

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 20th day of September, 2024.

Juliet Laughlin

JURY FOREPERSON

9/20/2024

DATE



