

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**

OBJECTION TO WITNESS LIST
FILED BY JOHN S. BRADFORD

NOW COMES Louisiana Health Service & Indemnity Company D/B/A Blue Cross and Blue Shield of Louisiana (“BCBSLA”), who respectfully files this Objection to the Witness List filed by John S. Bradford (“Bradford”) on January 22, 2024, as amended on January 23, 2024 (“Witness List”).

BCBSLA requests that Your Honor strike Bradford’s Witness List in whole, or, alternatively, strike Bryan Camerlinck and Jerome Greig from the Bradford’s Witness List for the following reasons:

First, Bradford has not yet been given intervenor status. Bradford filed a petition for intervention on January 16, 2024. BCBSLA filed an objection to Bradford’s intervention. The hearing officer has not yet ruled on Bradford’s intervention, and BCBSLA maintains its objection to Bradford’s intervention. To the extent the hearing officer denies Bradford’s intervention, this objection becomes moot.

Additionally, Rule 1, § 1115(B) provides that a petition for intervention must contain “a statement as to the nature and quantity of evidence petitioner will present if such petition is granted.” Bradford’s petition for intervention provides no such statement and identifies no

evidence he intends to offer. Bradford's Witness List reflects an intention to call two BCBSLA representatives as witnesses, Mr. Camerlink, Executive Vice President and COO, and Mr. Greig, Chair of the Board of Directors.¹ BCBSLA has not identified Mr. Camerlink or Mr. Greig as witnesses. BCBSLA will be calling three BCBSLA representatives as witnesses, Dr. I Steven Udyarhelyi, President and CEO, Darrel Langlois, Senior Vice President and Chief Strategy and Business Development Officer, and Tim Barfield from the Board of Directors. All relevant information concerning the BCBSLA Plan of Reorganization can be provided by these BCBSLA witnesses. Mr. Camerlink and Mr. Greig will have no materially relevant information to add to the inquiry, and Bradford has provided no basis for calling them or any additional BCBSLA representatives to testify at the hearing. The calling of additional BCBSLA representatives serves no purpose but to unnecessarily enlarge the proceedings and offer duplicative testimony.

Under Rule 1, the hearing officer has great discretion regarding the introduction of evidence and the manner in which the public hearing proceeds. Rule 1, § 1123 specifically authorizes the hearing officer to limit the number of witnesses. The public hearing in this matter is currently scheduled for two days, and must provide time for BCBSLA and the Commissioner to put on their respective evidence, as well as public comment. Neither time nor justice allows for Bradford to call additional BCBSLA representatives as witnesses at the public hearing.

For the above stated reasons, BCBSLA respectfully requests that Your Honor strike Bradford's Witness List in whole, or, alternatively, strike Bryan Camerlinck and Jerome Greig from the Bradford's Witness List.

¹ Bradford's Witness List also identifies Randall Stevenson, with Hause Actuarial Solutions, as a witness. The Commissioner's witness list already identifies as a witness "A representative or representatives of Hause Actuarial Solutions, Inc."

Respectfully submitted this 25th day of January, 2024.

McGLINCHEY STAFFORD, PLLC

/s/ Brad M. Barback

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 25th day of January, 2024, a copy of the above and foregoing has been sent via electronic mail to the following:

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