

**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. _____

AND

THE ACQUISITION OF CONTROL OF LOUISIANA HEALTH SERVICE & INDEMNITY COMPANY AND ITS SUBSIDIARIES, INCLUDING HMO LOUISIANA, INC., SOUTHERN NATIONAL LIFE INSURANCE COMPANY, INC., VANTAGE HEALTH PLAN, INC., AND COMMUNITY CARE HEALTH PLAN OF LOUISIANA, INC. BY ELEVANCE HEALTH, INC. AND ATH HOLDING COMPANY, LLC

CAUSE NO. _____

MOTION TO ENROLL ADDITIONAL COUNSEL *PRO HAC VICE*

Through the undersigned counsel come Intervenors, Elevance Health, Inc. (“Elevance Health”) and ATH Holding Company, LLC (“ATH”), who hereby move this this Honorable Hearing Officer for an order permitting Emily Z. Campbell of the law firm Faegre Drinker Biddle & Reath LLP to appear as additional counsel for Elevance Health and ATH, *pro hac vice*. Elevance Health and ATH represent the following in support of this motion:

1. Attached as “Exhibit A” is the Application for Admission *Pro Hac Vice* of Emily Z. Campbell, Faegre Drinker Biddle & Reath LLP, 300 North Meridian Street, Suite 2500, Indianapolis, Indiana. Emily Z. Campbell was admitted to the bar of the State of Indiana on October 17, 2008.

2. In her application, Emily Z. Campbell affirms that she is in good standing before the bar of Indiana, has not been convicted of any crime, that there are no disciplinary proceedings or actions or criminal charges instituted or pending against her in any state, that she has never been

denied admission *pro hac vice*, has never had any admission revoked or otherwise been disciplined or formally sanctioned by any court or lawyer disciplinary committee in Louisiana or in any other state or federal court or jurisdiction, and has never been formally held in contempt of court or otherwise sanctioned by any court.

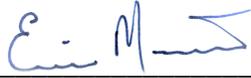
3. The requisite application fee for Emily Z. Campbell has been paid to the Louisiana Attorney Disciplinary Board and the Louisiana Attorney Disciplinary Board has approved Emily Z. Campbell's application, as evidenced by the copy of the correspondence attached to this motion as "Exhibit B."

4. The hearing on the Plan of Reorganization in this matter is set for August 21 and August 22, 2023. The hearing on the change of control has not yet been scheduled.

5. Elevance Health and ATH have submitted a proposed order in connection with this motion, the language of which admits Emily Z. Campbell to appear before this Honorable Hearing Officer *pro hac vice*.

WHEREFORE, for the foregoing reasons, Elevance Health and ATH move this Honorable Hearing Officer to enter an order admitting Emily Z. Campbell as additional counsel, *pro hac vice*.

[Signatures on Following Page.]



Eric P. Morvant (#39996)

Jones Walker LLP

445 North Boulevard, Suite 800

Baton Rouge, LA 70802

Telephone: (225) 248-2098

Fax: (225) 248-3398

emorvant@joneswalker.com

Robert B. House (admission for *pro hac vice*
pending)

Mississippi Bar No. 2689

Jones Walker, LLP

190 E. Capitol Street, Suite 800

Jackson, MS 39201

Telephone: (601) 949-4830

Fax: (601) 949-4804

rhouse@joneswalker.com

Jared R. Danilson (admission for *pro hac vice*
pending)

Emily Z. Campbell (admission for *pro hac vice*
pending)

Faegre Drinker Biddle & Reath LLP

300 North Meridian Street, Suite 2500

Indianapolis, Indiana 46204

Telephone: (317) 237-0300

Fax: (317) 237-1000

jared.danilson@faegredrinker.com

emily.campbell@faegredrinker.com

***Counsel to Elevance Health, Inc. and ATH
Holding Company, LLC***

Certificate of Service

I hereby certify that a copy of the above and foregoing has been sent via electronic mail

to the following:

James David Caldwell
Claire Lemoine
Louisiana Department of Insurance
1702 N. 3rd Street
Baton Rouge, LA
David.Caldwell@ldi.la.gov
Clarie.Lemoine@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 Care Health Plan of Louisiana, Inc.

This the 31st day of July, 2023.



Eric P. Morvant

**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. _____

AND

THE ACQUISITION OF CONTROL OF LOUISIANA HEALTH SERVICE & INDEMNITY COMPANY AND ITS SUBSIDIARIES, INCLUDING HMO LOUISIANA, INC., SOUTHERN NATIONAL LIFE INSURANCE COMPANY, INC., VANTAGE HEALTH PLAN, INC., AND COMMUNITY CARE HEALTH PLAN OF LOUISIANA, INC. BY ELEVANCE HEALTH, INC. AND ATH HOLDING COMPANY, LLC

CAUSE NO. _____

ORDER

Considering the above and foregoing *Motion to Enroll Additional Counsel Pro Hac Vice*:

IT IS HEREBY ORDERED that the *Motion to Enroll Additional Counsel Pro Hac Vice* filed by Intervenors, Elevance Health, Inc. (“Elevance Health”) and ATH Holding Company, LLC (“ATH”) is GRANTED, and Emily Z. Campbell is admitted to appear before this Honorable Hearing Officer *pro hac vice*.

Baton Rouge, Louisiana this _____ day of _____, 2023.

Arlene Knighten, Hearing Officer

APPLICATION FOR *PRO HAC VICE* ADMISSION IN LOUISIANA¹

1. Full name of Applicant: Emily Zoch Campbell
2. Full name, address and telephone number of law firm in which the applicant practices:
Faegre Drinker Biddle & Reath LLP, 300 North Meridian Street, Suite 2500, Indianapolis, Indiana 46204
Telephone: (317) 237-8213
3. Applicant's residence address and telephone number:
5774 Washington Boulevard, Indianapolis, Indiana 46220
Telephone: (317) 237-8213
4. Name of case in which admission is sought: 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; Acquisition of Control of Blue Cross and Blue Shield of Louisiana
5. Court or agency and docket number of case: _____
Louisiana Department of Insurance
6. Name, address and phone number of each client sought be to represented:
- | | |
|---------------------------------|----------------------------------|
| <u>Elevance Health, Inc.</u> | <u>Telephone: (317) 488-6604</u> |
| <u>220 Virginia Avenue</u> | _____ |
| <u>Indianapolis, IN 46204</u> | _____ |
| <u>ATH Holding Company, LLC</u> | <u>Telephone: (317) 488-6604</u> |
| <u>220 Virginia Avenue</u> | _____ |
| <u>Indianapolis, IN 46204</u> | _____ |

EXHIBIT
A

¹ If the spaces are not sufficient to allow for complete responses, please append any additional responses to this Application.

7. Please list every court before which you have been admitted to practice (excluding *pro hac vice* admissions), the respective period(s) of admission and your bar roll or other identifying number before the courts:

State of Indiana

Admitted on October 17, 2008

Bar No. 28147-02A

8. Please check the appropriate box indicating whether you:

(a) have been denied admission *pro hac vice* in this state

yes no

(b) had admission *pro hac vice* revoked in this state

yes no

(c) have otherwise formally been disciplined or sanctioned by any court in this state

yes no

If you answered affirmatively to these questions, please specify:

The nature of the allegations: _____

The name of the authority bringing such proceedings: _____

The caption of the proceedings: _____

The date filed: _____

What findings were made: _____

What action was taken in connection with those proceedings: _____

9. Have you ever been publicly disciplined by any lawyer disciplinary committee, state or federal court, or lawyer disciplinary agency in any other jurisdiction?
 yes no

If you answered affirmatively, as to each such discipline, please provide the following:

A summary of the allegations against you: _____

The name of the state or federal authority bringing such proceedings: _____

The date the discipline was imposed: _____

The style of the proceedings: _____

The findings made and discipline imposed in connection with the proceedings: _____

(A copy of any public Order of lawyer discipline imposed against the applicant shall be appended to this Application)

10. Please state whether you have been held formally in contempt or otherwise sanctioned by any court in a written order in the last five (5) years.
 yes no

If you answered affirmatively, as to each occurrence, please provide the following:

The nature of the allegations: _____

The name of the court before which such proceedings were conducted: _____

The date of the contempt order or sanction: _____

The caption of the proceedings: _____

The substance of the court's rulings (a copy of the written order or transcript of the oral rulings shall be attached to this Application): _____

11. Please state whether you have been convicted of any crimes (other than minor, non-alcohol related traffic violations).
- yes no

If you answered affirmatively, as to each occasion, please provide the following:

The substance of the criminal charge(s) _____

The name of the court before which the proceeding was conducted: _____

The approximate date the proceeding was concluded: _____

The outcome of the proceeding: _____

(A copy of any such Judgment or Order of Conviction shall be appended to this Application.)

12. Are there any criminal charges (other than minor, non-alcohol related traffic violations) or lawyer disciplinary complaints or proceedings presently pending against you?
- yes no

If you answered affirmatively, as to each such pending criminal charge or lawyer disciplinary complaint or proceeding, please provide the following:

The name and address of the court or agency before which the criminal proceeding or lawyer disciplinary complaint or proceeding is pending: _____

The substance and nature of any criminal charge or lawyer disciplinary complaint or proceeding pending against you: _____

(A copy of any pending lawyer discipline complaint(s) or proceeding(s), or criminal charge(s), shall be appended to this Application.)

13. Please state the name and address of each court or agency and a full identification of each

proceeding in which the applicant has moved a Louisiana Court or agency, and/or filed an application to appear *pro hac vice*, or appeared *pro hac vice*, in this state within the preceding two years; the date of each application; and the outcome of the application.

None	
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

14. Please list the name, address, telephone number and bar number of an active member in good standing of the bar of this state who will sponsor your *pro hac vice* request. The bar member preferably will be the attorney of record for the client(s) you seek to represent.

Eric P. Morvant	39996
_____	_____
Name	Bar number
445 North Boulevard, Suite 800	

Address	
Baton Rouge, LA 70802	(225) 248-2098
_____	_____
	Telephone number

15. Please list your prior or continuing representation in other matters of one or more of the clients you propose to represent and any relationship between such other matter(s) and the proceeding for which you seek admission.

Insurance regulatory and corporate matters; Insurance regulatory matters regarding the acquisitions of Vantage Health Plan of Arkansas, Inc. and Vantage Health Plan of Mississippi, Inc., Blue Cross and Blue Shield of Louisiana subsidiaries domiciled in Arkansas and Mississippi, respectively.

16. Please list any special experience, expertise, or other factor deemed to make it particularly desirable that you be permitted to represent the client(s) you propose to represent.

Insurance regulatory expertise

17. Please attach to this application a current (issued within 90 days) certificate of good standing from every state you are presently licensed to practice in.

VERIFICATION

Our signatures serve as verification that (1) the information contained in this application is true and correct, to the best of our information and belief; (2) the application fee required by Louisiana’s *pro hac vice* admission rule been remitted to the Louisiana Attorney Disciplinary Board (unless an exemption is applicable); (3) the out-of-state attorney is “temporarily present in this state” pursuant to R.S. 37:214; (4) in the event this application is approved, all documents requiring the signature of counsel for a party may not be signed solely by the out-of-state attorney, but also must bear the signature of the Louisiana associated counsel; (5) this application has been or will be served upon all parties and upon the Louisiana Attorney Disciplinary Board; and (6) we are familiar with the Louisiana Rules of Professional Conduct, the rules of discipline of the Louisiana Attorney Disciplinary Board, and the local rules and court procedures of the court or agency before which the applicant is seeking to practice.

300 North Meridian Street, Suite 2500

Indianapolis, Indiana 46204

(317) 237-8213

Business Address and Phone Number
of Applicant

445 North Boulevard, Suite 800

Baton Rouge, LA 70802

(225) 241-2098; Bar No. 39996

Business Address, Phone Number,
and Bar Roll Number of
Louisiana Associated Attorney

Emily Zoch Campbell

Full Name of Applicant



Signature of Applicant

Eric Phillip Morvant

Full Name of Louisiana
Associated Attorney



Signature of Louisiana
Associated Attorney



LOUISIANA ATTORNEY DISCIPLINARY BOARD

OFFICE OF THE DISCIPLINARY COUNSEL

4000 S. Sherwood Forest Blvd.

Suite 607

Baton Rouge, Louisiana 70816

(225) 293-3900 • 1-800-326-8022 • FAX (225) 293-3300

July 26, 2023

Emily Zoch Campbell, Esq.
Faegre Drinker Biddle & Reath LLP
300 North Meridian St Ste 2500
Indianapolis IN 46204

Re: 23-PHV-0372

Louisiana Health Service & Indemnity Company dba Blue Cross and Blue Shield of Louisiana Plan of Reorganization Regarding the Conversion from a Mutual Insurance Company to a Stock Insurance Company; Acquisition of Control of Blue Cross and Blue Shield of Louisiana
Department of Insurance, Parish of East Baton Rouge, State of Louisiana

Dear Ms. Campbell,

The Louisiana Office of Disciplinary Counsel has received your application for *pro hac vice* admission in the State of Louisiana in connection with the *Louisiana Health Service & Indemnity Company dba Blue Cross and Blue Shield of Louisiana Plan of Reorganization Regarding the Conversion from a Mutual Insurance Company to a Stock Insurance Company; Acquisition of Control of Blue Cross and Blue Shield of Louisiana* matter in East Baton Rouge Parish. A review of your application indicates that you are supported by your sponsoring attorney Eric P Movant., who is currently licensed and in good standing with the Louisiana State Bar. In all respects, it appears that your application is in appropriate format. The Office of Disciplinary Counsel currently possesses no information upon which to base an opposition to your application.

By copy of this correspondence to the presiding board and your sponsoring attorney, we are advising them of our approval of your application.

EXHIBIT
B



LOUISIANA ATTORNEY DISCIPLINARY BOARD

OFFICE OF THE DISCIPLINARY COUNSEL

4000 S. Sherwood Forest Blvd.

Suite 607

Baton Rouge, Louisiana 70816

(225) 293-3900 • 1-800-326-8022 • FAX (225) 293-3300

Sincerely,

A handwritten signature in black ink, which appears to read "Charles B. Plattsmier". The signature is fluid and cursive.

Charles B. Plattsmier
Chief Disciplinary Counsel

/lbc

cc: LA Dept of Insurance
Eric P Movant, Esq.