

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN**

TIARA YACHTS, INC.,

Plaintiff,

v.

BLUE CROSS BLUE SHIELD OF MICHIGAN,

Defendant.

Civil Action No.: 1:22-cv-603

Judge: Hon. Robert J. Jonker

Magistrate Judge: Ray Kent

ORAL ARGUMENT REQUESTED

**BCBSM'S RESPONSE TO PLAINTIFF'S MOTION TO STRIKE CONFIDENTIALITY
DESIGNATIONS ON PLAINTIFF'S DOCUMENT PRODUCTIONS**

CONCISE STATEMENT OF ISSUE PRESENTED

Should Defendant Blue Cross Blue Shield of Michigan (“BCBSM”) be required to remove confidentiality designations that it has properly asserted at the discovery stage?

BCBSM says: No.

Plaintiff says: Yes.

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I. INTRODUCTION

Plaintiff's motion to strike BCBSM's confidentiality designations is based on a fundamental error: Plaintiff insists that the Court should analyze BCBSM's confidentiality designations based on the standard that applies to filing sealed documents that are necessary for adjudicating substantive issues. But this case is still in the discovery phase. It is not clear at this point what issues the Court will ultimately need to adjudicate, much less which documents will be necessary to make its decisions. Courts have long recognized that the confidentiality standards applied during the discovery stage are less stringent than those at the adjudication stage. The Court should reject Plaintiff's attempt to bulldoze this distinction.

Under the correct standard, BCBSM's confidentiality designations are appropriate. To be clear at the outset, while BCBSM originally included confidentiality designations on most of the documents it produced, it has since removed those designations from nearly half of them. Plaintiff conveniently ignores this fact, which makes its motion difficult to respond to. Indeed, at several points in its briefing, Plaintiff spends significant amounts of space arguing about confidentiality designations that BCBSM has *already removed*. The Court should reject Plaintiff's attempt to litigate moot issues. BCBSM's confidentiality designations are proper and should be upheld.

II. BACKGROUND

To date, BCBSM has produced 979 documents over several different productions. Most were initially tagged "Confidential" under the protective order the Court entered on January 13, 2026, ECF No. 123. These designations were made in good faith and with good cause. BCBSM has an extensive history of litigating with Plaintiff's counsel. A Westlaw docket search for (Varnum AND "Blue Cross") results in more than 200 hits, primarily in the U.S. District Court for the

Eastern District of Michigan, in which Plaintiff's counsel has been lead counsel against BCBSM over the past 20 years.

Throughout this history, Plaintiff's counsel has regularly used documents produced in one case as a source for new clients and lawsuits. For example, several of the exhibits attached to Plaintiff's Complaint in this case came from a prior case. And in another instance, Plaintiff's counsel sued the United States Department of Labor to get access to BCBSM customer information. *Varnum LLP v. United States Dep't of Lab.*, No. 1:18-cv-1156, 2021 WL 1387773 (W.D. Mich. Mar. 15, 2021). Specifically, Plaintiff's counsel improperly attempted to obtain "disclosure of settlement information between Blue Cross Blue Shield of Michigan (BCBSM) and certain Administrative Service Only (ASO) clients." A court in the Western District of Michigan denied its request. *Id.* at *7. BCBSM therefore rightfully exercises caution in producing documents to Plaintiff's counsel, particularly considering the inherently sensitive nature of the medical and technical information contained in the documents that BCBSM has in its possession.

Plaintiff emailed BCBSM on May 29, 2026 and stated: "I plan to challenge BCBSM's blanket confidentiality designations. Do you want an opportunity to voluntarily de-designate anything before that happens?" (Ex. A, 05.29.26 Email to BCBSM Counsel). BCBSM responded on June 4, 2026 that it would de-designate documents as to which the confidentiality designation had been removed in a prior case. (Ex. B, 06.04.26 Prior Litig. De-Designation Email). A total of 32 documents were de-designated by that agreement, based on a list of previously de-designated documents *that Plaintiff's counsel provided*. (Ex. C, List of De-Designations Based on Prior Litig.). BCBSM also stated that it would "consider de-designations of other documents that you believe should not be marked confidential." (Ex. B, 06.04.26 Email). Further, BCBSM asked

whether, under the protective order, Plaintiff would “provide us a list by Bates number of the documents that you think should not be marked confidential.” *Id.*

Plaintiff responded on June 8, 2026 that it believed the confidentiality designation should be removed as to “all of” the documents BCBSM has produced. (Ex. D, 06.08.26 Total Removal Email). BCBSM responded on June 12, 2026 that Plaintiffs’ “request that we remove the Confidentiality tag on the entire production is unreasonable.” (Ex. E, 06.12.26 De-Designation Email). BCBSM also pointed out a factual inaccuracy in Plaintiff’s request: by the time Plaintiff sent its June 8 email, BCBSM had already removed confidentiality designations on 32 of the produced documents, as described above. *Id.* BCBSM stated further that it would voluntarily de-designate documents in three categories and follow up with a Bates-numbered list of the documents contained in those categories. *Id.*

On Friday, June 19, in addition to making the final production of documents from BCBSM’s custodial search, BCBSM provided the list of documents it has agreed to de-designate. While Plaintiff describes this as a designation of only “certain narrow categories,” ECF No. 155, PageID.2401, the total number of documents de-designated was about 400. (Ex. F, Second De-Designation List). Rather than respond to BCBSM’s de-designations, Plaintiff elected to file this motion on the following Monday, June 22. ECF No. 154, 155. Had Plaintiff waited to file its motion until it had a chance to review BCBSM’s list of voluntary de-designations, it would have been forced to remove several specific references in its motion. But Plaintiff chose rhetoric over accuracy.

Plaintiff has presented 11 documents to the Court as exemplars of what it believes to be improper confidentiality designations. (Plaintiff’s Attachment A, Submitted by Letter to Court on 06.24.26). Of those exemplars, five—BCBSM-Tiara_000944-963; BCBSM-Tiara_01210-1217;

BCBSM-Tiara_001610-1613; BCBSM-Tiara_001826; and BCBSM-Tiara_001861-1863—have *already* been de-designated by BCBSM.

Three others—BCBSM-Tiara_001172-1177; BCBSM-Tiara_001209; and BCBSM-Tiara_001599—were not included on the list of documents that *Plaintiff provided to BCBSM* when it requested that BCBSM remove the confidentiality designations on documents that had been de-designated in a prior case. Thus, as to these documents, Plaintiff takes issue not with BCBSM’s confidentiality designations, but its *own request* to BCBSM.

That leaves only three exemplar documents that are even arguably in dispute here. Those documents have been appropriately tagged as confidential.

III. ANALYSIS

A. **Plaintiff’s failure to engage in good faith discussions regarding de-designation is a violation of the protective order.**

As a preliminary matter, Plaintiff’s filing of this motion without engaging in good-faith discussions about BCBSM’s confidentiality designations violates the Court’s protective order.

Under the protective order:

If any Party reasonably and in good faith believes that any particular document or other material is not properly subject to the confidentiality designation assigned to it, or should not be subject to this Protective Order, that Party must notify the designating Protected Person in writing and provide a description of the disputed material by Bates number or deposition witness/page/line, and a concise statement of the basis for the challenge, and serve copies of such notice to all other Parties.

ECF No. 123, PageID.1966. After that, the protected person “must advise whether it will withdraw some or all of the challenged documents,” and counsel “must confer in good faith in an effort to resolve any dispute concerning the designation.” *Id.*

As detailed above, Plaintiff’s communications to BCBSM about confidentiality did not comply with its obligations under the protective order. When Plaintiff asked BCBSM whether it

would remove any of its confidentiality designations, BCBSM requested a list of documents by Bates number that Plaintiff believed should be de-designated, as required under the protective order. Plaintiff responded that it believed *all* of BCBSM's confidentiality designations should be removed, despite that BCBSM had already voluntarily removed confidentiality designations on some of the documents. BCBSM then voluntarily removed confidentiality designations on nearly half of the documents in its productions. But rather than engage with BCBSM's good-faith attempts to resolve Plaintiff's confidentiality objections, Plaintiff filed this motion before reviewing BCBSM's de-designation list in any substantive manner. This is a failure to comply with the Court's protective order, and the Court should deny Plaintiff's motion on that basis alone.

B. Plaintiff asks the Court to rely on the wrong confidentiality standard.

In addition to its violation of the Court's protective order, the standard by which Plaintiff requests the Court to test BCBSM's confidentiality designations is improper at this stage. Plaintiff contends that "the propriety of Blue Cross's confidentiality designations is properly measured against the backdrop of the exacting standards that govern sealing of court records." ECF No. 155, PageID.2395. Plaintiff contends that there is therefore a presumption against confidentiality and that the burden to overcome it is onerous. (ECF No. 155, PageID.2395). This misconstrues Sixth Circuit precedent.

As at least one court in this district has noted, applying Sixth Circuit precedent, "[s]ecrecy is fine at the discovery stage, before the material enters the judicial record." *Gale v. Intex Recreation Corp.*, No. 1:23-cv-621, 2025 WL 3901281, at *1 (W.D. Mich. Oct. 23, 2025) (quoting *Shane Grp., Inc. v. Blue Cross Blue Shield of Mich.*, 825 F.3d 299, 305), *aff'd* 825 F.3d 299 (6th Cir. 2016); *see also Baxter Int'l, Inc. v. Abbott Labs.*, 297 F.3d 544, 545 (7th Cir. 2002). Because of this, "a district court may enter a protective order limiting the use or disclosure of discovery

materials upon a mere showing of ‘good cause.’” *Id.* “These orders are often blanket in nature, and allow the parties to determine in the first instance whether particular materials fall within the order’s protection.” *Shane Grp.*, 825 F.3d at 305. This contrasts with the protections available at the “adjudication stage,” since “[t]he public has an interest in ascertaining what evidence and records” courts rely upon in making decisions. *Id.*

Courts within the Sixth Circuit regularly apply this distinction in deciding confidentiality issues at the discovery stage rather than the merits stage. As a court in the Eastern District of Michigan has recognized, based on *Shane Group*, there is no need to apply a presumption against sealing when only discovery motions are before the Court. *Counts v. Gen. Motors LLC*, No. 1:16-12541, 2019 WL 5288044 (E.D. Mich. Oct. 18, 2019). The *Counts* court refused to apply a presumption against sealing because the motion at issue merely “sought additional time for discovery and did not address any adjudicative question related to the merits of the case.” *Id.* at *2; see also *In re Envision Healthcare Corp. Sec. Litig.*, No. No.3:17-cv-01112, 2021 WL 4391622 at *2 (M.D. Tenn. Sept. 24, 2021) (“In contrast to the briefing on the Plaintiff’s motion to certify class, the Court finds that the public interest in the discovery dispute to be minimal and outweighed by the parties’ interest in shielding from view specific information addressed by the parties’ protective order.”).

Unsurprisingly, Plaintiff has not submitted any substantial basis for analyzing the confidentiality designations here under the standard for adjudicative motions. There are six months of discovery remaining and seven months left until the parties must file dispositive motions. Moreover, there have only been two depositions taken so far, neither party has issued an expert report, there are discovery requests and a third-party subpoena outstanding, and neither the nature of the claims at issue nor their monetary value is clear. There is nothing at this stage for the Court

to adjudicate. BCBSM has appropriately marked documents confidential at the discovery stage, and the Court should reject Plaintiff's premature attempt to move beyond discovery.

C. As demonstrated by the three exemplar documents in dispute, BCBSM's confidentiality designations are appropriate.

The three exemplar confidentiality designations that Plaintiff challenges are appropriate. The first is BCBSM-Tiara_002047, which is an email thread related to medical services provided to a representative of Plaintiff. The thread falls squarely within the definition of Protected Health Information ("PHI") covered by the Protective Order. *See* ECF No. 123, PageID.1958 (defining PHI in part as "individually identifiable health information, including demographic information, relating to . . . the provision of health care to an individual"). Plaintiff flippantly describes this as a "routine billing inquiry that Blue Cross sent to Tiara Yachts in the ordinary course of business" (ECF No. 155, PageID.2398).

But as a "covered entity" under HIPAA, BCBSM is required to maintain the confidentiality of Personal Identifiable Information ("PII") and PHI. HIPAA imposes strict requirements on covered entities as to how they must transmit electronically stored health information, requiring that such records be produced subject to an appropriate protective order. 42 C.F.R. pt. 2; 45 C.F.R. §§ 164.512(e)(1)(ii)(B). Inadvertent disclosure requires costly follow-up work for BCBSM, including clawing back all disclosed PII and PHI and notifying its customers that their information has been compromised. 45 C.F.R. §§ 164.400-414. Thus, while Plaintiff may be comfortable taking a cavalier attitude toward PHI, BCBSM is not.

BCBSM-Tiara_004208-4211 and BCBSM-Tiara_004236-4238 are email threads between members of an internal BCBSM workgroup discussing their research on issues related to identifying and correcting fraudulent claims made by out-of-state non-participating healthcare providers. The threads include discussions about potential changes to BCBSM's claims processing

systems in connection with those fraud concerns. The protective order defines confidentiality, in part, as any “confidential research, development, or commercial information, as such terms are used in Federal Rule of Civil Procedure 26(c)(1)(G).” Thus, both emails at issue contain precisely the type of commercially sensitive information that the parties’ protective order is meant to cover. *See, e.g., MedCity Rehab. Servs., LLC v. State Farm Mut. Auto. Ins. Co.*, No. 11-cv-14777, 2013 WL 1875980 (E.D. Mich. May 3, 2013) (extending confidentiality protection to claims handling manuals and information related to “billing procedures, practices, codes, manuals, policies and procedures regarding medical/physical therapy insurance”).

In short, the confidentiality designations on these exemplar documents are appropriate, and there is no basis for BCBSM to remove them. And given Plaintiff’s burden under the protective order to identify disputed confidentiality designations by Bates number, there are no other confidentiality issues for the Court to consider with respect to Plaintiff’s motion. *Aghabekyan v. Knight*, No. 1:25-cv-497, 2026 WL 1458895, at *1 (W.D. Mich. Jan. 30, 2026) (“It is not the function of the Court to create legal arguments”).

D. Plaintiff cannot show prejudice based on the existence of the protective order.

Plaintiff’s attempt to demonstrate “prejudice” is without merit. Plaintiff complains that it is required to obtain signatures and maintain those signatures in a database before sharing confidential information with third parties. (ECF No. 155, PageID.2401-02). Plaintiff also complains that it must “file separate motions to seal each time it needs to reference any of Blue Cross’s documents in a court filing.” *Id.*

But Plaintiff *stipulated* to the Protective Order that it now deems onerous. Plus, virtually all confidentiality orders contain similar restrictions, and the regularity with which such orders are entered indicates that courts have rejected these concerns wholesale—if Plaintiff’s concerns were

valid, there would be no more protective orders. Plaintiff's concerns about having to file documents under seal also remain premature at this early stage. And most significantly, neither of the minor inconveniences Plaintiff complains about can outweigh the confidentiality concerns that BCBSM has properly identified and that the Court's protective order was entered to address.

IV. CONCLUSION

BCBSM's confidentiality designations are appropriate at the discovery stage, and BCBSM respectfully requests that the Court deny Plaintiff's motion.

Respectfully submitted,

ALLEN OVERY SHEARMAN STERLING US LLP

By: s/ Daniel Lewis

Daniel Lewis (Adm. in W.D. MI, NY Reg. 4084810)
Jeffrey D. Hoschander (Adm. in W.D. MI, NY Reg. 4496337)
599 Lexington Avenue
New York, NY 10022
Telephone: +1.212.848.4000
Facsimile: +1.202.508.8100
daniel.lewis@aoshearman.com
jeff.hoschander@aoshearman.com

Todd M. Stenerson (P51953)
1101 New York Avenue, NW
Washington, DC 20005
Telephone: +1.202.508.8093
Facsimile: +1.202.661.7484
todd.stenerson@aoshearman.com

ZAUSMER, P.C.

By: s/ Mark J. Zausmer

Mark J. Zausmer (P31721)
Michael A. Schwartz (P74361)
Nathan S. Scherbarth (P75647)
Jason M. Schneider (P79296)
32255 Northwestern Hwy., Ste. 225
Farmington Hills, MI 48334

Telephone: +1.248.851.4111

Facsimile: +1.248.851.0100

mzausmer@zausmer.com

mschwartz@zausmer.com

nscherbarth@zausmer.com

jschneider@zausmer.com

Attorneys for Defendant

Dated: July 6, 2026

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- Exhibit A.** 05.29.26 Email to BCBSM Counsel
- Exhibit B.** 06.04.26 Prior Litig. De-Designation Email
- Exhibit C.** List of De-Designations Based on Prior Litig.
- Exhibit D.** 06.08.26 Total Removal Email
- Exhibit E.** 06.12.26 De-Designation Email
- Exhibit F.** Second De-Designation List

EXHIBIT A

Jason M. Schneider

From: Rynders, Perrin <prynders@varnumlaw.com>
Sent: Friday, May 29, 2026 1:06 PM
To: Jason M. Schneider
Cc: Selvius, Gage M.; Phillips, Isabella B.; Phelps, Aaron M.; Mark J. Zausmer; Lewis, Daniel
Subject: RE: Tiara v. BCBSM - Proposed Discovery Extension

[EXTERNAL EMAIL]

While I consider your proposal, let me address a few related details, the answers to which might affect my response:

1. Regarding the flip logic issue, my expectation is that BCBSM should easily and quickly answer our questions. I don't understand the delay and would like some insight into that. Also, what about my suggestion of having a BCBSM employee who understands this issue talk directly to our expert(s) to avoid potential problems with translation between technical novices such as us?
2. We have re-sent the Bodman spreadsheet and cover letter addressing the de-designation of numerous Comau documents that, when produced again in this matter, were marked as confidential. Is there any reason to not de-designate the same documents without further delay?
3. My understanding is that we will be getting BCBSM's largest production today. Are we on track for that? And how much do you believe will be left to produce after that?
4. More generally about confidentiality designations, I previously pointed out as just one example a document that was created for external distribution but nevertheless marked as confidential. Obviously, that designation was improper. BCBSM has also marked as confidential such non-confidential documents as routine contract documents. Such documents have often been used in my litigation against BCBSM without being designated as confidential or requiring submission to the court under seal. I plan to challenge BCBSM's blanket confidentiality designations. Do you want an opportunity to voluntarily de-designate anything before that happens?
5. I'm still waiting for information about how BCBSM filtered documents that met all search criteria (which I don't accept as proper, but we agreed to take up once your initial production is complete). What can you tell me regarding that?

From: Jason M. Schneider <JSchneider@zausmer.com>
Sent: Friday, May 29, 2026 11:19 AM
To: Rynders, Perrin <prynders@varnumlaw.com>
Cc: Selvius, Gage M. <gmselvius@varnumlaw.com>; Phillips, Isabella B. <ibphillips@varnumlaw.com>; Mark J. Zausmer <MZausmer@zausmer.com>; Lewis, Daniel <daniel.lewis@aoshearman.com>
Subject: Tiara v. BCBSM - Proposed Discovery Extension

Perrin,

BCBSM is still tracking down information in response to the flip-logic issues you raised with the claims data. We are aware that the expert report deadline is coming up, and that these issues will impact Tiara's and BCBSM's ability to submit timely expert reports.

As such, we think it would be appropriate to extend the current scheduling order deadlines.

A draft stipulation and order is attached. Let us know if you agree to submitting this for entry.

Best,

Jason M. Schneider

Shareholder



ATTORNEYS & COUNSELORS

32255 Northwestern Highway, Suite 225

Farmington Hills, MI 48334

Direct: (248) 254-4849

This email and any attachments may be privileged or confidential. If you are not the intended recipient, please delete the email and any attachments and notify us immediately.

EXHIBIT B

Jason M. Schneider

From: Jason M. Schneider
Sent: Thursday, June 4, 2026 3:33 PM
To: Rynders, Perrin
Cc: Selvius, Gage M.; Mark J. Zausmer; Lewis, Daniel
Subject: Tiara - Confidentiality Designations

Perrin,

Following up on our discussions about de-designating documents that are currently marked confidential, we agree to de-designate the documents from the Comau population that were previously de-designated.

Additionally, we will consider de-designations of other documents that you believe should not be marked confidential. Pursuant to Paragraph C(4) of the protective order (ECF No. 122), could you please provide us a list by Bates number of the documents you think should not be marked confidential?

Best,

Jason M. Schneider

Shareholder

Zausmer 

ATTORNEYS & COUNSELORS

32255 Northwestern Highway, Suite 225

Farmington Hills, MI 48334

Direct: (248) 254-4849

This email and any attachments may be privileged or confidential. If you are not the intended recipient, please delete the email and any attachments and notify us immediately.

EXHIBIT C

Comau Beginning Bates Number	Comau End Bates Number	Tiara Beginning Bates Number	Tiara End Bates Number2
BCBSM-Comau 00001560	BCBSM-Comau 00001566	BCBSM-Tiara_000311	BCBSM-Tiara_000311
BCBSM-Comau 00001567	BCBSM-Comau 00001589	BCBSM-Tiara_000318	BCBSM-Tiara_000318
BCBSM-Comau 00001590	BCBSM-Comau 00001605	BCBSM-Tiara_000341	BCBSM-Tiara_000341
BCBSM-Comau 00001606	BCBSM-Comau 00001606	BCBSM-Tiara_000357	BCBSM-Tiara_000357
BCBSM-Comau 00001607	BCBSM-Comau 00001616	BCBSM-Tiara_000358	BCBSM-Tiara_000358
BCBSM-Comau 00001620	BCBSM-Comau 00001635	BCBSM-Tiara_000371	BCBSM-Tiara_000371
BCBSM-Comau 00001676	BCBSM-Comau 00001793	BCBSM-Tiara_000427	BCBSM-Tiara_000427
BCBSM-Comau 00001794	BCBSM-Comau 00001795	BCBSM-Tiara_000545	BCBSM-Tiara_000545
BCBSM-Comau 00001796	BCBSM-Comau 00001799	BCBSM-Tiara_000547	BCBSM-Tiara_000547
BCBSM-Comau 00001920	BCBSM-Comau 00001922	BCBSM-Tiara_000671	BCBSM-Tiara_000671
BCBSM-Comau 00001923	BCBSM-Comau 00001945	BCBSM-Tiara_000674	BCBSM-Tiara_000674
BCBSM-Comau 00001946	BCBSM-Comau 00001949	BCBSM-Tiara_000697	BCBSM-Tiara_000697
BCBSM-Comau 00001955	BCBSM-Comau 00001957	BCBSM-Tiara_000706	BCBSM-Tiara_000706
BCBSM-Comau 00002048	BCBSM-Comau 00002054	BCBSM-Tiara_000799	BCBSM-Tiara_000799
BCBSM-Comau 00002072	BCBSM-Comau 00002085	BCBSM-Tiara_000823	BCBSM-Tiara_000823
BCBSM-Comau 00002145	BCBSM-Comau 00002150	BCBSM-Tiara_000896	BCBSM-Tiara_000896
BCBSM-Comau 00002169	BCBSM-Comau 00002181	BCBSM-Tiara_000920	BCBSM-Tiara_000920
BCBSM-Comau 00002182	BCBSM-Comau 00002185	BCBSM-Tiara_000933	BCBSM-Tiara_000933
BCBSM-Comau 00002190	BCBSM-Comau 00002192	BCBSM-Tiara_000941	BCBSM-Tiara_000941
BCBSM-Comau 00002193	BCBSM-Comau 00002212	BCBSM-Tiara_000944	BCBSM-Tiara_000944
BCBSM-Comau 00002216	BCBSM-Comau 00002230	BCBSM-Tiara_000967	BCBSM-Tiara_000967
BCBSM-Comau 00002258	BCBSM-Comau 00002348	BCBSM-Tiara_001009	BCBSM-Tiara_001009
BCBSM-Comau 00018033	BCBSM-Comau 00018038	BCBSM-Tiara_001135	BCBSM-Tiara_001135
BCBSM-Comau 00019552	BCBSM-Comau 00019656	BCBSM-Tiara_001188	BCBSM-Tiara_001188
BCBSM-Comau 00019659	BCBSM-Comau 00019762	BCBSM-Tiara_001193	BCBSM-Tiara_001193
BCBSM-Comau 00019835	BCBSM-Comau 00019842	BCBSM-Tiara_001210	BCBSM-Tiara_001210
BCBSM-Comau 00029035	BCBSM-Comau 00029046	BCBSM-Tiara_001353	BCBSM-Tiara_001353
BCBSM-Comau 00029066	BCBSM-Comau 00029066	BCBSM-Tiara_001384	BCBSM-Tiara_001384
BCBSM-Comau 00029290	BCBSM-Comau 00029291	BCBSM-Tiara_001608	BCBSM-Tiara_001608
BCBSM-Comau 00029292	BCBSM-Comau 00029295	BCBSM-Tiara_001610	BCBSM-Tiara_001610
BCBSM-Comau 00029305	BCBSM-Comau 00029309	BCBSM-Tiara_001614	BCBSM-Tiara_001614
BCBSM-Comau 00029315	BCBSM-Comau 00029317	BCBSM-Tiara_001624	BCBSM-Tiara_001624

EXHIBIT D

Jason M. Schneider

From: Selvius, Gage M. <gmselvius@varnumlaw.com>
Sent: Monday, June 8, 2026 9:21 PM
To: Jason M. Schneider; Rynders, Perrin
Cc: Phillips, Isabella B.; Phelps, Aaron M.; Hofman, Herman D.; Mark J. Zausmer
Subject: RE: Tiara v. BCBSM - Proposed Discovery Extension
Attachments: Proposed Amended Scheduling Order(29242172.1).pdf

[EXTERNAL EMAIL]

Jason,

The list of Bates numbered documents that were improperly designated “confidential” is all of them: BCBSM-Tiara 000001— BCBSM-Tiara 004513. Federal Rule 26(c) protects “a trade secret or other confidential research, development, or commercial information.” You marked every single document in your production “confidential.” On our review, not a single document contains “a trade secret or other confidential research, development, or commercial information.” Similarly, the redactions in your production are inappropriate. You have not provided a privilege log for your redactions. We do not concede that anything in your production is or could be properly designated as privileged, but it is readily apparent that essentially all of your redactions are not even arguably privileged information. We intend to file a motion to de-designate your confidential designations and to compel production of unredacted documents. As a compromise, we would allow you fix your production by removing the confidential designations and redacting only customer names. Once you redact customer names, those documents should not be marked as “confidential.” Please confirm that you will agree to these terms and reproduce the documents accordingly this week, or we will proceed with our motion.

Please provide an update regarding the date by which we will receive the remaining document production. We are now almost a month and a half past the date by which you stipulated that BCBSM would make a “substantial” production of documents, and you have made only a partial, improperly-redacted and mis-designated production of approximately 800 documents.

We still do not have an answer from you explaining your flip-logic analysis. You have identified two data fields that allegedly can be used to identify flip-logic claims: PARTICIPATING_STATUS_CD and ITS_PROV_CLASSIFICATION. We have two simple, fundamental questions: 1) What are the inputs in these two fields that, when read together, indicate that the claim was subject to flip-logic? 2) What is BCBSM’s position regarding which claims that were subject to flip-logic in the Tiara data? These questions are included in our interrogatories, which you have not adequately responded to. We will renew our motion to compel supplemental interrogatory responses if we do not get a full straight answer on this issue this week.

We are going to depose Paul Ozdarski, Dianne Malmgren, and Robert Hopper. Please provide a list of available dates for these depositions. If we do not have a list of their availability this week, we will set the depositions at a date and time convenient for our office.

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approach this extension. We intend to file a motion with the attached proposed schedule as an exhibit. Our proposed schedule primarily tracks with the dates outlined in your proposed stipulation, with two exceptions: first, we will try complete our expert report before the September 28 deadline, and we will provide our report to you once it is ready (rather than wait until the deadline). That allows us to move the case forward if your expert report deadline is tied to the date we actually provide our report. We thus propose that your expert report deadline be 30 days after the date we provide our expert report (i.e., if we provide our expert report July 28, your report would be due August 27; if we provide our expert report September 1, your report would be due October 1; if our report is not complete until the September 28 deadline in the proposed order, your report would be due October 28). We hope that this proposal will quell any concerns the Court may have regarding the length of the proposed extension. Given your offer to stipulate, we presume that you will concur in the relief sought and we intend to inform the Court that the motion is unopposed. Please let us know of any objections to that.

Second, we adjusted the deadline to conduct ADR from the end of January to mid-December, before the holidays. To that end, we have not yet agreed on a mediator in this case. We propose Lee Silver, but are open to suggestions. When we last spoke with Lee (in an unrelated matter), he had dates available in November and December, but that was about a week ago. We should agree on a mediator and get a date scheduled for the mediation promptly so that we can ensure we are able to reserve a date on the mediator's calendar.

Gage

VARNUM

Varnum LLP
333 Bridge Street NW, Suite 1700
Grand Rapids, Michigan 49504
varnumlaw.com

Gage M. Selvius
Associate

Direct: 616-336-6731
Email: gmselvius@varnumlaw.com



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From: Jason M. Schneider <JSchneider@zausmer.com>

Sent: Friday, May 29, 2026 1:38 PM

To: Rynders, Perrin <prynders@varnumlaw.com>

Cc: Selvius, Gage M. <gmselvius@varnumlaw.com>; Phillips, Isabella B. <ibphillips@varnumlaw.com>; Phelps, Aaron M. <amphelps@varnumlaw.com>; Mark J. Zausmer <MZausmer@zausmer.com>; Lewis, Daniel <daniel.lewis@aoshearman.com>

Subject: RE: Tiara v. BCBSM - Proposed Discovery Extension

Perrin,

Responses to each of your questions:

1. My understanding from BCBSM is that the two fields we identified previously are the correct fields for identifying claims impacted by flip logic. That said, as I mentioned before, there is a technical issue with the calculation that BCBSM is trying to figure out. This is taking some time. I will provide more information as soon as I have it.

2. I have not had a chance to review the Comau spreadsheet yet. Aiming to get back to you next week on that.
3. As I mentioned on our last call, there will not be a production today. The re-production diverted resources from reviewing the remaining documents, and we will need a couple more weeks (which I also mentioned on our previous call but inadvertently did not include in the follow-up email on 5/19). I am not sure about the size of the production. You will note that the re-production included more documents than the initial one. I thought those would be part of the second production rather than the re-production.
4. As part of reviewing the Comau de-designations, we are going to consider de-designations of non-Comau documents. The Comau spreadsheet will be helpful as an analogy, and we've noted the documents you mentioned below as well.
5. We have considered this request. We examined documents collected from the custodians and search terms that you have a copy of and identified documents responsive to Tiara's RFPs "that relate or apply to Tiara Yachts, even if Tiara Yachts is not specifically mentioned in the documents, without date limitation," as stated in the stipulation on April 14. Beyond that description, the manner of the search we conducted is attorney work product.

Best,

Jason M. Schneider

Shareholder

Zausmer 

ATTORNEYS & COUNSELORS

32255 Northwestern Highway, Suite 225

Farmington Hills, MI 48334

Direct: (248) 254-4849

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From: Rynders, Perrin <prynders@varnumlaw.com>

Sent: Friday, May 29, 2026 1:06 PM

To: Jason M. Schneider <JSchneider@zausmer.com>

Cc: Selvius, Gage M. <gmselvius@varnumlaw.com>; Phillips, Isabella B. <ibphillips@varnumlaw.com>; Phelps, Aaron M. <amphelps@varnumlaw.com>; Mark J. Zausmer <MZausmer@zausmer.com>; Lewis, Daniel <daniel.lewis@aoshearman.com>

Subject: RE: Tiara v. BCBSM - Proposed Discovery Extension

[EXTERNAL EMAIL]

While I consider your proposal, let me address a few related details, the answers to which might affect my response:

1. Regarding the flip logic issue, my expectation is that BCBSM should easily and quickly answer our questions. I don't understand the delay and would like some insight into that. Also, what about my suggestion of having a BCBSM employee who understands this issue talk directly to our expert(s) to avoid potential problems with translation between technical novices such as us?

2. We have re-sent the Bodman spreadsheet and cover letter addressing the de-designation of numerous Comau documents that, when produced again in this matter, were marked as confidential. Is there any reason to not de-designate the same documents without further delay?
3. My understanding is that we will be getting BCBSM's largest production today. Are we on track for that? And how much do you believe will be left to produce after that?
4. More generally about confidentiality designations, I previously pointed out as just one example a document that was created for external distribution but nevertheless marked as confidential. Obviously, that designation was improper. BCBSM has also marked as confidential such non-confidential documents as routine contract documents. Such documents have often been used in my litigation against BCBSM without being designated as confidential or requiring submission to the court under seal. I plan to challenge BCBSM's blanket confidentiality designations. Do you want an opportunity to voluntarily de-designate anything before that happens?
5. I'm still waiting for information about how BCBSM filtered documents that met all search criteria (which I don't accept as proper, but we agreed to take up once your initial production is complete). What can you tell me regarding that?

From: Jason M. Schneider <JSchneider@zausmer.com>

Sent: Friday, May 29, 2026 11:19 AM

To: Rynders, Perrin <prynders@varnumlaw.com>

Cc: Selvius, Gage M. <gmselvius@varnumlaw.com>; Phillips, Isabella B. <ibphillips@varnumlaw.com>; Mark J. Zausmer <MZausmer@zausmer.com>; Lewis, Daniel <daniel.lewis@aoshearman.com>

Subject: Tiara v. BCBSM - Proposed Discovery Extension

Perrin,

BCBSM is still tracking down information in response to the flip-logic issues you raised with the claims data. We are aware that the expert report deadline is coming up, and that these issues will impact Tiara's and BCBSM's ability to submit timely expert reports.

As such, we think it would be appropriate to extend the current scheduling order deadlines.

A draft stipulation and order is attached. Let us know if you agree to submitting this for entry.

Best,

Jason M. Schneider

Shareholder

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EXHIBIT E

Jason M. Schneider

From: Jason M. Schneider
Sent: Friday, June 12, 2026 4:52 PM
To: 'Selvius, Gage M.'; Rynders, Perrin
Cc: Phillips, Isabella B.; Phelps, Aaron M.; Hofman, Herman D.; Mark J. Zausmer; Lewis, Daniel
Subject: RE: Tiara v. BCBSM - Proposed Discovery Extension

Gage,

Our responses to the issues you raised below are as follows:

- 1) Confidentiality: Your request that we remove the Confidentiality tag on the entire production is unreasonable. There is also an underlying factual inaccuracy: we have already de-designated specific documents from the *Comau* production based on the list that you provided. As you know, your own request for de-designations of that document population did not encompass all the *Comau* documents.

That said, there are certain categories of documents that we will voluntarily de-designate: (1) S2 contract documents (ASCs, amendments, BDDs, etc.); (2) internal documents and communications related to Tiara's termination and settlement; and (3) external communications with S2 and Advantage Benefits. We will send you a list with Bates numbers as soon as possible.

- 2) Redactions: The redactions are appropriate. None of the redacted information is relevant to Tiara Yachts. All of it relates to other BCBSM customers. This was the same approach taken in *Comau*.

Indeed, your office has already, at least implicitly, agreed with this approach. In re-producing the *Comau* documents, you agreed certain spreadsheets that had all customer information except Comau's would be withheld, and that those same spreadsheets would instead be produced with all but S2's information redacted. Those spreadsheets have been re-produced in this exact manner. This agreed approach is the one taken with the broader population.

- 3) Next Production: We will make our next production by next Friday, June 19. Our April 30 production was a "substantial production of the documents [BCBSM] has already collected through its internal custodial search." The May 22 re-production was a supplement. The next production will be a complete or near-complete production of the responsive documents from this population. I do not think it will be a significant increase in the number of documents.
- 4) Flip Logic: We should have a response on this next week. I can assure you that this is not a matter of anyone dragging their feet. The issue is being actively worked on.
- 5) Depositions: We have reached out to Paul Ozdarski, Dianne Malmgren, and Robert Hopper. We do not have dates from them yet, but we should have them to you next week.
- 6) Mediation: We should have an answer on this next week as well. We are cognizant that Lee Silver books out pretty far in advance.

Best,

Jason M. Schneider

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From: Selvius, Gage M. <gmselvius@varnumlaw.com>

Sent: Monday, June 8, 2026 9:21 PM

To: Jason M. Schneider <JSchneider@zausmer.com>; Rynders, Perrin <prynders@varnumlaw.com>

Cc: Phillips, Isabella B. <ibphillips@varnumlaw.com>; Phelps, Aaron M. <amphelps@varnumlaw.com>; Hofman, Herman D. <hdhofman@varnumlaw.com>; Mark J. Zausmer <MZausmer@zausmer.com>

Subject: RE: Tiara v. BCBSM - Proposed Discovery Extension

[EXTERNAL EMAIL]

Jason,

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Gage

VARNUM

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Grand Rapids, Michigan 49504
varnumlaw.com

Gage M. Selvius
Associate

Direct: 616-336-6731
Email: gmselvius@varnumlaw.com



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From: Jason M. Schneider <JSchneider@zausmer.com>

Sent: Friday, May 29, 2026 1:38 PM

To: Rynders, Perrin <prynders@varnumlaw.com>

Cc: Selvius, Gage M. <gmselvius@varnumlaw.com>; Phillips, Isabella B. <ibphillips@varnumlaw.com>; Phelps, Aaron M. <amphelps@varnumlaw.com>; Mark J. Zausmer <MZausmer@zausmer.com>; Lewis, Daniel

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Responses to each of your questions:

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<daniel.lewis@aoshearman.com>

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EXHIBIT F

Production::Begin Bates	Production::End Bates
BCBSM-Tiara_000001	BCBSM-Tiara_000001
BCBSM-Tiara_000002	BCBSM-Tiara_000002
BCBSM-Tiara_000003	BCBSM-Tiara_000004
BCBSM-Tiara_000005	BCBSM-Tiara_000006
BCBSM-Tiara_000007	BCBSM-Tiara_000007
BCBSM-Tiara_000008	BCBSM-Tiara_000008
BCBSM-Tiara_000009	BCBSM-Tiara_000009
BCBSM-Tiara_000010	BCBSM-Tiara_000012
BCBSM-Tiara_000013	BCBSM-Tiara_000016
BCBSM-Tiara_000017	BCBSM-Tiara_000031
BCBSM-Tiara_000032	BCBSM-Tiara_000033
BCBSM-Tiara_000034	BCBSM-Tiara_000034
BCBSM-Tiara_000035	BCBSM-Tiara_000036
BCBSM-Tiara_000037	BCBSM-Tiara_000037
BCBSM-Tiara_000038	BCBSM-Tiara_000039
BCBSM-Tiara_000040	BCBSM-Tiara_000040
BCBSM-Tiara_000041	BCBSM-Tiara_000041
BCBSM-Tiara_000042	BCBSM-Tiara_000042
BCBSM-Tiara_000043	BCBSM-Tiara_000043
BCBSM-Tiara_000044	BCBSM-Tiara_000044
BCBSM-Tiara_000045	BCBSM-Tiara_000047
BCBSM-Tiara_000048	BCBSM-Tiara_000050
BCBSM-Tiara_000051	BCBSM-Tiara_000053
BCBSM-Tiara_000054	BCBSM-Tiara_000056
BCBSM-Tiara_000057	BCBSM-Tiara_000059
BCBSM-Tiara_000060	BCBSM-Tiara_000062
BCBSM-Tiara_000063	BCBSM-Tiara_000065
BCBSM-Tiara_000066	BCBSM-Tiara_000068
BCBSM-Tiara_000069	BCBSM-Tiara_000070
BCBSM-Tiara_000071	BCBSM-Tiara_000071
BCBSM-Tiara_000072	BCBSM-Tiara_000087
BCBSM-Tiara_000088	BCBSM-Tiara_000092
BCBSM-Tiara_000093	BCBSM-Tiara_000097
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BCBSM-Tiara_000109	BCBSM-Tiara_000112
BCBSM-Tiara_000113	BCBSM-Tiara_000114
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BCBSM-Tiara_000116	BCBSM-Tiara_000127
BCBSM-Tiara_000128	BCBSM-Tiara_000132

BCBSM-Tiara_000133	BCBSM-Tiara_000148
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BCBSM-Tiara_000153	BCBSM-Tiara_000153
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BCBSM-Tiara_000158	BCBSM-Tiara_000159
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BCBSM-Tiara_000162	BCBSM-Tiara_000163
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BCBSM-Tiara_000174	BCBSM-Tiara_000178
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BCBSM-Tiara_000229	BCBSM-Tiara_000230
BCBSM-Tiara_000231	BCBSM-Tiara_000246
BCBSM-Tiara_000247	BCBSM-Tiara_000251
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