

EXHIBIT I

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.)

BLUE CROSS NC'S RESPONSES
AND OBJECTIONS TO AETNA'S
FIRST SET OF INTERROGATORIES
AND REQUESTS FOR
PRODUCTION OF DOCUMENTS

Pursuant to 26 N.C. Admin. Code 03.0112 and N.C. Gen. Stat. § 1A-1, Rules 26, 33, and 34, Blue Cross NC serves the following responses to Aetna's first sets of interrogatories and requests for production (together, "the requests").

Blue Cross NC's responses and objections to the requests are based on the information presently known to Blue Cross NC and are given without prejudice to Blue Cross NC's right to adduce evidence discovered or analyzed after the date of these responses and objections. Blue Cross NC expressly reserves the right to revise, supplement, or otherwise amend these responses and objections to the extent permitted by the North Carolina Rules of Civil Procedure or the North Carolina

Administrative Code. Blue Cross NC will produce only those documents that can be located through a reasonable inquiry and diligent search as defined by these responses and ongoing meet-and-confer efforts. Blue Cross NC will produce documents within the time permitted by the Scheduling Order in this case.

Blue Cross NC does not intend, and these responses and objections should not be construed as, an agreement with any characterization of fact or conclusion of law contained in or implied by any request. In responding and objecting to the requests, Blue Cross NC neither admits nor denies any disputed facts or legal conclusions. Blue Cross NC expressly reserves the right to object to the admissibility and admission into evidence of any of these responses.

OBJECTIONS TO INSTRUCTIONS AND DEFINITIONS

1. Blue Cross NC objects to Instruction Nos. 1, 2, and 3 and Definition No. 1 as overly broad, unduly burdensome, and to the extent that they require Blue Cross NC to search for documents that are outside of Blue Cross NC's possession, custody, or control or to produce documents that are protected from disclosure by the attorney-client privilege, work-product doctrine, or any other applicable privilege. Blue Cross NC will not search for documents that are not in its NC's possession, custody, or control. Blue Cross NC will not search for documents in the possession of, or respond on behalf of, its "its affiliates, successors, officers, directors, members, managers, past and present employees, consultants, advisers, agents, attorneys, representatives, experts, and any other person acting on [Blue Cross NC's] behalf." Blue Cross NC will not contact each and every one of its past

and present employees, consultants, advisers, agents, representatives, experts, or other persons acting on Blue Cross NC's behalf to verify whether they might have information in their possession, custody, or control. Blue Cross NC will not respond on behalf of its outside attorneys, because such a response would yield information and documents that are protected from disclosure by the attorney-client privilege and/or the work-product doctrine. Blue Cross NC will conduct reasonable inquiries for relevant, non-privileged information responsive to these requests that is in its possession, custody, and control, and where applicable, within the possession and control of employees whom it believes are likely to have relevant, responsive information that is within its control.

2. Blue Cross NC objects to Definition No. 7 as overly broad and unduly burdensome to the extent that it seeks to include information from sources that are not reasonably accessible because of undue burden and cost. Blue Cross NC further objects to Definition No. 7 to the extent that it requires Blue Cross NC to search for documents outside of Blue Cross NC's possession, custody, or control

3. Blue Cross NC objects to Definition No. 12 as overly broad and unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Blue Cross NC also objects to Definition No. 12 as vague, ambiguous, and unintelligible because it defines "relating to" and "pertaining to" as meaning "opposite to."

4. Blue Cross NC objects to Definition No. 13 as overly broad and unduly burdensome, and not reasonably calculated to lead to the discovery of admissible

evidence, and not required by the North Carolina Rules of Civil Procedure or the North Carolina Administrative Code. Blue Cross NC's answers will not provide the details requested by Definition No. 13.

5. Blue Cross NC objects to the instructions and definitions to the extent that they are inconsistent with, or purport to impose obligations that are greater than, or more burdensome than, those mandated by the North Carolina Administrative Code, North Carolina Rules of Civil Procedure, the April 26, 2023 Protective Order, or other applicable law.

6. Blue Cross NC objects to the instructions and definitions insofar as they request information stored on backup and/or disaster-recovery systems for which retrieval is not reasonably accessible, would be unduly burdensome to produce, and would warrant shifting of costs.

INTERROGATORIES

1. State the name and title of all Persons with whom you consulted, upon whom you relied, or who otherwise constituted a source of information for you in connection with the preparation of your answers to Aetna's Discovery Requests, and identify the Discovery Requests for which each Person provided information or documents.

RESPONSE: Blue Cross NC incorporates by reference its objections to the instructions and definitions as if fully stated herein. Blue Cross NC also objects to this interrogatory because the phrase "upon whom you relied" is vague and ambiguous. Blue Cross NC further objects to this interrogatory because it seeks information protected by the attorney-client privilege and/or the work-product doctrine. Subject to its objections and without waiving the same, Blue Cross NC

states that Roy Watson, Vice President, State Health Plan Segment, and Aimee Forehand, Associate Vice President, State Health Plan Segment, provided information in connection with the preparation of Blue Cross NC's responses to the requests.

2. Identify all Persons who drafted, approved, were consulted, or otherwise substantively aided in the preparation of Blue Cross NC's response to the 2022 RFP. For each Person, please include their name, title, and the nature and extent of their involvement.

RESPONSE: Blue Cross NC incorporates by reference its objections to the instructions and definitions as if fully stated herein. Blue Cross NC further objects to this interrogatory as overbroad and unduly burdensome, and because it seeks information that is not reasonably calculated to lead to the discovery of admissible evidence. A large number of Blue Cross NC personnel provided some degree of assistance or input in connection with Blue Cross NC's response to the 2022 RFP. In addition, requiring Blue Cross NC to describe the precise nature and extent of each person's involvement would be unduly burdensome for an interrogatory answer. Blue Cross NC further objects to this interrogatory because it seeks information protected by the attorney-client privilege and/or the work product doctrine.

Subject to its objections and without waiving the same, Blue Cross NC provides the following answer:

- Members of Blue Cross NC's executive leadership team reviewed, discussed, and approved Blue Cross NC's response to the 2022 RFP.

The participation of each member of the executive leadership team

varied based on the member. At the time Blue Cross NC submitted its response to the 2022 RFP, Blue Cross NC's executive leadership team included the following individuals:

- Kelly, Calabria, Senior Vice President, Chief Marketing and Corporate Social Responsibility Officer
 - Santiago Estrada, Senior Vice President, Chief Legal Officer
 - Stephen Friedhoff, Senior Vice President, Health Care Services
 - Francesca D. Gary, Senior Vice President, Government Markets
 - Sonny Goyal, Senior Vice President, Diversified Business Group and Chief Strategy Officer
 - Karla Mizelle, Senior Vice President, Chief Operations & Member Experience Officer
 - Fara Palumbo, Senior Vice President, Chief People Officer
 - Mitch Perry, Chief Financial Officer
 - Gerald Petkau, Senior Vice President, Commercial Markets
 - Tunde Sotunde, President and Chief Executive Officer
- The following members of Blue Cross NC's State Health Plan Segment Team managed the process of drafting and submitting the RFP response:
 - Aimee Forehand, Associate Vice President, State Health Plan Segment
 - Roy Watson, Vice President, State Health Plan Segment

- The following members of Blue Cross NC’s actuarial, data-analytics, and commercial-market teams performed analysis related to Blue Cross NC’s cost proposal:
 - Rejean Boivin, Vice President, Chief Actuary
 - John Compton, Principal, Data Analysis
 - Dorinda Harrington, Manager, Analytics
 - Clarence Hartman, Director, Commercial Markets CFO
 - Richard Montero-Michaels, Senior Manager, Actuarial Services
 - Danica Turner, Associate Vice President, Head of Actuarial and Pricing Services

- Managers of certain of Blue Cross NC’s business areas reviewed portions of Blue Cross NC’s response to the RFP that relate to their respective business areas. These managers include the following:
 - Priscilla Alfaro, Vice President, Payment Integrity
 - Bruce Allen, Vice President of Sales, Government Markets
 - Natosha Anderson, Associate Vice President, Population Health and Commercial Care Management
 - Paula Banning, Vice President, Membership Operations
 - Tracy Bennett, Vice President, Audit
 - Emily Brannen, Vice President, Digital Strategy and Member Experience
 - John Campbell, Associate Vice President Healthcare, Senior Medical Director
 - Dianne DeGroff, Vice President, Corporate Services, Chief Financial Officer

- Amber Dyer, Vice President, Commercial and Medicare Compliance and Chief Compliance Officer
- Angela Evans, Manager of Claims
- Trevor Johnson, Vice President, IT Solution Delivery
- Heidi Jurgens, Vice President, Strategy, Planning, Performance
- Arif Khan, Vice President, Pharmacy Services
- Eric Koehler, Associate Vice President, Product Management, Operations and Vendor Services
- Adonna McFall, Director, Appeals and Grievances
- Sandi B. Murray, Director, State Health Plan Operations
- Lauren O'Brien, Vice President, Chief Accounting & Risk Officer
- Bonnie Phillips, Vice President, Analytics
- Aisha Ponds, Associate Vice President, Customer Service
- Ashlee Smart, Vice President, Commercial Markets Operations and Product Management
- John Smith, Associate Vice President, Senior Medical Director
- Christopher Spell, Vice President, Claims
- Mark Werner, Vice President, Provider Network & Transformation
- Members of Blue Cross NC's legal team participated in the preparation of the RFP response.

3. Identify each vendor, contractor, or consultant that assisted with Blue Cross NC's response to the 2022 RFP, and for each, describe the nature and extent of the assistance or work.

RESPONSE: Blue Cross NC incorporates by reference its objections to the instructions and definitions as if fully stated herein. Subject to its objections and without waiving the same, Blue Cross NC states that the following vendors assisted with Blue Cross NC's response to the 2022 RFP:

- MetreWorks provided project-management, editing, and graphic-design services.
- Anthem provided assistance related to claims projections.
- Labcorp provided pricing for certain services that would have been offered as a part of wellness screenings.

4. Identify each person who was involved in assessing Blue Cross NC's ability to confirm the following technical requirements in the 2022 RFP: 5.2.3.2(b)(iii), 5.2.6.2(b)(xvi), 5.2.7.2(b)(xxiv)(1)–(4), and 5.2.8.2(b)(v). For each person you identify in your response, provide the particular technical requirements for which that person assessed Blue Cross NC's ability to confirm.

RESPONSE: Blue Cross NC incorporates by reference its objections to the instructions and definitions as if fully stated herein. Blue Cross NC further objects to this interrogatory as overly broad, unduly burdensome, and not reasonably calculated to the discovery of admissible evidence to the extent that it seeks the identity of individuals whose involvement does not bear on the issues in this case. Blue Cross NC also objects to this interrogatory because it calls for the disclosure of attorney-client privileged communications. Subject to its objections and without waiving the same, Blue Cross NC states as follows:

- Certain members of the Blue Cross NC’s executive-leadership team (identified above), including Mr. Friedhoff, Mr. Petkau, and Dr. Sotunde, provided input and review on Blue Cross NC’s responses to these technical requirements.
- The Blue Cross NC legal team provided privileged advice in connection with the RFP response.
- The following individuals also were involved in assessing certain of these requirements:
 - Natosha Anderson
Associate Vice President, Population Health and Commercial Care Management
Requirement(s): 5.2.7.2(b)(xxiv)
 - Emily Brannen
Vice President, Digital Strategy
Requirement(s): 5.2.7.2(b)(xxiv)
 - Ginny Brosnan
Director of Clinical Teams
Requirement(s): 5.2.3.2(b)(iii)
 - John Campbell
Associate Vice President, Senior Medical Director
Requirement(s): 5.2.3.2(b)(iii)
 - Aimee Forehand
Associate Vice President, State Health Plan Segment
Requirement(s): 5.2.3.2(b)(iii), 5.2.6.2(b)(xvi), 5.2.7.2(b)(xxiv)
 - Trevor Johnson
Vice President, IT Solution Delivery
Requirement(s): 5.2.7.2(b)(xxiv)
 - Debra Liverman
Manager, Member Digital Strategy
Requirement(s): 5.2.7.2(b)(xxiv)

- Sandi B. Murray
Director, State Health Plan Operations
Requirement(s): 5.2.6.2(b)(xvi)
- Troy Page
Associate Vice President, Provider Network and Reimbursement
Requirement(s): 5.2.3.2(b)(iii), 5.2.8.2(b)(v)
- Paul Reeves
Technical Consultant
Requirement(s): 5.2.6.2(b)(xvi)
- Bryan Rigsbee
Principal Project Manager, State Segment
Requirement(s): 5.2.6.2(b)(xvi)
- Christel Sanders
Director, Healthcare Operations Solutions
Requirement(s): 5.2.7.2(b)(xxiv)
- Christopher Spell
Vice President, Claims
Requirement(s): 5.2.6.2(b)(xvi), 5.2.7.2(b)(xxiv)
- Lynette Tunstall
Manager, Business Systems
Requirement(s): 5.2.6.2(b)(xvi)
- Roy Watson
Vice President, State Health Plan Segment
Requirement(s): 5.2.3.2(b)(iii), 5.2.6.2(b)(xvi), 5.2.7.2(b)(xxiv),
5.2.8.2(b)(v)
- Mark Werner
Vice President, Provider Network & Transformation
Requirement(s): 5.2.3.2(b)(iii), 5.2.8.2(b)(v)

5. State whether the Plan communicated with Blue Cross NC regarding the Plan's decision to issue the 2022 RFP, and, if so, describe in detail the persons involved and the substance of the communications.

RESPONSE: Blue Cross NC incorporates by reference its objections to the instructions and definitions as if fully stated herein. Subject to its objections and without waiving the same, Blue Cross NC states that the Plan did not seek Blue Cross NC's input or otherwise discuss with Blue Cross NC the Plan's decision to issue the 2022 RFP, and that the management of Blue Cross NC learned of this decision when Plan representatives asked Blue Cross NC representatives to attend a meeting on June 15, 2022 about the 2022 RFP.

6. State whether the Plan communicated with Blue Cross NC regarding the 2022 RFP prior to the issuance of that RFP, including but not limited to the RFP's technical requirements, network requirements, or pricing guarantees, and if so, describe in detail the persons involved and the substance of the communications.

RESPONSE: Blue Cross NC incorporates by reference its objections to the instructions and definitions as if fully stated herein. Subject to its objections and without waiving the same, Blue Cross NC states that Ms. Forehand and Mr. Watson attended a meeting on June 15, 2022 with Dee Jones and Kendall Bourdon at the Plan's request.

At the meeting, the Plan's representatives told Ms. Forehand and Mr. Watson that the 2022 RFP process and materials would differ from past RFPs, and that the changes would reflect an effort by the Plan to "modernize" the RFP process and reduce the administrative burden on the Plan's staff. The Plan's representatives then provided a short, high-level overview of these changes. The Plan did not provide Blue Cross NC with any written materials. Pursuant to

Rule 33(c), Blue Cross NC directs the Plan to Ms. Forehand's notes from that meeting, which Blue Cross NC will produce on or before May 26, 2023.

7. Identify all Persons that formulated, drafted, or approved questions listed in Addenda 1 and 2 to the 2022 RFP, which were submitted to the Plan by Blue Cross NC.

RESPONSE: Blue Cross NC incorporates by reference its objections to the instructions and definitions as if fully stated herein. Subject to its objections and without waiving the same, Blue Cross NC states that Ms. Forehand, Mr. Watson, and individuals within each business area responsible for the requirement that was the subject of a question proposed questions. Ms. Forehand and Mr. Watson reviewed, edited, and approved the questions. MetreWorks also assisted in compiling and editing the questions for clarity, and attorneys within Blue Cross NC's legal team provided privileged advice.

8. Identify all questions listed in Addenda 1 and 2 to the 2022 RFP, which were submitted to the Plan by BCBSNC.

RESPONSE: Blue Cross NC incorporates by reference its objections to the instructions and definitions as if fully stated herein. Subject to its objections and without waiving the same, Blue Cross NC states that, for questions listed in Addendum 1, it submitted questions 19, 21, 24, 25, 26, 29, and 30. Blue Cross NC further states that, for questions listed in Addendum 2, it submitted questions 17, 18, 21, 36, 44, and 45.

9. Identify all prior procurements for third-party administrative services in which, to your knowledge, the Plan validated or confirmed vendors' network pricing using market data as described in paragraphs 56–59 of the Petition for Contested Case Hearing. For each instance, identify the market data used and describe how the Plan did so.

RESPONSE: Blue Cross NC incorporates by reference its objections to the instructions and definitions as if fully stated herein. Subject to its objections and without waiving the same, Blue Cross NC states that it has no knowledge of the Plan's validation or confirmation processes for network pricing for prior procurements.

10. Identify all prior procurements for third-party administrative services in which, to your knowledge, the Plan validated or confirmed vendors' ability to meet the technical requirements of the request for proposal as described in paragraphs 80–81 of the Petition for Contested Case Hearing. In each case, identify the relevant technical requirements and describe how the Plan did so.

RESPONSE: Blue Cross NC incorporates by reference its objections to the instructions and definitions as if fully stated herein. Subject to its objections and without waiving the same, Blue Cross NC states that the Plan's prior RFPs for third-party administrative services required each vendor to provide written explanations to explain how the vendor would satisfy the RFP's technical requirements, and that the request for these explanations is itself a method of validation or confirmation.

Blue Cross NC further states that prior RFPs issued by the Plan included a process by which the Plan could request that finalists for prior RFPs make presentations, during which the Plan could validate or confirm vendors' ability to meet technical requirements. Blue Cross NC further states that in the past the

Plan has requested that Blue Cross NC make these finalist presentations. Prior to the presentations, the Plan sent written questions to Blue Cross NC asking it to elaborate on its ability to meet certain requirements. Blue Cross NC submitted answers to these questions before the presentations. At the presentations, Blue Cross NC gave an overview of these answers, and the Plan asked more questions. After the presentations, the Plan required Blue Cross NC to submit written answers to the questions that the Plan raised in the presentations. The Plan treated these written answers as addenda to Blue Cross NC's submissions.

11. Identify all Persons that drafted, approved, were consulted, or otherwise substantively aided in the preparation of Blue Cross NC's protest of the Plan's December 14, 2022 decision to award a contract for third-party administrative services to Aetna. For each person identified, describe the nature and extent of their involvement.

RESPONSE: Blue Cross NC incorporates by reference its objections to the instructions and definitions as if fully stated herein. Blue Cross NC further objects to this interrogatory because it calls for the disclosure of attorney-client privileged communications and materials protected by the work-product doctrine.

Subject to its objections and without waiving the same, Blue Cross NC answers that its litigation counsel in this case prepared the bid-protest letter and petition for contested case in this matter, in coordination with appropriate persons affiliated with Blue Cross NC.

REQUESTS FOR PRODUCTION OF DOCUMENTS

1. Produce all documents referred to, relied upon, or identified in response to any Interrogatory.

RESPONSE: Blue Cross NC incorporates by reference its objections to the instructions and definitions as if fully stated herein. Blue Cross NC also objects to this request because it calls for the production of materials protected by the attorney-client privilege and/or the work-product doctrine. Blue Cross NC further objects to this Request as unduly burdensome to the extent that it would require Blue Cross NC to produce documents that were merely reviewed in an effort to identify the information or documents necessary to respond to the Interrogatories. Subject to its objections and without waiving the same, Blue Cross NC states that it will produce responsive, non-privileged documents in its possession, custody, or control on or before May 26, 2023.

2. Produce Blue Cross NC's complete submission to the Plan in response to the 2022 RFP, including all attachments, clarifications, Best and Final Offer proposals, and supporting materials. Documents responsive to this request should be produced in Excel if they exist in that format and should be unredacted unless redactions are expressly authorized by a Protective Order.

RESPONSE: Blue Cross NC incorporates by reference its objections to the instructions and definitions as if fully stated herein. Subject to its objections and without waiving the same, Blue Cross NC states that it will produce its complete submission to the Plan in response to the 2022 RFP with the provisional designation of "Highly Confidential—Attorneys' Eyes Only," pending Blue Cross NC's completion of its review of the submission for confidential information.

3. Produce all documents and communications with the Plan concerning or regarding Blue Cross NC's performance of the contract for third-party administrative services awarded pursuant to the 2019 RFP.

RESPONSE: Blue Cross NC incorporates by reference its objections to the instructions and definitions as if fully stated herein. Blue Cross NC further objects to this request because it is not reasonably calculated to lead to the discovery of admissible evidence because the requested information is not among the evaluation criteria for the 2022 RFP. Blue Cross NC also objects to the request as unduly burdensome because it would obligate Blue Cross NC to gather and search vast quantities of material of limited or no relevance to the issues in this case. Blue Cross NC personnel have had thousands of communications with Plan personnel regarding Blue Cross NC's work as the third-party administrator for the current TPA contract. Blue Cross also objects to this request because it calls for the production of material protected by the attorney-client privilege and/or the work-product doctrine.

Pursuant to these objections, Blue Cross NC will not produce documents responsive to this request.

4. Produce all communications between Blue Cross NC and the Plan related to the 2022 RFP, including the Plan's decision to issue the 2022 RFP.

RESPONSE: Blue Cross NC incorporates by reference its objections to the instructions and definitions as if fully stated herein. Subject to its objections and without waiving the same, Blue Cross NC states that on or before May 26, 2023, upon conducting a reasonably diligent search, it will produce any documents in its possession, custody, or control that are responsive to this request.

5. Produce all communications between BCBSNC and the Plan related to or arising from BCBSNC's January 12, 2023 Request for Protest Meeting.

RESPONSE: Blue Cross NC incorporates by reference its objections to the instructions and definitions as if fully stated herein. Subject to its objections and without waiving the same, Blue Cross NC states that on or before May 26, 2023, upon conducting a reasonably diligent search, it will produce any documents in its possession, custody, or control that are responsive to this request.

6. Produce all documents and communications that Blue Cross NC believes were available to the Plan on or before December 14, 2022, which support BCBSNC's contentions that certain technical requirements in the 2022 RFP are impossible, not possible for Aetna to meet as alleged in paragraph 80 of Blue Cross NC's Petition for Contested Case Hearing, or are not in the best interest of the Plan's members.

RESPONSE: Blue Cross NC incorporates by reference its objections to the instructions and definitions as if fully stated herein. Blue Cross NC further objects to this request because it calls for Blue Cross NC to produce documents outside of its possession, custody, or control. In addition, Blue Cross NC objects to this request because it is unduly burdensome for Blue Cross NC to discern what materials might have been available to the Plan on these topics. Subject to its objections and without waiving the same, Blue Cross NC states that on or before May 26, 2023, upon conducting a reasonably diligent search, it will produce any documents in its possession, custody, or control that are responsive to this request.

7. Produce any market data that was available to the Plan no later than December 14, 2022, which supports Blue Cross NC's allegation that Aetna's network pricing in North Carolina is higher than Blue Cross NC's North Carolina pricing, as referenced in paragraphs 56–57 of BCBSNC's Petition for Contested Case Hearing.

RESPONSE: Blue Cross NC incorporates by reference its objections to the instructions and definitions as if fully stated herein. Subject to its objections and without waiving the same, Blue Cross NC responds that the Plan could have obtained Uniform Data Submission data concerning network pricing before December 14, 2022.

8. Subject to any disclosure deadlines pertaining to expert witnesses separately agreed to by the Parties, for each person whom Blue Cross NC intends to call or reserves the right to call as an expert witness at the hearing, produce:

- a. All documents and communications provided by Blue Cross NC or its attorneys to any expert witness retained by Blue Cross NC or its counsel in connection with this matter;
- b. All reports prepared by such expert;
- c. The documents, data, and/or other information reviewed or considered by the expert witness in forming his or her opinions;
- d. The expert witness' curriculum vitae;
- e. A list of publications authored by the expert witness within the preceding ten (10) years;
- f. All exhibits used as support for the expert's opinions;
- g. Any documents relating to the compensation arrangements between BCBSNC or its counsel and the expert witness; and
- h. A list of all other cases in which the witness has testified as an expert at trial or deposition within the preceding five (5) years.

RESPONSE: Blue Cross NC incorporates by reference its objections to the instructions and definitions as if fully stated herein. Blue Cross NC further objects

to this request to the extent that it requests materials beyond the requirements in Rule 26(b)(4)(a)(2) and requests communications beyond those permitted by Rule 26(b)(4)(a)(5). Subject to these objections and the General Objections, Blue Cross NC will make expert disclosures as required in section 4 of the Scheduling Order on or before September 8, 2023, and shall serve any rebuttal reports on or before October 20, 2023.

This the 16th day of May, 2023.

ROBINSON, BRADSHAW & HINSON, P.A.

/s/ Matthew W. Sawchak
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 Blue Cross Blue Shield of North
Carolina

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing document was served on the following by electronic mail at the electronic mailing addresses shown below:

Aaron Vodicka, Esq,
North Carolina State Health Plan for Teachers and State Employees
aaron.vodicka@nctreasurer.com

Robert H. Edmunds, Jr., Esq.
Fox Rothschild LLP
bedmunds@foxrothschild.com

Marcus C. Hewitt, Esq.
Fox Rothschild LLP
mhewitt@foxrothschild.com

Elizabeth Sims Hedrick, Esq.
Fox Rothschild LLP
ehedrick@foxrothschild.com

Attorneys for Respondent

Lee M. Whitman, Esq.
Wyrick Robbins Yates & Ponton LLP
lwhitman@wyrick.com

Benjamin N. Thompson, Esq.
Wyrick Robbins Yates & Ponton LLP
bthompson@wyrick.com

Sophia V. Blair, Esq.
Wyrick Robbins Yates & Ponton LLP
sblair@wyrick.com

Attorneys for Respondent-Intervenor

This 16th day of May, 2023.

/s/ Nathan C. Chase, Jr. _____
Nathan C. Chase, Jr.

VERIFICATION

Aimee Forehand, being first duly sworn, deposes and says that she has read the foregoing **BLUE CROSS NC'S RESPONSES TO AETNA'S FIRST SET OF INTERROGATORIES** and knows the contents thereof and the same is true of her own knowledge, except as to those matters therein stated upon information and belief, and as to those matters she believes them to be true.



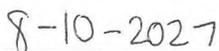
Aimee Forehand

Sworn to and subscribed
before me, this 12th day of
May, 2023.



Notary Public

My commission expires:



(Official Seal)

