

# CANTILO & BENNETT, L.L.P.

ATTORNEYS & COUNSELORS  
*A Texas Registered Limited Liability Partnership  
Comprised of Professional Corporations*

11401 Century Oaks Terrace  
Suite 300

Telephone: (512) 478-6000

Austin, Texas 78758  
www.cb-firm.com

Facsimile: (512) 404-6550

November 30, 2010

## VIA E-FILING

The Honorable Joel H. Peck, Clerk  
State Corporation Commission  
Tyler Building - 1st Floor  
1300 East Main Street  
Richmond, Virginia 23219

ATTN.: DOCUMENT CONTROL CENTER

Re: Commonwealth of Virginia ex rel. State Corporation Commission v. Reciprocal of America and The Reciprocal Group Re: Confidential Settlement Agreement; Case No. INS-2010-00251; Our File No. 65000-105

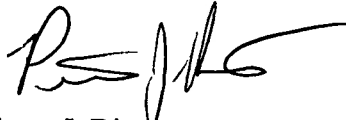
Dear Mr. Peck:

On behalf of Alfred W. Gross, Deputy Receiver of Reciprocal of America and The Reciprocal Group, please find enclosed for e-filing the following:

### **Motion for Protective Order, and Incorporated Memorandum in Support**

Thank you for your kind assistance in regard to this matter. Please let us know if you have any questions.

Respectfully submitted,



Pierre J. Riou  
Counsel to the Deputy Receiver

PJR:dkd

Enclosures

cc: All Parties of Record

COMMONWEALTH OF VIRGINIA  
STATE CORPORATION COMMISSION  
AT RICHMOND

COMMONWEALTH OF VIRGINIA *ex rel.*  
STATE CORPORATION COMMISSION,

Applicant,

v.

CASE NO. INS-2010-00251

RECIPROCAL OF AMERICA and  
THE RECIPROCAL GROUP,

Respondents.

---

Re: Confidential Settlement Agreements

**MOTION FOR PROTECTIVE ORDER, AND  
INCORPORATED MEMORANDUM IN SUPPORT**

Pursuant to 5 VAC 5-20-170, Alfred W. Gross, Commissioner of Insurance, Bureau of Insurance, State Corporation Commission of the Commonwealth of Virginia (the "Commission"), in his capacity as Deputy Receiver of Reciprocal of America and The Reciprocal Group, in receivership (the "Deputy Receiver"), by counsel, submits this motion and memorandum for protective order with respect to confidential agreements effectuating two settlements entered into by the Deputy Receiver (collectively, the "Settlements"). Concurrently with the filing of this motion, the Deputy Receiver is filing his application for the Commission's approval of the Settlements and of the confidential settlement agreements effectuating them (the "Application"). The Settlements, and the confidential settlement agreements effectuating them (collectively, the "Settlement Agreements"), are the following: (a) a confidential mediated settlement among the Deputy Receiver and the plaintiffs in other civil actions pending as part of *In Re Reciprocal of America (ROA) Sales Practices Litigation*, Multidistrict Litigation Docket No. 1551 (W.D. Tenn.) ("MDL-1551"), and

MDL-1551 defendants John William Crews, Gordon D. McLean, Kenneth R. Patterson, Carolyn B. Hudgins, Judith A. Kelley, Richard W. E. Bland, Crews & Hancock, P.L.C., William G. Sugg (“Sugg”) and Gerald R. Wages (“Wages”),<sup>1</sup> as well as Great American Insurance Company, Executive Liability Division, and Great American Insurance Company, Professional Liability Division (the “D&O Settlement”), effectuated by a confidential mediated settlement agreement among those parties (the “D&O Settlement Agreement”);<sup>2</sup> and (b) a settlement of claims between the Deputy Receiver and Ronald K. Davis, M.D. (“Davis”),<sup>3</sup> effectuated by a confidential settlement agreement between them.<sup>4</sup>

Upon the Commission’s application pursuant to VA. CODE ANN. § 38.2-1505, the Circuit Court of the City of Richmond entered its January 29, 2003, Final Order Appointing Receiver for

---

<sup>1</sup> The Deputy Receiver did not assert claims against Sugg or Wages, who were named as defendants by certain other MDL-1551 plaintiffs.

<sup>2</sup> The other MDL-1551 plaintiffs who are parties to the D&O Settlement Agreement are the plaintiffs in MDL-1551 actions *Leslie A. Newman v. General Reinsurance Corporation, et al.*, Civil Action No. 07-CV-1112, W.D. Tenn., *Leslie A. Newman v. General Reinsurance Corporation, et al.*, Civil Action No. 07-CV-1113, W.D. Tenn., *Leslie A. Newman v. General Reinsurance Corporation, et al.*, Civil Action No. 07-CV-1114, W.D. Tenn., *Crenshaw Community Hospital, et al. v. General Reinsurance Corporation, et al.*, Civil Action No. 03-CV-2696, W.D. Tenn., *Gateway Regional Health System, Inc., et al. v. General Reinsurance Corporation, et al.*, Civil Action No. 04-CV-2936, W.D. Tenn., *Delta Regional Medical Center, et al. v. General Reinsurance Corporation, et al.*, Civil Action No. 06-CV-2155, W.D. Tenn., *Appalachian Regional Healthcare, Inc., et al. v. General Reinsurance Corporation, et al.*, Civil Action No. 06-CV-2676, W.D. Tenn., *David Herrick, et al. v. General Reinsurance Corporation, et al.*, Civil Action No. 03-CV-2705, W.D. Tenn., *Schumacher Group, Inc. v. General Reinsurance Corporation, et al.*, Civil Action No. 04-CV-2410, W.D. Tenn., *Christie Clinic, P.C. v. General Reinsurance Corporation, et al.*, Civil Action No. 03-CV-2859, W.D. Tenn., and *Missouri Hospital Plan, et al. v. Doctors Insurance Reciprocal, et al.*, Civil Action No. 04-CV-2294, W.D. Tenn.

<sup>3</sup> The Deputy Receiver is the only MDL-1551 plaintiff who named Davis as a defendant.

<sup>4</sup> Each of the Settlement Agreements includes a confidentiality provision. In addition, because the D&O Settlement was the result of mediation, the confidentiality of that agreement is further protected by VA. CODE ANN. § 8.01-581.22 (“[A] written mediated agreement signed by the parties shall not be confidential, unless the parties otherwise agree in writing. Confidential materials and communications are not subject to disclosure in discovery or in any judicial or administrative proceeding except (i) where all parties to the mediation agree, in writing, to waive the confidentiality.”).

Rehabilitation or Liquidation, providing in relevant part: “The Receiver, Deputy Receiver, and the Special Deputy Receiver shall have the power . . . to institute and to prosecute . . . [and] to compromise suits, legal proceedings or claims on such terms and conditions as the Receiver, Deputy Receiver, or Special Deputy Receiver deems appropriate.” Each of the Settlement Agreements requires, as a condition precedent, that it be approved by final order of the Commission. Because there is no requirement that the Deputy Receiver file the Settlement Agreements, he would, upon request, provide copies of those agreements to the Commission for *in camera* review, and he seeks an order from the Commission protecting their confidentiality. *See* 5 VAC 5-20-170 (“When the information at issue is not required to be filed or made a part of the record, a party who wishes to withhold confidential information from filing or production may move the commission for a protective order without filing the materials. In considering such a motion, the commission may require production of the confidential materials for inspection in camera, if necessary.”). By this motion, the Deputy Receiver seeks an order from the Commission protecting the confidentiality of the Settlement Agreements in the event that the Commission requests to review them *in camera*.

WHEREFORE, the Deputy Receiver respectfully requests that if the Commission reviews the Settlement Agreements *in camera*, for good cause shown herein, the Commission enter a protective order (the “Protective Order”) providing that:

1. The Protective Order governs the Settlement Agreements.
2. The Commission will, and the Commission staff shall, maintain the confidentiality of the Settlement Agreements and shall not disclose either of them, or the terms thereof, to any person who is not a party to it (except to the extent that the parties thereto have consented to disclosure in the Application); and

3. The Commission will retain jurisdiction to enforce the Protective Order.

Respectfully submitted,

Alfred W. Gross, Commissioner of Insurance, State  
Corporation Commission, Bureau of Insurance, as Deputy  
Receiver of Reciprocal of America and The Reciprocal Group

By: s/ Pierre J. Riou  
Pierre J. Riou

Patrick H. Cantilo (*Pro Hac Vice*)  
Pierre J. Riou (*Pro Hac Vice*)  
CANTILO & BENNETT, L.L.P.  
11401 Century Oaks Terrace, Suite 300  
Austin, Texas 78758  
(512) 478-6000  
(512) 404-6550 Fax  
[phcantilo@cb-firm.com](mailto:phcantilo@cb-firm.com)  
[pjriou@cb-firm.com](mailto:pjriou@cb-firm.com)  
[service@cb-firm.com](mailto:service@cb-firm.com)

## CERTIFICATE OF SERVICE

I hereby certify that on November 30, 2010, the foregoing document was filed electronically with the Clerk of the Commission and one copy was sent via overnight delivery to:

Donald C. Beatty, Senior Counsel  
Office of General Counsel  
STATE CORPORATION COMMISSION  
1300 E. Main Street  
P.O. Box 1197  
Richmond, Virginia 23218

Mike R. Parker, Special Deputy Receiver  
c/o Reciprocal of America & The Reciprocal Group  
4200 Innslake Drive  
Glen Allen, Virginia 23060  
(804) 965-1278  
(804) 965-1346 Fax

and one copy was sent via e-mail and/or regular U.S. mail to:

H. Lane Kneedler, Esq.  
Walter A. Marston, Jr., Esq.  
Curtis G. Manchester, Esq.  
REED SMITH LLP  
Riverfront Plaza - West Tower  
901 East Byrd Street, Suite 1700  
Richmond, Virginia 23219-4068  
(804) 344-3485  
(804) 344-3410 Fax  
[lkneedler@reedsmith.com](mailto:lkneedler@reedsmith.com)  
[wmarston@reedsmith.com](mailto:wmarston@reedsmith.com)  
[cmanchester@reedsmith.com](mailto:cmanchester@reedsmith.com)

Counsel for Jeanne Barnes Bryant, Special Deputy Receiver for Doctors Insurance Reciprocal, RRG, Robert S. Brandt, Special Deputy Receiver for American National Lawyers Insurance Reciprocal, RRG, and Michael D. Pearigen, Special Deputy Receiver for The Reciprocal Alliance, RRG

J. Graham Matherne, Esq.  
William Gibson, Esq.  
WYATT, TARRANT & COMBS, LLP  
2525 West End Avenue, Suite 1500  
Nashville, Tennessee 37203-1423  
(615) 251-6708  
(615) 256-1726 Fax  
[gmatherne@wyattfirm.com](mailto:gmatherne@wyattfirm.com)  
[bgibson@wyattfirm.com](mailto:bgibson@wyattfirm.com)  
Of Counsel for Jeanne Barnes Bryant, Special Deputy Receiver for Doctors Insurance Reciprocal, RRG

Kathryn A. Stephenson, Esq.  
Paul W. Ambrosius, Esq.  
TRAUGER & TUKE  
The Southern Turf Building  
222 Fourth Avenue North  
Nashville, Tennessee 37219-2117  
(615) 256-8585  
(615) 256-7444 Fax  
[kstephenson@tntlaw.net](mailto:kstephenson@tntlaw.net)  
[pambrosius@tntlaw.net](mailto:pambrosius@tntlaw.net)  
Of Counsel for Robert S. Brandt, Special Deputy Receiver for American National Lawyers Insurance Reciprocal, RRG

J. W. Luna, Esq.  
FARMER & LUNA, PLLC  
333 Union Street, Suite 300  
Nashville, Tennessee 37201  
(615) 254-9146  
(615) 254-7123 Fax  
[jwluna@farmerluna.com](mailto:jwluna@farmerluna.com)  
Of Counsel for Michael D. Pearigen, Special Deputy Receiver for The Reciprocal Alliance, RRG

Steven G. Friedman, Esq.  
2421 Ivy Road  
Charlottesville, Virginia 22903  
(434) 249-6477  
(434) 817-6570 Fax  
[sfriedman@nlrg.com](mailto:sfriedman@nlrg.com)  
Counsel for Tennessee Hospital Association and Virginia Health and Hospital Association

William B. Hubbard, Esq.  
Robyn E. Smith, Esq.  
HUBBARD, BERRY & HARRIS, PLLC  
201 Fourth Avenue North, Suite 1420  
Nashville, Tennessee 37219  
(615) 251-5444  
(615) 251-5453 Fax  
[whubbard@hubbardberry.com](mailto:whubbard@hubbardberry.com)  
[rsmith@hubbardberry.com](mailto:rsmith@hubbardberry.com)  
Counsel for Tennessee Hospital Association and Virginia Health and Hospital Association

Michelle J. Long, Esq.  
Senior Vice President/General Counsel  
Tennessee Hospital Association  
500 Interstate Boulevard South  
Nashville, Tennessee 37210  
(615) 256-8240  
(615) 242-4803 Fax  
[mlong@tha.com](mailto:mlong@tha.com)

Wiley F. Mitchell, Jr., Esq.  
Ross C. Reeves, Esq.  
Michael R. Katchmark, Esq.  
WILLCOX & SAVAGE, P.C.  
One Commercial Place, Suite 1800  
Norfolk, Virginia 23510  
(757) 628-5500  
(757) 628-5566 Fax  
[wmitchell@wilsav.com](mailto:wmitchell@wilsav.com)  
[rreeves@wilsav.com](mailto:rreeves@wilsav.com)  
[mkatchmark@wilsav.com](mailto:mkatchmark@wilsav.com)  
Counsel for Coastal Region Board of Directors and Alabama Subscribers



Greg E. Mitchell, Esq.  
R. Keith Moorman, Esq.  
Jan deBeer, Esq.  
J. Bradford Derifield, Esq.  
FROST BROWN TODD LLC  
250 West Main Street, Suite 2800  
Lexington, Kentucky 40507-1749  
(859) 231-0000  
(859) 231-0011 Fax  
[gmitchell@fbtlaw.com](mailto:gmitchell@fbtlaw.com)  
[rmoorman@fbtlaw.com](mailto:rmoorman@fbtlaw.com)  
[jdebeer@fbtlaw.com](mailto:jdebeer@fbtlaw.com)  
[jderifield@fbtlaw.com](mailto:jderifield@fbtlaw.com)

Counsel for Kentucky Claimants, Coverage Option Associates, Kentucky Hospital Association, Lisa Hyman, and Trover Clinic Foundation

William C. Gullett, Esq.  
FROST BROWN TODD, LLC  
424 Church Street, Suite 1600  
Nashville, Tennessee 37219-2308  
(615) 251-5576  
(615) 251-5551 Fax  
[wgullett@fbtlaw.com](mailto:wgullett@fbtlaw.com)  
Counsel for Kentucky Claimants

Matthew W. Grill, Esq.  
MAYNARD COOPER & GALE, PC  
2400 Regions/Harbert Plaza  
1901 Sixth Avenue North  
Birmingham, Alabama 35203-2602  
(205) 254-1000  
(205) 254-1999 Fax  
[mgrill@maynardcooper.com](mailto:mgrill@maynardcooper.com)  
Counsel for Baptist Health System, Inc.

Peter J. Barrett, Esq.  
Michael A. Condyles, Esq.  
KUTAK ROCK LLP  
Bank of America Center  
1111 E. Main Street, Suite 800  
Richmond, Virginia 23219  
(804) 644-1700  
(804) 783-6192 Fax  
[peter.barrett@kutakrock.com](mailto:peter.barrett@kutakrock.com)  
[michael.condyles@kutakrock.com](mailto:michael.condyles@kutakrock.com)  
Counsel for Baptist Health System, Inc.

W. H. Albritton, IV, Esq.  
John K. Molen, Esq.  
BRADLEY ARANT ROSE & WHITE LLP  
One Federal Place  
1819 Fifth Avenue North  
Birmingham, Alabama 35203  
(205) 521-8000  
(205) 521-8800 Fax  
[halbritton@bradleyarant.com](mailto:halbritton@bradleyarant.com)  
[jmolen@bradleyarant.com](mailto:jmolen@bradleyarant.com)  
Counsel for The Children's Hospital of Alabama

Michael E. Harman, Esq.  
Mark G. Carlton, Esq.  
HARMAN, CLAYTOR, CORRIGAN & WELLMAN, P.C.  
Innsbrook Corporate Center  
4951 Lake Brook Drive, Suite 100  
Glen Allen, Virginia 23060-9272  
P.O. Box 70280  
Richmond, Virginia 23255  
(804) 747-5200  
(804) 747-6085 Fax  
[mharman@hccw.com](mailto:mharman@hccw.com)  
[mcarlton@hccw.com](mailto:mcarlton@hccw.com)  
Counsel for The Children's Hospital of Alabama

Philip B. Morris, Esq.  
MORRIS & MORRIS, P.C.  
700 E. Main Street, Suite 1100 (23219)  
P. O. Box 30  
Richmond, Virginia 23218-0030  
(804) 344-8300  
(804) 344-8359 Fax  
[pmorris@morrismorris.com](mailto:pmorris@morrismorris.com)  
Counsel for PhyAmerica Physician Group, Inc.

Louis E. Dolan, Jr., Esq.  
NIXON PEABODY, LLP  
401 9th Street, N.W., Suite 900  
Washington, D.C. 20004-2128  
(202) 585-8000  
(202) 585-8080 Fax  
[ldolan@nixonpeabody.com](mailto:ldolan@nixonpeabody.com)  
Counsel for Tennessee Insurance Guaranty Assn., Alabama Insurance Guaranty Assn., District of Columbia Insurance Guaranty Assn., Georgia Insurers Insolvency Pool, Indiana Insurance Guaranty Assn., Maryland Property & Casualty Insurance Guaranty Assn., Louisiana Insurance Guaranty Assn., Mississippi Insurance Guaranty Assn., Kansas Insurance Guaranty Assn., Missouri Property & Casualty Insurance Guaranty Assn., North Carolina Insurance Guaranty Assn.

Joseph C. Tanski, Esq.  
Gregory P. Deschenes, Esq.  
Maia H. Harris, Esq.  
NIXON PEABODY, LLP  
100 Summer Street  
Boston, Massachusetts 02110  
(617) 345-1000  
(617) 345-1300 Fax  
[jtanski@nixonpeabody.com](mailto:jtanski@nixonpeabody.com)  
[gdeschenes@nixonpeabody.com](mailto:gdeschenes@nixonpeabody.com)  
[mharris@nixonpeabody.com](mailto:mharris@nixonpeabody.com)  
Counsel for Tennessee Insurance Guaranty Assn., Alabama Insurance Guaranty Assn., District of Columbia Insurance Guaranty Assn., Georgia Insurers Insolvency Pool, Indiana Insurance Guaranty Assn., Maryland Property & Casualty Insurance Guaranty Assn., Louisiana Insurance Guaranty Assn., Mississippi Insurance Guaranty Assn., Kansas Insurance Guaranty Assn., Missouri Property & Casualty Insurance Guaranty Assn.

C. Cotesworth Pinckney, Esq.  
Andrew G. Mauck, Esq.  
Kevin Mottley, Esq.  
TROUTMAN SANDERS LLP  
1001 Haxall Point (23219)  
P.O. Box 1122  
Richmond, Virginia 23218-1122  
(804) 697-1200  
(804) 697-1339 Fax  
[cotes.pinckney@troutmansanders.com](mailto:cotes.pinckney@troutmansanders.com)  
[andrew.mauck@troutmansanders.com](mailto:andrew.mauck@troutmansanders.com)  
[kevin.mottley@troutmansanders.com](mailto:kevin.mottley@troutmansanders.com)  
Counsel for Virginia Property and Casualty Insurance Guaranty Association

Charles F. Midkiff, Esq.  
MIDKIFF, MUNCIE & ROSS, P.C.  
9030 Stony Point Parkway, Suite 160  
Richmond, Virginia 23235  
(804) 560-9600  
(804) 560-5997 Fax  
[cmidkiff@midkiffllaw.com](mailto:cmidkiff@midkiffllaw.com)  
Counsel for Virginia Workers' Compensation

Ms. Manju S. Ganeriwala  
Treasurer of the Commonwealth of Virginia  
101 N. 14th Street  
Richmond, Virginia 23219  
(804) 225-2142  
(804) 225-3187 Fax  
[kathi.scearce@trs.virginia.gov](mailto:kathi.scearce@trs.virginia.gov)

Peter J. Enko, Esq.  
HUSCH BLACKWELL SANDERS LLP  
4801 Main Street, Suite 1000  
Kansas City, Missouri 64112  
(816) 983-8000  
(816) 983-8080 Fax  
[peter.enko@huschblackwell.com](mailto:peter.enko@huschblackwell.com)  
Counsel for Saint Luke's Hospital

Ben R. Lacy, IV, Esq.  
John B. Catlett, Jr., Esq.  
SANDS ANDERSON MARKS & MILLER, P.C.  
801 E. Main Street, Suite 1800 (23219)  
P.O. Box 1998  
Richmond, Virginia 23218  
(804) 648-1636  
(804) 783-7291 Fax  
[Blacy@SandsAnderson.com](mailto:Blacy@SandsAnderson.com)  
[Jcatlett@SandsAnderson.com](mailto:Jcatlett@SandsAnderson.com)  
Counsel for Donna D. Lange, Tennessee Insurance Guaranty Association, and Mississippi Insurance Guaranty Association

J. Jonathan Schraub, Esq.  
SANDS ANDERSON MARKS & MILLER  
1497 Chain Bridge Road, Suite 202  
McLean, Virginia 22101  
(703) 893-3600  
(703) 893-8484 Fax  
[jjschraub@sandsanderson.com](mailto:jjschraub@sandsanderson.com)  
Counsel for Tennessee Insurance Guaranty Association

Charles F. Witthoefft, Esq.  
HIRSCHLER FLEISCHER, P.C.  
The Edgeworth Building  
2100 E. Cary Street  
Richmond, Virginia 23223-7078  
(804) 771-9562  
(804) 644-0957 Fax  
[rwitthoefft@hf-law.com](mailto:rwitthoefft@hf-law.com)  
Counsel for Kenneth R. Patterson

Jack W. Burtch, Jr., Esq.  
MACAULEY & BURTCH, P.C.  
1015 E. Main Street  
Richmond, Virginia 23219  
(804) 649-1543  
(804) 649-0986 Fax  
[jb@macbur.com](mailto:jb@macbur.com)  
Counsel for Judith A. Kelley

Dion Hayes, Esq.  
R. Gordon Smith, Esq.  
H. C. Redd, Esq.  
MCGUIREWOODS LLP  
One James Center  
901 E. Cary Street  
Richmond, Virginia 23219  
(804) 775-1000  
(804) 775-1061 Fax  
[dhayes@mcguirewoods.com](mailto:dhayes@mcguirewoods.com)  
[gsmith@mcguirewoods.com](mailto:gsmith@mcguirewoods.com)  
[credd@mcguirewoods.com](mailto:credd@mcguirewoods.com)

Counsel for Malcolm L. Butterfield and Michael W. Morrison as Joint Liquidators of First Virginia Reinsurance, Ltd.

Douglas M. Palais, Esq.  
LECLAIR RYAN, P.C.  
951 East Byrd Street, East Tower (23218)  
P.O. Box 2499  
Richmond, Virginia 23218-2499  
(804) 783-2003  
(804) 916-7242 Fax  
[douglas.palais@leclairryan.com](mailto:douglas.palais@leclairryan.com)  
Counsel for Richard W.E. Bland

Eric M. Page, Esq.  
LECLAIR RYAN, P.C.  
4201 Dominion Boulevard, Suite 200  
Glen Allen, Virginia 23060  
(804) 270-0070  
(804) 527-1753 Fax  
[epage@leclairryan.com](mailto:epage@leclairryan.com)  
Counsel for Richard W.E. Bland

William D. Leader, Jr., Esq.  
Julie M. Burnstein, Esq.  
LEADER, BULSO, NOLAN  
& BURNSTEIN, PLC  
Bank of America Plaza  
414 Union Street, Suite 1740  
Nashville, Tennessee 37219  
(615) 780-4100  
(615) 780-4101 Fax  
[bleader@leaderbulso.com](mailto:bleader@leaderbulso.com)  
[jburnstein@leaderbulso.com](mailto:jburnstein@leaderbulso.com)  
Counsel for Tennessee Insurance Guaranty Association

Christopher J. Blake, Esq.  
Joseph W. Eason, Esq.  
NELSON MULLINS RILEY & SCARBOROUGH, LLP  
4140 Parklake Avenue, Suite 200  
Raleigh, North Carolina 27612  
(919) 877-3800  
(919) 877-3799 Fax  
[chris.blake@nmrs.com](mailto:chris.blake@nmrs.com)  
[joe.eason@nmrs.com](mailto:joe.eason@nmrs.com)  
Counsel for North Carolina Insurance Guaranty Association

Phyllis L. Robinson, Esq.  
Attorney at Law  
P.O. Box 130  
Manchester, Kentucky 40962  
(606) 599-0299  
(606) 599-1909 Fax  
Counsel for Jerry Wells and Janet Sizemore

Mariann Morgan, Esq.  
CHECKETT & PAULY, P.C.  
517 S. Main Street  
P.O. Box 409  
Carthage, Missouri 64836  
(417) 358-4049  
(417) 358-6341 Fax  
Counsel for Michelle Vance, Linda Kay Moore, and Sunny Albergucci

Ms. Carolyn D. Harvey  
115 Moorman Drive  
Madison Heights, Virginia 24572  
Petitioner

Ms. Virginia R. Walker  
88 Benny Lane  
Lawrenceville, Virginia 23868  
Petitioner

Ms. Mary E. Williams  
1003 Fairfield Avenue  
Grenada, Mississippi 38901  
Petitioner

Lewis F. Powell III, Esq.  
HUNTON & WILLIAMS LLP  
Riverfront Plaza, East Tower  
951 East Byrd Street  
Richmond, Virginia 23219-4074  
(804) 788-8484  
(804) 788-8218 Fax  
[lpowell@hunton.com](mailto:lpowell@hunton.com)  
Counsel for General Reinsurance Corporation

Edmund L. Brunini, Jr., Esq.  
Jonathan R. Werne, Esq.  
BRUNINI, GRANTHAM, GROWER & HEWES, PLLC  
190 East Capitol Street, Suite 100 (39201)  
Post Office Drawer 119  
Jackson, Mississippi 39205  
(601) 948-3101  
(601) 960-6902 Fax  
[ebrunini@brunini.com](mailto:ebrunini@brunini.com)  
[jwerne@brunini.com](mailto:jwerne@brunini.com)  
Counsel for St. Dominic Health Services, Inc.



M. Todd Gerber, Esq.  
HUFF, POOLE & MAHONEY, P.C.  
4705 Columbus Street  
Virginia Beach, Virginia 23462-6749  
(757) 552-6060  
(757) 552-6016 Fax  
[tgerber@hpmlaw.com](mailto:tgerber@hpmlaw.com)  
Counsel for Sentara Healthcare

Kevin M. O'Donnell, Esq.  
Jeffery T. Martin, Jr., Esq.  
HENRY & O'DONNELL, P.C.  
4103 Chain Bridge Road, Suite 100  
Fairfax, Virginia 22030  
(703) 273-1900  
(703) 273-6884 Fax  
[kmo@henrylaw.com](mailto:kmo@henrylaw.com)  
[jtm@henrylaw.com](mailto:jtm@henrylaw.com)  
Counsel for Amerisist Management Company, L.L.C.

Ms. Cathy A. Stearns  
Corporate Claims Manager  
North Mississippi Health Services  
830 South Gloster Street  
Tupelo, Mississippi 38801  
(662) 377-3140

Nathan Veldhuis, Esq.  
TREMBLAY & SMITH, LLP  
105-109 East High Street  
Charlottesville, Virginia 22902  
(434) 977-4455  
(434) 979-1221 Fax  
Counsel for the Petitioner James Howard, Administrator of the Estate of Sandra Elizabeth Jones

s/ Pierre J. Riou  
\_\_\_\_\_  
Pierre J. Riou