

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

**REPLY MEMORANDUM IN SUPPORT OF MOTION TO COMPEL BY
GROUP RESOURCES, INC.**

MAY IT PLEASE THE COURT:

Defendant, Group Resources, Inc. ("GRI"), respectfully submits this Reply Memorandum to respond to several points raised by Plaintiff, James J. Donelon, Commissioner of Insurance for the State of Louisiana, in his capacity as Rehabilitator of Louisiana Health Cooperative ("LAHC"), in its Opposition Memorandum. First, GRI will clarify that defendants have *not* dumped documents like Plaintiff. GRI will then illustrate why Plaintiff's third party ESI vendor argument is irrelevant. Finally, GRI will explain why the expense associated with Plaintiff's document dump should be borne by Plaintiff and not shifted to others.

Plaintiff's Opposition Memorandum consists largely of an attempt to justify his discovery-related conduct by suggesting that he has merely done what GRI and other defendants have done. Even if that suggestion were true, it would not relieve Plaintiff of the obligations imposed by the Louisiana Code of Civil Procedure and enforced by Louisiana courts. But Plaintiff's characterization of defendants' discovery conduct in this case is not based in reality. GRI's productions thus far have been organized, bates numbered and limited to relevant, responsive information. A comparison of the size of the respective productions illustrates the disparity between the production of relevant and responsive information and a data dump. GRI's production consisted of approximately 58 GB of data. More importantly, and directly contrary to Plaintiff's representations in his Opposition Memorandum, GRI bates numbered all of the documents it produced and identified the specific requests to which those documents were responsive. See GRI's Responses to Plaintiff's Discovery Requests, a copy of which is attached

hereto as **Exhibit 1**. This orderly production entailed each GRI confirming the relevancy and responsiveness of the documents it produced and identifying the discovery request or requests to which they are responsive.

Plaintiff's production, on the other hand, is neither consistent (there are some documents bates numbered but a large portion of the production is not numbered at all, as Milliman notes in its Joinder and Memorandum of Law filed on June 16, 2020) nor limited to relevant and responsive information. Even the small portion of Plaintiff's document production that Plaintiff proudly promotes as having been Bates numbered appears to be a *complete* backup of LAHC's email server. It is apparent that Plaintiff made no effort to review those files and produce only the relevant information that is responsive to GRI's document requests. Instead, Plaintiff produced every email and attachment on LAHC's server, including SPAM and other "junk" email. A small sliver of the extraneous information included within the data Plaintiff dumped on defendants includes: a Facebook trending notice regarding Dominica and Justin Bieber, Lexis-Nexus quick tips, an ad for 25% off "brands you love" at Macy's, a newsletter entitled "New Orleans Agenda" promoting an article advocating for Washington, D.C.'s NFL franchise to change its nickname; a salary.com newsletter, a Sam's Club ad to "Shop our Outdoor Specials while Summer lasts!", an ad from Shoplet deals that promises items for "Working in Style", and a Walgreen's weekly deals notice with the subject "Up to 50% OFF Weekly Deals + buy your Red Nose today", collectively attached hereto in globo as **Exhibit 2**.

Even a cursory review of Plaintiff's production shows that Plaintiff put no thought into sorting the data that he produced to GRI and/or purging it of extraneous and non-responsive information like notices from Facebook. GRI propounded specific requests for production in an effort discover what relevant and responsive evidence Plaintiff has. In response, GRI and others received mountains of information cluttered with rubbish and unsearchable files.

Plaintiff appears to believe that all of these deficiencies should be excused because he provided "an itemization that identified: (a) the type of Folder/File being produced; (b) the source and description of that Folder/File; (c) the approximate size of that Folder/File; (d) the bates-number ranges associated with each Folder/File; and (e) the necessary access / password instructions to access each Folder / File." *See* Plaintiff's Opposition Memorandum at 9. But that itemization is not particularly helpful and certainly does not render Plaintiff compliant with his discovery obligations considering that (1) only 4 of the 84 folders contained documents that were

Bates labeled, (2) one of the folders containing Bates labeled documents contains the entire backup of LAHC's email server, consisting of more than 1,000,000 emails that Plaintiff made no effort to review for relevance or responsiveness, and (3) 64 of the folders "itemized" by Plaintiff contain the entire contents of former LAHC employees' computers, which again have not been searched for relevance or responsiveness. *See* Exhibit A to Plaintiff's Opposition Memorandum.

Plaintiff is also off base in arguing that he produced the documents at issue as they are kept in the usual course of business and in the form or forms in which it was ordinarily maintained. Instead, even in the Bates numbered portions of his production, Plaintiff converted documents (including emails, Excel spreadsheets, and Word documents, among others) from the forms in which they were ordinarily maintained and converted them into image files. Had Plaintiff actually produced those documents in the forms in which they are ordinarily maintained (i.e., as emails, Word documents, Excel documents, etc.), they would have been fully searchable and eliminated at least one of the issues raised in GRI's motion.

Furthermore, Plaintiff's arguments concerning his total lack of effort to identify and mark documents containing PHI are highly misleading. Plaintiff lauds himself for having designated "at least 1.2 million documents as 'CONFIDENTIAL PHI' pursuant to the Protective Order in this case. This representation appears to refer to Plaintiff's blanket designation of the entire contents of Folder 2 on Plaintiff's "itemization" as containing "CONFIDENTIAL PHI." *See* Exhibit A to Plaintiff's Opposition at p. 1. But that blanket designation does not rectify the fact that Plaintiff did not mark *any* of the other documents in his production as containing PHI. For example, Plaintiff marked exactly *zero* of the over 1,000,000 emails he produced from LAHC's server as containing confidential PHI, despite the fact there are emails in that production set that included PHI and other confidential information. *See* Ex. 3, in globo.

Plaintiff notes that every party and counsel is obligated to avoid disclosing PHI. That may be so, but it does not excuse the Plaintiff's complete lack of effort to identify the documents in his production set that included PHI. The December 13, 2017 Protective Order in this matter, on its very first page, clearly states that "*the party who produces any PHI is obligated to designate PHI* by marking the same as 'Confidential PHI' or with comparable language sufficient to notify the recipient that such documents may be PHI." December 13, 2017 Protective Order, ¶ 1 (emphasis added). Plaintiff's Opposition eliminates any doubt that Plaintiff is

attempting to shift that burden to GRI and the other defendants, which this Court should not permit him to do.

Finally, Plaintiff's broad accusations against GRI in connection with the parties' effort to identify a third party vendor to host all ESI are not only inflammatory but also irrelevant and should be disregarded. While Plaintiff attempts to paint a picture that GRI is somehow responsible for Plaintiff's discovery conduct, the truth is otherwise. First, Plaintiff's argument mischaracterizes the facts surrounding the parties' decision not to engage a joint ESI vendor. Contrary to Plaintiff's version of events, GRI did not singlehandedly torpedo that effort. One of the larger defendants determined that it had the ability and capacity to host its own data in-house and elected not to participate in the joint hosting project. That defendant's withdrawal would have substantially increased the cost per party of joint hosting. As a result, GRI elected to withdraw from the venture and no joint ESI vendor agreement materialized.

In any event, GRI's non-participation would not have prevented Plaintiff and the other defendants from engaging a joint vendor. GRI's participation in the proposed venture was neither necessary nor required and is not even relevant.

Most importantly, regardless of the circumstances that led to the decision not to engage a joint ESI vendor, the lack of a joint vendor does not excuse Plaintiff's failure to comply with his discovery obligations. Regardless of who hosts the data, each party has the obligation to produce only relevant, responsive information and no party may shirk that obligation to impose unnecessary costs on other parties by engaging in a document dump. Indeed, even if the parties had engaged a joint ESI vendor, it still would be improper for Plaintiff to run up the tab on all of the other parties by loading mountains of irrelevant, nonresponsive data (including Facebook updates about Justin Beiber and Macy's sale circulars) onto the shared ESI platform.

The problem here is not that GRI or any other party declined to participate in a joint ESI hosting agreement. The problem is that Plaintiff is unwilling to review the documents in his possession and (1) identify and produce the relevant documents that are responsive to the discovery propounded by GRI and the other defendants or (2) identify and mark the documents containing PHI. Instead, Plaintiff seeks to force GRI and the other defendants to bear the costs of culling through Plaintiff's document dump to find the responsive items and properly handle PHI. This is not permissible under Louisiana's discovery rules and should not be countenanced by this Court.

For the foregoing reasons and for those set forth in its original memorandum in support, GRI respectfully urges this Honorable Court to grant its motion to compel.

Respectfully submitted,

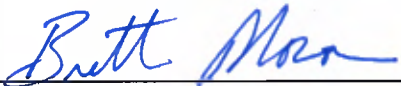


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Attorneys for Defendant, Group Resources, Inc.

CERTIFICATE

I hereby certify that a copy of the above and foregoing pleading was served upon all counsel of record by electronic mail and/or United States mail, postage pre-paid and properly addressed, this 25 day of June, 2020.



W. BRETT MASON

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

NO. 651,069

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**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
Suite 100
Duluth, GA 30097-4904
(678) 475-3606

Sheila Autry – Director of Claims
Group Resources
3080 Premiere Parkway
Suite 100
Duluth, GA 30097-4904
(678) 475-3627

Tom Byrd – President and Chief Executive Officer
Group Resources
3080 Premiere Parkway
Suite 100
Duluth, GA 30097-4904
(678) 475-3602

Michelle Craven – Benefit Advisor/Claims Examiner
Group Resources
3080 Premiere Parkway
Suite 100
Duluth, GA 30097-4904
(678) 475-3642

Patricia Money – Customer Service
Group Resources
3080 Premiere Parkway
Suite 100
Duluth, GA 30097-4904
(678) 475-3710

Janice Zamorano – Customer Service
Group Resources
3080 Premiere Parkway
Suite 100
Duluth, GA 30097-4904
(678) 475-3616

Aline Cook – Post claims process – auditing/voids/refunds
Group Resources
3080 Premiere Parkway
Suite 100
Duluth, GA 30097-4904
(678) 475-3659

Ryan Ryser – Check register production
Group Resources
3080 Premiere Parkway
Suite 100
Duluth, GA 30097-4904
(678) 475-3716

Becky Kirkland - Membership
Group Resources
3080 Premiere Parkway
Suite 100
Duluth, GA 30097-4904
(678) 475-3673

Debbie Bloodworth – Systems coordinator/supervisor of phone unit
Group Resources
3080 Premiere Parkway
Suite 100
Duluth, GA 30097-4904
(678) 475-3631

Mike Reed – Information Technology
Group Resources
3080 Premiere Parkway
Suite 100
Duluth, GA 30097-4904
(678) 475-3707

Steve Kemp – Information Technology
Group Resources
3080 Premiere Parkway
Suite 100
Duluth, GA 30097-4904
(678) 475-3676

Octavia Young - Membership
Group Resources
3080 Premiere Parkway
Suite 100
Duluth, GA 30097-4904

(678) 475-3680

Tamara Johnson – Claims gateway (supervision of scanning and verification) - auditing
Group Resources
3080 Premiere Parkway
Suite 100
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 responsive 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,



W. Brett Mason (La. Bar Roll No. 22511)
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301 Main Street
Baton Rouge, Louisiana 70825
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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.

Brett Mason

W. BRETT MASON

VERIFICATION

STATE OF GEORGIA

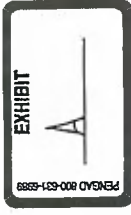
COUNTY OF GWINNETT

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 to patient that was purported to have health insurance coverage that was issued/administered by GRI	Case Dismissed 9/22/09	6/6/2009
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 Christman, Defendant and Group Resources, Inc. Third-Party Defendant	District Court, State of Michigan, 62-A Judicial District, Kent County	15-1507-GC	Client sued broker over perceived misrepresentation of renewal for 2009-2010 plan year		9/6/2015
Citizens Trust Bank	v Atlanta International R.M.I., Inc., Kathleen W. Carlson and Group Resources Incorporated	Superior Court of Fulton County, GA	2010CV185932		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
Dawdow Financial & Insurance Services, Inc., a California Corporation	v Roger Beneff Group, Inc., a Minnesota Corporation; Group Resources Incorporated, a Georgia Corporation	Superior Court of Maricopa County, AZ	CV2015-010422		Ongoing	12/30/2016
Group Resources Inc	v J. Smith, Lantier & Co.	Superior Court of Fulton County, GA	2015CV269028		Order Granted Def's MSJ	12/2/2015
Group Resources Inc	v 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	5/1/2017
Group Resources Inc	v Jamlon Riden	Magistrate Court of Gwinnett County, GA	17M13125	Dipossessory	Dismissed/Settled 5/2017	5/1/2017
Group Resources Inc	v Jamlon Riden	Magistrate Court of Gwinnett County, GA	17M37384	Dipossessory	Judgment for Plaintiff 11/2017	11/15/2017
Group Resources Inc	v Riden QSR, Inc. and Jamlon Riden	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 / File 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/Dismissed 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. Calvy, 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	Benefits changed on 1/1/12 for a patient hospitalized at their facility. They contend they should have been informed of benefit change proactively	Waiting on dismissal of GRI and Thomas Byrd	11/4/2016
Kindred Hospital's 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-750J-99-TJC-JBT		Settled 1/2015	6/6/2013



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 Neil C. Gordon, Chapter 7 Trustee for the Estates of Metadigm Services, Inc., Metadigm Holding Inc., Metadigm Engineering, Inc., SIS Leasing LLC, Specialized Technical Services, Inc., Leperservice, Inc. and SFC Leasing, Inc. (Chp 7 Debtors)	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-09453	Provider filed suit for full charges as claim was paid according to Plan at percentage of Medicare	Settled 6/2014	
	v. GRI	US Bankruptcy Court, Northern District of Georgia, Atlanta Division	Adversary Proceeding: 15-05161-rrm		Dismissed 3/2018	3/19/2015
Shanley Ireland, an individual Team One Leghites	v. Group Resources, Inc. v. Group Resources, Inc.	US District Court, Northern District of Alabama, Southern Division Superior Court of Gwinnett County, GA	2:13-cv-00946-TMP 15-A-04172-1	Plaintiff filed suit for denial of claims under her employer's plan	GRI dismissed as incorrectly named 12/2013 Dismissed 10/2015	5/20/2013 1/21/2015
Texas Neurological and Pain Institute and Providence Health Care Service of Waco Trinity Health-Michigan, d/b/a St. Mary's Health Services	v. Group Resources, Inc., Purvis Industries, Ltd and Purvis PT, LLC v. Group Resources Incorporated	US District Court, Western District of Texas 61st Judicial District Court, State of Michigan	WITCA121 13-GC-3813	Claims paid according to Client's Plan Document and direction. Client's counsel represented GRI Client failed to timely fund claim, provider sued GRI	Settled 2012 Settled / Dismissed 11/8/13	5/17/2011 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:

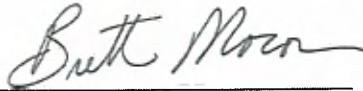
To the extent not produced in response to the preceding requests, please produce all Documents and Communications in any and all files that have been maintained by GRI in any

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,



W. Brett Mason (La. Bar Roll No. 22511)
Douglas J. Cochran (La. Bar Roll No. 20751)
Michael W. McKay (La. Bar Roll No. 9362)
Justin P. Lemaire (La. Bar Roll No. 29948)
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301 Main Street
Baton Rouge, Louisiana 70825
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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 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.



From: Facebook
Sent: Mon, 31 Aug 2015 4:22:31 PM GMT
To: Tricia Shaheen
Subject: Dominica and Justin Bieber are Trending on Facebook

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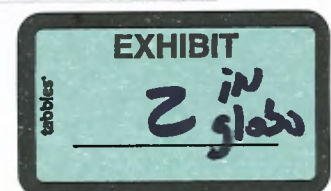
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To: sschwartz@mylahc.org
Subject: It's the big one: extra 25% off brands you love!

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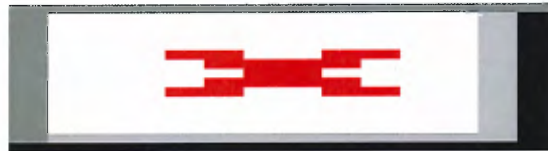


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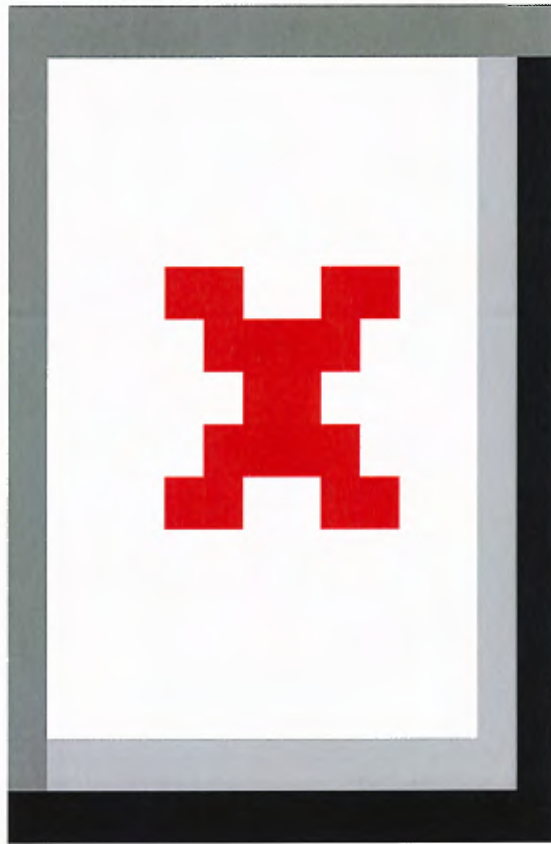
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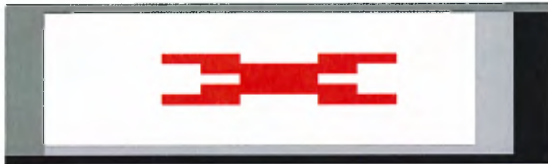
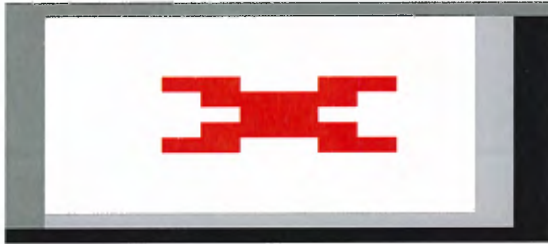
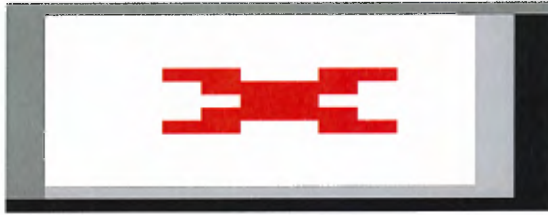
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From: The New Orleans Agenda - NUL To Be Equal Column #42
Sent: Wed, 16 Oct 2013 8:26:01 PM GMT
To: Anisha Williams
Subject: Marc Morial: Washington Football Team Should Drop the "R" Word



The New Orleans Agenda

Your Alternative Newsletter
News, Arts, Culture & Entertainment

Wednesday, October 16, 2013

For Immediate Release



Washington Football Team Should Drop the "R" Word

To Be Equal #42
Wednesday, October 16, 2013

Marc H. Morial
President and CEO
National Urban League



"At a moment when President Obama and Republican leaders remain deeply divided, this week saw them come to a bipartisan agreement on

LAHC_E_00566416

one thing: It is time for Washington's NFL team to stop using a racial slur and to finally change its name." Oneida Indian Nation radio ad

NEW YORK, NY - This past Sunday, as Dallas and Washington revived their annual NFL football rivalry, they also found themselves in the middle of an escalating fight over the name of the Washington football team. In fact, as part of its "Change the Mascot" campaign; the Oneida Indian Nation is running radio ads in Dallas and the other cities where the Washington football team is playing this year calling for DC's team to drop the "R" word from its name.

This is all part of a larger movement among civil rights organizations and political leaders from both the left and right who correctly point out that the term "Redskins" is a racial slur. Suzan Shown Harjo, a Native American woman who lives in Washington and directs the Morning Star Institute, has been leading this fight and others like it since the 1960s. President Obama recently weighed in, saying, "If I were the owner of the team and I knew that there was a name of my team-even if it had a storied history-that was offending a sizable group of people, I'd think about changing it." He added that he did not believe "attachment to a particular name should override the real, legitimate concerns that people have."

Team owner, Dan Snyder disagrees. He has vowed to never change the name and in a letter to season ticket holders last week he called the team name, "a badge of honor." Obviously not everyone agrees. The controversy has now gotten the attention of top NFL officials. NFL Commissioner Roger Goodell recently said, "If we are offending one person, we need to be listening and making sure that we're doing the right things to try to address that," And officials of the Oneida Indian Nation and the NFL are scheduled to meet next month to discuss the issue. Consistent with our commitment to equality and the dignity of every human being, the National Urban League stands with all those demanding the Washington football team stop using the R word.

Ray Halbritter, leader of the Oneida Indian Nation, recently stated his opposition this way: "Let's be clear, the R word is defined in the dictionary as an offensive term. It was the name that was used against our people when we were forced off our lands at gunpoint. So it is has a sordid history and it's time for a change." He added, "History is littered with people who have vowed never to change something - slavery, immigration, women's rights - so we think one thing that's really great about this country is when many people speak out, change can happen."

The Dallas vs. Washington football game this year was played on the eve of

Columbus Day, another reminder of the legacy of discrimination and oppression inflicted on Native Americans. Demanding the Washington football team remove the "R" word from its name is a simple request for respect. As the Oneida Indian Nation radio ad states, "This country may be politically divided...but we should all be able to agree that racial slurs are unacceptable and they shouldn't be used to market this country's capital city. We deserve to be treated simply as what we are: Americans."

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From: Salary.com Newsletter
Sent: Tue, 25 Nov 2014 7:08:29 PM GMT
To: rgermain@mylahc.org
Subject: Pre-cations: Getting Paid Time Off Before You Start?

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TRENDS:

What Does Your Work Space Say About You? The Clutter on Your Desk Speaks Volumes About You As An Employee

Quick, look at your shoes. What do they say about you? A recent study by Dr. Omri Gillath, published in the Journal of Research in Personality, found that people's shoes revealed certain personality traits, such as agreeableness. I haven't scientifically studied people's shoes first-hand, but I believe it. Observation is a great way to find clues to people's personality styles. So if your coworkers' shoes are hiding under their desk, take a look at their workspace instead. Read the following four descriptions and see if you can identify each person's personality style.



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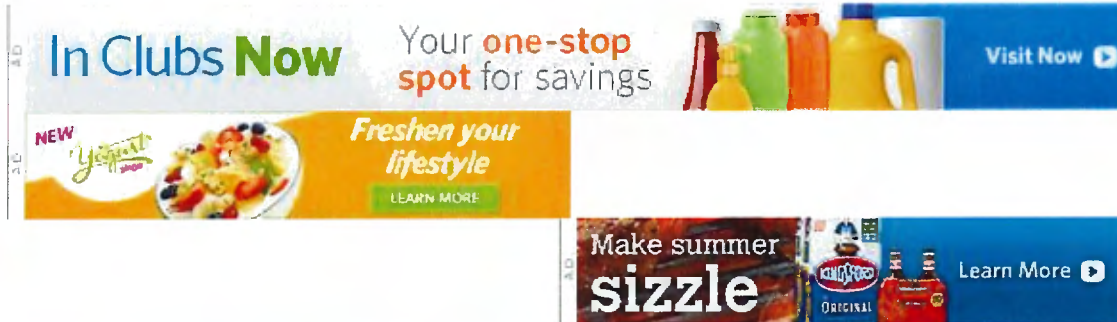


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Sent: Mon, 20 Apr 2015 2:29:21 PM GMT
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Subject: Up to 50% OFF Weekly Deals + buy your Red Nose today

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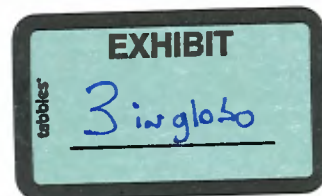
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April 22, 2015

Member Name: C [REDACTED] E [REDACTED]
Member ID: [REDACTED]
Complaint #321484

Please see the attached explanation of benefits as Ms. E [REDACTED]'s visit to the Breast Cancer Center of Acadiana. This claim was paid on 5/4/2015 according to her policy.

A'JeNenne McDonald
Member Services Supervisor
504-684-2533



LAHC_E_02977330

From: Anisa Dominick
Sent: Thu, 26 Feb 2015 5:00:43 PM GMT
To: Glynda Ferdinand
Cc: Sam Blount
Subject: FW: Member Account issue
Attachments: ATT00001.bin

Member is looking for an update on his account. This was sent on 02/12/15.

Group Name	Outstanding Amount	Payment Amount	Remaining Payment	Unapplied Amount	Payment Method
[REDACTED]	8351.00	379.00	7972.00	0.00	Credit Card
[REDACTED]	4364.90	378.80	3986.10	0.00	Credit Card

From: Anisa Dominick
Sent: Thursday, February 12, 2015 4:56 PM
To: Member Inquiry
Cc: Glynda Ferdinand; Sam Blount
Subject: Member Account issue

Member was not effective in 2014
January and February Invoices are member incorrect. Member paid Binder payment for 2015 and is not active.

LAHC_E_02584889

Search By

- Search Name
- EHP ID
- Unique ID
- Group ID
- DOB
- SSN

Search Name B [REDACTED] M

EHP ID	Member Name	SSN	Unique ID	DOB	Sex	Rel	COB	Group
[REDACTED] 02	[REDACTED], M	[REDACTED] 0625	Z01	1960	F	S	N	71001411 - LOUISIANA HEA
[REDACTED] 01	[REDACTED], M	[REDACTED] 7337	Z01	1959	M	E	N	71001411 - LOUISIANA HEA
[REDACTED] 01	[REDACTED], M	[REDACTED] 5805	Z01	1950	F	E	N	71001411 - LOUISIANA HEA
[REDACTED] 01	[REDACTED], M	[REDACTED] 6418	Z01	1951	F	E	N	71001411 - LOUISIANA HEA
[REDACTED] 01	[REDACTED], M	[REDACTED] 6206	Z01	1972	M	E	N	71001411 - LOUISIANA HEA

Coverage

Plan ID	Description	Effective	Term Date	Status	Network	PCP ID	PCP
[REDACTED]	MEDICAL - GOLD POS	1/1/2015	1/31/2015	S	LHC_PHCS		

Eligibility Info

Incidents Exist

Accumulators

Claims

Final

M [REDACTED] B [REDACTED]
PO BOX [REDACTED]
BATON ROUGE Louisiana 70831

Date: 02/10/2015

M [REDACTED] B [REDACTED]

Thank you for choosing Louisiana Health Cooperative. All premiums must be received by 03/01/2015 to ensure proper credit and continued coverage.

Please contact us at 855-475-3702 with questions concerning your premium invoice.

Benefits Accounts Summary

Previous Balance	7972.20
Payments	378.80
Current Charges	378.80
Adjustments	0.00
Total Due	8351.00

Detach and return this portion with your payment. Keep the upper portion for your records.

Please allow 3 – 5 business days for payment processing. Not including invoice stub or Member ID with your payment can result in a delay of the payment posting to your account.

Group Name: A B [REDACTED] Search					
Group Name	Outstanding Amount	Payment Amount	Remaining Payment	Unapplied Amount	Payment Method
M [REDACTED] B [REDACTED]	4364.90	378.80	3986.10	0.00	Credit Card

Thank You,

Anisa R. Dominick
Billing Accounts Receivable Coordinator Assistant

LAHC_E_02584891

Louisiana Health Cooperative, INC. (LAHC)
3445 N. Causeway Blvd., Suite 800
Metairie, LA 70002
Phone: 504.303.4506

LAHC_E_02584892
