

STATE OF MICHIGAN
CIRCUIT COURT FOR THE 30TH JUDICIAL CIRCUIT
INGHAM COUNTY

E. L. COX, COMMISSIONER OF INSURANCE
FOR THE STATE OF MICHIGAN,

Petitioner,

v

File No. 98-88265-CR

MICHIGAN HEALTH MAINTENANCE
ORGANIZATION PLANS, INC., a
Michigan health maintenance organization,

Hon. James R. Giddings

A.G. No. 1998053333A

Respondent.

E. John Blanchard (P28881)
Michael J. Fraleigh (P36615)
Attorneys for Petitioner, Commissioner of
the Office of Financial & Insurance Services
Michigan Department of Attorney General
Insurance & Banking Division
P.O. Box 30736
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REHABILITATOR'S PETITION FOR APPROVAL
OF
THE PROPOSED REHABILITATION PLAN

NOW COMES FRANK M. FITZGERALD, Commissioner of the Office of Financial and Insurance Services, by JENNIFER M. GRANHOLM, Attorney General of the State of Michigan, and E. John Blanchard and Michael J. Fraleigh, Assistant Attorneys General, who move for entry of an Order approving the Rehabilitation Plan. In support of this Petition the Rehabilitator relies on the authority granted to him in MCL 500.8101 *et seq.* and this Court's orders. In addition, the Rehabilitator specifically relies on MCL 500.8114(4), which, in pertinent part, provides:

If the rehabilitator determines that reorganization, consolidation, conversion, reinsurance, merger, or other transformation of the insurer is appropriate, he or she shall prepare a plan to effect those changes. Upon application of the rehabilitator for approval of the plan, and after notice and hearings as the court may prescribe, the court may either approve or disapprove the plan proposed, or may modify it and approve it as modified. A plan approved under this section shall be, in the court's judgment, fair and equitable to all parties concerned. If the plan is approved, the rehabilitator shall implement the plan.

Respectfully submitted,

JENNIFER M. GRANHOLM
Attorney General

**ORIGINAL SIGNED AND FILED BY
MICHAEL FRALEIGH**

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Dated: March 12, 2002

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