

Exhibit A

IN THE SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

OMMEN, et al
Plaintiff

Case Number: 19-0005151

vs

RSM US LLP, et al
Defendant

AFFIDAVIT OF
SERVICE

Now comes, Nina Lew the undersigned and does hereby swear and affirm, affiant is a Private Process Server and disinterested Person over the age of eighteen. Affiant is not a party in the above styled cause and has a legal domicile of Silver Spring, MD.

I, Nina Lew certify that on, **8/8/2019**, at **1:53 PM**, I served a copy of the within **(DC) Subpoena For A Civil Case, (IA) Subpoena To Produce Books, Documents, Electronically Stored Information, Or Tangible Things and Schedule A** upon the within named **U.S. Centers for Medicare and Medicaid Services**, in the following manner,

(xx) Corporate/Partnership Service: Through Personal Service of each document, a true copy to **Kristen Roberts , Administrator**, whom based on information and belief affiant knew said individual to be Authorized Agent, a person authorized to accept service on behalf of **U.S. Centers for Medicare and Medicaid Services**.

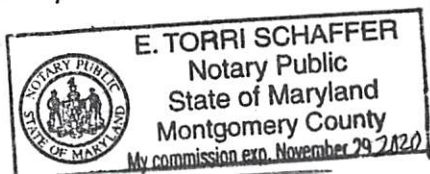
Said service was effected at the following location: **200 Independence Avenue, S.W., Washington, DC 20201**.

I, Nina Lew describe the individual accepting service **Kristen Roberts** as follows: **Kristen Roberts** is a White Female, approximately 40 yrs. old, with Blonde hair, approximately 5'6" and weighing 140 lbs.

I, Nina Lew certify that my statements, contained within the foregoing affidavit are true, correct and my free act and deed. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Sworn to and subscribed before me on
08/09/2019


E. Torri Schaffer, Notary Public
Commission Expires 11/29/2020



45711



Nina Lew
P.O. Box 18647
Washington, DC 20036
202-296-0222

SUBPOENA

**Superior Court of the District of Columbia
CIVIL DIVISION**

Check One:

- | | | |
|--|--|--|
| <input checked="" type="checkbox"/> Civil Actions Branch
500 Indiana Ave., N.W.
Room 5000
Washington, D.C. 20001
Telephone: (202) 879-1133 | <input type="checkbox"/> Landlord & Tenant Branch
510 4 th Street, N.W.
Room 110
Washington, D.C. 20001
Telephone: (202) 879-4879 | <input type="checkbox"/> Small Claims & Conciliation Branch
510 4 th Street, N.W.
Room 120
Washington, D.C. 20001
Telephone: (202) 879-1120 |
|--|--|--|

Ommen, et al.

Plaintiff

SUBPOENA FOR A CIVIL CASE

v.
RSM US LLP, et al.

Defendant

CASE NUMBER: **19 - 0005151**

To: U.S. Centers for Medicare and Medicaid Services
200 Independence Ave. SW, Washington, D.C. 20201

Check box if medical records are being requested

YOU ARE COMMANDED to appear in this Court at the place, date, and time specified below to testify in the above case.

COURTROOM AND ADDRESS	DATE	TIME

YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION	DATE	TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition must designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which each person will testify. Super. Ct. Civ. R. 30(b)(6).

YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):

DOCUMENTS OR OBJECTS	DATE	TIME
See Attached Subpoena & Schedule A.		
PLACE OF PRODUCTION	DATE	TIME
Williams & Connolly LLP, 725 Twelfth Street NW, Washington, DC 20005	September 5, 2019	12:00 PM

YOU ARE COMMANDED to permit inspection of the following premises at the date, and time specified below.

PREMISES	DATE	TIME

ISSUING PERSON'S SIGNATURE AND TITLE (indicate if attorney for plaintiff or defendant) Counsel for Defendants Deputy Clerk	DATE August 6, 2019
ISSUING PERSON'S NAME, ADDRESS AND PHONE NUMBER 500 Indiana Avenue NW Rm 5000 DC 20001 Matthew D. Heins, Williams & Connolly LLP, 725 Twelfth Street NW, Washington, DC 20005, Tel: 202-434-5073	

Authorization as required by D.C. Code §14-307 and Brown v. U.S., 567 A.2d 426 (D.C. 1989), is hereby given for issuance of a subpoena for medical records concerning a person who has not consented to disclosure of the records and has not waived the privilege related to such records.

JUDGE

Case Number: **19-0005151**

Court Date: _____

PROOF OF SERVICE

Served	Date	Time	Place
--------	------	------	-------

Served on (Print Name)	Title
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MANNER OF SERVICE (attach the return receipt if service was made by registered or certified mail) I served the subpoena by delivering a copy to the named person as follows:

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the District of Columbia that I am at least 18 years of age and not a party to the above entitled case and that the foregoing information contained in the Proof of Service is true and correct.

Executed on _____
Date

Signature of Server

Address of Server

Super. Ct. Civ. R. 45(c) and (d):

(c) PROTECTING A PERSON SUBJECT TO A SUBPOENA; ENFORCEMENT.

(1) *Avoiding Undue Burden or Expense; Sanctions.* A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney’s fees—on a party or attorney who fails to comply.

(2) *Command to Produce Materials or Permit Inspection.*

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents, electronically stored information, or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If objection is made, the following rules apply:

(i) At any time, on notice to the commanded person, the serving party may move the court for an order compelling production or inspection.

(ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party’s officer from significant expense resulting from compliance.

(3) *Quashing or Modifying a Subpoena.*

(A) *When Required.* On timely motion, the court must quash or modify a subpoena that:

(i) fails to allow reasonable time to comply;

(ii) requires a person who is neither a party nor a party’s officer to travel more than 25 miles from where that person resides, is employed, or regularly transacts business in person—except that, subject to Rule 45(c)(3)(B)(iii), the person may be commanded to attend a trial by traveling from any such place to the place of trial;

(iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or

(iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court may, on motion, quash or modify the subpoena if it requires:

(i) disclosing a trade secret or other confidential research, development, or commercial information;

(ii) disclosing an unretained expert’s opinion or information that does not describe specific occurrences in dispute and results from the expert’s study that was not requested by a party; or

(iii) a person who is neither a party nor a party’s officer to incur substantial expense to travel more than 25 miles to attend trial.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(c)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

(i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and

(ii) ensures that the subpoenaed person will be reasonably compensated.

(d) DUTIES IN RESPONDING TO A SUBPOENA.

(1) *Producing Documents or Electronically Stored Information.* These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) *Claiming Privilege or Protection.*

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation materials must:

(i) expressly make the claim; and

(ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and must promptly present the information under seal to the court for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

IN THE IOWA DISTRICT COURT FOR POLK COUNTY

<p>DOUG OMMEN, <i>in his capacity as Liquidator of CoOpportunity Health</i>, and DAN WATKINS, <i>in his capacity as Special Deputy Liquidator of CoOpportunity Health</i>,</p> <p>Plaintiffs,</p> <p>vs.</p> <p>RSM US LLP, FRED FISCHER and MARK TOMAW,</p> <p>Defendants.</p>	<p>CASE NO.: LACL142448</p> <p>SUBPOENA TO PRODUCE BOOKS, DOCUMENTS, ELECTRONICALLY STORED INFORMATION, OR TANGIBLE THINGS</p>
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To: **United States Centers for Medicare and Medicaid Services**,
U.S. Department of Health and Human Services, Office of the General Counsel,
200 Independence Ave. S.W., Washington, D.C. 20201

Pursuant to Iowa Rule of Civil Procedure 1.1701, you are commanded to produce at the time, date, and place specified below the books, documents, electronically stored information, and tangible things identified in **Schedule A (attached)** and to permit their inspection, copying, testing, or sampling.

Place: Williams & Connolly LLP, Attn: Matthew D. Heins
725 Twelfth Street NW
Washington, DC 20005

Date: September 5, 2019

Time: 12:00 PM

Electronically stored information shall be produced in single page TIFF format, with the exception of non-redacted spreadsheets (e.g., Microsoft Excel files) and presentations (e.g., Microsoft Powerpoint files), which shall be produced in native format in accordance with the instructions set forth in **Schedule A (attached)**.

In accordance with Rule 1.701(1)(a)(4), Rules 1.701(4) and 1.701(5) are set out in full below:

Iowa Rules of Civil Procedure 1.1701(4) and 1.1701(5)

1.1701(4) Protecting a person subject to a subpoena.

a. Avoiding undue burden or expense; sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The issuing court must enforce this duty and impose an appropriate sanction, which may include lost earnings and reasonable attorney's fees, on a party or attorney who fails to comply.

b. Command to produce materials or permit inspection.

(1) *Appearance not required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(2) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing or sampling any or all of the materials or to inspecting the premises, or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

1. At any time, on notice to the commanded person, the serving party may move the issuing court for an order compelling production or inspection.
2. These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

c. Attendance. Any party shall be permitted to attend at the same time and place and for the same purposes specified in the subpoena. No prior notice of intent to attend is required.

d. Quashing or modifying a subpoena.

(1) *When required.* On timely motion, the issuing court must quash or modify a subpoena that:

1. fails to allow a reasonable time to comply;
2. requires a person who is neither a party nor a party's officer to travel more than 50 miles from where that person resides, is employed, or regularly transacts business in person, except that a person may be ordered to attend trial anywhere within the state in which the person is served with a subpoena;
3. requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
4. subjects a person to undue burden.

(2) *When permitted.* To protect a person subject to or affected by a subpoena, the issuing court may, on motion, quash or modify the subpoena if it requires:

1. disclosing a trade secret or other confidential research, development, or commercial information; or
2. disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.
3. a person who is neither a party nor a party's officer to incur substantial expense to travel more than 50 miles to attend trial.

(3) *Specifying conditions as an alternative.* In the circumstances described in rule 1.1701(4)(d)(2), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

1. shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
2. ensures that the subpoenaed person will be reasonably compensated.

1.1701(5) Duties in responding to a subpoena.

a. Producing documents or electronically stored information. These procedures apply to producing documents or electronically stored information:

(1) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(2) *Form for producing electronically stored information not specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(3) *Electronically stored information produced in only one form.* The person responding need not produce the same electronically stored information in more than one form.

(4) *Inaccessible electronically stored information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of rule 1.504(1)(b). The court may specify conditions for the discovery.

b. Claiming privilege or protection.

(1) *Information withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

1. expressly make the claim; and
2. describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(2) *Information produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information to the court under seal for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

Dated: August 6, 2019

/s/ Michael C. Richards
Michael C. Richards, AT0010828
DAVIS, BROWN, KOEHN, SHORS
& ROBERTS, P.C.
215 10th Street, Suite 1300
Des Moines, Iowa 50309
Telephone: (515) 288-2500
Facsimile: (515) 243-0654
Email: GeneLaSuer@davisbrownlaw.com
MikeRichards@davisbrownlaw.com

Thomas H.L. Selby (admitted *pro hac vice*)
Katherine M. Turner (admitted *pro hac vice*)
Jessica L. Pahl (admitted *pro hac vice*)
Matthew D. Heins (admitted *pro hac vice*)
WILLIAMS & CONNOLLY LLP
725 Twelfth Street N.W.
Washington, D.C. 20005
Telephone: (202) 434-5000
Facsimile: (202) 434-5029
Email: tselby@wc.com
kturner@wc.com
jl_pahl@wc.com
mheins@wc.com

ATTORNEYS FOR DEFENDANTS

PROOF OF SERVICE

This subpoena for *(name of individual and title, if any)* _____
was received by me on *(date)* _____.

- I personally served the subpoena on the individual at *(place)* _____
_____ on *(date)* _____; or
- I left the subpoena at the individual's dwelling house or usual place of abode with *(name)* _____
_____, a person residing therein who is at least 18 years old; or
- I served the subpoena on *(name of individual)* _____, who is
designated by law to accept service of process on behalf of *(name of organization)* _____
_____ on *(date)* _____; or
- I returned the subpoena unexecuted because _____; or
- Other *(specify)*:

WITNESS FEES

- No witness fee requested or required under Iowa Code section 622.74.
- I have tendered to the witness fees for one day's attendance in the amount of \$ _____ and the
mileage allowed by law in the amount of \$ _____, for a total of \$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a genuine copy of the foregoing document was served upon the persons
named below and at the address indicated on the ___ day of _____, 20__ by the following method _____
_____;

Name and address of party or attorney: _____

Signature of server

Copies to:

Kevin J. Driscoll
John David Hilmes
Finley Law Firm P.C.
699 Walnut Street, Suite 1700
Des Moines, IA 50309
Email: kdriscoll@finleylaw.com
jhilmes@finleylaw.com

Douglas J. Schmidt
Kirsten A. Byrd
Husch Blackwell LLP
4801 Main Street, Suite 1000
Kansas City, MO 64112
Email: douglas.schmidt@huschblackwell.com
kirsten.byrd@huschblackwell.com

David W. Sobelman
Melissa Baris
Husch Blackwell LLP
190 Carondelet Plaza, Suite 600
St. Louis, MO 63105
Email: David.Sobelman@huschblackwell.com
Email: Melissa.Baris@huschblackwell.com

ATTORNEYS FOR PLAINTIFFS

PROOF OF SERVICE

The undersigned certifies that the foregoing instrument was served upon all parties to the above cause to each of the attorneys of record herein at their respective addresses disclosed on the pleadings on **August 6, 2019**, by:

U.S. Mail FAX
 Hand Delivered Overnight Courier
 Federal Express Other: Email

Signature: /s/ Michael C. Richards

SCHEDULE A

DEFINITIONS

1. The term “ACA” shall mean the federal Patient Protection and Affordable Care Act, Pub. L. 111-148, 124 Stat. 119 *et seq.* (2010), and the regulations enacted thereunder.

2. The term “all” shall be construed to include the term “each” or “any,” and vice versa.

3. The terms “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the Subpoena all responses that might otherwise be construed to be outside the scope of the Subpoena.

4. The terms “CMS,” “You” and “Your” shall mean the United States Centers for Medicare and Medicaid Services and any employee, agent, or representative of same, including, but not limited to, Michael Adelberg, Kevin Counihan, Patricia Beckman, Kelly O’Brien, Beth Liu, Chanda McNeal, Laura Byabazaire, Joan Peterson, and Peggy Delfuco.

5. The term “communication” shall mean the transmittal of words, data, or information by any medium.

6. The terms “concern” or “concerning” shall mean reflecting, referring to, relating to, describing, evidencing, or constituting.

7. The term “CoOpportunity” shall mean CoOpportunity Health, Inc., f/k/a Midwest Members Health, and any current or former founders, directors, officers, employees, attorneys, or other agents of CoOpportunity Health, Inc., including, but not limited to, Stephen Ringlee, Clifford Gold, David Lyons, Brad Edmister, Scott Geistkemper, and Molly Timlin.

8. The term “document” shall be construed as broadly as Rule 1.503 of the Iowa Rules of Civil Procedure permits and shall include, without limitation, communications, papers,

Schedule A
Page 2 of 7

photographs, films, recordings, memoranda, books, records, accounts, and electronically stored information. The term “document” shall include not only originals but also any drafts, copies, reproductions, and portions of any document.

9. The term “IID” shall mean the Iowa Insurance Division, any person or entity acting on behalf of the Iowa Insurance Division, and any employee or other agent of the Iowa Insurance Division, including, but not limited to, Nick Gerhart (including in his capacity as Iowa Commissioner of Insurance and/or as the rehabilitator or liquidator of CoOpportunity) and Jim Armstrong.

10. The terms “include” and “including” shall mean including without limitation.

11. The term “Liquidators” shall mean Nick Gerhart, Dan Watkins and/or Doug Ommen, in their capacities as liquidator or special deputy liquidator of CoOpportunity, or anyone acting or purporting to act on their behalf.

12. The term “Milliman” shall mean Milliman, Inc., as well as each of its current and former employees, directors, officers, partners, agents, representatives, administrators, trustees, and anyone acting or purporting to act on Milliman’s behalf, including, but not limited to, Kimberly Heimenz and Michael Sturm.

13. The term “NDI” shall mean the Nebraska Department of Insurance, any person or entity acting on its behalf, and any employee or other agent of the Nebraska Department of Insurance.

14. The term “person” shall mean any natural person or any business, corporation, partnership, proprietorship, association, organization, governmental entity, group, or other entity.

15. The term “Request” refers to each of the numbered paragraphs in the Documents Requested section of the Subpoena.

Schedule A
Page 3 of 7

16. The term “RSM” shall mean RSM US LLP (f/k/a McGladrey LLP), as well as RSM US LLP’s current and former partners, officers, directors, employees, agents, attorneys, and representatives, including, but not limited to, Fred Fischer, Mark Tomaw, Joe Lee, and Arjun Patel.

17. The term “Solvency Loan” shall mean the Series B loan CMS issued to CoOpportunity in 2012, memorialized in the loan document attached here as Exhibit 1.

18. The term “Subpoena” means this request for production of documents, each of the individual paragraphs of the Documents Requested section herein, and the subpoena served pursuant to Rule 1.701 of the Iowa Rules of Civil Procedure to which this request is attached.

INSTRUCTIONS

1. Produce all responsive documents within your possession, custody, and control, regardless of whether such documents are held by any other person or entity under your control, including, but not limited to, your attorneys and representatives.

2. Pursuant to Rule 1.1701(5) of the Iowa Rules of Civil Procedure, if you claim any privilege as a basis for withholding any otherwise responsive document or portion thereof, please expressly make the claim and describe the nature of the withheld document in a manner that, without revealing information itself privileged or protected, will allow the parties to assess the claim.

3. If any portion of a document is withheld pursuant to a claim of privilege or protection from disclosure, that portion of the document or image shall be marked with the word “REDACTED” to indicate the location of the withheld information.

4. If you find any Request or portion thereof to be vague, ambiguous, subject to varying interpretations, or unclear, state what portion of the Request or term you find to be vague, ambiguous, subject to varying interpretations, or unclear; state your understanding of the Request

Schedule A
Page 4 of 7

or term; and respond in accordance with that understanding.

5. Pursuant to Rules 1.1701(1)(c) of the Iowa Rules of Civil Procedure, electronically stored information responsive to these Requests should be produced as single page TIFF image files, in an electronic format, and accompanied by an IPRO Image .LFP load file (or other generally acceptable load file format, such as Concordance Image .OPT or Summation .DII files). Microsoft Excel and PowerPoint files should be produced in their native format. The fully extracted text (or, where not available, an accompanying OCR file) should be included and produced at a document level named by the first Bates of the document. Metadata shall also be produced, in the Concordance DAT file format (with the Concordance default delimiters) or other generally acceptable format. The DAT file or other format should include, at a minimum, the following metadata fields: Prodbeg, Prodend, ProdBegattach, ProdEndattach, AttachRange, Custodian name, Pagecount, NativeLink (for Microsoft Excel and PowerPoint files, a placeholder TIFF file should be produced indicating that the file was produced natively), From, To, CC, BCC, Email_subject, SentDate, SentTime, ReceiveDate, ReceiveTime, Author, Title, Doc_type, Date_created, TimeCreated, DateLastMod, TimeLastMod, Filename, Originalpath (Email: original location of email & edocs); FileExt, MD5HASH, and FullText. If you object to the requested form of production of electronically stored information set forth herein, state the form or forms of production of electronically stored information that you intend to use.

6. Unless otherwise indicated, the time period applicable to these Requests is June 1, 2013 through the present.

DOCUMENTS REQUESTED

1. All communications between You and CoOpportunity.
2. All documents submitted to You by CoOpportunity.

Schedule A
Page 5 of 7

3. All documents and communications concerning CoOpportunity's enrollment of members in its plans and claims experience, including, without limitation, any communications between or among You, CoOpportunity, Milliman, IID, and/or NDI concerning these matters.

4. All documents and communications concerning the risk corridor, reinsurance, or risk adjustment programs under the ACA as applied to CoOpportunity, including, without limitation, any communications concerning CoOpportunity's recording of receivables under any of these programs.

5. A copy of any regulations, policies, determinations, position papers, publications, pronouncements, or other statements of CMS concerning whether insurance companies could record receivables related to the risk corridor, reinsurance, or risk adjustment programs under the ACA.

6. All documents and communications concerning the topic of premium deficiency reserves with respect to CoOpportunity, including, without limitation, any communications regarding whether CoOpportunity should record a premium deficiency reserve, and any premium deficiency reserve that CoOpportunity recorded or contemplated recording.

7. A copy of any regulations, policies, determinations, position papers, publications, pronouncements, or other statements of CMS concerning the topic of premium deficiency reserves.

8. All documents and communications concerning CoOpportunity's risk-based capital ("RBC") levels, including, without limitation, CMS's assessment of CoOpportunity's RBC levels.

9. All documents and communications relating to Your oversight, monitoring, examination, audit, or review of CoOpportunity or CoOpportunity's financial statements, NAIC filings, financial condition, statutory surplus, admitted assets, debt, receivables, leases, loans, or transactions.

Schedule A
Page 6 of 7

10. All documents and communications concerning CoOpportunity's solvency or insolvency.

11. All documents and communications concerning Your investigation into or analysis of the cause or causes of CoOpportunity's placement into liquidation proceedings.

12. All documents and communications concerning the Solvency Loan, including, without limitation, all documents and communications concerning CoOpportunity's requests for draws on its Solvency Loan on or about December 30, 2013, March 31, 2014, May 2014, and September 22, 2014, and all documents upon which You relied to evaluate those requests.

13. All documents and communications concerning any other request CoOpportunity made to You in 2014 for funding.

14. All documents and communications concerning Your decision, communicated on or about December 16, 2014, to decline CoOpportunity's request for additional funding under the Series B solvency loan.

15. All documents produced by or to You in any action or investigation involving CoOpportunity, including, but not limited to, the actions captioned (1) *State of Iowa, ex rel. Nick Gerhart, Iowa Commissioner of Insurance v. CoOpportunity Health, Inc.*, Case No. EQCE077579 (Iowa District Court, Polk County); (2) *Doug Ommen, in his capacity as Liquidator of CoOpportunity Health, Inc., and Dan Watkins, in his capacity as Special Deputy Liquidator of CoOpportunity Health, Inc. v. Milliman, Inc., Kimberly Hiemenz, Michael Sturm, Stephen Ringlee, David Lyons, and Clifford Gold*, Case No. LACL138070 (Iowa District Court, Polk County); (3) *Nick Gerhart, in his capacity as Liquidator of CoOpportunity Health, Inc., and Dan Watkins, in his capacity as Liquidator of CoOpportunity Health, Inc. v. U.S. Department of Health and Human Services, Centers for Medicare & Medicaid Services, Sylvia Mathews Burwell, in her capacity as*

Schedule A
Page 7 of 7

Secretary of the U.S. Department of Health and Human Services, and the United States, No. 16-cv-00151 (U.S. District Court for the Southern District of Iowa); and (4) *Doug Ommen, in his capacity as Liquidator of CoOpportunity Health, Inc., and Dan Watkins, in his capacity as Special Deputy Liquidator of CoOpportunity Health, Inc. v. The United States of America*, No. 17-957 C (U.S. Court of Federal Claims), whether produced pursuant to subpoena, request for production of documents, or otherwise.

16. All communications between You and the Liquidators concerning CoOpportunity.
17. All communications between You and Milliman concerning CoOpportunity.
18. All communications between You and RSM concerning CoOpportunity.
19. All documents and communications concerning any services provided by RSM to CoOpportunity, including, without limitation, any audits of CoOpportunity's financial statements.
20. All documents and communications concerning any services provided by Milliman to CoOpportunity.
21. All communications concerning CoOpportunity between You and any state government entity or anyone acting or purporting to act on its behalf, including, without limitation, IID, NDI, and the state governments of Iowa and Nebraska.