

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

IN RE: LOUISIANA HEALTH SERVICE & INDEMNITY COMPANY 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. _____

AMENDED PETITION FOR INTERVENTION

NOW INTO THESE PROCEEDINGS, comes Intervenors, Henry W. Kinney, individually and as counsel for Kinney, Ellinghausen & DeShazo, Levingston Group, L.L.C., HR Solutions, Sherry Mockler, Lee Credeur, Donnie Nicosia and Robert E. Birtel, all of whom are members of Blue Cross Blue Shield of Louisiana (“BCBSLA”),

I.

Intervenors appear herein to amend the original Petition for Intervention submitted to the Louisiana Department of Insurance on September 8, 2023, for the purpose of adding the following intervenors who are all members of BCBSLA and whose interest in these proceedings align with the other Intervenors provided herein:

1. Accounting Plus Solutions, L.L.C.
425 Ashley Ridge Blvd., Suite 235
Shreveport, Louisiana 71106
2. Martha C. Foy
3. William T. Foy, Jr.
4. Travis M. Foy
5. David Giles
6. Teresa Giles

II.

It is imperative that all of the Intervenors herein be allowed intervention on the grounds that they are the only parties who are averse to BCBSLA and able to preserve their interests through undersigned counsel.

WHEREFORE, Intervenors respectfully request that they be allowed to amend their original petition and that this amendment be provided in the record of these proceedings.

RESPECTFULLY SUBMITTED:

KINNEY & ELLINGHAUSEN



HENRY W. KINNEY (#7410)

Email: hkinney@kinneylaw.com

1250 Poydras Street, Suite 2450

New Orleans, LA 70113

Telephone: 504.524.0206

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 13th 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 N. 3rd Street
Baton Rouge, LA 70802
David.caldwell@ldi.la.gov

David S. Rubin
Butler Snow L.L.P.
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
rudyaquilar@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.*

Eric P. Morvant
Jones Walker L.L.P.
445 North Boulevard, Suite 800
Baton Rouge, Louisiana 70802
emorvant@joneswalker.com

Attorney for Elevance Health, Inc. and ATH Holding Company, LLC

John S. Bradford
Stockwell, Sievert, Viccellio, Clements & Shaddock, L.L.P.
127 West Broad Street, Suite 400 (70601)
P.O. Box 2900
Lake Charles, Louisiana 70602
jsbradford@ssvcs.com

KINNEY & ELLINGHAUSEN:



HENRY W. KINNEY (#7410)