

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

_____)	
UNITED STATES OF AMERICA)	
<i>ex rel.</i> ANDREW SHEA,)	
)	
Plaintiff,)	
)	Civil Action No. 21-cv-11777-DJC
v.)	
)	
eHEALTH, INC., et al.,)	
)	
Defendants.)	
_____)	

**ELEVANCE HEALTH, INC.’S ANSWER TO COMPLAINT IN PARTIAL
INTERVENTION OF THE UNITED STATES OF AMERICA**

Defendant Elevance Health, Inc. (“Elevance Health”) hereby answers the United States of America’s (“Plaintiff”) Complaint in Partial Intervention (“Complaint”) as follows.

Under the Heading “Preliminary Statement”¹

The allegations in this section contain a summary of Plaintiff’s claims and legal conclusions to which no response is required. To the extent that this section may be construed as containing factual allegations against Elevance Health that require a response, Elevance Health denies the allegations contained in this section. Elevance Health further lacks information sufficient to form a belief about the truth of the allegations contained in this section as they relate to other Defendants and therefore denies them.

¹ Elevance Health states that the headings and subheadings of the Complaint do not constitute well-pleaded allegations of fact and therefore require no response. To the extent any response is required, Elevance Health denies the allegations in the headings and subheadings of the Complaint.

Under the Heading “Jurisdiction and Venue”

1. Paragraph 1 consists of legal conclusions to which no response is required. To the extent a response is required, Elevance Health admits this Court has jurisdiction over this action.

2. Paragraph 2 consists of legal conclusions to which no response is required. To the extent a response is required, Elevance Health denies this Court may exercise personal jurisdiction over it, and denies that it enrolled Medicare beneficiaries in Massachusetts through the Defendant Brokers. Elevance Health lacks information sufficient to form a belief about the truth of the allegations in Paragraph 2 insofar as they relate to other Defendants. Elevance Health denies the remaining allegations in Paragraph 2.

3. Paragraph 3 consists of legal conclusions to which no response is required. To the extent a response is required, Elevance Health admits this Court has venue over this action.

Under the Heading “Parties”

Under the Heading “Plaintiff and Relator”

4. Elevance Health admits Plaintiff is the United States of America. The remaining allegations in Paragraph 4 consist of legal conclusions to which no response is required.

5. Elevance Health admits Relator filed an action in this Court on behalf of himself and the United States. The remaining allegations in the second sentence of Paragraph 5 consist of legal conclusions and characterizations to which no response is required. Elevance Health lacks information sufficient to form a belief about the truth of the remaining allegations in Paragraph 5.

Under the Heading “Defendants”

6. Elevance Health lacks information sufficient to form a belief about the truth of the allegations in Paragraph 6.

7. Elevance Health lacks information sufficient to form a belief about the truth of the allegations in Paragraph 7.

8. Elevance Health lacks information sufficient to form a belief about the truth of the allegations in Paragraph 8.

9. Elevance Health admits that Elevance Health, Inc. is an Indiana corporation headquartered in Indianapolis, Indiana, that it was previously known as Anthem, Inc, and that it directly or through subsidiaries markets, sells, and operates health insurance plans, including within the Medicare Advantage program.

10. Elevance Health lacks information sufficient to form a belief about the truth of the allegations in Paragraph 10.

11. Elevance Health lacks information sufficient to form a belief about the truth of the allegations in Paragraph 11.

12. Elevance Health lacks information sufficient to form a belief about the truth of the allegations in Paragraph 12.

13. Elevance Health lacks information sufficient to form a belief about the truth of the allegations in Paragraph 13.

14. Elevance Health lacks information sufficient to form a belief about the truth of the allegations in Paragraph 14.

Under the Heading “Legal Framework and Industry Background”

Under the Heading “The False Claims Act”

15. The allegations in Paragraph 15 are legal conclusions and characterizations by Plaintiff to which no response is required. To the extent a response is required, Elevance Health denies the allegations in Paragraph 15 to the extent they are inconsistent with, or are Plaintiff’s interpretation of, the False Claims Act.

16. The allegations in Paragraph 16 are legal conclusions and characterizations by Plaintiff to which no response is required. To the extent a response is required, Elevance Health

denies the allegations in Paragraph 16 to the extent they are inconsistent with, or are Plaintiff's interpretation of, the False Claims Act.

17. The allegations in Paragraph 17 are legal conclusions and characterizations by Plaintiff to which no response is required. To the extent a response is required, Elevance Health denies the allegations in Paragraph 17 to the extent they are inconsistent with, or are Plaintiff's interpretation of, the False Claims Act.

18. The allegations in Paragraph 18 are legal conclusions and characterizations by Plaintiff to which no response is required. To the extent a response is required, Elevance Health denies the allegations in Paragraph 18 to the extent they are inconsistent with, or are Plaintiff's interpretation of, the False Claims Act.

19. The allegations in Paragraph 19 are legal conclusions and characterizations by Plaintiff to which no response is required. To the extent a response is required, Elevance Health denies the allegations in Paragraph 19 to the extent they are inconsistent with, or are Plaintiff's interpretation of, the False Claims Act.

20. The allegations in Paragraph 20 are legal conclusions and characterizations by Plaintiff to which no response is required. To the extent a response is required, Elevance Health denies the allegations in Paragraph 20 to the extent they are inconsistent with, or are Plaintiff's interpretation of, the False Claims Act or federal regulations.

Under the Heading "The Anti-Kickback Statute"

21. The allegations in Paragraph 21 are legal conclusions and characterizations by Plaintiff to which no response is required. To the extent a response is required, Elevance Health denies the allegations in Paragraph 21 to the extent they are inconsistent with, or are Plaintiff's interpretation of, the Anti-Kickback Statute.

22. The allegations in Paragraph 22 are legal conclusions and characterizations by Plaintiff to which no response is required. To the extent a response is required, Elevance Health denies the allegations in Paragraph 22 to the extent they are inconsistent with, or are Plaintiff's interpretation of, the Anti-Kickback Statute.

23. The allegations in Paragraph 23 are legal conclusions and characterizations by Plaintiff to which no response is required. To the extent a response is required, Elevance Health denies the allegations in Paragraph 23 to the extent they are inconsistent with, or are Plaintiff's interpretation of, the Anti-Kickback Statute.

24. The allegations in Paragraph 24 are legal conclusions and characterizations by Plaintiff to which no response is required. To the extent a response is required, Elevance Health denies the allegations in Paragraph 24 to the extent they are inconsistent with, or are Plaintiff's interpretation of, the Anti-Kickback Statute.

25. The allegations in Paragraph 25 are legal conclusions and characterizations by Plaintiff to which no response is required. To the extent a response is required, Elevance Health denies the allegations in Paragraph 25 to the extent they are inconsistent with, or are Plaintiff's interpretation of, the Anti-Kickback Statute.

26. The allegations in Paragraph 26 are legal conclusions and characterizations by Plaintiff to which no response is required. To the extent a response is required, Elevance Health denies the allegations in Paragraph 26 to the extent they are inconsistent with, or are Plaintiff's interpretation of, the Anti-Kickback Statute, and specifically denies Plaintiff's interpretation of the AKS.

27. The allegations in Paragraph 27 are legal conclusions and characterizations by Plaintiff to which no response is required. To the extent a response is required, Elevance Health

denies the allegations in Paragraph 27 to the extent they are inconsistent with, or are Plaintiff's interpretation of, the Anti-Kickback Statute, and specifically denies Plaintiff's interpretation that the Medicare program, including the Medicare Advantage program, is a "Federal health care program" under the AKS.

28. The allegations in Paragraph 28 are legal conclusions and characterizations by Plaintiff to which no response is required. To the extent a response is required, Elevance Health denies the allegations in Paragraph 28 to the extent they are inconsistent with, or are Plaintiff's interpretation of, the Anti-Kickback Statute, and specifically denies Plaintiff's interpretation of the AKS.

29. The allegations in Paragraph 29 are legal conclusions and characterizations by Plaintiff to which no response is required. To the extent a response is required, Elevance Health denies the allegations in Paragraph 29 to the extent they are inconsistent with, or are Plaintiff's interpretation of, the Anti-Kickback Statute or case law interpreting the same, and specifically denies Plaintiff's interpretation of the AKS or case law.

30. The allegations in Paragraph 30 are legal conclusions and characterizations by Plaintiff to which no response is required. To the extent a response is required, Elevance Health denies the allegations in Paragraph 30 to the extent they are inconsistent with, or are Plaintiff's interpretation of, the Anti-Kickback Statute, and specifically denies Plaintiff's interpretation of the AKS.

31. The allegations in Paragraph 31 are legal conclusions and characterizations by Plaintiff to which no response is required. To the extent a response is required, Elevance Health denies the allegations in Paragraph 31 to the extent they are inconsistent with, or are Plaintiff's

interpretation of, the Anti-Kickback Statute and case law interpreting the same, and specifically denies Plaintiff's interpretation of the AKS and case law.

32. The allegations in Paragraph 32 are legal conclusions and characterizations by Plaintiff to which no response is required. To the extent a response is required, Elevance Health denies the allegations in Paragraph 32 to the extent they are inconsistent with, or are Plaintiff's interpretation of, the Anti-Kickback Statute and case law interpreting the same, and specifically denies Plaintiff's interpretation of the AKS and case law.

33. Elevance Health lacks information sufficient to form a belief about the truth of the allegations in Paragraph 33.

Under the Heading "Medicare"

34. Admitted.

35. Admitted.

36. Admitted.

Under the Heading "Overview of Medicare Advantage"

37. Admitted.

38. Elevance Health lacks information sufficient to form a belief about the truth of the allegations in Paragraph 38.

39. Admitted.

40. Elevance Health admits it operates as an MAO and has offered multiple MA plans. Elevance Health lacks information sufficient to form a belief about the truth of the remaining allegations in Paragraph 40.

41. The allegations in Paragraph 41 are characterizations by Plaintiff to which no response is required. To the extent a response is required, Elevance Health denies the allegations

to the extent they are inconsistent with, or are Plaintiff's interpretation of, CMS and Medicare Advantage statutes and regulations.

42. The allegations in Paragraph 42 are characterizations by Plaintiff to which no response is required. To the extent a response is required, Elevance Health denies the allegations to the extent they are inconsistent with, or are Plaintiff's interpretation of, CMS and Medicare Advantage statutes and regulations.

43. The allegations in Paragraph 43 are legal conclusions and characterizations by Plaintiff to which no response is required. To the extent a response is required, Elevance Health denies the allegations to the extent they are inconsistent with, or are Plaintiff's interpretation of, CMS and Medicare Advantage statutes and regulations.

44. The allegations in Paragraph 44 are legal conclusions and characterizations by Plaintiff to which no response is required. To the extent a response is required, Elevance Health denies the allegations to the extent they are inconsistent with, or are Plaintiff's interpretation of, CMS and Medicare Advantage statutes and regulations.

45. The allegations in Paragraph 45 are legal conclusions and characterizations by Plaintiff to which no response is required. To the extent a response is required, Elevance Health denies the allegations to the extent they are inconsistent with, or are Plaintiff's interpretation of, CMS and Medicare Advantage statutes and regulations.

46. The allegations in Paragraph 46 are legal conclusions and characterizations by Plaintiff to which no response is required. To the extent a response is required, Elevance Health denies the allegations to the extent they are inconsistent with, or are Plaintiff's interpretation of, CMS and Medicare Advantage statutes and regulations.

47. The allegations in Paragraph 47 are legal conclusions and characterizations by Plaintiff to which no response is required. To the extent a response is required, Elevance Health denies the allegations to the extent they are inconsistent with, or are Plaintiff's interpretation of, CMS and Medicare Advantage statutes and regulations.

48. The allegations in Paragraph 48 are legal conclusions and characterizations by Plaintiff to which no response is required. To the extent a response is required, Elevance Health denies the allegations to the extent they are inconsistent with, or are Plaintiff's interpretation of, CMS and Medicare Advantage statutes and regulations.

49. The allegations in Paragraph 49 are legal conclusions and characterizations by Plaintiff to which no response is required. To the extent a response is required, Elevance Health denies the allegations to the extent they are inconsistent with, or are Plaintiff's interpretation of, CMS and Medicare Advantage statutes and regulations.

50. The allegations in Paragraph 50 are legal conclusions and characterizations by Plaintiff to which no response is required. To the extent a response is required, Elevance Health denies the allegations to the extent they are inconsistent with, or are Plaintiff's interpretation of, CMS and Medicare Advantage statutes and regulations.

51. The allegations in Paragraph 51 are legal conclusions and characterizations by Plaintiff to which no response is required. To the extent a response is required, Elevance Health denies the allegations to the extent they are inconsistent with, or are Plaintiff's interpretation of, CMS and Medicare Advantage statutes and regulations.

Under the Heading "Broker Operations Within Medicare Advantage"

52. Admitted.

52. Elevance Health admits that it works with internal agents that it employs to sell its MA plans, and also works with third-party marketing organizations to market and sell certain of

its MA plans. Unless otherwise admitted, Elevance Health denies the remaining allegations in Paragraph 53.

53. Elevance Health admits that it understands that independent brokers utilize marketing material for their business operations. Elevance Health lacks information sufficient to form a belief about the truth of the remaining allegations in Paragraph 54 insofar as they relate to the conduct of entities other than Elevance Health, and therefore denies them. Elevance Health denies the remaining allegations in Paragraph 54.

54. Elevance Health admits that it understood Defendant Broker business operations to include marketing that was not specific to a particular MAO. Elevance Health lacks information sufficient to form a belief about the truth of the remaining allegations in Paragraph 55.

55. Elevance Health admits that it understands some of the enrollments it obtained from its engagement with Defendant Brokers resulted from carrier-neutral advertisements. Elevance Health lacks information sufficient to form a belief about the truth of the remaining allegations in Paragraph 56.

56. Elevance Health lacks information sufficient to form a belief about the truth of the allegations in Paragraph 57.

57. Elevance Health admits that it understood that some of its engagements with Defendant Brokers included both phone and online based sales. Elevance Health lacks information sufficient to form a belief about the truth of the allegations in Paragraph 58.

58. Elevance Health lacks information sufficient to form a belief about the truth of the allegations in Paragraph 59.

59. Elevance Health lacks information sufficient to form a belief about the truth of the allegations in Paragraph 60.

60. Elevance Health lacks information sufficient to form a belief about the truth of the allegations in Paragraph 61 insofar as they relate to eHealth, and therefore denies them. Elevance Health denies the remaining allegations in Paragraph 61.

61. Elevance Health lacks information sufficient to form a belief about the truth of the allegations in Paragraph 62 insofar as they relate to eHealth, and therefore denies them. Elevance Health denies the remaining allegations in Paragraph 62.

62. Elevance Health lacks information sufficient to form a belief about the truth of the allegations in Paragraph 63 insofar as they relate to GoHealth, and therefore denies them. Elevance Health denies the remaining allegations in Paragraph 63.

63. Elevance Health lacks information sufficient to form a belief about the truth of the allegations in Paragraph 64 insofar as they relate to GoHealth, and therefore denies them. Elevance Health denies the remaining allegations in Paragraph 64.

64. Elevance Health lacks information sufficient to form a belief about the truth of the allegations in Paragraph 65 insofar as they relate to GoHealth, and therefore denies them. Elevance Health denies the remaining allegations in Paragraph 65.

65. Elevance Health lacks information sufficient to form a belief about the truth of the allegations in Paragraph 66.

66. The allegations in Paragraph 67 are legal conclusions and characterizations by Plaintiff to which no response is required or contains allegations for which Elevance Health lacks sufficient information to form a belief about the truth of the allegations. To the extent a response is required, Elevance Health denies the allegations to the extent they are inconsistent with, or are Plaintiff's interpretation of, CMS and Medicare Advantage statutes and regulations.

67. Elevance Health lacks information sufficient to form a belief about the truth of the allegations in Paragraph 68.

68. Elevance Health lacks information sufficient to form a belief about the truth of the allegations in Paragraph 69.

69. Elevance Health lacks information sufficient to form a belief about the truth of the allegations in Paragraph 70.

70. Elevance Health lacks information sufficient to form a belief about the truth of the allegations in Paragraph 71.

71. Elevance Health lacks information sufficient to form a belief about the truth of the allegations in Paragraph 72.

72. Elevance Health lacks information sufficient to form a belief about the truth of the allegations in Paragraph 73.

73. Elevance Health lacks information sufficient to form a belief about the truth of the allegations in Paragraph 74.

Under the Heading “Statutes and Regulations Related to Broker Compensation and Payments to Brokers”

74. The allegations in Paragraph 75 are legal conclusions and characterizations by Plaintiff to which no response is required. To the extent a response is required, Elevance Health denies the allegations to the extent they are inconsistent with, or are Plaintiff’s interpretation of, CMS and Medicare Advantage statutes and regulations.

75. The allegations in Paragraph 76 are legal conclusions and characterizations by Plaintiff to which no response is required. To the extent a response is required, Elevance Health denies the allegations to the extent they are inconsistent with, or are Plaintiff’s interpretation of, CMS and Medicare Advantage statutes and regulations.

76. The allegations in Paragraph 77 are legal conclusions and characterizations by Plaintiff to which no response is required. To the extent a response is required, Elevance Health denies the allegations to the extent they are inconsistent with, or are Plaintiff's interpretation of, CMS and Medicare Advantage statutes and regulations, and specifically denies Plaintiff's interpretation of regulations.

77. The allegations in Paragraph 78 are legal conclusions and characterizations by Plaintiff to which no response is required. To the extent a response is required, Elevance Health denies the allegations to the extent they are inconsistent with, or are Plaintiff's interpretation of, CMS and Medicare Advantage statutes and regulations.

78. The allegations in Paragraph 79 are legal conclusions and characterizations by Plaintiff to which no response is required. To the extent a response is required, Elevance Health denies the allegations to the extent they are inconsistent with, or are Plaintiff's interpretation of, CMS and Medicare Advantage statutes and regulations, and specifically denies Plaintiff's interpretation and description of regulations. Elevance Health admits MAOs could pay brokers for administrative services, including marketing payments based on enrollments.

79. The allegations in Paragraph 80 are legal conclusions and characterizations by Plaintiff to which no response is required. To the extent a response is required, Elevance Health denies the allegations to the extent they are inconsistent with, or are Plaintiff's interpretation of, CMS and Medicare Advantage statutes and regulations, and specifically denies Plaintiff's interpretation of regulations.

80. The allegations in Paragraph 81 are legal conclusions and characterizations by Plaintiff to which no response is required. To the extent a response is required, Elevance Health denies the allegations to the extent they are inconsistent with, or are Plaintiff's interpretation of,

CMS and Medicare Advantage statutes and regulations, and specifically denies Plaintiff's interpretation of regulations.

81. The allegations in Paragraph 82 are legal conclusions and characterizations by Plaintiff to which no response is required. To the extent a response is required, Elevance Health denies the allegations to the extent they are inconsistent with, or are Plaintiff's interpretation of, CMS and Medicare Advantage statutes and regulations, and specifically denies Plaintiff's interpretation of regulations.

82. The allegations in Paragraph 83 are legal conclusions and characterizations by Plaintiff to which no response is required. To the extent a response is required, Elevance Health denies the allegations to the extent they are inconsistent with, or are Plaintiff's interpretation of, CMS and Medicare Advantage statutes and regulations, and specifically denies Plaintiff's interpretation of regulations.

Under the Heading "Statutes and Regulations Related to Discrimination Against Disabled Beneficiaries"

83. Paragraph 84 relates to claims alleged against other Defendants, and no response is required from Elevance Health. Answering further, the allegations in Paragraph 84 are also legal conclusions and characterizations by Plaintiff to which no response is required. To the extent a response is required, Elevance Health lacks knowledge or information sufficient to form a belief as to the truth of the allegations concerning other Defendants in Paragraph 84 and therefore denies them. Elevance further denies the allegations to the extent they are inconsistent with, or are Plaintiff's interpretation of, CMS and Medicare Advantage statutes and regulations.

84. Paragraph 85 relates to claims alleged against other Defendants, and no response is required from Elevance Health. Answering further, the allegations in Paragraph 85 are also legal conclusions and characterizations by Plaintiff to which no response is required. To the extent a

response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief as to the truth of the allegations concerning other Defendants in Paragraph 85 and therefore denies them. Elevance further denies the allegations to the extent they are inconsistent with, or are Plaintiff's interpretation of, CMS and Medicare Advantage statutes and regulations.

85. Paragraph 86 relates to claims alleged against other Defendants, and no response is required from Elevance Health. Answering further, the allegations in Paragraph 86 are also legal conclusions and characterizations by Plaintiff to which no response is required. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief as to the truth of the allegations concerning other Defendants in Paragraph 86 and therefore denies them. Elevance further denies the allegations to the extent they are inconsistent with, or are Plaintiff's interpretation of, CMS and Medicare Advantage statutes and regulations.

86. Paragraph 87 relates to claims alleged against other Defendants, and no response is required from Elevance Health. Answering further, the allegations in Paragraph 87 are also legal conclusions and characterizations by Plaintiff to which no response is required. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief as to the truth of the allegations concerning other Defendants in Paragraph 87 and therefore denies them. Elevance further denies the allegations to the extent they are inconsistent with, or are Plaintiff's interpretation of, CMS and Medicare Advantage statutes and regulations.

87. Paragraph 88 relates to claims alleged against other Defendants, and no response is required from Elevance Health. Answering further, the allegations in Paragraph 88 are also legal conclusions and characterizations by Plaintiff to which no response is required. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief as to the truth of the allegations concerning other Defendants in Paragraph 88 and therefore

denies them. Elevance further denies the allegations to the extent they are inconsistent with, or are Plaintiff's interpretation of, CMS and Medicare Advantage statutes and regulations.

88. Paragraph 89 relates to claims alleged against other Defendants, and no response is required from Elevance Health. Answering further, the allegations in Paragraph 89 are also legal conclusions and characterizations by Plaintiff to which no response is required. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief as to the truth of the allegations concerning other Defendants in Paragraph 89 and therefore denies them. Elevance further denies the allegations to the extent they are inconsistent with, or are Plaintiff's interpretation of, CMS and Medicare Advantage statutes and regulations.

89. Paragraph 90 relates to claims alleged against other Defendants, and no response is required from Elevance Health. Answering further, the allegations in Paragraph 90 are also legal conclusions and characterizations by Plaintiff to which no response is required. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief as to the truth of the allegations concerning other Defendants in Paragraph 90 and therefore denies them. Elevance further denies the allegations to the extent they are inconsistent with, or are Plaintiff's interpretation of, CMS and Medicare Advantage statutes and regulations.

90. Paragraph 91 relates to claims alleged against other Defendants, and no response is required from Elevance Health. Answering further, the allegations in Paragraph 91 are also legal conclusions and characterizations by Plaintiff to which no response is required. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief as to the truth of the allegations concerning other Defendants in Paragraph 91 and therefore denies them. Elevance further denies the allegations to the extent they are inconsistent with, or are Plaintiff's interpretation of, CMS and Medicare Advantage statutes and regulations.

Under the Heading “Contractual and Claim Requirements for MAOs”

91. The allegations in Paragraph 92 include legal conclusions and characterizations by Plaintiff to which no response is required. To the extent a response is required, Elevance Health admits that it entered into written agreements with CMS for plans it operates and that those agreements were for a one-year term. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 92 insofar as they relate to other Defendants, and therefore denies them. Elevance Health denies the remaining allegations in Paragraph 92.

92. The allegations in Paragraph 93 are legal conclusions and characterizations by Plaintiff to which no response is required. To the extent a response is required, Elevance Health denies the allegations to the extent they are inconsistent with, or are Plaintiff’s interpretation of, CMS and Medicare Advantage statutes and regulations, and specifically denies Plaintiff’s interpretation of regulations.

93. The allegations in Paragraph 94 are legal conclusions and characterizations by Plaintiff to which no response is required. To the extent a response is required, Elevance Health denies the allegations to the extent they are inconsistent with, or are Plaintiff’s interpretation of, CMS and Medicare Advantage statutes and regulations, and specifically denies Plaintiff’s interpretation of regulations.

94. The allegations in Paragraph 95 are legal conclusions and characterizations by Plaintiff to which no response is required. To the extent a response is required, Elevance Health denies the allegations to the extent they are inconsistent with, or are Plaintiff’s interpretation of, CMS and Medicare Advantage statutes and regulations, and specifically denies Plaintiff’s interpretation of regulations.

95. The allegations in Paragraph 96 are legal conclusions and characterizations by Plaintiff to which no response is required. To the extent a response is required, Elevance Health denies the allegations to the extent they are inconsistent with, or are Plaintiff's interpretation of, CMS and Medicare Advantage statutes and regulations, and specifically denies Plaintiff's interpretation of regulations.

96. The allegations in Paragraph 97 are legal conclusions and characterizations by Plaintiff to which no response is required. To the extent a response is required, Elevance Health denies the allegations in Paragraph 97.

Under the Heading "Kickbacks and Discrimination by the Defendant Insurers and Defendant Brokers"

97. Elevance Health lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 98 with respect to other Defendants and therefore denies them. Elevance Health denies the allegations in Paragraph 98 with respect to Elevance Health.

98. Elevance Health lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 99 with respect to other Defendants and therefore denies them. Elevance Health denies the allegations in Paragraph 99 with respect to Elevance Health.

99. Elevance Health lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 100 with respect to other Defendants and therefore denies them. Elevance Health denies the allegations in Paragraph 100 with respect to Elevance Health.

100. Paragraph 101 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 101 and therefore denies them.

101. Elevance Health lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 102 with respect to other Defendants and therefore denies them. Elevance Health denies the allegations in Paragraph 102 with respect to Elevance Health.

Under the Heading “Humana”

Under the Heading “Humana Paid Kickbacks to the Defendant Brokers to Steer Medicare Beneficiaries to Humana Plans and Limit Enrollments in Competitors’ Plans”

102. Paragraph 103 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 103 and therefore denies them.

103. Paragraph 104 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 104 and therefore denies them.

104. Paragraph 105 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 105 and therefore denies them.

105. Paragraph 106 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 106 and therefore denies them.

106. Paragraph 107 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health

lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 107 and therefore denies them.

107. Paragraph 108 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 108 and therefore denies them.

108. Paragraph 109 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 109 and therefore denies them.

109. Paragraph 110 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 110 and therefore denies them.

110. Paragraph 111 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 111 and therefore denies them.

111. Paragraph 112 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 112 and therefore denies them.

112. Paragraph 113 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 113 and therefore denies them.

Under the Heading “Humana’s Kickbacks to GoHealth”

113. Paragraph 114 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 114 and therefore denies them.

114. Paragraph 115 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 115 and therefore denies them.

115. Paragraph 116 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 116 and therefore denies them.

116. Paragraph 117 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 117 and therefore denies them.

117. Paragraph 118 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health

lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 118 and therefore denies them.

118. Paragraph 119 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 119 and therefore denies them.

119. Paragraph 120 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 120 and therefore denies them.

120. Paragraph 121 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 121 and therefore denies them.

121. Paragraph 122 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 122 and therefore denies them.

122. Paragraph 123 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 123 and therefore denies them.

123. Paragraph 124 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 124 and therefore denies them.

124. Paragraph 125 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 125 and therefore denies them.

125. Paragraph 126 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 126 and therefore denies them.

126. Paragraph 127 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 127 and therefore denies them.

127. Paragraph 128 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 128 and therefore denies them.

128. Paragraph 129 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health

lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 129 and therefore denies them.

129. Paragraph 130 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 130 and therefore denies them.

130. Paragraph 131 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 131 and therefore denies them.

131. Paragraph 132 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 132 and therefore denies them.

132. Paragraph 133 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 133 and therefore denies them.

133. Paragraph 134 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 134 and therefore denies them.

134. Paragraph 135 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 135 and therefore denies them.

135. Paragraph 136 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 136 and therefore denies them.

136. Paragraph 137 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 137 and therefore denies them.

137. Paragraph 138 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 138 and therefore denies them.

138. Paragraph 139 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 139 and therefore denies them.

139. Paragraph 140 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health

lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 140 and therefore denies them.

140. Paragraph 141 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 141 and therefore denies them.

141. Paragraph 142 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 142 and therefore denies them.

142. Paragraph 143 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 143 and therefore denies them.

143. Paragraph 144 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 144 and therefore denies them.

144. Paragraph 145 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 145 and therefore denies them.

145. Paragraph 146 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 146 and therefore denies them.

146. Paragraph 147 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 147 and therefore denies them.

147. Paragraph 148 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 148 and therefore denies them.

148. Paragraph 149 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 149 and therefore denies them.

149. Paragraph 150 relates to conduct alleged against other Defendants or to communications to which Elevance Health was not a party, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 150 and therefore denies them.

150. Paragraph 151 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health

lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 151 and therefore denies them.

151. Paragraph 152 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 152 and therefore denies them.

152. Paragraph 153 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 153 and therefore denies them.

153. Paragraph 154 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 154 and therefore denies them.

154. Paragraph 155 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 155 and therefore denies them.

155. Paragraph 156 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 156 and therefore denies them.

156. Paragraph 157 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 157 and therefore denies them.

157. Paragraph 158 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 158 and therefore denies them.

158. Paragraph 159 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 159 and therefore denies them.

159. Paragraph 160 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 160 and therefore denies them.

160. Paragraph 161 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 161 and therefore denies them.

161. Paragraph 162 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health

lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 162 and therefore denies them.

162. Paragraph 163 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 163 and therefore denies them.

163. Paragraph 164 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 164 and therefore denies them.

164. Paragraph 165 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 165 and therefore denies them.

165. Paragraph 166 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 166 and therefore denies them.

166. Paragraph 167 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 167 and therefore denies them.

167. Paragraph 168 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 168 and therefore denies them.

168. Paragraph 169 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 169 and therefore denies them.

169. Paragraph 170 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 170 and therefore denies them.

170. Paragraph 171 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 171 and therefore denies them.

171. Paragraph 172 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 172 and therefore denies them.

172. Paragraph 173 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health

lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 173 and therefore denies them.

173. Paragraph 174 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 174 and therefore denies them.

174. Paragraph 175 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 175 and therefore denies them.

175. Paragraph 176 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 176 and therefore denies them.

176. Paragraph 177 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 177 and therefore denies them.

177. Paragraph 178 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 178 and therefore denies them.

178. Paragraph 179 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 179 and therefore denies them.

179. Paragraph 180 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 180 and therefore denies them.

180. Paragraph 181 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 181 and therefore denies them.

181. Paragraph 182 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 182 and therefore denies them.

182. Paragraph 183 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 183 and therefore denies them.

183. Paragraph 184 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health

lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 184 and therefore denies them.

184. Paragraph 185 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 185 and therefore denies them.

185. Paragraph 186 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 186 and therefore denies them.

186. Paragraph 187 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 187 and therefore denies them.

187. Paragraph 188 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 188 and therefore denies them.

188. Paragraph 189 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 189 and therefore denies them.

189. Paragraph 190 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 190 and therefore denies them.

190. Paragraph 191 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 191 and therefore denies them.

191. Paragraph 192 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 192 and therefore denies them.

192. Paragraph 193 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 193 and therefore denies them.

193. Paragraph 194 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 194 and therefore denies them.

194. Paragraph 195 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health

lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 195 and therefore denies them.

195. Paragraph 196 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 196 and therefore denies them.

196. Paragraph 197 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 197 and therefore denies them.

Under the Heading “Humana’s Kickbacks to SelectQuote”

197. Paragraph 198 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 198 and therefore denies them.

198. Paragraph 199 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 199 and therefore denies them.

199. Paragraph 200 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 200 and therefore denies them.

200. Paragraph 201 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 201 and therefore denies them.

201. Paragraph 202 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 202 and therefore denies them.

202. Paragraph 203 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 203 and therefore denies them.

203. Paragraph 204 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 204 and therefore denies them.

204. Paragraph 205 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 205 and therefore denies them.

205. Paragraph 206 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health

lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 206 and therefore denies them.

206. Paragraph 207 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 207 and therefore denies them.

207. Paragraph 208 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 208 and therefore denies them.

208. Paragraph 209 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 209 and therefore denies them.

209. Paragraph 210 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 210 and therefore denies them.

210. Paragraph 211 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 211 and therefore denies them.

211. Paragraph 212 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 212 and therefore denies them.

212. Paragraph 213 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 213 and therefore denies them.

213. Paragraph 214 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 214 and therefore denies them.

214. Paragraph 215 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 215 and therefore denies them.

215. Paragraph 216 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 216 and therefore denies them.

216. Paragraph 217 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health

lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 217 and therefore denies them.

217. Paragraph 218 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 218 and therefore denies them.

218. Paragraph 219 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 219 and therefore denies them.

219. Paragraph 220 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 220 and therefore denies them.

220. Paragraph 221 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 221 and therefore denies them.

221. Paragraph 222 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 222 and therefore denies them.

222. Paragraph 223 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 223 and therefore denies them.

223. Paragraph 224 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 224 and therefore denies them.

224. Paragraph 225 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 225 and therefore denies them.

225. Paragraph 226 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 226 and therefore denies them.

226. Paragraph 227 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 227 and therefore denies them.

227. Paragraph 228 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health

lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 228 and therefore denies them.

228. Paragraph 229 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 229 and therefore denies them.

229. Paragraph 230 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 230 and therefore denies them.

230. Paragraph 231 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 231 and therefore denies them.

231. Paragraph 232 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 232 and therefore denies them.

232. Paragraph 233 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 233 and therefore denies them.

233. Paragraph 234 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 234 and therefore denies them.

234. Paragraph 235 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 235 and therefore denies them.

235. Paragraph 236 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 236 and therefore denies them.

236. Paragraph 237 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 237 and therefore denies them.

237. Paragraph 238 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 238 and therefore denies them.

238. Paragraph 239 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health

lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 239 and therefore denies them.

239. Paragraph 240 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 240 and therefore denies them.

240. Paragraph 241 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 241 and therefore denies them.

241. Paragraph 242 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 242 and therefore denies them.

242. Paragraph 243 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 243 and therefore denies them.

243. Paragraph 244 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 244 and therefore denies them.

244. Paragraph 245 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 245 and therefore denies them.

245. Paragraph 246 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 246 and therefore denies them.

246. Paragraph 247 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 247 and therefore denies them.

247. Paragraph 248 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 248 and therefore denies them.

248. Paragraph 249 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 249 and therefore denies them.

249. Paragraph 250 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health

lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 250 and therefore denies them.

250. Paragraph 251 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 251 and therefore denies them.

251. Paragraph 252 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 252 and therefore denies them.

252. Paragraph 253 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 253 and therefore denies them.

253. Paragraph 254 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 254 and therefore denies them.

254. Paragraph 255 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 255 and therefore denies them.

255. Paragraph 256 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 256 and therefore denies them.

Under the Heading “Humana’s Kickbacks to eHealth”

256. Paragraph 257 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 257 and therefore denies them.

257. Paragraph 258 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 258 and therefore denies them.

258. Paragraph 259 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 259 and therefore denies them.

259. Paragraph 260 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 260 and therefore denies them.

260. Paragraph 261 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health

lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 261 and therefore denies them.

261. Paragraph 262 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 262 and therefore denies them.

262. Paragraph 263 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 263 and therefore denies them.

263. Paragraph 264 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 264 and therefore denies them.

264. Paragraph 265 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 265 and therefore denies them.

265. Paragraph 266 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 266 and therefore denies them.

266. Paragraph 267 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 267 and therefore denies them.

267. Paragraph 268 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 268 and therefore denies them.

268. Paragraph 269 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 269 and therefore denies them.

269. Paragraph 270 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 270 and therefore denies them.

270. Paragraph 271 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 271 and therefore denies them.

271. Paragraph 272 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health

lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 272 and therefore denies them.

272. Paragraph 273 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 273 and therefore denies them.

273. Paragraph 274 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 274 and therefore denies them.

274. Paragraph 275 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 275 and therefore denies them.

275. Paragraph 276 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 276 and therefore denies them.

276. Paragraph 277 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 277 and therefore denies them.

277. Paragraph 278 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 278 and therefore denies them.

278. Paragraph 279 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 279 and therefore denies them.

279. Paragraph 280 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 280 and therefore denies them.

280. Paragraph 281 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 281 and therefore denies them.

281. Paragraph 282 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 282 and therefore denies them.

282. Paragraph 283 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health

lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 283 and therefore denies them.

283. Paragraph 284 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 284 and therefore denies them.

284. Paragraph 285 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 285 and therefore denies them.

285. Paragraph 286 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 286 and therefore denies them.

286. Paragraph 287 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 287 and therefore denies them.

287. Paragraph 288 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 288 and therefore denies them.

288. Paragraph 289 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 289 and therefore denies them.

289. Paragraph 290 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 290 and therefore denies them.

290. Paragraph 291 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 291 and therefore denies them.

291. Paragraph 292 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 292 and therefore denies them.

292. Paragraph 293 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 293 and therefore denies them.

293. Paragraph 294 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health

lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 294 and therefore denies them.

294. Paragraph 295 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 295 and therefore denies them.

295. Paragraph 296 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 296 and therefore denies them.

296. Paragraph 297 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 297 and therefore denies them.

297. Paragraph 298 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 298 and therefore denies them.

298. Paragraph 299 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 299 and therefore denies them.

299. Paragraph 300 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 300 and therefore denies them.

300. Paragraph 301 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 301 and therefore denies them.

301. Paragraph 302 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 302 and therefore denies them.

302. Paragraph 303 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 303 and therefore denies them.

303. Paragraph 304 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 304 and therefore denies them.

Under the Heading “Humana Conspired with the Defendant Brokers and Others to Discriminate Against Medicare Beneficiaries with Disabilities”

304. Paragraph 305 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health

lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 305 and therefore denies them.

305. Paragraph 306 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 306 and therefore denies them.

306. Paragraph 307 relates to conduct alleged against other defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 307 and therefore denies them.

307. Paragraph 308 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 308 and therefore denies them.

308. Paragraph 309 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 309 and therefore denies them.

309. Paragraph 310 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 310 and therefore denies them.

310. Paragraph 311 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 311 and therefore denies them.

311. Paragraph 312 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 312 and therefore denies them.

312. Paragraph 313 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 313 and therefore denies them.

Under the Heading “Humana and the Defendant Brokers Knew It Was Illegal to Discriminate Against Medicare Beneficiaries with Disabilities”

313. Paragraph 314 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 314 and therefore denies them.

314. Paragraph 315 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 315 and therefore denies them.

315. Paragraph 316 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health

lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 316 and therefore denies them.

Under the Heading “Humana Pressured the Defendant Brokers and Others to Limit Enrollment of Beneficiaries with Disabilities”

316. Paragraph 317 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 317 and therefore denies them.

317. Paragraph 318 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 318 and therefore denies them.

318. Paragraph 319 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 319 and therefore denies them.

319. Paragraph 320 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 320 and therefore denies them.

320. Paragraph 321 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 321 and therefore denies them.

321. Paragraph 322 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 322 and therefore denies them.

322. Paragraph 323 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 323 and therefore denies them.

323. Paragraph 324 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 324 and therefore denies them.

324. Paragraph 325 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 325 and therefore denies them.

325. Paragraph 326 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 326 and therefore denies them.

326. Paragraph 327 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health

lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 327 and therefore denies them.

327. Paragraph 328 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 328 and therefore denies them.

328. Paragraph 329 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 329 and therefore denies them.

329. Paragraph 330 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 330 and therefore denies them.

330. Paragraph 331 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 331 and therefore denies them.

331. Paragraph 332 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 332 and therefore denies them.

332. Paragraph 333 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 333 and therefore denies them.

333. Paragraph 334 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 334 and therefore denies them.

334. Paragraph 335 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 335 and therefore denies them.

335. Paragraph 336 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 336 and therefore denies them.

336. Paragraph 337 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 337 and therefore denies them.

337. Paragraph 338 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health

lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 338 and therefore denies them.

Under the Heading “At Humana’s Behest, the Defendant Brokers and Others Limited Enrollment of Disabled Beneficiaries in Humana Plans”

338. Paragraph 339 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 339 and therefore denies them.

339. Paragraph 340 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 340 and therefore denies them.

340. Paragraph 341 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 341 and therefore denies them.

341. Paragraph 342 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 342 and therefore denies them.

342. Paragraph 343 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 343 and therefore denies them.

343. Paragraph 344 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 344 and therefore denies them.

344. Paragraph 345 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 345 and therefore denies them.

345. Paragraph 346 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 346 and therefore denies them.

346. Paragraph 347 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 347 and therefore denies them.

347. Paragraph 348 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 348 and therefore denies them.

348. Paragraph 349 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health

lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 349 and therefore denies them.

349. Paragraph 350 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 350 and therefore denies them.

350. Paragraph 351 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 351 and therefore denies them.

351. Paragraph 352 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 352 and therefore denies them.

352. Paragraph 353 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 353 and therefore denies them.

353. Paragraph 354 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 354 and therefore denies them.

354. Paragraph 355 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 355 and therefore denies them.

355. Paragraph 356 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 356 and therefore denies them.

356. Paragraph 357 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 357 and therefore denies them.

Under the Heading “Humana and the Defendant Brokers Were Successful in Their Scheme to Limit Enrollment of Beneficiaries with Disabilities”

357. Paragraph 358 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 358 and therefore denies them.

358. Paragraph 359 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 359 and therefore denies them.

359. Paragraph 360 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health

lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 360 and therefore denies them.

360. Paragraph 361 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 361 and therefore denies them.

361. Paragraph 362 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 362 and therefore denies them.

362. Paragraph 363 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 363 and therefore denies them.

363. Paragraph 364 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 364 and therefore denies them.

364. Paragraph 365 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 365 and therefore denies them.

365. Paragraph 366 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 366 and therefore denies them.

366. Paragraph 367 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 367 and therefore denies them.

367. Paragraph 368 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 368 and therefore denies them.

368. Paragraph 369 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 369 and therefore denies them.

369. Paragraph 370 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 370 and therefore denies them.

370. Paragraph 371 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health

lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 371 and therefore denies them.

371. Paragraph 372 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 372 and therefore denies them.

372. Paragraph 373 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 373 and therefore denies them.

373. Paragraph 374 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 374 and therefore denies them.

374. Paragraph 375 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 375 and therefore denies them.

375. Paragraph 376 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 376 and therefore denies them.

376. Paragraph 377 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 377 and therefore denies them.

Under the Heading “Aetna”

Under the Heading “Aetna Paid Kickbacks to the Defendant Brokers to Steer Medicare Beneficiaries to Aetna Plans and Limit Enrollments in Competitors’ Plans”

377. Paragraph 378 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 378 and therefore denies them.

378. Paragraph 379 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 379 and therefore denies them.

379. Paragraph 380 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 380 and therefore denies them.

380. Paragraph 381 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 381 and therefore denies them.

381. Paragraph 382 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 382 and therefore denies them.

382. Paragraph 383 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 383 and therefore denies them.

383. Paragraph 384 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 384 and therefore denies them.

384. Paragraph 385 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 385 and therefore denies them.

385. Paragraph 386 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 386 and therefore denies them.

Under the Heading “Aetna’s Kickbacks to eHealth”

386. Paragraph 387 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health

lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 387 and therefore denies them.

387. Paragraph 388 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 388 and therefore denies them.

388. Paragraph 389 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 389 and therefore denies them.

389. Paragraph 390 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 390 and therefore denies them.

390. Paragraph 391 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 391 and therefore denies them.

391. Paragraph 392 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 392 and therefore denies them.

392. Paragraph 393 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 393 and therefore denies them.

393. Paragraph 394 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 394 and therefore denies them.

394. Paragraph 395 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 395 and therefore denies them.

395. Paragraph 396 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 396 and therefore denies them.

396. Paragraph 397 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 397 and therefore denies them.

397. Paragraph 398 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health

lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 398 and therefore denies them.

398. Paragraph 399 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 399 and therefore denies them.

399. Paragraph 400 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 400 and therefore denies them.

400. Paragraph 401 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 401 and therefore denies them.

401. Paragraph 402 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 402 and therefore denies them.

402. Paragraph 403 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 403 and therefore denies them.

403. Paragraph 404 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 404 and therefore denies them.

404. Paragraph 405 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 405 and therefore denies them.

405. Paragraph 406 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 406 and therefore denies them.

406. Paragraph 407 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 407 and therefore denies them.

407. Paragraph 408 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 408 and therefore denies them.

408. Paragraph 409 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health

lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 409 and therefore denies them.

409. Paragraph 410 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 410 and therefore denies them.

410. Paragraph 411 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 411 and therefore denies them.

411. Paragraph 412 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 412 and therefore denies them.

412. Paragraph 413 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 413 and therefore denies them.

413. Paragraph 414 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 414 and therefore denies them.

414. Paragraph 415 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 415 and therefore denies them.

415. Paragraph 416 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 416 and therefore denies them.

416. Paragraph 417 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 417 and therefore denies them.

417. Paragraph 418 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 418 and therefore denies them.

418. Paragraph 419 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 419 and therefore denies them.

419. Paragraph 420 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health

lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 420 and therefore denies them.

Under the Heading “Aetna’s Kickbacks to SelectQuote”

420. Paragraph 421 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 421 and therefore denies them.

421. Paragraph 422 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 422 and therefore denies them.

422. Paragraph 423 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 423 and therefore denies them.

423. Paragraph 424 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 424 and therefore denies them.

424. Paragraph 425 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 425 and therefore denies them.

425. Paragraph 426 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 426 and therefore denies them.

426. Paragraph 427 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 427 and therefore denies them.

427. Paragraph 428 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 428 and therefore denies them.

428. Paragraph 429 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 429 and therefore denies them.

429. Paragraph 430 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 430 and therefore denies them.

430. Paragraph 431 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health

lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 431 and therefore denies them.

431. Paragraph 432 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 432 and therefore denies them.

432. Paragraph 433 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 433 and therefore denies them.

433. Paragraph 434 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 434 and therefore denies them.

434. Paragraph 435 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 435 and therefore denies them.

435. Paragraph 436 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 436 and therefore denies them.

436. Paragraph 437 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 437 and therefore denies them.

437. Paragraph 438 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 438 and therefore denies them.

438. Paragraph 439 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 439 and therefore denies them.

439. Paragraph 440 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 440 and therefore denies them.

440. Paragraph 441 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 441 and therefore denies them.

441. Paragraph 442 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health

lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 442 and therefore denies them.

442. Paragraph 443 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 443 and therefore denies them.

443. Paragraph 444 relates to conduct alleged against other Defendants and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 444 and therefore denies them.

444. Paragraph 445 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 445 and therefore denies them.

445. Paragraph 446 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 446 and therefore denies them.

446. Paragraph 447 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 447 and therefore denies them.

447. Paragraph 448 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 448 and therefore denies them.

448. Paragraph 449 relates to conduct alleged against other defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 449 and therefore denies them.

449. Paragraph 450 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 450 and therefore denies them.

450. Paragraph 451 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 451 and therefore denies them.

451. Paragraph 452 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 452 and therefore denies them.

452. Paragraph 453 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health

lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 453 and therefore denies them.

453. Paragraph 454 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 454 and therefore denies them.

454. Paragraph 455 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 455 and therefore denies them.

455. Paragraph 456 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 456 and therefore denies them.

456. Paragraph 457 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 457 and therefore denies them.

Under the Heading “Aetna’s Kickbacks to GoHealth”

457. Paragraph 458 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 458 and therefore denies them.

458. Paragraph 459 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 459 and therefore denies them.

459. Paragraph 460 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 460 and therefore denies them.

460. Paragraph 461 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 461 and therefore denies them.

461. Paragraph 462 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 462 and therefore denies them.

462. Paragraph 463 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 463 and therefore denies them.

463. Paragraph 464 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health

lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 464 and therefore denies them.

464. Paragraph 465 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 465 and therefore denies them.

465. Paragraph 466 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 466 and therefore denies them.

466. Paragraph 467 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 467 and therefore denies them.

Under the Heading “Aetna’s ‘Bonuses,’ ‘Rewards,’ and ‘Kickers’”

467. Paragraph 468 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 468 and therefore denies them.

468. Paragraph 469 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 469 and therefore denies them.

469. Paragraph 470 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 470 and therefore denies them.

470. Paragraph 471 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 471 and therefore denies them.

471. Paragraph 472 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 472 and therefore denies them.

472. Paragraph 473 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 473 and therefore denies them.

473. Paragraph 474 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 474 and therefore denies them.

474. Paragraph 475 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health

lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 475 and therefore denies them.

475. Paragraph 476 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 476 and therefore denies them.

476. Paragraph 477 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 477 and therefore denies them.

477. Paragraph 478 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 478 and therefore denies them.

478. Paragraph 479 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 479 and therefore denies them.

479. Paragraph 480 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 480 and therefore denies them.

480. Paragraph 481 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 481 and therefore denies them.

481. Paragraph 482 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 482 and therefore denies them.

482. Paragraph 483 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 483 and therefore denies them.

Under the Heading “Aetna Conspired with the Defendant Brokers and Others to Discriminate Against Medicare Beneficiaries with Disabilities”

483. Paragraph 484 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 484 and therefore denies them.

484. Paragraph 485 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 485 and therefore denies them.

485. Paragraph 486 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health

lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 486 and therefore denies them.

486. Paragraph 487 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 487 and therefore denies them.

487. Paragraph 488 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 488 and therefore denies them.

488. Paragraph 489 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 489 and therefore denies them.

489. Paragraph 490 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 490 and therefore denies them.

Under the Heading “Aetna and the Defendant Brokers Knew It Was Illegal to Discriminate Against Medicare Beneficiaries with Disabilities”

490. Paragraph 491 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 491 and therefore denies them.

491. Paragraph 492 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 492 and therefore denies them.

492. Paragraph 493 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 493 and therefore denies them.

493. Paragraph 494 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 494 and therefore denies them.

494. Paragraph 495 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 495 and therefore denies them.

Under the Heading “Aetna Pressured the Defendant Brokers and Others to Limit Enrollment of Beneficiaries with Disabilities”

495. Paragraph 496 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 496 and therefore denies them.

496. Paragraph 497 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health

lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 497 and therefore denies them.

497. Paragraph 498 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 498 and therefore denies them.

498. Paragraph 499 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 499 and therefore denies them.

499. Paragraph 500 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 500 and therefore denies them.

500. Paragraph 501 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 501 and therefore denies them.

501. Paragraph 502 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 502 and therefore denies them.

502. Paragraph 503 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 503 and therefore denies them.

503. Paragraph 504 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 504 and therefore denies them.

Under the Heading “At Aetna’s Behest, the Defendant Brokers and Others Limited Enrollment of Disabled Beneficiaries in Aetna Plans”

504. Paragraph 505 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 505 and therefore denies them.

505. Paragraph 506 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 506 and therefore denies them.

506. Paragraph 507 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 507 and therefore denies them.

507. Paragraph 508 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health

lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 508 and therefore denies them.

508. Paragraph 509 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 509 and therefore denies them.

509. Paragraph 510 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 510 and therefore denies them.

510. Paragraph 511 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 511 and therefore denies them.

511. Paragraph 512 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 512 and therefore denies them.

512. Paragraph 513 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 513 and therefore denies them.

513. Paragraph 514 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 514 and therefore denies them.

514. Paragraph 515 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 515 and therefore denies them.

515. Paragraph 516 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 516 and therefore denies them.

516. Paragraph 517 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 517 and therefore denies them.

517. Paragraph 518 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 518 and therefore denies them.

518. Paragraph 519 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health

lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 519 and therefore denies them.

519. Paragraph 520 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 520 and therefore denies them.

520. Paragraph 521 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 521 and therefore denies them.

521. Paragraph 522 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 522 and therefore denies them.

522. Paragraph 523 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 523 and therefore denies them.

523. Paragraph 524 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 524 and therefore denies them.

524. Paragraph 525 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 525 and therefore denies them.

525. Paragraph 526 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 526 and therefore denies them.

526. Paragraph 527 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 527 and therefore denies them.

527. Paragraph 528 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 528 and therefore denies them.

528. Paragraph 529 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 529 and therefore denies them.

529. Paragraph 530 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health

lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 530 and therefore denies them.

530. Paragraph 531 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 531 and therefore denies them.

531. Paragraph 532 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 532 and therefore denies them.

532. Paragraph 533 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 533 and therefore denies them.

533. Paragraph 534 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 534 and therefore denies them.

534. Paragraph 535 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 535 and therefore denies them.

535. Paragraph 536 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 536 and therefore denies them.

536. Paragraph 537 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 537 and therefore denies them.

537. Paragraph 538 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 538 and therefore denies them.

538. Paragraph 539 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 539 and therefore denies them.

539. Paragraph 540 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 540 and therefore denies them.

540. Paragraph 541 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health

lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 541 and therefore denies them.

541. Paragraph 542 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 542 and therefore denies them.

542. Paragraph 543 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 543 and therefore denies them.

543. Paragraph 544 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 544 and therefore denies them.

544. Paragraph 545 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 545 and therefore denies them.

545. Paragraph 546 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 546 and therefore denies them.

546. Paragraph 547 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 547 and therefore denies them.

547. Paragraph 548 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 548 and therefore denies them.

548. Paragraph 549 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 549 and therefore denies them.

549. Paragraph 550 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 550 and therefore denies them.

550. Paragraph 551 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 551 and therefore denies them.

551. Paragraph 552 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health

lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 552 and therefore denies them.

552. Paragraph 553 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 553 and therefore denies them.

553. Paragraph 554 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 554 and therefore denies them.

554. Paragraph 555 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 555 and therefore denies them.

555. Paragraph 556 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 556 and therefore denies them.

556. Paragraph 557 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 557 and therefore denies them.

557. Paragraph 558 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 558 and therefore denies them.

558. Paragraph 559 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 559 and therefore denies them.

559. Paragraph 560 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 560 and therefore denies them.

560. Paragraph 561 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 561 and therefore denies them.

561. Paragraph 562 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 562 and therefore denies them.

562. Paragraph 563 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health

lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 563 and therefore denies them.

563. Paragraph 564 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 564 and therefore denies them.

564. Paragraph 565 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 565 and therefore denies them.

565. Paragraph 566 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 566 and therefore denies them.

566. Paragraph 567 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 567 and therefore denies them.

567. Paragraph 568 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 568 and therefore denies them.

568. Paragraph 569 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 569 and therefore denies them.

569. Paragraph 570 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 570 and therefore denies them.

570. Paragraph 571 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 571 and therefore denies them.

571. Paragraph 572 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 572 and therefore denies them.

Under the Heading “Aetna Was Successful in Its Scheme to Limit Enrollment of Beneficiaries with Disabilities”

572. Paragraph 573 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 573 and therefore denies them.

573. Paragraph 574 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health

lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 574 and therefore denies them.

574. Paragraph 575 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 575 and therefore denies them.

575. Paragraph 576 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 576 and therefore denies them.

576. Paragraph 577 relates to conduct alleged against other Defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 577 and therefore denies them.

Under the Heading “Anthem”

Under the Heading “Anthem Paid Kickbacks to GoHealth and eHealth to Steer Medicare Beneficiaries to Aetna Plans and Limit Enrollments in Competitors’ Plans”

577. Denied.

578. Denied.

579. Denied.

580. Denied.

581. The allegations in Paragraph 582 purport to quote or characterize the contents of documents, the contents of which speak for themselves. Elevance Health denies the remaining allegations in Paragraph 582.

582. Denied.

Under the Heading “Anthem’s Kickbacks to GoHealth”

583. Denied.

584. The allegations in Paragraph 585 purport to quote or characterize the contents of documents, the contents of which speak for themselves. Elevance Health denies the remaining allegations in Paragraph 585.

585. Denied.

586. Elevance Health admits that it understood that GoHealth utilized marketing materials for its business operations. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 587, and therefore denies them.

587. Elevance Health admits that it understood that GoHealth utilized “downline agencies” in support of its business operations. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 588, and therefore denies them.

588. Elevance Health admits that it understood that some of GoHealth’s brokers were trained to market and sell Elevance Health MA plans. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 589, and therefore denies them.

589. The allegations in Paragraph 590 purport to quote or characterize the contents of a document, the contents of which speaks for itself. Elevance Health denies the remaining allegations in Paragraph 590.

590. Denied.

591. Elevance Health admits that on or about June 28, 2017, representatives of Elevance Health met with representatives of GoHealth. The allegations in Paragraph 592 otherwise purport

to quote or characterize the contents of documents and statements of GoHealth, the contents of which speak for themselves. Elevance Health denies the remaining allegations in Paragraph 592.

592. The allegations in Paragraph 593 purport to quote or characterize the contents of a document, the contents of which speaks for itself. Elevance Health denies the remaining allegations in Paragraph 593.

593. The allegations in Paragraph 594 purport to quote or characterize the contents of documents, the contents of which speak for themselves. Elevance Health denies the remaining allegations in Paragraph 594.

594. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 595 insofar as they relate to GoHealth and therefore denies them. Elevance Health denies the remaining allegations in Paragraph 595.

595. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 596, and therefore denies them.

596. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 597, and therefore denies them.

597. The allegations in Paragraph 598 purport to quote or characterize the contents of documents, the contents of which speak for themselves. Elevance Health admits that it monitored its business relationship with GoHealth. Except as so stated, Elevance Health denies the remaining allegations in Paragraph 598.

598. The allegations in Paragraph 599 purport to quote or characterize the contents of a document, the contents of which speaks for itself. Elevance Health denies the remaining allegations in Paragraph 599.

599. The allegations in Paragraph 600 purport to quote or characterize the contents of documents, the contents of which speak for themselves. Elevance Health denies the remaining allegations in Paragraph 600.

600. Denied.

601. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 602 insofar as they relate to GoHealth, and therefore denies them. Elevance Health denies the remaining allegations in Paragraph 602.

602. Denied.

603. Elevance Health admits that in or around February 2018 it had business discussions with GoHealth. Elevance Health denies the remaining allegations in Paragraph 604 insofar as they relate to Elevance Health. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 604 insofar as they relate to GoHealth, and therefore denies them.

604. The allegations in Paragraph 605 purport to quote or characterize the contents of documents, the contents of which speak for themselves. Elevance Health denies the remaining allegations in Paragraph 605.

605. The allegations in Paragraph 606 purport to quote or characterize the contents of documents, the contents of which speak for themselves. Elevance Health denies the remaining allegations in Paragraph 606.

606. Denied.

607. The allegations in Paragraph 608 purport to quote or characterize the contents of documents, the contents of which speak for themselves. Elevance Health denies the remaining allegations in Paragraph 608.

608. The allegations in Paragraph 609 purport to quote or characterize the contents of documents, the contents of which speak for themselves. Elevance Health denies the remaining allegations in Paragraph 609.

609. The allegations in Paragraph 610 purport to quote or characterize the contents of a document, the contents of which speaks for itself. Elevance Health denies the remaining allegations in Paragraph 610.

610. The allegations in Paragraph 611 purport to quote or characterize the contents of documents, the contents of which speak for themselves. Elevance Health denies the remaining allegations in Paragraph 611.

611. Denied.

612. Denied.

613. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 614, and therefore denies them.

614. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 615, and therefore denies them.

615. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 616, and therefore denies them.

616. Denied.

617. The allegations in Paragraph 618 purport to quote or characterize the contents of documents, the contents of which speak for themselves. Elevance Health denies the remaining allegations in Paragraph 618.

618. The allegations in Paragraph 619 purport to quote or characterize the contents of documents, the contents of which speak for themselves. Elevance Health denies the remaining allegations in Paragraph 619.

619. The allegations in Paragraph 620 purport to quote or characterize the contents of documents, the contents of which speak for themselves. Elevance Health denies the remaining allegations in Paragraph 620.

620. The allegations in Paragraph 621 purport to quote or characterize the contents of documents, the contents of which speak for themselves. Elevance Health denies the remaining allegations in Paragraph 621.

621. The allegations in Paragraph 622 purport to quote or characterize the contents of documents, the contents of which speak for themselves. Elevance Health denies the remaining allegations in Paragraph 622.

622. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 623 insofar as they relate to GoHealth, and therefore denies them. Elevance Health denies the remaining allegations in Paragraph 623.

623. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 624 insofar as they relate to GoHealth, and therefore denies them. Elevance Health denies the remaining allegations in Paragraph 624.

624. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 625 insofar as they relate to GoHealth, and therefore denies them. Elevance Health denies the remaining allegations in Paragraph 625.

625. The allegations in Paragraph 626 purport to quote or characterize the contents of documents, the contents of which speak for themselves. Elevance Health denies the remaining allegations in Paragraph 626.

626. The allegations in Paragraph 627 purport to quote or characterize the contents of documents, the contents of which speak for themselves. Elevance Health denies the remaining allegations in Paragraph 627.

627. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 628 insofar as they relate to GoHealth, and therefore denies them. Elevance Health denies the remaining allegations in Paragraph 628.

628. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 629 insofar as they relate to GoHealth, and therefore denies them. Elevance Health denies the remaining allegations in Paragraph 629.

629. Denied.

630. The allegations in Paragraph 631 purport to quote or characterize the contents of a document, the contents of which speaks for itself. Elevance Health denies the remaining allegations in Paragraph 631.

631. The allegations in Paragraph 632 purport to quote or characterize the contents of a document, the contents of which speaks for itself. Elevance Health denies the remaining allegations in Paragraph 632.

632. The allegations in Paragraph 633 purport to quote or characterize the contents of documents, the contents of which speak for themselves. Elevance Health denies the remaining allegations in Paragraph 633.

633. Denied.

634. The allegations in Paragraph 635 purport to quote or characterize the contents of documents, the contents of which speak for themselves. Elevance Health denies the remaining allegations in Paragraph 635.

635. The allegations in Paragraph 636 purport to quote or characterize the contents of documents, the contents of which speak for themselves. Elevance Health denies the remaining allegations in Paragraph 636.

636. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 637 insofar as they relate to GoHealth, and therefore denies them. Elevance Health denies the remaining allegations in Paragraph 637.

637. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 638 insofar as they relate to GoHealth, and therefore denies them. Elevance Health denies the remaining allegations in Paragraph 638.

638. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 639 insofar as they relate to GoHealth, and therefore denies them. Elevance Health denies the remaining allegations in Paragraph 639.

639. The allegations in Paragraph 640 purport to quote or characterize the contents of a document, the contents of which speaks for itself. Elevance Health denies the remaining allegations in Paragraph 640.

640. The allegations in Paragraph 641 purport to quote or characterize the contents of a document, the contents of which speaks for itself. Elevance Health denies the remaining allegations in Paragraph 641.

641. The allegations in Paragraph 642 purport to quote or characterize the contents of a document, the contents of which speaks for itself. Elevance Health denies the remaining allegations in Paragraph 642.

642. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 643 insofar as they relate to GoHealth, and therefore denies them. Elevance Health denies the remaining allegations in Paragraph 643.

643. Elevance Health admits that it entered into lawful commercial agreements with GoHealth relating to Medicare Advantage marketing and brokerage services, and that it paid GoHealth fair market value for these services. The allegations in Paragraph 644 purport to quote or characterize the contents of a document, the contents of which speaks for itself. Elevance Health denies the remaining allegations in Paragraph 644.

644. The allegations in Paragraph 645 purport to quote or characterize the contents of documents, the contents of which speak for themselves. Elevance Health denies the remaining allegations in Paragraph 645.

645. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 646 insofar as they relate to GoHealth, and therefore denies them. Elevance Health denies the remaining allegations in Paragraph 646.

646. Denied.

647. The allegations in Paragraph 648 purport to quote or characterize the contents of a document, the contents of which speaks for itself. Elevance Health denies the remaining allegations in Paragraph 648.

648. Denied.

649. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 650 insofar as they relate to GoHealth, and therefore denies them. Elevance Health denies the remaining allegations in Paragraph 650.

650. The allegations in Paragraph 651 purport to quote or characterize the contents of documents, the contents of which speak for themselves. Elevance Health denies the remaining allegations in Paragraph 651.

651. The allegations in Paragraph 652 purport to quote or characterize the contents of documents, the contents of which speak for themselves. Elevance Health denies the remaining allegations in Paragraph 652.

652. Elevance Health admits that it entered into lawful commercial agreements with GoHealth relating to Medicare Advantage marketing and brokerage services, and that it paid GoHealth fair market value for these services. The allegations in Paragraph 653 purport to quote or characterize the contents of documents, the contents of which speak for themselves. Elevance Health denies the remaining allegations in Paragraph 653.

653. The allegations in Paragraph 654 purport to quote or characterize the contents of documents, the contents of which speak for themselves. Elevance Health denies the remaining allegations in Paragraph 654.

654. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 655 insofar as they relate to GoHealth, and therefore denies them. Elevance Health denies the remaining allegations in Paragraph 655.

655. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 656 insofar as they relate to GoHealth, and therefore denies them. Elevance Health denies the remaining allegations in Paragraph 656.

656. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 657 insofar as they relate to GoHealth, and therefore denies them. Elevance Health denies the remaining allegations in Paragraph 657.

657. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 658 insofar as they relate to GoHealth, and therefore denies them. Elevance Health denies the remaining allegations in Paragraph 658.

658. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 659 insofar as they relate to GoHealth, and therefore denies them. Elevance Health denies the remaining allegations in Paragraph 659.

659. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 660 insofar as they relate to GoHealth, and therefore denies them. Elevance Health denies the remaining allegations in Paragraph 660.

660. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 661 insofar as they relate to GoHealth, and therefore denies them. Elevance Health denies the remaining allegations in Paragraph 661.

661. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 662 insofar as they relate to GoHealth, and therefore denies them. Elevance Health denies the remaining allegations in Paragraph 662.

662. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 663 insofar as they relate to GoHealth, and therefore denies them. Elevance Health denies the remaining allegations in Paragraph 663.

663. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 664 insofar as they relate to GoHealth, and therefore denies them. Elevance Health denies the remaining allegations in Paragraph 664.

664. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 665 insofar as they relate to GoHealth, and therefore denies them. Elevance Health denies the remaining allegations in Paragraph 665.

665. The allegations in Paragraph 666 purport to quote or characterize the contents of documents, the contents of which speak for themselves. Elevance Health denies the remaining allegations in Paragraph 666.

666. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 667 insofar as they relate to GoHealth, and therefore denies them. Elevance Health denies the remaining allegations in Paragraph 667.

667. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 668 insofar as they relate to GoHealth, and therefore denies them. Elevance Health denies the remaining allegations in Paragraph 668.

668. The allegations in Paragraph 669 purport to quote or characterize the contents of documents, the contents of which speak for themselves. Elevance Health denies the remaining allegations in Paragraph 669.

669. The allegations in Paragraph 670 purport to quote or characterize the contents of a document, the contents of which speaks for itself. Elevance Health denies the remaining allegations in Paragraph 670.

670. Denied.

671. The allegations in Paragraph 672 purport to quote or characterize the contents of documents, the contents of which speak for themselves. Elevance Health denies the remaining allegations in Paragraph 672.

672. The allegations in Paragraph 673 purport to quote or characterize the contents of documents, the contents of which speak for themselves. Elevance Health denies the remaining allegations in Paragraph 673.

673. The allegations in Paragraph 674 purport to quote or characterize the contents of a document, the contents of which speaks for itself. Elevance Health denies the remaining allegations in Paragraph 674.

674. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 675 insofar as they relate to GoHealth, and therefore denies them. Elevance Health denies the remaining allegations in Paragraph 675.

675. The allegations in Paragraph 676 purport to quote or characterize the contents of documents, the contents of which speak for themselves. Elevance Health denies the remaining allegations in Paragraph 676.

676. The allegations in Paragraph 677 purport to quote or characterize the contents of a document, the contents of which speaks for itself. Elevance Health denies the remaining allegations in Paragraph 677.

677. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 678 insofar as they relate to GoHealth, and therefore denies them. Elevance Health denies the remaining allegations in Paragraph 678.

678. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 679 insofar as they relate to GoHealth, and therefore denies them. Elevance Health denies the remaining allegations in Paragraph 679.

679. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 680 insofar as they relate to GoHealth, and therefore denies them. Elevance Health denies the remaining allegations in Paragraph 680.

680. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 681 insofar as they relate to GoHealth, and therefore denies them. Elevance Health denies the remaining allegations in Paragraph 681.

681. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 682 insofar as they relate to GoHealth, and therefore denies them. Elevance Health denies the remaining allegations in Paragraph 682.

682. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 683 insofar as they relate to GoHealth, and therefore denies them. Elevance Health denies the remaining allegations in Paragraph 683.

683. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 684 insofar as they relate to GoHealth, and therefore denies them. Elevance Health denies the remaining allegations in Paragraph 684.

684. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 685 insofar as they relate to GoHealth, and therefore denies them. Elevance Health denies the remaining allegations in Paragraph 685.

685. Denied.

686. The allegations in Paragraph 687 purport to quote or characterize the contents of a document, the contents of which speaks for itself. Elevance Health denies the remaining allegations in Paragraph 687.

687. The allegations in Paragraph 688 purport to quote or characterize the contents of a document, the contents of which speaks for itself. Elevance Health denies the remaining allegations in Paragraph 688.

688. Denied.

689. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 690 insofar as they relate to GoHealth, and therefore denies them. Elevance Health denies the remaining allegations in Paragraph 690.

690. The allegations in Paragraph 691 purport to quote or characterize the contents of documents, the contents of which speak for themselves. Elevance Health denies the remaining allegations in Paragraph 691.

691. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 692 insofar as they relate to GoHealth, and therefore denies them. Elevance Health denies the remaining allegations in Paragraph 692.

692. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 693 insofar as they relate to GoHealth, and therefore denies them. Elevance Health denies the remaining allegations in Paragraph 693.

693. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 694 insofar as they relate to GoHealth, and therefore denies them. Elevance Health denies the remaining allegations in Paragraph 694.

694. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 695 insofar as they relate to GoHealth, and therefore denies them. Elevance Health denies the remaining allegations in Paragraph 695.

695. The allegations in Paragraph 696 purport to quote or characterize the contents of a document, the contents of which speaks for itself. Elevance Health denies the remaining allegations in Paragraph 696.

696. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 697 insofar as they relate to GoHealth, and therefore denies them. Elevance Health denies the remaining allegations in Paragraph 697.

697. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 698 insofar as they relate to GoHealth, and therefore denies them. Elevance Health denies the remaining allegations in Paragraph 698.

698. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 699 insofar as they relate to GoHealth, and therefore denies them. Elevance Health denies the remaining allegations in Paragraph 699.

699. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 700 insofar as they relate to GoHealth, and therefore denies them. Elevance Health denies the remaining allegations in Paragraph 700.

700. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 701 insofar as they relate to GoHealth, and therefore denies them. Elevance Health denies the remaining allegations in Paragraph 701.

701. The allegations in Paragraph 702 purport to quote or characterize the contents of documents, the contents of which speak for themselves. Elevance Health denies the remaining allegations in Paragraph 702.

702. Denied.

703. The allegations in Paragraph 704 purport to quote or characterize the contents of documents, the contents of which speak for themselves. Elevance Health denies the remaining allegations in Paragraph 704.

704. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 705 insofar as they relate to GoHealth, and therefore denies them. The allegations in Paragraph 705 otherwise purport to quote or characterize the contents of documents, the contents of which speak for themselves. Elevance Health denies the remaining allegations in Paragraph 705.

705. The allegations in Paragraph 706 purport to quote or characterize the contents of a document, the contents of which speaks for itself. Elevance Health denies the remaining allegations in Paragraph 706.

706. The allegations in Paragraph 707 purport to quote or characterize the contents of a document, the contents of which speaks for itself. Elevance Health denies the remaining allegations in Paragraph 707.

707. The allegations in Paragraph 708 purport to quote or characterize the contents of documents, the contents of which speak for themselves. Elevance Health denies the remaining allegations in Paragraph 708.

708. Denied.

709. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 710 insofar as they relate to GoHealth, and therefore denies them. Elevance Health denies the remaining allegations in Paragraph 710.

710. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 711 insofar as they relate to GoHealth, and therefore denies them. Elevance Health denies the remaining allegations in Paragraph 711.

711. Denied.

Under the Heading “Anthem’s Kickbacks to eHealth”

712. Denied.

713. The allegations in Paragraph 714 purport to quote or characterize the contents of documents, the contents of which speak for themselves. Elevance Health denies the remaining allegations in Paragraph 714.

714. The allegations in Paragraph 715 purport to quote or characterize the contents of documents, the contents of which speak for themselves. Elevance Health denies the remaining allegations in Paragraph 715.

715. The allegations in Paragraph 716 purport to quote or characterize the contents of documents, the contents of which speak for themselves. Elevance Health denies the remaining allegations in Paragraph 716.

716. Denied.

717. The allegations in Paragraph 718 purport to quote or characterize the contents of a document, the contents of which speaks for itself. Elevance Health denies the remaining allegations in Paragraph 718.

718. The allegations in Paragraph 719 purport to quote or characterize the contents of a document, the contents of which speaks for itself. Elevance Health denies the remaining allegations in Paragraph 719.

719. The allegations in Paragraph 720 purport to quote or characterize the contents of a document, the contents of which speaks for itself. Elevance Health denies the remaining allegations in Paragraph 720.

720. The allegations in Paragraph 721 purport to quote or characterize the contents of documents, the contents of which speak for themselves. Elevance Health denies the remaining allegations in Paragraph 721.

721. The allegations in Paragraph 722 purport to quote or characterize the contents of a document, the contents of which speaks for itself. Elevance Health denies the remaining allegations in Paragraph 722.

722. The allegations in Paragraph 722 purport to quote or characterize the contents of a document, the contents of which speaks for itself. Elevance Health denies the remaining allegations in Paragraph 723.

723. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 724 insofar as they relate to eHealth, and therefore denies them. Elevance Health denies the remaining allegations in Paragraph 724.

724. The allegations in Paragraph 725 purport to quote or characterize the contents of documents, the contents of which speak for themselves. Elevance Health denies the remaining allegations in Paragraph 725.

725. The allegations in Paragraph 726 purport to quote or characterize the contents of documents, the contents of which speak for themselves. Elevance Health denies the remaining allegations in Paragraph 726.

726. Denied.

727. Elevance Health admits that it entered into lawful commercial agreements with eHealth relating to Medicare Advantage marketing and brokerage services, and that it paid eHealth fair market value for these services. Except as so stated, Elevance Health denies the remaining allegations in Paragraph 728.

728. The allegations in Paragraph 729 purport to quote or characterize the contents of documents, the contents of which speak for themselves. Elevance Health denies the remaining allegations in Paragraph 729.

729. The allegations in Paragraph 730 purport to quote or characterize the contents of documents, the contents of which speak for themselves. Elevance Health denies the remaining allegations in Paragraph 730.

730. The allegations in Paragraph 731 purport to quote or characterize the contents of documents and communications, the contents of which speak for themselves. Elevance Health denies the remaining allegations in Paragraph 731.

731. The allegations in Paragraph 732 purport to quote or characterize the contents of documents, the contents of which speak for themselves. Elevance Health denies the remaining allegations in Paragraph 732.

732. The allegations in Paragraph 733 purport to quote or characterize the contents of documents and communications, the contents of which speak for themselves, and otherwise alleges a state of mind . Elevance Health denies the remaining allegations in Paragraph 733.

733. The allegations in Paragraph 734 purport to quote or characterize the contents of a document, the contents of which speaks for itself. Elevance Health denies the remaining allegations in Paragraph 734.

734. Denied.

735. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 736 insofar as they relate to eHealth, and therefore denies them. Elevance Health denies the remaining allegations in Paragraph 736.

736. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 737 insofar as they relate to eHealth, and therefore denies them. Elevance Health denies the remaining allegations in Paragraph 737.

737. The allegations in Paragraph 738 purport to quote or characterize the contents of a document, the contents of which speaks for itself. Elevance Health denies the remaining allegations in Paragraph 738.

738. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 739 insofar as they relate to eHealth, and therefore denies them. Elevance Health denies the remaining allegations in Paragraph 739.

739. Denied.

740. Denied.

741. Denied.

Under the Heading “The Defendants’ Kickback Schemes Harmed Medicare Beneficiaries”

742. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 743 with respect to other Defendants and therefore denies them. Elevance Health denies the allegations in Paragraph 743 with respect to Elevance Health.

743. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 744 with respect to other Defendants and therefore denies them. Elevance Health denies the allegations in Paragraph 744 with respect to Elevance Health.

744. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 745, and therefore denies them.

745. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 746, and therefore denies them.

746. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 747, and therefore denies them.

747. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 748, and therefore denies them.

748. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 749, and therefore denies them.

749. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 750, and therefore denies them.

750. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 751, and therefore denies them.

751. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 752, and therefore denies them.

752. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 753, and therefore denies them.

753. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 754 insofar as they relate to GoHealth, and therefore denies them. Elevance Health denies the remaining allegations in Paragraph 754.

754. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 755, and therefore denies them.

755. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 756, and therefore denies them.

756. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 757, and therefore denies them.

757. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 758, and therefore denies them.

758. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 759, and therefore denies them.

759. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 760, and therefore denies them.

760. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 761, and therefore denies them.

761. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 762, and therefore denies them.

762. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 763, and therefore denies them.

763. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 764, and therefore denies them.

Under the Heading “The Defendants Made Material False Claims”

Under the Heading “The Defendants Made, or Caused to Be Made, Material False Claims Because They Violated the Anti-Kickback Statute”

764. Denied.

765. Denied.

Under the Heading “The Defendant Insurers’ Contracts with CMS Required Each Defendant Insurer to Agree to Comply with the AKS”

766. Elevance Health admits that, during the relevant period, it entered into certain agreements with CMS regarding the Medicare Advantage program. The allegations in Paragraph 767 otherwise purport to quote or characterize the contents of documents, the contents of which speak for themselves. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 767 insofar as they relate to other Defendants.

767. The allegations in Paragraph 768 purport to quote or characterize the contents of documents, the contents of which speak for themselves. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 768 insofar as they relate to other Defendants. Elevance Health denies the remaining allegations as they pertain to Elevance Health in Paragraph 768.

768. The allegations in Paragraph 769 are legal conclusions and characterizations by Plaintiff to which no response is required. To the extent a response is required, Elevance Health denies the allegations in Paragraph 769.

769. The allegations in Paragraph 770 purport to quote or characterize the contents of documents, the contents of which speak for themselves. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 770 insofar as they relate to other Defendants, and therefore denies them. Elevance Health denies the remaining allegations as they pertain to Elevance Health in Paragraph 770.

770. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 771, and therefore denies them.

771. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 772, and therefore denies them.

772. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 773, and therefore denies them.

773. The allegations in Paragraph 774 purport to quote or characterize the contents of documents, the contents of which speak for themselves. Elevance Health denies the remaining allegations in Paragraph 774.

Under the Heading “The Defendant Insurers Certified in Their Claims for Payment That the Information They Provided Was Truthful”

774. Elevance Health admits that it had to and did submit enrollment and payment data information to CMS monthly for payment purposes and did so from 2016 through 2019. Elevance Health admits that it had to and did submit enrollment information and payment data to CMS for payment purposes and did so on a quarterly basis starting in 2020. Elevance Health denies the remaining allegations in Paragraph 775 based on lack of sufficient information and belief as they pertain to other Defendants.

775. The allegations in Paragraph 776 purport to quote or characterize the contents of documents, the contents of which speak for themselves. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 776 insofar as they relate to other Defendants. Elevance Health denies the remaining allegations in Paragraph 776.

776. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 777, and therefore denies them.

777. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 778, and therefore denies them.

778. The allegations in Paragraph 779 purport to quote or characterize the contents of documents, the contents of which speak for themselves. Elevance Health denies the remaining allegations in Paragraph 779.

779. Denied.

780. Denied.

781. Denied.

Under the Heading “Aetna, Humana, and the Defendant Brokers Made, or Caused to Be Made, Material False Claims Because They Violated Anti-Discrimination Laws, Regulations, and Contractual Provisions”

Under the Heading “Aetna and Humana Agreed in Contracts with CMS to Comply with Anti-Discrimination Laws and Regulations”

782. Paragraph 783 relates to conduct alleged against other defendants, and no response is required from Elevance Health. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 783 directed to other Defendants and therefore denies them. To the extent further response is required, Elevance Health denies the allegations in Paragraph 783 to the extent they are inconsistent with CMS And Medicare Advantage statues and regulations, and specifically denies Plaintiff’s interpretation of regulations.

783. Paragraph 784 relates to conduct alleged against other defendants, and no response is required from Elevance Health. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 784 directed to other Defendants and therefore denies them. To the extent further response is required, Elevance Health denies the allegations in Paragraph 784 to the extent they are inconsistent with CMS And Medicare Advantage statues and regulations, and specifically denies Plaintiff’s interpretation of regulations.

784. Paragraph 785 relates to conduct alleged against other defendants, and no response is required from Elevance Health. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 785 directed to other Defendants and therefore denies them. To the extent further response is required, Elevance Health denies the allegations in Paragraph 785 to the extent they are inconsistent with CMS And Medicare Advantage statues and regulations, and specifically denies Plaintiff's interpretation of regulations.

785. Paragraph 786 relates to conduct alleged against other defendants, and no response is required from Elevance Health. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 786 directed to other Defendants and therefore denies them. To the extent further response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 786 and therefore denies them.

786. Paragraph 787 relates to conduct alleged against other defendants, and no response is required from Elevance Health. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 787 directed to other Defendants and therefore denies them. To the extent further response is required, Elevance Health denies the allegations in Paragraph 785 to the extent they are inconsistent with CMS And Medicare Advantage statues and regulations, and specifically denies Plaintiff's interpretation of regulations.

Under the Heading "Aetna and Humana Conspired with the Defendant Brokers to Discriminate Against Medicare Beneficiaries with Disabilities in Violation of Contractual Requirements"

787. Paragraph 788 relates to conduct alleged against other defendants, and no response is required from Elevance Health. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 788 directed to other Defendants and therefore denies them. To the extent further response is deemed required, Elevance Health lacks

knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 788 and therefore denies them.

788. Paragraph 789 relates to conduct alleged against other defendants, and no response is required from Elevance Health. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 789 directed to other Defendants and therefore denies them. To the extent further response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 789 and therefore denies them.

789. Paragraph 790 relates to conduct alleged against other defendants, and no response is required from Elevance Health. Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 790 directed to other Defendants and therefore denies them. To the extent further response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 790 and therefore denies them.

Under the Heading “Examples of False Claims to the Government”

Under the Heading “Humana and GoHealth”

790. Paragraph 791 relates to conduct alleged against other defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 791 and therefore denies them.

Under the Heading “Humana and SelectQuote”

791. Paragraph 792 relates to conduct alleged against other defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health

lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 792 and therefore denies them.

Under the Heading “Humana and eHealth”

792. Paragraph 793 relates to conduct alleged against other defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 793 and therefore denies them.

Under the Heading “Aetna and eHealth”

793. Paragraph 794 relates to conduct alleged against other defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 794 and therefore denies them.

Under the Heading “Aetna and SelectQuote”

794. Paragraph 795 relates to conduct alleged against other defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 795 and therefore denies them.

Under the Heading “Aetna and GoHealth”

795. Paragraph 796 relates to conduct alleged against other defendants, and no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 796 and therefore denies them.

Under the Heading “Anthem and GoHealth”

796. Denied.

Under the Heading “Anthem and eHealth”

797. Denied.

Under the Heading “Causes of Action”

COUNT I

**Violation of the False Claims Act:
Presentation, or Causing Presentation, of False or Fraudulent Claims for Payment
Resulting from a Violation of the Anti-Kickback Statute**

(31 U.S.C. § 3729(a)(1)(A))

All Defendants

798. Elevance Health realleges and incorporates by reference its answers to all of the preceding paragraphs as if fully set forth herein.

799. Denied.

800. Denied.

801. Denied.

802. Denied.

COUNT II

**Violation of the False Claims Act:
Presentation, or Causing Presentation, of False or Fraudulent Claims for Payment (31
U.S.C. § 3729(a)(1)(A))**

All Defendants

803. Elevance Health realleges and incorporates by reference its answers to all of the preceding paragraphs as if fully set forth herein.

804. Denied.

805. Denied.

806. Denied.

807. Denied.

808. Denied.

809. Denied.

810. Denied.

811. Denied.

812. Denied.

813. Denied.

814. Denied.

COUNT III

Violation of the False Claims Act: Presentation, or Causing Presentation, of False or Fraudulent Claims for Payment

(31 U.S.C. § 3729(a)(1)(A))

Humana, Aetna, CVS Health, and the Defendant Brokers

815. Elevance Health realleges and incorporates by reference its answers to all of the preceding paragraphs as if fully set forth herein.

816. The allegations in Paragraph 817 do not relate to a cause of action asserted against Elevance Health, and therefore no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 817 and therefore denies them.

817. The allegations in Paragraph 818 do not relate to a cause of action asserted against Elevance Health, and therefore no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 818 and therefore denies them.

818. The allegations in Paragraph 819 do not relate to a cause of action asserted against Elevance Health, and therefore no response is required from Elevance Health. To the extent a

response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 819 and therefore denies them.

819. The allegations in Paragraph 820 do not relate to a cause of action asserted against Elevance Health, and therefore no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 820 and therefore denies them.

820. The allegations in Paragraph 821 do not relate to a cause of action asserted against Elevance Health, and therefore no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 821 and therefore denies them.

821. The allegations in Paragraph 822 do not relate to a cause of action asserted against Elevance Health, and therefore no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 822 and therefore denies them.

822. The allegations in Paragraph 823 do not relate to a cause of action asserted against Elevance Health, and therefore no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 823 and therefore denies them.

823. The allegations in Paragraph 824 do not relate to a cause of action asserted against Elevance Health, and therefore no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 824 and therefore denies them.

824. The allegations in Paragraph 825 do not relate to a cause of action asserted against Elevance Health, and therefore no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 825 and therefore denies them.

825. The allegations in Paragraph 826 do not relate to a cause of action asserted against Elevance Health, and therefore no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 826 and therefore denies them.

826. The allegations in Paragraph 827 do not relate to a cause of action asserted against Elevance Health, and therefore no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 827 and therefore denies them.

COUNT IV

Violation of the False Claims Act:

False Records or Statements Material to False or Fraudulent Claims

(31 U.S.C. § 3729(a)(1)(B))

All Defendants

827. Elevance Health realleges and incorporates by reference its answers to all of the preceding paragraphs as if fully set forth herein.

828. Denied.

829. Denied.

830. Denied.

831. Denied.

832. Denied.

833. Denied.

834. Denied.

835. Denied.

836. Denied.

837. Denied.

838. Denied.

COUNT V

**Violation of the False Claims Act:
False Records or Statements Material to False or Fraudulent Claims**

(31 U.S.C. § 3729(a)(1)(B))

Humana, Aetna, CVS Health, and the Defendant Brokers

839. Elevance Health realleges and incorporates by reference its answers to all of the preceding paragraphs as if fully set forth herein.

840. The allegations in Paragraph 841 do not relate to a cause of action asserted against Elevance Health, and therefore no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 841 and therefore denies them.

841. The allegations in Paragraph 842 do not relate to a cause of action asserted against Elevance Health, and therefore no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 842 and therefore denies them.

842. The allegations in Paragraph 843 do not relate to a cause of action asserted against Elevance Health, and therefore no response is required from Elevance Health. To the extent a

response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 843 and therefore denies them.

843. The allegations in Paragraph 844 do not relate to a cause of action asserted against Elevance Health, and therefore no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 844 and therefore denies them.

844. The allegations in Paragraph 845 do not relate to a cause of action asserted against Elevance Health, and therefore no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 841 and therefore denies them.

845. The allegations in Paragraph 846 do not relate to a cause of action asserted against Elevance Health, and therefore no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 846 and therefore denies them.

846. The allegations in Paragraph 847 do not relate to a cause of action asserted against Elevance Health, and therefore no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 847 and therefore denies them.

847. The allegations in Paragraph 848 do not relate to a cause of action asserted against Elevance Health, and therefore no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 848 and therefore denies them.

848. The allegations in Paragraph 849 do not relate to a cause of action asserted against Elevance Health, and therefore no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 849 and therefore denies them.

849. The allegations in Paragraph 850 do not relate to a cause of action asserted against Elevance Health, and therefore no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 850 and therefore denies them.

850. The allegations in Paragraph 851 do not relate to a cause of action asserted against Elevance Health, and therefore no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 851 and therefore denies them.

851. The allegations in Paragraph 852 do not relate to a cause of action asserted against Elevance Health, and therefore no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 852 and therefore denies them.

COUNT VI

Violation of the False Claims Act: Conspiracy to Violate 31 U.S.C. §§ 3729(a)(1)(A) and 3729(a)(1)(B)

(31 U.S.C. § 3729(a)(1)(C))

All Defendants

852. Elevance Health realleges and incorporates by reference its answers to all of the preceding paragraphs as if fully set forth herein.

853. Denied.

854. Denied.

855. Denied.

856. Denied.

COUNT VII

**Violation of the False Claims Act:
Conspiracy to Violate 31 U.S.C. §§ 3729(a)(1)(A) and 3729(a)(1)(B)**

(31 U.S.C. § 3729(a)(1)(C))

Humana, Aetna, CVS Health, and the Defendant Brokers

857. Elevance Health realleges and incorporates by reference its answers to all of the preceding paragraphs as if fully set forth herein.

858. The allegations in Paragraph 859 do not relate to a cause of action asserted against Elevance Health, and therefore no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 859 and therefore denies them.

859. The allegations in Paragraph 860 do not relate to a cause of action asserted against Elevance Health, and therefore no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 860 and therefore denies them.

860. The allegations in Paragraph 861 do not relate to a cause of action asserted against Elevance Health, and therefore no response is required from Elevance Health. To the extent a response is deemed required, Elevance Health lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 861 and therefore denies them.

COUNT VIII

Unjust Enrichment

All Defendants

861. Elevance Health realleges and incorporates by reference its answers to all of the preceding paragraphs as if fully set forth herein.

862. Denied. Count VIII has been dismissed and therefore fails as a matter of law.

863. Denied. Count VIII has been dismissed and therefore fails as a matter of law.

864. Denied. Count VIII has been dismissed and therefore fails as a matter of law.

865. Denied. Count VIII has been dismissed and therefore fails as a matter of law.

The remaining allegations merely describe the nature of the relief sought by Plaintiff, to which no response is required. To the extent that these allegations may be construed as containing factual allegations against Elevance Health requiring a response, Elevance Health denies the allegations and denies that Plaintiff is entitled to any relief in this action.

AFFIRMATIVE DEFENSES

Elevance Health asserts the following affirmative and additional defenses. Each defense is asserted as to all claims to the extent applicable, unless otherwise indicated. By asserting these defenses, Elevance Health does not assume the burden of proof as to any fact, issue, or element of any claim for which such burden properly belongs to Plaintiff. Moreover, nothing stated herein is intended to be construed as an acknowledgement or admission that any allegation, issue, or subject matter is relevant or material to Plaintiff's claims. Elevance Health reserves the right to amend or supplement this Answer, including its affirmative defenses, as warranted by further investigation, discovery, or other developments in this action.

First Affirmative Defense

The claims asserted against Elevance Health are barred, in whole or in part, because Plaintiff has not sued Elevance Health in the proper venue.

Second Affirmative Defense

The claims asserted against Elevance Health are barred, in whole or in part, because Plaintiff has failed to plead Elevance Health presented or caused to be presented any objectively false or fraudulent statement, representation, certification, record, or claim to the United States.

Third Affirmative Defense

The claims asserted against Elevance Health are barred, in whole or in part, because Plaintiff has failed to plead Elevance Health made or used, or caused to be made or used, any objectively false or fraudulent statement, representation, certification, record, in support of any claim presented to the Government.

Fourth Affirmative Defense

The claims asserted against Elevance Health are barred, in whole or in part, because Plaintiff's theories are incorrect as a matter of law and do not establish falsity under the False Claims Act.

Fifth Affirmative Defense

The claims asserted against Elevance Health are barred, in whole or in part, because Plaintiff has failed to plead that any alleged noncompliance was material to any payment decision of the United States or any of its agencies, as required under the False Claims Act.

Sixth Affirmative Defense

The claims asserted against Elevance Health are barred, in whole or in part, because Elevance Health lacked the scienter required for liability under the False Claims Act, including

because it did not act with actual knowledge, deliberate ignorance, or reckless disregard of any alleged falsity.

Seventh Affirmative Defense

The claims asserted against Elevance Health are barred, in whole or in part, because any alleged conduct by Elevance Health was at all times undertaken in good faith and without fraudulent intent to ensure compliance with reasonable interpretations of applicable statutes, regulations, rules, contracts, and guidance, and therefore cannot support the requisite scienter for False Claims Act liability.

Eighth Affirmative Defense

The claims asserted against Elevance Health are barred, in whole or in part, because Plaintiff's theories improperly rely on non-binding regulatory, interpretive, or sub-regulatory guidance, guidance documents, commentary, manuals, informal agency communications, or other materials that do not create binding legal obligations and cannot establish falsity, scienter, or materiality under the False Claims Act.

Ninth Affirmative Defense

The claims asserted against Elevance Health are barred, in whole or in part, because the United States' knowledge of the facts underlying the allegedly false claims negates the scienter requirement of the False Claims Act.

Tenth Affirmative Defense

The claims asserted against Elevance Health are barred, in whole or in part, because the United States' knowledge of the facts underlying the allegedly false claims negates the falsity element of the False Claims Act.

Eleventh Affirmative Defense

The claims asserted against Elevance Health are barred, in whole or in part, because the United States' knowledge of the facts underlying the allegedly false claims negates the materiality element of the False Claims Act.

Twelfth Affirmative Defense

The claims asserted against Elevance Health are barred, in whole or in part, by the doctrines of waiver, estoppel, acquiescence, ratification, consent, release, and/or related equitable doctrines, including to the extent the United States or its agencies were aware of facts relating to the claims or conduct at issue yet continued to authorize, accept, process, or pay claims or otherwise permitted the alleged conduct to continue.

Thirteenth Affirmative Defense

The claims asserted against Elevance Health are barred, in whole or in part, because none of Elevance Health's alleged conduct was a cause in fact, but-for cause, a substantial factor, or a proximate cause of any injury, loss, or damages allegedly sustained by Plaintiff.

Fourteenth Affirmative Defense

The claims asserted against Elevance Health are barred, in whole or in part, because Plaintiff has failed to allege any actual damages sustained by the United States because of any act or omission of Elevance Health.

Fifteenth Affirmative Defense

The claims asserted against Elevance Health are barred, in whole or in part, because any alleged injury or damages are remote, speculative, contingent, uncertain, incapable of reasonable apportionment, and/or otherwise not recoverable as a matter of law.

Sixteenth Affirmative Defense

The claims asserted against Elevance Health are barred, in whole or in part, because any alleged injury was caused by the acts, omissions, decisions, representations, or independent business judgments of third parties over whom Elevance Health had no control, constituting intervening, superseding, and/or independent causes.

Seventeenth Affirmative Defense

The claims asserted against Elevance Health are barred, in whole or in part, because any allegedly unlawful act or omission was committed by persons acting outside the scope of any actual or apparent authority, outside the course and scope of employment, ultra vires, or contrary to Elevance Health's policies, training, instructions, and compliance requirements.

Eighteenth Affirmative Defense

The claims asserted against Elevance Health are barred, in whole or in part, because Plaintiff has failed to plead the existence of an Anti-Kickback Statute violation by Elevance Health.

Nineteenth Affirmative Defense

The claims asserted against Elevance Health are barred, in whole or in part, because the conduct alleged does not fall within the scope of the Anti-Kickback Statute, including because Medicare Advantage plans and/or enrollments in Medicare Advantage plans are not "items," "goods," "services," or a "facility" within the meaning of the Anti-Kickback Statute.

Twentieth Affirmative Defense

The claims asserted against Elevance Health are barred, in whole or in part, because the payments challenged by Plaintiff were authorized by statute and regulated by CMS, including as

lawful payments for administrative and/or marketing services, and therefore cannot constitute unlawful kickbacks or false claims as a matter of law.

Twenty-First Affirmative Defense

The claims asserted against Elevance Health are barred, in whole or in part, because the payments challenged by Plaintiff were for bona fide services, including administrative, marketing, outreach, and related services, and were not unlawful remuneration.

Twenty-Second Affirmative Defense

The claims asserted against Elevance Health are barred, in whole or in part, because any payments challenged by Plaintiff reflected fair market value for bona fide services actually rendered, were commercially reasonable, and therefore do not constitute unlawful remuneration under the Anti-Kickback Statute.

Twenty-Third Affirmative Defense

The claims asserted against Elevance Health are barred, in whole or in part, by the applicability of one or more statutory exceptions and/or regulatory safe harbors under the Anti-Kickback Statute, including but not limited to any safe harbor or exception for personal services and management contracts, referral services, and other applicable arrangements, to the extent such safe harbors or exceptions are shown by the evidence. See, e.g., 42 C.F.R. § 1001.952.

Twenty-Fourth Affirmative Defense

The claims asserted against Elevance Health are barred, in whole or in part, because Plaintiff has failed to plead any agreement between Elevance Health and any other Defendant to submit, cause the submission of, or conspire to submit any false or fraudulent claim.

Twenty-Fifth Affirmative Defense

To the extent Plaintiff seeks to impose liability on Elevance Health based on the acts, omissions, or statements of subsidiaries, affiliates, agents, brokers, vendors, contractors, or other third parties, such claims are barred by principles of corporate separateness and because Plaintiff has failed to plead any basis for veil piercing, alter-ego liability, agency liability, respondeat superior, or other derivative theory of liability as against Elevance Health.

Twenty-Sixth Affirmative Defense

The claims asserted against Elevance Health are barred, in whole or in part, because due process, fair notice principles, and the rule against retroactive imposition of liability preclude Plaintiff from imposing False Claims Act liability based on novel, changed, inconsistent, or inadequately expressed agency interpretations of statutes or regulations.

Twenty-Seventh Affirmative Defense

The claims asserted against Elevance Health are barred, in whole or in part, because the legal and regulatory standards on which Plaintiff relies are unconstitutionally vague as applied, fail to provide fair notice of the conduct alleged to be unlawful, and therefore cannot support the imposition of False Claims Act liability, penalties, or damages.

Twenty-Eighth Affirmative Defense

The claims asserted against Elevance Health are barred, in whole or in part, because Plaintiff lacked good cause to extend the seal period and/or failed timely to prosecute this action, and because the prolonged seal period and related delay caused substantial prejudice to Elevance Health in violation of due process.

Twenty-Ninth Affirmative Defense

The Government's claims are barred, in whole or in part, to the extent that the statutes it seeks to enforce, or the damages and penalties it seeks to recover, violate Defendants' constitutional rights, including under the Appointments, Vesting, Take Care, Excessive Fines, and Due Process clauses, or any other constitutional provision.

Thirtieth Affirmative Defense

The Government's claims are barred, in whole or in part, by the voluntary payment doctrine.

Thirty-First Affirmative Defense

The claims asserted against Elevance Health are barred, in whole or in part, because the beneficiaries at issue were eligible for Medicare Advantage coverage and the government was required to pay capitated amounts for those beneficiaries regardless of which insurer received them, such that Plaintiff suffered no cognizable loss and any recovery would result in an inequitable windfall.

Thirty-Second Affirmative Defense

The claims asserted against Elevance Health are barred, in whole or in part, because Plaintiff's alleged losses, if any, must be reduced, offset, diminished, or eliminated by amounts the United States did not pay, saved, recouped, or otherwise avoided paying, and by the value of the services, coverage, and benefits actually provided.

Thirty-Third Affirmative Defense

The claims asserted against Elevance Health are barred, in whole or in part, because Plaintiff failed to mitigate its alleged damages, if any.

Thirty-Fourth Affirmative Defense

The Complaint seeks relief against Elevance Health for conduct not fairly attributable to Elevance Health itself, and the claims are barred to the extent they rest on guilt by association, industry-wide allegations, generalized group pleading, or allegations that fail to distinguish among defendants.

Thirty-Fifth Affirmative Defense

The claims against Elevance Health are barred because any injuries sustained were the result of the United States' own conduct or the intervening conduct of third parties.

Thirty-Sixth Affirmative Defense

The claims against Elevance Health are barred because the United States did not suffer actual injury as it ratified, or otherwise consented to, the transactions and occurrences that are the subject of this action by continuing to pay Elevance Health for beneficiary claims relating to its MA contracts, despite its knowledge of such arrangements, including through regular disclosures.

Thirty-Seventh Affirmative Defense

The United States' claims are barred, in whole or in part, by the applicable statute of limitations.

Thirty-Eighth Affirmative Defense

Elevance Health reserves the right to assert additional defenses revealed through investigation, discovery, expert analysis, motion practice, or otherwise, including amendment of these defenses as justice requires.

Thirty-Ninth Affirmative Defense

Elevance Health will rely upon all affirmative or additional defenses that may become known to them or available during the course of this action and reserves the right, upon completion

of investigation and discovery, to amend or supplement the additional defenses contained herein as may be appropriate.

JURY DEMAND

Pursuant to Federal Rule of Civil Procedure 38, Elevance Health requests a trial by jury on all issues so triable.

Dated: May 22, 2026

Respectfully submitted,

/s/ Lisa M. Noller

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CERTIFICATE OF SERVICE

I, Lisa M. Noller, hereby certify that the foregoing was filed on May 22, 2026 through the ECF filing system and will be sent electronically to all counsel of record identified as registered participants on the associated Notice of Electronic Filing.

/s/ Lisa M. Noller

Lisa M. Noller