

CIVIL DISTRICT COURT FOR THE PARISH OF ORLEANS

STATE OF LOUISIANA

NO. 2017-1095

DIVISION "C"

SECTION 10

ST. CHARLES SURGICAL HOSPITAL, LLC AND CENTER FOR RESTORATIVE  
BREAST SURGERY, LLC

VERSUS

LOUISIANA HEALTH SERVICE & INDEMNITY COMPANY D/B/A BLUE  
CROSS/BLUE SHIELD OF LOUISIANA, BLUE CROSS & BLUE SHIELD OF  
LOUISIANA, INC. AND HMO LOUISIANA, INC.

FILED: \_\_\_\_\_

DEPUTY CLERK

JURY INTERROGATORIES

FRAUD:

1. Do you find that St. Charles Surgical Hospital (the "Hospital") and the Center for Restorative Breast Surgery (the "Center") proved, by a preponderance of the evidence, that Blue Cross Blue Shield of Louisiana and HMO Louisiana, Inc. (collectively, "Blue Cross") committed fraud?

YES ☒

NO \_\_\_\_\_

*Please proceed to the next question.*

ABUSE OF RIGHTS:

2. Do you find that the Hospital and the Center proved, by a preponderance of the evidence, ANY of the following:
- i. That BCBSLA exercised rights exclusively for the purpose of harming the Hospital and the Center or with the predominant motive to cause harm? OR
  - ii. That BCBSLA did not have any serious or legitimate reason for exercising its rights? OR
  - iii. That the use of the right by BCBSLA was in violation of moral rules, good faith or elementary fairness? OR
  - iv. That the exercise of the right by BCBSLA was for a purpose other than that for which it was granted?

YES ☒

NO \_\_\_\_\_

*If your answer is "Yes" to Questions 1 or 2, please proceed to the next question. If your answer is "No" to both Question 1 and Question 2, please proceed to the end of the document, sign, and date this form, and return to the courtroom.*

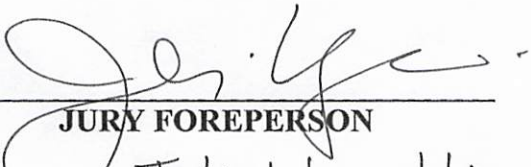
**DAMAGES:**

3. Please express in dollars the total monetary compensation, if any, Blue Cross owes to the Hospital and the Center for the damages?



a. Total Damages \$ 506,762,246.-  
b. Amounts Paid by BCBSLA: \$ 85,273,613.-  
c. Net Damages: \$ 421,488,633.-  
(subtract the amounts in "b" from the amounts in "a"):

**THE FOREPERSON SHOULD SIGN AND DATE THIS VERDICT. PLEASE TELL THE CLERK THAT YOU ARE DONE.**

New Orleans, Louisiana, this 20<sup>th</sup> day of September, 2024.

  
JURY FOREPERSON  
Juliet Laughlin

9/20/2024  
DATE

  
A TRUE COPY  
  
CLERK, CIVIL DISTRICT COURT  
PARISH OF ORLEANS



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