



p.o. box 6 • oceanport, new jersey 07757

December 3, 2022

Brian W. Hofmeister, Esq.
Court Appointed Trustee, Affiliated Physicians and Employers Master Trust ("APEMT")
3131 Princeton Pike, Building 5, Suite 110
Lawrenceville, New Jersey 08648

Subject: Invoice for Professional Services, November 2022
Invoice #: DFL013-APEMT

Sent Via Email to: Brian W. Hofmeister (bwh@hofmeisterfirm.com)

Dear Brian:

In accordance with our business understanding for professional services, I am submitting this invoice for payment for services performed for Affiliated Physicians and Employers Master Trust in Bankruptcy ("APEMT") for the period November 1, 2022 through November 30, 2022. A detailed invoice is included as Enclosure 1. There are no Business expenses incurred for the month.

• November Professional Services	\$ 7,800.00	Reviewed and Approved for Payment
• Business Expenses	\$ 0	
	<hr/>	
	\$ 7,800.00	

Please advise if additional information needed.

Very truly yours,

Enclosure: (1)



P.O. Box 6
 Oceanport, New Jersey 07757
 Telephone/Fax: (732) 389-3969

Client: APEMT in Bankruptcy
 Purchase Order #: DFL013 APEMT
 Project Title: Business Consulting
 Project #: 2021-008

INVOICE WORKSHEET

Consultant Name:
Mary Jo Lopez

Period		
From		To
10/29/22		11/30/22

Date	Description	Hours Worked	Hours Billed	Unit Price	Total
11/01/22	Team email discussions regarding Partner Re settlement. Conference call w/ APE\$MT's legal Counsel regarding proposed Partner Re settlement. Communications with Merlino on final damages report.	2.00	2.00	\$100.00	\$200.00
11/03/22	Review of Aetna claim report and sent comments to Sub Chapter V Trustee and APEMT Legal Counsel. Also, identified points for APEMT Legal Counsel to reinforce in Superior Court for the appointment of BWH as Receiver.	2.50	2.50	\$100.00	\$250.00
11/07/22	Prepared draft letter for Windsor proposed APEMT damages. Reviewed Trustee's report and Merlino damages report to prepare letter. Emails to/from team on assorted matters. Prepared draft letter for QualCare identifying issue regarding actuarial services 2016 - 2017.	8.00	8.00	\$100.00	\$800.00
11/08/22	Received comments from APEMT team for both letters. Finalized Windsor Draft letter and sent to APEMT team for final comments and edits. Finalized Qualcare draft letter and sent to team for final comments and edits. Continued to review and assess Partner Re settlement offers, and calculations on 2021 claims. Emails to/from APEMT team on assorted matters.	6.00	6.00	\$100.00	\$600.00
11/09/22	Team conference call with APEMT legal counsel regarding Partner Re settlement. Emails to/from APEMT team on assorted matters.	1.50	1.50	\$100.00	\$150.00
11/10/22	Reviewed Superior Court Judgement appointing BWH Receiver for APEMT. Emails to/from APEMT team on assorted matters.	0.50	0.50	\$100.00	\$50.00
11/11/22	Review of the NAIC 2021 Receiver's Handbook. Began to prepare work plan for Receiver tasks, Operations/Administration, Financial Services & Legal. Emails to/from APEMT team on assorted matters.	2.50	2.50	\$100.00	\$250.00
11/14/22	Team conference call with APEMT's Legal Counsel & CMR re status of the estate. Also discussed the current responsibilities of APEMT's current contracted vendors and CMR. Separate conference call with Receiver's team to discuss next steps. Continue working on Project Plan for Receiver. Emails to/from APEMT team on assorted matters.	4.50	4.50	\$100.00	\$450.00
11/15/22	Reviewed Judge Kaplan's opinion on the IRS Motion to Dismiss for the IRS legal proceeding.	4.50	4.50	\$100.00	\$450.00
11/16/16	Sent sample Project Plan to Receiver's team for comments. Reviewed email exchange on Assessment litigation provided by SM Law representing APEMT. Emails to/from APEMT team on assorted matters.	1.50	1.50	\$100.00	\$150.00
11/17/22	Email exchanges with SM Law, Genova Burns & CMR re: the formula for the Assessment. MJL researched regulations, APEMT Executive & Finance Committee meetings notes and committee minutes. MJL sent emails to team regarding information and findings. Emails to/from APEMT team on assorted matters.	3.00	3.00	\$100.00	\$300.00

Date	Description	Hours Worked	Hours Billed	Unit Price	Total
11/18/22	Meeting with CMR senior management at Office in Chester, New Jersey. Receiver participated via telephone. Reviewed status of Claims; Customer support services; communications with Members and interested parties; Cyber policy renewal and other matters reviewed by the Receiver. Authorized sending communication to members regarding Pharmacy Benefit & Drug Cost Reporting required by Federal law. Contact with Bank of America regarding Receiver's authority on Bank accounts. Email exchange with SM Law regarding Assessment litigation. Emails to/from APEMT team on assorted matters.	5.50	5.50	\$100.00	\$550.00
11/20/22	Finalize Receiver's Project Plan for team review on 11/21/22. Read Lawsuit complaint sent by SM Law to review and provide comments. Found additional information to share with SM Law in Superior Court Judgement 11/10/22. Sent additional information to SM Law & Receiver's team. Email to CMR on behalf of Receiver authorizing Pharmacy Communication to Members via Constant Contact. Emails to/from APEMT team on assorted matters.	11.00	8.00	\$100.00	\$800.00
11/21/22	Meeting at Receiver's Office with Receiver's Legal Counsel. Reviewed Receiver Project Plan prepared by MJL. Made corrections to Project Plan. Reviewed key issues identified in NAIC's 2021 Receiver's Handbook. Conference calls with numerous parties regarding the estate, including SM Law and the collection of assessments and current litigation activities. Reviewed Bankruptcy APEMT Bar Date Registry totaling 81 claims. Communications with CMR regarding status of Bar Date claims. Finalized with Receiver's Legal Counsel letters for EANJ, Windsor and QualCare. Emails to/from APEMT team on assorted matters.	9.50	8.00	\$100.00	\$800.00
11/22/22	Reviewed CMR listing for ongoing services for APEMT during Bankruptcy. Contacted Bank of America with Judgment information on behalf of the Receiver to obtain authority for all APEMT Bank accounts. Emails to/from APEMT team on assorted matters.	1.50	1.50	\$100.00	\$150.00
11/23/22	Emails to/from APEMT team on assorted matters.	1.00	1.00	\$100.00	\$100.00
11/27/22	Updated CMR tasks to support Receiver and sent to Team for review and comments. Prepared tasks for DFL for the Receiver and sent to team for review and comments. Sent Receiver's documents to TD Bank for control of the account. Emails to/from APEMT team on assorted matters.	7.50	7.50	\$100.00	\$750.00
11/28/22	Prepared 'white paper' for SM Law regarding the Liability of Members with a MEWA an understanding the difference between 17B27C(7c) & (7d). Sent materials to APEMT team and SM Law for conference call to discuss the litigation. Additionally, sent information provided by CMR regarding the Assessment calculation. Conference call with CMR on assorted matters. Conference call with Receiver on assorted matters. Emails to/from APEMT team on assorted matters.	6.50	6.50	\$100.00	\$650.00
11/29/22	Discussion with Merlino regarding claim database and creation of EOBs for law firms. Discussion with CMR regarding the cataloging of claims in DeerWalk. Discussed Claim reports for the Receiver's Court reporting and subrogation of claims. Emails to/from APEMT team on assorted matters.	2.00	2.00	\$100.00	\$200.00
11/30/22	Conference call with Receiver regarding assorted matters. Conference call with Receiver, Aetna & CMR regarding outstanding medical and pharmacy claims for estate. Follow-up call with Receiver regarding after action requirements,	1.50	1.50	\$100.00	\$150.00
		82.5	78.00		\$7,800.00

Reviewed and Approved for Payment