

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

**BUCK GLOBAL, LLC'S PRELIMINARY WITNESS LIST**

**NOW INTO COURT**, through undersigned counsel, comes Defendant, Buck Global, LLC f/k/a Buck Consultants, LLC ("Buck"), to submit the following Preliminary Witness List pursuant to the Court's September 2020 Case Management Order (the "Order"). The following list of witnesses may be called by Buck at the trial of this matter, by deposition, or otherwise. Buck reserves the right to modify, amend, or supplement this list by May 14, 2021, as provided for in the Order:

1. Harvey Sobel

Principal and Consulting Actuary, Buck Global, LLC  
May be contacted through counsel for Buck.

May testify regarding, among other things, Buck's work for LAHC and facts related to the claims against Buck.

2. Thomas Tomczyk

Former Principal and Consulting Actuary, Buck Global, LLC

May testify regarding, among other things, Buck's work for LAHC and facts related to the claims against Buck.

3. Janet DenBleyker

Principal and Consulting Actuary, Buck Global, LLC  
May be contacted through counsel for Buck.

May testify regarding, among other things, Buck's work for LAHC and facts related to the claims against Buck.

4. Scott Bush

Former Actuary, Buck Global, LLC

May testify regarding, among other things, Buck's work for LAHC and facts related to the claims against Buck.

5. Brandon Conroy

Former employee, Buck Global, LLC

May testify regarding, among other things, Buck's work for LAHC.

6. Ryan MacCartney

Associate, Buck Global, LLC

May be contacted through counsel for Buck.

May testify regarding, among other things, Buck's work for LAHC and facts related to the claims against Buck.

7. Robin Simon

Chief Actuary (Health), Buck Global, LLC

May testify regarding, among other things, Buck's work for LAHC.

8. Billy Bostick and/or other representatives of the Receiver

Receiver of LAHC

May testify concerning the facts and circumstances of this matter.

9. James J. Donelon

Plaintiff

Commissioner of Insurance for the State of Louisiana

May testify concerning the facts and circumstances of this matter.

10. Warner L. Thomas

Director, LAHC

May testify concerning the facts and circumstances of this matter, including but not limited to LAHC managerial issues.

11. Terry Schilling

Chief Executive Officer, LAHC

May testify concerning the facts and circumstances of this matter, including but not limited to LAHC managerial issues.

12. Patrick Powers

Chief Financial Officer and Treasurer, LAHC

May testify concerning the facts and circumstances of this matter, including but not limited to LAHC managerial issues and actuarial issues, including premium rates and financial projections.

13. Charles Calvi

Chief Marketing Officer; Executive VP, LAHC

May testify concerning the facts and circumstances of this matter, including but not limited to LAHC managerial issues.

14. George Cromer

President/CEO, LAHC

May testify concerning the facts and circumstances of this matter, including but not limited to LAHC managerial issues.

15. Mark Gentry

Project Manager, LAHC

May testify concerning the facts and circumstances of this matter, including but not limited to LAHC managerial issues.

16. Scott Posecai

Director, LAHC

May testify concerning the facts and circumstances of this matter, including but not limited to LAHC managerial issues.

17. Patrick Quinlan

Director, LAHC

May testify concerning the facts and circumstances of this matter, including but not limited to LAHC managerial issues.

18. Peter November

Director, LAHC

May testify concerning the facts and circumstances of this matter, including but not limited to LAHC managerial issues.

19. Michael Hulefeld

Director, LAHC

May testify concerning the facts and circumstances of this matter, including but not limited to LAHC managerial issues.

20. John Welborn

Chief Strategy Officer, LAHC

May testify concerning the facts and circumstances of this matter, including but not limited to LAHC managerial issues.

21. Tommy Teague

General Counsel and VP of Operations, Information Technology and Provider Relations, LAHC

May testify concerning the facts and circumstances of this matter, including but not limited to LAHC managerial issues.

22. Sylvia Theriot

Director of Finance, LAHC

May testify concerning the facts and circumstances of this matter, including but not limited to LAHC managerial and financial issues.

23. Shannon Schwartz

Executive Assistant and Assistant to HR, LAHC

May testify concerning the facts and circumstances of this matter, including but not limited to LAHC managerial issues.

24. Tony Cimino

Director of Sales and Marketing, LAHC

May testify concerning the facts and circumstances of this matter, including but not limited to LAHC managerial issues.

25. Richard E. Swift

Acting CFO, LAHC

May testify concerning the facts and circumstances of this matter, including but not limited to LAHC managerial issues.

26. Jennifer Pinkens

Director of Operations, LAHC

May testify concerning the facts and circumstances of this matter, including but not limited to LAHC managerial issues.

27. Jeremy Murphy

Compliance Officer, LAHC

May testify concerning the facts and circumstances of this matter, including but not limited to LAHC managerial issues.

28. Ryan Germain

HR Director, LAHC

May testify concerning the facts and circumstances of this matter, including but not limited to LAHC managerial issues.

29. Lauren Yazbeck

Administrative Assistant, LAHC

May testify concerning the facts and circumstances of this matter, including but not limited to LAHC managerial issues.

30. Nikki Cromer

Administrative Assistant, LAHC

May testify concerning the facts and circumstances of this matter, including but not limited to LAHC managerial issues.

31. Xurui Fan

Financial Analyst, LAHC

May testify concerning the facts and circumstances of this matter, including but not limited to LAHC managerial and financial issues.

32. Julia Peek

Junior Financial Assistant, LAHC

May testify concerning the facts and circumstances of this matter, including but not limited to LAHC managerial and financial issues.

33. Other representative(s) of LAHC yet to be identified

34. Corporate representative(s) of Beam Partners, LLC

35. Corporate representative(s) of Group Resources Incorporated (“GRI”)

36. Corporate representative(s) of CGI Technologies and Solutions, Inc.

37. Corporate representative(s) of Louisiana Department of Insurance

38. Rodney E. Friedy

Life & Health Actuary, Louisiana Department of Insurance

May testify concerning the facts and circumstances of this matter, including but not limited to LAHC managerial and actuarial issues.

39. Richard N. Piazza

Chief Actuary, Louisiana Department of Insurance

May testify concerning the facts and circumstances of this matter, including but not limited to LAHC managerial and actuarial issues.

40. Any other Actuary with relevant information, Louisiana Department of Insurance

41. Andy Willoughby

Chief Operating Officer, GRI

May testify concerning the facts and circumstances of this matter, including but not limited to LAHC managerial and third party administrator issues.

42. Thomas S. Byrd

President and Chief Executive Officer, GRI

May testify concerning the facts and circumstances of this matter, including but not limited to LAHC managerial and third party administrator issues.

43. Sheila Autry

Director of Claims, GRI

May testify concerning the facts and circumstances of this matter, including but not limited to LAHC managerial and third party administrator issues.

44. Scott Neice and/or other representative of CGI Technologies and Solutions, Inc.

May testify concerning the facts and circumstances of this matter, including but not limited to LAHC managerial and third party administrator issues.

45. Corporate representative(s) of Milliman, Inc.

46. Milliman, Inc.'s employees who performed any actuarial work for LAHC.

47. Rachel Killian

Principal & Consulting Actuary, Milliman, Inc.

May testify regarding, among other things, Milliman's work for LAHC and other actuarial issues.

48. Andy Large

Assistant Project Manager, Milliman, Inc.

May testify regarding, among other things, Milliman's work for LAHC and other actuarial issues.

49. Brandon Odell

Actuarial Analyst, Milliman, Inc.

May testify regarding, among other things, Milliman's work for LAHC and other actuarial issues.

50. Patrick Stone

Actuarial Analyst, Milliman, Inc.

May testify regarding, among other things, Milliman's work for LAHC and other actuarial issues.

51. Mike Sturm

External Peer Review, Milliman, Inc.

May testify regarding, among other things, Milliman's work for LAHC and other actuarial issues.

52. Gary Brace

Peer Review; Provider Network Analysis, Milliman, Inc.

May testify regarding, among other things, Milliman's work for LAHC and other actuarial issues.

53. David Hayes

Peer Review, Milliman, Inc.

May testify regarding, among other things, Milliman's work for LAHC and other actuarial issues.

54. Emily Janke

2014 Provider Network Analysis, Milliman, Inc.

May testify regarding, among other things, Milliman's work for LAHC and other actuarial issues.

55. Amanda Lorenz

Background Technical Work, Milliman, Inc.

May testify regarding, among other things, Milliman's work for LAHC and other actuarial issues.

56. Courtney White

Principal & Consulting Actuary, Milliman, Inc.

May testify regarding, among other things, Milliman's work for LAHC and other actuarial issues.

57. Michael Thomas

Associate Actuary, Milliman, Inc.

May testify regarding, among other things, Milliman's work for LAHC and other actuarial issues.

58. Harvey Korey, or other representatives of Louisiana Department of Insurance

May testify regarding, among other things, LAHC's managerial issues.

59. Kevin Kendrick

CMS/CO-OP Team

May testify concerning the facts and circumstances of this matter, including but not limited to, the CMS loan and relationship with LAHC.

60. Joan Peterson

CO-OP Program Account Manager, U.S. Department of Health and Human Services, Centers for Medicare & Medicaid Services ("CMS")

May testify concerning the facts and circumstances of this matter, including but not limited to, the CMS loan and relationship with LAHC.

61. Kevin Counihan

Chief Executive Officer, Health Insurance Marketplaces, CMS

May testify concerning the facts and circumstances of this matter, including but not limited to, the CMS loan and relationship with LAHC.

62. Any witness needed to authenticate or address CMS' use of LAHC's Co-Op Semi-Annual Progress Reports, including the report filed in April 2015.

63. David Dillon

Lewis & Ellis, Actuaries and Consultants

May testify regarding, among other things, Buck's actuarial work for LAHC and other actuarial issues.

64. Brian Stentz

Lewis & Ellis, Actuaries and Consultants

May regarding, among other things, Buck's actuarial work for LAHC and other actuarial issues.

65. Corporate representative of Lewis & Ellis, Inc.

66. Any witness listed by any other party to this lawsuit.

67. Any witness deposed in this lawsuit.

68. Any witness needed to authenticate or address documents or electronic data.

69. Any witness needed to provide impeachment or rebuttal testimony.

70. Expert witnesses to be identified in accordance with the Order.

Respectfully submitted,

/s/ James A. Brown

James A. Brown (La. Bar #14101)

Sheri L. Corales (La. Bar #37643)

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*Attorneys for Buck Global, LLC*

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on March 15, 2021, a copy of the above and foregoing has been served upon all known counsel of record by fax or electronic mail.

/s/ James A. Brown