

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

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**JAMES J. DONELON, IN HIS OFFICIAL  
CAPACITY AS COMMISSIONER OF INSURANCE  
FOR THE STATE OF LOUISIANA AND  
THE LOUISIANA DEPARTMENT OF INSURANCE**  
*Plaintiff*

**NUMBER: 713794**

**SECTION: 22**

**VERSUS**

**JESSICA K. ALTMAN, IN HER CAPACITY AS STATUTORY  
REHABILITATOR OF SENIOR HEALTH INSURANCE COMPANY  
OF PENNSYLVANIA  
AND  
SENIOR HEALTH INSURANCE COMPANY OF PENNSYLVANIA, IN  
REHABILITATION**  
*Defendant*

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**STIPULATED FACTS SUBMITTED BY PLAINTIFFS<sup>1</sup>**

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1. Prior to filing the Rehabilitation Proceeding SHIP submitted to the Commissioner and LDI all applications for rate increases, policy forms, and policy modifications. SHIP complied with the decisions of the Commissioner and LDI on all such applications.
2. As of the date of this stipulation, according to SHIP's records, 289 SHIP policies are in force in Louisiana including 64 policies already on a non-forfeiture option. The average age of SHIP's Louisiana policyholders is over 86 years.
3. According to SHIP's records, total premiums paid by SHIP's Louisiana policyholders amounted for .72% of SHIP's total premium revenue as of July 31, 2021.
4. Since 2009, the Commissioner and LDI have approved about 96% of total premium increases applied for by SHIP for Louisiana policyholders, a higher percentage than all but eight states.
5. SHIP is insolvent as its reported liabilities exceed its assets. At December 31, 2020, SHIP had total assets of \$1,369,908,000 and total liabilities of \$2,592,415,000 with a deficit (negative capital and surplus) of \$1,222,507,000.

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<sup>1</sup> Capitalized terms have the same meaning as in Plaintiff's Prehearing Memorandum.

6. Each exhibit to the Petition, Plaintiffs' prehearing memorandum, and Exhibits No. 17 and 18 are authentic, although the parties reserve all other objections to admissibility, including relevance and completeness.

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**Attorneys for James J. Donelon, in his official  
capacity as Commissioner of Insurance for the  
State of Louisiana, and The Louisiana  
Department of Insurance**

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing been mailed, postage prepaid or emailed to counsel for the Defendants: Mr. Brandon Black, Suite 800, 445 North Blvd, Baton Rouge, LA 70802 bblack@joneswalker.com; Mr. Covert J. Geary, 201 St. Charles Ave - Suite 5100, New Orleans, LA 70170-5100 cgeary@joneswalker.com; and Mr. Michael J. Broadbent, Cozen O'Connor, One Liberty Place, 1650 Market Street, Suite 2800 Philadelphia, PA 19103 mbroadbent@cozen.com.

Baton Rouge, Louisiana January 18, 2022

/s/ David S. Rubin  
David S. Rubin