

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

PARISH OF EAST BATON ROUGE

CGI TECHNOLOGIES AND
SOLUTIONS, INC., GROUP
RESOURCES INCORPORATED, BEAM
PARTNERS, LLC, MILLIMAN, INC.,
BUCK CONSULTANTS, LLC. WARNER
L. THOMAS, IV, WILLIAM A. OLIVER,
SCOTT POSECAI, PAT QUINLAN,
PETER NOVEMBER, MICHAEL
HULEFELD, ALLIED WORLD
SPECIALTY INSURANCE
COMPANY a/k/a DARWIN NATIONAL
ASSURANCE COMPANY,
ATLANTIC SPECIALTY INSURANCE
COMPANY, EVANSTON INSURANCE
COMPANY, RSUI INDEMNITY
COMPANY AND ZURICH AMERICAN
INSURANCE COMPANY

19TH JUDICIAL DISTRICT COURT

STATE OF LOUISIANA

**MOTION FOR LEAVE TO FILE PLAINTIFF'S
FOURTH AMENDED PETITION FOR DAMAGES AND REQUEST FOR JURY TRIAL
AND INCORPORATED MEMORANDUM IN SUPPORT**

NOW INTO COURT, through undersigned counsel, comes Plaintiff, 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 "Commissioner"), who respectfully moves this Honorable Court for leave to file the attached Fourth Amended Petition for Damages and Request for Jury Trial ("Fourth Amended Petition"), pursuant to Louisiana Code of Civil Procedure article 1151 and Local Rule 9.9(g)(4), for the reasons set forth below:

Plaintiff would like to clarify that his claims do not include claims on behalf of the Louisiana Department of Insurance as Regulator. Plaintiff therefore respectfully moves for leave of Court to file the attached, Fourth Amended Petition, which specifically amends Plaintiff's previously filed and pending Second Amended Petition for Damages and Request for Jury Trial, as amended by the Third Amended Petition for Damages and Request for Jury Trial.

The filing of this Fourth Amended Petition will not delay this case or cause any undue hardship whatsoever on the defendants. Discovery is in the initial stages. No depositions have yet

Patricia K. [Signature]



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Correct Copy
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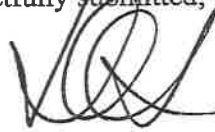
East Baton Rouge Parish
Deputy Clerk of Court

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been taken. A Case Management Schedule ("CMS") was signed by this Honorable Court on September 14, 2020, which sets an April 1, 2021, deadline to amend pleadings. No trial date has been set.

WHEREFORE, Plaintiff prays that this Motion for Leave be granted, and that his Fourth Amended Petition for Damages be filed without delay.

Respectfully submitted,



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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 4th day of November, 2020, in Baton Rouge, Louisiana.

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19TH JUDICIAL DISTRICT COURT

STATE OF LOUISIANA

ORDER

Considering Plaintiff's Motion for Leave to File Fourth Amended Petition for Damages and Request for Jury Trial (with Incorporated Memorandum):

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that the Motion for Leave is **GRANTED**, and the Plaintiff's Fourth Amended Petition for Damages and Request for Jury Trial be deemed filed.

SIGNED this November 06 2020, 2020, at Baton Rouge, Louisiana.



HON. JUDGE TIMOTHY KELLEY, 19th JDC

PLEASE PROVIDE NOTICE
PURSUANT TO LSA-CCP ART. 1913

