

19TH JUDICIAL DISTRICT COURT FOR THE PARISH OF EAST BATON ROUGE

STATE OF LOUISIANA

NUMBER: 641 928

SECTION: 26

JAMES J. DONELON
COMMISSIONER OF INSURANCE FOR THE STATE OF LOUISIANA

VERSUS

LOUISIANA HEALTH COOPERATIVE, INC.

COST OK \$ State
FEB 12 2016

FILED: _____

DEPUTY CLERK OF COURT

Filed on Behalf of - State of Louisiana - State Pays No Court Costs
La. R.S. 13:4521

MOTION FOR AUTHORITY TO SELL FURNITURE, FIXTURES AND EQUIPMENT
NO LONGER IN USE

NOW INTO COURT, through the undersigned counsel comes Louisiana Health Cooperative, Inc. in Rehabilitation ("LAHC"), appearing herein through Billy J. Bostick, court appointed Receiver of LAHC by order of this Court, who respectfully represents that:

1.

LAHC was placed in rehabilitation by orders of this Court on September 1, and September 21, 2015.

2.

LAHC is the owner of various furniture, fixtures and equipment that needs to be sold in order to maximize LAHC's assets. The subject furniture, fixtures and equipment is being maintained at the LAHC office in Metairie, Louisiana; however, due to downsizing and relocation of staff, the furniture, fixtures and equipment are no longer needed and no longer in use.

3.

A recent inventory of such items was completed and the results of that inventory are attached as Exhibit "A."¹

REC'D C.P.

FEB 19 2016

4.

The Receiver avers that LAHC has no need to retain the items shown on Exhibit A as they are no longer in use and that it is in the best interest of the estate to sell them in order to avoid the additional costs for further storage, advertising, moving and sales costs.

EBR3419447

¹ The inventory shows that the furniture, fixtures and equipment consists primarily of a number of desks, chairs, tables, file cabinets, bookcases, and various other items.

REC'D C.P.

5.

The Receiver shows that he sought and obtained offers from three (3) independent furniture liquidators to purchase and remove the furniture, fixtures and equipment listed on Exhibit "A". Those quotes are attached as Exhibit "B", "C", and "D". .

6.

The Receiver, therefore, requests that he be authorized and directed to accept the offer from DKI Office Furniture, marked as "Exhibit B," for Nine Thousand Two Hundred Fifty Five (\$9,255.00) Dollars, which is the highest of the three offers obtained by the Receiver, as the most cost effective means of be authorized and directed to sell the furniture, fixtures and equipment listed on Exhibit "A"

WHEREFORE, LAHC prays that this Court enter an order authorizing and directing the LAHC Receiver to sell the LAHC furniture, fixtures and equipment listed on Exhibit A, which are no longer in use, to the highest bidder, DKI Office Furniture, for Nine Thousand Two Hundred Fifty Five (\$9,255.00) Dollars.

Respectfully Submitted,

JEFF LANDRY
LOUISIANA ATTORNEY GENERAL

BY: 

SUE BUSER (#18151)
CELESTE BRUSTOWICZ (#168350)
DENNIS J. PHAYER, ESQ. (#23747)
BURGLASS & TANKERSLEY, LLC
5815 Airline Drive
Metairie, Louisiana 70001-5602
Phone: (504) 836-2220
Telefax: (504) 836-2221

Attorneys for JAMES J. DONELON, Commissioner of Insurance for the State of Louisiana as Rehabilitator of Louisiana Health Cooperative, Inc. in Rehabilitation

FILED
EAST BATON ROUGE PARISH, LA

2006 FEB 12 PM 1:33

19TH JUDICIAL DISTRICT COURT FOR THE PARISH OF EAST BATON ROUGE

STATE OF LOUISIANA

NUMBER: 641,928

DIVISION: "D"

JAMES J. DONELON
COMMISSIONER OF INSURANCE FOR THE STATE OF LOUISIANA

VERSES

LOUISIANA HEALTH COOPERATIVE, INC.

FILED: _____ DEPUTY CLERK

ORDER

Considering the motion of Louisiana Health Cooperative, Inc. in Rehabilitation ("LAHC") to sell the LAHC furniture, fixtures and equipment no longer in use, and the Court finding that the relief granted is in the best interests of the LAHC policyholders, members, subscribers, enrollees and creditors and the public and that the mover is entitled to the relief requested,

IT IS ORDERED that the motion to sell the furniture, fixtures and equipment no longer being utilized by LAHC be and hereby is granted.

IT IS ORDERED that the Receiver is authorized and directed to accept the offer from DKI Office Furniture for \$9,255.00 for the LAHC furniture, fixtures and equipment no longer in

use.
IT IS ORDERED that the Receiver be and hereby is authorized to deposit funds realized from the sale of the LAHC furniture, fixtures and equipment into the rehabilitation account for LAHC for use in the pending rehabilitation proceeding.

Baton Rouge, Louisiana, this 16 day of February 2016

DISTRICT COURT JUDGE DONALD JOHNSON

FILED
EAST BATON ROUGE PARISH, LA
2016 FEB 22 AM 1:33
DEPUTY CLERK OF COURT

19TH JUDICIAL DISTRICT COURT FOR THE PARISH OF EAST BATON ROUGE

STATE OF LOUISIANA

NUMBER: 641 928

SECTION: 26

JAMES J. DONELON
COMMISSIONER OF INSURANCE FOR THE STATE OF LOUISIANA

VERSUS

LOUISIANA HEALTH COOPERATIVE, INC.

FILED: _____

DEPUTY CLERK

**MEMORANDUM IN SUPPORT OF MOTION FOR AUTHORITY TO
SELL FURNIURE, FIXTURES AND EQUIPMENT**

MAY IT PLEASE THE COURT:

LAHC was placed in rehabilitation by orders of this honorable Court on September 1 and September 21, 2015. LAHC continued business as usual for LAHC through December 31, 2015 and no longer has any active policies of insurance and/or subscriber agreements, which permitted downsizing of the LAHC staff and office space in use. LAHC is the owner of the furniture, fixtures and equipment that is no longer in use and that should be sold in order to maximize LAHC's assets. A recent inventory of such items was completed and the results of that inventory are attached as Exhibit "A." The Receiver avers that due to downsizing and reduction in and relocation of staff, LAHC has no need to retain the subject furniture, fixtures and equipment, which are incurring and will continue to incur storage costs, and that it is in the best interest of the estate to sell all such items.

The Receiver obtained offers from three (3) independent furniture liquidators to purchase and remove the furniture, fixtures and equipment listed on Exhibit "A". Those quotes are attached as Exhibit "B", "C", and "D". The Receiver requests that he be authorized and directed to accept the offer from DKI Office Furniture, marked as "Exhibit B" for \$9,255.00, which is the highest of the three offers obtained, in order to avoid additional costs for further storage, advertising, moving and costs of sale of the LAHC furniture, fixtures and equipment no longer in use.

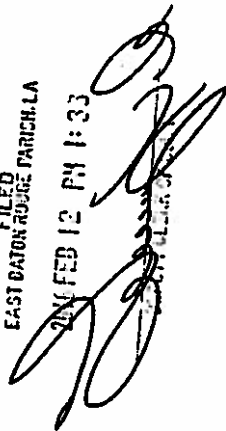
EBR341948

Respectfully submitted,

JEFF LANDRY
LOUISIANA ATTORNEY GENERAL

BY: 

SUE BUSER (#18151)
CELESTE BRUSTOWICZ (#168350)
DENNIS J. PHAYER, ESQ. (#23747)
BURGLASS & TANKERSLEY, LLC
5213 Airline Drive
Metairie, Louisiana 70001-5602
Phone: (504) 836-2220
Telefax: (504) 836-2221
Attorneys for JAMES J. DONELON, Commissioner of Insurance for the State of
Louisiana as Rehabilitator of Louisiana Health Cooperative, Inc. in Rehabilitation


FILED
EAST BATON ROUGE PARISH, LA
2011 FEB 12 PM 1:33
PARISH CLERK

19TH JUDICIAL DISTRICT COURT FOR THE PARISH OF EAST BATON ROUGE

STATE OF LOUISIANA

NUMBER: 641 928

SECTION: 26

JAMES J. DONELON
COMMISSIONER OF INSURANCE FOR THE STATE OF LOUISIANA
VERSUS
LOUISIANA HEALTH COOPERATIVE, INC.

FILED: _____

DEPUTY CLERK

AFFIDAVIT

BEFORE ME, the undersigned authority, personally came and appeared

BILLY J. BOSTICK

who after by me being duly sworn did depose and state:

That he is the court appointed Receiver for LOUISIANA HEALTH COOPERATIVE, INC. IN REHABILITATION, (hereinafter "LAHC").

That he has read the Motion, Order, and Memorandum for Authority Sell Furniture, Fixtures and Equipment attached hereto and avers that the allegations contained therein are true and correct to the best of his knowledge.

That he agrees that it is in the best interest of the estate to sell the subject LAHC furniture, fixtures and equipment to DKI Office Furniture in order to avoid future costs for storage, advertising, moving and costs of sale.

The above is true and correct to the best of his knowledge.


BILLY J. BOSTICK

SWORN TO AND SUBSCRIBED before me,
Notary Public this 6th day of February, 2016.


NOTARY PUBLIC

FILED
EAST BATON ROUGE PARISH, LA
FEB 12 PM 1:38



EXHIBITS

- Exhibit A Inventory of Unused LAHC Furniture, Fixtures and Equipment
- Exhibit B DKI offer for LAHC Furniture, Fixtures and Equipment
- Exhibit C Office Planning Group offer for LAHC Furniture, Fixtures and Equipment
- Exhibit D CFL Furniture & Antiques LAHC Furniture, Fixtures and Equipment

Affidavit of Receiver, Billy Bostick

Respectfully submitted,

**JEFF LANDRY
LOUISIANA ATTORNEY GENERAL**

BY: *Sue Buser*

SUE BUSER (#18151)
CELESTE BRUSTOWICZ (#168350)
DENNIS J. PHAYER, ESQ. (#23747)
BURGLASS & TANKERSLEY, LLC
5213 Airline Drive
Metairie, Louisiana 70001-5602
Phone: (504) 836-2220
Telefax: (504) 836-2221
Attorneys for JAMES J. DONELON, Commissioner of Insurance for the State of Louisiana as Rehabilitator of Louisiana Health Cooperative, Inc. in Rehabilitation

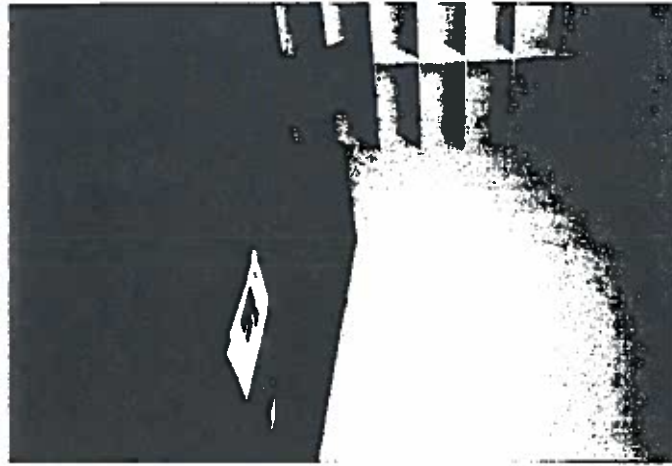
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FEB 12 2018
[Signature]
DEPUTY CLERK OF COURT
1:33 PM

LAMC NORTH INVENTORY

OFFICE	DESK	DESK CHAIR	DESK AND SOFT PANEL	GUEST CHAIR	ROUND TABLE	FILE CABINET	BOOKCASE	DESK W/CH	SM OFFICE BRD	LG OFFICE BRD	TIG OFFICE BRD	LG DESK CHAIR	NARROW FILE CABINET
24	X	X	X	X									
25	X	X	X	X									
16	X	X	X	X									
28	X	X	X	X									
29	X	X	X	X									
30	X	X	X	X									
31	X	X	X	X									
32	X	X	X	X									
33	X	X	X	X									
34	X	X	X	X									
35	X	X	X	X									
36	X	X	X	X									
37	X	X	X	X									
38	X	X	X	X									
39	X	X	X	X									
40	X	X	X	X									
41	X	X	X	X									
42	X	X	X	X									
43	X	X	X	X									
44	X	X	X	X									
45	X	X	X	X									
46	X	X	X	X									
47	X	X	X	X									
48	X	X	X	X									
49	X	X	X	X									
50	X	X	X	X									
51	X	X	X	X									
52	X	X	X	X									
53	X	X	X	X									
54	X	X	X	X									
55	X	X	X	X									
56	X	X	X	X									
57	X	X	X	X									
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94	X	X	X	X									
95	X	X	X	X									
96	X	X	X	X									
97	X	X	X	X									
98	X	X	X	X									
99	X	X	X	X									
100	X	X	X	X									
TOTALS	20	45	4	30	3	8	3	4	4	5	4	1	1

EXHIBIT
EBR3419450





Desk with side desk extension



Small desk chair



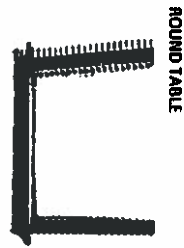
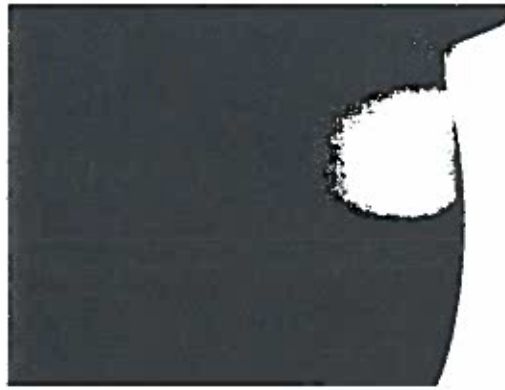
Desk without a side extension



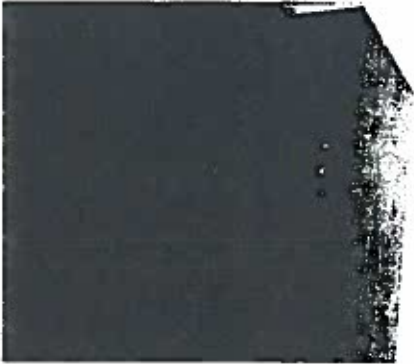
Guest chair

1

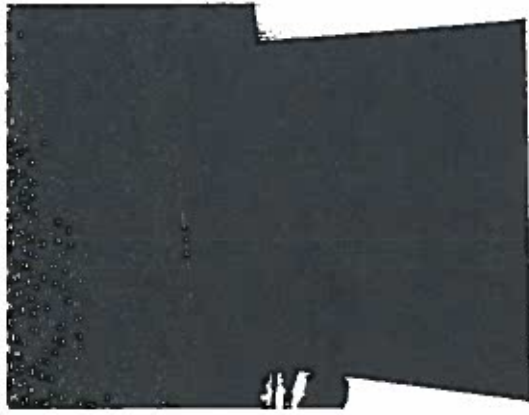




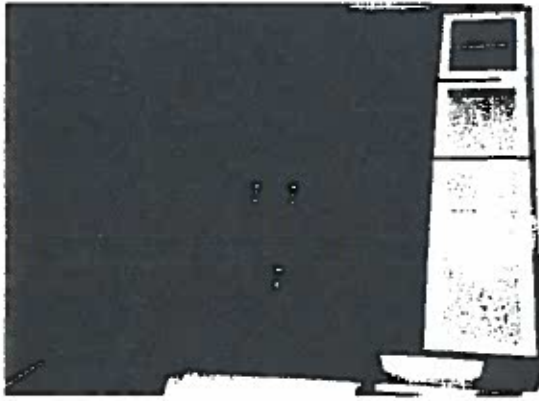
ROUND TABLE



2 draw matching furniture file cabinet



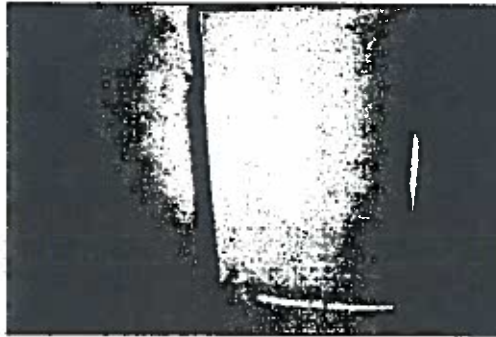
Backcase



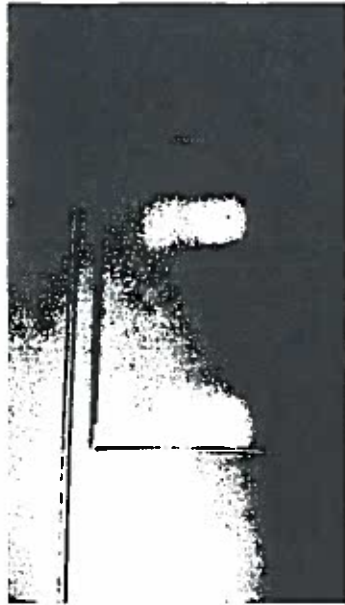
Desk Hutch



Small area board



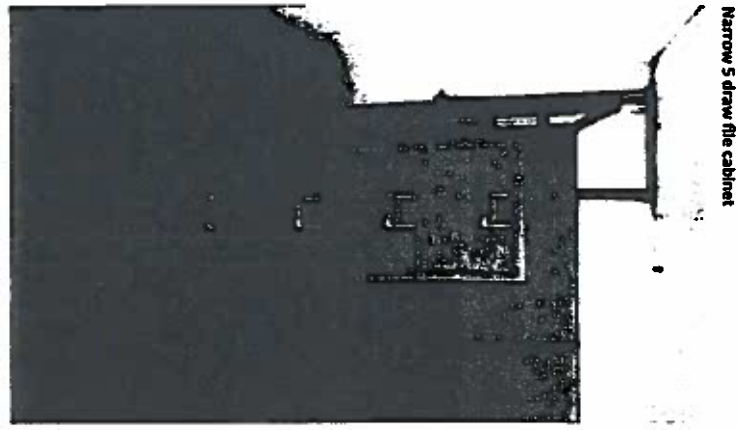
Large crate board

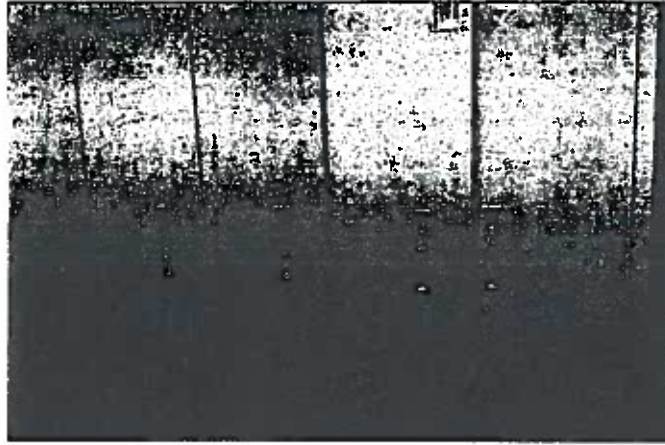


Extra large erase board



Large desk chair





Tall White Screw Pine cabinet



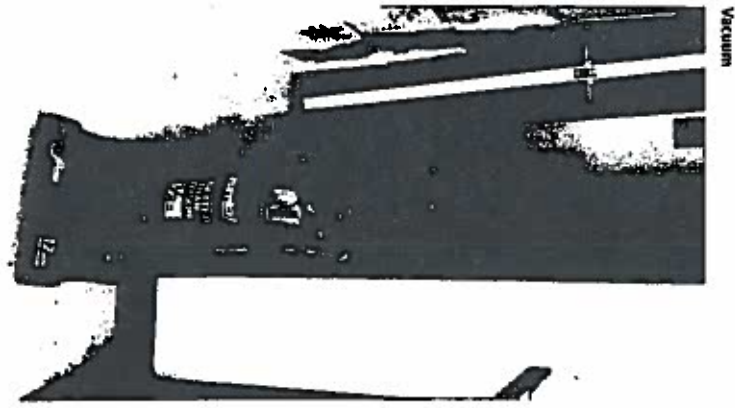
Small conference room table

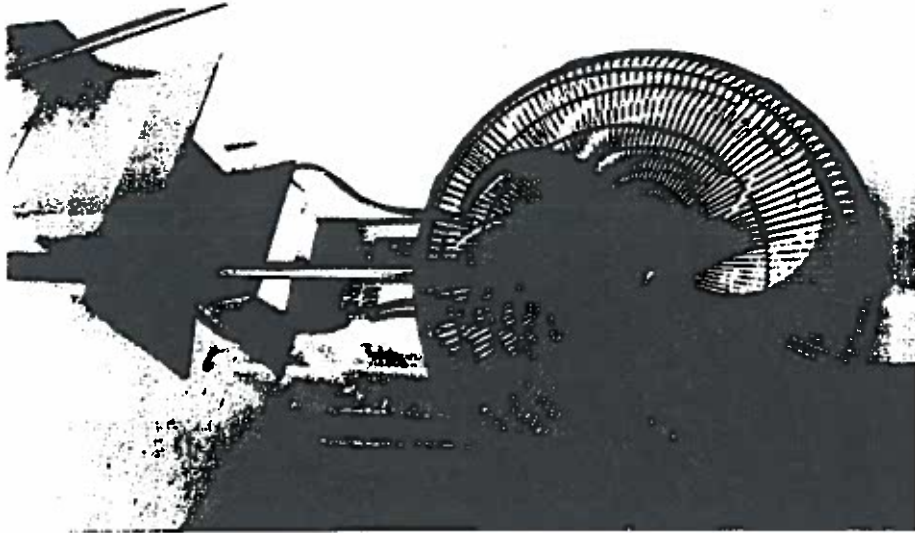


Break room table, break room chairs and lac board

fac board

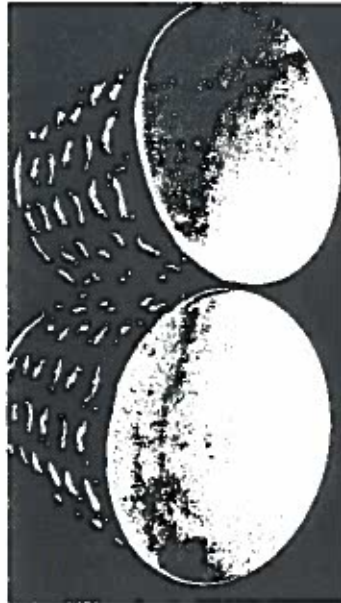




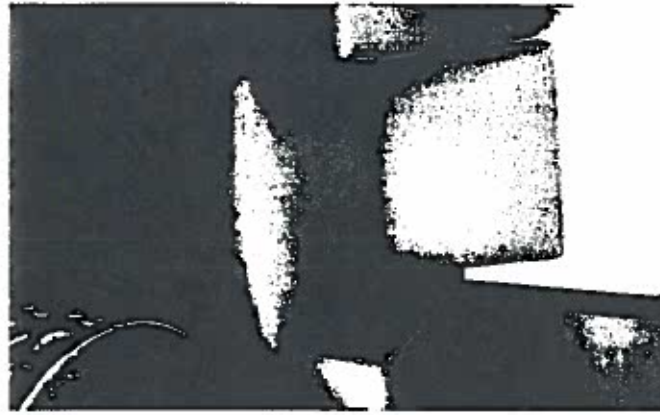




Love seat



Small tablets



Matching chairs



Aug

6630 Jefferson Highway
 Metairie, LA 70123



T: (504) 734-4444 F: (504) 732-1988
 www.dki@concoffices.com

Company: **LA HEALTH CARE COOPERATIVE**
 Contact: **CARA BOSTICK**
 Address: _____
 Address: _____
 City: _____ State: **LA** Zip: _____
 Phone: _____ Fax: _____

Quote No. _____
 Date _____
 Sales Rep. _____

Qty	Model	Description	Unit Price	TOTAL	FMV
BREAK DOWN OF VALUE					
16	MODULAR	WORKSTATION 6 x 8 W 2 PEDS 1 FLUPPER 1 SHELF 2 TASK LIGHT FMV	250.00	\$ 3,750.00	
45	MESH TASK CHAIRS	MESH BLACK W ADJUSTING FMV	600.00	\$ 27,000.00	9,000.00
30	MESH GUEST CHAIRS	CHAIR GUEST MESH w/ ARMS FMV	25.00	\$ 750.00	2,250.00
18	OFFICES	PRIVATE OFFICE w/ L SHAPE DESK FMV	35.00	\$ 630.00	1,050.00
4	CORNER OFFICES	PRIVATE OFFICE w/ U SHAPE DESK FMV	250.00	\$ 1,000.00	3,600.00
10	FILES	LATERAL FILES FMV	625.00	\$ 6,250.00	2,500.00
1	BREAKROOM	TABLE AND CHAIR SET UP FMV	35.00	\$ 35.00	1,250.00
1	LOUNGE SEATING	LOBBY 2 LOUNGE 2 TABLES FMV	125.00	\$ 125.00	125.00
1	CONFERENCE ROOM TABLE	CONFERENCE ROOM TABLE FMV	425.00	\$ 425.00	425.00
	BOARDS	DRY ERASE BOARD ASSTD REEDS FMV	50.00	\$ 50.00	100.00
13	MSC	BOOKCASE LATERAL FILES INCLUDED IN ABOVE PRIVATE OFFICES FMV	10.00	\$ 130.00	130.00
11 pieces	SHELVING	NO WALLS			

PRICES ARE GOOD FOR 30 DAYS

Acceptance

AGREEMENT - A signed DKi invoice quote or the customer company purchase order are the only documents accepted and required for delivery and a 50% deposit is required to schedule.
OFFICE - Standard office chairs require 10% deposit, a signed DKi quote, and are non-refundable.
DELIVERY - All furniture orders under \$500.00 must be paid in full upon delivery. A 50% deposit is required on all orders over \$500.00 with the remainder due at time of delivery.
WARRANTY - There is a standard 90 day warranty on all furniture orders. Any unusual delivery, must be authorized by management and will result in additional fees. Please have all existing furniture and equipment removed from area prior to delivery. DKi employees do not collect or handle other furniture or equipment. DKi employees make time and effort for delivery safety items.
ADDITIONAL TERMS OF SERVICE - Cash, Company Check, Visa, Mastercard, Discover and American Express
 10% of Purchase Price for the first 90 days after the date of purchase. 10% of Purchase Price for the next 90 days. 10% of Purchase Price for the next 90 days. 10% of Purchase Price for the next 90 days. 10% of Purchase Price for the next 90 days.
 TERMS AND CONDITIONS: See back of invoice for details. Terms, Pricing & Delivery to your location. SEE OTHER INFORMATION FOR DETAILS.
 NAME: _____ PHONE: _____ DATE: _____
 SIGNATURE: _____

[Signature] Michael J. Jacobs DKi 2/8/16

Subtotal	\$ 6,250.00	20,430.00
SALES TAX	\$ 0.00	
DELIVERY	\$ 0.00	
TOTAL	\$ 6,250.00	20,430.00



Cara Bostick

From: John Jacobs <john.jacobs@dkiofficesolutions.com>
Sent: Friday, January 29, 2016 7:48 AM
To: Cara Bostick
Subject: RE: North Inventory with picture description
Attachments: LA HEALTHCARE COOPERATIVE.xls

Cara:

Thank you for taking the time to show me the furniture. Here is the amount we can pay for each line item. You can extrapolate the figures to the quantity on hand. The line item under each shows what you can offer to a potential sublease tenant. These are very attractive and fair prices for both.

I have arrived at these prices based on the condition, the fact that it can only be removed at night, the storage costs involved, and the current market for pre-owned furniture in the Greater New Orleans area.

Thank you

John Jacobs

From: Cara Bostick [<mailto:cbostick@mylahc.org>]
Sent: Wednesday, January 27, 2016 10:22 AM
To: John Jacobs
Subject: RE: North Inventory with picture description

Sorry I said 8th floor but it is suite 800, we occupy the entire floor. I will be here at 1:00 p.m. to meet you.

From: John Jacobs [<mailto:john.jacobs@dkiofficesolutions.com>]
Sent: Tuesday, January 26, 2016 1:01 PM
To: Cara Bostick <cbostick@mylahc.org>
Subject: RE: North Inventory with picture description

Cara:

I can meet you at 1:00. What Suite is it?

John
Cell 504-259-1701

From: Cara Bostick [<mailto:cbostick@mylahc.org>]
Sent: Tuesday, January 26, 2016 11:16 AM
To: john.jacobs@dkiofficesolutions.com
Cc: Cara Bostick
Subject: FW: North Inventory with picture description

John,

I called your office this morning to discuss you meeting me at the Louisiana Health Cooperative at 3445 N. Causeway, Metairie, La. tomorrow afternoon.

I have attached an inventory of the items I have and attached "sample pictures" of the furniture. All of the furniture is the same style and was purchased at the end of 2013, has keys and is in excellent condition.

Please call me at 225-201-0107, hit the # sign and 228 when the recording comes on. I can also be reached at 225-993-8584 (cell). Tomorrow after 10:00 a.m., I can be reached at the company number of 504- 265-1924. I have vacated the space where this furniture is located and am wanting to find out its value to seek approval to sell it.

*Thank you,
Cara Bostick*

From: Terry Delaney
Sent: Friday, January 22, 2016 12:24 PM
To: Cara Bostick <cbostick@mylahc.org>; Philip D'Antonio <philip@mylahc.org>; Billy Bostick <bbostick@mylahc.org>; Billy Bostick <billy.bostick@bccg.com>
Subject: North Inventory with picture description

Attached is the Inventory from the North with picture descriptions for items.

Terry Walsh
Receptionist
Louisiana Health Cooperative
3445 N. Causeway Blvd. Ste., 800
Metairie, LA 70002
(504)684-2095

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For more information please visit <http://www.mimecast.com>

This email has been scanned for email related threats and delivered safely by Mimecast.
For more information please visit <http://www.mimecast.com>

Cara F. Bostick

From: Jerry Maxwell <opg@bellsouth.net>
Sent: Friday, February 5, 2016 11:03 AM
To: 'Cara F. Bostick'
Subject: RE: LAHC furniture/fixtures @3445 N. Causeway

Cara,

Thanks for sending. We would offer \$4000 for the lot. Fair market value, retail is about \$8-10,000.

Let me know if there is anything else you need.

Jerry Maxwell
The Office Planning Group
4735 Sanford St.
Metairie, LA 7000-6
504 454-3316
opg@bellsouth.net
www.officeplanninggroup.com

From: Cara F. Bostick [mailto:cara.bostick@bccg.com]
Sent: Thursday, February 4, 2016 3:46 PM
To: opg@bellsouth.net
Subject: LAHC furniture/fixtures @3445 N. Causeway

Jerry,

Thank you so much for returning my call. Here is the list. Any help you can render is greatly appreciated.

Thank you,

Cara F. Bostick
Louisiana Health Cooperative in Rehabilitation
Bostick Crawford Consulting Group, LLC
225-993-8584 (cell)
Bostick Crawford



***CFL Furniture & Antiques, Inc.
3534 Toulouse St
New Orleans, LA 70119***

February 5, 2016

Cara Bostick
Bostick Crawford Consulting Group, LLC

Dear Ms. Bostick,

As per our conversation, we are offering \$2500.00 for all the office furnishings listed in the LAHC North Inventory. Our company is absorbing all of the costs to liquidate the inventory which includes, but is not limited to, breaking down the furniture, packing, loading and transporting of the inventory.

We look forward to doing business with you.

Sincerely,



Holis Hannan
CFL Furniture & Antiques, Inc.



Cara F. Bostick

From: Canal Furniture Liquidators <canalfurnitureliquidators@yahoo.com>
Sent: Friday, February 5, 2016 3:06 PM
To: Cara F. Bostick
Subject: Re: LAHC furniture
Attachments: lahc 001.tif

Please see attached offer.

Thank you,

Holis Hannan
President
Canal Furniture Liquidators
3534 Toulouse Ave.
New Orleans, LA 70119
(504)482-8851
(504)913-0576
www.canalfurnitureliquidators.com

On Tuesday, February 2, 2016 10:06 AM, Cara F. Bostick <cara.bostick@bccg.com> wrote:

Good Morning Holis,

I pulled the vendor files from where the furniture was purchased and there is no mention of a brand except on the chairs. The vendor description just same CAM and a number. All of the furniture was purchased from The Office Planning Group.

If you can get those prices to me today, I would greatly appreciate it. You were going to give me two prices...one to take everything and the FMV.

*Thank you,
Cara*

Bostick Crawford Consulting Group, LLC
225-993-8584 (cell)