

MEMORANDUM IN SUPPORT

This Motion is brought by the Liquidator requesting that this Court approve the Statement of Receipts and Disbursements of the Liquidator for the period January 1, 2008 through June 30, 2008. These receipts and expenditures are described and set forth in the attached Exhibit A.

By Order of this Court entered on November 6, 2002, the Ohio Superintendent of Insurance was appointed Liquidator of Renaissance Health Plan, Inc., ("RHP") and was empowered, authorized and directed to liquidate all of the property and assets of RHP in accordance with the laws of Ohio and under the continuing jurisdiction of this Court. As part of the liquidation, the Liquidator collects all debts and moneys due RHP, and makes payment of necessary expenses. R.C. 3903.21(A)(4) provides, in pertinent part, that the Liquidator may:

Pay reasonable compensation to persons appointed and defray from the funds or assets of the insurer all expenses of taking possession of, conserving, conducting, liquidating, disposing of or otherwise dealing with the business and property of the insurer.

Section 3903.42(A) of the Ohio Revised Code provides that the expenses of administration be given first priority in the distribution of assets.

The Liquidator is also required by R.C. 3903.18(E) to periodically account to the Court, throughout the pendency of the RHP liquidation proceeding, to be submitted in the form attached hereto as Exhibit A. Such accountings may assist the Court in monitoring the progress and status of the liquidation, and in particular, the receipts and disbursements in the RHP liquidation proceedings.

WHEREFORE, for the reasons outlined above, the Liquidator respectfully requests the Court to approve the attached Statement of Receipts and Disbursements of the Liquidator for the period January 1, 2008 through June 30, 2008.

Respectfully submitted,

NANCY H. ROGERS
Attorney General State of Ohio

By Outside Counsel:
KEGLER, BROWN, HILL & RITTER
A Legal Professional Association



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Plan, Inc.

EXHIBIT A

RENAISSANCE HEALTH PLAN, INC., IN LIQUIDATION
LIQUIDATION DATE NOVEMBER 6, 2002
STATEMENT OF CASH RECEIPTS AND DISBURSEMENTS
CUMULATIVE FROM NOVEMBER 6, 2002 THROUGH JUNE 30, 2008

	Current Period 1/1/2008 TO 6/30/2008	Year to Date 1/1/2008 TO 6/30/2008	CUMULATIVE FROM 11/06/02
Beginning Cash & Invested Assets (Note 1)	2,419,986.33	2,419,986.33	3,042,454.53
Receipts:			
Interest Income (Note 2)	29,841.42	29,841.42	444,303.77
Reimbursement of Paid Claims	0.00	0.00	96,033.08
Premiums Collected	0.00	0.00	141,560.57
Reinsurance Recoveries	0.00	0.00	33,278.08
Unearned Commissions Collected	0.00	0.00	372.75
Proceeds from Sale of Furniture & Equipment	0.00	0.00	19,596.99
Proceeds from Class Action Lawsuit (Note 3)	1,512.74	1,512.74	32,369.54
Recovery of Preference Payments	0.00	0.00	2,000,000.00
Capitation Refunds	0.00	0.00	3,676.19
Proceeds from Cleveland Voided Payroll Checks	0.00	0.00	6,914.38
Proceeds from Settlement with Directors and Officers (Note 4)	4,500,000.00	4,500,000.00	4,500,000.00
Reimbursements of Cobra Premium Payments	0.00	0.00	5,402.88
Salvage & Subrogation	0.00	0.00	55,329.53
Postage Refund	0.00	0.00	7,009.91
Tax Refunds	0.00	0.00	2,542.76
Recovery of Rx America Receivable - Akron City Health Systems	0.00	0.00	64,243.32
ACLIC Settlement Deposited in Error	0.00	0.00	15,259.28
Insurance Recovery - Theft of Computer \ Equipment	0.00	0.00	385.91
Other Income	0.00	0.00	33,933.71
Total Receipts	4,531,354.16	4,531,354.16	7,462,212.65
Disbursements:			
Compensation:			
Salaries (Note 5)	38,650.46	38,650.46	1,130,524.45
Employee Benefits (Note 6)	3,836.59	3,836.59	85,611.67
Payroll and Other Taxes (Note 7)	3,011.28	3,011.28	84,018.84
Professional Fees:			
Legal Fees (Note 8)	8,893.19	8,893.19	1,085,554.68
Consulting Fees and Other Outside Contracts (Note 9)	1,015.96	1,015.96	569,775.43
Tax Preparation and Audit Fees (Note 10)	879.56	879.56	35,270.09
Other Expenses of Administration of Company and its Property:			
Rent and Rent Items (Note 11)	13,948.42	13,948.42	227,280.74
Equipment Expenses (Note 12)	108.36	108.36	44,819.68
Travel and Travel Items (Note 13)	532.82	532.82	114,699.06
Postage, Freight and Telephone (Note 14)	759.59	759.59	75,478.28
Office Supply Expense (Note 15)	187.06	187.06	11,413.14
Data Processing (Note 16)	18,132.24	18,132.24	381,600.97
Moving and Relocation Costs (Note 17)	2,198.97	2,198.97	2,198.97
Other Expenses (Note 18)	1,049.56	1,049.56	150,808.89
All Other Disbursements:			
Return Overpayment of Premium	0.00	0.00	10,971.23
Payment to ACLIC for Deposit made in Error	0.00	0.00	15,259.28
Total Disbursements	93,204.06	93,204.06	4,025,285.40
Recovery of Statutory Deposit (Certificate of Deposit) OH	0.00	0.00	378,754.65
Ending Cash & Invested Assets (Note 1)	6,858,136.43	6,858,136.43	6,858,136.43

See Schedule A for Analysis of Increase in Cash and Invested Assets (Unencumbered)

**RENAISSANCE HEALTH PLAN, INC., IN LIQUIDATION
LIQUIDATION DATE NOVEMBER 6, 2002
STATEMENT OF CASH RECEIPTS AND DISBURSEMENTS
FOR THE PERIOD JANUARY 1, 2008 THROUGH JUNE 30, 2008**

SCHEDULE A

Beginning Cash (Unencumbered) and Non Cash (Encumbered) Assets as of 12/31/07	2,419,986.33
Increase in Cash and Invested Assets (Unencumbered)	<u>4,438,150.10</u>
Actual Increase in Cash and Invested Assets (Unencumbered)	4,438,150.10
Non Cash Assets (Encumbered) Amoritzation of Premium/Discount	<u>0.00</u>
Ending Cash (Unencumbered) and Non Cash (Encumbered) Assets as of 06/30/08	<u><u>6,858,136.43</u></u>

RENAISSANCE HEALTH PLAN, INC., IN LIQUIDATION
LIQUIDATION DATE NOVEMBER 6, 2002
NOTES TO STATEMENT OF CASH RECEIPTS AND DISBURSEMENTS
FOR THE PERIOD JANUARY 1, 2008 THROUGH JUNE 30, 2008

	Beginning Balance 12/31/07	Ending Balance 06/30/08
Note 1		
<u>Cash and Invested Assets</u>		
Unencumbered Cash & Invested Assets		
Cash	5,986.33	50,136.43
Repurchase Agreements	2,414,000.00	6,808,000.00
Bonds / T-Bill at Amortized Value	0.00	0.00
Total Unencumbered Cash & Invested Assets	2,419,986.33	6,858,136.43
Encumbered Non Cash Assets		
	0.00	0.00
Total Encumbered Non Cash Assets	0.00	0.00
Total Cash and Invested Assets and Non Cash Assets	2,419,986.33	6,858,136.43
Note 2		
<u>Interest Income</u>		
Interest on Repos	29,841.42	
Total Interest Income	29,841.42	
Note 3		
<u>Proceeds from Class Action Lawsuit</u>		
Settlement - RX America	1,512.74	
Total Proceeds from Class Action Lawsuit	1,512.74	
Note 4		
<u>Proceeds from Settlement with Directors and Officers</u>		
Settlement - Executive Risk Indemnity Inc	4,500,000.00	
Total Proceeds from Settlement with Directors and Officers	4,500,000.00	
Note 5		
<u>Salaries</u>		
Chief Deputy Liquidator	1,358.87	
Deputy Liquidators	5,778.64	
Employee Salaries	31,512.95	
Total Salary Expense	38,650.46	
Note 6		
<u>Employee Benefits</u>		
Salaries 401K Employer Contribution	542.55	
Employee Insurance Benefits	3,273.42	
Employee Relations Other	20.62	
Total Employee Benefits Expense	3,836.59	

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Note 7	<u>Payroll and Other Taxes</u>	
	Workers' Compensation Insurance	117.46
	State Unemployment Tax	134.13
	Federal Unemployment Tax	70.78
	FICA Tax	2,688.91
	Total Payroll and Other Tax Expense	<u><u>3,011.28</u></u>
Note 8	<u>Legal Fees</u>	
	<u>Special Counsel</u>	
	Kegler, Brown, Hill & Ritter	8,700.00
		<u>8,700.00</u>
	<u>Legal Counsel</u>	
	Kegler, Brown, Hill & Ritter	79.06
		<u>8,779.06</u>
	<u>Legal Expenses</u>	
	Kegler, Brown, Hill & Ritter	114.13
		<u>114.13</u>
	Total Legal Fees & Expenses	<u><u>8,893.19</u></u>
Note 9	<u>Consulting Fees and Other Outside Contracts</u>	
	1099 Connection - Governmental Reporting	3.26
	ADP- Payroll Processing Fees	89.98
	Digital Controls - IT Consultant	191.96
	Kim Burnside - POC Admin. Consultant	159.45
	KB Resolutions	9.33
	Teksystems - IT Consultant	561.98
	Total Consulting Fees and Other Outside Contracts	<u><u>1,015.96</u></u>
Note 10	<u>Tax Preparation and Audit Fees</u>	
	Schneider Downs & Co. - Audit Fees - 2007	250.00
	Private Letter Ruling Preparation and IRS Application	629.56
	Total Tax Preparation and Audit Fees	<u><u>879.56</u></u>
Note 11	<u>Rent and Rent Items</u>	
	Rent on Leased Properties	8,831.98
	Furniture, Fixtures, & Equipment Rent	698.44
	Utilities-Gas/Electric	3,070.46
	Janitorial Service	1,347.54
	Total Rent and Rent Items	<u><u>13,948.42</u></u>

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Note 12	<u>Equipment Expense</u>	
	Furniture, Fixtures, & Equipment (Various)	108.36
	Total Equipment Expense	<u>108.36</u>
Note 13	<u>Travel and Travel Items</u>	
	Travel/Accommodation-Transportation - Liquidation Office Employees	477.61
	Travel Expenses and Meals - Liquidation Office Employees	55.21
	Total Travel and Travel Items	<u>532.82</u>
Note 14	<u>Postage, Freight, Telephone, and Internet</u>	
	Postage	519.39
	Express and Freight	20.91
	Telephone & Fax	173.83
	Internet	45.46
	Total Postage, Freight, Telephone, and Internet	<u>759.59</u>
Note 15	<u>Office Supply Expense</u>	
	Office Supplies	187.06
	Total Office Supply Expense	<u>187.06</u>
Note 16	<u>Data Processing</u>	
	Computer Maintenance	425.36
	Computer Supplies	82.80
	Computer Software Lease- Other	10.33
	Computer Software Lease- DST Health Solutions, Inc. (fka - CSC Healthcare, Inc.)	17,613.75
	Total Data Processing Expense	<u>18,132.24</u>
Note 17	<u>Moving and Relocation Costs</u>	
	Advanced Technology Integrators-IT Relocation of Phone System	98.01
	Columbus Downtown Development Corp. - Turner Green Bldgs.	103.73
	Commercial Works, Inc. - Move Planning / Expenses	1,898.60
	Critical Power Services, Inc. - IT Relocation of Backup System	44.59
	FFE Non Capital Items	6.55
	Liquidation Office - Misc. Exp.	0.78
	Liquidation Office Travel Expense	7.46
	Microman, Inc. - IT Network Labor	4.62
	Republic Waste Services - Trash \ Dumpster	30.19
	Scioto Businss Forms-Pre-printed envelopes	4.44
	Total Moving and Relocation Costs	<u>2,198.97</u>
Note 18	<u>Other Expenses</u>	
	Training & Seminars	63.54
	Insurance Building Liability	253.53
	Advertisements/Publications	9.09
	Employment Fees	24.64
	Registration & Dues	52.43
	Moving Expense	318.09
	FF&E Non Capital	(0.25)
	Books & Periodicals	60.31
	Contract Printing	11.03
	Temporary Help	253.30
	Misc Expense	3.85
	Total Other Expenses	<u>1,049.56</u>