

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

ELECTRICAL MEDICAL TRUST and  
PLUMBERS LOCAL UNION NO. 68  
WELFARE FUND,

Plaintiffs,

v.

U.S. ANESTHESIA PARTNERS, INC.,  
U.S. ANESTHESIA PARTNERS  
HOLDINGS, INC., and U.S. ANESTHESIA  
PARTNERS OF TEXAS, P.A.,

Defendants.

Civil Case No. 4:23-cv-04398

**PLAINTIFFS' MOTION FOR LEAVE TO FILE  
PLAINTIFFS' OPPOSITION TO DEFENDANTS  
U.S. ANESTHESIA PARTNERS HOLDINGS,  
INC. AND U.S. ANESTHESIA PARTNERS OF  
TEXAS, P.A.'S MOTION TO DISMISS THE  
AMENDED COMPLAINT AND  
ACCOMPANYING EXHIBITS TEMPORARILY  
UNDER SEAL**

Hon. Alfred H. Bennett

Plaintiffs Electrical Medical Trust and Plumbers Local Union No. 68 Welfare Fund, through their counsel, move this Court for an Order allowing them to file Plaintiffs' Opposition to Defendants U.S. Anesthesia Partners Holdings, Inc. and U.S. Anesthesia Partners of Texas, P.A.'s Motion to Dismiss the Amended Complaint, which reflects information designated CONFIDENTIAL or HIGHLY CONFIDENTIAL, temporarily under seal. Plaintiffs also move to file Exhibits A through H to the Declaration of Brendan Glackin filed in support of Plaintiffs' opposition brief, which also reflect information designated CONFIDENTIAL or HIGHLY CONFIDENTIAL, temporarily under seal. Plaintiffs move to provide Defendants U.S. Anesthesia Partners Holdings, Inc., U.S. Anesthesia Partners, Inc., and U.S. Anesthesia Partners of Texas, P.A. and nonparty insurers fourteen days to provide a basis for maintaining that CONFIDENTIAL or HIGHLY CONFIDENTIAL information under seal pursuant to the Protective Order (ECF No. 94).

1. Pursuant to Administrative Procedure for Electronic Filing in Civil and Criminal Cases 6.B.2, “[i]n unsealed civil cases, Filing Users may electronically file any document under seal, subject to paragraph 6.E,” which provides that the “presiding Judge may order the sealing or unsealing of any document.”

2. Plaintiffs have concurrently filed an unredacted version of their opposition under seal because it reflects information designated CONFIDENTIAL or HIGHLY CONFIDENTIAL. The under-seal version includes highlights over the text that plaintiffs have redacted from the public copy.

3. Plaintiffs have also concurrently filed a public version of their opposition with references to materials designated CONFIDENTIAL or HIGHLY CONFIDENTIAL redacted.

4. Additionally, Plaintiffs have concurrently filed Exhibits A through H to the Declaration of Brendan Glackin under seal because they are documents designated CONFIDENTIAL or HIGHLY CONFIDENTIAL.

5. Plaintiffs have also concurrently filed public cover sheets in connection with their redacted opposition denoting that the corresponding exhibit was filed under seal.

Dated: June 27, 2025      Respectfully submitted,

By: /s/Brendan P. Glackin

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**CERTIFICATE OF SERVICE**

I certify that the foregoing was duly served upon all Counsel of record on June 27, 2025.

By: /s/ Brendan P. Glackin