

19TH JUDICIAL DISTRICT COURT FOR THE PARISH OF EAST BATON ROUGE

STATE OF LOUISIANA

NUMBER: 641 928

SECTION: 26

JAMES J. DONELON
COMMISSIONER OF INSURANCE FOR THE STATE OF LOUISIANA

VERSUS
LOUISIANA HEALTH COOPERATIVE, INC.

FILED: _____

MAR 31 2017

BY _____
DEPUTY CLERK OF COURT

DEPUTY CLERK

**MOTION TO APPROVE ADDENDUM TO THE CONTRACT FOR
PROFESSIONAL SERVICES OF WALTERS, PAPIILLION, THOMAS, CULLENS, LLC.**

NOW INTO COURT, through undersigned counsel, comes James Donelon, Commissioner of Insurance for the State of Louisiana, in his capacity as Rehabilitator, (hereinafter referred to as "the Commissioner"), and Billy Bostick, Court appointed Receiver, of Louisiana Health Cooperative, Inc. in Rehabilitation ("LAHC"), who hereby moves this Honorable Court for an Order approving an addendum to the Contract For Professional Services with Walters, Papillion, Thomas Cullens, LLC ("WPTC"), to expand the scope of services to be performed for the following reasons:

1.

On or about January 8, 2016, this Court approved a contract for WPTC to represent LAHC in connection with LAHC's claims against former LAHC directors and officers, accountants, in-house attorneys, actuaries, outside counsel, third party vendors and other potential claims against other identified persons or entities whose tortious conduct allegedly contributed to the failure of LAHC (the "Recovery Litigation"). A copy of the Motion and Order and the approved WPTC contract is attached hereto and incorporated herein as Exhibit A.

2.

The approved WPTC contract provided that WPTC agreed to advance all Litigation Expenses for the Recovery Litigation, which expenses are to be repaid by LAHC to WPTC only in the event of LAHC's recovery in the Recovery Litigation.

3.

The Receiver desires and is entitled to amend the WPTC contract to provide for payment by LAHC of certain of the Litigation Expenses and for pursuit of Risk Corridor recovery. A copy of the proposed addendum to the WPTC contract is attached hereto as Exhibit B.

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REC'D C.P.
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WHEREFORE, James Donelon, Commissioner of Insurance for the State of Louisiana, in his capacity as Rehabilitator and Billy Bostick, in his capacity as Court appointed Receiver, of Louisiana Health Cooperative, Inc. in Rehabilitation, request an order of this Court approving the addendum to the contract of Walters, Papillion, Thomas, Cullens, LLC and ordering that all payments required by Louisiana Health Cooperative, Inc. in Rehabilitation under the contract as amended to be made by Louisiana Health Cooperative, Inc. in Rehabilitation directly to Walter, Papillion, Thomas, Cullens, and for all other appropriate relief.

Respectfully Submitted,

**JEFF LANDRY
ATTORNEY GENERAL**

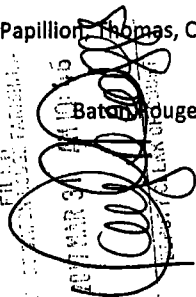
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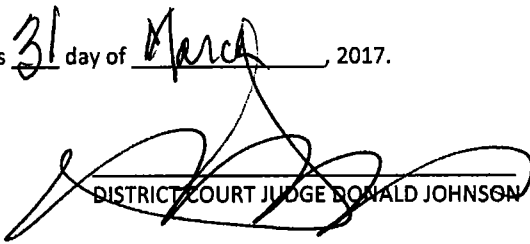
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Attorneys for **JAMES J. DONELON, Commissioner of Insurance for the State of Louisiana as Rehabilitator of Louisiana Health Cooperative, Inc. in Rehabilitation**

ORDER

IT IS HEREBY ORDERED that the addendum to the contract between Walters, Papillion, Thomas, Cullens and James J. Donelon, Commissioner of Insurance for the State of Louisiana in his capacity as Rehabilitator of Louisiana Health Cooperative, Inc. in Receivership, attached hereto and marked Exhibit "B," be and same hereby is approved upon the terms and conditions set forth therein and in the original contract approved by this Court on January 8, 2016, with all payments required by Louisiana Health Cooperative, Inc. in Rehabilitation under the contract as amended to be made by Louisiana Health Cooperative, Inc. in Rehabilitation directly to Walter, Papillion, Thomas, Cullens.


FILED
CLERK OF COURT
EAST BATON ROUGE PARISH, LOUISIANA

Baton Rouge, Louisiana, this 31 day of March, 2017.



DISTRICT COURT JUDGE DONALD JOHNSON