

**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. \_\_\_\_\_

**FINAL WITNESS LIST AND EXHIBIT LIST**  
**ON BEHALF OF INTERVENOR, HENRY W. KINNEY ET. AL.**

**NOW INTO THESE PROCEEDINGS**, comes in the above-referenced action, Henry W. Kinney, individually and as counsel for Kinney, Ellinghausen & DeShazo, Accounting Plus Solutions, L.L.C., Robert E. Birtel, Martha C. Foy, William T. Foy, Travis M. Foy, David Giles, Teresa Giles, Riley Hagan, III, Glenn Young, and Judith Young (hereafter, collectively referred to as “Intervenors”), who respectfully submits the following **Witness List and Exhibit List** in connection with the upcoming Public Hearings scheduled on February 14, 2024 and February 15, 2024, as set forth in the Commissioner’s Scheduling Order:

**WITNESSES**

1. Tim Barfield, member of the Board of Directors for Blue Cross and Blue Shield of Louisiana.
2. Dr. Steven Udvarhelyi, President and CEO of Blue Cross and Blue Shield of Louisiana.
3. Jason Guilbeau, Vice President and Chief Technology Officer at Blue Cross and Blue Shield of Louisiana
4. A representative or representatives of the Louisiana Hospital Association.
5. A representative or representatives of the Louisiana Medical Society.

6. A representative or representatives of the Louisiana Attorney General's office.
7. A representative or representatives of Elevance Health, Inc.
8. Any other witness listed by any other party or any intervenor.
9. Any witness identified during the course of discovery.
10. Any witness needed for impeachment or rebuttal evidence.
11. Any witness needed for the introduction of any exhibit.
12. Any witness needed to authenticate any document.
13. Any witness listed by the Louisiana Department of Insurance.

Intervenors reserves the right to supplement and/or amend this list if required by additional information obtained.

### **EXHIBITS**

1. February 8, 2024, edition of Healthcare Journal of Baton Rouge.
2. Hause Actuarial Solutions: Actuarial Review of Proposed Sponsored Demutualization of Blue Cross/Blue Shield of Louisiana dated August 15, 2023.
3. Rector & Associates, Inc.: Report to the Louisiana Department of Insurance regarding Louisiana Health Service & Indemnity dated August 14, 2023.
4. Articles of Incorporation and corporate documents of The Accelerate Louisiana Initiative, Inc.
5. Complaint involving *Unites States of America v. Anthem*, 20 Civ. 2593, Southern District of New York.
6. Violation Tracker list of penalties involving Elevance Health, Inc. and related entities.
7. Violation Tracker Current Parent Company Summary.

8. Senate Committee on Health and Welfare and Senate Committee on Insurance Oversight report on the Proposed Acquisition of Blue Cross and Blue Shield of Louisiana dated February 8, 2024.
9. Deposition Testimony of Steven Udvarhelyi and Tim Barfield dated February 7, 2024
10. Louisiana State Medical Society Open Letter dated January 30, 2024.
11. Louisiana Hospital Association Letter dated February 8, 2024.
12. Letter from Dr. John Fleming, Treasurer of Louisiana, dated February 8, 2024.
13. Daily News LHA February 7, 2024.
14. Any exhibit listed by the Louisiana Department of Insurance.

Intervenors reserves the right to supplement and/or amend this list if required by additional information obtained.

**RESPECTFULLY SUBMITTED:**

**KINNEY, ELLINGHAUSEN & DESHAZO**



**HENRY W. KINNEY (#7410)**  
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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on this 9<sup>th</sup> day of February 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:**



**HENRY W. KINNEY (#7410)**

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