

FILED

Jun 25  
2014 JUL -7 A 9:3  
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STATE OF WASHINGTON  
OFFICE OF THE INSURANCE COMMISSIONER

In re	}	
Seattle Children's Hospital's Appeal of OIC's Approvals of HBE Plan Filings,	}	DOCKET NO. 13-0293
	}	PREMERA BLUE CROSS'
	}	DISCLOSURE OF POSSIBLE
	}	WITNESSES

Premera Blue Cross submits the following list of potential witnesses to be called at the hearing.

**1. Rich Maturi.**

Rich Maturi is Senior Vice President for Health Care Delivery Systems. He may be called on to testify regarding the issues relevant to this action, including but not limited to Premera's efforts with the OIC to approve and implement its Exchange Network, the efficiency and effectiveness of that network and Premera's interactions with Seattle Children's Hospital.

**2. Dr. John Espinola.**

Dr. Espinola is Premera's Vice President of Medical Services r. He may be called on to testify regarding the issues relevant to this action, including but not limited to Premera's efforts to insure its Members receive medically necessary treatment.

PREMERA BLUE CROSS' DISCLOSURE OF POSSIBLE  
WITNESSES - 1  
DOCKET NO. 13-0293

LANE POWELL PC  
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**3. Cory Capps.**

Cory Capps is an economist. He may be called on to testify regarding expert opinions on the role of high-value provider networks in containing health care costs and the necessity of competitive provider contracting under the Affordable Care Act.

**4. Waltraut Lehmann.**

Waltraut Lehmann is the Manager of Regulatory Affairs. He may be called on to testify regarding the issues relevant to this action, including but not limited to Premera's efforts in complying with all regulations and laws.

Any other individual identified during the course of discovery.

Any witnesses identified by the OIC, by Intervenors, or by Seattle Children's Hospital. Premera does not intend to waive and reserves the right to challenge any witnesses identified by the OIC or by Seattle Children's Hospital.

Premera reserves the right to supplement this list as discovery progresses.

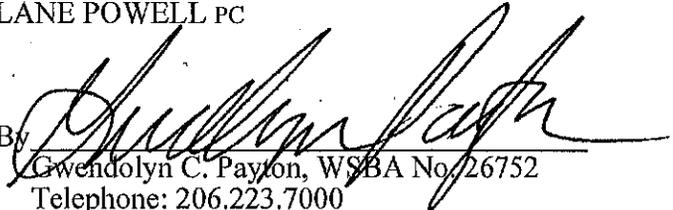
Premera reserves the right to amend and delete witnesses from this disclosure, due to scheduling or availability conflicts, new issues raised by any party during the course of discovery or as it otherwise becomes appropriate given the course of this action.

Premera has listed those witnesses who may be called to testify. However, by listing a name, Premera does not intend to waive and expressly reserves any privilege with respect to any witnesses listed herein. Premera maintains the right to full protection of all consulting experts as provided for by Washington State Civil Rules of Procedure and any applicable case law which prohibits parties from using any deposition, or portions thereof, of any consulting expert not chosen by Premera to be called as an expert to give testimony at the time of hearing.

DATED: June 25, 2014

LANE POWELL PC

By



Gwendolyn C. Payton, WSBA No. 26752

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Attorneys for Premera Blue Cross

PREMERA BLUE CROSS' DISCLOSURE OF POSSIBLE  
WITNESSES - 3  
DOCKET NO. 13-0293

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**CERTIFICATE OF SERVICE**

I, Ian Rountree, hereby certify under penalty of perjury of the laws of the State of Washington that on June 25, 2014, I caused to be served a copy of the attached document to the following person(s) in the manner indicated below at the following address(es):

<b><u>OIC HEARINGS UNIT</u></b> Office of the Insurance Commissioner 5000 Capitol Boulevard Tumwater, WA 98501 Email: kellyc@oic.wa.gov	<b><u>Seattle Children's Hospital</u></b> Michael Madden Bennett Bigelow & Leedom, P.S. 601 Union Street, Suite 1500 Seattle, WA 98101 Email: mmadden@bblaw.com
<b><u>Deputy Insurance Commissioner for Legal Affairs</u></b> AnnaLisa Gellerman Office of the Insurance Commissioner P.O. Box 40255 Olympia, WA 98504-0255 Email: annalisag@oic.wa.gov	<b><u>BridgeSpan Health Company</u></b> Timothy J. Parker Carney Badley Spellman 701 Fifth Avenue, Suite 3600 Seattle, WA 98104-7010 Email: parker@carneylaw.com
	<b><u>Legal Affairs Division</u></b> <b><u>Office of the Insurance Commissioner</u></b> Charles Brown P.O. Box 40255 Olympia, WA 98504-0255 Email: charlesb@oic.wa.gov

- by CM/ECF
- by Electronic Mail
- by Facsimile Transmission
- by First Class Mail
- by Hand Delivery
- by Overnight Delivery

  
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Ian Rountree

PREMERA BLUE CROSS' DISCLOSURE OF POSSIBLE  
WITNESSES - 4  
DOCKET NO. 13-0293