IN THE CIRCUIT COURT OF THE SECOND JUDICIAL CIRCUIT, IN AND FOR LEON COUNTY, FLORIDA

In re: THE RECEIVERSHIP of UNIVERSAL HEALTH CARE INSURANCE COMPANY, INC., a Florida corporation,

CASE NO.: 2013-CA 00358

IN RE: The Receivership of UNIVERSAL HEALTH CARE, INC, a Florida corporation

CASE NO.: 2013-CA 00375

_____/

DEPARTMENT'S MOTION FOR COURT TO SET CLAIMS BAR DATE

The Florida Department of Financial Services, as Receiver for UNIVERSAL HEALTH CARE INSURANCE COMPANY, INC. ("UHCIC") and UNIVERSAL HEALTH CARE, INC. ("UHC") (collectively "the Department'), files this Motion for Court to Set Claims Bar Date, and states as follows:

1. Universal Health Care, Inc. was a health maintenance organization, and UHCIC was a health insurance company. Both companies were based in St. Petersburg, Florida.

2. The Department was appointed as Receiver for UHC and UHCIC effective April 1, 2013. These companies have been in liquidation for almost 6 years. The deadline for claimants to file a Proof of Claim was June 30, 2014.

3. Pursuant to section 631.021(1), Florida Statutes, this Court has jurisdiction over the UHC and UHCIC receiverships and is authorized to enter all necessary and/or proper orders to carry out the purpose of the Florida Insurers Rehabilitation and Liquidation Act, Part I, Chapter 631, Florida Statutes ("the Act").

4. The Act is to be interpreted liberally and equitably, as stated in section 631.001, Florida Statutes:

631.001 Title, construction, and purpose.—
(1) This part constitutes and may be cited as the "Insurers Rehabilitation and Liquidation Act.

(2) This part shall be liberally construed to effect the purposes of this part.

(3) The purposes of this part, which are integral elements of the regulation of the business of insurance and are of vital public interest and concern, are to:

(a) Protect the interests of policyholders, creditors, and other claimants and the public.

(b) Provide a comprehensive scheme for administering insurer receiverships.... (emphasis added)

5. The Department submitted two Interim Claims Reports for Court approval in the UHC receivership. At the present time, distribution to claimants is anticipated to be 100% to Class 1, and in excess of 90% to Class 2.

6. The Department submitted four Interim Claims Reports for Court approval in the UHCIC receivership, and has made two partial distributions to claimants in Classes 1-8. The Department anticipates distribution to the remaining claimants to be at least through Class 10.

7. The Department requests the Court to set a bar date in the UHC and UHCIC receiverships for the filing of claims. A bar date will not only prevent any delay in the discharge date that might come from late-filed claims, but will also preserve the funds in these receiverships for those claimants that timely filed claims and are entitled to a distribution.

8. Having a claims bar date will also enable the Department to more efficiently process the final stages necessary to wrap up these receiverships, so that late claims do not interrupt and delay those tasks, such as preparation of the final distribution and discharge accounting, or create a delay in the discharge date by causing the filing of another interim claim report and accompanying objection period.

9. The proposed bar date would be the date of entry of the Order granting this Motion.

WHEREFORE the Department of Financial Services as Receiver for Universal Health Care, Inc., and Universal Health Care Insurance Company, Inc., requests the Court to grant this Motion and enter an Order setting a date certain after which no further claims may be filed.

IT IS HEREBY CERTIFIED that a true and correct copy of this Motion for Court to Set Claims Bar Date was electronically filed with the Clerk of Courts by using the ECF system and electronically noticed this 13th day of March, 2019.

Jody E. Collins, Senior Attorney
Florida Bar No. 500445
Jody.Collins@myfloridacfo.com
Florida Department of Financial Services
Division of Rehabilitation and Liquidation
8240 NW 52 Terrace, Suite 102
Doral, FL 33166
(786) 336-1371 Telephone
(305) 499-2271 Facsimile

Miriam Victorian, Chief Attorney
Florida Bar No. 355471
Miriam.Victorian@myfloridacfo.com
Florida Department of Financial Services
Division of Rehabilitation and Liquidation
2020 Capital Circle, S.E., Suite 300
Tallahassee, FL 32399
(850)413-4408 Telephone
(850) 413-3990 Facsimile