

NINETEENTH JUDICIAL DISTRICT COURT

PARISH OF EAST BATON ROUGE

STATE OF LOUISIANA

J. ROBERT WOOLEY, AS ACTING	*	NUMBER:
COMMISSIONER OF INSURANCE FOR	*	
THE STATE OF LOUISIANA	*	
VERSUS	*	
GULF SOUTH HEALTH PLANS, INC.	*	DIVISION:

UNOPPOSED MOTION FOR LEAVE TO FILE PETITION OF INTERVENTION

NOW INTO COURT, through undersigned counsel, comes GENERAL HEALTH SYSTEM

("GENERAL HEALTH" OR THE "SYSTEM"), which respectfully represents that:

1.

This action was initiated by the filing of a petition (the "Commissioner's Petition") by the Honorable J. Robert Wooley, Acting Commissioner of Insurance for the State of Louisiana (the "Commissioner"). Respondent/Defendant herein is GULF SOUTH HEALTH PLANS, INC. ("Gulf South"). Gulf South is a domestic insurer organized and doing business under the laws of the State of Louisiana, which is qualified and is doing business as a health maintenance organization under Louisiana law, LSA- R.S. 22:2001 et seq. Gulf South maintains its statutory home office at 5615 Corporate Blvd., Baton Rouge, Louisiana.

2.

General Health is the parent corporation of Gulf South, owning 100% of the issued and outstanding stock of Gulf South. The System is a Louisiana nonprofit corporation, with its principal office located at 5757 Corporate Blvd., Baton Rouge, Louisiana 70808, and is the nonprofit parent company of a non-sectarian diversified healthcare system. General Health's Board of Trustees consists of community volunteers dedicated to the mission of the System. The System and its subsidiaries provides a wide variety of healthcare services along a continuum of care, designed to meet the healthcare needs of residents of the areas it serves. As of December, 2000, the System and its subsidiaries employed the equivalent of 2,933 full-time employees, with a total payroll in excess of \$113,000,000.

3.

As a part of the Commissioner's Petition, the Commissioner submitted a proposal for the wind up of the affairs of Gulf South pursuant to LSA-RS 22:2010(G) (the "Wind Up Plan") and requested that the Court issue an order approving the Wind Up Plan. Upon information and belief, the Court has signed such order (the "Wind Up Order").

4.

General Health has developed a comprehensive proposal (the "General Health Proposal") whereby General Health will make significant contributions to the wind up of the affairs of Gulf South so that Gulf South will be able to pay in full, over time, all valid claims owed to its enrollees, providers, and other creditors. The General Health Proposal was transmitted to the Commissioner by General Health's letter dated June 15, 2001 (see Exhibit 1 to the proposed Petition for Intervention filed herewith). The General Health Proposal sets forth the manner in which General Health will fund the contributions to be made by it to Gulf South as contemplated by and within the limitations of its September 17, 1997, letter to the Commissioner, a copy of which is attached to the Commissioner's Petition as Exhibit D, and provides the funding for the Wind Up Plan proposed by the Commissioner by which the valid claims of Gulf South's enrollees, providers and other creditors will be paid in full.

5.

The General Health Proposal also gives consideration to the importance of assuring the continued viability of General Health and its community mission healthcare system that is essential to Baton Rouge and the surrounding communities.

6.

General Health has engaged in extensive discussions with the Commissioner for over 60 days in connection with its development of the General Health Proposal so as to accommodate the requests of the Commissioner, in fulfilling his statutory duty to protect the interests of the enrollees, subscribers, providers and other creditors of Gulf South, that the terms thereof be in the best interest of these individuals and entities.

7.

Based upon its discussions with the Commissioner, General Health believes that the Commissioner is prepared to recommend to the Court that it approve the General Health Proposal as being in compliance with the Court's Wind Up Order


Based on the foregoing, General Health has a material interest in this proceeding, submits itself to the jurisdiction of this Court to the extent required to consummate the General Health Proposal, and therefore is entitled to intervene. Further, upon information and belief, the Commissioner and Gulf South do not oppose this intervention.

WHEREFORE, General Health System prays that the Court enter the attached order allowing the filing of its Petition of Intervention in these proceedings.

DATED this 19 day of June, 2001.

By Attorneys:

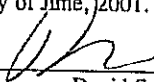
KANTROW, SPAHT, WEAVER & BLITZER
 (A PROFESSIONAL LAW CORPORATION)
 P. O. Box 2997
 Baton Rouge, Louisiana 70821-2997
 Telephone: 225/383-4703
 Telecopier: 225/343-0630

By: 
 Lee C. Kantrow (# 7620)
 David S. Rubin (#11525)

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion was hand-delivered or sent via facsimile to J. Robert Wooley, Acting Commissioner of Insurance, Attn: Ms. Claire I. Lemoine, 950 North 5th Street, Baton Rouge, LA 70804; Ms. Sue Buser, 10225 Florida Blvd., 8th Fl, Baton Rouge, LA 70815; Ms. Cassandra Sims, Louisiana Attorney General, State Capitol Building, Baton Rouge, Louisiana; and Gulf South Health Plans, Inc., 5615 Corporate Blvd., Baton Rouge, Louisiana 70808.

Baton Rouge, LA. this 19 day of June, 2001.


 David S. Rubin

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NINETEENTH JUDICIAL DISTRICT COURT
PARISH OF EAST BATON ROUGE
STATE OF LOUISIANA

J. ROBERT WOOLEY, AS ACTING
COMMISSIONER OF INSURANCE FOR
THE STATE OF LOUISIANA

NUMBER: 485005

VERSUS

GULF SOUTH HEALTH PLANS, INC.

DIVISION: J

TO: The Honorable Doug Welborn
Clerk of Court, 19th Judicial District Court
Parish of East Baton Rouge
Baton Rouge, Louisiana

June 18, 2001

Dear Sir:

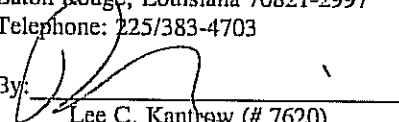
Pursuant to Articles 1571, *et seq.*, of the Louisiana Code of civil Procedure, we hereby request that you give to us, as counsel of record for General Health System, in the above numbered and entitled suit, written notice, by mail, at least ten (10) days in advance of any date fixed for any trial and/or hearing of this case, whether on exceptions, rules, and/or the merits thereof and/or otherwise, of any such assignment and/or fixing of the said case.

And as provided by Articles 1913, *et seq.*, of said Code, please also send to us immediately notice of any order and/or judgment made and/or signed and/or entered and/or rendered in this case, upon making and/or signing and/or rendition and/or entry of any such order and/or judgment.

Thank you, we are

Yours sincerely,
By Attorneys,

KANTROW, SPAHT, WEAVER & BLITZER
(A PROFESSIONAL LAW CORPORATION)
P. O. Box 2997
Baton Rouge, Louisiana 70821-2997
Telephone: 225/383-4703

By: 
Lee C. Kantrow (# 7620)
David S. Rubin (#11525)
W. Scott Keaty (#23151)

Attorneys for GENERAL HEALTH SYSTEM

19TH JUDICIAL DISTRICT COURT
PARISH OF EAST BATON ROUGE
STATE OF LOUISIANA
FILED
JUN 18 2001
DEPUTY CLERK OF COURT
DOUG WELBORN
CLERK OF DISTRICT COURT