SUPERIOR COURT FOR THE DISTRICT OF COLUMBIA Civil Division

DISTRICT OF COLUMBIA, Department of Insurance, Securities and Banking,

Petitioner,

v.

DC CHARTERED HEALTH PLAN, INC.,

Civil Action No.: 2012 CA 008227 2 Judge: Melvin R. Wright Next Event: Status Hearing August 21, 2013 at 9:30 a.m.

Respondent.

NOTICE OF FILING OF SETTLEMENT AGREEMENT BETWEEN D.C. CHARTERED HEALTH PLAN INC. AND THE DISTRICT OF COLUMBIA

This Notice of Filing is to inform the Court of a settlement agreement ("agreement") between the District of Columbia, acting through the Office of Attorney General for the District of Columbia, on behalf of the Department of Health Care Finance ("DHCF"), and D.C. Chartered Health Plan, Inc. ("Chartered"), acting through William P. White, Commissioner of the District Department of Insurance, Securities and Banking, in his capacity as Rehabilitator of Chartered. Subject to the court's approval, this agreement resolves Chartered's contract claims of \$61 million that were asserted against DHCF in proceedings before the Contract Appeals Board (CAB), as well as other potential claims. As indicated in the attached agreement, the CAB cases were settled for \$48 million. The agreement also settles, releases and extinguishes any and all claims that Chartered may have had or could have asserted in any forum against the District of Columbia and its current and former officers, officials and employees. The *Settlement Agreement and Release* is filed at this time for the convenience of the Court. The Rehabilitator will shortly file a formal petition seeking an order from this Court approving the settlement agreement pursuant to the Order of Rehabilitation.

Respectfully submitted,

TROUTMAN SANDERS, LLP

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Attorneys for the Rehabilitator and the Special Deputy to the Rehabilitator

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of July, 2013, a copy of the foregoing *Notice of*

Filing Of Settlement Agreement Between D.C. Chartered Health Plan Inc. and the District of

Columbia was filed and served by email upon:

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/s/ Prashant K. Khetan

Prashant K. Khetan