

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN**

URIEL PHARMACY HEALTH AND WELFARE PLAN; URIEL PHARMACY, INC.; HOMETOWN PHARMACY; AND HOMETOWN PHARMACY HEALTH and WELFARE BENEFITS PLAN, on their own behalf and on behalf of all others similarly situated,

Plaintiffs,

v.

ADVOCATE AURORA HEALTH, INC. and AURORA HEALTH CARE, INC.,

Defendants.

Case No. 2:22-cv-610

**PLAINTIFFS' OBJECTIONS AND MOTION
TO FILE UNDER RESTRICTED ACCESS**

Plaintiffs Uriel Pharmacy Health and Welfare Plan, Uriel Pharmacy, Inc., Hometown Pharmacy, and Hometown Pharmacy Health and Welfare Benefits Plan ("Plaintiffs"), respectfully move the Court for leave to file certain documents under restricted access. In support of this motion ("Motion"), Plaintiffs state as follows:

1. This Motion seeks to preliminarily restrict confidential documents that *other* parties contend contain reference to, or discussion of, confidential business information about the parties, until the Court rules on the objections set forth herein.

2. The documents subject to this Motion are being filed restricted pursuant to a Court-approved protective order, ECF 66. Plaintiffs' position on the sealing (support, objection, or no

position) to the continued sealing of the documents or materials is explained in Charts A and B below.

3. Where Plaintiffs object to the continued sealing of a document, such objection reflects Plaintiffs' position that the designating party likely cannot demonstrate good cause for withholding the document from the public record. Good cause exists where a document contains a trade secret, is covered by a recognized privilege, or contains information required by statute to be maintained in confidence. General L.R. 79(d)(3); *Baxter Int'l Inc. v. Abbott Lab'ys.*, 297 F.3d 544, 546 (7th Cir. 2002); *Love v. Med. Coll. of Wisconsin*, 2020 WL 13199737, at *1 (E.D. Wis. June 29, 2020). A confidentiality designation under a protective order is insufficient on its own to establish good cause. *Love*, at *1.

4. This Motion also seeks leave to file as restricted Plaintiffs' Memorandum of Law in Support of Plaintiffs' Motion for Class Certification ("Class Brief") as well as Plaintiffs' Proposed Trial Plan, as these documents quote from and/or rely upon documents that producing parties contend to be protected from disclosure. Plaintiffs are filing two versions of the Class Brief and the Trial Plan: a public redacted version and a restricted unredacted version.

5. This Motion pertains to two categories of documents: documents produced by Defendants Advocate Aurora Health, Inc. and Aurora Health Care Inc. ("AAH") and documents produced by various third parties ("Third Parties").

DOCUMENTS PRODUCED BY AAH

6. Chart A below identifies the AAH documents that Plaintiffs are preliminarily filing under seal, along with a description of the general nature of the information withheld from the public record, pursuant to Local Rule 79(d)(2).

7. Chart A also identifies Plaintiffs position as to the continued sealing of the document.

CHART A		
AAH Documents Designated Confidential		
Ex. to Class Cert.¹	General Nature	Plaintiffs' Position
1	Expert Report of Jeffrey J. Leitzinger, Ph.D., dated November 21, 2025	Object
2	Expert Rebuttal Report of Jeffrey J. Leitzinger, Ph.D., dated March 23, 2026	Object
3	Expert Report of David Dranove, Ph.D., dated November 21, 2026	Object
4	Expert Rebuttal Report of David Dranove, Ph.D., dated March 23, 2026	Object
5	Expert Report of Patrick S. Romano, M.D., M.P.H., dated November 21, 2026	Object
6	Expert Rebuttal Report of Patrick S. Romano, M.D., M.P.H., dated March 23, 2026	Object
7	Titus Muzi Interview Notes, dated June 5, 2018	Object
8	Amendment No. 12 to Physician Hospital Organization Participation Agreement (Humana / Aurora)	Object
9	Transcript of Richard Klein's deposition on May 9, 2025	Object
10	Transcript of Larry Lenz's 30(b)(6) deposition on October 16, 2025	Object
11	Document titled Innosight Discussion Document dated May 24, 2018	Object
12	Advocate Aurora Health Discussion Document dated June 5, 2018	Object
13	Document titled Aurora Health Care Managed Care Overview	Object
14	Advocate Aurora Health, Inc. Narrative Response to Specification 10 of Civil Investigative Demand	Object
15	Document titled Standard Contract Terms	Object
18	Letter from Aurora Health Care to United HealthCare Insurance Company dated November 27, 2018	Object
19	Email from Jeff Anderson to Richard Heim and Don Calcagno dated December 18, 2018	Object
20	Letter from Aurora Health Care to Humana, Inc. dated January 10, 2019	Object

¹ "Ex. to Class Cert." refers to the Exhibit number given to the document in the Declaration of Michaela L. Wallin, filed in support of Plaintiffs' Motion for Class Certification.

CHART A		
AAH Documents Designated Confidential		
Ex. to Class Cert.¹	General Nature	Plaintiffs' Position
21	Email from Larry Lenz to Jeff Anderson dated January 18, 2019	Object
25	Message from Jeff Anderson to Richard Klein and Titus Muzi	Object
30	Email from Titus Muzi to Richard Klein re Contract Amendment dated December 4, 2018	Object
34	Email from Titus Muzi to Richard Klein re DNV Survey and Process dated December 4, 2018	Object
36	Email from Larry Lenz to Titus Muzi and Daniel Stahlkopf dated January 28, 2020	Object
37	Email from Titus Muzi to Richard Klein dated November 29, 2018	Object
38	Email from Jeff Anderson to Michael Dean dated June 13 2019	Object
39	Email from Larry Lenz to Titus Muzi dated June 8, 2020	Object
40	Aurora Health Care 2021 UHC Contracting dated October 28, 2018	Object
41	Email from Jeff Anderson to Self re Cigna Meeting dated October 19, 2018	Object
42	Email from James Ramsey to Daniel Stahlkopf and Jill Fyock dated Augst 4, 2023	Object
43	Email from Daniel Stahlkopf to Brent Estes dated April 23, 2021	Object
44	Document titled Aurora Health Care Managed Care Contracting	Object
48	Transcript of Richard Klein's 30(b)(6) deposition on October 21, 2025	Object
49	Aurora Quartz Medicare Advantage Path to Purchase	Object
50	Email from Richard Klein to Titus Muzi dated December 22, 2020	Object
51	Email from Larry Lenz to Daniel Stahlkopf dated July 15, 2020	Object
52	Email from David Stahlkopf to Mimi Foote dated May 27, 2021	Object
53	Email from Larry Lenz to Jeff Anderson dated January 18, 2019	Object
54	Email from Titus Muzi to Jeff Anderson dated January 24, 2019	Object
56	Transcript of Richard Klein's deposition on March 19, 2026	Object
57	Document titled Wisconsin Managed Care Overview	Object

CHART A		
AAH Documents Designated Confidential		
Ex. to Class Cert.¹	General Nature	Plaintiffs' Position
58	Document titled Commercial Physician Reimbursement	Object
59	Email from Daniel Stahlkopf to Titus Muzi dated June 24, 2020	Object
60	Document titled UHC Commercial Update	Object
61	Document titled Retail Imaging Strategy	Object
62	Email from Daniel Stahlkopf to Titus Muzi dated June 24, 2020	Object
63	Email from David Brzozowski to Larry Lenz dated September 28, 2022	Object
64	Document titled Strategic Pricing Assessment – WI Hospital/Physician & IL Physician Chagemasters	Object
65	Email from Jeffrey Grzybowski to Daniel Stahlkopf dated September 26, 2022	Object
66	Document titled 2018 Employer Health Insurance and Other Products Insights	Object
67	Document titled Employer Health Insurance and Employer Programs Report, January 2023 Results	Object
68	Document titled Aurora Brand Update: Wave 5	Object
70	Document titled Consumer Pulse Live: Aurora Brand Update February 2018	Object
74	Transcript of Paul Blomeyer's deposition on July 15, 2025	Object
85	Document titled Advocate Aurora Health Managed Care Contracting	Object
87	Transcript of Jim Skogsbergh's deposition on June 26, 2025	Object
88	Transcript of Jeff Anderson's deposition on June 11, 2025	Object
90	Email from Titus Muzi to Larry Lenz and Daniel Stahlkopf dated December 5, 2019	Object

8. Plaintiffs made a good faith attempt to avoid this motion or to limit the scope of the documents or materials subject to sealing under the motion. Specifically, beginning on May 19, 2026, Plaintiffs reached out to AAH to advise that they were going to be filing materials designed as confidential by AAH, and that they wished to confer on the matter. Plaintiffs subsequently provided AAH with a list of preliminary documents to be filed under seal (even as Plaintiffs'

drafting of the motion for class certification was under way), and conferred through several communications to discuss the scope of the restricted filing. Where Plaintiffs object to the continued sealing of a document, Plaintiffs have provided that objection to AAH, pursuant to Local Rule 79(d)(7).

DOCUMENTS PRODUCED BY THIRD PARTIES

9. Chart B below identifies the Third Party documents that Plaintiffs are preliminarily filing under seal, along with a description of the general nature of the information withheld from the public record, pursuant to Local Rule 79(d)(2).

10. Where a document is only designated as partially confidential, Plaintiffs are filing a public, redacted version.

11. Chart B also identifies Plaintiffs’ position as to the continued sealing of the document.

CHART B			
Third-Party Documents Designated Confidential			
Ex. to Class Cert.	General Nature	Plaintiffs’ Position	Custodian / Third-Party
16	Redacted email from Barry Eldridge to Paul Nobile dated December 17, 2019	Support	Anthem Blue Cross Blue Shield
17	Redacted email from Scott Gerhart to Amy Patrick and Andrea Lathers dated December 7, 2019	Support	Anthem Blue Cross Blue Shield
22	Redacted excerpt of transcript of Andrea Lathers's 30(b)(6) deposition on May 27, 2025	Support	Anthem Blue Cross Blue Shield
23	Email from Joanne Beck to Kristi Coklas dated October 30, 2020	Support	United Healthcare Group
28	Redacted excerpt of transcript of Paul Maxwell's 30(b)(6) deposition on June 5, 2025	Support	Humana
29	Document titled North Central Region: Milwaukee, Supply Chain Risk Evaluation	Support	Humana

CHART B			
Third-Party Documents Designated Confidential			
Ex. to Class Cert.	General Nature	Plaintiffs' Position	Custodian / Third-Party
31	Document titled North Central Region: Green Bay, Supply Chain Risk Evaluation	Support	Humana
32	Document titled UnitedHealthcare Local Wisconsin/Michigan 2021 Business Plan	Support	United Healthcare Group
33	Document titled Wisconsin Nexus ACO July 2022 FAQ for Sales and Account Management	Support	United Healthcare Group
35	Redacted email from Scott Gerhart to Justin Brown dated February 20, 2019	Support	Anthem Blue Cross Blue Shield
45	Redacted email from Kaitlin Fink to Aaron Jackson dated February 28, 2020	Support	Common Ground
46	Excerpt of transcript of Paul Spencer's 30(b)(6) deposition on September 15, 2025	Support	Froedtert Health
47	Document titled Advocate Aurora Health Renewal Interests	Support	United Healthcare Group
72	Redacted email from Andrea Lathers to Amy Patrick dated June 29, 2020	Support	Anthem Blue Cross Blue Shield
73	Redacted email from John Foley to Sandi Camp dated March 3, 2014	Support	Anthem Blue Cross Blue Shield
75	Document titled 20180522 Sylvia Metzger Interview Notes	Opposed	Huron Consulting Group
76	Document titled Advocate Aurora Health 101	Opposed	Huron Consulting Group
77	Document titled UHC Preliminary Proposal Range	Opposed	Milliman
78	Redacted letter from Juliet Spector to Daniel Bailey	Support	ProHealth Care
79	Redacted email from Heather Olivia to Larry Lenz and Daniel Stahlkopf dated July 26, 2023	Support	Wisconsin Physicians Service (WPS)
80	Email from Matthew Clark to Stephen Schooff	Support	Froedtert Health
83	Redacted excerpt of transcript of Naomi Wedin's 30(b)(6) deposition on January 20, 2025	Support	Bellin Health

CHART B			
Third-Party Documents Designated Confidential			
Ex. to Class Cert.	General Nature	Plaintiffs' Position	Custodian / Third-Party
86	Excerpt of transcript of Joanna Beck's 30(b)(6) deposition on July 31, 2025	Support	United Healthcare Group
89	Redacted excerpt of transcript of Shelley Turk's 30(b)(6) deposition on June 16, 2025	Support	Blue Cross Blue Shiel of Illinois

12. Plaintiffs made a good faith attempt to avoid this motion or to limit the scope of the documents or materials subject to sealing under the Motion. Specifically, beginning on April 29, 2026, Plaintiffs reached out to the Third Parties to advise that they were going to be filing materials that they designed as confidential, and that it wished to confer on the matter.

13. Plaintiffs provided the Third Parties with lists of the documents to be filed under seal (even as Plaintiffs' drafting of the motion for class certification was under way), and conferred through several communications (both by email and through live conversation) to discuss the scope of the restricted filing. Where Plaintiffs object to the continued sealing of a document, Plaintiffs have provided that objection to the Third Parties, pursuant to Local Rule 79(d)(7).

CONCLUSION

WHEREFORE, Plaintiffs respectfully request that the Court: (1) grant them leave to preliminarily file the documents in Charts A and B as restricted only to the parties; (2) rule on the objections set forth in Charts A and B; and (3) grant them any other relief the Court deems just and appropriate.

Dated: June 2, 2026

Respectfully submitted,

/s/ Michaela L. Wallin

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