

**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. _____

INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS
ON BEHALF OF INTERVENOR, HENRY W. KINNEY ET. AL.
TO ELEVANCE HEALTH, INC.

NOW INTO COURT, comes Intervenor 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 Elevance Health, Inc., 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 “Elevance,” “you,” and “your” refer to Elevance Health, Inc., including any subsidiaries or affiliates, 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. This includes any previous corporate entity that may have operated under another name, such as Anthem, Inc.

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:

Has Elevance had its Star Rating reduced by the Center for Medicare Services in the last two years and, if so, identify the date of the reduction and describe the reduction.

INTERROGATORY NO. 2:

Please list the fines that Elevance has incurred in the last ten years. Please identify by State, reasons for fine and amount of fine.

INTERROGATORY NO. 3:

Please list the current rating that BCBSLA has been given by CMS for 2023.

INTERROGATORY NO. 4:

Please describe all meetings that Elevance has had with Timothy Temple.

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1:

Please produce all documents involving the plan of demutualization of Anthem, Inc., which occurred on or about 2002.

REQUEST FOR PRODUCTION NO. 2:

Please produce any documents that values the reorganized BCBSLA after the demutualization.

[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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