

19<sup>th</sup> JUDICIAL DISTRICT COURT FOR THE PARISH OF EAST BATON ROUGE

STATE OF LOUISIANA

SUIT NO. C-651069

SECTION 22

JAMES J. DONELON, COMMISSIONER OF INSURANCE  
FOR THE STATE OF LOUISIANA, ET AL.

VERSUS

GROUP RESOURCES INCORPORATED, et al

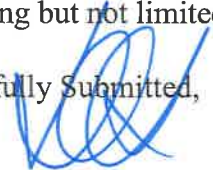
FILED: \_\_\_\_\_

DEPUTY CLERK

**PLAINTIFF'S MOTION AND ORDER TO DISMISS**  
**DEFENDANTS GROUP RESOURCES INCORPORATED**  
**AND IRONSHORE SPECIALTY INSURANCE COMPANY**

NOW INTO COURT, through undersigned counsel, comes James J. Donelon, Commissioner of Insurance for the State of Louisiana in his capacity as Rehabilitator of Louisiana Health Cooperative, Inc., through its duly appointed Receiver, Billy Bostick, Plaintiff ("Plaintiff" or the "Receiver"), who respectfully moves this Honorable Court for the entry of an Order dismissing his claims against Defendants, Group Resources Incorporated ("GRI") and Ironshore Specialty Insurance Company ("Ironshore"), in connection with this lawsuit, with prejudice and with each party to bear its own cost, given that GRI, Ironshore, and Plaintiff have reached a mutually acceptable compromise that has been approved by an Order signed by the Receivership Court on September 23, 2021, in the matter entitled *James J. Donelon, Commissioner of Insurance for the State of Louisiana v. Louisiana Health Cooperative, Inc.*, Case No. 641,928, (the "Rehabilitation Proceeding"), the 19th Judicial District Court for the Parish of East Baton Rouge (attached Exhibit A). The Receiver specifically does not dismiss and reserves all claims against all other defendants not previously dismissed, including but not limited to Milliman, Inc.

Respectfully Submitted,



\_\_\_\_\_  
J. E. Cullens, Jr. T.A., La. Bar #23011  
Edward J. Walters, Jr., La. Bar #13214  
Andree M. Cullens, La. Bar #23212  
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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing pleading has been delivered to all counsel of record, by depositing a copy of same in the United States mail, first class postage prepaid at their last known address of record, or by electronic mail, or by ECF Notice, or by facsimile transmission or by hand delivery this 20<sup>th</sup> day of October, 2021.

  
\_\_\_\_\_  
J.E. OWENS, JR.

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.

FILED: \_\_\_\_\_

\_\_\_\_\_  
DEPUTY CLERK

ORDER

Considering the foregoing Motion Requesting Approval of Settlement of Claims Involving Group Resources, Inc. and its insurer, Ironshore Specialty Insurance Company, defendant in 19<sup>th</sup> Judicial District Court Case Number 651 069, Section 22, and the Court finding that the parties are entitled to the relief granted herein:

**IT IS ORDERED, ADJUDGED AND DECREED** that the Motion Requesting Approval of Settlement of Claims Involving Group Resources, Inc. ("GRI") and its insurer, Ironshore Specialty Insurance Company be and same hereby is GRANTED.

**IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that the proposed settlement with Group Resources, Inc. ("GRI") and its insurer, Ironshore Specialty Insurance Company, be and same hereby is APPROVED.

**IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that the Receiver for Louisiana Health Cooperative, Inc. in Rehabilitation ("LAHC") be and hereby is authorized to enter into the proposed settlement agreement with Group Resources, Inc. ("GRI") and its insurer, Ironshore Specialty Insurance Company, as reflected in the proposed agreement attached as **Exhibit A**, and to sign such documents, to take such actions as may be required to accomplish same, and to implement same, in the sole discretion of the Receiver.

**IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that the settlement is fair and equitable to all interested parties and claimants (including all creditors of LAHC); that the Receiver has specific authority to release all claims pursuant to the terms of the Settlement Agreement and to dismiss the claims asserted against the Group Resources, Inc. ("GRI") and its insurer, Ironshore Specialty Insurance Company in the pending lawsuit with prejudice; that the Receiver has specific authority to execute the Settlement Agreement; that all creditors,




claimants, and interested persons of the LAHC estate are and will be bound by the Settlement Agreement, and that the claims of LAHC estate creditors against Group Resources, Inc. ("GRI") and its insurer, Ironshore Specialty Insurance Company, except direct claims, if any, which the Receiver is unable by assignment or operation of law to assert, and except as reserved in the proposed settlement agreement, be and hereby are deemed released as a result of this Court's finding of the fairness of the settlement and this Court's approval of the settlement.

**IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that notice of this motion and order and the Court's ruling be given by posting a copy of this motion and order on the Louisiana Department of Insurance website at [www.lda.la.gov](http://www.lda.la.gov) ; Office Directory; Receivership; Domestic Receivers in receivership-Open; Louisiana Health Cooperative, Inc.; Receivership Pleadings, and that such notice shall be deemed sufficient notice to all interested persons or entities.

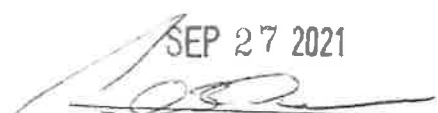
**IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that the motion of the Receiver to certify this judgment as a final judgment pursuant to Louisiana Code of Civil Procedure article 1915 be and hereby is granted and this judgment is certified as a final judgment for purposes of appeal.

The Court, in accordance with Louisiana Civil Code Article 1915, designates this as a final judgment by the Court after an express determination that there is no just reason for delay since the judgment rendered by the Court herein dismisses all claims in the recovery action as to Group Resources, Inc. ("GRI") and its insurer, Ironshore Specialty Insurance Company with prejudice.

Baton Rouge, Louisiana, this 23 day of September, 2021.

  
DISTRICT COURT JUDGE RICHARD "CHIP" MOORE, III

CERTIFIED TRUE AND  
CORRECT COPY

  
SEP 27 2021  
East Baton Rouge Parish  
Deputy Clerk of Court

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the above and foregoing document has been forwarded via email to the email addresses provided, to the following:

J. E. Cullens, Jr.  
Walters, Papillion, Thomas, Cullens, LLC  
Counsel for James J. Donelon, Commissioner of Insurance for the State of Louisiana in his  
capacity as Rehabilitator of Louisiana Health Cooperative, Inc.  
[Cullensj@lawbr.net](mailto:Cullensj@lawbr.net)

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Counsel for Ironshore Specialty Insurance Company  
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On this 17th day of September, 2021.



Sue Buser

19<sup>th</sup> JUDICIAL DISTRICT COURT FOR THE PARISH OF EAST BATON ROUGE

STATE OF LOUISIANA

SUIT NO. C-651069

SECTION 22

JAMES J. DONELON, COMMISSIONER OF INSURANCE  
FOR THE STATE OF LOUISIANA, ET AL.

VERSUS

GROUP RESOURCES INCORPORATED, et al

FILED: \_\_\_\_\_

DEPUTY CLERK

**ORDER DIMISSING**  
**DEFENDANTS, GROUP RESOURCES INCORPORATED AND**  
**IRONSHORE SPECIALTY INSURANCE COMPANY,**  
**WITH PREJUDICE**

Considering the foregoing Motion for Dismissal With Prejudice as to Group Resources Incorporated (“GRI”) and Ironshore Specialty Insurance Company (“Ironshore”):

**IT IS HEREBY ORDERED, ADJUDGED, AND DECREED** that the motion is **GRANTED**, and that all rights, claims and causes of action asserted against Group Resources Incorporated (“GRI”) and Ironshore Specialty Insurance Company (“Ironshore”), in the above-captioned matter are hereby **DISMISSED WITH PREJUDICE**, with each party to bear its own respective costs, expenses and attorneys’ fees. Plaintiff’s claims against all other defendants not previously dismissed herein are expressly reserved.

This \_\_\_\_\_ day of October, 2021 in Baton Rouge, Louisiana.

\_\_\_\_\_  
HON. JUDGE TIMOTHY E. KELLEY  
19<sup>th</sup> Judicial District Court  
Parish of East Baton Rouge