

**BEFORE THE INSURANCE DEPARTMENT
OF THE
COMMONWEALTH OF PENNSYLVANIA**

**Statement Regarding the Acquisition of Control of or Merger with
Domestic Insurers:**

**Hospital Service Association of Northeastern Pennsylvania
d/b/a Blue Cross of Northeastern Pennsylvania;
First Priority Life Insurance Company, Inc.;;
HMO of Northeastern Pennsylvania, Inc.,
d/b/a First Priority Health**

By Highmark Inc.

**BCNEPA RESPONSE TO INFORMATION REQUEST 5.3.15.1 FROM
THE PENNSYLVANIA INSURANCE DEPARTMENT**

REQUEST 5.3.15.1:

For all Material Proceedings where liability of any Highmark Entity or BCNEPA Entity is claimed to be in excess of \$1,000,000 or where injunctive relief is sought, file a summary description of all Documents produced by or for any Highmark Entity in discovery in such matters.

RESPONSE:

BCNEPA certifies to the best of its knowledge, information, and belief that with respect to any BCNEPA Entity, all such Material Proceedings are identified in BCNEPA's response to Request 5.2.9.2(D) and, at this time, BCNEPA has not produced any Documents in discovery in such matters.

**Hospital Service Association of
Northeastern Pennsylvania
d/b/a Blue Cross of Northeastern
Pennsylvania ("BCNEPA")
19 North Main Street
Wilkes-Barre, PA 18711**