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

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**PLAINTIFF’S OPPOSITION TO GRI’S MOTION TO COMPEL**

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MAY IT PLEASE THE COURT:

Plaintiff, the Receiver for the failed Louisiana HMO, Louisiana Health Cooperative, Inc. (“LAHC”), respectfully opposes the Motion to Compel filed herein by Group Resources Incorporated, Inc. (“GRI”). GRI’s motion is currently set for Zoom hearing on June 29, 2020, at 1:30 p.m.

**Introduction**

Unfortunately, GRI’s discovery motion is long on vitriol, but very short on facts. Although it is clear that the purpose of GRI’s motion is to portray itself as the “victim” here and to cast the Receiver and undersigned counsel in a bad light, once the accurate history and facts surrounding this discovery dispute are revealed, it is GRI and its counsel that appear to be more interested in gamesmanship than working in a reasonable and professional way to resolve this dispute that was caused, in large part, to GRI’s gross incompetence.

**GRI refused to Share Costs and Coordinate ESI Discovery**

Recognizing that this case involves a large volume of Electronically Stored Information (“ESI”), the Receiver diligently tried to coordinate a mutually acceptable mechanism with all Defendants that would allow all parties, *inter alia*, to (1) use the same, third-party vendor to store and manage all ESI; (2) to cooperate and jointly agree upon the search terms / parameters to be used to identify relevant information and, in essence, limit the size of the ESI at hand; and (3) share costs accordingly.

For more than two (2) months (from mid-September 2017 through mid-November 2017), the Receiver and all Defendants worked together to reach consensus that all parties would select, use, and share the costs of a single, agreed-upon outside vendor to handle the production / management of electronic discovery in this case. Exhibit A is an *in globo* collection of emails between all counsel that evidences this concerted effort. Following the first telephone conference of September 19, 2020, and as confirmed by email, “It was the general consensus that we try to agree upon and use a mutually acceptable protocol to manage ESI discovery.” Exhibit A, email of September 20, 2020. For the next two (2) months, all counsel participated in at least six (6) telephone conferences,<sup>1</sup> identified several potential, third-party vendors,<sup>2</sup> and began drafting mutually acceptable search terms / protocols that would generate a more workable, subset of ESI data for everyone involved. Working together in such a coordinated, orderly manner is undoubtedly the most reasonable, effective, and economical way to proceed in complex cases like the immediate one that involves multiple parties, multiple sources of data, and voluminous ESI. If all parties do not agree to work together and share costs associated with this ESI effort, each party is left to bear the burden and costs associated with ESI searches and management on its own—not the wisest, most efficient, or most economical route to take.

Ironically, it was GRI who—after wasting more than two (2) months of everyone’s time and effort—objected to a common, coordinated approach to ESI in this case. At the last telephone conference of November 14, 2017, regarding this ESI effort, counsel for GRI informed the entire group that it was no longer interested in participating in this common effort to manage ESI. In effect, GRI decided to force the Receiver and every defendant to undertake ESI production and management on its own. For GRI to now—more than 2 and ½ years later—complain to this Honorable Court about the “significant” expense associated with ESI when, in fact, GRI caused the problem it now complains about because of its refusal to cooperate with everyone to avoid it, undercuts GRI’s entire complaint. Indeed, it is very telling that GRI conveniently avoids any mention of this history in its current motion. Moreover, as is shown below, that GRI is now objecting to the form of the ESI that it produced to the Receiver in the first place is almost comical, if it were not so shocking.

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<sup>1</sup> As shown in Exhibit A, all counsel conferred on at least the following dates to discuss the management of ESI: (1) 9/9/17; (2) 10/2/17; (3) 10/5/17; (4) 10/19/17; (5) 11/8/17; and (6) 11/14/17.

<sup>2</sup> As shown in Exhibit A, the list of potential, third-party vendors included Docusource (suggested by Buck) and Nextpoint (suggested by Milliman). The Receiver also suggested Cicayda, the third-party vendor that plaintiff is currently using.

### **GRI is Objecting to the TIFF format of documents that GRI Produced to the Receiver**

Amazingly, GRI accuses the Receiver of deceptive discovery practices that have no basis in fact, and in so doing, reveals counsel for GRI's fundamental confusion regarding the TIFF data produced by the Receiver. GRI falsely accuses the Receiver of "convert[ing] the vast majority of documents GRI has loaded from native format to Tag Image File Format ("TIFF") before dumping those documents on GRI." GRI's memo, p. 9.<sup>3</sup> In fact, all of these "unusable" TIFF files were produced by GRI to the Receiver in 2016 before this suit was filed. The Receiver did not convert a single file to TIFF before producing this ESI to all defendants. Instead, the Receiver produced the very same TIFF data that GRI gave to the Receiver when he took custody of these files from GRI prior to filing this suit. If this TIFF data is so worthless and unusable, as GRI now complains, GRI has no one to blame for this problematic data than itself.

To be clear, the Receiver is not accusing GRI of "converting" native files to TIFF format as a means of frustrating discovery efforts in this case. Rather, the Receiver is pointing out to counsel for GRI and this Honorable Court that GRI maintained and used TIFF data as the TPA of LAHC. As the TPA of LAHC responsible for running the HMO, GRI used an older and outdated software system which utilized native TIFF documents to manage LAHC's claims and other data. In contrast, GRI's competitor, CGI (LAHC's prior TPA who has already settled plaintiff's claims against it) used a better, modern system that stored claim images in a more usable, searchable, and updated PDF format. When the Receiver terminated the services of GRI and took custody of GRI's servers, they contained the very same TIFF data that GRI now wrongly accuses the Receiver of "converting" to make discovery more difficult for everyone. The "additional burden ... to convert millions of TIFF files into searchable text files" (memo, p. 3) that counsel for GRI erroneously claims was caused by something the Receiver did, has actually been caused by GRI's use of an outdated software system that relied upon and used problematic TIFF files.

The Receiver will give the benefit of the doubt to counsel for GRI, as he was probably not personally involved with or responsible for coordinating GRI's production of these TIFF documents to the Receiver; however, before falsely accusing the Receiver of nefariously "converting" the format of native documents, counsel for GRI should have bothered to learn that his client, GRI, is the party responsible for producing these TIFF documents to the Receiver. The Receiver, in keeping with his discovery obligations, has simply produced all of these TIFF

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<sup>3</sup> See also, GRI's memo, pp. 2-3.

documents just as they were given to him by GRI. There is no nefarious or inappropriate effort to prejudice GRI afoot here, and the Receiver will try his best to excuse GRI's baseless and offensive accusation.

As discussed in more detail below, because the cost of converting documents to a more "usable" format is the same for the Receiver as it is for GRI (or any other party for that matter), there is no reason or legal basis for the Receiver to bear all of the costs associated with any such conversion. Indeed, if any single party should be primarily, if not exclusively, responsible for paying for this conversion, it would be GRI, as it is the party responsible for using and producing unsearchable data in the first place.

**LAHC's electronic data production substantially comports with La. C.C.P. art 1462**

GRI incorrectly suggests that LAHC must produce the documents in a reasonably usable format and identify by Bates number which documents are responsive to each request. Applicable discovery rules simply do not mandate that LAHC do this.

**A. Rules applicable to production ESI**

A party who produces documents for inspection **shall produce them as they are kept in the usual course of business or** shall organize and label them to correspond with the categories of the request. If a request does not specify the form or forms for producing information, including electronically stored information, a responding party **shall produce the information in a form or forms in which it is ordinarily maintained or** in a form or forms that are reasonably usable. When electronically stored information is produced, the responding party shall identify the specific means for electronically accessing the information.

La. C.C.P. art. 1462(C)(emphasis added).

A party need not provide discovery of electronically stored information from sources that the party identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the party from whom discovery is sought shall show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause. The court may specify conditions for the discovery considering the criteria and limitations of Article 1426.

La. C.C.P. art. 1462(B)(3). "Unless otherwise ordered by the court, a party need not produce the same information, including electronically stored information, in more than one form." La. C.C.P. art. 1462(D).

LAHC produced the documents as they were kept by GRI and/or LAHC in the usual course of business and in the form or forms in which it was ordinarily maintained. LAHC is not required to produce ESI in a reasonably useable form, categorized and labelled to respond to the discovery requests. GRI is aware that this is an option that can be ignored, because GRI itself (and Milliman

and Buck) responded to LAHC’s discovery without producing ESI in a reasonably useable form, categorized and labelled to respond to LAHC’s discovery requests.

**GRI asks LAHC to make its ESI production readily usable when neither GRI nor Milliman made their ESI responses to LAHC discovery searchable either**

Each party in this case, including GRI and Milliman, chose to produce their responsive documents without organizing and labelling the documents to correspond with the categories of the request and without making them searchable. The chart on the following page compares the production of each of GRI, Milliman, Buck and LAHC. It plainly reflects that GRI, Buck, and Milliman dumped their documents onto LAHC without any discernable organization or categorization related to LAHC’s requests.

The first row of the chart reflects the number of bates-numbered documents produced.

The second row of the chart reflects the method of organization used by the party.

The third row shows the subfolder organization used by the party.

The fourth and fifth rows shows exemplars of the actual documents as they were produced. This chart shows that each party produced data in generally the same native, image, text categorization without any attempt to identify any document as responsive to any request. GRI complains that LAHC produced documents the same way that it did.<sup>4</sup> This is the height of hypocrisy.

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<sup>4</sup> On June 2, 2020, GRI supplemented its original production of documents by producing and referring to “GRI 00000001-00053410 and GRJ00069810-00347610” in the same format as its original production.

| GRI Production   | Milliman Production   | Buck Production   | LAHC Production  |
|--|---|---|--|
| 00000001-00069643  | 00000001-00005040   | 0000001-0028644   | 00000001-03480679  |
| Name <ul style="list-style-type: none"> <li>DUPLICATE</li> <li>GRI Prod</li> <li>Prod C</li> <li>Prod E</li> <li>Prod F</li> <li>Prod G</li> <li>Prod H</li> <li>Prod I</li> <li>Prod J</li> <li>Prod K</li> <li>Prod L</li> <li>Document Count</li> <li>ftp site instructions</li> <li>GRI Response to INT and RFI</li> <li>GRI_Production</li> <li>Instructions for Downloadin</li> <li>Privilege log</li> </ul> | Name <ul style="list-style-type: none"> <li>DATA</li> <li>IMAGES</li> <li>NATIVES</li> <li>TEXT</li> <li>20180202 - JEC - Clark</li> <li>Milliman Response to INT fro</li> <li>Milliman Response to RFP fro</li> <li>Password to Download</li> </ul>  | Name <ul style="list-style-type: none"> <li>IMAGES</li> <li>NATIVES</li> <li>Prod 1</li> <li>Prod 2</li> <li>Prod 3</li> <li>TEXT</li> <li>Buck Privilege Log - Produced</li> <li>Buck's Response to INT and RFI</li> <li>WR514430_LAHC_-_Production</li> <li>WR514430_LAHC_-_Production</li> </ul>                               | Name <ul style="list-style-type: none"> <li>CMS FOIA</li> <li>Jones Walker File</li> <li>LAHC_E_PRODUCTION-2018</li> <li>LAHC_HD1_PRODUCTION-2018</li> <li>production</li> <li>LAHC_E_PRODUCTION-2018</li> <li>LAHC_HD1_PRODUCTION-2018</li> </ul>                             |
| Name <ul style="list-style-type: none"> <li>CONFIDENTIAL</li> <li>CONFIDENTIAL - PHI</li> <li>DATA</li> <li>IMAGES</li> <li>NATIVE</li> </ul>  | Name <ul style="list-style-type: none"> <li>IMG001</li> <li>IMG002</li> <li>IMG003</li> <li>IMG004</li> <li>IMG005</li> <li>IMG006</li> <li>IMG007</li> <li>IMG008</li> </ul>   | Name <ul style="list-style-type: none"> <li>IMAGES</li> <li>NATIVES</li> <li>TEXT</li> </ul>  | Name <ul style="list-style-type: none"> <li>NATIVES</li> <li>PDF</li> <li>production</li> <li>production.lfp</li> <li>production.opt</li> </ul>  |
| Name <ul style="list-style-type: none"> <li>000</li> <li>001</li> <li>002</li> <li>003</li> <li>004</li> <li>005</li> <li>006</li> </ul>   | Name <ul style="list-style-type: none"> <li>Combined</li> <li>MILLIMAN_LA00000001</li> <li>MILLIMAN_LA00000002</li> <li>MILLIMAN_LA00000003</li> <li>MILLIMAN_LA00000004</li> <li>MILLIMAN_LA00000005</li> <li>MILLIMAN_LA00000006</li> <li>MILLIMAN_LA00000007</li> <li>MILLIMAN_LA00000008</li> <li>MILLIMAN_LA00000009</li> <li>MILLIMAN_LA00000010</li> </ul> | Name <ul style="list-style-type: none"> <li>A - Combined 1</li> <li>BUCK0000449</li> <li>BUCK0000450</li> <li>BUCK0000451</li> <li>BUCK0000452</li> <li>BUCK0000453</li> <li>BUCK0000454</li> <li>BUCK0000455</li> <li>BUCK0000456</li> <li>BUCK0000457</li> <li>BUCK0000458</li> <li>BUCK0000459</li> <li>BUCK0000460</li> </ul> | Name <ul style="list-style-type: none"> <li>000002</li> <li>000003</li> <li>000004</li> <li>000005</li> <li>000006</li> <li>000007</li> <li>000008</li> <li>000009</li> <li>000010</li> <li>000011</li> <li>000012</li> <li>000013</li> <li>000014</li> </ul>                  |
| <ul style="list-style-type: none"> <li>Combined</li> <li>GRI 00058412</li> <li>GRI 00058416</li> <li>GRI 00058419</li> <li>GRI 00058427</li> <li>GRI 00058429</li> <li>GRI 00058432</li> <li>GRI 00058435</li> <li>GRI 00058438</li> </ul>   |   |   | Name <ul style="list-style-type: none"> <li>LAHC_E_00003027</li> <li>LAHC_E_00003030</li> <li>LAHC_E_00003032</li> <li>LAHC_E_00003706</li> <li>LAHC_E_00004869</li> <li>LAHC_E_00004870</li> <li>LAHC_E_00005350</li> <li>LAHC_E_00005433</li> <li>LAHC_E_00005484</li> </ul> |

GRI complains that LAHC did not produce documents in a readily usable (searchable) format. Neither did they. OCR is an acronym for “Optical Character Recognition.” Many people are surprised to learn that a scanned image in its native state cannot be searched. OCR technology is what makes the image searchable. To make documents produced by any party searchable requires someone to electronically convert images of typed, handwritten or printed text into machine-encoded text. GRI, Milliman and Buck all produced their documents without having them “OCR’d” yet GRI complains to this Honorable Court that LAHC did the same thing. This is an amazing position coming from the defendant who refused to participate in LAHC’s effort to make the ESI readily usable by having everything OCR’d.

Significantly, GRI has had, or should have had, prior to this lawsuit, substantially all of the ESI data produced by LAHC in response to discovery. As the Third-Party Administrator (“TPA”), GRI kept all of LAHC’s ESI on servers named “Frank” and “Edith” at its Duluth Georgia office. That was not, however, the only location on which GRI stored LAHC ESI. They also backed the information up daily to a different location. In May 2016, the Receiver took possession of the server named “Frank” and moved it to Baton Rouge. The Receiver has not, however, taken the server named “Edith” or any of the backups. GRI’s complaint’s that it does not have access to LAHC’s ESI is factually inaccurate and completely misleading.

There is another reason why GRI’s complaint about the accessibility of LAHC ESI is disingenuous. While acting as LAHC’s TPA, GRI controlled LAHC’s ESI, not just physically, but also conceptually, including deciding whether this information was stored in a searchable format, or not. GRI used the antiquated EHP system, which stored data in unsearchable TIFF documents. Nor did GRI OCR any other documents stored on the Frank server. Thus, LAHC was not able to do a word search to find information to respond to GRI’s requests, just like when LAHC still operated, it could not do a word search of the EHP system to address issues related to member claims. GRI made the decision to use TIFF data, not the Receiver.

**LAHC requests that this Honorable Court impose cost-sharing conditions under Article 1462(B) to make the ESI searchable.**

GRI represented in its Motion to Compel:

In addition to imposing an unreasonably cumbersome document-review burden on GRI, Plaintiffs production also imposes a significant cost burdens. For example, vendor estimates to host the data on a monthly basis range from \$15 per gigabyte to \$40 per gigabyte, equating to \$75,000 to \$200,000 in hosting charges per month. Vendors also require one-time loading and processing charges, estimates of which have ranged from \$100,000 to \$200,000. To date,

GRI has only loaded a small portion of Plaintiffs production in an attempt to assess the document production before incurring additional charges.

Memo, p. 3. LAHC suggests that this argument also is the very reason why LAHC attempted to coordinate a shared system and searches for relevant ESI. Federal courts already by rule recognize that the costs of producing ESI should be proportional to the needs of the case. In turn, Rule 26(b)(2) imposes general limitations on the scope of discovery in the form of a “proportionality test”:

Parties may obtain discovery regarding any nonprivileged matter that is relevant to any party's claim or defense and proportional to the needs of the case, considering the importance of the issues at stake in the action, the amount in controversy, the parties' relative access to relevant information, the parties' resources, the importance of the discovery in resolving the issues, and whether the burden or expense of the proposed discovery outweighs its likely benefit. Information within this scope of discovery need not be admissible in evidence to be discoverable.

Fed. R. Civ. P. 26(B)(1). LAHC asserts that the expense of the proposed discovery outweighs its likely benefit, which GRI now appears to have recognized. Given that GRI failed to store much of this information in a searchable manner in the first place and refused to participate in a voluntary cost sharing proposal when this case began, LAHC respectfully request that this Honorable Court impose on GRI, rather than LAHC, the cost of making the ESI searchable.

As recognized by the third circuit in *State v. Louisiana Land & Expl. Co.*, the goal of discovery is to “encourage forms of production that would facilitate the orderly, efficient, and cost effective production of ESI and which allow the requesting party to meaningfully analyze, search, and display the produced electronic data.” 2017-755 (La. App. 3 Cir. 12/20/17), 258 So. 3d 790, 799, citing *The Sedona Conference, The Sedona Principles, Third Edition: Best Practices, Recommendations & Principles for Addressing Electronic Document Production*, 88–90, 2017.

**GRI ignores the history leading to this dispute and misstates important facts**

GRI's refusal to cooperate with the Receiver and other defendants in selecting a common ESI vendor and developing mutually acceptable search protocols, has essentially forced each party, including the Receiver, to hire its own ESI manager and perform its own searches, etc. Rather than participate in a common enterprise that would have been much more efficient and economical, GRI has effectively created the problem it now complains about to this Honorable Court. Moreover—and importantly—by forcing each party to hire its own vendor and manage ESI



individually, each party has incurred significant expenses to compile, produce, and search all ESI on its own.<sup>5</sup>

GRI misstates, either deliberately or negligently, many facts regarding the Receiver's production of ESI and the history leading up to it. First, GRI greatly exaggerates the amount of data produced. The Receiver produced approximately 1.3 million files, not "seven million documents" as erroneously asserted by GRI. Second, the Receiver did in fact bates-number each page of every document produced by LAHC; the "unusable" TIFF data obtained from GRI is not individually bates-numbered, as this effort—as recognized by GRI—would be very onerous and expensive to undertake. But surely, if anyone is obligated to bates-number each of these TIFF documents, then GRI should be forced to bear this expense regarding its own data—not the Receiver.

Tellingly, GRI does not inform this Honorable Court that the Receiver, at the time of its production of ESI to all defendants back in February 2018, produced an itemization that identified: (a) the type of Folder / File being produced; (b) the source and description of that Folder / File; (c) the approximate size of that Folder / File; (d) the bates-number ranges associated with each Folder / File; and (d) the necessary access / password instructions to access each Folder / File. Attached hereto as Exhibit B is a copy of this itemization that GRI did not attach to its motion.

With the exception of the internal LAHC documents and emails produced by the Receiver (about which GRI does not really complain), the vast majority of the data produced by the Receiver to all parties more than (2) years ago consists of data, in its native format, that the Receiver obtained from GRI.

As a practical matter, most, if not all of the TIFF data that GRI has produced relates to specific "claim files" relating to LAHC policyholders and covered health care providers. Although these "claim files" are certainly relevant, discoverable information that the Receiver produced to all defendants more than two (2) years ago, whether and to what extent GRI or any other party must necessarily convert these voluminous files to a more searchable format for litigation purposes is certainly debatable. The primary evidence supporting the Receiver's claims against GRI and GRI's position that it was not negligent, will probably not be gleaned from any detailed search of these "claim files." If, however, a party or this Honorable Court deems it necessary for these millions of files to be converted to a more searchable format, GRI should be ordered to pay this

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<sup>5</sup> The Receiver has, to date, incurred well over \$100,000 regarding ESI management alone.

considerable expense for everyone's sake. Under no circumstance, however, should the Receiver—or any other party for that matter—be forced to pay to convert GRI's native files into a more usable format.

As is laid bare by GRI's motion, GRI has not yet bothered to load and review its own data it produced to the Receiver.<sup>6</sup> In effect, by wrongly portraying itself as the helpless "victim" of some diabolical scheme (which it has fabricated), GRI hopes to somehow shift the financial burden of converting these TIFF files into a more usable format to the Receiver. Just consider the perversity of GRI's position. GRI maintained claims data in TIFF native format because GRI used an outdated system to run LAHC. GRI gave the Receiver these TIFF documents just as GRI maintained them. GRI refused to cooperate with the Receiver and other defendants to select and use a third-party vendor to manage this ESI. And when the Receiver essentially gives back GRI's own TIFF data, GRI wrongly accuses the Receiver of "converting" this data and demands that the Receiver pay to make its own useless data more usable. Whether GRI and/or its counsel should be sanctioned for this farce is left to the sound discretion of this Honorable Court.

#### **PHI Data**

Once again, counsel for GRI, tries to mislead this Honorable Court by wrongly accusing the Receiver of "foul play" by allegedly failing "to mark documents containing PHI" appropriately. Memo, p. 3 & 10. At considerable expense, the Receiver has identified and marked at least 1.2 million documents as "CONFIDENTIAL PHI" pursuant to the Protective Order. Pursuant to the Protective Order (see Exhibit 3 to GRI's motion, Sec. 6, p. 5), if a document is not originally marked as "CONFIDENTIAL PHI" when produced, the producing party may later designate the document as such. Regardless of whether a document that contains obvious PHI is not marked as "CONFIDENTIAL PHI," every party and counsel to this proceeding is obligated—whatever designation that document may or may not have—not to disclose PHI to a third-party. This case involves the failure of a health insurance company; it necessarily follows that many documents and related data produced in this case will contain PHI. Absent marking every document "CONFIDENTIAL PHI," the Receiver may not have originally identified and mark each and every document containing PHI with this designation, despite his counsel's good faith effort to do so. GRI's immediate complaint is nothing more than a "Gotcha!" aimed at the Receiver.

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<sup>6</sup> "To date," writes GRI's counsel, "GRI has only loaded a small portion of Plaintiff's production in an attempt to assess the document production before incurring additional charges." Memo, p. 3.

## Conclusion

There is absolutely no basis for GRI's feigned outrage. If GRI has anyone to blame for its frustration, it is itself. By deliberately choosing not to cooperate with the Receiver and all Defendants to share a common ESI strategy, by producing TIFF files that are "unusable" (using GRI's own words), and by choosing to involve the Court in such discovery disputes rather than working such issues out extrajudicially, GRI "doth protest too much, methinks." If anyone deserves to be sanctioned in the form of attorneys' fees and expenses related to this discovery dispute, it is GRI and certainly not the Receiver. For all of the foregoing reasons, the Receiver respectfully requests that GRI's Motion to Compel be DENIED and that if any party is ordered to bear the expense of converting any of this native data into a more "usable" format, it is GRI that should bear this cost—not the Receiver.

Respectfully submitted,



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**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing has been furnished via e-mail to all counsel of record as follows, this 19<sup>th</sup> day of June, 2020, in Baton Rouge, Louisiana.

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J. E. Cullens, Jr.

## J. Cullens

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**From:** J. E. Cullens, Jr.  
**Sent:** Wednesday, September 13, 2017 3:46 PM  
**To:** Brown, James A. (jabrown@liskow.com); Grant J. Guillot; J. E. Cullens, Jr.; Jennifer Wise Moroux; Le Clercq, F. Theodore (ted@deutschkerrigan.com); Michael W. McKay - Stone Pigman Walther Wittmann LLC (mmckay@stonepigman.com); Patti O. Sollie; Philips, Harry J., Jr. (skip.philips@taylorporter.com); ryan.french@taylorporter.com; V. Thomas Clark - Adams and Reese, LLP (tom.clark@arlaw.com); W. Brett Mason - Stone Pigman Walther Wittmann L.L.C. (bmason@stonepigman.com)  
**Cc:** Patti O. Sollie  
**Subject:** LAHC--CMO / DISCOVERY +

As I have not heard from some of you regarding the last draft of the JUDGMENT circulated last week, please be advised that we plan to file the same with the Court on Friday, September 15<sup>th</sup>. If you have any objections to the same, please make sure you email me and my assistant, Patti Sollie (cc'd above), before the close of business tomorrow (9/14), as I will be out-of-the-office until Monday, September 18<sup>th</sup>.

Pursuant to the proposed Judgment, we are expected to confer and, if possible, agree upon a mutually acceptable Case Scheduling Order.

I suggest we have a telephone conference one day next week to discuss such a CMO. Can everyone participate in such a telephone conference on:

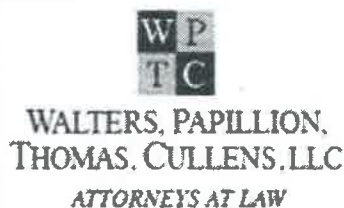
**TUESDAY, 9/19 at 3:00 PM**

If so, please let us know and we will circulate a call-in number. If you are not available at this time, please let us know and circulate alternative times for such a call.

One of the main issues I would like to discuss during our call is how best to handle the voluminous amount of electronic data relating to LAHC. Please consider whether your respective client would be willing to share and work with an acceptable third-party vendor to facilitate the management and production of this electronic data, or not. Of course, we can and will discuss in detail during our call next week.

I look forward to hearing from you and working with you to resolve this dispute. And, as always, please call or email me with any questions or concerns.

J.Cullens



**J. E. Cullens, Jr.**  
12345 Perkins Road, Building 1  
Baton Rouge, LA 70810  
ph 225.236.3636  
fax 225.236.3650  
[cullens@lawbr.net](mailto:cullens@lawbr.net)  
[www.lawbr.net](http://www.lawbr.net)



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## J. Cullens

---

**From:** Grant J. Guillot <Grant.Guillot@arlaw.com>  
**Sent:** Wednesday, September 20, 2017 9:16 AM  
**To:** James A Brown; 'Le Clercq, F. Theodore (ted@deutschkerrigan.com)'; 'Michael W. McKay - Stone Pigman Walther Wittmann LLC (mmckay@stonepigman.com)'; 'Philips, Harry J., Jr. (skip.philips@taylorporter.com)'; 'ryan.french@taylorporter.com'; Tom Clark; 'W. Brett Mason - Stone Pigman Walther Wittmann L.L.C. (bmason@stonepigman.com)'; J. E. Cullens, Jr.  
**Cc:** A'Dair Flynt; Mirais Holden  
**Subject:** RE: ESI Protocol forms

I have had great success with Nextpoint. I found it to be very user-friendly.

Best regards,

Grant J. Guillot

### Grant J. Guillot

Associate



450 Laurel Street, Suite 1900 | Baton Rouge, LA 70801  
**main** 225.336.5200 | **direct** 225.378.3226 | **mobile** 225.614.7838  
**efax** 225.336.5118 | **fax** 225.336.5220

[grant.guillot@arlaw.com](mailto:grant.guillot@arlaw.com)

website bio vCard map



---

**From:** James A Brown [mailto:jabrown@liskow.com]

**Sent:** Tuesday, September 19, 2017 4:54 PM

**To:** Grant J. Guillot; 'Le Clercq, F. Theodore (ted@deutschkerrigan.com)'; 'Michael W. McKay - Stone Pigman Walther Wittmann LLC (mmckay@stonepigman.com)'; 'Philips, Harry J., Jr. (skip.philips@taylorporter.com)'; 'ryan.french@taylorporter.com'; Tom Clark; 'W. Brett Mason - Stone Pigman Walther Wittmann L.L.C. (bmason@stonepigman.com)'; 'J. E. Cullens, Jr.'

**Cc:** A'Dair Flynt; Mirais Holden

**Subject:** RE: ESI Protocol forms

Also, we have had good experience with Docusource as an ESI vendor.

---

**From:** James A Brown

**Sent:** Tuesday, September 19, 2017 4:52 PM

**To:** James A Brown <jabrown@liskow.com>; Grant J. Guillot <Grant.Guillot@arlaw.com>; Le Clercq, F. Theodore (ted@deutschkerrigan.com) <ted@deutschkerrigan.com>; Michael W. McKay - Stone Pigman Walther Wittmann LLC (mmckay@stonepigman.com) <mmckay@stonepigman.com>; Philips, Harry J., Jr. (skip.philips@taylorporter.com) <skip.philips@taylorporter.com>; ryan.french@taylorporter.com; V. Thomas Clark - Adams and Reese, LLP (tom.clark@arlaw.com) <tom.clark@arlaw.com>; W. Brett Mason - Stone Pigman Walther Wittmann L.L.C. (bmason@stonepigman.com) <bmason@stonepigman.com>; J. E. Cullens, Jr. <cullens@lawbr.net>

**Cc:** A'Dair Flynt <AFlynt@liskow.com>; Mirais Holden <MHolden@liskow.com>

**Subject:** FW: ESI Protocol forms

Dear counsel:

Per our discussion (and subject to Buck's declinatory exception of improper venue and supervisory review thereof), attached are some ESI protocol forms and materials.

Regards,  
James

---

**From:** Tyler Trew  
**Sent:** Tuesday, September 19, 2017 4:38 PM  
**To:** James A Brown <[jabrown@liskow.com](mailto:jabrown@liskow.com)>  
**Subject:** ESI Protocol Order

Attached are a couple of forms along with an article (<https://percipient.co/15-issues-consider-negotiating-esi-protocol/>) summarizing the various issues parties must consider when drafting an ESI Protocol.

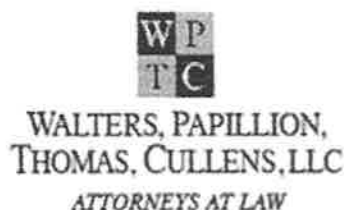
**Tyler D. Trew**

(504) 556-4164 Direct  
(504) 556-4108 Fax  
(504) 919-7007 Cell

**LISKOW&LEWIS**  
New Orleans | Lafayette | Houston

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New Orleans, LA 70139  
[www.liskow.com](http://www.liskow.com)

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**From:** J. E. Cullens, Jr.

**Sent:** Wednesday, September 20, 2017 4:47 PM

**To:** Brown, James A. (jabrown@liskow.com) <jabrown@liskow.com>; Grant J. Guillot <Grant.Guillot@arlaw.com>; Le Clercq, F. Theodore (ted@deutschkerrigan.com) <ted@deutschkerrigan.com>; Michael W. McKay - Stone Pigman Walther Wittmann LLC (mmckay@stonepigman.com) <mmckay@stonepigman.com>; Philips, Harry J., Jr. (skip.philips@taylorporter.com) <skip.philips@taylorporter.com>; ryan.french@taylorporter.com; V. Thomas Clark - Adams and Reese, LLP (tom.clark@arlaw.com) <tom.clark@arlaw.com>; W. Brett Mason - Stone Pigman Walther Wittmann L.L.C. (bmason@stonepigman.com) <bmason@stonepigman.com>

**Cc:** Patti O. Sollie <psollie@lawbr.net>; Jennifer Wise Moroux <jmoroux@lawbr.net>

**Subject:** LAHC--CMO / DISCOVERY +

Good telephone conference yesterday. Thanks to everyone for participating; we had input from all of the remaining parties with the exception of CGI. Skip and Ryan, we hope you agree with the general consensus surrounding our discussions of yesterday, and, of course, we're confident you'll let us know if not. In brief, we talked about:

#### **USING / SHARING A SINGLE THIRD-PARTY VENDOR FOR E-DISCOVERY**

It was the general consensus that we select, use, and share the costs of a single, agreed-upon outside vendor to handle the production / management of electronic discovery in this case.



I am told that LAHC has approximately one (1) terabyte (1,000 GBs) of claims data plus about another 300-500 GB or more of other, non-claims, data.

If and when you can, please let us know the approximate size of your respective client's data relevant to this litigation.

To date, the following vendors have been suggested: Nextpoint ; Docusource

If anyone would like to suggest any other possible vendor, please do so.

## **ESI PROTOCOLS**

It was the general consensus that we try to agree upon and use a mutually acceptable protocol to manage ESI discovery.

James circulated a "form" used in another case to get us started.

I suggest that we all review and consider what James circulated and be prepared to discuss more in detail during our next conference.

## **PROTECTIVE ORDER**

Given the vast amount of healthcare-related / HIPAA data involved in this case, a protective order is a necessity before we start exchanging documents and information. My firm has agreed to circulate a proposed protective order for everyone's consideration and input.

## **CASE SCHEDULING ORDER**

It was the general consensus that we set aside next year (2018) to get fact discovery done, the first six (6) months or so of 2019 to get expert work / discovery done, file the PTO in June 2019, with the expectation of going to trial in the late summer or fall of 2019.

Attached is a .pdf copy of a proposed CSO which includes most, if not all, of the dates we floated yesterday. As you'll see, given the number of busy attorneys involved in this case, we are wise (IMHO) to block out approximately five (5) days per month NOW starting in January 2018 and ending in October 2018 so we can set depositions without pulling our proverbial hair out trying to find available dates for all of us next year.

Please review and consider all of this before we take the next step.

I suggest that we schedule another telephone conference to talk again about all of these issues; how about:

**Monday, September 25<sup>th</sup> @ 3:30 pm**

Please let us know if this time works for you or not; and if not, advise of other alternative dates / times. Once we get a good date and time, my office will circulate a call-in number and go from there.

Thanks all ... and, as always, please call or email me if you have any questions or concerns.

J.Cullens

## J. Cullens

---

**From:** J. E. Cullens, Jr.  
**Sent:** Monday, September 25, 2017 4:07 PM  
**To:** Mason, W. Brett; 'Skip Philips'; 'James A Brown'; Grant J. Guillot; Le Clercq, F. Theodore (ted@deutschkerrigan.com); McKay, Michael W.; Ryan French; V. Thomas Clark - Adams and Reese, LLP (tom.clark@arlaw.com); Robert W. Barton  
**Cc:** Patti O. Sollie; Jennifer Wise Moroux  
**Subject:** LAHC--OCT 2nd TELE CONF  
**Attachments:** CMO - JEC Draft - 9 20 17.pdf

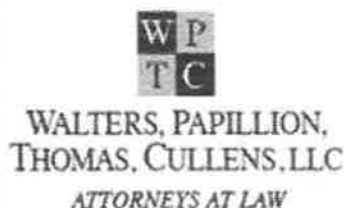
As we discussed and agreed, let's regroup and talk again next **Monday, Oct. 2<sup>nd</sup> at 3:30 pm**. Same call-in number:

CALL: 1-877-621-8636  
PIN: 122515

If at all possible, let's all be prepared to agree on the proposed dates in the CMO circulated last week (another .pdf copy attached) AND be ready to agree upon ~ five (5) dates per month, starting in January thru October 2018, to set aside for depositions.

Talk then ... and thanks,

J.Cullens



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**From:** J. E. Cullens, Jr.  
**Sent:** Monday, September 25, 2017 1:10 PM  
**To:** Mason, W. Brett <bmason@stonepigman.com>; 'Skip Philips' <skip.philips@taylorporter.com>; 'James A Brown' <jabrown@liskow.com>; Grant J. Guillot <Grant.Guillot@arlaw.com>; Le Clercq, F. Theodore (ted@deutschkerrigan.com) <ted@deutschkerrigan.com>; McKay, Michael W. <mmckay@stonepigman.com>; Ryan French <Ryan.French@taylorporter.com>; V. Thomas Clark - Adams and Reese, LLP (tom.clark@arlaw.com) <tom.clark@arlaw.com>  
**Cc:** Patti O. Sollie <psollie@lawbr.net>; Jennifer Wise Moroux <jmoroux@lawbr.net>  
**Subject:** RE: LAHC--CMO / DISCOVERY +

Here's the call-in number for today's 3:30 conference call:

## J. Cullens

---

**From:** J. E. Cullens, Jr.  
**Sent:** Tuesday, October 3, 2017 11:32 AM  
**To:** Brown, James A. (jabrown@liskow.com); Grant J. Guillot; J. E. Cullens, Jr.; Jennifer Wise Moroux; Le Clercq, F. Theodore (ted@deutschkerrigan.com); Michael W. McKay - Stone Pigman Walther Wittmann LLC (mmckay@stonepigman.com); Patti O. Sollie; Philips, Harry J., Jr. (skip.philips@taylorporter.com); Robert W. Barton (bob.barton@taylorporter.com); ryan.french@taylorporter.com; V. Thomas Clark - Adams and Reese, LLP (tom.clark@arlaw.com)  
**Subject:** LAHC--Revised CMO  
**Attachments:** CMO - JEC Draft - 10 3 17.pdf

As per our discussion of yesterday, attached please find a .pdf copy of a revised CMO for your review and input.

As we also agreed, we will talk again on Thursday, October 5<sup>th</sup>, at 2:30 pm to finalize the deposition dates prior to filing.

CALL: 1-877-621-8636

PIN: 122515

Talk then. And, as always, please call or email me with any questions or concerns.

J.Cullens



**J. E. Cullens, Jr.**  
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## J. Cullens

---

**From:** J. E. Cullens, Jr.  
**Sent:** Thursday, October 5, 2017 3:43 PM  
**To:** Brown, James A. (jabrown@liskow.com); Grant J. Guillot; J. E. Cullens, Jr.; Jennifer Wise Moroux; Le Clercq, F. Theodore (ted@deutschkerrigan.com); Michael W. McKay - Stone Pigman Walther Wittmann LLC (mmckay@stonepigman.com); Mirais Holden; Patti O. Sollie; Philips, Harry J., Jr. (skip.philips@taylorporter.com); Robert W. Barton (bob.barton@taylorporter.com); ryan.french@taylorporter.com; V. Thomas Clark - Adams and Reese, LLP (tom.clark@arlaw.com); W. Brett Mason - Stone Pigman Walther Wittmann L.L.C. (bmason@stonepigman.com)  
**Cc:** Patti O. Sollie  
**Subject:** LAHC - CMO  
**Attachments:** CMO - JEC Draft - 10 5 17.pdf

After our conference call, Brett Mason requested that Nov. 14 & 15, 2018 be removed from our list of designated depo dates, and that two (2) alternative dates in Nov. 2018 be added. I added Nov. 8 & 9, 2018 ... and hope this is not a problem with any of you.

In all other respects, the attached CMO should reflect our discussion and agreement of earlier today. If not, of course, please let me know.

If the attached meets with your approval, please sign and return a .pdf copy of your signature for filing.

Please do so, if at all possible, on or before MONDAY, OCTOBER 9<sup>th</sup>, so we may file with the Court.

We hope to circulate a proposed PROTECTIVE ORDER tomorrow—or early next week at the latest.

Lastly, please calendar our next telephone conference to, we hope, decide upon an outside vendor to handle electronic data / discovery:

THURS, OCT. 19<sup>th</sup> @ 2:30 PM

CALL: 1-877-621-8636  
PIN: 122515

Thanks all ... and talk soon,

J.Cullens



**J. E. Cullens, Jr.**  
12345 Perkins Road, Building 1  
Baton Rouge, LA 70810  
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[www.lawbr.net](http://www.lawbr.net)



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## J. Cullens

---

**From:** J. E. Cullens, Jr.  
**Sent:** Monday, November 6, 2017 1:34 PM  
**To:** Brown, James A. (jabrown@liskow.com); Grant J. Guillot; J. E. Cullens, Jr.; Jennifer Wise Moroux; Le Clercq, F. Theodore (ted@deutschkerrigan.com); Michael W. McKay - Stone Pigman Walther Wittmann LLC (mmckay@stonepigman.com); Mirais Holden; Patti O. Sollie; Philips, Harry J., Jr. (skip.philips@taylorporter.com); Robert W. Barton (bob.barton@taylorporter.com); ryan.french@taylorporter.com; V. Thomas Clark - Adams and Reese, LLP (tom.clark@arlaw.com); W. Brett Mason - Stone Pigman Walther Wittmann L.L.C. (bmason@stonepigman.com)  
**Cc:** Patti O. Sollie  
**Subject:** RE: LAHC - Conference Call

Given that Tom, Skip, and I are all available for our reset telephone conference on:

**Wednesday (11/8) @ 1:30 pm**

Let's talk then. Same call-in number:

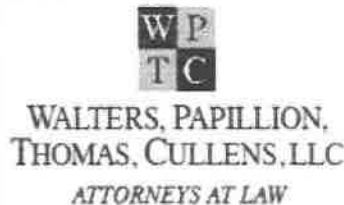
**1-877-621-8636**

**PIN: 122515**

Please let us know of any problems with this reset time .... And we'll go from there.

Thanks all,

J.Cullens



**J. E. Cullens, Jr.**  
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fax 225.236.3650  
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**From:** Skip Philips [mailto:skip.philips@taylorporter.com]  
**Sent:** Friday, November 03, 2017 2:28 PM  
**To:** 'Tom Clark' <Tom.Clark@arlaw.com>; J. E. Cullens, Jr. <cullens@lawbr.net>; James A Brown <jabrown@liskow.com>  
**Cc:** Patti O. Sollie <psollie@lawbr.net>; Grant J. Guillot <Grant.Guillot@arlaw.com>; Le Clercq, F. Theodore (ted@deutschkerrigan.com) <ted@deutschkerrigan.com>; Michael W. McKay - Stone Pigman Walther Wittmann LLC (mmckay@stonepigman.com) <mmckay@stonepigman.com>; Mirais Holden <MHolden@liskow.com>; Robert W. Barton <bob.barton@taylorporter.com>; Ryan French <Ryan.French@taylorporter.com>; W. Brett Mason - Stone Pigman Walther Wittmann L.L.C. (bmason@stonepigman.com) <bmason@stonepigman.com>; Jennifer Wise Moroux <jmoroux@lawbr.net>  
**Subject:** RE: LAHC - Conference Call

## J. Cullens

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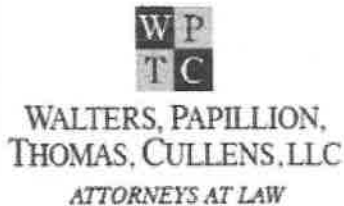
**From:** Patti O. Sollie  
**Sent:** Tuesday, November 14, 2017 12:55 PM  
**To:** Skip Philips; 'Tom Clark'; James A Brown; Grant J. Guillot; Le Clercq, F. Theodore (ted@deutschkerrigan.com); Michael W. McKay - Stone Pigman Walther Wittmann LLC (mmckay@stonepigman.com); Mirais Holden; Robert W. Barton; Ryan French; harry.rosenberg@phelps.com; W. Brett Mason - Stone Pigman Walther Wittmann L.L.C. (bmason@stonepigman.com)  
**Cc:** J. E. Cullens, Jr.; Jennifer Wise Moroux  
**Subject:** LAHC - Conference Call

Below is the call in information for the conference call scheduled for 3:00 this afternoon.

1-877-621-8636  
PIN: 122515

Please let us know if you have any questions.

Thank you.



**Patti O. Sollie**  
**Paralegal**  
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Baton Rouge, LA 70810  
ph 225.236.3642  
fax 225.236.3650  
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LOUISIANA HEALTH COOPERATIVE (LAHC) IN RECEIVERSHIP  
LITIGATION SUPPORT - DISCOVERY RESPONSE OF FEBRUARY 2018  
DELIVERABLES TRACKING



CONFIDENTIAL - WARNING: Assume all files contain Protected Health Information (PHI) and/or Personally Identifiable Information (PII);  
All Data Subject to the Applicable PROTECTIVE ORDER (12/13/17).

|         | USB Drive - Folder / File<br>(Deliverable)  | LAHC Source Data<br>Origination   | ≈ Size<br>(GBs) | DESCRIPTION/BATES<br>NUMBER  | Access Instructions   |
|---------|---|---|-----------------|--|---|
| DRIVE 1 |   |   |                 |  |   |
| 1       | LAHC Mimecast<br>(Inception to August 31, 2015)   | Onsite initial backup of LAHC Mimecast by Microsoft   | 175             | LAHC_E_Production/<br>LAHC_E_00000001 to<br>03480679                 | Password required to decrypt the drive. 7-Zip<br>required to extract the files. |
| 2       | a) Claim Images<br><br>b) EOB Images<br>c) Termination Leters List<br>d) Subscriber Invoices - Correction Images<br>e) Subscriber Invoices - Reconiliation Images<br>f) Subscriber Injvoices - I-Bill Adjustment<br>g) Subscriber Invoices<br>h) Subscriber Inovices<br>i) Member ID Card Production<br>j) Subscriber Welcome Letters and CMS PreAudit Files<br>k) Member Enrollment Issues<br>l) Subscribed Payments Unidentified<br>m) Member Eligibility Missing<br>n) Provider Listings<br>o) Member Cacnellations Notices Returned Mail<br>p) Subscriber Returned Payments and Refunds<br>q) Member Retaurned Mail Undeliverable<br>r) Certificates of Coverage<br>s) Large Group Documents<br>t) Off Exchanges Documents<br>u) Schedule of Benefits Documents<br>(Inception to August 31, 2015) | a) E:\Images\PRO; \CGI_Data\Claims; \InterDept\IT-Fin-<br>Ops\2016 Claim Receivable; \InterDept\IT-Ops\837 Files -<br>Emdeon- Change Healthcare<br>b) \LAHC\Emdeon EoBs<br>c) \LAHC\Termination Letters - Non Payment<br>d) \LAHC\Corrected Invoices<br>e) \LAHC\Final Reconciliation<br>f) \LAHC\I-Bill Adjustments<br>g) \LAHC\Invoices<br>h) \LAHC\Invoices - Returned undeliverable<br>i) \LAHC\IDCards<br>j) \LAHC\lahc welcome letters<br>k) \LAHC\Member updates<br>l) /LAHC/Member updates<br>m) \LAHC\Old Spreadsheets\Missing Members<br>n) \LAHC\ProviderFiles<br>o) \LAHC\Return Member Cancellation Notices<br>p) \LAHC\Returned payments and refunds<br>q) \LAHC\Return Member Cancellation Notices<br>r) \LAHC\2015 COCs<br>s) \LAHC\2015 Large Group<br>t) \LAHC\2015 OE Letter Copies<br>u) \LAHC\2015 Schedules of Benefits | 24.7            | LAHC_HD1_Production/<br>LAHC_CONFIDENTIAL<br>PHI_0000001 to 01224937 | Password required to decrypt the drive. 7-Zip<br>required to extract the files. |

|                | USB Drive - Folder / File<br>(Deliverable)                  | LAHC Source Data<br>Origination                      | ≈ Size<br>(GBs) | DESCRIPTION/BATES<br>NUMBER    | Access Instructions   |
|----------------|---|--|-----------------|--------------------------------|---|
| 3              | Jones Walker Files  | Files Obtained from Jones Walker                     | 3.92            | LAHC-JW_00000001 to 00007243   | Password required to decrypt the drive. No special instructions   |
| 4              | CMS FOIA  | Documents obtained from CMS in response to LAHC FOIA | 0.01            | LAHC-CMS FOIA_000001 to 000531 | Password required to decrypt the drive. No special instructions   |
| <b>DRIVE 2</b> |   |  |                 |                                |   |
| 5              | GRI CMS Folder as of 2018-01-23                             | Files provided by GRI.                               | 3.4             |                                | Drive Password required to open and decrypt the drive.  |
| 6              | GRI Edge Files as of 2018-01-23                             | Files provided by GRI.                               | 12.3            |                                | Drive Password required to open and decrypt the drive.  |
| 7              | GRI Edge Interface Files as of 2018-01-24                   | Files provided by GRI.                               | 32.5            |                                | Drive Password required to open and decrypt the drive.  |
| 8              | GRI Employee Email and PST Files as of 2018-01-24           | Files provided by GRI.                               | 2.2             |                                | Drive Password required to open and decrypt the drive.  |
| 9              | GRI File Exchanges with Vendors 1 as of 2018-01-23          | Files provided by GRI.                               | 16.7            |                                | Drive Password required to open and decrypt the drive.  |
| 10             | GRI File Exchanges with Vendors 2 as of 2018-01-23          | Files provided by GRI.                               | 306             |                                | Drive Password required to open and decrypt the drive.  |
| 11             | GRI Interface Files - 837 Files as of 2018-01-23            | Files provided by GRI.                               | 0.1             |                                | Drive Password required to open and decrypt the drive.  |
| 12             | GRI Interface Files - To and From CMS as of 2018-01-23      | Files provided by GRI.                               | 1.7             |                                | 1) Drive Password required to open & decrypt the drive.<br>2) Some files are password protected by GRI (Contact Any Willoughby (GRI) for the Password). Password unknown to LAHC. |
| 13             | GRI Interface Files - To Health Integrated as of 2018-01-23 | Files provided by GRI.                               | 1.9             |                                | Drive Password required to open and decrypt the drive.  |
| 14             | GRI Management and Staff Document Files as of 2018-01-23    | Files provided by GRI.                               | 13.5            |                                | 1) Drive Password required to open & decrypt the drive.<br>2) Some files are password protected by GRI (Contact Any Willoughby (GRI) for the Password). Password unknown to LAHC. |
| 15             | GRI Miscellaneous Files 1 as of 2018-01-23                  | Files provided by GRI.                               | <0.1            |                                | Drive Password required to open and decrypt the drive.  |

**EXHIBIT A**



|    | USB Drive - Folder / File<br>(Deliverable)                             | LAHC Source Data<br>Origination                              | ≈ Size<br>(GBs) | DESCRIPTION/BATES<br>NUMBER | Access Instructions   |
|----|--|--|-----------------|-----------------------------|---|
| 16 | GRI Staff Document Files as of 2018-01-24                              | Files provided by GRI.                                       | 0.6             |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Some files are password protected by GRI (Contact Any Willoughby (GRI) for the Password). Password unknown to LAHC.                         |
| 17 | GRI Voicemail Files as of 2018-01-23                                   | Files provided by GRI.                                       | <0.1            |                             | Drive Password required to open and decrypt the drive.  |
| 18 | LAHC Accounting System SQL Backups as of 2015-09-01                    | LAHC SQL Database Backups                                    | 0.3             |                             | Drive Password required to open and decrypt the drive.  |
| 19 | LAHC SharePoint Site as of 2018-01-28                                  | SharePoint Site/Data maintained and used by LAHC             | 100             |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |
| 20 | Backup Image - Alice Dupre - Latitude E5530 (7LTHLX1) 2015-09-10       | Onsite initial backup of LAHC computer by Receivership Team. | 77.3            |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Microsoft SQL Server Software required to read backup.  |
| 21 | Backup Image - Anisa Dominick - Latitude E5540 (85TTM12) - 2015-09-14  | Onsite initial backup of LAHC computer by Receivership Team. | 18.6            |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |
| 22 | Backup Image - Apollo VM Server - LAHC Data Warehouse as of 2018-01-15 | Onsite backup of LAHC's Apollo VM Server                     | 0.1             |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |

## EXHIBIT A

|    | USB Drive - Folder / File<br>(Deliverable)                                 | LAHC Source Data<br>Origination                              | ≈ Size<br>(GBs) | DESCRIPTION/BATES<br>NUMBER | Access Instructions   |
|----|--|--|-----------------|-----------------------------|---|
| 23 | Backup Image - Barbara Baudin - Latitude E5530<br>(4Y9NWW1) - 2015-09-15   | Onsite initial backup of LAHC computer by Receivership Team. | 47.8            |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |
| 24 | Backup Image - Chanelle Fortune - Latitude E5540<br>(80TTM12) - 2015-09-11 | Onsite initial backup of LAHC computer by Receivership Team. | 25.5            |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |
| 25 | Backup Image - Charlie Calvi - Latitude E5530<br>(F35FXW1) - 2015-09-08    | Onsite initial backup of LAHC computer by Receivership Team. | 21.5            |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |
| 26 | Backup Image - Cheri Carter - Latitude E5530<br>(FX9NWW1) - 2015-09-09     | Onsite initial backup of LAHC computer by Receivership Team. | 39.8            |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |
| 27 | Backup Image - Chrissy Lopez - Latitude E5540<br>(FRJYK12) - 2015-09-08    | Onsite initial backup of LAHC computer by Receivership Team. | 28.7            |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |

## EXHIBIT A

|    | USB Drive - Folder / File<br>(Deliverable)  | LAHC Source Data<br>Origination                              | ≈ Size<br>(GBs) | DESCRIPTION/BATES<br>NUMBER | Access Instructions   |
|----|---|--|-----------------|-----------------------------|---|
| 28 | Backup Image - Christin Cantavespri - Latitude E5530 (570VYY1) - 2015-09-11         | Onsite initial backup of LAHC computer by Receivership Team. | 57.9            |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |
| 29 | Backup Image - Clint Archer - Latitude E5540 (86TTM12) 2015-09-03                   | Onsite initial backup of LAHC computer by Receivership Team. | 59.1            |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |
| 30 | Backup Image - Clint Archer - Latitude E5540 (86TTM12) 2015-10-12 - with DB2 of GRI | Onsite initial backup of LAHC computer by Receivership Team. | 73.7            |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |
| 31 | Backup Image - Dan Talbot - Latitude E5530 (6Z9NWW1) - 2015-09-15                   | Onsite initial backup of LAHC computer by Receivership Team. | 39.4            |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |
| 32 | Backup Image - Dawn Nickens Monjure - Latitude E5530 (C6M0ZW1) - 2015-09-14         | Onsite initial backup of LAHC computer by Receivership Team. | 53.6            |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |

## EXHIBIT A

|    | USB Drive - Folder / File<br>(Deliverable)   | LAHC Source Data<br>Origination                              | ≈ Size<br>(GBs) | DESCRIPTION/BATES<br>NUMBER | Access Instructions   |
|----|--|--|-----------------|-----------------------------|---|
| 33 | Backup Image - Dee Pitchford - Latitude E5530<br>(CZ9NWW1) - 2015-09-11              | Onsite initial backup of LAHC computer by Receivership Team. | 57.1            |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |
| 34 | Backup Image - Doug Carpenter - Latitude E5530<br>(8R7HRY1) - 2015-09-09             | Onsite initial backup of LAHC computer by Receivership Team. | 98.6            |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |
| 35 | Backup Image - Edge VM Server - LAHC Backup of CMS Reporting Server as of 2018-01-13 | Onsite backup of LAHC's Edge Prod VM Server.                 | <0.1            |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |
| 36 | Backup Image - EHP VM Server - LAHC Backup of EHP System from GRI as of 2018-01-15   | Onsite backup of LAHC's EHP Prod VM Server.                  | 0.2             |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |
| 37 | Backup Image - Eve Lion - Latitude E5530 (345FXW1) - 2015-09-10                      | Onsite initial backup of LAHC computer by Receivership Team. | 32.4            |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |

## EXHIBIT A

|    | USB Drive - Folder / File<br>(Deliverable)   | LAHC Source Data<br>Origination                              | ≈ Size<br>(GBs) | DESCRIPTION/BATES<br>NUMBER | Access Instructions   |
|----|--|--|-----------------|-----------------------------|---|
| 38 | Backup Image - Geoaccess1-PC - Optiplex 7010<br>(B4CV3W1) - 2015-09-25                                 | Onsite initial backup of LAHC computer by Receivership Team. | 44.2            |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |
| 39 | Backup Image - Geoaccess-PC - Optiplex 7010<br>(25WW3W1) - 2015-09-25                                  | Onsite initial backup of LAHC computer by Receivership Team. | 61.7            |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |
| 40 | Backup Image - Greg Dumas - Latitude E5530<br>(HY9NWW1) - 2015-09-15                                   | Onsite initial backup of LAHC computer by Receivership Team. | 40.8            |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |
| 41 | Backup Image - Greg_Cromer - Dell Laptop XPS Ultrabook13 (9YQ42W1) - 2015-09-01<br>b_full_b1_s1_v1.tib | Onsite initial backup of LAHC computer by Receivership Team. | 11.6            |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |
| 42 | Backup Image - Greg_Cromer - Dell Laptop XPS Ultrabook13 (9YQ42W1) - 2015-09-01<br>b_full_b1_s1_v2.tib | Onsite initial backup of LAHC computer by Receivership Team. | 20.9            |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |
| 43 | Backup Image - GRI Backups 2015-08-31 - Received 2015-09-14.tib  | Files originally provided by GRI and backed up by LAHC.      | 0.7             |                             | Password required to decrypt the drive.   |

## EXHIBIT A

|    | USB Drive - Folder / File<br>(Deliverable)                                   | LAHC Source Data<br>Origination                              | ≈ Size<br>(GBs) | DESCRIPTION/BATES<br>NUMBER | Access Instructions   |
|----|--|--|-----------------|-----------------------------|---|
| 44 | Backup Image - Holly Perry - Latitude E5530 (CBXTVY1) - 2015-09-14.tib       | Onsite initial backup of LAHC computer by Receivership Team. | 44.2            |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |
| 45 | Backup Image - Jennifer Pinkins - Latitude E5540 (G9TTM12) - 2015-09-11.tib  | Onsite initial backup of LAHC computer by Receivership Team. | 26.2            |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |
| 46 | Backup Image - Jeremy Murphy - Latitude E5530 (CLTHLX1) - 2015-09-03.tib     | Onsite initial backup of LAHC computer by Receivership Team. | 57.2            |                             | 1).Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |
| 47 | Backup Image - Jim Starnes - Latitude E5530 (FFTXXW1) - 2015-09-30.tib       | Onsite initial backup of LAHC computer by Receivership Team. | 33.5            |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |
| 48 | Backup Image - Jodi Carter-Jones - Latitude E5540 (FYJYK12) - 2015-09-08.tib | Onsite initial backup of LAHC computer by Receivership Team. | 18.6            |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |

## EXHIBIT A

|    | USB Drive - Folder / File<br>(Deliverable)                                   | LAHC Source Data<br>Origination                              | ≈ Size<br>(GBs) | DESCRIPTION/BATES<br>NUMBER | Access Instructions   |
|----|--|--|-----------------|-----------------------------|---|
| 49 | Backup Image - John Massarini - Latitude E5540<br>(1HTTM12) - 2015-09-08.tib | Onsite initial backup of LAHC computer by Receivership Team. | 22.8            |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |
| 50 | Backup Image - John Welborn - XPS 13 (JTTWX02) -<br>2015-09-22.tib           | Onsite initial backup of LAHC computer by Receivership Team. | 97              |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |
| 51 | Backup Image - John Welborn - XPS 13 (JTTWX02) -<br>2015-09-29.tib           | Onsite initial backup of LAHC computer by Receivership Team. | 97.8            |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |
| 52 | Backup Image - Julia Peek - Latitude E5530 (C09HRY1) -<br>2015-09-03.tib     | Onsite initial backup of LAHC computer by Receivership Team. | 51              |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |
| 53 | Backup Image - Karen Gaspard - Latitude E5530<br>(5RSXXW1) - 2015-09-03.tib  | Onsite initial backup of LAHC computer by Receivership Team. | 26.3            |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |

## EXHIBIT A

|    | USB Drive - Folder / File<br>(Deliverable)                                    | LAHC Source Data<br>Origination                              | ~ Size<br>(GBs) | DESCRIPTION/BATES<br>NUMBER | Access Instructions   |
|----|---|--|-----------------|-----------------------------|---|
| 54 | Backup Image - Kevin McCall - Latitude E5540<br>(JVJYK12) - 2015-09-22.tib    | Onsite initial backup of LAHC computer by Receivership Team. | 21              |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |
| 55 | Backup Image - Kimberly Jones - Latitude E5540<br>(4MPTG12) - 2015-09-22.tib  | Onsite initial backup of LAHC computer by Receivership Team. | 37.2            |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |
| 56 | Backup Image - LAHC Pre-Receivership Computer Backup Files - 2015-09-07.tib   | Onsite initial backup of LAHC computer by Receivership Team. | 181.9           |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |
| 57 | Backup Image - Lauren Yazbeck - Latitude E5540<br>(28TTM12) - 2015-09-11.tib  | Onsite initial backup of LAHC computer by Receivership Team. | 26.4            |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |
| 58 | Backup Image - Maria Guarnieri - Latitude E5540<br>(91TTM12) - 2015-09-08.tib | Onsite initial backup of LAHC computer by Receivership Team. | 15.6            |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |

## EXHIBIT A



|    | USB Drive - Folder / File<br>(Deliverable)                                   | LAHC Source Data<br>Origination                              | ≈ Size<br>(GBs) | DESCRIPTION/BATES<br>NUMBER | Access Instructions   |
|----|--|--|-----------------|-----------------------------|---|
| 59 | Backup Image - Mohammed Nawaz - Latitude E5530<br>(GK7HRY1) - 2015-09-09.tib | Onsite initial backup of LAHC computer by Receivership Team. | 66.6            |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |
| 60 | Backup Image - Nadine Wells - Latitude E5530<br>(H79HRY1) - 2015-09-23.tib   | Onsite initial backup of LAHC computer by Receivership Team. | 45.3            |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |
| 61 | Backup Image - Natasha Sewell - Latitude E5540<br>(JPPTG12) - 2015-09-08.tib | Onsite initial backup of LAHC computer by Receivership Team. | 43.6            |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |
| 62 | Backup Image - Niki Cromer - Latitude E5540<br>(B8GVM12) - 2015-09-03.tib    | Onsite initial backup of LAHC computer by Receivership Team. | 26.6            |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |
| 63 | Backup Image - Pamela Kennedy - Latitude E5540<br>(9GTTM12) - 2015-09-22.tib | Onsite initial backup of LAHC computer by Receivership Team. | 28.8            |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |

## EXHIBIT A

|    | USB Drive - Folder / File<br>(Deliverable)                                   | LAHC Source Data<br>Origination                              | ≈ Size<br>(GBs) | DESCRIPTION/BATES<br>NUMBER | Access Instructions   |
|----|--|--|-----------------|-----------------------------|---|
| 64 | Backup Image - Prodsupport-PC - Optiplex 7010<br>(81WW3W1) - 2015-09-25.tib  | Onsite initial backup of LAHC computer by Receivership Team. | 91.3            |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |
| 65 | Backup Image - Robin Mushkin - Latitude E5530<br>(77BHRY1) - 2015-09-15.tib  | Onsite initial backup of LAHC computer by Receivership Team. | 51              |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |
| 66 | Backup Image - Rodney Bierria - Latitude E5540<br>(BB5WM12) - 2015-09-14.tib | Onsite initial backup of LAHC computer by Receivership Team. | 23.2            |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |
| 67 | Backup Image - Rusti White - Latitude E5540 (44VTM12) -<br>2015-09-08.tib    | Onsite initial backup of LAHC computer by Receivership Team. | 33.6            |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |
| 68 | Backup Image - Ryan Germain - Latitude E5530<br>(272H3X1) - 2015-09-22.tib   | Onsite initial backup of LAHC computer by Receivership Team. | 54.5            |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |

## EXHIBIT A

|    | USB Drive - Folder / File<br>(Deliverable)                                     | LAHC Source Data<br>Origination                              | ≈ Size<br>(GBs) | DESCRIPTION/BATES<br>NUMBER | Access Instructions   |
|----|--|--|-----------------|-----------------------------|---|
| 69 | Backup Image - Ryan Starnes - Latitude E5540<br>(89GVM12) - 2015-09-10.tib     | Onsite initial backup of LAHC computer by Receivership Team. | 143             |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |
| 70 | Backup Image - Sam Blount - Latitude E5530 (GS7HRY1) - 2015-09-21.tib          | Onsite initial backup of LAHC computer by Receivership Team. | 38.8            |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |
| 71 | Backup Image - Shannon Schwartz - Latitude E5530<br>(783YXW1) - 2015-09-09.tib | Onsite initial backup of LAHC computer by Receivership Team. | 38.6            |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |
| 72 | Backup Image - Sonia Puente - Latitude E5530<br>(GR4YXW1) - 2015-09-10.tib     | Onsite initial backup of LAHC computer by Receivership Team. | 50.2            |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |
| 73 | Backup Image - SQL-PC - Optiplex 7010 (82J54W1) - 2015-09-25.tib               | Onsite initial backup of LAHC computer by Receivership Team. | 31              |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |

## EXHIBIT A

|    | USB Drive - Folder / File<br>(Deliverable)                                   | LAHC Source Data<br>Origination                              | ≈ Size<br>(GBs) | DESCRIPTION/BATES<br>NUMBER | Access Instructions   |
|----|--|--|-----------------|-----------------------------|---|
| 74 | Backup Image - Sylvia Theriot - Latitude E5530<br>(9V8VVY1) - 2015-09-30.tib | Onsite initial backup of LAHC computer by Receivership Team. | 49.8            |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |
| 75 | Backup Image - Tanzie Jones - Latitude E5530 (762H3X1) - 2015-09-14.tib      | Onsite initial backup of LAHC computer by Receivership Team. | 59.5            |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |
| 76 | Backup Image - Teresa Heap - Latitude E5530 (2R7HRY1) - 2015-09-03.tib       | Onsite initial backup of LAHC computer by Receivership Team. | 66.5            |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |
| 77 | Backup Image - Teresa Heap - Latitude E5530 (2R7HRY1) - 2015-09-10.tib       | Onsite initial backup of LAHC computer by Receivership Team. | 66.6            |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |
| 78 | Backup Image - Terry Delaney - Latitude E5540 (BYJYK12) - 2015-09-11.tib     | Onsite initial backup of LAHC computer by Receivership Team. | 15.9            |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |

## EXHIBIT A

|    | USB Drive - Folder / File<br>(Deliverable)                                   | LAHC Source Data<br>Origination                              | ≈ Size<br>(GBs) | DESCRIPTION/BATES<br>NUMBER | Access Instructions   |
|----|--|--|-----------------|-----------------------------|---|
| 79 | Backup Image - Tommy Teague - Latitude E5530<br>(9J7HRY1) - 2015-09-02.tib   | Onsite initial backup of LAHC computer by Receivership Team. | 42.5            |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |
| 80 | Backup Image - Tony Cimino - Latitude E5530<br>(6FM0ZW1) - 2015-09-08.tib    | Onsite initial backup of LAHC computer by Receivership Team. | 40.8            |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |
| 81 | Backup Image - Trenell Hayes - Latitude E5530<br>(8CYXXW1) - 2015-09-15.tib  | Onsite initial backup of LAHC computer by Receivership Team. | 25.3            |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |
| 82 | Backup Image - Tricia Shaheen - Latitude E5530<br>(362VYY1) - 2015-09-14.tib | Onsite initial backup of LAHC computer by Receivership Team. | 41.9            |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |
| 83 | Backup Image - Victoria Leyva - Latitude E5540<br>(DRSTM12) - 2015-09-02.tib | Onsite initial backup of LAHC computer by Receivership Team. | 31.7            |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |

## EXHIBIT A

|    | USB Drive - Folder / File<br>(Deliverable)                           | LAHC Source Data<br>Origination                              | ≈ Size<br>(GBs) | DESCRIPTION/BATES<br>NUMBER | Access Instructions   |
|----|--|--|-----------------|-----------------------------|---|
| 84 | Backup Image - Xurui Fan - Latitude E5530 (562H3X1) - 2015-09-23.tib | Onsite initial backup of LAHC computer by Receivership Team. | 49.6            |                             | 1) Drive Password required to open & decrypt the drive.<br>2) Acronis Backup v12.5 Software required to read backup.<br>3) Backup File Password required to open this backup file using Acronis software. |