

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

AMENDED PREHEARING MEMORANDUM OF THE COMMISSIONER OF INSURANCE FOR THE STATE OF LOUISIANA CONCERNING WITNESSES

Louisiana Commissioner of Insurance Tim Temple (the “Commissioner”) files this amended memorandum concerning witnesses in accordance with the Order of the Hearing Officer dated January 26, 2024.

WITNESSES TO BE CALLED ON DIRECT EXAMINATION

A. **Brief summary if the testimony of the Commissioner’s witnesses and relevance and scope of the testimony**

- A representative of Rector & Associates, Inc. will testify regarding all matters referred to in the “Report to the Louisiana Department of Insurance regarding Louisiana Health Service & Indemnity Company (D/B/A/ Blue Cross Blue Shield of Louisiana dated August 14, 2023” and any opinions or conclusions that can be drawn therefrom. Further, the representative may also testify regarding any (i) comments or suggestions to for changes to proposed Plan of Reorganization, (ii) opinions regarding the expert reports or testimony submitted by the expert for any other party, (iii) opinions regarding the testimony of any lay witnesses, and (iv) any other matters relevant to the any

issue presented in the hearing. All such matters are relevant to and within the scope of issues presented by the Plan of Reorganization

- A representative of Hause Actuarial Solutions, Inc. will testify regarding all matters referred to in the “Actuarial Review of Proposed Sponsored Demutualization of Blue Cross/Blue Shield of Louisiana dated August 15, 2023” and any opinions or conclusions that can be drawn therefrom. Further, the representative may also testify regarding any (i) comments or suggestions to for changes to proposed Plan of Reorganization, (ii) opinions regarding the expert reports or testimony submitted by the expert for any other party, (iii) opinions regarding the testimony of any lay witnesses, and (iv) any other matters relevant to the any issue presented in the hearing. All such matters are relevant to and within the scope of issues presented by the Plan of Reorganization

B. Anticipated amount of time needed for the testimony of the Commissioner’s witnesses

- The Commissioner estimates that the direct testimony of each of the above witnesses will be approximately 30 – 45 minutes.

WITNESSES TO BE CALLED ON CROSS EXAMINATION

The Commissioner may call any of the witnesses listed as cross-examination witnesses on his Final Witness list for any matters relevant to and within the scope of issues presented by the Plan of Reorganization and by the direct testimony of such witnesses.

The Commissioner assures the Hearing Officer that the purpose of the hearing and any testimony will not be used to unnecessarily extend or prolong the hearing.

Respectfully submitted,

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ATTORNEYS FOR TIM TEMPLE
COMMISSIONER OF INSURANCE FOR THE
STATE OF LOUISIANA, and
THE LOUISIANA DEPARTMENT OF
INSURANCE

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing has this date been served on all counsel of record in the proceeding by electronic mail on January 30, 2024.

/s/ David S. Rubin
David S. Rubin