

**BEFORE THE COMMISSIONER OF INSURANCE
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**

**BLUE CROSS'S INTERROGATORIES AND
REQUESTS FOR PRODUCTION OF DOCUMENTS**

To: Lorna B. Reed
c/o attorney of record
Henry W. Kinney
1250 Poydras St., Suite 2450
New Orleans, LA 70113
hkinney@kinneylaw.com

INTERROGATORIES

1. Please identify every person, along with their last known contact information, who provided information or contributed in any manner to your responses to these Interrogatories and Requests for Production of Documents.
2. Please list all facts that support your contentions in Paragraph I of your Petition for Intervention that the Plan of Reorganization violates La. R.S. 22:236.4. Please do not simply rely upon or restate the allegations of your petition for intervention.
3. Please list all facts that support your contentions in Paragraph III of your Petition for Intervention that the "there are no other persons or entities that have any interest of any kind in BCBSLA." Please do not simply rely upon or restate the allegations of your petition for intervention.
4. Please list all facts that support your contentions in Paragraph IV of your Petition for Intervention that the petitioners "have total control over the board of directors of BCBSLA and, by that control, have unfettered control of BCBSLA . . ." Please do not simply rely upon or restate the allegations of your petition for intervention.
5. Please identify by name and describe with specificity the substance and scope of information about which you expect each person identified in your Witness List to testify.
6. Please identify and describe:
 - a. your relationship to Stop the Sale, Inc. and to the website www.stopthesaleofblue.com, including in your response how the site is funded, how each item or weblink information posted thereon was or has been obtained;

and the identity of all other persons involved in the content and/or creation of the website;

- b. all shareholders, officers and directors, and interest-holders of Stop the Sale, Inc.
- 7. Please identify any third party (individual or corporate) with whom you communicate, consult with, or report to regarding this matter, including but not limited to your Petition for Intervention.
- 8. Please identify the funding source for your Petition for Intervention and all activities related thereto.
- 9. For the entire period of time that you have been a member of BCBSLA, identify every matter in which you cast a vote, describing the nature of the matter voted upon, the date of the vote, and how you voted.

REQUESTS FOR PRODUCTION OF DOCUMENTS

Please produce the following:

- 1. All exhibits, documents, communications, tangible things, or evidence that you may seek to introduce into evidence or use at the hearing of this matter.
- 2. All documents provided to or written communications with any experts or consultants retained by any party or that you have consulted in this matter.
- 3. The resume/curriculum vitae of any and all of your witnesses, whether designated as experts, that you may call at the hearing of this matter.
- 4. Any and all reports and/or opinions of any and all experts that you may present a hearing or trial in this matter.
- 5. All documents or communications referenced, mentioned, or relied upon by you in drafting the Petition for Intervention. To the extent responses are privileged, please provide a privilege log.
- 6. All documents or communications referenced, mentioned, or relied upon by you in answering any of the above interrogatories. To the extent responsive documents are privileged, please provide a privilege log.
- 7. All documents or communications between or among you and any and all other Intervenors in this matter. To the extent responsive documents are privileged, please provide a privilege log.
- 8. All communications between you and any witness on your witness list. To the extent responsive documents are privileged, please provide a privilege log.

9. All communications between you and any third party regarding BCBSLA's Plan of Reorganization and/or your Petition for Intervention.

McGLINCHEY STAFFORD, PLLC

/s/ Rodolfo J. Aguilar, Jr.

Rodolfo J. Aguilar, Jr. (Bar Roll No. 1192)

Ronnie L. Johnson (Bar Roll No. 20238)

Juston M. O'Brien (Bar Roll No. 26447)

Brad M. Barback (Bar Roll No. 35642)

Zelma Murray Frederick (Bar Roll No. 31459)

301 Main Street, 14th Floor

Baton Rouge, LA 70801

Telephone: (225) 382-9000

Facsimile: (225) 343-3076

rudyaquilar@mcglinchey.com

rjohnson@mcglinchey.com

jobrien@mcglinchey.com

bbarback@mcglinchey.com

zfrederick@mcglinchey.com

CERTIFICATE OF SERVICE

I CERTIFY that a copy of the foregoing pleading was served by e-mail to all parties.

Baton Rouge, Louisiana, this the 24th day of January, 2024.

/s/ Rodolfo J. Aguilar, Jr.

Rodolfo J. Aguilar, Jr.