

**BEFORE THE COMMISSIONER OF INSURANCE  
FOR THE STATE OF LOUISIANA**

IN RE: LOUISIANA HEALTH SERVICE & INDEMNITY COMPANY D/B/A BLUE  
CROSS AND BLUE SHIELD OF LOUISIANA

PLAN OF REORGANIZATION REGARDING THE CONVERSION FROM A  
MUTUAL INSURANCE COMPANY TO A STOCK INSURANCE COMPANY

CAUSE NO. \_\_\_\_\_

**PETITION FOR INTERVENTION**

NOW INTO COURT, comes Intervenors, Henry W. Kinney, individually and as counsel for Kinney, Ellinghausen & DeShazo, Accounting Plus Solutions, L.L.C, Pamela S. Aaron, Robert E. Birtel, Brenda Chase, Mike Chase, Kerrie B. Connella, Tammy L. DeBlieux, Sarah E. Patterson Dougherty, Wendy G. Elmore, Martha C. Foy, William T. Foy, Travis M. Foy, Sonya J. Gatchell, David Giles, Teresa Giles, Riley Hagan, III, (Charles) Anthony Hubley, Benjamin C. McDonald, Kimberly Y. Mitchell, Sherry Mockler, Rebekah N. Burns Peterson, Mary V. Pyles, Lorna B. Reed, Glenn Young, Judith Young, and Peter Z. Vetter, all of whom are members or policy holders of Louisiana Health Service & Indemnity Company, d/b/a Blue Cross and Blue Shield of Louisiana (“BCBSLA”), who hereby aver, in accordance with Chapter 11. Rule Number 1-Rules of Practice and Procedure before the Commissioner of Insurance, §1115, as follows:

I.

Petitioner, Henry W. Kinney, individually, and as counsel for above other intervenors, Kinney, Ellinghausen & DeShazo, Accounting Plus Solutions, L.L.C, Pamela S. Aaron, Brenda Chase, Mike Chase, Kerrie B. Connella, Robert E. Birtel, Tammy L. DeBlieux, Sarah E. Patterson Dougherty, Wendy G. Elmore, Martha C. Foy, William T. Foy, Travis M. Foy, Sonya J. Gatchell, David Giles, Teresa Giles, Riley Hagan, III, (Charles) Anthony Hubley, Benjamin C. McDonald,

Kimberly Y. Mitchell, Rebekah N. Burns Peterson, Mary V. Pyles, Lorna B. Reed, Glenn Young, Judith Young, and Peter Z. Vetter (collectively referred to hereafter as “Petitioners”), are all members or policy holders of BCBSLA. Please see **Exhibit “A”** for list of intervenors and their addresses.

## II.

Petitioners move the Commissioner of Insurance and Charles B. Hansberry, III, the Hearing Officer in this application for demutualization filed by BCBSLA, now scheduled for hearing on February 14, 2024, for leave to file the Petition for Intervention (the “Petition”) pursuant to §1115 of Rule Number 1 – Rules of Practice and Procedure before the Commissioner of Insurance.

## III.

Petitioners, as members of BCBSLA, are owners of that entity. There are no other persons or entities that have any interest of any kind in BCBSLA. The Articles of Incorporation of BCBSLA are plead herein as if copied in extenso.

## IV.

BCBSLA has filed an application to demutualize in order to become a stock company. In the event that the plan of demutualization is granted by the Commissioner of Insurance, Petitioners will forever lose their right to control BCBSLA as a nonprofit mutual insurance company. As of this date, all Petitioners, and other members of BCBSLA, have total control over the board of directors of BCBSLA and, by that control, have unfettered control of BCBSLA and further have the control to amend the articles of incorporation of BCBSLA. In other words, Petitioners and other members own and control BCBSLA.

V.

Petitioners are directly and immediately affected by the demutualization proceedings and will be affected by the application of demutualization. Further, to the extent necessary by scheduling the sale proceeding now, even though the demutualization application is still pending, and despite the fact that no member vote has taken place, petitioners request intervention in that proceeding also. There are no persons or entities that are more affected by this plan and potential sale than Petitioners.

VI.

At this time, and subject to further discovery and pleadings and appearances of any other party to the demutualization, Petitioners do not intend to introduce any evidence other than evidence in the possession of BCBSLA and other parties. However, Petitioners reserve their right to introduce other evidence as discovery as these proceedings progress.

VII.

Petitioners will provide copies of this petition to the Commissioner and BCBSLA upon filing. These are the only parties to this matter.

VIII.

Petitioners request intervention with full status, with the same procedural rights as BCBSLA, and with the same reasonable conditions that apply to BCBSLA. Petitioners will not broaden the issues before the Commissioner.

**WHEREFORE**, Petitioners, Henry W. Kinney, individually and as counsel for Kinney, Ellinghausen & DeShazo, Accounting Plus Solutions, L.L.C, Pamela S. Aaron, Robert E. Birtel, Brenda Chase, Mike Chase, Kerrie B. Connella, Tammy L. DeBlieux, Sarah E. Patterson Dougherty, Wendy G. Elmore, Martha C. Foy, William T. Foy, Travis M. Foy, Sonya J. Gatchell, David Giles, Teresa Giles, Riley Hagan, III, (Charles) Anthony Hubley, Benjamin C. McDonald, Kimberly Y. Mitchell, Rebekah N. Burns Peterson, Mary V. Pyles, Lorna B. Reed, Glenn Young, Judith Young, and Peter Z. Vetter, pray for an order from either the Commissioner of Insurance or Charles B. Hansberry, III, the hearing officer, providing for the Intervention of Petitioners.

**RESPECTFULLY SUBMITTED:  
KINNEY, ELLINGHAUSEN & DESHAZO**



**HENRY W. KINNEY (#7410)**  
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Fax: 504.383.8742

## CERTIFICATE OF SERVICE

**I HEREBY CERTIFY** that on this 16<sup>th</sup> day of January 2024, a copy of the above and foregoing has been sent via electronic mail to the following:

Charles B. Hansberry, III  
*Louisiana Department of Insurance, Hearing Officer*  
1702 N. Third Street  
Baton Rouge, LA 70802  
charles.hansberry@ldi.la.gov

David Caldwell  
*Louisiana Department of Insurance, Executive Counsel*  
1702 N. Third Street  
Baton Rouge, LA 70802  
david.caldwell@ldi.la.gov

**KINNEY, ELLINGHAUSEN & DESHAZO:**



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**BEFORE THE COMMISSIONER OF INSURANCE  
FOR THE STATE OF LOUISIANA**

IN RE: LOUISIANA HEALTH SERVICE & INDEMNITY COMPANY D/B/A BLUE  
CROSS AND BLUE SHIELD OF LOUISIANA PLAN OF REORGANIZATION  
REGARDING THE CONVERSION FROM A MUTUAL INSURANCE COMPANY  
TO A STOCK INSURANCE COMPANY

CAUSE NO. \_\_\_\_\_

**ORDER**

Considering the above and foregoing *Petition for Intervention*:

IT IS HEREBY ORDERED that the *Petition for Intervention* filed by Intervenors, Henry W. Kinney, individually and as counsel for Kinney, Ellinghausen & DeShazo, Accounting Plus Solutions, L.L.C, Pamela S. Aaron, Robert E. Birtel, Brenda Chase, Mike Chase, Kerrie B. Connella, Tammy L. DeBlieux, Sarah E. Patterson Dougherty, Wendy G. Elmore, Martha C. Foy, William T. Foy, Travis M. Foy, Sonya J. Gatchell, David Giles, Teresa Giles, Riley Hagan, III, (Charles) Anthony Hubley, Benjamin C. McDonald, Kimberly Y. Mitchell, Rebekah N. Burns Peterson, Mary V. Pyles, Lorna B. Reed, Glenn Young, Judith Young, and Peter Z. Vetter, is GRANTED, and they are granted leave to intervene in the above-captioned matter.

Baton Rouge, Louisiana this \_\_\_\_\_ day of January 2024.

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Charles B. Hansberry, III, Hearing Officer

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**LIST OF INTERVENORS**

1. Henry W. Kinney  
6536 LaSalle Ave.  
Baton Rouge, LA 70806
2. Kinney, Ellinghausen & DeShazo  
1250 Poydras St, Suite 2450  
New Orleans, LA 70113
3. Accounting Plus Solutions, L.L.C.  
425 Ashley Ridge Blvd., Suite 235  
Shreveport, Louisiana 71106
4. Pamela S. Aaron  
870 Willow Dr.  
Shreveport, LA 71118
5. Robert E. Birtel  
4501 Orleans Blvd.  
Jefferson, LA 70121
6. Brenda Chase  
51022 Allen Dr.  
Loranger, LA 70446
7. Mike Chase  
51022 Allen Dr.  
Loranger, LA 70446
8. Kerrie B. Connella  
9570 Wallace Lake Rd.  
Shreveport, LA 71106

9. Tammy L. DeBlieux  
3232 Stockwell Road  
Bossier City, LA 71111
10. Sarah E. Patterson Dougherty  
533 Meadowbrook Lane  
Shreveport, LA 71105
11. Wendy G. Elmore  
8772 Beavers Nest Dr.  
Shreveport, LA 71129
12. Martha C. Foy  
2910 Covington Circle  
Shreveport, Louisiana 71106
13. Willlliam T. Foy, Jr.  
2910 Covington Circle  
Shreveport, Louisiana 71106
14. Travis M. Foy  
1954 Crossvine Lane  
Shreveport, Louisiana 71106
15. Sonya J. Gatchell  
1302 Cove St.  
Bossier City, LA 71112
16. David Giles  
5218 La Paix Dr.  
Sulphur, Louisiana 70665
17. Teresa Giles  
5218 La Paix Dr.  
Sulphur, Louisiana 70665
18. Riley Hagan, III  
18951 Santa Maria Drive  
Baton Rouge, LA 70809
19. (Charles) Anthony Hubley  
615 Ockley Drive  
Shreveport, LA 71106



20. Benjamin C. McDonald  
640 Huron St.  
Shreveport, LA 71106
21. Kimberly Y. Mitchell  
4710 Roberts Circle  
Shreveport, LA 71109
22. Rebekah N. Burns Peterson  
822 Sewanee Place  
Shreveport, LA 71105
23. Mary V. Pyles  
184 Arthur Avenue  
Shreveport, LA 71105
24. Lorna B. Reed  
264 County Road 471  
De Berry, TX 75639
25. Glenn Young  
5261 Highland Rd.  
No. 193  
Baton Rouge, LA 70808
26. Judith Young  
5261 Highland Rd.  
No. 193  
Baton Rouge, LA 70808
27. Peter Z. Vetter  
5019 General Polk Dr.  
Bossier City, LA 71112