

**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. _____

REQUEST FOR PRODUCTION OF DOCUMENTS
ON BEHALF OF INTERVENOR, HENRY W. KINNEY, ET. AL.
TO BLUE CROSS AND BLUE SHIELD OF LOUISIANA

NOW INTO COURT, comes Intervenors in the above-referenced action, 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, 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 in accordance with the applicable provisions of the Louisiana Code of Civil Procedure, propounds the following Requests for Production of Documents upon Louisiana Health and Indemnity Company d/b/a Blue Cross and Blue Shield of Louisiana, to be answered separately and fully in writing and under oath within the delays allowed by the Scheduling Order put forth by the Hearing Officer for the Louisiana Department of Insurance.

INSTRUCTIONS AND DEFINITIONS

1. “Documents” will be construed broadly to include the recordation of information in any form. It includes without limitation any letters, correspondence, telegrams, memoranda, records, books of account, ledgers, accounts, balance sheets, checks, canceled checks, check books, deposit slips, bank statements, certificates of deposit, records of money market accounts, records of checking accounts, records of savings accounts, journals, minutes, contracts, records of telephone or personal conversations or conferences, interoffice communications, microfilm, electronically stored information, audio or video tape recordings or other recordings, computer disks or other software, e-mails, text messages, instant messages, or other electronic records, reports, analyses, work sheets, vouchers, newspaper clippings, desk calendars, appointment books, diaries, telephone toll records, travel vouchers, receipts for travel, hotel and air fare invoices, and all writings or other recordings of any nature. Where originals are not available, copies of such documents must be produced.

2. “All documents” will mean every document within a stated category that is within your possession, custody, or control, or which can be designated or located through the use of reasonable diligence. A document is within your possession, custody or control if you have the ability to require production of the document from someone else, whether because of stock ownership, an employment relationship, a contract, or otherwise.

3. If you cannot answer a request for production of documents in full, after exercising due diligence to secure the full information or knowledge you have concerning the request for production of documents, so state and answer the remaining portion stating whatever knowledge or information you have concerning the remaining portion and detailing your attempt to secure the unknown information.

4. The terms “BCBSLA,” “you,” and ““your” refer to Louisiana Health Service & Indemnity Company d/b/a Blue Cross and Blue Shield of Louisiana, as well as its directors, officers, employees, attorneys, agents, representatives, predecessors, successors, parent or related entities, components and divisions, either United States or foreign, and its franchisees and licensees.
5. If you assert a claim of privilege with respect to any responsive document, and withhold the responsive document from production, please state:
 - a. The nature of the privilege claimed and the basis for its application to the document.
 - b. The author, date, recipients, and means of transmission of the document; and
 - c. Any other facts relied on to establish that the privilege has been asserted properly.
6. “And” and “or” will be construed conjunctively or disjunctively as necessary to make the request inclusive rather than exclusive.
7. The terms “relating to” or “related to” mean commenting on, including, concerning, containing, regarding, discussing, reflecting, referencing, pertaining to, relevant to, used in connection with, or evidencing, and should be construed in the broadest sense of the word.
8. Provide your responses to each specific request. List the number of the request in your response.

INTERROGATORIES

INTERROGATORY NO. 1:

Please identify who the owners are of Blue Cross and Blue Shield of Louisiana.

INTERROGATORY NO. 2:

Please describe the current amount of surplus that BCBSLA has currently.

INTERROGATORY NO. 3:

Please describe why BCBSLA maintains a surplus.

INTERROGATORY NO. 4:

Please describe the equitable value of the proposed reorganized company.

INTERROGATORY NO. 5:

Please describe the assumptions that were provided to Deloitte Consulting LLP, Chaffe & Associates, Cain Brothers or any other entity engaged by BCBSLA as a consultant in this matter.

INTERROGATORY NO. 6:

Please describe any provisions in the plan of reorganization to reduce future premiums for its policy holders.

INTERROGATORY NO. 7:

Please describe in detail the specific benefit to each member of BCBSLA that will be provided by The Accelerate Louisiana Initiative, Inc.

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1:

All documents in the category of Chaffe & Associates from 2019 to date. Including any correspondence, notes or reports from Chaffe & Associates.

REQUEST FOR PRODUCTION NO. 2:

Please produce all documents in the category of Deloitte Consulting, LLP from 2019 to date. Including any correspondence, notes or reports from Deloitte Consulting, LLP.

REQUEST FOR PRODUCTION NO. 3:

Please produce all documents in the category of Cain Brothers from 2019 to date. Including any correspondence, notes or reports from Cain Brothers.

REQUEST FOR PRODUCTION NO. 4:

Please produce minutes of all meetings of the Board of BCBSLA where the sale to Elevance Health, Inc. or the transfer to The Accelerate Louisiana Initiative, Inc. was discussed from 2019 to date.

REQUEST FOR PRODUCTION NO. 5:

Please produce year-end financial data, including tax returns, from 2018 to date.

REQUEST FOR PRODUCTION NO. 6:

Please produce all documents that involve a payment, or consideration, to a board member or employee of BCBSLA based on the proposed sale to Elevance Health, Inc. or sale to any entity.

This should include all documents involving payment to board members for serving on the Advisory Board of the reorganized BCBSLA and employee agreements.

REQUEST FOR PRODUCTION NO. 7:

Please produce all documents that support the matters involved in Paragraphs II, III, IV, V and VI of your application to the Commissioner for demutualization. List the paragraph to which it is responsive.

REQUEST FOR PRODUCTION NO. 8:

Please produce all documents involving capital needs of BCBSLA from January 1, 2018, to date.

REQUEST FOR PRODUCTION NO. 9:

Please produce all documents involving BCBSLA's inability to expand existing business from January 1, 2018, to date.

REQUEST FOR PRODUCTION NO. 10:

Please produce any reports provided to the Board of BCBSLA by staff, or employees, of BCBSLA involving the efficiency or operations of BCBSLA from September 1, 2023, to date, specifically documents that would evaluate the operations of BCBSLA.

[Signature found on following page.]

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



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 24th day of January 2024, a copy of the above and foregoing has been sent via electronic mail to all counsel of record in the proceedings.

KINNEY, ELLINGHAUSEN & DESHAZO:



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