

STATE OF NORTH CAROLINA
DURHAM COUNTY

IN THE OFFICE OF
ADMINISTRATIVE HEARINGS
23 INS 738

BLUE CROSS AND BLUE)
SHIELD OF NORTH CAROLINA,)

Petitioner,)

v.)

NORTH CAROLINA STATE)
HEALTH PLAN FOR)
TEACHERS AND STATE)
EMPLOYEES)

Respondent)

and)

AETNA LIFE INSURANCE)
COMPANY)

Respondent-Intervenor.)

JOINT STATEMENT OF
PROPOSED DATES FOR
CONTESTED-CASE HEARING

Pursuant to this Tribunal’s March 15, 2023 request, counsel for the parties have met and conferred on proposed hearing dates for this contested case. The parties jointly propose that this case be set for hearing the week of February 12, 2024 and, to the extent necessary, the week of February 19, 2024.

The parties have also conferred on a schedule for key dates going forward and respectfully propose the following:

1. The parties shall submit a proposed stipulated protective order (or, in the absence of agreement, a proposed order that notes areas of disagreement) for this

Tribunal's review within fourteen calendar days after entry of a scheduling order by the Tribunal.

2. The parties shall promptly meet and confer in good faith on the production of documents in response to any Request for Production of Documents, including the use of search terms and other parameters. Productions shall be made on a rolling basis and shall be substantially completed on or before May 26, 2023.

3. Privilege logs for any documents withheld from production shall be provided on or before June 9, 2023.

4. Fact discovery shall be completed on or before September 1, 2023.

5. Petitioner shall make expert disclosures on or before September 8, 2023. Respondent and Respondent-Intervenor shall make any expert disclosures on or before October 6, 2023. Rebuttal reports shall be served on or before October 20, 2023. All expert disclosures shall include reports with all information required by Rule 26(b)(4)(a)(1) and (2) of the North Carolina Rules of Civil Procedure.

6. Expert depositions shall be completed on or before November 3, 2023.

7. Any dispositive motions and briefs in support shall be filed on or before November 20, 2023. Briefs in opposition to any dispositive motion shall be filed on or before December 20, 2023.

8. If this Tribunal wishes to hold a hearing on any dispositive motions, the parties propose that the hearing be scheduled during the week of January 8, 2024.

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Respectfully submitted, this 24th day of March, 2023.

ROBINSON, BRADSHAW & HINSON, P.A. FOX ROTHSCHILD LLP

/s/ Nathan C. Chase, Jr.
Matthew W. Sawchak
N.C. State Bar No. 17059
msawchak@robinsonbradshaw.com

Stephen D. Feldman
N.C. State Bar No. 34940
sfeldman@robinsonbradshaw.com

434 Fayetteville Street, Suite 1600
Raleigh, North Carolina 27601
Telephone: (919) 239-2600
Facsimile: (919) 328-8790

Nathan C. Chase, Jr.
N.C. State Bar No. 39314
nchase@robinsonbradshaw.com

101 N. Tryon Street, Suite 1900
Charlotte, North Carolina 28246
Telephone: (704) 377-2536
Facsimile: (704) 378-4000

*Counsel for Petitioner Blue Cross and
Blue Shield of North Carolina*

/s/ Marcus C. Hewitt
Robert H. Edmunds, Jr.
N.C. State Bar No. 6602
bedmunds@foxrothschild.com

230 N. Elm Street, Suite 1200
Greensboro, NC 27401
Telephone: (336) 378-5446
Facsimile: (336) 378-5400

Marcus C. Hewitt
mhewitt@foxrothschild.com
N.C. State Bar No. 23170

Elizabeth Sims Hedrick
N.C. State Bar No. 38513
ehedrick@foxrothschild.com

434 Fayetteville Street, Suite 2800
Raleigh, NC 27601
Telephone: (919) 755-8700
Facsimile: (919) 755-8800

*Counsel for Respondent North Carolina
State Health Plan for Teachers and
State Employees*

WYRICK ROBBINS YATES &
PONTON LLP

/s/ Lee M. Whitman
Lee M. Whitman
N.C. State Bar No. 20193
lwhitman@wyrick.com

Benjamin N. Thompson
N.C. State Bar No. 9005

bthompson@wyrick.com

Sophia V. Blair
N.C. State Bar No. 53753
sblair@wyrick.com

4101 Lake Boone Trail, Suite 300
Raleigh, North Carolina 27607
(919) 781-4000

*Counsel for Respondent-Intervenor
Aetna Life Insurance Company*