

JAMES J. DONELON, COMMISSIONER
OF INSURANCE FOR THE STATE OF
LOUISIANA, IN HIS CAPACITY AS
REHABILITATOR OF LOUISIANA
HEALTH COOPERATIVE, INC.

FILED
EAST BATON ROUGE, LA
SUITE NO. 651,069 SECTION: 22
2017 MAY -2 PM 2:17

versus

DEPUTY CLERK OF COURT
19TH JUDICIAL DISTRICT COURT

TERRY S. SHILLING, GEORGE G.
CROMER, WARNER L. THOMAS, IV,
WILLIAM A. OLIVER, CHARLES D.
CALVI, PATRICK C. POWERS, CGI
TECHNOLOGIES AND SOLUTIONS,
INC., GROUP RESOURCES
INCORPORATED, BEAM PARTNERS,
LLC, MILLIMAN, INC., BUCK
CONSULTANTS, LLC. AND
TRAVELERS CASUALTY AND
SURETY COMPANY OF AMERICA

PARISH OF EAST BATON ROUGE
STATE OF LOUISIANA

MOTION TO COMPEL AND INCORPORATED MEMORANDUM IN SUPPORT

At the status conference of April 18, 2017, and pursuant to the Order of this Court (see attached Exhibit A, copy of Order filed herein on April 26th), it was agreed that the director and officer defendants would produce any and all potentially applicable insurance policies (other than Travelers' policies issued to LAHC) as soon as practicable; and, furthermore, if additional policies were not produced prior to May 2, 2017, that Plaintiff would file an appropriate Motion to Compel the same which would be heard, if necessary, on May 30, 2017.

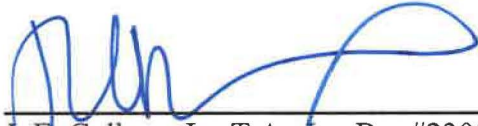
On April 19, 2017, Plaintiff propounded formal written discovery to all of the director and officer defendants regarding any additional insurance policies which may provide coverage in this suit (see attached Exhibit B, copy of this written discovery propounded to the director and officer defendants: Terry S. Shilling, George G. Cromer, Warner L. Thomas, IV, William A. Oliver, Charles D. Calvi, and Patrick C. Powers). On or about April 20, 2017, defendants Oliver and Thomas responded to Plaintiff's discovery requests and produced copies of six (6) insurance policies which may provide coverage herein. Because defendants Oliver and Thomas have formally responded to this written discovery and produced copies of other insurance policies, Plaintiff's Motion to Compel is not directed at them.

To date, counsel for the other director and officer defendants (Terry S. Shilling, George G. Cromer, Charles D. Calvi, and Patrick C. Powers) have verbally informed undersigned counsel that it is unlikely that any other insurance policies apply herein. To date, however, none of these other director and officer defendants have produced any policies or formally responded to

Plaintiff's written discovery; therefore, pursuant to the prior Order of this Court, Plaintiff files this simple Motion to Compel to preserve its right to demand the production of any such policies.

It is expected that the director and officer defendants will respond to Plaintiff's written discovery appropriately and produce copies of any other insurance policies in advance of the May 30, 2017 hearing regarding this Motion to Compel. Of course, if and when the director and officer defendants respond to Plaintiff's written discovery, Plaintiff will voluntarily dismiss its Motion to Compel and inform this Court accordingly. Only in the event that any director or officer defendant fails to respond to Plaintiff's written discovery does Plaintiff intend to demand a hearing regarding this Motion to Compel on May 30, 2017.

Respectfully submitted,



J. E. Cullens, Jr., T.A., La. Bar #23011
Edward J. Walters, Jr., La. Bar #13214
Darrel J. Papillion, La. Bar #23243
David Abboud Thomas, La. Bar #22701
Jennifer Wise Moroux, La. Bar #31368
**WALTERS, PAPILLION,
THOMAS, CULLENS, LLC**
12345 Perkins Road, Bldg One
Baton Rouge, LA 70810
Phone: (225) 236-3636
Facsimile: (225) 236-3650

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing has been furnished via U.S. Mail, postage prepaid, and via e-mail to all counsel of record as follows:

Thomas McEachin
Schonekas, Evans, McGoey & McEachin, LLC
909 Poydras Street, Suite 1600
New Orleans, Louisiana 70112

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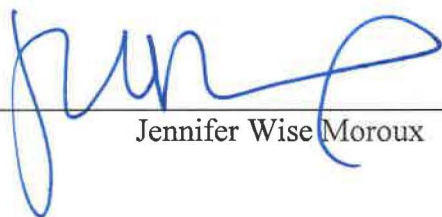
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Liskow & Lewis
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701 Poydras Street, #5000
New Orleans, LA 70139

Matt J. Farley
Krebs Farley
400 Poydras Street, #2500
New Orleans, LA 70130

Baton Rouge, Louisiana this 2nd day of May, 2017.



Jennifer Wise Moroux

JAMES J. DONELON, COMMISSIONER
OF INSURANCE FOR THE STATE OF
LOUISIANA, IN HIS CAPACITY AS
REHABILITATOR OF LOUISIANA
HEALTH COOPERATIVE, INC.

SUIT NO.: 651,069 SECTION: 22

versus

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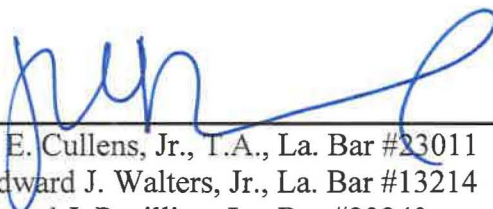
PARISH OF EAST BATON ROUGE

STATE OF LOUISIANA

UNIFORM LOCAL RULE 10.1 CERTIFICATE

Pursuant to Uniform Local Rule 10.1, undersigned counsel hereby certifies that he has conferred with counsel for defendants regarding the current discovery, and defendants' counsel have informed undersigned counsel that it is unlikely that any other insurance policies apply herein. To date, however, none of these other director and officer defendants have produced any policies or formally responded to Plaintiff's written discovery; therefore, pursuant to the prior Order of this Court, Plaintiff files this simple Motion to Compel to preserve its right to demand the production of any such policies.

Respectfully submitted,



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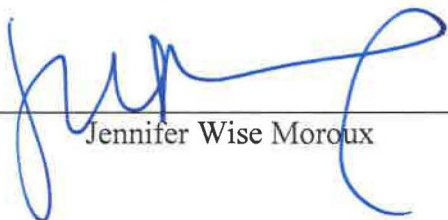
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Jennifer Wise Moroux

JAMES J. DONELON, COMMISSIONER	:	SUIT NO.: 651,069 SECTION: 22
OF INSURANCE FOR THE STATE OF	:	
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REHABILITATOR OF LOUISIANA	:	
HEALTH COOPERATIVE, INC.	:	
	:	
versus	:	19 TH JUDICIAL DISTRICT COURT
	:	
TERRY S. SHILLING, GEORGE G.	:	
CROMER, WARNER L. THOMAS, IV,	:	
WILLIAM A. OLIVER, CHARLES D.	:	
CALVI, PATRICK C. POWERS, CGI	:	
TECHNOLOGIES AND SOLUTIONS,	:	PARISH OF EAST BATON ROUGE
INC., GROUP RESOURCES	:	
INCORPORATED, BEAM PARTNERS,	:	
LLC, MILLIMAN, INC., BUCK	:	
CONSULTANTS, LLC. AND	:	
TRAVELERS CASUALTY AND	:	
SURETY COMPANY OF AMERICA	:	STATE OF LOUISIANA

ORDER

Considering the foregoing Motion to Compel Discovery:

IT IS HEREBY ORDERED that defendants, Terry S. Shilling, George G. Cromer, Charles D. Calvi, and Patrick C. Powers, appear and show cause on the 30th day of May, 2017, at 9:30 a.m., why the MOTION TO COMPEL DISCOVERY filed herein by plaintiff should not be granted.

Signed this _____ day of May, 2017, at Baton Rouge, Louisiana.

TIMOTHY KELLEY
 Judge 19th Judicial District Court

JAMES J. DONELON, COMMISSIONER OF INSURANCE FOR THE STATE OF LOUISIANA, IN HIS CAPACITY AS REHABILITATOR OF LOUISIANA HEALTH COOPERATIVE, INC.

SUIT NO.: 651,069 SECTION: 22

versus

19TH JUDICIAL DISTRICT COURT

TERRY S. SHILLING, GEORGE G. CROMER, WARNER L. THOMAS, IV, WILLIAM A. OLIVER, CHARLES D. CALVI, PATRICK C. POWERS, CGI TECHNOLOGIES AND SOLUTIONS, INC., GROUP RESOURCES INCORPORATED, BEAM PARTNERS, LLC, MILLIMAN, INC., BUCK CONSULTANTS, LLC. AND TRAVELERS CASUALTY AND SURETY COMPANY OF AMERICA

STATE

APR 20 2017

BY CLERK OF COURT

PARISH OF EAST BATON ROUGE

STATE OF LOUISIANA

ORDER

On April 18, 2017, this Court held an in-person status conference to discuss the above-captioned case and set hearing dates for certain exceptions and motions. Present at the status conference were:

J.E. Cullens, Jr., counsel for James J. Donelon, Commissioner of Insurance for the State of Louisiana in his capacity as Rehabilitator of Louisiana Health Cooperative, Inc.

Matt J. Farley, counsel for Travelers Casualty and Surety Company of America

Robert B. Bieck, Jr., counsel for Warner L. Thomas IV and William A. Oliver

Robert J. David, Jr., counsel for George G. Cromer and Charles D. Calvi

Thomas M. McEachin, counsel for Terry Shilling

Henry D. H. Olinde, Jr., counsel for Patrick C. Powers

James A. Brown, counsel for Buck Consultants, LLC

V. Thomas Clark, Jr., counsel for Milliman, Inc.

Isaac H. Ryan, counsel for Beam Partners, LLC

W. Brett Mason, counsel for Group Resources, Inc.

Harry J. Phillips, Jr., counsel for CGI Technologies and Solutions, Inc.

IT IS HEREBY ORDERED, pursuant to the discussion and agreement of all counsel, that

the following dates apply to this case:

May 2, 2017—Specific Filing Deadlines (if necessary):

- Motion to Disqualify Jones Walker as Counsel for Warner Thomas and William Oliver
- Motion to Compel production by director and officer defendants of applicable insurance policies (other than Travelers)

EBR4001844

REC'D C.P.

EXHIBIT A

Handwritten initials

May 30, 2017, at 9:30 a.m.—Hearing:

- Exception of Lack of Subject Matter Jurisdiction filed by Milliman, Inc.
- Exception of Prematurity/Alternative Motion to Stay Proceedings filed by Beam Partners, LLC
- Exception of Improper Venue filed by Buck Consultant, LLC
- Motion to Disqualify Jones Walker as Counsel for Warner Thomas and William Oliver (if necessary)
- Motion regarding production of other applicable insurance policies (if necessary)

August 25, 2017, at 9:30 a.m.—Hearing:

- Exception of Prescription filed by Group Resources, Inc.
- Motion for Summary Judgment filed by CGI Technologies and Solutions, Inc.
- Exception of Prescription filed by Warner Thomas
- Exception of Prescription filed by Terry Shilling

September 25, 2017, at 9:30 a.m.—Hearing:

- Exceptions of No Right of Action, No Cause of Action, Vagueness and Ambiguity filed by Warner Thomas and William Oliver
- Exceptions of No Right of Action, No Cause of Action, Vagueness and Ambiguity filed by Patrick Powers
- Exceptions of No Right of Action, No Cause of Action, Vagueness and Ambiguity filed by Terry Shilling
- Exceptions of No Right of Action, No Cause of Action and Vagueness filed by George Cromer and Charles Calvi
- Exception of No Cause of Action filed by Travelers Casualty and Surety Company of America

IT IS FURTHER ORDERED that general discovery regarding the merits of this litigation is stayed absent further order of this Court; any discovery prior to September 25, 2017, is limited to specific issues involved in the Motion for Summary Judgment filed by CGI Technologies and Solutions, Inc., any exception of prescription set for hearing on August 25, 2017, and any motion filed regarding the production of applicable insurance policies.

Baton Rouge, Louisiana, this 26 day of April, 2017.

FILED
EAST BATON ROUGE PARISH, LA

2017 APR 26 AM 8:02

[Signature]
DEPUTY CLERK OF COURT

[Signature]

Timothy E. Kelley
Judge, 19th Judicial District Court

I HEREBY CERTIFY THAT ON THIS DAY A COPY OF THE WRITTEN REASONS FOR JUDGMENT (ORDER) WAS MAILED BY ME, WITH SUFFICIENT POSTAGE AFFIXED TO:

R. French
M. Arley
L. Bieda
R. Davis
D. Brown
H. G. G. Clark
W. B. Mason
R. Poirier
J. E. Cullis
T. McClary
T. Meacham
P. Bandoira
J. Marrow

4 28 17

2
[Signature]
DEPUTY CLERK OF COURT
M. Holden
A. Breckendige

RULE 9.5 CERTIFICATE

I certify that I first circulated this proposed Order to counsel for all parties via email on April 18, 2017, and that:

 no opposition was received; or
 X the following oppositions were received:

Attorney Rob Bieck, counsel for Warner Thomas and William Oliver, asserted the following objection / suggestion on April 20th: "Defendants Thomas and Oliver do not waive the five working days provided for in Rule 9.5 and therefore object to submission of the order to the court before the close of business on Tuesday, April 25, 2017." No other defense or plaintiff counsel joined or raised this objection; and

Attorney Rob Bieck, counsel for Warner Thomas and William Oliver, asserted the following objection / suggestion on April 20th: "It [our production of several insurance policies which may provide coverage herein] moots the discovery requests served on [defendants Thomas and Oliver] yesterday [April 19th], without waiving the objections that Messrs. Thomas and Oliver have to those requests. It also moots the need for the references to production by them in the draft scheduling order circulated Tuesday, April 18, 2017. Accordingly, we request that plaintiff withdraw the discovery propounded yesterday to Messrs. Thomas and Oliver and revise the scheduling order either to exclude them from the May 2, 2017 deadline to produce other policies or to indicate their compliance." No other defense or plaintiff counsel joined or raised this objection; and

Attorney Rob Bieck, counsel for Warner Thomas and William Oliver, asserted the following objection / suggestion on April 20th: "We also request that the order provide that oppositions to the motions and exceptions identified in it be due 14 days before the hearing on the motion or exception, instead of the eight days allowed by Rule 9.9(c) and that reply briefs be due seven days before the hearing." Attorney Thomas McEachin, counsel for Terry Shilling, joined this request on April 21st, and attorney Tom Clark, representing Milliman, Inc., joined this request on April 21st. No other defense or plaintiff counsel raised or joined this request;

I have allowed at least five (5) working days before presentation to the court.

Certified this 26th day of April, 2017.




J.E. Cullens, Jr.

CERTIFICATE OF SERVICE

I hereby certify that the foregoing has been sent to all counsel of record via email on this 26th day of April, 2017.



J.E. Cullens, Jr.

FILED
EAST BATON ROUGE PARISH, LOUISIANA
APR 26 AM 8:02

CLERK OF COURT

JAMES J. DONELON, COMMISSIONER :
OF INSURANCE FOR THE STATE OF :
LOUISIANA, IN HIS CAPACITY AS :
REHABILITATOR OF LOUISIANA :
HEALTH COOPERATIVE, INC. :

SUIT NO.: 651,069 SECTION: 22

versus :

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INCORPORATED, BEAM PARTNERS, :
LLC, MILLIMAN, INC., BUCK :
CONSULTANTS, LLC. AND :
TRAVELERS CASUALTY AND :
SURETY COMPANY OF AMERICA :

PARISH OF EAST BATON ROUGE

STATE OF LOUISIANA

**PLAINTIFF'S FIRST SET OF REQUESTS FOR ADMISSION, INTERROGATORIES,
AND REQUESTS FOR PRODUCTION OF DOCUMENTS
TO DEFENDANT, TERRY S. SHILLING**

NOW INTO COURT, through undersigned counsel, comes plaintiff, JAMES J. DONELON, COMMISSIONER OF INSURANCE FOR THE STATE OF LOUISIANA, IN HIS CAPACITY AS REHABILITATOR OF LOUISIANA HEALTH COOPERATIVE, INC., who propounds this First Set of Requests for Admission, Interrogatories, and Requests for Production of Documents to defendant, TERRY S. SHILLING to be answered in writing and under oath within fifteen (15) days of service hereof, in accordance with Louisiana Code of Civil Procedure Article 1457, *et seq.* These interrogatories are to be deemed continuing so as to require supplemental answers if additional information becomes available to defendants.

REQUEST FOR ADMISSION NO. 1:

Please admit or deny that the two policies issued by Travelers Casualty and Surety Company of America (bearing Policy No. 106227626 and Policy No. 106227532) are the only liability insurance policies, whether excess, umbrella or otherwise, which may insure You for liability for the damages alleged in plaintiff's First Supplemental, Amending and Restated Petition for Damages (the "Amended Petition").

INTERROGATORY NO. 1:

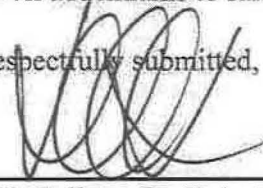
If Your response to Request for Admission No. 1 is anything other than an unqualified admission, for each and every policy(ies) of liability or other insurance which may insure You for the damages alleged in plaintiff's Amended Petition, please identify: (a) the name of the insurance company which issued any such policy(ies); (b) the type of coverage afforded by any such policy(ies); and (c) the policy limits of any such policy(ies).



REQUEST FOR PRODUCTION NO. 1:

If Your response to Request for Admission No. 1 is anything other than an unqualified admission, please provide a certified true copy of any and all policy(ies) of liability or other insurance which may insure You for the damages alleged in plaintiff's Amended Petition, including certificates, declarations, and any and all addendums to said policy(ies).

Respectfully submitted,



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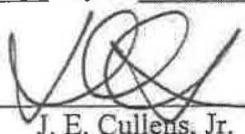
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Baton Rouge, Louisiana this 19 day of APRIL, 2017.



J. E. Cullens, Jr.

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PARISH OF EAST BATON ROUGE

STATE OF LOUISIANA

**PLAINTIFF'S FIRST SET OF REQUESTS FOR ADMISSION, INTERROGATORIES,
AND REQUESTS FOR PRODUCTION OF DOCUMENTS
TO DEFENDANT, GEORGE G. CROMER**

NOW INTO COURT, through undersigned counsel, comes plaintiff, JAMES J. DONELON, COMMISSIONER OF INSURANCE FOR THE STATE OF LOUISIANA, IN HIS CAPACITY AS REHABILITATOR OF LOUISIANA HEALTH COOPERATIVE, INC., who propounds this First Set of Requests for Admission, Interrogatories, and Requests for Production of Documents to defendant, GEORGE G. CROMER to be answered in writing and under oath within fifteen (15) days of service hereof, in accordance with Louisiana Code of Civil Procedure Article 1457, *et seq.* These interrogatories are to be deemed continuing so as to require supplemental answers if additional information becomes available to defendants.

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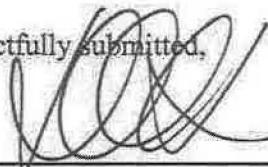
INTERROGATORY NO. 1:

If Your response to Request for Admission No. 1 is anything other than an unqualified admission, for each and every policy(ies) of liability or other insurance which may insure You for the damages alleged in plaintiff's Amended Petition, please identify: (a) the name of the insurance company which issued any such policy(ies); (b) the type of coverage afforded by any such policy(ies); and (c) the policy limits of any such policy(ies).

REQUEST FOR PRODUCTION NO. 1:

If Your response to Request for Admission No. 1 is anything other than an unqualified admission, please provide a certified true copy of any and all policy(ies) of liability or other insurance which may insure You for the damages alleged in plaintiff's Amended Petition, including certificates, declarations, and any and all addendums to said policy(ies).

Respectfully submitted,



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Baton Rouge, Louisiana this 19th day of APRIL, 2017.



J. E. Cullens, Jr.

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TERRY S. SHILLING, GEORGE G. CROMER, WARNER L. THOMAS, IV, WILLIAM A. OLIVER, CHARLES D. CALVI, PATRICK C. POWERS, CGI TECHNOLOGIES AND SOLUTIONS, INC., GROUP RESOURCES INCORPORATED, BEAM PARTNERS, LLC, MILLIMAN, INC., BUCK CONSULTANTS, LLC. AND TRAVELERS CASUALTY AND SURETY COMPANY OF AMERICA	:	PARISH OF EAST BATON ROUGE
	:	
	:	STATE OF LOUISIANA

**PLAINTIFF'S FIRST SET OF REQUESTS FOR ADMISSION, INTERROGATORIES,
AND REQUESTS FOR PRODUCTION OF DOCUMENTS
TO DEFENDANT, WARNER L THOMAS, IV**

NOW INTO COURT, through undersigned counsel, comes plaintiff, JAMES J. DONELON, COMMISSIONER OF INSURANCE FOR THE STATE OF LOUISIANA, IN HIS CAPACITY AS REHABILITATOR OF LOUISIANA HEALTH COOPERATIVE, INC., who propounds this First Set of Requests for Admission, Interrogatories, and Requests for Production of Documents to defendant, WARNER L. THOMAS, IV to be answered in writing and under oath within fifteen (15) days of service hereof, in accordance with Louisiana Code of Civil Procedure Article 1457, *et seq.* These interrogatories are to be deemed continuing so as to require supplemental answers if additional information becomes available to defendants.

REQUEST FOR ADMISSION NO. 1:

Please admit or deny that the two policies issued by Travelers Casualty and Surety Company of America (bearing Policy No. 106227626 and Policy No. 106227532) are the only liability insurance policies, whether excess, umbrella or otherwise, which may insure You for liability for the damages alleged in plaintiff's First Supplemental, Amending and Restated Petition for Damages (the "Amended Petition").

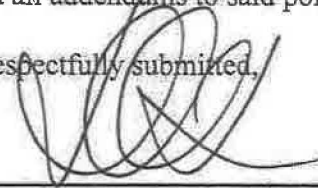
INTERROGATORY NO. 1:

If Your response to Request for Admission No. 1 is anything other than an unqualified admission, for each and every policy(ies) of liability or other insurance which may insure You for the damages alleged in plaintiff's Amended Petition, please identify: (a) the name of the insurance company which issued any such policy(ies); (b) the type of coverage afforded by any such policy(ies); and (c) the policy limits of any such policy(ies).

REQUEST FOR PRODUCTION NO. 1:

If Your response to Request for Admission No. 1 is anything other than an unqualified admission, please provide a certified true copy of any and all policy(ies) of liability or other insurance which may insure You for the damages alleged in plaintiff's Amended Petition, including certificates, declarations, and any and all addendums to said policy(ies).

Respectfully submitted,



J. E. Cullens, Jr., T.A., La. Bar #23011
Edward J. Walters, Jr., La. Bar #13214
Darrel J. Papillion, La. Bar #23243
David Abboud Thomas, La. Bar #22701
Jennifer Wise Moroux, La. Bar #31368
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Baton Rouge, LA 70810
Phone: (225) 236-3636
Facsimile: (225) 236-3650

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing has been furnished via U.S. Mail, postage prepaid, and via e-mail to all counsel of record as follows:

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Taylor Porter
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Matt J. Farley
Krebs Farley
400 Poydras Street, #2500
New Orleans, LA 70130

Baton Rouge, Louisiana this 19th day of APRIL, 2017.



J. E. Cullens, Jr.

JAMES J. DONELON, COMMISSIONER
OF INSURANCE FOR THE STATE OF
LOUISIANA, IN HIS CAPACITY AS
REHABILITATOR OF LOUISIANA
HEALTH COOPERATIVE, INC.

SUIT NO.: 651,069 SECTION: 22

versus

19TH JUDICIAL DISTRICT COURT

TERRY S. SHILLING, GEORGE G.
CROMER, WARNER L. THOMAS, IV,
WILLIAM A. OLIVER, CHARLES D.
CALVI, PATRICK C. POWERS, CGI
TECHNOLOGIES AND SOLUTIONS,
INC., GROUP RESOURCES
INCORPORATED, BEAM PARTNERS,
LLC, MILLIMAN, INC., BUCK
CONSULTANTS, LLC. AND
TRAVELERS CASUALTY AND
SURETY COMPANY OF AMERICA

PARISH OF EAST BATON ROUGE

STATE OF LOUISIANA

**PLAINTIFF'S FIRST SET OF REQUESTS FOR ADMISSION, INTERROGATORIES,
AND REQUESTS FOR PRODUCTION OF DOCUMENTS
TO DEFENDANT, WILLIAM A. OLIVER**

NOW INTO COURT, through undersigned counsel, comes plaintiff, JAMES J. DONELON, COMMISSIONER OF INSURANCE FOR THE STATE OF LOUISIANA, IN HIS CAPACITY AS REHABILITATOR OF LOUISIANA HEALTH COOPERATIVE, INC., who propounds this First Set of Requests for Admission, Interrogatories, and Requests for Production of Documents to defendant, WILLIAM A. OLIVER to be answered in writing and under oath within fifteen (15) days of service hereof, in accordance with Louisiana Code of Civil Procedure Article 1457, *et seq.* These interrogatories are to be deemed continuing so as to require supplemental answers if additional information becomes available to defendants.

REQUEST FOR ADMISSION NO. 1:

Please admit or deny that the two policies issued by Travelers Casualty and Surety Company of America (bearing Policy No. 106227626 and Policy No. 106227532) are the only liability insurance policies, whether excess, umbrella or otherwise, which may insure You for liability for the damages alleged in plaintiff's First Supplemental, Amending and Restated Petition for Damages (the "Amended Petition").

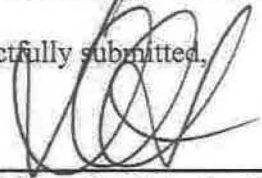
INTERROGATORY NO. 1:

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Respectfully submitted,



J. E. Cullens, Jr., T.A., La. Bar #23011
Edward J. Walters, Jr., La. Bar #13214
Darrel J. Papillion, La. Bar #23243
David Abboud Thomas, La. Bar #22701
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Baton Rouge, Louisiana this 19th day of APRIL, 2017.



J. E. Cullens, Jr.

JAMES J. DONELON, COMMISSIONER OF INSURANCE FOR THE STATE OF LOUISIANA, IN HIS CAPACITY AS REHABILITATOR OF LOUISIANA HEALTH COOPERATIVE, INC.	:	SUIT NO.: 651,069 SECTION: 22
	:	
versus	:	19 TH JUDICIAL DISTRICT COURT
	:	
TERRY S. SHILLING, GEORGE G. CROMER, WARNER L. THOMAS, IV, WILLIAM A. OLIVER, CHARLES D. CALVI, PATRICK C. POWERS, CGI TECHNOLOGIES AND SOLUTIONS, INC., GROUP RESOURCES INCORPORATED, BEAM PARTNERS, LLC, MILLIMAN, INC., BUCK CONSULTANTS, LLC. AND TRAVELERS CASUALTY AND SURETY COMPANY OF AMERICA	:	PARISH OF EAST BATON ROUGE
	:	
	:	STATE OF LOUISIANA

**PLAINTIFF'S FIRST SET OF REQUESTS FOR ADMISSION, INTERROGATORIES,
AND REQUESTS FOR PRODUCTION OF DOCUMENTS
TO DEFENDANT, CHARLES D. CALVI**

NOW INTO COURT, through undersigned counsel, comes plaintiff, JAMES J. DONELON, COMMISSIONER OF INSURANCE FOR THE STATE OF LOUISIANA, IN HIS CAPACITY AS REHABILITATOR OF LOUISIANA HEALTH COOPERATIVE, INC., who propounds this First Set of Requests for Admission, Interrogatories, and Requests for Production of Documents to defendant, CHARLES D. CALVI to be answered in writing and under oath within fifteen (15) days of service hereof, in accordance with Louisiana Code of Civil Procedure Article 1457, *et seq.* These interrogatories are to be deemed continuing so as to require supplemental answers if additional information becomes available to defendants.

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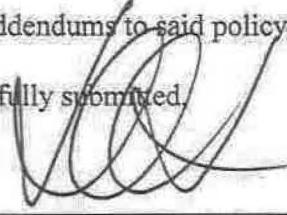
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J. E. Cullens, Jr.

JAMES J. DONELON, COMMISSIONER OF INSURANCE FOR THE STATE OF LOUISIANA, IN HIS CAPACITY AS REHABILITATOR OF LOUISIANA HEALTH COOPERATIVE, INC.	:	SUIT NO.: 651,069 SECTION: 22
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TERRY S. SHILLING, GEORGE G. CROMER, WARNER L. THOMAS, IV, WILLIAM A. OLIVER, CHARLES D. CALVI, PATRICK C. POWERS, CGI TECHNOLOGIES AND SOLUTIONS, INC., GROUP RESOURCES INCORPORATED, BEAM PARTNERS, LLC, MILLIMAN, INC., BUCK CONSULTANTS, LLC. AND TRAVELERS CASUALTY AND SURETY COMPANY OF AMERICA	:	PARISH OF EAST BATON ROUGE
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**PLAINTIFF'S FIRST SET OF REQUESTS FOR ADMISSION, INTERROGATORIES,
AND REQUESTS FOR PRODUCTION OF DOCUMENTS
TO DEFENDANT, PATRICK C. POWERS**

NOW INTO COURT, through undersigned counsel, comes plaintiff, JAMES J. DONELON, COMMISSIONER OF INSURANCE FOR THE STATE OF LOUISIANA, IN HIS CAPACITY AS REHABILITATOR OF LOUISIANA HEALTH COOPERATIVE, INC., who propounds this First Set of Requests for Admission, Interrogatories, and Requests for Production of Documents to defendant, PATRICK C. POWERS to be answered in writing and under oath within fifteen (15) days of service hereof, in accordance with Louisiana Code of Civil Procedure Article 1457, *et seq.* These interrogatories are to be deemed continuing so as to require supplemental answers if additional information becomes available to defendants.

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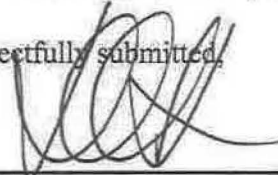
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