

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

**FINAL WITNESS AND EXHIBIT LISTS OF THE COMMISSIONER OF INSURANCE
FOR THE STATE OF LOUISIANA**

Louisiana Commissioner of Insurance Tim Temple (the “Commissioner”) and the Louisiana Department of Insurance (“LDI”) file this final witness list and exhibit list for the hearing to consider the Plan of Reorganization Regarding the Conversion from a Mutual Insurance Company to a Stock Insurance Company filed by Louisiana Health Service & Indemnity Company d/b/a Blue Cross and Blue Shield of Louisiana (“BCBSLA”).

WITNESSES

WITNESSES ON DIRECT EXAMINATION

1. A representative or representatives of Rector & Associates, Inc.
 - a. Direct testimony estimated – 30 minutes
2. A representative or representatives of Hause Actuarial Solutions, Inc.
 - a. Direct testimony estimated – 45 minutes
3. Any witness needed for impeachment or rebuttal evidence
4. Any witness needed to identify, authenticate, or necessary for the introduction of an exhibit

WITNESSES ON CROSS EXAMINATION

1. One or more representatives or representatives of BCBSLA.
2. One or more representatives or representatives of Elevance Health, Inc. and/or ATH Holding Company, LLC
3. A representative or representatives of Chaffe & Associates
4. A representative or representatives of Deloitte Consulting LLP

5. A representative or representatives of Cain Brothers
6. Any witness listed or called by any party, intervenor, or other person
7. Any person allowed to introduce evidence
8. Any witness identified during the course of discovery
9. Any person whose deposition was taken by any party or intervenor

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

EXHIBITS

1. Any documents (in any format, including electronic data) submitted to the Louisiana Department of Insurance by Louisiana Health Service & Indemnity Company (D/B/A Blue Cross and Blue Shield of Louisiana) (“BCBSLA”), Elevance Health Inc., or ATH Holding Company, LLC in connection with the (a) Plan or Reorganization Regarding the Conversion from a Mutual Insurance Company to a Stock Insurance Company and (b) proposed acquisition of BCBSLA, unless the Hearing Officer determines that such document may not be used as evidence because the document is subject to an evidentiary privilege, is subject to non-disclosure under the Louisiana Public Records law, or contains confidential personal information
2. All documents and data posted on the LDI website (including all public comments) regarding this matter
3. Notice of Public Hearing posted on LDI website
4. Affidavit of Publication for Notice of Public Hearing – The Advocate (Baton Rouge)
5. Affidavit of Publication for Notice of Public Hearing – The Advocate (New Orleans)
6. Affidavit of Publication for Notice of Public Hearing – American Press (Lake Charles)
7. Rector & Associates, Inc. Report to the Louisiana Department of Insurance Regarding Louisiana Health Service & Indemnity Company (D/B/A Blue Cross and Blue Shield of Louisiana) dated August 14, 2023
8. CV/resume’ of Neil K. Rector
9. CV/resume’ of Sarah Wilson Schroeder
10. Hause Actuarial Solutions, Inc. Actuarial Report of Proposed Sponsored Demutualization of Blue Cross/Blue Shield of Louisiana dated August 15, 2023
11. CV/resume’ of Randall Stevenson

12. Memorandum from McGlinchey Stafford PLLC to Korey Harvey dated July 27, 2022
13. Letter from Korey Harvey to Chaffe and Associates dated August 24, 2022
14. Letter from Korey Harvey to Chaffe and Associates dated September 30, 2022
15. Letter from Chaffe and Associates to Board of Directors of Louisiana Health Service & Indemnity Company dated January 12, 2023
16. Letter from Chaffe and Associates to Board of Directors of Louisiana Health Service & Indemnity Company dated September 12, 2023
17. CV/resume' of witness testifying on behalf of Chaffe and Associates
18. Letter from Deloitte Consulting LLP to Board of Directors of Louisiana Health Service & Indemnity Company dated January 12, 2023
19. CV/resume' of witness testifying on behalf Deloitte Consulting LLP
20. Letter (with attached slide deck) from Cain Brothers to Board of Directors of Louisiana Health Service & Indemnity Company dated December 23, 2022
21. CV/resume' of witness testifying on behalf Cain Brothers
22. Letters from Mr. Ronnie Johnson to Rector and Associates, Inc. dated:
 - a. July 7, 2023
 - b. July 17, 2023
 - c. August 2, 2023
 - d. August 7, 2023
 - e. August 13, 2023
 - f. January 15, 2024
 - g. January 22, 2024
 - h. January 23, 2024
23. BCBS Update March 2004 – Conversion and Preservation of Charitable Assets of Blue Cross and Blue Shield Plans: How States Have Protected or Failed to Protect the Public Interest
24. American Academy of Actuaries Practice Note: Distribution of Policyholder Equity in a Demutualization
25. Actuarial Standards Board Standard of Practice 37 – Allocation of Policyholder Consideration in Mutual Life Insurance Company Demutualizations – updated May 1, 2011

26. Actuarial Standards Board Standard of Practice 17 – Expert Testimony by Actuaries – March 2002
27. Actuarial Standards Board Standard of Practice 19 – Appraisals of Casualty, Health, and Life Insurance Businesses – May 1, 2011
28. Documents regarding fines, penalties etc. ordered or assessed against by Elevance Health Inc. or any of its affiliates or controlled entities and any litigation involving the same
29. Articles and ByLaws of BCBSLA
30. Accelerate of Louisiana Initiative, Inc. Certificate of Incorporation dated December 2, 2022 – Delaware
31. Accelerate of Louisiana Initiative, Inc. Delaware Certificate – conversion to La. Corp. – dated November 30, 2023
32. Accelerate of Louisiana Initiative, Inc. – Change to La. – dated November 30, 2023
33. Accelerate of Louisiana Initiative, Inc. – Amended Bylaws dated November 21, 2023
34. Complaint – United States of America vs. Anthem, Inc., 20 Civ. 2593, USDC SDNY
35. Internal Revenue Code 833 and 501(c)(4)
36. Violation Tracker Company Summary
37. Senate Committee on Health and Welfare and Senate Committee on Insurance Oversight Report on the Proposed Acquisition of BCBSLA
38. Any document listed by any party or intervenor on an exhibit list
39. Any document introduced by any party or intervenor on any exhibit list in this matter
40. Any public document (printed or electronic) relevant to this matter of which judicial notice may be taken, including the laws, statutes, and regulations of Louisiana or any other state
41. Documents and records in any form (including electronic data) regarding the solicitation and voting process implemented by BCBSLA, including but not limited to:
 - a. Call scripts
 - b. “FAQ’s”
 - c. Contracts with balloting/solicitation companies and consultants
 - d. Recordings
 - e. Ballot verification data

42. Any documents and data that the Commissioner could not reasonably have anticipated as of the time of the filing of this list and any documents and data that have been requested by LDI from BCBSLA, Elevance Health, Inc. and/or ATH Holding Company, LLC but not yet received

THE COMMISSIONER RESERVES THE RIGHT TO SUPPLEMENT AND AMEND THIS LIST

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Respectfully submitted,

BY: J. DAVID CALDWELL, JR. (#26832)
Executive Counsel
CLAIRE LEMOINE (#20497)
Louisiana Department of Insurance
Division of Legal Services
1702 North Third Street
Baton Rouge, Louisiana 70802
Phone: (225) 342-5272
Emails: david.caldwell@ldi.la.gov
claire.lemoine@ldi.la.gov

- and -

BUTLER SNOW, LLP

BY: /s/ David S. Rubin
DAVID S. RUBIN (#11525)
JOSHUA G. MCDIARMID (#35238)
ANGELLE E. CROCHET (#40323)
445 North Boulevard, Suite 300
Baton Rouge, Louisiana 70802
Phone: (225) 325-8700
Facsimile: (225) 325-8800
Emails: david.rubin@butlersnow.com
josh.mcdiarmid@butlersnow.com
angelle.crochet@butlersnow.com

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 February 9, 2024.

/s/ David S. Rubin
David S. Rubin

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