

JAMES J. DONELON, COMMISSIONER OF INSURANCE FOR THE STATE OF LOUISIANA, IN HIS CAPACITY AS REHABILITATOR OF LOUISIANA HEALTH COOPERATIVE, INC.	:	SUIT NO.: 651,069 SECTION: 22
	:	
	:	19 TH JUDICIAL DISTRICT COURT
	:	
versus	:	PARISH OF EAST BATON ROUGE
	:	
CGI TECHNOLOGIES AND SOLUTIONS, INC., <i>ET AL.</i>	:	STATE OF LOUISIANA

**MOTION FOR LEAVE TO FILE PLAINTIFF’S
FIFTH AMENDED PETITION FOR DAMAGES AND REQUEST FOR JURY TRIAL
AND INCORPORATED MEMORANDUM IN SUPPORT**

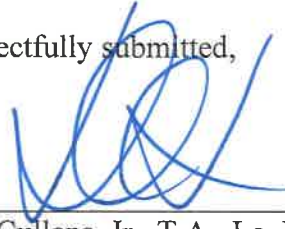
NOW INTO COURT, through undersigned counsel, comes Plaintiff, James J. Donelon, Commissioner of Insurance for the State of Louisiana in his capacity as Rehabilitator of Louisiana Health Cooperative, Inc. (“LAHC”), through his duly appointed Receiver, Billy Bostick (“Plaintiff” or the “Commissioner”), who respectfully moves this Honorable Court for leave to file the attached Fifth Amended Petition for Damages and Request for Jury Trial (“Fifth Amended Petition”), pursuant to the court’s applicable Case Management Schedule (“CMS”), Louisiana Code of Civil Procedure article 1151, and Local Rule 9.9(g)(4).

Plaintiff is removing all claims against all directors and officers and their insurers from this lawsuit, along with all other previously named defendants who have resolved Plaintiffs’ claims against them. Additionally, Plaintiff is amending and supplementing his factual allegations against defendants, asserting new claims against defendants, and adding the insurer of GRI as a defendant pursuant to Louisiana’s Direct Action Statute. Plaintiff therefore respectfully moves for leave of Court to file the attached, Fifth Amended Petition, which specifically supplements and amends all of Plaintiff’s previously filed Petitions herein.

The filing of this Fifth Amended Petition will not delay this case or cause any undue hardship whatsoever on the defendants. Discovery is in the initial stages. No depositions have yet been taken. The CMS signed by this Honorable Court on September 14, 2020, sets an April 1, 2021, deadline to amend pleadings. No trial date has been set.

WHEREFORE, Plaintiff prays that this Motion for Leave be granted, and that his Fifth Amended Petition for Damages be filed without delay.

Respectfully submitted,



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CERTIFICATE OF SERVICE

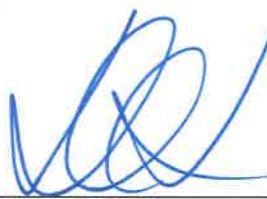
I hereby certify that a true copy of the foregoing has been furnished via e-mail to all counsel of record as follows, this 1st day of April, 2021, in Baton Rouge, Louisiana.

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ORDER

Considering Plaintiff’s Motion for Leave to File Fifth Amended Petition for Damages and Request for Jury Trial (with Incorporated Memorandum):

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that the Motion for Leave is **GRANTED**, and the Plaintiff’s Fifth Amended Petition for Damages and Request for Jury Trial be deemed filed as of April 1, 2021.

SIGNED this ____ day of April, 2021, at Baton Rouge, Louisiana.

HONORABLE JUDGE TIMOTHY KELLEY
19th JUDICIAL DISTRICT COURT

**PLEASE PROVIDE NOTICE
PURSUANT TO LSA–CCP ART. 1913**