

Cairns, Kelly (OIC)

FILED

From: Carol Sue Janes [csjanes@bllaw.com]
Sent: Tuesday, August 12, 2014 5:19 PM
To: Walder, Jessica N.; Mike Madden
Cc: Gellermann, AnnaLisa (OIC); Brown, Charles (OIC); parker@carneylaw.com; anderson@carneylaw.com; Payton, Gwendolyn; Williams@carneylaw.com; Philhower, Andrea (OIC); Anne E. Ebbighausen; Jennifer K. Lenox; Gerri E. Downs; Rountree, Ian; Cairns, Kelly (OIC); gfinkle@jdrllc.com; forbes@jdrllc.com
Subject: RE: In re Seattle Children's Hospital - No. 13-0293

Ms. Walder –

To assist with your review of the additional SCH exhibits, please note:

2 documents are unnecessary duplicates of other SCH Exhibits (SCH Ex. 177 and 249 are duplicates; SCH Ex. 236 and SCH Ex. 259 are duplicates)

2 documents are unnecessary duplicates of prior deposition exhibits (SCH 258 is a duplicate of portions of Dep. Ex. 36; SCH 259 is a duplicate of portions of Dep. Ex. 35)

As to the remaining 95 exhibits:

40 of the documents have previously been provided to the OIC and Intervenors, either as part of SCH or OIC discovery responses, attachments to declarations, or otherwise.

21 of the documents were obtained from the OIC website (4 of the items were oral recordings of the CCC hearing that SCH had transcribed), including documents relating to the Premera/LifeWise or BridgeSpan applications.

11 of the documents are derived from other publicly-accessible websites, including, for example, the Department of Health, the Washington State Health Benefit Exchange, and others.

Of the remaining 23 documents, 6 are articles from the medical literature; 3 are letters from SCH previously sent to Commissioner Kreidler (from Oct 2013 to March 2014); 2 are transcriptions of testimony to the NAIC regarding network adequacy; 3 are illustrative; 1 is an August 2014 e-mail exchange between SCH and Regence (SCH Ex. 246), and 8 are in response to Premera's supplemental subpoena to Suzanne Vanderwerff containing information not available at the time of her prior deposition (SCH Exs. 267-274).

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From: Walder, Jessica N. [<mailto:WalderJ@LanePowell.com>]
Sent: Monday, August 11, 2014 6:19 PM
To: Mike Madden; Carol Sue Janes
Cc: annalisag@oic.wa.gov; charlesb@oic.wa.gov; parker@carneylaw.com; anderson@carneylaw.com; Payton,

Gwendolyn; Williams@carneylaw.com; andreap@oic.wa.gov; Anne E. Ebbighausen; Jennifer K. Lenox; Gerri E. Downs; Rountree, Ian; kellyc@oic.wa.gov; gfinkle@jdrllc.com; forbes@jdrllc.com
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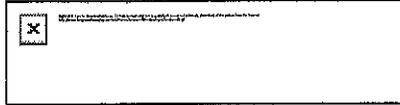
Counsel,

Please see the attached letter to your attention. Another copy to follow via USPS.

Best,

Jessica

Jessica N. Walder



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