

**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**

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

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

**INTERROGATORY NO. 1:**

Is Elevance Health being sued by the Department of Justice for fraud?

**ANSWER TO INTERROGATORY NO. 1:**

See *U.S. v. Anthem Inc.*, 1:20-cv-02593-ALC, S.D.N.Y.

**REQUEST FOR PRODUCTION NO. 1:**

If the answer is yes, then produce the Petition of the United States Department of Justice and the answer by Elevance Health.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 1:**

See response to Interrogatory no. 1. Further answering, the pleadings are publicly available and included in exhibits submitted by co-Intervenor Henry Kinney.

**INTERROGATORY NO. 2:**

Did Elevance Health provide any documents to Blue Cross Blue Shield of Louisiana concerning claims against them or Anthem Inc., AIM Health or any subsidiary they own or

operate?

**ANSWER TO INTERROGATORY NO. 2:**

Elevance Health objects to the request as improper and seeking information that is irrelevant to the resolution of the pending matter. The request is also objectionable as it is vague and ambiguous to the extent it seeks documents regarding “claims” which is not a defined term.

**INTERROGATORY NO. 3:**

Since 2000, has Elevance Health or any of their subsidiaries paid any penalties or settlement of the above claims.

**ANSWER TO INTERROGATORY NO. 3:**

Elevance Health objects to the request as improper and seeking information that is irrelevant to the resolution of the pending matter. The request is also objectionable as it is vague and ambiguous to the extent it seeks information regarding “claims” which is not a defined term.

**INTERROGATORY NO. 4:**

Does Elevance Health, AIM Health or any other subsidiaries provide any services to Blue Cross Blue Shield of Louisiana?

**ANSWER TO INTERROGATORY NO. 4:**

Elevance Health objects to the request as improper and seeking information that is irrelevant to the resolution of the pending matter.

**REQUEST FOR PRODUCTION NO. 2:**

If the answer is yes, please provide any contract Elevance Health as its subsidiaries has with Blue Cross Blue Shield of Louisiana for the above services.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 2:**

See response to Interrogatory no. 4.

**REQUEST FOR PRODUCTION NO. 3:**

Please give the name and address of the person or persons in charge of the services being provided by Elevance or its subsidiaries.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 3:**

Elevance Health objects to the request as improper and seeking information that is irrelevant to the resolution of the pending matter. The request is also objectionable as it is vague and ambiguous to the extent it seeks information regarding “person or persons in charge of the services” which is not defined and subject to multiple possible meanings.

Respectfully provided this 12th 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  
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This the 12th day of February 2024.

/s/ Andrew R. Lee