

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.

**STATE**  
COST OK TO AME  
**FILED**  
MAR 16 2004

FILED: \_\_\_\_\_

BY \_\_\_\_\_  
BY CLERK OF COURT

DEPUTY CLERK

**MOTION FOR FURTHER ORDER OF THE COURT AND  
FOR RELEASE OF FUNDS REALIZED FROM SALE OF AMCARE  
FURNITURE, FIXTURES AND EQUIPMENT**

NOW INTO COURT through undersigned counsel comes Marlon V. Harrison, the Receiver for AmCare Health Plans of Louisiana, Inc. in Receivership (the "Receiver"), who represents:

1.

AmCare Health Plans of Louisiana, Inc. in Receivership ("AmCare") was placed in liquidation by order of this honorable Court on November 12, 2002 (the "Liquidation Order").

2.

A motion for approval to sell certain furniture, fixtures and equipment of AmCare was granted by this Court on January 20, 2004.

3.

The prior order of this honorable Court required the deposit of the proceeds of the approved sale of the furniture, fixtures and equipment to be deposited in the registry of the Court. A copy of that motion and order is attached hereto and incorporated herein as Exhibit A.

4.

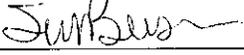
The Receiver desires and is entitled to a further order of this Court requiring that the funds realized from the sale be released to the Receiver for deposit into the liquidation account of AmCare for use in the pending liquidation proceeding.

WHEREFORE, the Receiver prays that this honorable Court issue a further order requiring that all funds realized from the sale of the AmCare furniture, fixtures and equipment be released to the Receiver, and authorizing the Receiver to deposit said funds into the liquidation account of AmCare for use in the pending liquidation proceeding, and for all other appropriate relief.

RESPECTFULLY SUBMITTED,

BY ATTORNEYS FOR  
J. Robert Wooley  
Commissioner of Insurance  
for the State of Louisiana

Buser & Associates, APLC

BY: 

Sue Buser #18151  
1518 Highway 30 East  
Gonzales, LA 70737  
Telephone: (225) 644-6100  
Fax: (225) 644-6111

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NINETEENTH JUDICIAL DISTRICT COURT

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VERSUS

AMCARE HEALTH PLANS OF LOUISIANA, INC.

FILED: \_\_\_\_\_  
DEPUTY CLERK

**MEMORANDUM IN SUPPORT OF MOTION FOR FURTHER ORDER OF  
THE COURT AND FOR RELEASE OF FUNDS REALIZED FROM  
SALE OF AMCARE FURNITURE, FIXTURES AND EQUIPMENT**

MAY IT PLEASE THE COURT:

On November 12, 2002, AmCare Health Plans of Louisiana, Inc. ("AmCare") was placed in liquidation. This Court previously authorized the sale of certain furniture, fixture and equipment of AmCare, by order of this honorable Court dated January 20, 2004. Said order required the Receiver to place the funds realized from the sale of the AmCare furniture, fixtures and equipment into the registry of the Court. A copy of that order is attached hereto and incorporated herein and marked Exhibit A.

The Receiver desires and is entitled to a further order of this Court requiring that the funds realized from the sale of the AmCare furniture, fixtures and equipment be released to the Receiver for deposit into the liquidation account of AmCare for use in the pending liquidation proceeding.

RESPECTFULLY SUBMITTED,

BY ATTORNEYS FOR  
J. Robert Wooley  
Commissioner of Insurance  
for the State of Louisiana

Buser & Associates, APLC

BY: Sue Buser  
Sue Buser #18151  
1518 Highway 30 East  
Gonzales, LA 70737  
Telephone: (225) 644-6100  
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DEPUTY CLERK

NINETEENTH JUDICIAL DISTRICT COURT  
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FOR THE STATE OF LOUISIANA  
VERSUS  
AMCARE HEALTH PLANS OF LOUISIANA, INC.

FILED: \_\_\_\_\_

DEPUTY CLERK

ORDER

Considering the motion for further order of the Court and for release of funds realized from sale of AmCare furniture, fixtures and equipment, and the Court considering the pleadings filed, and the Court finding that the parties are entitled to the relief granted,

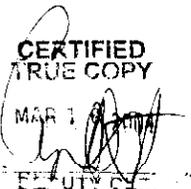
IT IS ORDERED, ADJUDGED AND DECREED that the motion for further order of the Court and for release of funds realized from sale of AmCare furniture, fixtures and equipment be and hereby is granted.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the Receiver be and hereby is authorized to deposit the funds realized from the sale of AmCare furniture, fixtures and equipment into the liquidation account of AmCare for use in the pending liquidation proceeding.

Baton Rouge, Louisiana, this 16 day of March 2004.

  
JUDGE

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NINGTEENTH JUDICIAL DISTRICT COURT  
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FOR THE STATE OF LOUISIANA

VERSUS

AMCARE HEALTH PLANS OF LOUISIANA, INC., INC.

---

## MOTION FOR APPROVAL TO SELL

NOW INTO COURT, through the undersigned counsel comes AMCARE HEALTH PLANS OF LOUISIANA, INC. (hereinafter "AMCARE") appearing herein through Marlon Harrison, court-appointed Receiver of this estate by order of this court who respectfully represents that:

1.

AMCARE was placed in liquidation by this Court on October 21, 2002.

2.

AMCARE is the owner of various furniture, fixtures and equipment that need to be sold in order to liquidate the estate. This furniture, fixtures and equipment is being kept at the Louisiana Department of Insurance, Office of Receivership in Baton Rouge, Louisiana.

3.

A recent inventory of such items was done and the results of that inventory are attached as Exhibit "A."

4.

The Receiver avers that AMCARE has no need to retain this furniture, fixtures and equipment and that it is in the best interest of the estate to sell this property.

5.

The Receiver, therefore, requests that he be authorized to sell the furniture, fixtures and equipment listed on Exhibit "A" by the most cost effective means determined by the Receiver.

NINETEENTH JUDICIAL DISTRICT COURT  
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FOR THE STATE OF LOUISIANA

VERSUS

AMCARE HEALTH PLANS OF LOUISIANA, INC., INC.

---

MEMORANDUM IN SUPPORT OF  
MOTION FOR APPROVAL TO SELL

**MAY IT PLEASE THE COURT:**

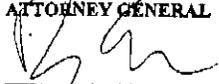
AMCARE was placed in liquidation by Order of this Honorable Court on October 21, 2002. AMCARE is the owner of furniture, fixtures and equipment that need to be sold in order to liquidate the estate.

A recent inventory of such items was done and the results of that inventory are attached as Exhibit "A." Further, the Receiver avers that AMCARE has no need to retain this furniture, fixtures and equipment and that it is in the best interest of the estate to sell this furniture. The Receiver, therefore, requests that he be authorized to sell the furniture, fixtures and equipment listed on Exhibit "A" by the most cost effective means determined by the Receiver.

WHEREFORE, the Receiver prays that this Court issue an order authorizing him to sell the furniture, fixtures and equipment listed on Exhibit "A" by the most cost effective means determined by the Receiver.

RESPECTFULLY SUBMITTED,  
CHARLES C. FOTI, JR.  
ATTORNEY GENERAL

By:

  
\_\_\_\_\_  
Dominique Jones Sam, #27872  
Arlene D. Knighten, #7754  
Jackie N. Harris, Jr., #26043  
Assistant Attorneys General  
301 Main Street, Suite 1250A  
Baton Rouge, LA 70801  
(225) 326-6452

NINETEENTH JUDICIAL DISTRICT COURT  
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AMCARE HEALTH PLANS OF LOUISIANA, INC., INC.

AFFIDAVIT

BEFORE ME, the undersigned authority, personally came and appeared

MARLON HARRISON

who after by me being duly sworn did depose and state:

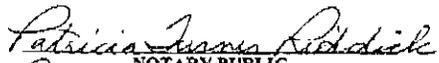
That he is the court appointed Receiver for AMCARE HEALTH PLANS OF LOUISIANA, INC., (hereinafter "AMCARE").

That he has read the Motion, Order and Memorandum for Approval to Sell attached hereto and avers that the allegations contained therein are true and correct to the best of his information, knowledge and belief.

That he agrees that it is in the best interest of the estate to sell the furniture, fixtures and equipment sought to be sold by the aforementioned Motion, Order and Memorandum.

  
MARLON HARRISON

SWORN TO AND SUBSCRIBED before me, Notary Public this 28<sup>th</sup> day of January, 2004 at Baton Rouge, Louisiana.

  
NOTARY PUBLIC  
Patricia Turner Riddick

AmCare FF&E Asset Sale List	
LRO #	Description of Item
7814	Framed Plantation Picture by: Al, Frederico, 93
7815	Framed Plantation Picture by: Al, Frederico, 94
7817	Framed Magnolia Picture by: Catherine Satchfield Sinopoli 642/900
7816	Framed trolley/plantation picture by: Al Frederico, 94
7818	Three shelf Cherry Wood finish book case
7821	Five drawer Cherry Wood finish Exec. Desk
7822	Five drawer Cherry Wood finish Exec. Desk
7823	Four drawer Cherry wd credenza w/cabinets
7811	Four drawer gray file cabinet
7812	Four drawer gray file cabinet
7813	Four drawer gray file cabinet
7819	Blue cloth task chair - Hon Company - Model 4001AB - Serial MP1IX
7820	Blue cloth task chair - Hon Company - Model 4001AB - Serial MP1IX
7835	H.P. OfficeJet color model 610 fax machine
7824	Quartal 3' x 2" Four Month Planner - No. 6531G (New)
7825	3' x 2' Wall Eraser Board
7826	3' x 2' Cork Wall Board
7827	4' x 8' Wall Eraser Board
7828	4' x 3' Wall Eraser Board
7829	AmCare Exposition Display Unit
7830	AmCare Exposition Display Unit
7831	Catalogue Rack - Grey
7832	Catalogue Rack - Grey
7833	Catalogue Rack - Grey
7834	Catalogue Rack - Grey



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ORDER

Considering the above and foregoing:

IT IS ORDERED that the Receiver prays he be authorized to sell the furniture, fixtures and equipment listed on Exhibit "A" by the most cost effective means determined by the Receiver, *And net proceeds deposited in Registry of the Court*  
Baton Rouge, Louisiana this 2<sup>nd</sup> day of Jan, 2004.

*Joni Clark*

NINETEENTH JUDICIAL DISTRICT COURT

CLERK  
FEB 2 2004

CERTIFIED  
TRUE COPY

FEB 2 2004  
BY *[Signature]*  
DEPUTY CLERK