

FILED DATE: 6/11/2021 11:25 AM 2020CH04431

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, CHANCERY DIVISION

FILED  
6/11/2021 11:25 AM  
IRIS Y. MARTINEZ  
CIRCUIT CLERK  
COOK COUNTY, IL  
2020CH04431

**THIS PROCEEDING IS CONFIDENTIAL UNDER  
215 ILCS 5/188.1 AND PURSUANT TO COURT ORDERS**

13654292

IN THE MATTER OF THE )  
CONSERVATION OF NEXTLEVEL ) No. 2020 CH 4431  
HEALTH PARTNERS, INC )

**CONSERVATOR’S MOTION TO EXTEND  
LIMITED LIFT OF SEQUESTRATION**

Dana Popish Severinghaus, Director of the Illinois Department of Insurance, acting solely in her capacity as statutory and court affirmed Conservator (the “Conservator”) of NextLevel Health Partners, Inc. (“NextLevel”), by and through one of her attorneys, hereby moves the Court for entry of an order in the form submitted herewith (the “Agreed Order”) authorizing an extension of the Court’s Agreed Order entered on May 20, 2021, (the “Agreed Order”) and in support thereof states as follows:

1. The parties to this proceeding, including the Conservator, received the Agreed Order on Monday, May 24, 2021.
2. Paragraph 1 of the Agreed Order provides as follows,  
  
Subject to the further order of the Court, the Conservator may have up to 21 days from the date of entry of this Order within which to communicate with the Illinois Department of Health and Family Services (“IDHFS”).
3. After receiving the Agreed Order, the Conservator reached out to IDHFS for purposes initiating discussions with respect to its claim against NextLevel’s assets. Discussions with IDHFS then commenced on May 27, 2021.
4. Matters discussed with IDHFS included the potential impact of a draft *Joint Petition To Set A Date For The Fixing Of Rights And Liabilities, And Deadlines, And Procedures For The Filing Of Claims* (the “Draft Joint Petition”) on the ability of IDHFS to fully and fairly present its claim against

NextLevel's assets under the timeframes and procedures for the fixing of rights and liabilities, the filing of claims, and submission of supporting documentation proposed in the Draft Joint Petition (the "Timeframes").

5. IDHFS indicated that they required time for internal discussions in order to respond to the Conservator's concern as to whether the Timeframes would allow of IDHFS to fully and fairly present its claim against NextLevel's assets.

6. As of the filing of this motion, IDHFS has not yet responded to the Conservator and, therefore, the Conservator requires an extension of the time provided for under the Agreed Order within which the Conservator is authorized to communicate with IDHFS.

7. The Conservator therefore seeks to have the period within which she is authorized under the sequestration order to communicate with IDHFS extended through June 24, 2021.

8. NextLevel is amendable to such limited relief.

WHEREFORE, the Conservator respectfully requests that the Court grant the relief requested in this Motion and enter the Agreed Order submitted herewith.

**Respectfully submitted,**

**Dana P. Severinghaus**

Acting Director of the Illinois Department of Insurance,  
acting solely in her capacity as Conservator of NextLevel  
Health Partners, Inc.

By:   
One of her attorneys

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