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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

**JANE DOE; STEPHEN ALBRIGHT;
AMERICAN KIDNEY FUND, INC.;**
**and DIALYSIS PATIENT
CITIZENS, INC.,**

Plaintiffs,

v.

**ROB BONTA, in his Official
Capacity as Attorney General of
California; RICARDO LARA in his
Official Capacity as California
Insurance Commissioner; SHELLY
ROUILLARD in her official Capacity
as Director of the California
Department of Managed Health
Care; and TOMAS ARAGON, in his
Official Capacity as Director of the
California Department of Public
Health,**

Defendants.

Case No. 8:19-cv-2105-DOC-(ADSx)

**ORDER GRANTING
DEFENDANTS' APPLICATION
FOR LEAVE TO FILE UNDER
SEAL [126]**

1 The Court, having reviewed the pleadings on file and considered the argument
2 of counsel, and with good cause appearing, hereby orders the following documents
3 be filed under seal pursuant to the Local Rule 79-5.2:

4 • A document titled “Premium Impacts of ESRD Patients in the Individual
5 Market (Avalere),” produced in this action and designated Confidential by Plaintiff
6 AKF pursuant to the protective order entered in these cases, Bates Nos. AKF-DOE-
7 10130-10135, 10136, attached as Exhibit 2e to the Declaration of Lisa Plank.

8 • A document titled “FMC Insurance Counselor training program –
9 undated ‘Day 5’ training,” produced in this action and designated Confidential by
10 Plaintiff Fresenius pursuant to the protective order entered in these cases, Bates
11 Nos. FMC4921-4936, attached as Exhibit 3b to the Declaration of Lisa Plank.

12 • A document relating to “2018 Insurance Coordinator Goals,” produced in
13 this action and designated Confidential by Plaintiff Fresenius pursuant to the
14 protective order entered in these cases, Bates No. FMC4940, attached as Exhibit
15 3c to the Declaration of Lisa Plank.

16 • A November 4, 2017 document relating to “Financial Coordinator Bonus
17 Proposal,” produced in this action and designated Confidential by Plaintiff
18 Fresenius pursuant to the protective order entered in these cases, Bates Nos.
19 FMC4941-4943, attached as Exhibit 3e to the Declaration of Lisa Plank.

20 • Unredacted versions of the 2018 and 2019 Donation Letters from
21 Plaintiff DaVita to Plaintiff AKF specifying annual contribution and subsequent
22 increases to same, produced in this action and designated Confidential by Plaintiff
23 DaVita pursuant to the protective order entered in these cases, Bates Nos. DAVITA
24 8273-8275, attached as Exhibit 4a to the Declaration of Lisa Plank.

25 • Pages 47, 48, 50-51, 63-64, 66, 69-70, 72, 119-120, 148 of the November
26 18, 2021 deposition of Steve Dover in these matters and designated Confidential by
27 Plaintiff Fresenius pursuant to the protective order entered in these cases, attached
28 as Exhibit 14b to the Declaration of Lisa Plank.

1 • Unredacted versions of the Memorandum of Points and Authorities in
2 Support of Defendants’ Motion for Summary Judgment as to the *Doe* Complaint,
3 Portions of the Memorandum of Points and Authorities in Support of Defendants’
4 Motion for Summary Judgment as to the *Fresenius* Complaint, and portions of the
5 Statement of Undisputed Facts in support of both motions, all of which include
6 references to information that Plaintiffs have deemed Confidential pursuant to the
7 protective order entered in these cases.

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9 **IT IS SO ORDERED.**

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11 Dated: February 28, 2022



The Honorable David O. Carter

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