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UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

SUZANNE KISTING-LEUNG, *et al.*,

Plaintiffs,

v.

CIGNA CORPORATION, *et al.*,

Defendants.

Case No. 2:23-cv-01477-DAD-CSK

**[PROPOSED] STIPULATED ORDER
REGARDING THE COLLECTION AND
PRODUCTION OF DOCUMENTS AND
ELECTRONICALLY STORED
INFORMATION**

1 Defendants the Cigna Group (f/k/a Cigna Corporation) and Cigna Health and Life Insurance
2 Company (together, “Cigna” or “Defendants”) and Samantha Dababneh, Randall Rentsch, and
3 Abdulhussein Abbas (collectively “Plaintiffs”) (individually, a “Party” and collectively, the
4 “Parties”), by and through their respective counsel, hereby stipulate as follows:

5 1) As set forth in the Parties’ Joint Scheduling Report Pursuant to Rule 26(f) (Dkt. 58),
6 filed on May 23, 2025, the Parties have agreed to utilize the same document custodians, search terms,
7 relevant time period, and technology assisted review protocol (“TAR Protocol”) as in *Snyder, et al.*
8 *v. The Cigna Group, Cigna Health and Life Ins. Co., and Cigna Health Mgmt., Inc.*, 3:23-cv-1451-
9 OAW (D. Conn. Nov. 2, 2023) (“*Snyder* Action”).

10 2) The Parties also intend to use the Stipulation Regarding the Collection and Production
11 of Documents and Electronically Stored Information from the *Snyder* Action (“ESI Stipulation”),
12 attached as Exhibit A, which sets forth various requirements—such as requirements regarding field
13 names, de-duplication, email threading, and privilege logs—that the Parties agree should be the same
14 in the above-captioned action as they are in the *Snyder* Action, to enable Cigna to utilize its document
15 productions from the *Snyder* Action in this action.

16 3) Section II.A of the ESI Stipulation sets forth disclosure and meet and confer
17 requirements regarding custodians, Section III.A requires the parties to meet and confer regarding
18 search terms, date ranges, and other search queries and methodologies, and Section III.B obligates
19 the parties to meet and confer regarding an appropriate TAR protocol and search terms and sources
20 of ESI to be searched. As set forth in paragraph 1 herein, the parties have agreed that Cigna may
21 utilize the same custodians, search terms, date ranges, and TAR Protocol from the *Snyder* Action,
22 and therefore stipulate that Cigna has complied with its obligations set forth in Sections II.A, III.A,
23 and III.B of the ESI Stipulation already.

24 4) The Parties further stipulate that, as set forth in the Parties’ Joint Scheduling Report
25 Pursuant to Rule 26(f), they agree to meet and confer to discuss additional search terms specific to
26 the named Plaintiffs in this matter (such as names and plan sponsor information) that may be
27
28

necessary. The process by which the parties intend to conduct that process is set forth in the Parties' [Proposed] Stipulated Order Regarding Use of Technology Assisted Review (Dkt. ____).

5) Section VII of the ESI Stipulation sets forth various requirements for the parties' privilege logs. For the avoidance of doubt, the Parties agree that Cigna may produce the same privilege logs in both the *Snyder* Action and in the above-captioned matter, which Plaintiffs will retain the right to independently challenge using the procedure set forth in Section VII. To the extent the Parties agree to case-specific additional search terms in this matter (as discussed in paragraph 4) that result in Cigna identifying additional responsive, privileged documents, Cigna will produce a corresponding log for those documents consistent with the requirements of the ESI Stipulation.

6) The Parties otherwise agree that the provisions set forth in the ESI Stipulation shall apply in the above-captioned matter.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

Dated: August 25, 2025

Respectfully submitted,

/s/ Glenn A. Danas

/s/ Dmitriy Tishyevich

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8 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

9
10
11 Dated: August ____, 2025

By: _____

Honorable Dale A. Drozd
United States District Judge

EXHIBIT A

**UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT**

AMY SNYDER, JAMES WINGO, STACI
FOSTER WHITNEY, and SCOTT SCHULTZ,
on behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

THE CIGNA GROUP, CIGNA HEALTH
AND LIFE INSURANCE CO., and CIGNA
HEALTH MANAGEMENT, INC.,

Defendants.

Case No.: 3:23-cv-01451-OAW

May 6, 2024

**STIPULATION REGARDING THE COLLECTION AND PRODUCTION OF
DOCUMENTS AND ELECTRONICALLY STORED INFORMATION**

Plaintiffs Amy Snyder, James Wingo, Staci Foster Whitney, and Scott Schultz, individually and on behalf of all others similarly situated, and Defendants The Cigna Group, Cigna Health and Life Insurance Co., and Cigna Health Management, Inc. (individually, a “Party” and collectively, the “Parties”) stipulate regarding the production of documents and electronically stored information (“ESI”) (documents and ESI are collectively referred to herein as “Documents” unless otherwise noted and are defined below) as follows in the above-captioned case (the “Action”).

I. GENERAL TERMS

A. Application. The procedures set forth in this Stipulation shall govern the production of Documents (as those terms are used in the Federal Rules of Civil Procedure, including Rule 34(a)) relevant to this Action. In the event that any Party identifies a particular source of responsive Documents or ESI for which application of this Stipulation would be impossible or otherwise

unduly burdensome or impractical, the Party identifying the source will promptly notify other Parties, and the Parties may meet and confer concerning the source.

B. Scope of Discovery. This Stipulation does not affect the proper subject matter of discovery in this Action. Nor does this Stipulation imply that Documents or ESI produced under its terms are relevant or admissible in this Action or in any other litigation.

C. Preservation of Data. This Stipulation does not alter or expand the preservation obligations of any Party.

D. Privileges. Nothing in this Stipulation shall be interpreted to require the disclosure of Documents or ESI that a Party contends are protected by the attorney-client privilege, the work-product doctrine, or any other applicable privilege or protection.

E. Legibility. The Parties will make reasonable efforts to ensure that all Documents and ESI they produce are legible. If a copy is not legible (i) and it is possible to produce a legible copy, such a legible copy will be produced (subject to relevant general and specific objections) within five (5) business days of a request from a receiving Party, or as mutually agreed upon by the Parties, but (ii) if no legible copy can be made, then the original will be made available for inspection and copying within ten (10) business days of a request from a receiving Party, or as mutually agreed upon by the Parties.

F. Modification and Amendment. Subject to entry by the Court, this Stipulation may be modified or amended by written agreement of the Parties.

G. Reservation of Rights. The Parties reserve all rights under the Federal Rules of Civil Procedure, the Local Rules of Practice of the U.S. District Court for the District of Connecticut, and applicable Judicial Practice Standards.

H. Definitions.

1. “Document” or “electronically stored information” or “ESI” as used herein, is defined to be synonymous in meaning and equal in scope to the usage of the term “documents or electronically stored information” in Fed. R. Civ. P. 34(a)(1)(A).

2. “ESI” means and refers to information created, manipulated, communicated, stored (on-site and/or off-site), and best utilized in electronic, digital, and/or native form, including, without limitation, the following: e-mail; word processing documents; spreadsheets; presentation documents; graphics; animations; images; audio, video, and audiovisual recordings; voicemail; text messages; and the like (including attachments to any of the foregoing), stored on databases, networks, computers, computer systems, servers, archives, backup or data recovery systems, removable media, the internet, handheld wireless devices, smart phones, and/or other storage media, requiring the use of computer hardware and software.

3. “Metadata” is defined as (i) information embedded in a Native File that is not ordinarily viewable or printable from the application that generated, edited, or modified such Native File; and/or (ii) information generated automatically by the operation of a computer or other information technology system when a Native File is created, modified, transmitted, deleted, or otherwise manipulated by a user of such system.

4. “Native File(s)” means ESI in the electronic format of the application in which such ESI is normally created, viewed, and/or modified.

5. “Technology Assisted Review” or “TAR” means generally the process whereby software scores and ranks (or presents) documents based on their likely

responsiveness, and human reviewers review for responsiveness the documents prioritized (or presented) by the process.

6. “TAR Software” means the software a Party elects to use to perform the TAR.

II. CUSTODIANS, SOURCES, AND ACCESSIBILITY OF DOCUMENTS AND ESI

A. Custodians. Within (30) days of the latest of (1) Entry of this Order; (2) receipt of a written discovery request from another Party after entry of this Order; or (3) from Entry of an Order consistent with this Stipulation, the producing Party shall identify a reasonable subset of ESI custodians, if any, that are likely to have ESI responsive to those written discovery requests. Prior to the production of ESI, each Party shall provide to all other Parties a list of ESI custodians from whom ESI will be collected and a good-faith explanation describing how the reasonable subset of ESI custodians was determined; for example, their current and former job titles and descriptions of their work. The Parties retain the right, upon reviewing the initial production of documents, and conducting other investigation and discovery, to request that files from custodians or additional custodians be searched and to meet and confer regarding such request. If the Parties disagree as to the additional searches or additional custodians after a good faith meet and confer, the Party seeking discovery may submit the issue to the Court in accordance with the Court’s procedures. Following agreement on a list of Custodians, each Party will begin collecting potentially responsive documents, ESI, and information in the possession, custody, or control of each Custodian (the “Collected Documents”).

B. Sources. The Parties shall take reasonable efforts to identify and collect any Documents and ESI potentially relevant to this Action from all sources of potentially responsive, non-duplicative information, including, but not limited to, servers, network drives, and shared

drives, that are within the Parties' possession, custody, or control. To the extent a producing party has identified and is aware of custodial or non-custodial files or folders as containing responsive Documents or ESI (the "Targeted Collection" documents), those Targeted Collection files or folders shall be collected and reviewed for responsiveness and potential production (if not privileged) regardless of whether the underlying Documents or ESI in those Targeted Collection files or folders were to hit on a search term or otherwise be identified through the use of TAR.

C. Accessibility of ESI. The Parties agree that if the producing Party determines a source is not "reasonably accessible" pursuant to Fed. R. Civ. P. 26(b) during the search and collection process it will provide sufficient information regarding the accessibility of the source to enable the Parties to confer in good faith about whether such source or Document will be produced or methods by which the information can be produced. If the Parties disagree as to the accessibility of the source after a good faith meet and confer, the Party seeking discovery from the source may submit the issue to the Court or its designee in accordance with the Court's procedures.

III. SEARCH OF ESI AND TECHNOLOGY-ASSISTED REVIEW

A. Search Queries and Methodologies. The Parties shall meet and confer on the application, if any, of search or other filtering technologies to be applied to custodial and non-custodial Documents and ESI, including search terms, file types, date ranges, transparent validation procedures and random sampling, predictive coding, or other appropriate advanced technology, including systems used to track review status related to those advanced technologies.

B. Collection of ESI. The Parties shall use best efforts to collect ESI in a forensically sound manner that does not alter Metadata or other file attributes. In responding to discovery requests, a reasonable inquiry must be made. As part of this inquiry, the producing Parties may use technology-assisted review ("TAR") or keyword searching to help them to identify responsive

ESI. If any Party chooses to use TAR or keyword searching to identify potentially responsive ESI, that Party shall notify the other Party in advance to meet and confer with regard to an appropriate TAR protocol or search terms to be used and the sources of ESI to be searched. If the Parties cannot agree to a TAR protocol or keywords to be used or sources of ESI to be searched, and are unable to resolve any disputes, any Party may file an appropriate motion for determination by the Court. During the pendency of any such motion, the producing Party's production obligation (to the extent it is dependent on resolution of such TAR protocol or keywords) will be stayed.

C. Email Threading. The Parties agree that only the most-inclusive email in an email thread needs to be reviewed or produced, and that to the extent multiple unique most-inclusive email threads branch from an initial sent email, each will be considered a separate most-inclusive email for purposes of review and production. To the extent an underlying email within a thread includes an attachment, that email with the attachment will be considered to be a most-inclusive document branch and also separately reviewed or produced. Only the most-inclusive documents as described in this paragraph will need to be reviewed or logged for privilege; however, the parties will identify in a privilege log all individuals that were authors, recipients, and blind copy recipients to the email thread, not just the most-inclusive thread.

IV. PRODUCTION OF HARD-COPY DOCUMENTS

A. File Type. The Parties shall produce hard copy documents as Group IV black and white, single-page TIFF images at not less than 300 dpi resolution, along with associated document-level text files, image load files (OPT) indicating appropriate document and family breaks, as well as Metadata load files in delimited text format containing the fields required by Appendix A. The TIFF image must convey the same information as if the Document were produced in paper.

B. Extracted Text and OCR. For documents that do not contain redactions, the producing Party will produce an extracted text file for each electronic document where text can be extracted, and an Optical Character Recognition (“OCR”) text file for 1) each imaged paper document, and 2) each electronic document for which text cannot be extracted. For documents that contain redactions, the producing Party will provide an OCR text file for the unredacted portions of such documents. Said extracted text and OCR files shall be produced as document level text files and be named consistently with their corresponding TIFF files ([producing Party’s Name]-000000001.tif and [producing Party’s Name]-000000001.txt).

C. Color Copies. A receiving Party may request that specific Hard-Copy Documents be produced in color for good cause.

D. Family Groups. The Parties shall maintain family groups together in one production volume and shall not break family groups apart in separate production volumes.

E. Scan Size. Reasonable efforts will be used to scan Documents at or near their original size, so that the print or image on the Document appears straight, and not skewed. Reducing image size may be necessary to display production numbers and confidentiality designations without obscuring text. Physically oversized originals will appear reduced. A producing Party reserves the right to determine whether to produce oversized Documents in their original size. A receiving Party may request that specific oversized Documents be produced in their original size for good cause.

F. Notes and Attachments. If any original Document has notes or attachments affixed thereto, the Parties will produce copies of those Documents with the accompanying notes and attachments unless the note or attachment itself is determined to be privileged or excepted (*i.e.*,

the attachment is corrupted or a Non-Convertible File-type as set forth in Sections V.G-H) during processing.

V. PRODUCTION OF ESI

A. File Type. Except as specified in Section V.C below, the Parties shall produce ESI as Group IV black and white, single-page TIFF images at not less than 300 dpi resolution, along with associated document-level text files, image load files (OPT) indicating appropriate document and family breaks, as well as Metadata load files in delimited text format containing the fields required by Section V.B.

B. Metadata. The Parties will take reasonable steps to preserve, to the extent they have a value, all Metadata associated with ESI even if such Metadata is not specified in Appendix A for production. Nothing in this paragraph shall be construed to obligate a party to (i) create new Metadata that is not already in existence at the time of collection of the ESI (except for the populating of the All Custodians field as discussed below) except those fields which are specific to the litigation (*i.e.* Bates Number, Redacted, etc.), (ii) produce Metadata that is privileged or attorney work product (although such withheld metadata must be included in privilege log), or (iii) produce Metadata that is protected from disclosure by statute or regulation.

C. Word Processing Files. Documents such as those created by Microsoft Word will be produced in such a manner that comments and tracked changes, including, where available, the identity of the person making that change or comment, will be visible. For PowerPoint-type presentation decks, this shall include, but is not limited to, any speaker notes, comments, hidden slides, and similar data. All Metadata contained in or associated with each such file will be produced to the extent technologically possible.

D. Spreadsheets. Microsoft Excel and other spreadsheet files shall be produced as Native Files. For Excel and other spreadsheet files, the Parties agree to produce a single slipsheet for each Excel file branded with the text “File Produced In Native Format” along with the corresponding Filename, Bates number, and confidentiality designation. Spreadsheets which require redaction may be produced in the TIFF file format, provided that hidden worksheets, rows and columns, all cell values, annotations and notes are made visible.

E. Native Files. A Party may request that another Party produce other ESI as Native Files for good cause.

F. Production Format for Databases and Audio-Visual Files. The Parties agree to meet and confer regarding the production of relevant and responsive data found within databases or enterprise software, as well as any audio, visual, or media files.

G. DeNIST. Common system and program files as defined by the NIST library (which is commonly used by e-discovery vendors to exclude system and program files from document review and production) need not be processed, reviewed, or produced.

H. Certain file types do not meaningfully convert to TIFF images and to the extent that they are relevant and responsive, the parties agree to meet and confer regarding production of such files in their Native format. A non-exhaustive list of example file types which are not conducive to conversion into .TIFF or .TIF format include but are not limited to: *.exp *.ilk *.res *.trg *.tlh *.idb *.pdb *.pch *.opt *.lib *.cab *.mov *.mp3 *.swf *.psp *.chi *.chn *.com. *.dll *.exe *.hlp *.ivi *.ivt *.ix *.msi *.nls *.obj *.ocx *.rmi *.sys *.tmp *.ttf *.vbx *.wav *.wpg *.iso *.pdb *.eps *.mpeg *.mpg *.ram *.rm *.psd *.ai *.aif *.bin *.bqx *.snd *.mpe *.wnw *.wma *.xfd *.db *.bat *.xnk *.qtl *.kob *.mso *.dat *.m4a *.bak *.xll *.blank *.wdf *.cdo *.snp *.rename *.mdi *.sda

*.ren *.001 *.crf *.dtf *.eds *.exl *.dwg *.fdf *.pcl *.wmf *.wps *. fpage *.odtff *.cas *.ldl *.wm
*.m4p *.dex *.3g2 *.sss *.xyz.

I. Color. For any non-native documents, production will be in color where color is material to the understanding of the document or parts thereof (e.g., pie and bar charts) or documents that need to be produced in color can be produced in native format. Otherwise, non-native document images may be produced in black and white.

J. De-duplication. A party is only required to produce a single copy of a responsive document and shall deduplicate responsive ESI (based on MD5 or SHA-1 hash values at the document level) across custodians. De-duplication of emails shall occur at the family level, such that documents that are attachments to a non-duplicative email shall not be eliminated as duplicates of responsive ESI. For the avoidance of doubt, all unique content will be produced after the de-duplication is processed. Attachments should not be eliminated as duplicates for purposes of production, unless all documents within a family, such as the parent e-mail and all attachments, are also exact duplicates. In addition, hard copy documents shall not be eliminated as duplicates of responsive ESI. In addition, if deduplication is performed, the identity of the other custodians of deduplicated items must be listed in the “All Custodians” Metadata field of the copy of the single record that is produced.

K. Attachments. If any original ESI has attachments or hyperlinked documents, the Parties will produce copies of that ESI with the attachments or hyperlinked documents (if technologically feasible to do so on a systematic basis)—even if copies of attachments have been produced as part of a different family group—unless the attachment itself is determined to be privileged or exceptioned (*i.e.*, the attachment is corrupted or a Non-Convertible File-type as set forth in Section V.E) during processing. If a producing Party represents that it cannot produce a

hyperlinked document that was attached to the original ESI, upon request of the receiving Party identifying a particular hyperlinked document for production, the producing Party will use best efforts to locate and produce that hyperlinked document (or a version closest in time with that hyperlinked document). The foregoing does not require a Party to produce a hyperlinked document that is otherwise publicly available (*i.e.*, a newspaper article).

L. If any original ESI has attachments, the Parties will produce copies of that ESI with the attachments—even if copies of attachments have been produced as part of a different family group—unless the attachment itself is determined to be privileged or exceptioned (*i.e.*, the attachment is corrupted or a Non-Convertible File-type as set forth in Section V.E) during processing.

M. Parent-Child Relationships. Parent-child relationships (the association between an attachment and its parent document or between embedded documents or linked internal or nonpublic documents and their parents) shall be preserved. Attachments should be consecutively produced with their parent. The Parties agree to meet and confer on a case-by-case basis if a party believes there is a good-faith basis to withhold completely non-responsive documents attached to an otherwise production-eligible document, and instead, produce those documents as a single-page Bates-stamped TIFF image slipsheet containing the text the document has been withheld as nonresponsive.

N. Preservation of Native Files. When ESI is produced, the producing Party will retain an unmodified original Native File copy.

O. Encryption. The producing Party shall encrypt all Production Data. Such encryption should only be implemented in a manner that would not preclude the reasonable use of ESI. Encryption should be applied using BitLocker or a comparable software or via hardware

encryption using hardware-encrypted drives. The producing Party shall transmit the encryption key or password to the receiving Party, under separate cover, contemporaneously with sending the encrypted media.

P. Chain of Custody. The producing Party shall ship encrypted media and/or data electronically via FTP transfer (or the like), or physically via deliver service (e.g., FedEx and UPS) and provide tracking numbers for all shipments to ensure proper chain of custody.

Q. Archived Materials. Absent a showing by the receiving Party of circumstances whereby the need for such ESI substantially outweighs the burden associated with recovering it and that no other source for such ESI is otherwise available, the Parties shall not be required to search Back-Up Tapes and Data or other Back-Up, archived, or disaster recovery systems. To the extent either Party determines that responsive information is only contained on Back-Up Tapes and Data, the Parties will meet and confer in good faith to exchange information about the Back-Up Tapes and Data in their possession, when such Back-Up Tapes and Data were created (and/or most recently re-written), and what potentially relevant information they contain. For purposes of this Section, “Back-Up Tapes and Data” means data duplicated in any electronic backup system for the purpose of system recovery or information restoration, including but not limited to, system recovery backup tapes, continuity of operations systems, and data or system mirrors or shadows, if such data are routinely purged, overwritten or otherwise made not reasonably accessible in accordance with an established routine system maintenance policy.

VI. BATES LABELING / CONFIDENTIALITY DESIGNATIONS

A. Labeling. Each page of all images produced (whether Documents or ESI) must be clearly labeled with an indelible, legible, unique Bates number identifier electronically “burned” onto the image. Reasonable steps shall be taken to place the Bates number at a location that does

not obscure any information from the source document. In addition, to the extent any image or file is to be marked confidential, each page of the image or file to be marked confidential shall include the appropriate confidentiality designation as determined in the Proposed Protective Order, filed on March 29, 2024, and separately entered into by the Parties. There shall be no other legend or stamp placed on the document image, with the exception of redacted information due to claims of applicable privileges.

B. Consecutive Numbering. The Parties agree that a convention on Bates number ordering will help the Parties better organize production of Documents and ESI in this Action. Therefore, to the extent possible, Documents and ESI shall be Bates-numbered consecutively by custodian (source), maintaining all parent-child relationships. Document numbers for documents produced by the Parties shall identify the Party's name and shall be in the format "Party Name-00000001."

C. File Names. Image file names must be unique and must correspond with the Bates number imprinted on the image. For example, if the Bates number "B0000001" was imprinted, the image would bear the name "B0000001.tif."

D. Authenticity. No Party shall object that Documents or ESI produced pursuant to this Stipulation are not authentic based upon the file-naming convention described in Section V.C, above. The Parties otherwise reserve all rights regarding their ability to object to the authenticity of Documents or ESI, including the inherent unreliability of Metadata.

E. Native Files. If Native Files are produced, the Party producing such Native File shall include a single-image placeholder TIFF with a single Bates number on the image itself. As stated above, the slipsheet for each native Excel file will include the text "File Produced In Native Format" along with the corresponding File name, Bates number, and confidentiality designation.

The Native File shall not be renamed, but rather will be linked to the placeholder TIFF and the Bates number assigned thereto. There shall be no Bates numbering of Native Files at the page level.

VII. PRIVILEGE AND REDACTIONS

A. Privilege Log. Privilege logs shall be produced in spreadsheet native format. The Parties agree that the following categories of Documents and ESI need not be identified on a privilege log: (i) all communications and attorney work product exchanged between counsel (including in-house counsel and counsel of record in this Action) and their respective clients since August 1, 2023; and (ii) all communications between an in-house attorney or counsel of record and their respective clients concerning scheduling, logistical, and/or other non-substantive or ministerial matters.

B. In an effort to avoid unnecessary expense and burden, the Parties agree that, for documents redacted or withheld from production on the basis of attorney-client privilege, work product doctrine and/or any other applicable privilege, the producing Party will provide a log or logs by no later than twenty-one (21) days after the date agreed upon by the Parties for completion of document production containing the following information:

1. a sequential number associated with each privilege log record (*i.e.*, a privilege log ID number);
2. the beginning and ending Bates number of the document, if applicable;
3. identify the nature of the privilege (including work product) that is being claimed;
4. the type of document, *e.g.*, letter or memorandum;
5. a description of the general subject matter of the document;

6. the date of the document;
7. the custodian of the document;
8. the author of the document, the addressees of the document, and any other recipients (including “cc” and “bcc” recipients); and
9. where not apparent, the relationship of the author, addressees, and recipients to each other when necessary to evaluate the claim of privilege (e.g., identifying the attorney when the attorney-client privilege is claimed).

If the receiving Party requires further information, it shall explain in writing the need for such information and identify, by Bates number or other unique identifier, each document for which it seeks this information. Within fourteen (14) days of such a request, the producing Party must either (i) provide the requested information or (ii) challenge the request. If a Party challenges a request for further information, the Parties shall meet and confer within three (3) business days to try to reach a mutually agreeable solution. If they cannot agree, the Parties must request a conference with the Court before any motions may be filed.

C. Group Privilege Entries: Further, the Parties recognize that there may be a limited number of instances where there are categories or groups of Documents or ESI in which all items are privileged and that, because of the large number of individual items in such a category or group, it would be a great burden to separately identify on a privilege log each individual Document or item of ESI included in that group. The Parties agree that in such instances, which are intended to occur only in narrow circumstances, in accordance with THE SEDONA PRINCIPLES: BEST PRACTICES, RECOMMENDATIONS & PRINCIPLES FOR ADDRESSING ELECTRONIC DOCUMENT PRODUCTION, comment 3(d) of 2018 ed., and as appropriate, instead of separately identifying each Document or item of ESI on its privilege log, it may instead identify

categories or groups of privileged Documents or privileged ESI. In so doing, the Party shall describe in its privilege log the category or group of privileged Documents or ESI (including, without limitation, the criteria and method of delimiting the category or group), the factual basis for a reasonable belief that all Documents or ESI in the category or group are privileged, and the legal basis for the assertion of a privilege as to all Documents or ESI in the category or group. Additionally, if a Party requests further information relating to a category or group identified on another Party's privilege log, such information shall be provided so that the receiving Party has sufficient information to determine whether or not to challenge the privilege claim. The ultimate adjudication of challenged privilege claims shall be made on the basis of a document-by-document review.

D. Redactions. If the producing Party is redacting information from a page, the producing Party shall electronically "burn" the word "Redacted" onto the page at the location of the redaction(s) and include Metadata reflecting that the document has been redacted (*i.e.*, "Redacted").

E. Native File Redactions. Producing Parties shall undertake reasonable efforts to produce native documents in redacted form consistent with the principles contained in this Stipulation. Spreadsheets which require redaction may be redacted as outlined in Section V.D, or redacted in their native format using a tool such as Blackout by Milyli.

Appendix A: ESI Metadata and Coding Fields

Field Name¹	Populated For (<i>Email, Edoc, Calendar, Contact, Cellphone, or All</i>)	Field Description
BegBates	All	Control Numbers.
EndBates	All	Control Numbers.
BegAttach	All	Control Numbers (First production Bates number of the first document of the family).
EndAttach	All	Control Numbers (Last production Bates number of the last document of the family).
Custodian	All	Custodian name (ex. John Doe).
DupCust, CustodianOther, or CustodianAll	All	All custodians who were in possession of a de-duplicated document besides the individual identified in the “Custodian” field.
LogicalPath	All ESI Items	The directory structure of the original file(s). Any container name is included in the path.
Hash Value	All	The MD5 or SHA-1 hash value.
NativeFile	All	Native File Link.
To	Email	All recipients that were included on the “To” line of the email.
From	Email	The name and email address of the sender of the email.
CC	Email	All recipients that were included on the “CC” line of the email.
BCC	Email	All recipients that were included on the “BCC” line of the email.
EmailSubject	Email	Subject line of email.
DateSent	Email	Date email was sent.
DateMod	Email, Edoc	Date the document was modified.
TimeSent	Email	Time email was sent.
TimeZoneUsed	All	Time zone used to process data during document collection and processing.
ReceiveDate	Email	Date email was received.
ReceiveTime	Email	Time email was received.
Email Thread ID	Email	Unique identification number that permits threading of email conversations. For instance, unique MS Outlook identification number (“PR_CONVERSATION_INDEX”) is 22 bytes in length, followed by zero or more child blocks each 5 bytes in length, that facilitate use of email threading.

¹ Field Names can vary from system to system and even between different versions of systems. Thus, Parties are to be guided by these Field Names and Field Descriptions when identifying the Metadata fields to be produced for a given document pursuant to this ESI Protocol.

Field Name¹	Populated For (<i>Email, Edoc, Calendar, Contact, Cellphone, or All</i>)	Field Description
Email Thread Group	Email	Initial nine characters of the Email Threading ID. This value is the same for all members of an Email Thread Group which are all of the replies, forwards, and attachments following an initial sent email.
DateCreated	Edoc	Date the document was created.
FileName	Email, Edoc	File name of the edoc or email.
DocExt	All	File extension of the document.
Title	Edoc	Any value populated in the Title field of the document properties.
Subject	Edoc	Any value populated in the Subject field of the document properties.
Author	Edoc	Any value populated in the Author field of the document properties.
Redacted	All	“X,” “Y,” “Yes,” and “True” are all acceptable indicators that the document is redacted. Otherwise, blank.
Confidentiality	All	Indicates if document has been designated as “Confidential” or “Confidential-Attorney’s Eyes Only” under the Protective Order.
Page Count	All	Indicates the number of pages within the document
Production Volume	All	Indicates the Production Volume Name

* * *

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

Dated: May 6, 2024

/s/ Erin Green Comite

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