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Richard J. Birmingham
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2015 MAY 26 A 9:21
richbj@birmingham@dwt.com
Filed by email 5/20/15

May 20, 2015

Via U.S. mail and email: KellyC@oic.wa.gov

Judge George Finkle
c/o Kelly Cairns
PO Box 40255
Olympia WA 98504

Re: Northwest Financial Association's Employee Benefit Trust; Washington Biotechnology and Biomedical Association Health Trust; Washington Clean Technology Alliance Health Trust – Status Conference

Dear Judge Finkle:

At the status conference, we will be representing the above-referenced entities and the Association Health Plans. We do not represent the Insurance carrier. With respect to tomorrow's status conference, we are requesting:

1. permission to engage in limited discovery and consolidated discovery on behalf of the above-referenced entities, and
2. a dispositive motion schedule beginning in August or September to give the parties time to produce and review the discovery.

While we believe that the issue of ratings will be decided on a summary judgment motion, it is our desire to first engage in limited discovery through requests for admissions, interrogatories, and requests for production. Therefore, we request your permission to file the attached discovery requests. Similar requests have already been filed in related state and federal proceedings. Therefore, the productions and answers to the interrogatories should not be burdensome. We suggest that no dispositive motions be set before August, in order to allow time for the production and review of discovery documents.

While we believe that the ratings issues will be resolved on summary judgment, limited discovery is necessary to identify the specific rating concerns and analysis utilized by the OIC. Pending motions before this tribunal involving other Association Health Plans, which will likely be decided in July, will also be relevant to the briefing and would also dictate an August or September date for dispositive motions.

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Judge George Finkle
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We have matters pending in state court that may affect the jurisdiction of this administrative tribunal. However, we believe that those issues will be decided by August, so we are not seeking a stay of the administrative proceedings at this time.

In summary, we are asking permission to serve the attached discovery requests and then to set a schedule for dispositive motions in August or September (due to vacation schedules), after we have had a chance to review the discovery produced.

Very truly yours

Davis Wright Tremaine LLP

A handwritten signature in black ink, appearing to read 'Richard J. Birmingham', written over a light blue horizontal line.

Richard J. Birmingham

cc: Charles Brown: CharlesB@OIC.WA.GOV

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2
3 **BEFORE THE STATE OF WASHINGTON**
4 **OFFICE OF THE INSURANCE COMMISSIONER**

5 In the Matter of

6 **Northwest Financial Association's Employee**
7 **Benefit Trust, Washington Biotechnology**
8 **and Biomedical Association Health Trust,**
9 **and Washington Clean Technology Alliance**
10 **Health Trust**

11 Aggrieved Parties

Docket Nos. 15-0087, 15-0107, 15-0110

12 **AGGRIEVED PARTIES' FIRST**
13 **INTERROGATORIES AND**
14 **REQUESTS FOR PRODUCTION**

15 TO: The State of Washington Office of the Insurance Commissioner

16 AND TO: Charles Brown

17 Pursuant to RCW 34.05.446 and Rules 26, 33, and 34 of the Superior Court Civil Rules,
18 the Aggrieved Parties, through their counsel, hereby request that the State of Washington Office of
19 the Insurance Commissioner answer the following interrogatories under oath and respond to the
20 following requests and produce the items specified herein for inspection and copying to
21 Richard J. Birmingham at the office of Davis Wright Tremaine LLP, 1201 Third Avenue,
22 Suite 2200, Seattle, WA 98101 within thirty (30) days after the service of these Requests, or at
23 such other time and place as may be agreed upon by counsel.

24 These requests for production are to be treated as continuing. If information is not
25 available within the time set out above, you must answer each request for production as fully as
26 possible within the time limit and furnish additional information when it becomes available. If
27 additional information is discovered between the time of making these answers and the time of
trial, supplemental answers must be provided within a reasonable time. If such information is
AGGRIEVED PARTIES' FIRST INTERROGATORIES AND
REQUESTS FOR PRODUCTION

(Docket Nos. 15-0087, 15-0107, 15-0110) - 1

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1 not furnished, Plaintiffs will move at the time of trial to exclude from evidence any information
2 requested and not furnished or will move for such other sanctions as are appropriate.

3 If your answer to any request for production or sub-part thereof is "not applicable,"
4 describe in detail your reasons for making such reply.

5 DEFINITIONS

6 "Aggrieved Parties" refers collectively to Northwest Financial Association's Employee
7 Benefit Trust, the Washington Biotechnology and Biomedical Association Health Trust, and/or
8 the Washington Clean Technology Alliance Health Trust.

9 "OIC," "you," and "your" refer without limitation to Mike Kreidler, in his capacity as
10 Washington State Insurance Commissioner, his attorneys and agents, the State of Washington
11 Office of the Insurance Commissioner, and all persons acting on behalf of the State of
12 Washington Office of the Insurance Commissioner.

13 "Premera" refers to Premera Blue Cross.

14 "2014 Insurance Contract" refers to the 2014 insurance contracts submitted by Premera
15 on behalf of the Aggrieved Parties.

16 "Person" means an individual, firm, partnership, corporation, proprietorship,
17 association, governmental body, or any other organization or entity.

18 "Document" means any writing or other tangible thing in the OIC's custody, possession
19 or control or known to the OIC, whether printed, recorded, electronic, or written or produced
20 by hand. If any document is withheld under a claim of privilege, provide sufficient information
21 to determine the identity of the document and state the basis for any asserted claim of privilege
22 so the Court and the parties may determine the validity of the privilege claim.
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26 AGGRIEVED PARTIES' FIRST INTERROGATORIES AND
27 REQUESTS FOR PRODUCTION

(Docket Nos. 15-0087, 15-0107, 15-0110) - 2

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1 "Communications" if referred to in this request are defined to include but not be limited
2 to meetings, personal conferences, telephone conferences, memoranda, notes, letters and other
3 written and oral communications.

4 "Refer to," "reflect" or "relate to" shall mean directly or indirectly, or in any way
5 alluding to, responding to, in connection with, commenting on, in response to, about, regarding,
6 announcing, explaining, discussing, showing, describing, studying, reflecting, analyzing,
7 comprising or constituting.

8 "Relevant period" shall mean the period from March 23, 2010, to the present date.
9 Unless otherwise provided, each interrogatory or request herein shall be read to include all
10 information which relates in whole or in part to the relevant period, or to events or
11 circumstances during such period, even though dated, prepared, generated, or received prior to
12 that period. Unless otherwise indicated, these requests are limited to the relevant period.
13

14 If the OIC objects to part of a document request and refuses to answer or produce
15 pursuant to that part, the OIC should state its objection and answer or produce pursuant to the
16 remainder of that document request. If the OIC objects to the scope or time period of a
17 document request and refuses to answer for that scope or time period, the OIC should state its
18 objection and answer the document request for the scope or time period it believes is
19 appropriate.
20

21 Each of the following interrogatories and document requests shall be deemed
22 continuing in the manner provided by law.
23

24 INTERROGATORIES

25 **INTERROGATORY NO. 1:** Identify all persons who assisted you in the review of

26 AGGRIEVED PARTIES' FIRST INTERROGATORIES AND
27 REQUESTS FOR PRODUCTION

(Docket Nos. 15-0087, 15-0107, 15-0110) - 3

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1 the 2014 Insurance Contracts filed by Premera on behalf of the Aggrieved Parties. For each
2 person identified, please set forth the date and substance of the communications and their
3 contact information.

4 **ANSWER:**

5
6 **INTERROGATORY NO. 2:** Identify all persons at the U.S. Department of Labor, or
7 any other federal agency, with whom you had communications that refer or relate to the rating
8 methodology utilized by Premera on behalf of the Aggrieved Parties. For each person
9 identified, please set forth the date and substance of the communications and their contact
10 information.
11

12 **ANSWER:**

13
14 **INTERROGATORY NO. 3:** Identify all persons at the Washington State agency
15 level with whom you had communications that refer or relate to the rating methodology utilized
16 by Premera on behalf of the Aggrieved Parties. For each person identified, please set forth the
17 date and substance of the communications and their contact information.
18

19 **ANSWER:**

20
21 **INTERROGATORY NO. 4:** Did you have communications with persons at the
22 Federal agency level or Washington State agency level that relate to the audit of any
23 associations, industry groups or city chambers and/or their group health plans during the
24 relevant period? For each person identified, please set forth the date and substance of the
25

26 AGGRIEVED PARTIES' FIRST INTERROGATORIES AND
27 REQUESTS FOR PRODUCTION

(Docket Nos. 15-0087, 15-0107, 15-0110) - 4

1 communications and their contact information.

2 **ANSWER:**

3
4 **INTERROGATORY NO. 5:** Identify any specific authority under the Affordable
5 Care Act or other federal law that preempts existing state law that permits association health
6 plans to rate employers at the purchasing group level.

7 **ANSWER:**

8
9
10 **INTERROGATORY NO. 6:** For each rating tier in the 2014 Insurance Contracts
11 submitted by Premera on behalf of the Aggrieved Parties, please describe the specific reason(s)
12 that such rating tier was disapproved.

13 **ANSWER:**

14
15 **INTERROGATORY NO. 7:** Identify the OIC's authority for requiring the Aggrieved
16 Parties to use a rating methodology different from those required by RCW 40.44.024(2).

17 **ANSWER:**

18
19
20 **REQUESTS FOR PRODUCTION**

21 **REQUEST FOR PRODUCTION NO. 1:** Produce all documents that relate to
22 communications with any person at the U.S Department of Labor or any state or federal agency
23 about associations or the rating methodology utilized by group health plans maintained by
24 associations during the relevant time period.
25

26 AGGRIEVED PARTIES' FIRST INTERROGATORIES AND
27 REQUESTS FOR PRODUCTION

(Docket Nos. 15-0087, 15-0107, 15-0110) - 5

1 **RESPONSE:**

2
3 **REQUEST FOR PRODUCTION NO. 2:** Produce all documents that relate to
4 communications between the OIC and Premera concerning the rating methodology or rates
5 used for the Aggrieved Parties.

6 **RESPONSE:**

7
8 **REQUEST FOR PRODUCTION NO. 3:** Produce all SERFF filings, the OIC's
9 objections, carriers' responses, and supplemental documentation that relate to the rating
10 methodology or rates used in an insurance contract filed on behalf of any association.

11 **RESPONSE:**

12
13 **REQUEST FOR PRODUCTION NO. 4:** Produce all documents that relate to your
14 rationale for disapproving any rate filing applications of Premera based on rating methodology.
15

16 **RESPONSE:**

17
18 **REQUEST FOR PRODUCTION NO. 5:** Produce all documents and
19 communications between current and former OIC employees and any other individual or
20 agency that relate to the rating methodology or rates used by a health plan offered to an
21 association.
22

23 **RESPONSE:**

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25
26 AGGRIEVED PARTIES' FIRST INTERROGATORIES AND
27 REQUESTS FOR PRODUCTION

(Docket Nos. 15-0087, 15-0107, 15-0110) - 6

1 **REQUEST FOR PRODUCTION NO. 6:** Produce all documents that refer to

2 Technical Assistance Advisory 06-07.

3 **RESPONSE:**

4
5
6 **REQUEST FOR PRODUCTION NO. 7:** Produce all documents that refer to or are

7 related to the Superior Court of Washington for Spokane County's determination in *Associated*
8 *Industries of the Inland Northwest, et. al. v. State of Washington Office of the Insurance*
9 *Commissioner, Mike Kreidler*, No. 2007-02-00592-1.

10 **RESPONSE:**

11
12
13 **REQUEST FOR PRODUCTION NO. 8:** Produce all training materials and guidance,

14 including but not limited to rating guidance, issued by the OIC to carriers concerning large
15 group health plans offered to associations.

16 **RESPONSE:**

17
18
19 **REQUEST FOR PRODUCTION NO. 9:** Produce all documents related to your

20 Answer to Interrogatory No. 5.

21 **RESPONSE:**

22
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24 **REQUEST FOR PRODUCTION NO. 10:** Produce all documents related to your

25 Answer to Interrogatory No. 6.

26 AGGRIEVED PARTIES' FIRST INTERROGATORIES AND
27 REQUESTS FOR PRODUCTION

(Docket Nos. 15-0087, 15-0107, 15-0110) - 7

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1 **RESPONSE:**

2

3 **REQUEST FOR PRODUCTION NO. 11:** Produce all documents related to your

4 Answer to Interrogatory No. 7.

5 **RESPONSE:**

6

7 **REQUEST FOR PRODUCTION NO. 12:** Produce all documents and electronically

8 stored information relating to Jim Keogh's analysis of health plans sold to the small group

9 market compared to health plans sold to small employers through association health plans, such

10 analysis related to his Declaration, dated April 27, 2015.

11

12 **RESPONSE:**

13

14 **REQUEST FOR PRODUCTION NO. 13:** Produce all documents and data relied on

15 to produce Exhibit A, Charts 1-7, to Jim Keogh's Declaration, dated April 27, 2015.

16

17 **RESPONSE:**

18

19 **REQUEST FOR PRODUCTION NO. 14:** Produce any data that compares the dollar

20 premiums that males age 40-50 pay in small group plans with the dollar premiums that males

21 age 40-50 pay in association health plans or large group health plans.

22

23 **RESPONSE:**

24

25

26 AGGRIEVED PARTIES' FIRST INTERROGATORIES AND

27 REQUESTS FOR PRODUCTION

(Docket Nos. 15-0087, 15-0107, 15-0110) - 8

1 **REQUEST FOR PRODUCTION NO. 15:** Produce any data that compares the dollar
2 premiums that women in child bearing years pay in small group plans with the dollar premiums
3 paid by women in child bearing years in association health plans or large group health plans.

4 **RESPONSE:**

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6
7 **REQUEST FOR PRODUCTION NO. 16:** Produce all documents, electronically
8 stored information, and tangible things that you have in your possession, custody, or control
9 and that you may use to support your claims or that may undermine your claims.

10 **RESPONSE:**

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26 AGGRIEVED PARTIES' FIRST INTERROGATORIES AND
27 REQUESTS FOR PRODUCTION

(Docket Nos. 15-0087, 15-0107, 15-0110) - 9

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RESPECTFULLY SUBMITTED this ____ day of May, 2015.

DAVIS WRIGHT TREMAINE LLP
Attorneys for Aggrieved Parties

By /s/ Richard J. Birmingham
Richard J. Birmingham, WSBA #8685
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By /s/ Christine Hawkins
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AGGRIEVED PARTIES' FIRST INTERROGATORIES AND
REQUESTS FOR PRODUCTION

(Docket Nos. 15-0087, 15-0107, 15-0110) - 10

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PROOF OF SERVICE

I certify that I served a copy of this document on all parties or their counsel of record on the date below as follows:

Electronically and via Certified US Mail

Charles Brown
Assistant Attorney General
Office of the Attorney General
Government Compliance and Enforcement Division
1125 Washington Street SE
P.O. Box 40100
Olympia, WA 98504-0100
CharlesB@atg.wa.gov

I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

DATED this ____ day of May, 2015, at Bellevue, Washington.

Davis Wright Tremaine LLP
Attorneys for Plaintiffs

By /s/ Christine Hawkins

Christine Hawkins, WSBA #44972
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777 108th Avenue NE
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AGGRIEVED PARTIES' FIRST INTERROGATORIES AND
REQUESTS FOR PRODUCTION

(Docket Nos. 15-0087, 15-0107, 15-0110) - 11

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3 **BEFORE THE STATE OF WASHINGTON**
4 **OFFICE OF THE INSURANCE COMMISSIONER**

5 In the Matter of

6 **Northwest Financial Association's Employee**
7 **Benefit Trust, Washington Biotechnology**
8 **and Biomedical Association Health Trust,**
9 **and Washington Clean Technology Alliance**
10 **Health Trust**

Aggrieved Parties

Docket Nos. 15-0087, 15-0107, 15-0110

AGGRIEVED PARTIES' FIRST
REQUESTS FOR ADMISSION

11 TO: The State of Washington Office of the Insurance Commissioner

12 AND TO: Charles Brown

13 Pursuant to RCW 34.05.446 and Rule 36 of the Superior Court Civil Rules, the Aggrieved
14 Parties, through their counsel, hereby request that the State of Washington Office of the Insurance
15 Commissioner respond to Aggrieved Parties' First Requests for Admission within thirty (30) days
16 after service of this Request to Richard J. Birmingham at the office of Davis Wright Tremaine
17 LLP, 1201 Third Avenue, Suite 2200, Seattle, WA 98101, or at such location as is mutually
18 agreed upon by counsel.

19 **DEFINITIONS**

20 "Aggrieved Parties" refers collectively to Northwest Financial Association's Employee
21 Benefit Trust, the Washington Biotechnology and Biomedical Association Health Trust, and/or
22 the Washington Clean Technology Alliance Health Trust.

23 "OIC," "you," and "your" refer without limitation to Mike Kreidler, in his capacity as
24 Washington State Insurance Commissioner, his attorneys and agents, the State of Washington
25 Office of the Insurance Commissioner, and all persons acting on behalf of the State of

26 AGGRIEVED PARTIES' FIRST REQUESTS FOR ADMISSION

27 (Docket Nos. 15-0087, 15-0107, 15-0110) - 1

1 Washington Office of the Insurance Commissioner.

2 "Premera" refers to Premera Blue Cross.

3 "2014 Insurance Contract" refers to the 2014 insurance contracts submitted by Premera
4 on behalf of the Aggrieved Parties.

5 **INSTRUCTIONS**

6 The following instructions are an integral part of these requests and apply to each of
7 them, as well as to any other discovery requests incorporating these instructions.

8
9 1. Your response must either specifically admit or deny each matter or explain in
10 detail the reasons why you cannot truthfully admit or deny a matter.

11 2. If you object to any of the definitions or instructions applicable to these requests,
12 state your objections in your response and clearly indicate whether you are complying with the
13 definition or instruction notwithstanding your objection.

14 3. Whenever objection is made to any portion of any request, a response shall be
15 furnished to so much of the request as to which there is no objection.

16
17 4. If you encounter any ambiguity in construing a request, or the definition or
18 instruction relevant to the request, set forth the matter deemed "ambiguous" and set forth the
19 construction chosen or used in responding.

20 **REQUESTS FOR ADMISSION**

21 **REQUEST FOR ADMISSION NO. 1:** Admit that RCW 48.44.024 is a statutory
22 exception to RCW 48.22.023 and permits associations to offer to their members health care
23 plans where the premium for each respective participating employer has been calculated
24 without utilizing small group rating methodology.

25
26 **RESPONSE:**

27 AGGRIEVED PARTIES' FIRST REQUESTS FOR ADMISSION

(Docket Nos. 15-0087, 15-0107, 15-0110) - 2

1
2 **REQUEST FOR ADMISSION NO. 2:** Admit that in 2006, the OIC issued Technical
3 Assistance Advisory (TAA) 06:07, which purported to change the exemption carved out in
4 RCW 48.44.024 by requiring associations to rate the entire membership as one group.

5 **RESPONSE:**

6
7 **REQUEST FOR ADMISSION NO. 3:** Admit that the Superior Court of Washington
8 for Spokane County determined that the OIC violated the Washington State constitution by
9 changing the rating structure set forth in RCW 48.44.024 without legislative authority to do so
10 in *Associated Industries of the Inland Northwest, et. al. v. State of Washington Office of the*
11 *Insurance Commissioner, Mike Kreidler*, No. 2007-02-00592-1.

12 **RESPONSE:**

13
14 **REQUEST FOR ADMISSION NO. 4:** Admit that the OIC applied the rating
15 methodology issued in TA 06:07 in its disapprovals of the 2014 Insurance Contracts marketed
16 to and sold by the Aggrieved Parties.

17 **RESPONSE:**

18
19 **REQUEST FOR ADMISSION NO. 5:** Admit that the rating methodology used in
20 the disapproved 2014 Insurance Contracts satisfies RCW 48.44.020(3) and WAC 284-43-
21 915(2).

22 **RESPONSE:**

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27 AGGRIEVED PARTIES' FIRST REQUESTS FOR ADMISSION

(Docket Nos. 15-0087, 15-0107, 15-0110) - 3

1 **REQUEST FOR ADMISSION NO. 6:** Admit that the OIC's enactment of WAC 284-
2 170-958 is purportedly in response to and under the authority of the Affordable Care Act.

3 **RESPONSE:**

4
5 **REQUEST FOR ADMISSION NO. 7:** Admit that no provision of the Affordable
6 Care Act rating rules apply to large-group coverage unless such coverage is offered through the
7 Washington State exchange.

8 **RESPONSE:**

9
10
11 **REQUEST FOR ADMISSION NO. 8:** Admit that nothing in federal law requires the
12 Aggrieved Parties to change their historic rating methodology.

13 **RESPONSE:**

14
15 **REQUEST FOR ADMISSION NO. 9:** Admit that the OIC's disapproval of the 2014
16 Insurance Contracts has no impact on coverage offered to employees and dependents for 2014
17 because the 2014 Insurance Contracts have expired and no one is currently covered by such
18 policies.
19

20 **RESPONSE:**

21
22 **REQUEST FOR ADMISSION NO. 10:** Admit that the OIC's disapproval of the
23 2014 Insurance Contracts has no impact on the Aggrieved Parties' ability to legally market and
24 cover employees and dependents under the 2015 insurance policies.
25

26 **RESPONSE:**

27 AGGRIEVED PARTIES' FIRST REQUESTS FOR ADMISSION

(Docket Nos. 15-0087, 15-0107, 15-0110) - 4

1
2 **REQUEST FOR ADMISSION NO. 17:** Admit that the OIC issued the following
3 advice at its webinar on September 26, 2012:

4 Although true employer health and welfare benefit plans will still be able to file
5 and market as large group if over 50 lives – the rates must be based on the overall
6 experience of the group and health status may not be used to set rates.

7 **RESPONSE:**

8
9 **REQUEST FOR ADMISSION NO. 18:** Admit that the advice issued at the OIC's
10 September 26, 2012, webinar is not a rule or a regulation issued or enforced by the OIC.

11 **RESPONSE:**

12
13 **REQUEST FOR ADMISSION NO. 19:** Admit that the advice issued at the OIC's
14 September 26, 2012, is substantially the same as the following advice set forth in TAA 06-07:

15 Rates must be based on the health of the entire association group. Any rating
16 based on the health information of any individual member employer is prohibited.

17 **RESPONSE:**

18
19 **REQUEST FOR ADMISSION NO. 20:** Admit that when issuing and enforcing TAA
20 06-07, the OIC argued that the entire association should be treated as a single group.

21 **RESPONSE:**

22
23
24 **REQUEST FOR ADMISSION NO. 21:** Admit that when issuing and enforcing TAA
25 06-07, the OIC argued that the rating of purchasing employers differently than the association
26

27 AGGRIEVED PARTIES' FIRST REQUESTS FOR ADMISSION

(Docket Nos. 15-0087, 15-0107, 15-0110) - 5

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1 as a group would violate the Health Insurance Portability and Accountability Act of 1996
2 (“HIPAA”).

3 **RESPONSE:**

4
5 **REQUEST FOR ADMISSION NO. 22:** Admit that the legislature has not changed
6 RCW 48.44.024(3) since its enactment.

7 **RESPONSE:**

8
9
10 **REQUEST FOR ADMISSION NO. 23:** Admit that the Superior Court of the State of
11 Washington for Spokane County found that the OIC’s interpretation of RCW 48.44.024(2) and
12 RCW 48.44.024(3) as set forth in TAA 06-7 was an exercise of legislative power by the OIC
13 and that the OIC did not have the constitutional authority to enact legislation.

14 **RESPONSE:**

15
16
17 **REQUEST FOR ADMISSION NO. 24:** Admit that no federal statute specifically
18 preempts RCW 48.44.024(2) or RCW 48.44.024(3).

19 **RESPONSE:**

20
21 **REQUEST FOR ADMISSION NO. 25:** Admit that under RCW 48.44.024(2) and
22 Washington State law, an association is permitted to establish rates at the employer purchasing
23 level.
24

25 **RESPONSE:**

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27 AGGRIEVED PARTIES’ FIRST REQUESTS FOR ADMISSION

(Docket Nos. 15-0087, 15-0107, 15-0110) - 6

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PROOF OF SERVICE

I certify that I served a copy of this document on all parties or their counsel of record on the date below as follows:

Electronically and via Certified US Mail

Charles Brown
Assistant Attorney General
Office of the Attorney General
Government Compliance and Enforcement Division
1125 Washington Street SE
P.O. Box 40100
Olympia, WA 98504-0100
CharlesB@atg.wa.gov

I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

DATED this ____ day of May, 2015, at Bellevue, Washington.

Davis Wright Tremaine LLP
Attorneys for Plaintiffs

By /s/ Christine Hawkins
Christine Hawkins, WSBA #44972
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AGGRIEVED PARTIES' FIRST REQUESTS FOR ADMISSION

(Docket Nos. 15-0087, 15-0107, 15-0110) - 8

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