

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

URIEL PHARMACY HEALTH AND WELFARE
PLAN, on their own behalf and on behalf of all
others similarly situated,

Plaintiffs,

Case No. 2:22-cv-610-LA

v.

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

Defendants.

PATRICK SHAW; DEBRA SHAW; and HALEY
SHAW, on their own behalf and on behalf of all
others similarly situated,

Plaintiffs,

Case No. 2:24-cv-157-LA

v.

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

Defendants.

**DEFENDANTS' L.R. 7(h) EXPEDITED NON-DISPOSITIVE MOTION TO FILE
CERTAIN EXHIBITS TO DEFENDANTS' DECLARATION IN SUPPORT OF
OPPOSITION TO PLAINTIFFS' MOTION TO COMPEL DEFENDANTS'
REPRODUCE CORPORATE WITNESS TO TESTIFY ON DEFENDANTS'
COMMUNICATIONS WITH FEDERAL AND STATE AUTHORITIES UNDER
RESTRICTED ACCESS**

Pursuant to Civil L.R. 7(h) and General L.R. 79(d), Defendants Advocate Aurora Health, Inc. and Aurora Health Care, Inc. ("AAH") respectfully move to restrict access to Exhibits 4, 5, 6, 7, and 8 (collectively, the "Redacted Documents") attached to the Declaration of Anne Johnson Palmer filed in support of AAH's Opposition to Plaintiffs' Motion to Compel, as these Exhibits contain confidential or highly confidential party and non-party information.

The Redacted Documents contain references to, and discussion of, confidential business information about AAH's contractual provisions and negotiations. These documents also quote deposition testimony of party and non-party witnesses that have been designated as confidential or highly confidential under the Protective Order in this case. This information includes sensitive non-public information concerning the negotiations and contract terms between AAH and non-parties. The release of such confidential business information may cause unnecessary harm to AAH or third parties as "public disclosure of the information would effectively afford other [medical providers] an unearned competitive advantage—unearned because the issue of public disclosure arises from the adventitious circumstances of the [document]'s having become caught up in litigation and as a result having become filed in court." *Formax Inc. v. Alkar-Rapidpak-MP Equip., Inc.*, No. 11-C-0298, 2014 WL 792086, at *3 (E.D. Wis. Feb. 25, 2014) (citation omitted). As a result, such information should be restricted. See *Patriot Universal Holdings, LLC v. Formax, Inc.*, 24 F. Supp. 3d 802, 808 (E.D. Wis. 2014) (granting motion to seal where "the materials contained therein [were] confidential business records"). AAH's counsel certifies that it contacted the non-party whose confidential information is implicated, and that non-party's counsel has requested any reference to the non-party's information be redacted and treated consistent with its designation as highly confidential under the protective order. AAH's counsel further certifies that it conferred with Plaintiffs' counsel on the proposed redactions to these materials and Plaintiffs' counsel indicated that Plaintiffs take no position on the proposed redactions.

Concurrent with this motion, AAH will file on the public docket a redacted version of the Redacted Documents that redacts the aforementioned information that AAH is seeking to file with restricted access in accordance with General Local Rule 79(d)(2).

Date: October 27, 2025

/s/ Daniel Conley

Daniel E. Conley
Nathan J. Oesch
QUARLES & BRADY LLP
411 East Wisconsin Avenue, Suite 2400
Milwaukee, WI 53202
Telephone: 414.277.5000
Fax: 414.271.3552
daniel.conley@quarlesbrady.com
nathan.oesch@quarlesbrady.com

Matthew Splitek, SBN 1045592
QUARLES & BRADY LLP
33 E. Main St, Suite 900
Madison, WI 53703
Telephone: 608.251.5000
Fax: 608.251.9166
matthew.splitek@quarles.com

Jane E. Willis
ROPES & GRAY LLP
Prudential Tower, 800 Boylston Street
Boston, MA 02199-3600
Telephone: 617.951.7000
Fax: 617.951.7050
jane.willis@ropesgray.com

Anne Johnson Palmer
ROPES & GRAY LLP
Three Embarcadero Center
San Francisco, CA 94111
Telephone: 415.315.6300
Fax: 415.315.6350
anne.johnsonpalmer@ropesgray.com

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

URIEL PHARMACY HEALTH AND WELFARE
PLAN, on their own behalf and on behalf of all
others similarly situated,

Plaintiffs,

v.

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

Case No. 2:22-cv-610-LA

Defendants.

PATRICK SHAW; DEBRA SHAW; and HALEY
SHAW, on their own behalf and on behalf of all
others similarly situated,

Plaintiffs,

v.

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

Case No. 2:24-cv-157-LA

Defendants.

**[PROPOSED] ORDER GRANTING DEFENDANTS' L.R. 7(h) EXPEDITED NON-
DISPOSITIVE MOTION TO FILE CERTAIN EXHIBITS TO DEFENDANTS'
DECLARATION IN SUPPORT OF OPPOSITION TO PLAINTIFFS' MOTION TO
COMPEL DEFENDANTS TO REPRODUCE CORPORATE WITNESS TO TESTIFY
ON DEFENDANTS' COMMUNICATIONS WITH FEDERAL AND STATE
AUTHORITIES UNDER RESTRICTED ACCESS**

Upon review of Defendants' Civil L.R. 7(h) Expedited Non-Dispositive Motion to File Certain Exhibits to Defendants' Declaration in Support of Opposition to Plaintiffs' Motion to Compel Under Restricted Access, the Court hereby **GRANTS** and **DIRECTS** the Clerk to restrict public access to the docket entries containing the unredacted version of Exhibits 4, 5, 6, 7 and 8.

Dated: October __, 2025

BY THE COURT:

Hon. Lynn S. Adelman
U.S. District Court for the
Eastern District of Wisconsin