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

#### STATE OF LOUISIANA

NO.: 651,069

**SECTION 22** 

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

### **VERSUS**

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

FILED:	
	DEPUTY CLERK

### AMENDED SUBPOENA DUCES TECUM

TO: Louisiana Department of Insurance Through its custodian of records:

James J. Donelon 1702 N. Third Street Baton Rouge, LA 70802

The Louisiana Department of Insurance ("LDI") is hereby commanded to designate and to make available on the 9<sup>th</sup> day of December, 2020, at 10:00 o'clock a.m. at the offices of Phelps Dunbar, LLP, located at II City Plaza, 400 Convention Street, Suite 1100, in Baton Rouge, Louisiana, Telephone Number: 225-346-0285, one or more officers, directors, or managing agents, or other persons designated to testify on its behalf concerning the production of and identification of the documents specified in Exhibit A.

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This subpoena and deposition may be satisfied by producing certified copies via

secure FTP to Milliman, Inc.'s counsel of record at justine.margolis@dentons.com and

<u>catharine.luo@dentons.com</u> or, if necessary, mailing certified copies to the offices of Dentons

US LLP, Attn: Steven Clark 4520 Main Street, Suite 1100, Kansas City, MO 64111-7700,

unless a different place is established by mutual agreement of the parties hereafter, before

the date set for the deposition in lieu of the designated deponent's appearance at the

deposition.

Should you decline to produce any document otherwise responsive to this subpoena based

upon a claim of privilege, you are ordered to produce, at the place and time designated above, a

log of all documents for which such privilege is claimed, including the basis for the privilege

claimed, a description of said document, the authors and recipients thereof, and the date such

document was created and/or transmitted. Furthermore, to the extent there are documents that

contain communications that you claim are privileged and other communications or writings, you

are ordered to produce the document in a form where all communications that you allege to be

privileged have been redacted.

This subpoena complies with and is issued pursuant to the provisions of Article 1354 et.

seq., and 1463(B) of the Louisiana Code of Civil Procedure.

In accordance with La. C.C.P. Articles 1462 (C) and 1463, each document should be

produced as it is kept in the usual course of business. Parameters for production under this

subpoena duces tecum are contained in Exhibit A attached hereto. Your failure to comply with

this subpoena shall subject you to the penalties prescribed by law.

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By Order of the 19 <sup>th</sup> Judicial Dist	trict Court, Parish of East Baton Rouge, this	day of
 , 2020.		
	DEPUTY CLERK OF COURT	

# REQUESTED ON BEHALF OF MILLIMAN, INC.:

### **Dentons US LLP**

Reid L. Ashinoff (admitted *pro hac vice*)
Justin N. Kattan (admitted *pro hac vice*)
Justine N. Margolis (admitted *pro hac vice*)
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### PHELPS DUNBAR LLP

HARRY ROSENBERG (Bar #11465) Canal Place 365 Canal Street, Suite 2000

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H. ALSTON JOHNSON (Bar # 7293) 400 Convention Street, Suite 1100

Baton Rouge, LA 70302 Telephone: 225-346-0285 Facsimile: 225-381-9197 Email: johnsona@phelps.com

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the above and foregoing has been served upon all counsel of record by e-mail this 19<sup>th</sup> day of November, 2020.

/s/ Harry Rosenberg	
Harry Rosenberg	

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