

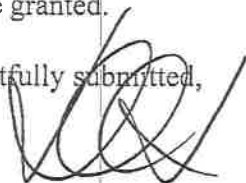
JAMES J. DONELON, COMMISSIONER OF INSURANCE FOR THE STATE OF LOUISIANA, IN HIS CAPACITY AS REHABILITATOR OF LOUISIANA HEALTH COOPERATIVE, INC.	:	SUIT NO.: 651,069 SECTION: 22
versus	:	19TH JUDICIAL DISTRICT COURT
TERRY S. SHILLING, GEORGE G. CROMER, WARNER L. THOMAS, IV, WILLIAM A. OLIVER, CHARLES D. CALVI, PATRICK C. POWERS, CGI TECHNOLOGIES AND SOLUTIONS, INC., GROUP RESOURCES INCORPORATED, BEAM PARTNERS, LLC, MILLIMAN, INC., BUCK CONSULTANTS, LLC. AND TRAVELERS CASUALTY AND SURETY COMPANY OF AMERICA	:	PARISH OF EAST BATON ROUGE STATE OF LOUISIANA

MOTION TO COMPEL

NOW INTO COURT, through undersigned counsel, comes James J. Donelon, Commissioner of Insurance for the State of Louisiana, in his capacity as Rehabilitator of Louisiana Health Cooperative, Inc. (“LAHC”), through his duly appointed Receiver, Billy Bostick (“Plaintiff” or the “Receiver”) who respectfully moves this Honorable Court to order defendant, Group Resources, Inc. (“GRI”), to respond appropriately and fully to the Receiver’s written discovery as specified in the attached Memorandum in Support. The Receiver also respectfully requests that his MOTION TO COMPEL be set for Zoom hearing on June 29, 2020, at 1:30 p.m., the date and time of the previously scheduled Zoom hearing regarding GRI’s Motion to Compel filed against the Receiver.

WHEREAS, given that some of the specified responses of GRI to the Receiver’s written discovery requests are inadequate and/or incomplete, the Receiver respectfully prays that counsel for GRI be ordered to appear at a contradictory Zoom hearing on June 29, 2020, and show cause why the Receiver’s Motion to Compel should not be granted.

Respectfully submitted,



J. E. Cullens, Jr., T.A., La. Bar #23011
Edward J. Walters, Jr., La. Bar #13214
Darrel J. Papillion, La. Bar #23243
Andrée M. Cullens, La. Bar #23212
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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing has been furnished via e-mail to all counsel of record as follows, this 10th day of June, 2020, in Baton Rouge, Louisiana.

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J. E. Cullens, Jr.

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

SUIT NO.: 651,069 SECTION: 22

versus :

19TH JUDICIAL DISTRICT COURT

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, MILLIMAN, INC., BUCK :
CONSULTANTS, LLC. AND :
TRAVELERS CASUALTY AND :
SURETY COMPANY OF AMERICA :

PARISH OF EAST BATON ROUGE

STATE OF LOUISIANA

RULE 10.1 CERTIFICATE OF CONFERENCE

I, the undersigned attorney, certify to the court as follows:

Undersigned counsel and counsel for GRI personally conducted a telephone conference on Friday, June 5, 2020. At this conference, there was a substantive discussion of every item presented to the court in this motion and, despite their best efforts, counsel were unable to resolve the matters presented.

Certified this 10th day of June, 2020.

Respectfully submitted,



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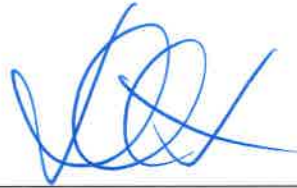
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J. E. Cullens, Jr.

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

SUIT NO.: 651,069 SECTION: 22

versus

19TH JUDICIAL DISTRICT COURT

TERRY S. SHILLING, GEORGE G.
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WILLIAM A. OLIVER, CHARLES D.
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TECHNOLOGIES AND SOLUTIONS,
INC., GROUP RESOURCES
INCORPORATED, BEAM PARTNERS,
LLC, MILLIMAN, INC., BUCK
CONSULTANTS, LLC. AND
TRAVELERS CASUALTY AND
SURETY COMPANY OF AMERICA

PARISH OF EAST BATON ROUGE

STATE OF LOUISIANA

ORDER

Considering the forgoing MOTION TO COMPEL filed herein by plaintiff:

IT IS HEREBY ORDERED that counsel for defendant, GRI, appear and show cause at a contradictory hearing to be held via Zoom conference on Monday, June 29, 2020, at 1:30 p.m. (the same date and time of the previously scheduled Zoom hearing regarding GRI's Motion to Compel), why the Receiver's MOTION TO COMPEL should not be granted as prayed for.

SO ORDERED this _____ day of _____, 2020, at Baton Rouge, Louisiana.

HONORABLE JUDGE TIMOTHY KELLEY

Respectfully submitted,



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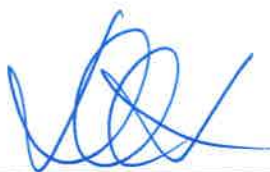
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J. E. Cullens, Jr.

JAMES J. DONELON, COMMISSIONER	:	SUIT NO.: 651,069 SECTION: 22
OF INSURANCE FOR THE STATE OF	:	
LOUISIANA, IN HIS CAPACITY AS	:	
REHABILITATOR OF LOUISIANA	:	
HEALTH COOPERATIVE, INC.	:	
	:	
versus	:	19TH JUDICIAL DISTRICT COURT
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TERRY S. SHILLING, GEORGE G.	:	
CROMER, WARNER L. THOMAS, IV,	:	
WILLIAM A. OLIVER, CHARLES D.	:	
CALVI, PATRICK C. POWERS, CGI	:	
TECHNOLOGIES AND SOLUTIONS,	:	PARISH OF EAST BATON ROUGE
INC., GROUP RESOURCES	:	
INCORPORATED, BEAM PARTNERS,	:	
LLC, MILLIMAN, INC., BUCK	:	
CONSULTANTS, LLC. AND	:	
TRAVELERS CASUALTY AND	:	
SURETY COMPANY OF AMERICA	:	STATE OF LOUISIANA

MEMORANDUM IN SUPPORT OF MOTION TO COMPEL

MAY IT PLEASE THE COURT:

GRI has not responded fully or appropriately to the Receiver’s written discovery requests. Each of the specific deficiencies of GRI’s responses will be addressed briefly in turn.

A. THE RECEIVER’S WRITTEN DISCOVERY AND GRI’S RESPONSES

On October 13, 2017, the Receiver propounded Interrogatories and Requests for Production of Documents to GRI. On or about February 7, 2018, GRI responded to the Receiver’s written discovery; attached as EXHIBIT A is a copy of GRI’s original Answers to Plaintiff’s Interrogatories, etc.¹ In May 2018, this litigation was stayed in its entirety by the first circuit; on April 27, 2020, the Louisiana Supreme Court issued a ruling that effectively lifted this stay. On May 29, 2020, undersigned counsel scheduled a Rule 10.1 telephone conference with counsel for GRI to discuss GRI’s responses to the Receiver’s written discovery. On June 2, 2020, GRI delivered its First Supplemental and Amended Responses to Plaintiff’s Requests for Production of Documents, etc.; attached as EXHIBIT B is a copy of GRI’s supplemental and amended responses. Following the Rule 10.1 conference on June 5th, the following discovery disputes could not be amicably resolved and remain contested.

For the following reasons, the Receiver respectfully requests that his Motion to Compel be GRANTED as prayed for herein.

¹ Because GRI’s answers restate and incorporate the Receiver’s Interrogatories and Requests verbatim, the Receiver does not attach a copy of his original written discovery requests here.

B. SPECIFIC DISCOVERY DISPUTES

1. GRI HAS NEITHER PRODUCED NOR PROVIDED ACCESS TO AN EMAIL SERVER CONTAINING CRITICAL EMAILS THAT IT CONTROLS

GRI served as the third party administrator (“TPA”) of LAHC from approximately May 2014 to May 2016. As alleged by the Receiver, GRI’s gross negligence was a substantial cause of LAHC’s dramatic failure. For example, as a result of GRI’s gross negligence as TPA, when the Receiver took over operations of LAHC, the insurance company had a backlog of approximately 50,000 claims that GRI had not processed.

Occasionally when personnel would send GRI a “secure” email to LAHC, that email was transmitted through GRI’s email server / service called PGP (Pretty Good Privacy). These “secure” emails and the preceding full exchange plus attachments were encrypted and stored on GRI’s PGP email server.² The contents of the entire email exchange never reached LAHC’s email system. The recipient at LAHC of such “secure” emails would receive a message similar to the one recreated below:

You have received a PGP Universal Secured Message from:

Andy Willoughby <andy@groupresources.com>

To read this message securely, please click this link:

<https://keys.groupresources.com/b/b.e?r=Philip%40DTec.us&n=8%2Blab4XfBxZRc9SYG1gp7Q%3D%3D>

The recipient of such a “secure” email at LAHC would click on the URL link in the email, which would direct the recipient to the PGP website, where the recipient would be prompted to create a new email account, if they did not already have one. Once logged into PGP, the recipient would then be using GRI’s PGP email server—not LAHC’s email system.³ Therefore, all “secure” email exchanges initiated by GRI were stored within the PGP email sever and were never transmitted through Mimecast or Office 365 (the internal email system used by LAHC). In other words, GRI has possession, custody, or control over these “secure” emails regarding LAHC which are located on its PGP email server—not the Receiver.

² Whether described as an “email” or “messaging” system or server, these are Communications that LAHC does not have.

³ LAHC’s base email system consisted of Outlook / Office 365 and an email archiving / protection service called Mimecast. If LAHC wanted to send an email containing PHI or any other “secure” information, the LAHC user just needed to type the word “secure” in the subject line and the email would be sent encrypted and stored in the Mimecast system. The recipient of such a “secure” email from LAHC would receive a message with a link to pick up the email in Mimecast, not Office 365. Because all emails initiated by LAHC traveled through Mimecast (both secure and non-secure), the Receiver has access to and custody of all of these emails. The current problem is that only GRI has custody of the “secure” emails initiated by GRI that relate to LAHC.

Although the Receiver specifically requested that GRI produce all Communications⁴ between GRI and LAHC, which would clearly include these “secure” emails, to date, GRI has not produced or provided access to these critical emails.

REQUEST FOR PRODUCTION NO. 5:

Please produce all Communications by and between GRI and LAHC. This request includes Communications sent directly to or from GRI or on GRI’s behalf.

SUPPLEMENTAL RESPONSE TO REQUEST NO. 5:

GRI objects to Request No. 5 as being excessively vague, overly broad and unduly burdensome and to the extent it is not limited to a specific and discernable period of time. GRI further objects to this request to the extent that Plaintiff is in a superior position to obtain this information since it physically seized all of the records, servers, etc. regarding LAHC in the possession of GRI prior to filing the suit against GRI. GRI will produce any non-privileged, responsive documents in its possession, custody or control. See generally GRI00053411-00060141 and GRI00347636-00384684.

See Exhibit B, p. 3; Exhibit A, p. 10. GRI’s statement in its Response to Request No. 5, that the Receiver “physically seized all of the records, servers, etc. regarding LAHC in the possession of GRI” is incorrect. At no time has the Receiver taken possession of the PGP email server that remains within the control of GRI. Although the Receiver attempted to obtain a copy of this PGP email system before this suit was filed, GRI did not provide decrypt keys to the Receiver which would allow him to access these “secure” emails.

Although the Receiver knows that these “secure” emails exist and that GRI should still have control over them,⁵ GRI has not yet produced or provided access to all of them as requested by the Receiver. Needless to say, but these “secure” emails are probably some of the most important evidence in this case. Without these “secure” emails from GRI, we are missing critical conversations about what happened at LAHC during GRI’s tenure.

During the Rule 10.1 conference held on June 5th, counsel for GRI seemed unaware or unfamiliar with GRI’s “secure” PGP email system. Counsel for GRI agreed to look into this issue and report back accordingly. Of course, if GRI produces and/or provides access to all of these emails contained on the PGP email system in advance of the hearing regarding this motion to compel, the Receiver should be able to withdraw his motion.

If, however, GRI is unable or unwilling to produce and/or provide access to these emails, they should be ORDERED to do so without further delay.

⁴ The term “Communication” was defined in the Receiver’s written discovery requests to “include any transmittal or receipt of information” of any kind, including “electronic media (such as electronic mail and instant and text messages).”

⁵ The subdomain name “keys.groupresourcesinc.com/. . .” taken from a GRI “secure” email (see example of URL address above), points to IP Address 12.39.25.199. Internet-based IP address geolocation software indicates that this PGP server is still located in Duluth, Georgia, the location of GRI’s home office.

2. GRI HAS NOT STATED UNEQUIVOCALLY THAT ALL DOCUMENTS, DATA, AND MATERIALS WITHIN ITS CONTROL HAVE BEEN PRODUCED

With the exception of GRI's supplemental response to Request for Production No. 19 (see Exhibit B, p. 8), GRI qualifies all of its responses to the Receiver's requests for production by stating that "GRI will produce" responsive documents and, if any documents are produced, to "See generally [reference to Bates Nos.]." This is not an appropriate or acceptable response.

Either GRI has produced all responsive, non-privileged documents, or it has not. By responding that it "will" produce documents without stating definitively that it has (or has not) produced all such documents, the Receiver is left wondering whether and when all responsive documents may be produced.

During the Rule 10.1 conference, counsel for GRI indicated that he would consider amending these answers to state clearly whether ALL responsive, non-privileged documents have been produced. If GRI amends its responses to clarify the same prior to the hearing, the Receiver should be able to withdraw his motion. If GRI cannot or will not so amend its responses, it should be ORDERED to do so without further delay.

3. GRI'S ANSWER TO INTERROGATORY NO. 9 IS INCOMPLETE

The Receiver's Interrogatory No. 9 asked GRI to "identify all other health insurers, other than LAHC, for which [GRI] have performed TPA services." Exhibit A, p. 8. In response, GRI answered that "GRI did not provide third party administrative services to any other health insurers during the time when LAHC was GRI's client, and GRI does not currently provide third party administrative services to any health insurers." *Id.* Fair enough; however, GRI did not state whether, prior to being LAHC's TPA, GRI provided TPA services to any other health insurer. As this question and answer goes directly to the heart of GRI's experience and core competency as a TPA for health insurers like LAHC, the Receiver is entitled to know the answer to this question.

During the Rule 10.1 conference, counsel for GRI indicated that he would consider amending GRI's answer to Interrogatory No. 9 fully. If GRI amends its answer to clarify the same prior to the hearing, the Receiver should be able to withdraw his motion. If GRI cannot or will not answer Interrogatory No. 9 fully, it should be ORDERED to do so without further delay.

CONCLUSION & PRAYER FOR RELIEF

For all reasons indicated above, the Receiver respectfully requests his Motion to Compel be GRANTED and that GRI be ordered to respond appropriately and fully to the Receiver's written discovery as prayed for herein.

Respectfully submitted,



J. E. Cullens, Jr., T.A., La. Bar #23011
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CERTIFICATE OF SERVICE

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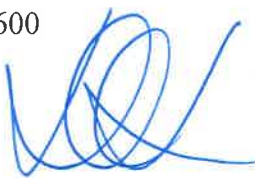
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J. E. Cullens, Jr.

19th JUDICIAL DISTRICT COURT
PARISH OF EAST BATON ROUGE
STATE OF LOUISIANA

NO. 651,069

SECTION 22

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

VERSUS

TERRY S. SHILLING, et al

**ANSWERS TO PLAINTIFF'S INTERROGATORIES
AND RESPONSE TO REQUEST FOR PRODUCTION OF DOCUMENTS
PROPOUNDED TO DEFENDANT, GROUP RESOURCES INCORPORATED**

NOW COMES Defendant, Group Resources, Inc. (hereinafter "GRI" and/or "Defendant"), through undersigned counsel, which responds to the Interrogatories and Request for Production of Documents (the "Discovery Requests") of Plaintiff, James J. Donelon, Commissioner of Insurance for the State of Louisiana, in his capacity as Rehabilitator of Louisiana Health Cooperative, Inc. ("LAHC" and/or "Plaintiff"), as follows:

GENERAL AND SPECIFIC OBJECTIONS

1. Defendant objects to the Discovery Requests to the extent that they seek information or documents which are subject to the attorney-client privilege, the work-product doctrine, or both, or any other applicable privilege, protection, exemption or immunity.

2. Defendant objects to any instructions and definitions preceding or incorporated into the Discovery Requests to the extent that they exceed or are inconsistent with, or purport to impose burdens or duties upon Defendant greater than, the Local Rules, the Louisiana Code of Civil Procedure and any applicable jurisprudence. Defendant shall respond to the Discovery Requests in accordance with the Local Rules, the Louisiana Code of Civil Procedure and applicable jurisprudence.

INTERROGATORIES

INTERROGATORY NO. 1:

Please identify and provide the full name, address, and telephone number of all persons providing the information used in answering these written discovery requests.



ANSWER TO INTERROGATORY NO. 1:

W. Andrew Willoughby
Senior Vice President, Chief Operating Officer
Group Resources
3080 Premiere Parkway
Suite 100
Duluth, GA 30097-4904
(678) 475-3606

Eric J. Nathan
Weener and Nathan, LLP
5887 Glenridge Dr., Ste. 275
Atlanta, GA 30328
(770) 392-9004

INTERROGATORY NO. 2:

Please identify by name, address, telephone number, and position all GRI personnel, employees, agents, or other representatives who performed administrative, management, or other services for LAHC (hereafter "TPA services"), and summarize each such person's services or involvement.

ANSWER TO INTERROGATORY NO. 2:

GRI objects to Interrogatory No. 2 as being excessively vague, overly broad and unduly burdensome and to the extent it is not limited to a specific and discernable period of time. Without waiver of the foregoing objections the following individuals are and/or were employed by GRI and provided work on GRI's behalf on the LAHC project.

W. Andrew Willoughby – Chief Operating Officer
Group Resources
3080 Premiere Parkway
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(678) 475-3606

Sheila Autry – Director of Claims
Group Resources
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Tom Byrd – President and Chief Executive Officer
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Aline Cook – Post claims process – auditing/voids/refunds
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Ryan Ryser – Check register production
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Becky Kirkland - Membership
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Debbie Bloodworth – Systems coordinator/supervisor of phone unit
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Mike Reed – Information Technology
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Octavia Young - Membership
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Tamara Johnson – Claims gateway (supervision of scanning and verification) - auditing
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Duluth, GA 30097-4904
(678) 475-3720

Donna Chambers – Claims scanning
Group Resources
3080 Premiere Parkway
Suite 100
Duluth, GA 30097-4904
(678) 475-3796

Melissa Williamson - Eligibility
Group Resources
3080 Premiere Parkway
Suite 100
Duluth, GA 30097-4904
(678) 475-3628

Ivonne DeJesus – Customer Service
Group Resources
3080 Premiere Parkway
Suite 100
Duluth, GA 30097-4904
(678) 475-3646

Dave Obermeyer - Controller
Group Resources
3080 Premiere Parkway
Suite 100
Duluth, GA 30097-4904
(678) 475-3621

Robby Kerr – no longer with GRI - Chief Marketing Officer
3583 Lily Magnolia Court
Buford, GA 30519

Tokoya Floyd – no longer with GRI –Claims verification
3113 Woodiron Dr.
Duluth, GA 30097

Gail McDougal – no longer with GRI – Customer Service
3527 Autumn Farm Terrace
Buford, GA 30519

Brooke Hardy – no longer with GRI – Eligibility
173 Settle St.
Winder, GA 30680

Valerie Kellar – no longer with GRI – Benefit Advisor/Claims Examiner
5019 Bathgate Ct.
Sugar Hill, GA 30518

Charlotte Mitchell – no longer with GRI – Customer Service
578 Briarhurst Ct.
Lawrenceville, GA 30046

Samantha Martin – no longer with GRI – Claims verification
363 Lokeys Ridge Rd.
Bethlehem, GA 30620

Latoya Hicks – no longer with GRI - Membership
405 Philip Blvd., Apt 112
Lawrenceville, GA 30046

Angie Hinson – no longer with GRI – Benefit Advisor/Claims Examiner
135 Hunters Run
Jefferson, GA 30549

Valerie Cox – no longer with GRI – Benefit Advisor/Claims Examiner
1869 Appaloosa Ln., Apt#1212
Buford, GA 30519

Wellington Olacio – no longer with GRI – Information Technology
3333 Spindletop Dr., NW
Kennesaw, GA 30144

Artia Gay – no longer with GRI - Membership
2740 Shady Hill Court
Snellville, GA 30039

Meri Ann Worley – no longer with GRI – Benefit Advisor/Claims Examiner
1168 S. Burgess Dr.
Baton Rouge, LA 70815

Donna Buncy – no longer with GRI – Claims verification
3528 Greggs Rd.
Gainesville, GA 30507

Sherry Lawson – no longer with GRI – Customer Service
1881 Roxey Lane
Winder, GA 30680

Jennifer George – no longer with GRI – Claims verification
231 Cottonpatch Rd.
Lawrenceville, GA 30046

INTERROGATORY NO. 3:

Please identify by name, address, telephone number, and position all persons involved in establishing or evaluating the training, licensure, and certification of GRI personnel, employees, agents, or other representatives who performed TPA services for LAHC, and describe the role of each person identified.

ANSWER TO INTERROGATORY NO. 3:

GRI objects to Interrogatory No. 3 as being excessively vague, overly broad, unduly burdensome and to the extent it is not limited to a specific and discernable period of time. Without waiver of the foregoing objections, there are no license or certificates required for GRI employees to perform TPA services. GRI evaluates the skills, talent and experience of new hires on a case-by-case basis. GRI's new hire training varies depending on each new hire's experience and the department within GRI in which that person is being hired to work. W. Andrew Willoughby,

Sheila Autry, Tom Bryd, Debbie Bloodworth, Tamera Johnson and Dave Obermeyer were responsible for hiring in their respective departments.

INTERROGATORY NO. 4:

Please identify the name, address, telephone number, position, and current employer of any individual who participated in creating any contract or other agreement between GRI and LAHC, including but not limited to any individual involved in determining fees and other contract terms.

ANSWER TO INTERROGATORY NO. 4:

GRI objects to Interrogatory No. 4 as being excessively vague, overly broad and unduly burdensome and to the extent it is not limited to a fixed and/or discernable period of time. Without waiver of the foregoing objections, W. Andrew Willoughby and Tom Bryd from GRI and its attorneys Phillip Weener and Eric Nathan with the law firm Weener and Nathan, LLP negotiated the LAHC contract on behalf of GRI. GRI is not certain who may have been involved on behalf of LAHC, aside from Charlie Calvi and Greg Cromer.

INTERROGATORY NO. 5:

Has GRI had any personal, professional, business or other relationship of any kind with any of the Defendants in this litigation, including any employee, director, or officer of any of the other Defendants, or any entity related to any of the Defendants? If so, identify the person with whom GRI had a relationship and describe the nature of the relationship.

ANSWER TO INTERROGATORY NO. 5:

GRI objects to Interrogatory No. 5 as being excessively vague, overly broad, unduly burdensome and to the extent it is not limited to a fixed and/or discernable period of time. GRI also objects to Interrogatory No. 5 as being excessively vague as to what is contemplated by the use of the term "relationship." Without waiver of the foregoing objections, aside from the work GRI performed for LAHC, GRI responds that, several decades ago, Charlie Calvi owned and/or managed a PPO network, Best Care, in Louisiana, which was utilized by at least one of GRI's clients. Otherwise, GRI is not aware of any personal, professional, business or other relationship, as GRI understands that term, with any of the Defendants in this litigation or any entity related to any of the Defendants.

INTERROGATORY NO. 6:

Please identify by name, address, telephone number, position, and current employer all persons at CMS that you communicated with regarding LAHC.

ANSWER TO INTERROGATORY NO. 6:

GRI objects to Interrogatory No. 6 as being excessively vague, overly broad, unduly burdensome and to the extent it is not limited to a fixed and/or discernable period of time. Without waiver of the foregoing objections, GRI is not aware of the names, addresses, or phone numbers of the specific people with CMS that it communicated with regarding LAHC. GRI personnel occasionally received or were forwarded "blast" emails from CMS. GRI personnel also occasionally communicated with IT or tech support personnel from CMS to discuss issues associated with file transfers. Additionally, W. Andrew Willoughby was interviewed by a CMS representative in LAHC's offices sometime after LAHC went into receivership, but does not recall the identity of the individual who conducted the interview.

INTERROGATORY NO. 7:

Please identify by name, address, telephone number, position, and current employer all persons at the Louisiana Department of Insurance that you communicated with regarding LAHC.

ANSWER TO INTERROGATORY NO. 7:

GRI objects to Interrogatory No. 7 as being excessively vague, overly broad, unduly burdensome and to the extent it is not limited to a fixed and/or discernable period of time. Without waiver of the foregoing objections, GRI is not aware of the names, addresses, phone numbers of those individuals it communicated with at the DOI regarding LAHC. At times, GRI personnel responded to a generic LDI address in connection with provider or member complaints about LAHC. Mr. Willoughby also spoke to LDI representatives on some of his visits to LAHC's offices, but did not keep a record of the identities of those LDI representatives.

INTERROGATORY NO. 8:

Please identify all other Consumer Operated and Oriented Plans, other than LAHC, for which you have performed TPA services.

ANSWER TO INTERROGATORY NO. 8:

GRI has not performed TPA services for any Consumer Operated and Oriented Plans other than LAHC.

INTERROGATORY NO. 9:

Please identify all other health insurers, other than LAHC, for which you have performed TPA services.

ANSWER TO INTERROGATORY NO. 9:

GRI objects to Interrogatory No. 9 as being excessively vague, overly broad, unduly burdensome and to the extent it is not limited to a fixed and/or discernable period of time. Subject to the foregoing objection, GRI did not provide third party administrative services to any other health insurers during the time when LAHC was GRI's client, and GRI does not currently provide third party administrative services to any health insurers.

INTERROGATORY NO. 10:

Please identify all witnesses you will or may call at the trial of this matter and describe the anticipated testimony of each.

ANSWER TO INTERROGATORY NO. 10:

GRI objects to Interrogatory No. 10 as being premature. Discovery is just starting and GRI has not yet identified the witnesses it may call to testify at trial. However, it may call any witness identified during discovery in this case, any witness called and/or listed by any other party, any witness needed to authenticate evidence at trial, any impeachment and rebuttal witnesses. GRI reserves the right to supplement and amend this response.

INTERROGATORY NO. 11:

Please identify all expert witnesses you have retained in connection with this matter, including for each an identification of the subject matter for which the expert has been retained, the substance of the opinion(s) rendered by the expert, and a summary of the grounds for each opinion rendered by the expert.

ANSWER TO INTERROGATORY NO. 11:

GRI objects to Interrogatory No. 11 to the extent that it seeks discovery of expert information beyond that which is made discoverable under Louisiana Code of Civil Procedure article 1425. In particular, Interrogatory No. 11 appears to call for information about any expert witness consulted by GRI, without regard to whether the expert's opinions may be presented at trial. GRI will not provide information about any expert who is not expected to be called as a witness at trial unless and until Plaintiff satisfies the requirements set out in Louisiana Code of Civil Procedure article 1425(D)(2)-(3). GRI also objects to Interrogatory No. 11 on grounds that

it is premature. This case is in its earliest stages, and GRI has not yet identified the expert witnesses who it will or may call to testify in this matter. GRI will make its expert witness disclosures in compliance with any scheduling order that may be issued by the Court.

REQUESTS FOR PRODUCTION OF DOCUMENTS

REQUEST FOR PRODUCTION NO. 1:

Please produce all Documents and Communications referencing or related to work you performed for LAHC.

RESPONSE TO REQUEST NO. 1:

GRI objects to Request No. 1 as being excessively vague, overly broad and unduly burdensome and to the extent it is not limited to a specific and discernable period of time, and to the extent that Plaintiff is in a superior position to obtain this information since it physically seized all of the records, servers, etc. regarding LAHC in the possession of GRI prior to filing this suit against GRI. Without waiver of the foregoing objections, GRI will produce any non-privileged, responsive documents in its possession, custody or control.

REQUEST FOR PRODUCTION NO. 2:

Please produce all Documents and Communications relied upon or reviewed by you in performing work for LAHC.

RESPONSE TO REQUEST NO. 2:

GRI objects to Request No. 2 as being excessively vague, overly broad, unduly burdensome and to the extent it is not limited to a specific and discernable period of time. GRI also objects to this request to the extent that Plaintiff is in a superior position to obtain this information since it physically seized all of the records, servers, etc. regarding LAHC in the possession of GRI prior to its filing suit against GRI. Without waiver of the foregoing objections, GRI will produce any non-privileged, responsive documents in its possession, custody or control.

REQUEST FOR PRODUCTION NO. 3:

Please produce any and all Documents and Communications pertaining to the training, licensure, and certification of GRI personnel, employees, agents, or other representatives who performed TPA services for LAHC.

RESPONSE TO REQUEST NO. 3:

GRI objects to Request No. 3 as being excessively vague, overly broad, unduly burdensome and to the extent it is not limited to a specific and discernable period of time. GRI

further objects that it uses some of its training materials subject to a license from the publisher that prevents GRI from disclosing the materials. Without waiver of the foregoing objections GRI will produce any non-privileged, responsive documents in its possession, custody or control.

REQUEST FOR PRODUCTION NO. 4:

Please produce all Documents you received from or provided to LAHC.

RESPONSE TO REQUEST NO. 4:

GRI objects to Request No. 4 as being excessively vague, overly broad and unduly burdensome and to the extent it is not limited to a specific and discernable period of time. GRI further objects to this request to the extent that Plaintiff is in a superior position to obtain this information since it physically seized all of the records, servers, etc. regarding LAHC in the possession of GRI prior to filing this suit against GRI. Without waiver of the foregoing objections, GRI will produce any non-privileged, responsive documents in its possession, custody or control.

REQUEST FOR PRODUCTION NO. 5:

Please produce all Communications by and between GRI and LAHC. This request includes Communications sent directly to or from GRI or on GRI's behalf.

RESPONSE TO REQUEST NO. 5:

GRI objects to Request No. 5 as being excessively vague, overly broad and unduly burdensome and to the extent it is not limited to a specific and discernable period of time. GRI further objects to this request to the extent that Plaintiff is in a superior position to obtain this information since it physically seized all of the records, servers, etc. regarding LAHC in the possession of GRI prior to filing this suit against GRI. GRI will produce any non-privileged, responsive documents in its possession, custody or control.

REQUEST FOR PRODUCTION NO. 6:

Please produce all Documents and Communications referencing or related to any criticism or reprimand of any current or former employee, officer, director, agent or other representative of GRI that in any way concerns the work performed for LAHC.

RESPONSE TO REQUEST NO. 6:

GRI objects to Request No. 6 as being excessively vague, overly broad and unduly burdensome and to the extent it is not limited to a specific and discernable period of time. Without waiver of the foregoing objection, GRI is not aware of any documents responsive to this request.

REQUEST FOR PRODUCTION NO. 7:

Please produce all agreements, promissory notes, contracts, loans, or writings of any kind related to any agreement that GRI has entered into with any of the Defendants in this litigation, or any entity related to any of the Defendants, at any time during the last ten (10) years, including all detailed terms, schedules, interim calculations and other such documents. This request also includes, but is not limited to, any engagement letters and amendments to contracts or other agreements.

RESPONSE TO REQUEST NO. 7:

GRI is not aware of any documents responsive to this request.

REQUEST FOR PRODUCTION NO. 8:

Please produce all Documents you received from or provided to any employee, director, officer, shareholder, agent, attorney, or other representative of any of the Defendants in this litigation, or any entity related to any of the Defendants, regarding or referencing LAHC.

RESPONSE TO REQUEST NO. 8:

GRI objects to Request No. 8 as being excessively vague, overly broad, unduly burdensome and to the extent it is not limited to a specific and discernable period of time. GRI further objects to this request to the extent that Plaintiff is in a superior position to obtain this information since it physically seized all of the records, servers, etc. regarding LAHC in the possession of GRI prior to filing this suit against GRI. Without waiver of the foregoing objections, GRI is will produce any non-privileged, responsive documents in its possession, custody or control.

REQUEST FOR PRODUCTION NO. 9:

Please produce all Communications between GRI and any of the Defendants in this litigation, or any entity related to any of the Defendants, regarding or referencing LAHC. This request includes Communications sent directly to or from GRI or on GRI's behalf.

RESPONSE TO REQUEST NO. 9:

GRI objects to Request No. 9 as being excessively vague, overly broad, unduly burdensome, to the extent it is not limited to a specific and discernable period of time, and to the extent that Plaintiff is in a superior position to obtain this information since it physically seized all of the records, servers, etc. regarding LAHC in the possession of GRI prior to filing this suit against

GRI. Without waiver of the foregoing objections, GRI will produce any non-privileged, responsive documents in its possession, custody or control.

REQUEST FOR PRODUCTION NO. 10:

Please produce all Documents referencing or related to LAHC that you received from or provided to any other individual or entity, including but not limited to CMS and/or Ochsner Health System.

RESPONSE TO REQUEST NO. 10:

GRI objects to Request No. 10 as being excessively vague, overly broad, unduly burdensome, to the extent it is not limited to a specific and discernable period of time, and to the extent that Plaintiff is in a superior position to obtain this information since it physically seized all of the records, servers, etc. regarding LAHC in the possession of GRI prior to filing this suit against GRI. Without waiver of the foregoing objections, GRI will produce any non-privileged, responsive documents in its possession, custody or control.

REQUEST FOR PRODUCTION NO. 11:

Please produce all Communications by and between GRI and any other individual or entity, including but not limited to CMS and/or Ochsner Health System, referencing or related to LAHC. This request includes Communications sent directly to or from GRI or on GRI's behalf.

RESPONSE TO REQUEST NO. 11:

GRI objects to Request No. 11 as being excessively vague, overly broad, unduly burdensome and to the extent it is not limited to a specific and discernable period of time, and to the extent that Plaintiff is in a superior position to obtain this information since it physically seized all of the records, servers, etc. regarding LAHC in the possession of GRI prior to filing this suit against GRI. Without waiver of the foregoing objections, GRI will produce any non-privileged, responsive documents in its possession, custody or control.

REQUEST FOR PRODUCTION NO. 12:

Please produce all agreements, promissory notes, contracts, loans, or writings of any kind related to any agreement that GRI has entered into with LAHC, including all detailed terms, schedules, interim calculations and other such documents. This request also includes, but is not limited to, any engagement letters and amendments to contracts or other agreements.

RESPONSE TO REQUEST NO. 12:

GRI objects to Request No. 12 as being excessively vague, overly broad, unduly burdensome and to the extent that it calls for legal conclusions and is not limited to a specific and discernable period of time. Plaintiff is in a superior position to obtain this information since it physically seized all of the records, servers, etc. regarding LAHC in the possession of GRI prior to filing this suit against GRI. Without waiver of the foregoing objections, GRI will produce any non-privileged, responsive documents in its possession, custody or control.

REQUEST FOR PRODUCTION NO. 13:

Please produce all Documents evidencing all payments of any kind by LAHC to GRI, regardless of form.

RESPONSE TO REQUEST NO. 13:

GRI will produce any non-privileged, responsive documents in its possession, custody or control.

REQUEST FOR PRODUCTION NO. 14:

Please produce all Documents reflecting incentives, commissions, contingencies and/or bonuses for any employee, director, officer, agent or other representative of GRI who performed work for LAHC.

RESPONSE TO REQUEST NO. 14:

GRI is not aware of any documents responsive to this request.

REQUEST FOR PRODUCTION NO. 15:

Please produce all Documents and Communications related to any meetings, whether telephonic, in-person, or otherwise, pertaining to LAHC, including but not limited to internal meetings.

RESPONSE TO REQUEST NO. 15:

GRI objects to Request No. 15 as being excessively vague, overly broad, unduly burdensome, is not limited to a specific and discernable period of time, and to the extent it seeks information that is confidential, privileged and protected by the attorney client privilege and work product doctrine. Without waiver of the foregoing objections, GRI will produce any non-privileged, responsive documents in its possession, custody or control.

REQUEST FOR PRODUCTION NO. 16:

Please produce all Communications by and between GRI and any employee, agent or other representative of CMS regarding LAHC. This request includes Communications sent directly to or from GRI or on GRI's behalf.

RESPONSE TO REQUEST NO. 16:

GRI objects to Request No. 16 as being excessively vague, overly broad, unduly burdensome, not limited to a specific and discernable period of time, and to the extent that Plaintiff is in a superior position to obtain this information since it physically seized all of the records, servers, etc. regarding LAHC in the possession of GRI prior to filing this suit against GRI. GRI also objects to Request No. 16 to the extent that it is duplicative of Request No. 11. Without waiver of the foregoing objections, GRI will produce any non-privileged, responsive documents in its possession, custody or control.

REQUEST FOR PRODUCTION NO. 17:

Please produce all Communications by and between GRI and any employee, agent or other representative of the Louisiana Department of Insurance regarding LAHC. This request includes Communications sent directly to or from GRI or on GRI's behalf.

RESPONSE TO REQUEST NO. 17:

GRI objects to Request No. 17 as being excessively vague, overly broad, unduly burdensome, not limited to a specific and discernable period of time, and to the extent that Plaintiff is in a superior position to obtain this information since it physically seized all of the records, servers, etc. regarding LAHC in the possession of GRI prior to filing this suit against GRI. Without waiver of the foregoing objections, GRI will produce any non-privileged, responsive documents in its possession, custody or control.

REQUEST FOR PRODUCTION NO. 18:

Please produce all Documents and Communications related to any software, servers, or other such systems that you utilized or developed to process enrollment, eligibility, or claims handling for LAHC.

RESPONSE TO REQUEST NO. 18:

GRI objects to Request No. 18 as being excessively vague, overly broad, unduly burdensome, not limited to a specific and discernable period of time, and to the extent that Plaintiff is in a superior position to obtain this information since it physically seized all of the records, servers, etc. regarding LAHC in the possession of GRI prior to filing this suit against GRI. Without

waiver of the foregoing objections, GRI will produce any non-privileged, responsive documents in its possession, custody or control.

REQUEST FOR PRODUCTION NO. 19:

Please produce all insurance policies that may insure you for the damages alleged by the plaintiff in this matter.

RESPONSE TO REQUEST NO. 19:

GRI is producing the responsive documents.

REQUEST FOR PRODUCTION NO. 20:

Please produce all Documents sufficient to identify case styles, captions, parties, attorneys for parties and nature of claims and defenses of all litigation to which GRI is or has been a party, within the last ten (10) years.

RESPONSE TO REQUEST NO. 20:

GRI objects to Request No. 20 as being overly broad and unduly burdensome, particularly given that the documents requested are publicly available and have marginal, if any, relevance to the subject matter involved in this action. In the spirit of cooperation, however, GRI has prepared of list of matters to which it has been a party within the last ten years, which it has attached as Exhibit "A" to these Responses.

REQUEST FOR PRODUCTION NO. 21:

Please produce all Documents and Communications which you contend support your defenses to any of Plaintiff's claims in this matter.

RESPONSE TO REQUEST NO. 21:

GRI objects to Request No. 21 as being premature. Discovery has just begun in this matter, and GRI has not yet identified the documents that support its defenses to Plaintiff's claims in this matter. GRI believes that its production in response to many of the requests above will include documents response to Request No. 21. Moreover, Plaintiff is in a superior position to obtain documents responsive to this request since it physically seized all of the records, servers, etc. regarding LAHC in the possession of GRI prior to filing this suit against GRI. GRI reserves the right to supplement and amend this response.

REQUEST FOR PRODUCTION NO. 22:

Please produce all Documents you intend to offer as an exhibit or demonstrative aid at the trial of or any hearing in this matter.

RESPONSE TO REQUEST NO. 22:

GRI objects to Request No. 22 as being premature. Discovery has just begun in this matter, and GRI has not yet identified the documents that it may offer as exhibits or demonstrative aids at the trial of this matter. Moreover, Plaintiff is in a superior position to obtain documents responsive to this request since it physically seized all of the records, servers, etc. regarding LAHC in the possession of GRI prior to filing this suit against GRI. GRI reserves the right to supplement and amend this response.

REQUEST FOR PRODUCTION NO. 23:

Please produce all witness statements.

RESPONSE TO REQUEST NO. 23:

GRI objects to Request No. 23 to the extent it seeks information that is confidential, privileged and protected by the work product doctrine as well as protected from disclosure as having been prepared in anticipation of litigation.

REQUEST FOR PRODUCTION NO. 24:

For all experts identified in response to the accompanying Interrogatories, please produce their curriculum vitae and all Documents and Communications relating to this case and contained in the files of each expert.

RESPONSE TO REQUEST NO. 24:

GRI refers Plaintiff to GRI's Answer to Interrogatory No. 11.

REQUEST FOR PRODUCTION NO. 25:

Produce each and every Document that you will or may use, introduce, or discuss at the trial of this matter.

RESPONSE TO REQUEST NO. 25:

GRI objects to Request No. 25 on grounds that it is duplicative of Request No. 22, and refers Plaintiff to GRI's Response to Request No. 22.

REQUEST FOR PRODUCTION NO. 26:

To the extent not produced in response to the preceding requests, please produce all Documents and Communications prepared, generated, or created by you that pertain to LAHC.

RESPONSE TO REQUEST NO. 26:

GRI objects to Request No. 26 as being excessively vague, overly broad and unduly burdensome, not limited to a specific and discernable period of time and seeks information that is

confidential, privileged and protected by the attorney client privilege and by the work product doctrine and/or information protected as having been prepared in anticipation of litigation. Without waiver of the foregoing objections, GRI will produce any non-privileged, responsive documents in its possession, custody or control.

REQUEST FOR PRODUCTION NO. 27:

To the extent not produced in response to the preceding requests, please produce all Documents and Communications in any and all files that have been maintained by GRI in any location in the name of or related to one or more of the following: LAHC; and/or any of the other Defendants in this litigation.

RESPONSE TO REQUEST NO. 27:

GRI objects to Request No. 27 as being excessively vague, overly broad, unduly burdensome, not limited to a specific and discernable period of time, and to the extent that Plaintiff is in a superior position to obtain this information since it physically seized all of the records, servers, etc. regarding LAHC in the possession of GRI prior to filing this suit against GRI. Without waiver of the foregoing objections, GRI will produce any non-privileged, responsive documents in its possession, custody or control.

By Attorneys,



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Facsimile: (225) 490-5860
Email: bmason@stonepigman.com

*Attorneys for Defendant, Group Resources,
Inc.*

CERTIFICATE

I HEREBY CERTIFY that a copy of the foregoing pleading has been served upon all counsel of record by placing same in the United States mail, postage prepaid and properly addressed, this 7th day of February, 2018.



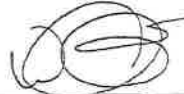
W. BRETT MASON

VERIFICATION

STATE OF GEORGIA

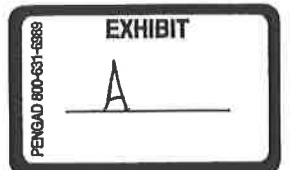
COUNTY OF GWINNETT

I, W. Andrew Willoughby, Vice President and Chief Operating Office of Group Resources, Inc., hereby declare and verify under penalty of perjury that the foregoing Answers to Interrogatories are true and correct to the best of my knowledge, information and belief.



W. ANDREW WILLOUGHBY

Plaintiff	Defendant	Venue	Case ID	Claim	Disposition	Date Case Filed
Adventist Health System/Sunbelt, Inc., d/b/a Central Texas Medical Center	v Group Resources of Texas, LLC	District Court of Hays County, Texas, 274 Judicial District	09-0959	Lawsuit concerned medical services provided a patient that was purported to have health insurance coverage that was issued/administered by GRI	Case Dismissed 9/22/09	6/8/2009
Baylor Health Care System	v Group Resources, Inc	US District Court, Northern District of Texas, Dallas Division	3:08-cv-00954-G		Resolved/Dismissed 11/2009	6/6/2008
Carla Nipper and Leo Nipper, as husband and wife	v Mollie Hunt	Circuit Court of Fourth Judicial Circuit, Duval County, FL	2015-CA-001502	3rd Party Subpoena 8/1/2017	Produced Docs re paid claims of Plaintiff	
Certified Emergency Medicine Specialists	v Theresa Chrismen, Defendant and Group Resources, Inc, Third-Party Defendant	District Court, State of Michigan, 62-A Judicial District, Kent County	15-1507-GC			9/8/2015
Citizens Trust Bank	v Atlanta International R.M.I., Inc., Kathleen W. Carlson and Group Resources Incorporated	Superior Court of Fulton County, GA	2010CV185932	Client sued broker over perceived misrepresentation of renewal for 2009-2010 plan year	Settled	5/20/2010
Cook Children's Health Care System and SW & JW Individually and on behalf of their minor child, JW	v Nocona General Hospital Employee Health Benefit Plan and Group Resources, Inc.	District Court of Tarrant County, Texas	236-284646-16		Ongoing	3/31/2016
Davidow Financial & Insurance Services, Inc. a California Corporation	v Roger Benefit Group, Inc., a Minnesota Corporation; Group Resources Incorporated, a Georgia Corporation	Superior Court of Maricopa County, AZ	CV2016-010422		Ongoing	12/30/2016
Group Resources Inc	v J. Smith Lanier & Co.	Superior Court of Fulton County, GA	2015CV269028		Order Granted Def's MSJ	12/9/2015
Group Resources Inc	v City of Waycross and Raphael Maddox, City Manager for City of Waycross	Superior Court of Ware County, GA	14V-0837		Order Granted Def's MSJ / Appeal to Court of Appeals of Georgia - A17A1699 - Pending	
Group Resources Inc	v Jamion Rlden	Magistrate Court of Gwinnett County, GA	17M13125	Dipossessory	Dismissed/Settled 5/2017	5/1/2017
Group Resources Inc	v Jamion Rlden	Magistrate Court of Gwinnett County, GA	17M37384	Dipossessory	Judgment for Plaintiff 11/2017	11/15/2017
Group Resources Inc	v Rlden QSR, Inc. and Jamion Rlden	State Court of Gwinnett County, GA		Collection Action	Ongoing	
Group Resources Incorporated	v Kliger-Weiss Infosystems Inc	Magistrate Court of Fulton County, GA	09MS-101498	Defendant failed to pay for run out administrative services	Judgment on behalf of Plaintiff / Fifa Issued	10/16/2009
Harold Bruce Hamilton, M.D., P.A. and Providence Health Care Service of Waco	v Group Resources, Inc., Purvis Industries, Ltd and Purvis PT, LLC	US District Court, Western District of Texas	W11CA181	Claims paid according to Client's Plan Document and direction. Client's counsel represented GRI concurrently	Settled/dissmissed 1/2012	6/28/2011
James J. Donelon, Commissioner of Insurance for the State of Louisiana, in his Capacity as Rehabilitator of Louisiana, Inc.	v 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	19th Judicial District Court of Parish of East Baton Rouge, State of Louisiana	Suit No. 651-069, Section 22		Ongoing	8/31/2016
Jessica Davis	v Mitchell County, Group Resources Inc., Thomas S. Byrd, Jackie Batchelor	US District Court, Middle District of Georgia, Albany Division	1:16-cv-00202-WLS		Waiting on dismissal of GRI and Thomas Byrd	11/4/2016
Kindred Hospitals East, LLC d/b/a Kindred Hospital-North Florida	v Group Resources Incorporated	US District Court, Middle District of Florida, Jacksonville Division	3:13-cv-750-J-99-TJC-JBT	Benefits changed on 1/1/12 for a patient hospitalized at their facility. They contend they should have been informed of benefit change proactively	Settled 1/2015	6/26/2013



Memorial Hermann Hospital System	v	Braidwood Management, Inc., Employee Benefit Plan, Private Healthcare Systems, Inc., a Subsidiary of Multiplan, Inc. and Group Resources, Inc.	District Court of Tarrant County, Texas	2012-62053 / Court: 334	Provider filed suit for full charges as claim was paid according to Plan at percentage of Medicare	Removed to Federal Court (see below)	10/18/2012
Memorial Hermann Hospital System	v	Braidwood Management, Inc., Employee Benefit Plan, Private Healthcare Systems, Inc., a Subsidiary of Multiplan, Inc. and Group Resources, Inc.	District Court of Harris County, Texas	4:12-cv-03453	Provider filed suit for full charges as claim was paid according to Plan at percentage of Medicare	Settled 6/2014	
Neil C. Gordon, Chapter 7 Trustee for the Estates of Metadigm Services, Inc., Metadigm Holding Inc., Metadigm Engineering, Inc., STS Leasing LLC, Specialized Technical Services, Inc., Lepservice, Inc. and SFC Leasing, Inc.(Chp 7 Debtors)	v	GRI	US Bankruptcy Court, Northern District of Georgia, Atlanta Division	Adversary Proceeding: 15-05161-crm		Dismissed 1/2018	3/13/2015
Shanisty Ireland, an Individual	v	Group Resources, Inc.	US District Court, Northern District of Alabama, Southern Division	2:13-cv-00946-TMP	Plaintiff filed suit for denial of claims under her employer's plan	GRI dismissed as Incorrectly named 12/2013	5/20/2013
Team One Logistics	v	Group Resources, Inc.	Superior Court of Gwinnett County, GA	15-A-01172-1		Dismissed 10/2015	1/27/2015
Texas Neurological and Pain Institute and Providence Health Care Service of Waco	v	Group Resources, Inc., Purvis Industries, Ltd and Purvis PT, LLC	US District Court, Western District of Texas	W11CA121	Claims paid according to Client's Plan Document and direction. Client's counsel represented GRI concurrently	Settled 2012	5/17/2011
Trinity Health-Michigan, d/b/a St. Mary's Health Services	v	Group Resources Incorporated	61st Judicial District Court, State of Michigan	13-GC-3813	Client failed to timely fund claim, provider sued GRI	Settled / Dismissed 11/8/13	8/22/2013

19th JUDICIAL DISTRICT COURT
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, et al

**FIRST SUPPLEMENTAL AND AMENDED RESPONSES
TO PLAINTIFF'S REQUESTS FOR PRODUCTION OF
DOCUMENTS PROPOUNDED TO GROUP RESOURCES INCORPORATED**

Defendant, Group Resources, Inc. (hereinafter "GRI" and/or "Defendant"), through undersigned counsel, submits the following First Supplemental Response to the Requests for Production of Documents (the "Requests") of Plaintiff, James J. Donelon, Commissioner of Insurance for the State of Louisiana, in his capacity as Rehabilitator of Louisiana Health Cooperative, Inc. ("LAHC" and/or "Plaintiff").

GENERAL AND SPECIFIC OBJECTIONS

1. Defendant objects to the Discovery Requests to the extent that they seek information or documents which are subject to the attorney-client privilege, the work-product doctrine, or both, or any other applicable privilege, protection, exemption or immunity.
2. Defendant objects to any instructions and definitions preceding or incorporated into the Discovery Requests to the extent that they exceed or are inconsistent with, or purport to impose burdens or duties upon Defendant greater than, the Local Rules, the Louisiana Code of Civil Procedure and any applicable jurisprudence. Defendant shall respond to the Discovery Requests in accordance with the Local Rules, the Louisiana Code of Civil Procedure and applicable jurisprudence.

**FIRST SUPPLEMENTAL RESPONSES TO
REQUESTS FOR PRODUCTION OF DOCUMENTS**

REQUEST FOR PRODUCTION NO. 1:

Please produce all Documents and Communications referencing or related to work you performed for LAHC.



SUPPLEMENTAL RESPONSE TO REQUEST NO. 1:

GRI objects to Request No. 1 as being excessively vague, overly broad and unduly burdensome and to the extent it is not limited to a specific and discernable period of time, and to the extent that Plaintiff is in a superior position to obtain this information since it physically seized all of the records, servers, etc. regarding LAHC in the possession of GRI prior to filing this suit against GRI. Without waiver of the foregoing objections, GRI will produce any non-privileged, responsive documents in its possession, custody or control. See generally GRI00000001-00053410 and GRI00069810-00347610.

REQUEST FOR PRODUCTION NO. 2:

Please produce all Documents and Communications relied upon or reviewed by you in performing work for LAHC.

SUPPLEMENTAL RESPONSE TO REQUEST NO. 2:

GRI objects to Request No. 2 as being excessively vague, overly broad, unduly burdensome and to the extent it is not limited to a specific and discernable period of time. GRI also objects to this request to the extent that Plaintiff is in a superior position to obtain this information since it physically seized all of the records, servers, etc. regarding LAHC in the possession of GRI prior to its filing suit against GRI. Without waiver of the foregoing objections, GRI will produce any non-privileged, responsive documents in its possession, custody or control. See generally GRI00000001-00053410 and GRI00069810-00347610.

REQUEST FOR PRODUCTION NO. 3:

Please produce any and all Documents and Communications pertaining to the training, licensure, and certification of GRI personnel, employees, agents, or other representatives who performed TPA services for LAHC.

SUPPLEMENTAL RESPONSE TO REQUEST NO. 3:

GRI objects to Request No. 3 as being excessively vague, overly broad, unduly burdensome and to the extent it is not limited to a specific and discernable period of time. GRI further objects that it uses some of its training materials subject to a license from the publisher that prevents GRI from disclosing the materials. Without waiver of the foregoing objections GRI will produce any non-privileged, responsive documents that are not subject to the license. See generally GRI00347611-00347635.

REQUEST FOR PRODUCTION NO. 4:

Please produce all Documents you received from or provided to LAHC.

SUPPLEMENTAL RESPONSE TO REQUEST NO. 4:

GRI objects to Request No. 4 as being excessively vague, overly broad and unduly burdensome and to the extent it is not limited to a specific and discernable period of time. GRI further objects to this request to the extent that Plaintiff is in a superior position to obtain this information since it physically seized all of the records, servers, etc. regarding LAHC in the possession of GRI prior to filing this suit against GRI. Without waiver of the foregoing objections, GRI will produce any non-privileged, responsive documents in its possession, custody or control. See generally GRI00053411-00060141 and GRI00347636-00384684.

REQUEST FOR PRODUCTION NO. 5:

Please produce all Communications by and between GRI and LAHC. This request includes Communications sent directly to or from GRI or on GRI's behalf.

SUPPLEMENTAL RESPONSE TO REQUEST NO. 5:

GRI objects to Request No. 5 as being excessively vague, overly broad and unduly burdensome and to the extent it is not limited to a specific and discernable period of time. GRI further objects to this request to the extent that Plaintiff is in a superior position to obtain this information since it physically seized all of the records, servers, etc. regarding LAHC in the possession of GRI prior to filing this suit against GRI. GRI will produce any non-privileged, responsive documents in its possession, custody or control. See generally GRI00053411-00060141 and GRI00347636-00384684.

REQUEST FOR PRODUCTION NO. 6:

Please produce all Documents and Communications referencing or related to any criticism or reprimand of any current or former employee, officer, director, agent or other representative of GRI that in any way concerns the work performed for LAHC.

SUPPLEMENTAL AND AMENDED RESPONSE TO REQUEST NO. 6:

GRI objects to Request No. 6 as being excessively vague, overly broad and unduly burdensome and to the extent it is not limited to a specific and discernable period of time. Without

waiver of the foregoing objection, GRI will produce any non-privileged, responsive documents in its possession, custody or control. See GRI00384685-00384691.

REQUEST FOR PRODUCTION NO. 8:

Please produce all Documents you received from or provided to any employee, director, officer, shareholder, agent, attorney, or other representative of any of the Defendants in this litigation, or any entity related to any of the Defendants, regarding or referencing LAHC.

SUPPLEMENTAL RESPONSE TO REQUEST NO. 8:

GRI objects to Request No. 8 as being excessively vague, overly broad, unduly burdensome and to the extent it is not limited to a specific and discernable period of time. GRI further objects to this request to the extent that Plaintiff is in a superior position to obtain this information since it physically seized all of the records, servers, etc. regarding LAHC in the possession of GRI prior to filing this suit against GRI. Without waiver of the foregoing objections, GRI will produce any non-privileged, responsive documents in its possession, custody or control. See generally GRI00060142-00061502 and GRI00384692-00392476.

REQUEST FOR PRODUCTION NO. 9:

Please produce all Communications between GRI and any of the Defendants in this litigation, or any entity related to any of the Defendants, regarding or referencing LAHC. This request includes Communications sent directly to or from GRI or on GRI's behalf.

SUPPLEMENTAL RESPONSE TO REQUEST NO. 9:

GRI objects to Request No. 9 as being excessively vague, overly broad, unduly burdensome, to the extent it is not limited to a specific and discernable period of time, and to the extent that Plaintiff is in a superior position to obtain this information since it physically seized all of the records, servers, etc. regarding LAHC in the possession of GRI prior to filing this suit against GRI. Without waiver of the foregoing objections, GRI will produce any non-privileged, responsive documents in its possession, custody or control. See generally GRI00060142-00061502 and GRI00384692-00392476.

REQUEST FOR PRODUCTION NO. 10:

Please produce all Documents referencing or related to LAHC that you received from or provided to any other individual or entity, including but not limited to CMS and/or Ochsner Health System.

SUPPLEMENTAL RESPONSE TO REQUEST NO. 10:

GRI objects to Request No. 10 as being excessively vague, overly broad, unduly burdensome, to the extent it is not limited to a specific and discernable period of time, and to the extent that Plaintiff is in a superior position to obtain this information since it physically seized all of the records, servers, etc. regarding LAHC in the possession of GRI prior to filing this suit against GRI. Without waiver of the foregoing objections, GRI will produce any non-privileged, responsive documents in its possession, custody or control. See generally GRI00061503-00067166 and GRI00392477-00413676.

REQUEST FOR PRODUCTION NO. 11:

Please produce all Communications by and between GRI and any other individual or entity, including but not limited to CMS and/or Ochsner Health System, referencing or related to LAHC. This request includes Communications sent directly to or from GRI or on GRI's behalf.

SUPPLEMENTAL RESPONSE TO REQUEST NO. 11:

GRI objects to Request No. 11 as being excessively vague, overly broad, unduly burdensome and to the extent it is not limited to a specific and discernable period of time, and to the extent that Plaintiff is in a superior position to obtain this information since it physically seized all of the records, servers, etc. regarding LAHC in the possession of GRI prior to filing this suit against GRI. Without waiver of the foregoing objections, GRI will produce any non-privileged, responsive documents in its possession, custody or control. See generally GRI00061503-00067166 and GRI00392477-00413676.

REQUEST FOR PRODUCTION NO. 12:

Please produce all agreements, promissory notes, contracts, loans, or writings of any kind related to any agreement that GRI has entered into with LAHC, including all detailed terms, schedules, interim calculations and other such documents. This request also includes, but is not limited to, any engagement letters and amendments to contracts or other agreements.

SUPPLEMENTAL RESPONSE TO REQUEST NO. 12:

GRI objects to Request No. 12 as being excessively vague, overly broad, unduly burdensome and to the extent that it calls for legal conclusions and is not limited to a specific and discernable period of time. Plaintiff is in a superior position to obtain this information since it physically seized all of the records, servers, etc. regarding LAHC in the possession of GRI prior to filing this suit against GRI. Without waiver of the foregoing objections, GRI will produce any non-privileged, responsive documents in its possession, custody or control. See generally GRI00067167-00067254 and GRI00413677-00413892.

REQUEST FOR PRODUCTION NO. 13:

Please produce all Documents evidencing all payments of any kind by LAHC to GRI, regardless of form.

SUPPLEMENTAL RESPONSE TO REQUEST NO. 13:

GRI will produce any non-privileged, responsive documents in its possession, custody or control. See GRI00067255-00067308 and GRI00413893-00414241.

REQUEST FOR PRODUCTION NO. 15:

Please produce all Documents and Communications related to any meetings, whether telephonic, in-person, or otherwise, pertaining to LAHC, including but not limited to internal meetings.

SUPPLEMENTAL RESPONSE TO REQUEST NO. 15:

GRI objects to Request No. 15 as being excessively vague, overly broad, unduly burdensome, is not limited to a specific and discernable period of time, and to the extent it seeks information that is confidential, privileged and protected by the attorney client privilege and work product doctrine. Without waiver of the foregoing objections, GRI will produce any non-privileged, responsive documents in its possession, custody or control. See generally GRI00067309-00068742 and GRI00414242-00417376.

REQUEST FOR PRODUCTION NO. 16:

Please produce all Communications by and between GRI and any employee, agent or other representative of CMS regarding LAHC. This request includes Communications sent directly to or from GRI or on GRI's behalf.

SUPPLEMENTAL RESPONSE TO REQUEST NO. 16:

GRI objects to Request No. 16 as being excessively vague, overly broad, unduly burdensome, not limited to a specific and discernable period of time, and to the extent that Plaintiff is in a superior position to obtain this information since it physically seized all of the records, servers, etc. regarding LAHC in the possession of GRI prior to filing this suit against GRI. GRI also objects to Request No. 16 to the extent that it is duplicative of Request No. 11. Without waiver of the foregoing objections, GRI will produce any non-privileged, responsive documents in its possession, custody or control. See generally GRI00068743-00069445 and GRI00417377-418302.

REQUEST FOR PRODUCTION NO. 17:

Please produce all Communications by and between GRI and any employee, agent or other representative of the Louisiana Department of Insurance regarding LAHC. This request includes Communications sent directly to or from GRI or on GRI's behalf.

SUPPLEMENTAL RESPONSE TO REQUEST NO. 17:

GRI objects to Request No. 17 as being excessively vague, overly broad, unduly burdensome, not limited to a specific and discernable period of time, and to the extent that Plaintiff is in a superior position to obtain this information since it physically seized all of the records, servers, etc. regarding LAHC in the possession of GRI prior to filing this suit against GRI. Without waiver of the foregoing objections, GRI will produce any non-privileged, responsive documents in its possession, custody or control. See GRI00418303-00418485.

REQUEST FOR PRODUCTION NO. 18:

Please produce all Documents and Communications related to any software, servers, or other such systems that you utilized or developed to process enrollment, eligibility, or claims handling for LAHC.

SUPPLEMENTAL RESPONSE TO REQUEST NO. 18:

GRI objects to Request No. 18 as being excessively vague, overly broad, unduly burdensome, not limited to a specific and discernable period of time, and to the extent that Plaintiff is in a superior position to obtain this information since it physically seized all of the records, servers, etc. regarding LAHC in the possession of GRI prior to filing this suit against GRI. Without waiver of the foregoing objections, GRI will produce any non-privileged, responsive documents in its possession, custody or control. See generally GRI00069446-00069539, GRI00069583-00069615, GRI00069637-00069809 and GRI00383893-00384851.

REQUEST FOR PRODUCTION NO. 19:

Please produce all insurance policies that may insure you for the damages alleged by the plaintiff in this matter.

SUPPLEMENTAL RESPONSE TO REQUEST NO. 19:

GRI is producing the responsive documents. See GRI00069540-00069582 and GRI00069616-00069636.

REQUEST FOR PRODUCTION NO. 26:

To the extent not produced in response to the preceding requests, please produce all Documents and Communications prepared, generated, or created by you that pertain to LAHC.

SUPPLEMENTAL RESPONSE TO REQUEST NO. 26:

GRI objects to Request No. 26 as being excessively vague, overly broad and unduly burdensome, not limited to a specific and discernable period of time and seeks information that is confidential, privileged and protected by the attorney client privilege and by the work product doctrine and/or information protected as having been prepared in anticipation of litigation. Without waiver of the foregoing objections, GRI will produce any non-privileged, responsive documents in its possession, custody or control. See generally GRI00000001-00053410 and GRI00069810-00347610.

REQUEST FOR PRODUCTION NO. 27:

To the extent not produced in response to the preceding requests, please produce all Documents and Communications in any and all files that have been maintained by GRI in any

location in the name of or related to one or more of the following: LAHC; and/or any of the other Defendants in this litigation.

SUPPLEMENTAL RESPONSE TO REQUEST NO. 27:

GRI objects to Request No. 27 as being excessively vague, overly broad, unduly burdensome, not limited to a specific and discernable period of time, and to the extent that Plaintiff is in a superior position to obtain this information since it physically seized all of the records, servers, etc. regarding LAHC in the possession of GRI prior to filing this suit against GRI. Without waiver of the foregoing objections, GRI will produce any non-privileged, responsive documents in its possession, custody or control. See generally GRI00000001-00053410 and GRI00069810-00347610.

By Attorneys,



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Attorneys for Defendant, Group Resources, Inc.

CERTIFICATE

I HEREBY CERTIFY that a copy of the foregoing Supplemental and Amended Responses to Plaintiff's Requests for Production of Documents has been served upon all counsel of record by placing same in the United States mail, postage prepaid and properly addressed, this 2nd day of June, 2020.

