

**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. _____

MOTION FOR LEAVE TO FILE PETITION FOR INTERVENTION

Through the undersigned counsel, come Intervenors, Elevance Health, Inc. (“Elevance Health”) and ATH Holding Company, LLC (“ATH”) who respectfully move this Honorable Hearing Officer for leave to file the 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 in the Petition, Elevance Health’s and ATH’s interests are directly and immediately affected by the proceeding in the above-captioned matter. Accordingly, Elevance Health and ATH respectfully request leave to intervene in the above-captioned matter.

WHEREFORE, for the reasons more fully set forth in the Petition for Intervention, Elevance Health’s and ATH’s Motion for Leave to File Petition for Intervention should be GRANTED. Accordingly, Elevance Health and ATH should be granted leave to intervene in accordance with §1115 of Rule Number 1 – Rules of Practice and Procedure before the Commissioner of Insurance.

[Signatures on Following Page.]



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Certificate of Service

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

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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 24th 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. _____

ORDER

Considering the above and foregoing *Motion for Leave to File Petition for Intervention*:

IT IS HEREBY ORDERED that the *Motion for Leave to File Petition for Intervention* filed by Intervenors, Elevance Health, Inc. (“Elevance Health”) and ATH Holding Company, LLC (“ATH”) is GRANTED, and Elevance Health and ATH are granted leave to file the Petition for Intervention in the above-captioned matter.

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

Arlene Knighten, Hearing Officer

**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. _____

PETITION FOR INTERVENTION

NOW INTO COURT, through the undersigned counsel, come Intervenors, Elevance Health, Inc. (“Elevance Health”) and ATH Holding Company, LLC (“ATH”) 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, Elevance Health’s and ATH’s interests are directly and immediately affected by the proceeding in the above-captioned matter. Accordingly, Elevance Health and ATH respectfully request leave to intervene in the above-captioned matter. In support of this Petition, Elevance Health and ATH aver as follows:

Elevance Health’s and ATH’s Interests are Directly Affected

1.

The subject of this proceeding is the proposed reorganization of Louisiana Health Service & Indemnity Company (d/b/a Blue Cross and Blue Shield of Louisiana) (“BCBSLA”) from a mutual insurance company to a stock insurance company. Pursuant to the Plan of Reorganization filed by BCBSLA, the stock of BCBSLA that is to be issued would be issued directly to ATH, a subsidiary of Elevance Health, thus, BCBSLA would become an indirect wholly owned subsidiary of Elevance Health as a result of the reorganization.

2.

Because the issuance of the stock of BCBSLA to ATH would result in a change of control of BCBSLA and its subsidiaries, ATH and Elevance Health filed Applications for a Change of Control, including a Form A Statement regarding the acquisition of control of BCBSLA and its subsidiaries in accordance with La. R.S. § 22:691.4.

3.

No stock can be issued by BCBSLA without the approval of the Plan of Reorganization. Furthermore, the Plan of Reorganization includes the issuance of such stock to ATH and thus the Plan of Reorganization cannot be approved without the approval of the change of control of BCBSLA and its subsidiaries.

4.

The Plan of Reorganization and the change of control of BCBSLA and its subsidiaries are inextricably intertwined, and one cannot happen without the other. In other words, but for the reorganization, there would be no change of control, and without the reorganization, there can be no change of control.

5.

The approval by the Commissioner of Insurance includes, by necessity, both the reorganization of BCBSLA and the change of control of BCBSLA and its subsidiaries. The subject matter and any issues regarding the reorganization of BCBSLA and the change of control of BCBSLA and its subsidiaries that may arise as a result thereof are one and the same.

6.

In any event, the Louisiana Department of Insurance has thus far determined to review the Plan of Reorganization in one proceeding—this proceeding—and the change of control of BCBSLA and its subsidiaries in a separate proceeding.

7.

As a result, the interests of Elevance Health and ATH are to be directly and immediately affected by this proceeding.

Prayer for Relief

WHEREFORE, for the reasons set forth herein, Elevance Health's and ATH's Petition for Intervention should be GRANTED. Accordingly, Elevance Health and ATH should be granted leave to intervene in accordance with §1115 of Rule Number 1 – Rules of Practice and Procedure before the Commissioner of Insurance.



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This the 24th day of July, 2023.


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ORDER

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IT IS HEREBY ORDERED that the *Petition for Intervention* filed by Intervenors, Elevance Health, Inc. (“Elevance Health”) and ATH Holding Company, LLC (“ATH”) is GRANTED, and Elevance Health and ATH are granted leave to intervene in the above-captioned matter.

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

Arlene Knighten, Hearing Officer