

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.

GHMSI'S RESPONSE TO D.C. APPLESEED'S MOTION TO INTERVENE AS A PARTY,
MOTION TO MODIFY SECOND SCHEDULING ORDER, AND
MOTION TO MODIFY STANDARD HEARING PROCEDURES

GHMSI hereby responds to D.C. Appleseed's motion of May 30, 2014, in the above-captioned proceeding.

In its motion, D.C. Appleseed requests that it be allowed "to make a closing statement at the hearing in this matter." Mot. 1. GHMSI respectfully submits that, if Appleseed is allowed to make a closing statement, GHMSI should be entitled to make the *final* closing statement so that it may present rebuttal arguments. That is appropriate because GHMSI is the regulated entity whose surplus is at issue in this hearing, and because DISB's regulations explicitly contemplate that GHMSI "should be allowed to make a final statement prior to the conclusion of the hearing." 26-A DCMR 4602.3(e).

Respectfully submitted,



Dominic F. Perella
Counsel for GHMSI