

**BEFORE THE NEW MEXICO OFFICE OF SUPERINTENDENT OF INSURANCE**

IN THE MATTER OF  
GOSPEL LIGHT MENNONITE  
CHURCH MEDICAL AID PLAN,  
DBA LIBERTY HEALTHSHARE,

Docket No. 2021-0085

Respondent.

**JOINT MOTION TO CONVERT HEARING SETTING TO STATUS CONFERENCE**

Respondent Gospel Light Mennonite Church Medical Aid Plan, dba Liberty HealthShare, by and through counsel, Harrison, Hart & Davis LLC (Carter B. Harrison IV and Daniel J. Gallegos), and Commonwealth Law Offices, P.C. (J. Michael Sharman, pro hoc vice), and Petitioner Office of Superintendent of Insurance, by and through counsel, Stephen P. Thies, hereby submit this joint motion to convert the evidentiary hearing set for July 13, 2022, into a status conference.

1. On March 8, 2022, the evidentiary hearing in this case began. Upon completion of Petitioner's presentation of evidence, the hearing was recessed.

2. On March 16, 2022, a scheduling conference was held to determine the date for commencement of the evidentiary hearing. The parties agreed on July 13, 2022.

3. Since the scheduling conference, Petitioner has provided Respondent with approximately 3,000-4,000 pages of discovery. Moreover, Petitioner has indicated that it has not produced a significant number of documents based upon the attorney-client privilege.

4. Respondent and Petitioner agree that the ends of justice, not to mention notions of fairness and efficiency, would counsel in favor of converting the July 13, 2022, evidentiary hearing setting to a status conference to address any outstanding issues prior to the resumption of the evidentiary hearing in this case.

## CONCLUSION

For these reasons, Respondent and Petitioner respectfully request that the evidentiary hearing currently be set for July 13, 2022, be converted to a status conference.

Respectfully submitted,

HARRISON, HART & DAVIS, LLC

By:



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OFFICE OF SUPERINTENDENT OF  
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*Attorney for Petitioner*

### **CERTIFICATE OF SERVICE**

I hereby certify that on this 7th day of July 2022, I submitted the foregoing Joint Motion to Convert Hearing Setting to Status Conference via email to the Hearing Officer, Rick Word, (richard.word@state.nm.us) and to OSI Legal Counsel, Stephen Thies ([Stephen.Thies2@state.nm.us](mailto:Stephen.Thies2@state.nm.us)), and filed the same using OSI's eDocket system.

HARRISON, HART & DAVIS, LLC

By: /s/ Daniel J. Gallegos  
Daniel J. Gallegos