

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**

**ELEVANCE HEALTH, INC. AND ATH HOLDING COMPANY, LLC
OBJECTION TO INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS OF JOHN S. BRADFORD**

Elevance Health, Inc. (“Elevance”), and ATH Holding Company, LLC (“ATH”), object to the interrogatories and requests for production of documents propounded by John S. Bradford, in proper person, on January 29, 2024, as follows:

The Scheduling Order for Proposed Plan of Reorganization states:

IT IS HEREBY ORDERED that: . . .

(e) All written discovery is to be propounded **no later than January 24, 2024**, at 4:30 p.m. Central Standard Time. All parties shall be limited to ten interrogatories and ten requests for production of documents, inclusive of subparts. Responses to all written discovery shall be due no later than February 2, 2024, at 4:30 pm. Central Standard Time.

(Emphasis added.)

Mr. Bradford’s written discovery requests to Elevance for the Plan of Reorganization were issued January 29, 2024, five (5) days after the January 24 deadline set forth in the Scheduling Order. As a result, Elevance and ATH object *in toto* to the written discovery propounded by John S. Bradford.

Respectfully provided this 2nd day of February, 2024.

/s/ Andrew R. Lee

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Certificate of Service

I hereby certify that a copy of the above and foregoing has been sent via electronic mail
to the following:

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This the 2nd day of February 2024.

/s/ Andrew R. Lee