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19TH JUDICIAL DISTRICT COURT
PARISH OF EAST BATON ROUGE
STATE OF LOUISIANA

SUIT NO. 499,737 DIVISION "D"

J. ROBERT WOOLEY, AS
ACTING COMMISSIONER OF INSURANCE
FOR THE STATE OF LOUISIANA
VERSUS
AMCARE HEALTH PLANS OF LOUISIANA, INC.

COST OK Amt. 8
114462
SEP 27 2002
BY DY. CLERK OF COURT

FILED: _____ _____
DEPUTY CLERK

CONSENT TO EMERGENCY MOTION TO CANCEL ALL CERTIFICATES OF COVERAGE, SUBSCRIBER AGREEMENTS, MEMBER AGREEMENTS AND/OR POLICIES AND PERMITTING THE TRANSFER OF AMCARE BUSINESS

AmCare Health Plans of Louisiana, Inc. hereby consents to Petitioner's Motion to Cancel all Certificates of Coverage, Subscriber Agreements, Member Agreements and/or Policies and Permitting the Transfer of AmCare Business for the reasons set forth in the Answer and Consent to Petition for Rehabilitation, Preliminary Injunction and Rule to Show Cause previously filed in the above-styled matter.

Respectfully yours,

Patrick D. Seiter (Bar No. 22,153)
J. Wendell Clark (Bar No. 4150)
ADAMS AND REESE LLP
451 Florida Street, 19th Floor
Bank One Centre, North Tower
Baton Rouge, Louisiana 70801
Telephone (225) 336-5200
Facsimile (225) 336-5220

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading has been sent to the following counsel of record by placing a copy of same, properly addressed and postage prepaid, in the United States mail and by facsimile on this 27th day of September 2002.

Sue Buser
Martinez & Buser, LLC
1518 Highway 30 East
Gonzales, LA 70737
Facsimile (225) 644-6111

Patrick D. Seiter

Patrick D. Seiter

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NINETEENTH JUDICIAL DISTRICT COURT
PARISH OF EAST BATON ROUGE
STATE OF LOUISIANA

NUMBER: 499-737 DIVISION: D

J. ROBERT WOOLEY, AS
ACTING COMMISSIONER OF INSURANCE
FOR THE STATE OF LOUISIANA
VERSUS
AMCARE HEALTH PLANS OF LOUISIANA, INC.

COST OK Amt. ✓

FILED: _____ SEP 27 2002

DEPUTY CLERK BY _____ DY. CLERK OF COURT

CERTIFICATION OF SERVICE

I hereby certify that a copy of the Petition for Rehabilitation and Injunctive Relief and Rule to Show Cause setting a hearing on the matter for Friday, September 27, 2002 at 10:00 a.m. and a copy of the Emergency Motion to Cancel All Certificates of Coverage, Subscriber Agreements, Member Agreements and/or Policies and Permitting the Transfer of AmCare Business and a copy of the order setting same for hearing in this matter for Friday, September 27, 2002 at 10:00 a.m. was served on AmCare Health Plans of Louisiana, Inc. by personally delivering a copy of same to AmCare Health Plans of Louisiana, Inc. through Scott H. Westbrook at the office of AmCare Health Plans of Louisiana, Inc., 5353 Essen Lane, Suite 450, Baton Rouge, LA 70809 and by faxing and mailing a copy of same to AmCare Health Plans of Louisiana, Inc. through Patrick D. Seiter, attorney for AmCare Health Plans of Louisiana, Inc. at (225) 336-5220, and at Adams & Reese, 451 Florida Street, North Tower, 19th Floor, Baton Rouge, LA 70801 on September 24, 2002.

Respectfully Submitted,

Attorneys for J. ROBERT WOOLEY
Acting Commissioner of Insurance for the State of Louisiana

Martinez & Buser, LLC

BY: _____

Sue Buser #18151
Richard W. Martinez #17040
1518 Highway 30 East
Gonzales, LA 70737
Telephone: (225) 644-6100

CERTIFIED TRUE COPY
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DEPUTY CLERK OF COURT
19TH JUDICIAL DISTRICT
EAST BATON ROUGE PARISH, LA
2002 SEP 27 AM 9:50

REHABILITATION PLAN FOR THE AmCare HEALTH PLANS OF LOUISIANA, INC.
SUBMITTED BY
THE COMMISSIONER OF INSURANCE FOR THE STATE OF LOUISIANA

The Commissioner of Insurance for the State of Louisiana as Rehabilitator of AmCare Health Plans of Louisiana, Inc. through the Court-appointed Receiver (the "Receiver") proposes to implement this Rehabilitation Plan ("the Rehabilitation Plan") for AmCare Health Plans of Louisiana, Inc. ("AmCare"), as follows:

1) With respect to the commercial group business of AmCare (those certificates of coverage and other products sold by AmCare to business entities and other multiple person groups), the Receiver shall be authorized to accept an offer from United Healthcare, Inc. ("United Healthcare") to AmCare, which offer will replace all the commercial group coverage of AmCare in effect prior to September 30, 2002 on a guarantee issue basis (United Healthcare will agree to issue health care coverage to all existing commercial groups receiving health care coverage with AmCare without exception).

2) The Receiver shall be authorized to discontinue and cancel all certificates of coverage, subscriber agreements, member agreements and/or policies of insurance of AmCare effective at 12:00 p.m. midnight on September 30, 2002.

3) The Receiver shall be authorized to issue written notice of no less than ten (10) days to all commercial group and individual policyholders that their coverage with AmCare is being discontinued and cancelled effective at 12.00 p.m. midnight on September 30, 2002. The discontinuance and cancellation notice shall be deemed to meet the requirements of La. R.S. 22:250.13 C for the purpose of assuring individual eligibility rights to replacement coverage under La. R.S. 22:250.12(H) through October 15, 2002.

4) All notices required to be provided as to the discontinuance and cancellation of coverages shall be provided by regular United States mail with a certificate of mailing (proof of mailing) provided by the United States Post Office, which notices shall be considered issued on the date of such mailing. The addresses for the notices shall be the last address for each subscriber, member or enrollee as recorded in the books and records, including computer records, of AmCare. The Receiver will retain unopened notices that are returned as undeliverable or not accepted for verification as necessary..

5) All policies, certificates of coverage, plans and other products of AmCare pursuant to which AmCare is required to provide coverage to enrollees and subscribers shall be terminated effective September 30, 2002.

6) For the period from the date of the entry of the order approving this Plan of Rehabilitation through November 30, 2002, all business and operations of AmCare shall be conducted as the Receiver may deem necessary or advisable.

7) No new business and/or renewal business will be written or undertaken by AmCare however, certificates of coverages in force through September 30, 2002 will be adjusted by life style changes, i.e. birth of a baby, marriage, etc.