

**BEFORE THE COMMISSIONER OF INSURANCE
FOR THE STATE OF LOUISIANA**

**IN RE: LOUISIANA HEALTH SERVICE & INDEMNITY COOMPANY D/B/A BLUE
CROSS AND BLUE SHIELD OF LOUISIANA PLAN OF REORGANIZATION
REGARDING THE CONVERSION FROM A MUTUAL INSURANCE
COMPANY TO A STOCK INSURANCE COMPANY**

CAUSE NO.: _____

PETITION FOR INTERVENTION

NOW INTO COURT, appearing herein in proper person, comes Intervenors, JOHN S. BRADFORD and DINAH C. BRADFORD, who respectfully submit this Petition for Intervention (the "Petition") pursuant to §1115 of rule Number 1-Rules of Practice and Procedure before the Commissioner of Insurance. As more fully explained below, Petitioners' interest is directly and immediately affected by the proceedings in the above-captioned matter. Accordingly, Intervenors respectfully request leave to intervene in the above captioned matter. In support of this Petition, Intervenors aver as follows:

1.

Petitioners, John S. Bradford and Dinah C. Bradford, are members of Louisiana Health Service & Indemnity Company doing business as a mutual insurance company Blue Cross and Blue Shield of Louisiana ("BCBSLA"). John S. Bradford and Dinah C. Bradford each have had an individual policy for the last 10 years and have long been insured under a Blue Cross policy issued to Stockwell, Sievert, Viccellio, Clements & Shaddock, L.L.P. BCBSLA proposes a reorganization plan to de-mutualize BCBSLA in its entirety and deprive the members of valid consideration for the sale of the assets of BCBSLA. This plan of reorganization violates La. R.S. 22:236.4 because:

- a) It does **not** properly protect the interest of the policy holders and members;
- b) The plan of reorganization does **not** serve the best interest of the policy holders and members;
- c) The plan of reorganization is **not** fair and equitable to policy holders and members.

II.

The plan for reorganization provides that all but approximately 300 million of the assets owned by BCBSLA will be transferred to a captive foundation which will not be in the best interest of the members and policyholders of BCBSLA. This Delaware Foundation will have an interlocking board of directors named by BCBSLA and its operation will be unrelated to the members.

III.

The “fairness” opinions received by the Louisiana Department of Insurance from Chaffe & Associates and actuaries are submitted without factual or legal basis and are erroneous. A responsible plan for liquidation should be undertaken solely for the benefit of the members.

IV.

The method of voting is unfair and unreasonable to members and policyholders and all employees who have a certificate of insurance with BCBSLA.

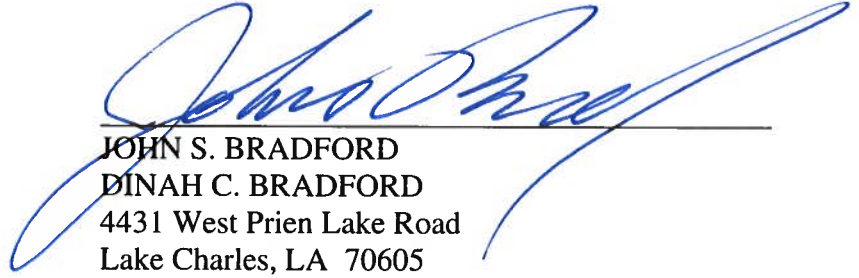
V.

Directors who have voted for the plan of reorganization may have a conflict of interest with the sale.

PRAYER FOR RELIEF

WHEREFORE, for the reasons set forth herein, Intervenors, JOHN S. BRADFORD and
DINAH C. BRADFORD, pray that this Petition for Intervention be GRANTED.

Respectfully submitted,

A large, stylized handwritten signature in blue ink, appearing to read "John S. Bradford", is written over a horizontal line. The signature is fluid and cursive, with a long, sweeping tail that extends to the right.

JOHN S. BRADFORD
DINAH C. BRADFORD
4431 West Prien Lake Road
Lake Charles, LA 70605
Telephone: 337-802-3377
jsbradford@ssvcs.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 7th day of September 2023, a copy of the above and foregoing has been sent via electronic mail to the following:

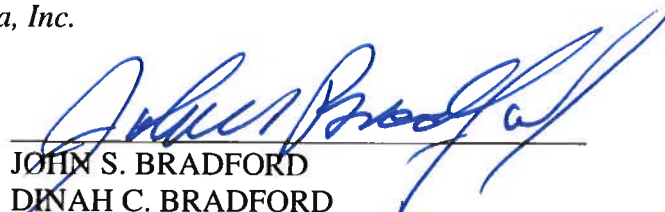
Arlene Knighten,
In care of James David Caldwell
Louisiana Department of Insurance
1702 North Third Street
Baton Rouge, LA 70802
David.caldwell@ldi.la.gov

David S. Rubin
Butler Snow LLP
445 North Boulevard, Suite 300
Baton Rouge, LA 70802
David.Rubin@butlersnow.com

Attorneys for Louisiana Department of Insurance

Ronnie L. Johnson
Rodolfo J. Aguilar, Jr.
McGlinchey Stafford, PLLC
301 Main Street, 14th Floor
Baton Rouge, LA 70801
rjohnson@mcglinchey.com
rudyaguilar@mcglinchey.com

Attorneys for Louisiana Health Service & Indemnity Company, HMO Louisiana, Inc., Southern National Life Insurance Company, Inc., Vantage Health Plan, Inc. and Community Health Plan of Louisiana, Inc.



JOHN S. BRADFORD
DINAH C. BRADFORD
4431 West Prien Lake Road
Lake Charles, LA 70605
Telephone: 337-802-3377
jsbradford@ssvcs.com

**BEFORE THE COMMISSIONER OF INSURANCE
FOR THE STATE OF LOUISIANA**

**IN RE: LOUISIANA HEALTH SERVICE & INDEMNITY COOMPANY D/B/A BLUE
CROSS AND BLUE SHIELD OF LOUISIANA PLAN OF REORGANIZATION
REGARDING THE CONVERSION FROM A MUTUAL INSURANCE
COMPANY TO A STOCK INSURANCE COMPANY**

CAUSE NO.: _____

ORDER

Considering the above and foregoing Petition for Intervention:

IT IS HEREBY ORDERED that the Petition for Intervention filed by Intervenors, JOHN
S. BRADFORD and DINAH C. BRADFORD, is GRANTED.

Baton Rouge, Louisiana this _____ day of September 2023.

ARLENE KNIGHTEN
HEARING OFFICER