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

STATE OF LOUISIANA

NUMBER: 641 928

SECTION: 26

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

COST OK \$ State

DEC 02 2015

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DEPUTY CLERK OF COURT

FILED: _____

DEPUTY CLERK

**MOTION TO FILE PAST AND FUTURE INVOICES FOR LEGAL AND CONTRACT SERVICES
UNDER SEAL AND INCORPORATED MEMORANDUM**

NOW INTO COURT, through undersigned counsel comes Billy Bostick, Court-appointed Receiver for Louisiana Health Cooperative, Inc. in Rehabilitation ("LAHC"), who respectfully represents to the Court that LAHC is in the process of discovering and evaluating potential recovery claims that may be filed on behalf of LAHC and for that reason moves the Court to permit the filing of all past and future invoices for legal and contract services for contracts approved by this Court under seal due to the sensitive nature of these proceedings, the need of LAHC to discover and prosecute potential litigation on behalf of LAHC, and the need to preserve attorney-client and/or work product privilege as to information and documentation related to such contemplated litigation.

WHEREFORE LAHC moves this Court to permit the filing under seal of all past and future invoices for legal and contract services for contracts approved by the Court and performed on behalf of LAHC by the Receiver and other contractors and for all other appropriate relief.

Respectfully submitted:

BURGLASS & TANKERSLEY, LLC

Sue Buser

BY: _____

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REC'D C.P.

DEC 10 2015

FILED
EAST BATON ROUGE PARISH LA
2015 DEC 22 PM 4: 08
Michael Caldwell
DEPUTY CLERK OF COURT



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ORDER

Considering the Motion of Louisiana Health Cooperative, Inc. in Rehabilitation to file under seal all past and future invoices for legal and contract services under contracts approved by the Court, and the Court finding the mover is entitled to the relief requested,

IT IS HEREBY ORDERED that any and all past and future invoices for legal services and for contract services performed on behalf of LAHC by the Receiver and other contractors under contracts approved by the Court be and same are to be filed under seal due to the sensitive nature of these proceedings, the need of LAHC to discover and prosecute potential litigation on behalf of LAHC, and the need to preserve attorney-client and/or work product privilege as to information and documentation related to such contemplated litigation.

Baton Rouge, Louisiana, this 10th day of ~~November~~ ^{December}, 2015.

DISTRICT COURT JUDGE DONALD JOHNSON

FILED
EAST BATON ROUGE PARISH, LA
2015 DEC -2 PM 4:02
Megan Carter
DEPUTY CLERK OF COURT