

19<sup>th</sup> JUDICIAL DISTRICT COURT FOR THE PARISH OF EAST BATON ROUGE

## STATE OF LOUISIANA

NO. 651,069

SECTION 22

JAMES J. DONELON, COMMISSIONER OF INSURANCE  
FOR THE STATE OF LOUISIANA, IN HIS CAPACITY AS  
REHABILITATOR OF LOUISIANA HEALTH COOPERATIVE, INC.

VERSUS

TERRY S. SHILLING, GEORGE G. CROMER, WARNER L. THOMAS, IV,  
WILLIAM A. OLIVER, CHARLES D. CALVI, PATRICK C. POWERS,  
CGI TECHNOLOGIES AND SOLUTIONS, INC.,  
GROUP RESOURCES INCORPORATED, BEAM PARTNERS, LLC,  
AND TRAVELERS CASUALTY AND SURETY COMPANY OF AMERICA

FILED: \_\_\_\_\_  
DEPUTY CLERK

**EX PARTE MOTION FOR EXTENSION OF TIME  
TO FILE RESPONSIVE PLEADINGS**

NOW INTO COURT, through undersigned counsel, comes defendant, Zurich American Insurance Company, and upon suggesting to the Court that it was served through the Louisiana Secretary of State with a copy of the Citation for the Original and Supplemental and Amending Petition of plaintiff, James J. Donelon, Commissioner of Insurance for the State of Louisiana, in his capacity as Rehabilitator of Louisiana Health Cooperative, Inc., and without waiver of any defenses and reserving all rights, further suggests that it requires additional time to review this matter and prepare responsive pleadings and defenses thereto, hereby moves this Honorable Court to grant Zurich American Insurance Company an additional thirty (30) days or until December 20, 2017, within which to file responsive pleadings to plaintiff's Second Supplemental and Amended Restated Petition for Damages.

Zurich American Insurance Company certifies that it has not previously received any extensions of time to plead and that it is unaware of any objection to this extension of time being requested or filed into the record.

Respectfully submitted,

**CERTIFICATE OF SERVICE**

13 I do hereby certify that I have on this  
day of Nov, 2017,  
served a copy of the foregoing pleading on counsel for  
all parties to this proceeding, by depositing it in the  
United States mail, properly addressed, and first class  
postage prepaid, by hand delivery or by facsimile.

Salley, Hite, Rivera & Mercer, LLC  
**JOHN W. HITE III (T.A. 17611)**  
**JAMES G. ALBERTINE, JR. (35023)**  
One Canal Place  
365 Canal Street, Suite 1710  
New Orleans, LA 70130  
Telephone: 504/566-8800  
Facsimile: 504/566-8828

BY: \_\_\_\_\_  
**JOHN W. HITE III**  
**ATTORNEYS FOR DEFENDANT,**  
**ZURICH AMERICAN INSURANCE**  
**COMPANY**

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FILED: \_\_\_\_\_  
DEPUTY CLERK

**ORDER**

Considering the Ex Parte Motion for Extension of Time to File Responsive Pleadings on behalf of Zurich American Insurance Company;

IT IS ORDERED that the motion is **GRANTED** and that defendant, Zurich American Insurance Company be granted an additional thirty (30) days or through December 20, 2017, to file responsive pleadings to plaintiff's Second Supplemental Amending and Restated Petition for Damages.

Baton Rouge, Louisiana, this \_\_\_\_ day of \_\_\_\_\_, 2017

\_\_\_\_\_  
JUDGE