Solutions				
	0.00	0.00	0.00	0.00
Answer National				
	981.45	198.62	137.60	1,317.67
CS Disco, Inc.				
	533.00	533.00	533.00	1,599.00
IMA, Inc. - SDR Bond				
	1,200.00	0.00	0.00	1,200.00
Doxim, Inc.				
	0.00	0.00	41,067.90	41,067.90
Veritext, LLC				
	0.00	4,376.80	0.00	4,376.80
Operating Account Bank Fees-Frost				
	50.00	15.00	15.00	80.00
Texas Treasury				
	1,136.48	1,115.07	1,154.00	3,405.55
US Bank				
	1,017.50	1,000.36	1,038.46	3,056.32
Total Other	8,499.03	11,561.45	47,420.56	67,481.04

Sub-Total SDR, Subcontractor & Provider Expenses

Sub-Total SDR, Subcontractor & Provider Expense	193,014.48	206,484.19	147,517.55	546,716.22
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Liquidation Oversight Allocation

RLO Allocation	17,607.36	19,100.82	19,688.47	56,396.65
Special Master's Fees	685.00	5,320.00	0.00	6,005.00
Total RLO & SM Expense	18,292.36	24,420.82	19,688.47	62,401.65
Total Expenses	211,306.84	230,905.01	167,206.02	609,417.87

**Bright Healthcare Insurance Company of Texas
Statement of Net Assets**

**For the Period Ending
11/30/24**

Line		11/30/24
Cash		
1	Cash	68,082,410
	Cash - Unrestricted	
	APF Funds (Loan proceeds)	
Investments		
2	Short-Term Investments	
3	Bonds	
4	Stocks - Preferred & Common	
5	Investments in Subsidiaries, Controlled or Affiliated Entities	
6	Mortgage Loans	
7	Real Estate	
8	Policy Loans	
9	Other Invested Assets	
Restricted Assets		
10	Statutory Deposits	
11	Funds held by or deposited with Reinsured Companies	
12	Restricted - Other	
Reinsurance Receivable		
13	Reinsurance Recoverables on Paid Losses & LAE (net of allowance)	0
14	Reinsurance Recoverables on Unpaid Losses & LAE (net of allowance)	
15	Reinsurance Recoverables on UEP & Contingent Commissions	
Other Receivables		
16	Salvage & Subrogation Recoveries	
17	Premiums Due from Agents & Policyholders	
18	Receivable from Parents, Subsidiaries & Affiliates	0
19	Receivable from Guaranty Associations - Early Access Payments	
20	Other Receivables	
	RX Rebates Receivable	0
	Other Receivables	0
Other Assets		
21	FF&E	
22	Other Assets	
	Deferred Tax Asset	0
	Total Assets	68,082,411

NOTES

Ref No.

1	<u>Unrestricted Cash</u>	
	TX Operating Account	26,186
	Texas Treasury - Operating	68,023,183
	Frost SDR Operating	33,042
		<u>68,082,410</u>

Bright Healthcare Insurance Company of Texas
Statement of Net Assets

For the Period Ending
11/30/24

13 Reinsurance Recoverable on Paid Losses

Amounts obtained from Bright Healthcare general ledger as of receivership date.

Due from Swiss Re Life & Healthe America-Excess Risk Reinsurance Agreement (Losses)	0
Due from Swiss Re Life & Healthe America-Excess Risk Reinsurance Agreement (Transplant)	80,000
Less: Allowance for Uncollectible	(80,000)
Total Recoverable on Paid Losses	0

18 Affiliate Receivables--due to/from:

Amounts reflected are from Company general ledger as of receivership date

Due from Bright Health Management & Affiliates	805,099,703
Due to Bright Health Management & Affiliates	(803,979,064)
Due from Neuehealth RBE - Provider Risk Share	123,980,505
Total due to/from Affiliates	125,101,144
Less: Allowance for Uncollectible	(125,101,144)
Net Receivable	0

18 Other Receivables

Amounts reflected are from Company general ledger as of receivership date

Prepays and Other Receivables	36,959
Receivable from Providers for Overpayments	10,696,125
Premium Tax Receivable	46,205
Less: Allowance for Uncollectible	(10,779,289)
Net Receivable	0

20 Pharmacy Rebates Receivable

Gross amount due from Pharmacy providers per Company general ledger as of receivership date

Gross amount due from Pharmacy providers per Company general ledger as of receivership date	1,130,380
Less: Allowance for Uncollectible	(1,130,380)
Net Receivable	0

22 Deferred Tax Asset

Amounts reflected are from Company general ledger as of receivership date

Amounts reflected are from Company general ledger as of receivership date	18,889,790
Less: Allowance for Uncollectible	(18,889,790)
Net Receivable	0

Bright Healthcare Insurance Company of Texas
Changes in Net Assets

For the Quarter Ending
11/30/2024

Line		08/31/24	11/30/24	Change
Cash				
1	Cash			
	Cash - Unrestricted	67,232,995	68,082,410	849,415
	APF Funds (Loan proceeds)			0
Investments				
2	Short-Tem Investments			0
3	Bonds			0
4	Stocks - Preferred & Common			0
5	Investments in Subsidiaries, Controlled or Affiliated Entities			0
6	Mortgage Loans			0
7	Real Estate			0
8	Policy Loans			0
9	Other Invested Assets			0
Restricted Assets				
10	Statutory Deposits			0
11	Funds held by or deposited with Reinsured Companies			0
12	Restricted - Other			0
Reinsurance Receivable				
13	Reinsurance Recoverables on Paid Losses & LAE (net of allowance)			0
14	Reinsurance Recoverables on Unpaid Losses & LAE (net of allowance)			0
15	Reinsurance Recoverables on UEP & Contingent Commissions			0
Other Receivables				
16	Salvage & Subrogation Recoveries			0
17	Premiums Due from Agents & Policyholders			0
18	Receivable from Parents, Subsidiaries & Affiliates			0
19	Receivable from Guaranty Associations - Early Access Payments			0
20	Other Receivables			0
	RX Rebates Receivable			0
	Other Receivables			0
Other Assets				
21	FF&E			0
22	Other Assets			0
	Deferred Tax Asset			0
	Valuation Allowance Deferred Tax Asset			0
	Total Assets	67,232,995	68,082,410	849,415

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**Bright Healthcare Insurance Company of Texas
Statement of Net Liabilities**

**For Period Ending
11/30/24**

Line		11/30/24
1	Secured Claims	
2	APF Loan	
3	Special Deposit Claims	
Administrative Claims - Class 1		
4	Administrative Claims - State/Receiver	
	Special Deputy Receiver, Subcontractors Fees & Expenses	147,517.55
	Liquidation Oversight	19,688.47
	Special Master's Fees	-
5	Administrative Claims - Guaranty Assns	
	Administrative Expense Paid	4,867,500
	Administrative Expense Reserves	
6	LAE - Guaranty Assns	
	LAE Paid	
	LAE Reserves	
Policy Claims - Class 2		
7	Loss Claims - Guaranty Assns	
	Loss Claims Paid	4,500,474
	Loss Claims Reserves	
8	Loss Claims - Other	
	Other Loss Claims Paid	
	Other Loss Claims Reserves	
9	LAE - Other	
10	Unearned & Advance Premium Claims - GA	
11	Unearned & Advance Premium Claims - Other	840,591
Other Liabilities		
12	Class 3 Claims	91,203,223
13	Class 4 Claims	
14	Class 5 General Unsecured Creditor Claims	371,811
15	Class 5 Reinsurance Related Unsecured Claims	
16	Class 6 Claims	
17	Class 7 Claims	
18	Class 8 Claims	
19	Class 9 Claims	
20	Class 10 Interest	
21	Class 11 Claims	
22	Other Liabilities	
	Total Liabilities	101,950,805
23	Total Equity/(Deficit) Excess (Deficiency) of Assets over Liabilities	(33,868,394)
	Total Liabilities & Equity	68,082,411

**Bright Healthcare Insurance Company of Texas
Statement of Net Liabilities**

**For Period Ending
11/30/24**

NOTES

Ref. No.

5 Reflects amounts reported to the SDR by the Texas Life Health Insurance Guaranty Association (TXLHIGA) through August 31, 2024. The appropriateness and reasonableness of the amounts will be reviewed by the SDR in future months.

7 Reflects amounts reported to the SDR by the Texas Life Health Insurance Guaranty Association (TXLHIGA) through October 31, 2024. Total number claims paid through October 31, 2024 are 11,066. The appropriateness and reasonableness of the amounts will be reviewed by the SDR in future months.

11 Reflects amount obtained from Company general ledger as of receivership date and ultimately reconciled post receivership.

12 Represents amounts reported by the Company relative to Centers for Medicare & Medicaid Services (CMS) pursuant to a Repayment Plan Approval and Letter of Agreement. This amount has not been reviewed or adjudicated but will most likely be classified as a Class 3 claim in the future.

CMS Risk Adjustment Payable	89,637,573
CMS Risk Adjustment Payable - Interest	429,513
CMS APTC Payable	1,136,137
	<u>91,203,223</u>

14 Represents amounts obtained from the Company's general ledger of pre-receivership outstanding vendor invoices. These amounts have not been reviewed or adjudicated and would most likely be classified as a Class 5 claim once the POC process has been completed. This excludes receipts deposited post receivership which will be reconciled and reported in future months under the appropriate line item.

General Accruals	169,025
Broker Commission Payable	11,788
Suspense Account - Cash Clearing	190,999
	<u>371,811</u>

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Bright Healthcare Insurance Company of Texas
Changes in Net Liabilities

For the Quarter Ending
11/30/2024

Line		08/31/24	11/30/24	Change
1	Secured Claims			0
2	APF Loan			0
3	Special Deposit Claims			0
Administrative Claims - Class 1				
4	Administrative Claims - State/Receiver			0
	Special Deputy Receiver, Subcontractors Fees & Expenses	242,967	147,518	(95,449)
	Liquidation Oversight	13,647	19,688	6,041
	Special Master's Fees	1,673	0	(1,673)
5	Administrative Claims - Guaranty Assns			0
	Administrative Expense Paid	4,867,499	4,867,500	1
	Administrative Expense Reserves			0
6	LAE - Guaranty Assns			0
	LAE Paid			0
	LAE Reserves			0
Policy Claims - Class 2				
7	Loss Claims - Guaranty Assns			0
	Loss Claims Paid	3,611,150	4,500,474	889,324
	Loss Claims Reserves	358,296	0	(358,296)
8	Loss Claims - Other			0
	Other Loss Claims Paid			0
	Other Loss Claims Reserves			0
9	LAE - Other			0
10	Unearned & Advance Premium Claims - GA			0
11	Unearned & Advance Premium Claims - Other	840,591	840,591	0
Other Liabilities				
12	Class 3 Claims	91,203,223	91,203,223	(0)
13	Class 4 Claims			0
14	Class 5 General Unsecured Creditor Claims	300,021	371,811	71,790
15	Class 5 Reinsurance Related Unsecured Claims			0
16	Class 6 Claims			0
17	Class 7 Claims			0
18	Class 8 Claims			0
19	Class 9 Claims			0
20	Class 10 Interest			0
21	Class 11 Claims			0
22	Other Liabilities			0
	Total Liabilities	101,439,067	101,950,805	511,738
23	Total Equity/(Deficit) Excess (Deficiency) of Assets over Liabilities	(34,206,072)	(33,868,394)	337,678
	Total Liabilities & Equity	67,232,995	68,082,411	849,416

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**Bright Healthcare Insurance Company of Texas
Sources & Uses of Cash**

**For Period Ending
11/30/24**

	Qtr Ending Nov-2024
Income	
Premium Receipts	0
Agents' Balances Received	0
Reinsurance Recoveries	0
Salvage & Subrogation Recoveries	0
Affiliates Recovery	0
Settlement/Litigation Recovery	0
Other Receipts	651,005
Sale of Real & Personal Property	0
Investment Sales/Receipts	0
Other Asset Receipts	0
Total Receipts from Assets/Receivables	651,005
Interest & Dividend Receipts, EA Interest	823,169
Cash Deposit Interest	0
Total Cash Receipts	1,474,174
Disbursements	
SDR Fees & Expenses	205,851
Subcontractor Legal Fees & Expenses	153,827
Subcontractor Other Fees & Expenses	179,923
Non-Subcontractor Fees & Expenses	19,382
Other Expenses	7,742
RLO Fees & Expenses	58,034
Total Disbursements for Operations	624,758
Loss Claims & LAE Expense Payments	0
Early Access Payments - GA	0
Refunds & Other Distributions	0
Total Cash Distributions	0
Total Cash Disbursements & Distributions	624,758
Net Increase(Decrease) in Cash	849,416
Cash at Beginning of Period	67,232,995
Cash at End of Period	68,082,410

Automated Certificate of eService

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Greg Pierce on behalf of Greg Pierce

Bar No. 15994250

gpierce@gpiercelaw.com

Envelope ID: 95360240

Filing Code Description: No Fee Documents

Filing Description: SPECIAL DEPUTY RECEIVER'S QUARTERLY FINANCIAL REPORT AND SUMMARY STATEMENT OF

EXPENSES(SEPTEMBER 1, 2024 THROUGH NOVEMBER 30, 2024)

Status as of 12/16/2024 2:34 PM CST

Case Contacts

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Associated Case Party: Texas Life & Health Insurance Guaranty Association

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Greg Pierce on behalf of Greg Pierce

Bar No. 15994250

gpierce@gpiercelaw.com

Envelope ID: 95360240

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EXPENSES(SEPTEMBER 1, 2024 THROUGH NOVEMBER 30, 2024)

Status as of 12/16/2024 2:34 PM CST

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