

**GOVERNMENT OF THE DISTRICT OF COLUMBIA
DEPARTMENT OF INSURANCE, SECURITIES AND BANKING**

IN THE MATTER OF

Surplus Review and Determination for Group Hospitalization and Medical Services, Inc.

Order No. 14-MIE-012

**D.C. APPLESEED'S REQUEST FOR BRIEFING SCHEDULE ON
GHMSI'S MOTION TO STAY FURTHER PROCEEDINGS**

On February 10, 2015, Group Hospitalization and Medical Services, Inc. ("GHMSI") moved to stay all further proceedings under the Commissioner's December 30, 2014 Decision and Order. D.C. Appleseed strongly opposes the motion. In the event that the Commissioner does not summarily deny the motion, D.C. Appleseed respectfully requests an opportunity to be heard on the issue. Accordingly, we ask the Commissioner to order a briefing schedule under which D.C. Appleseed would file a response to GHMSI's motion to stay further proceedings by February 23, 2015, and GHMSI would file a reply in support of its motion by March 5, 2015.

Respectfully submitted,



Marialuisa Gallozzi
Kurt Calia
COVINGTON & BURLING LLP
One CityCenter, 850 Tenth Street, N.W.
Washington, DC 20001

*Counsel for D.C. Appleseed Center for Law and
Justice, Inc.*

CERTIFICATE OF FILING AND SERVICE

I certify that on this 13th day of February, 2015, I caused one copy of the foregoing

Response to be sent by electronic mail to the following:

Adam Levi, Assistant General Counsel
D.C. Department of Insurance and Securities Regulation
810 First Street, NE, Suite 701
Washington, D.C. 20002
Phone: 202-442-7759

E. Desmond Hogan
Dominic F. Perella
Kathryn L. Marshall
HOGAN LOVELLS US, LLP
555 13th Street, N.W.
Washington, D.C. 20004



Marialuisa Gallozzi