

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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

**DEFENDANT SELECTQUOTE, INC.'S ANSWER AND AFFIRMATIVE DEFENSES
TO COMPLAINT IN PARTIAL INTERVENTION OF THE
UNITED STATES OF AMERICA**

Defendant, SelectQuote, Inc. ("SelectQuote" or "Defendant"), by counsel, sets forth its Answer and Affirmative Defenses to the Complaint in Partial Intervention of the United States [ECF 41] ("Complaint") as follows:

GENERAL DENIALS

A. Pursuant to Fed. R. Civ. P. 8(b)(1)(3), Defendant generally denies all allegations of the Complaint except those, or parts of those, specifically admitted, and in so doing, denies any allegation, express or implied, that it has violated the Federal False Claims Act, 31 U.S.C. §§ 3729 *et seq.* ("FCA"), the Anti-Kickback Statute, 42 U.S.C. § 1320a-7b, or any other federal or state statute or regulation or any action brought at common law.

B. Defendant denies that the United States (the "Government") is entitled to the relief requested in the Complaint, or to any other relief.

C. In addition to denying any allegation that it has violated the law, Defendant affirmatively states that it has acted lawfully in all regards relevant to the matters alleged.

SelectQuote denies the allegations contained in the Preliminary Statement, except it admits that the Medicare Advantage program is established under federal law and that private insurers offer Medicare Advantage plans approved by CMS to eligible beneficiaries. SelectQuote further admits that Medicare beneficiaries may choose among numerous Medicare Advantage plans with differing provider networks, benefits, formularies, premiums, and cost-sharing arrangements. SelectQuote denies that it engaged in any unlawful kickback arrangement, improperly steered beneficiaries, discriminated against disabled beneficiaries, submitted or caused the submission of false claims, or violated any federal or state law. SelectQuote further denies that the United States is entitled to any of the requested relief.

1. Defendant admits the allegations of Paragraph 1.
2. Defendant admits the allegations of Paragraph 2.
3. Defendant denies the allegations of Paragraph 3.
4. Defendant admits the allegations of Paragraph 4.
5. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegation concerning Relator's residence or former employment. Defendant admits that Relator commenced this action in or about November 2021 pursuant to the *qui tam* provisions of the False Claims Act, 31 U.S.C. § 3730(b)(1). Defendant denies the remaining allegations in Paragraph 5.
6. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 6.
7. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 7.
8. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 8.
9. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 9.
10. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 10.
11. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 11.
12. Defendant admits the allegations of Paragraph 12.
13. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 13.

14. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 14.
15. Defendant admits the FCA was enacted in 1863. Defendant admits S. Rep. No. 99-345, at 1 (1986) and *United States v. Neifert-White Co.*, 390 U.S. 228, 232 (1968) contain the language referenced in Paragraph 15. Defendant denies the remaining allegations.
16. Defendant admits 31 U.S.C. § 3729(a)(1) contains the language quoted in Paragraph 16. Defendant denies the remaining allegations.
17. Defendant admits 31 U.S.C. § 3729(b)(1) contains the language quoted in Paragraph 17. Defendant denies the remaining allegations.
18. Defendant admits 31 U.S.C. § 3729(b)(2) contains the language quoted in Paragraph 18. Defendant denies the remaining allegations.
19. The allegations in Paragraph 19 constitute legal conclusions and Plaintiff's characterizations of CMS and Medicare Advantage statutes and regulations, to which no response is required. To the extent a response is deemed required, SelectQuote denies the allegations insofar as they are inconsistent with the applicable statutes and regulations or reflect Plaintiff's interpretation thereof.
20. Defendant admits 89 Fed. Reg. 9764 (Feb. 12, 2024) contains the penalties referenced in Paragraph 20. Defendant denies the remaining allegations.
21. Defendant admits the AKS was enacted in 1972 and denies the remaining allegations of Paragraph 21.
22. The allegations in Paragraph 22 constitute legal conclusions and Plaintiff's characterizations of CMS and Medicare Advantage statutes and regulations, to which no response is required. To the extent a response is deemed required, SelectQuote denies the allegations insofar as they are inconsistent with the applicable statutes and regulations or reflect Plaintiff's interpretation thereof.
23. Defendant admits 42 U.S.C. § 1320a-7b(b) contains the statement quoted in Paragraph 23. Defendant denies the remaining allegations.
24. The allegations in Paragraph 24 constitute legal conclusions and Plaintiff's characterizations of CMS and Medicare Advantage statutes and regulations, to which no response is required. To the extent a response is deemed required, SelectQuote denies the allegations insofar as they are inconsistent with the applicable statutes and regulations or reflect Plaintiff's interpretation thereof.
25. The allegations in Paragraph 25 constitute legal conclusions and Plaintiff's characterizations of CMS and Medicare Advantage statutes and regulations, to which no response is required. To the extent a response is deemed required, SelectQuote denies the allegations insofar as they are inconsistent with the applicable statutes and regulations or reflect Plaintiff's interpretation thereof.

26. The allegations in Paragraph 26 constitute legal conclusions and Plaintiff's characterizations of CMS and Medicare Advantage statutes and regulations, to which no response is required. To the extent a response is deemed required, SelectQuote denies the allegations insofar as they are inconsistent with the applicable statutes and regulations or reflect Plaintiff's interpretation thereof.
27. Defendant admits 42 U.S.C. § 1320a-7b(f) contains the statements quoted in Paragraph 27. Defendant denies the remaining allegations.
28. Defendant admits 42 U.S.C. § 1320a-7b(h) contains the statement quoted in Paragraph 28. Defendant denies the remaining allegations.
29. Defendant admits *Guilfoile v. Shields*, 913 F.3d 178, 189 (1st Cir. 2019) contains the language quoted in Paragraph 29. Defendant denies the remaining allegations.
30. Defendant admits 42 U.S.C. § 1320a-7b(g) contains the language quoted in Paragraph 30. Defendant denies the remaining allegations.
31. Defendant admits *Guilfoile v. Shields*, 913 F.3d at 190-91 contains the language quoted in Paragraph 31. Defendant denies the remaining allegations.
32. Defendant admits *United States v. Regeneron Pharms., Inc.*, 128 F.4th 324, 333 (1st Cir. 2025) and *Universal Health Servs., Inc. v. United States*, 579 U.S.176, 190 (2016) contain the language quoted in Paragraph 32. Defendant denies the remaining allegations.
33. Defendant admits that the Government has brought enforcement actions alleging violations of the AKS and FCA. Defendant otherwise denies the allegations in Paragraph 33.
34. Defendant admits the allegations of Paragraph 34.
35. Defendant admits the allegations of Paragraph 35.
36. Defendant admits the allegations of Paragraph 36.
37. Defendant admits the allegations of Paragraph 37.
38. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 38.
39. Defendant admits that MAOs contract with CMS in connection with Medicare Advantage plans and denies the remaining allegations of Paragraph 39.
40. Defendant admits the allegations of Paragraph 40.
41. The allegations in Paragraph 41 constitute legal conclusions and Plaintiff's characterizations of statutes and regulations, to which no response is required. To the

- extent a response is deemed required, SelectQuote denies the allegations insofar as they are inconsistent with the applicable statutes and regulations or reflect Plaintiff's interpretation thereof.
42. The allegations in Paragraph 42 constitute legal conclusions and Plaintiff's characterizations of statutes and regulations, to which no response is required. To the extent a response is deemed required, SelectQuote denies the allegations insofar as they are inconsistent with the applicable statutes and regulations or reflect Plaintiff's interpretation thereof.
 43. The allegations in Paragraph 43 constitute legal conclusions and Plaintiff's characterizations of statutes and regulations, to which no response is required. To the extent a response is deemed required, SelectQuote denies the allegations insofar as they are inconsistent with the applicable statutes and regulations or reflect Plaintiff's interpretation thereof.
 44. The allegations in Paragraph 44 constitute legal conclusions and Plaintiff's characterizations of statutes and regulations, to which no response is required. To the extent a response is deemed required, SelectQuote denies the allegations insofar as they are inconsistent with the applicable statutes and regulations or reflect Plaintiff's interpretation thereof.
 45. The allegations in Paragraph 45 constitute legal conclusions and Plaintiff's characterizations of statutes and regulations, to which no response is required. To the extent a response is deemed required, SelectQuote denies the allegations insofar as they are inconsistent with the applicable statutes and regulations or reflect Plaintiff's interpretation thereof.
 46. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 46.
 47. The allegations in Paragraph 47 constitute legal conclusions and Plaintiff's characterizations of statutes and regulations, to which no response is required. To the extent a response is deemed required, SelectQuote denies the allegations insofar as they are inconsistent with the applicable statutes and regulations or reflect Plaintiff's interpretation thereof.
 48. The allegations in Paragraph 48 constitute legal conclusions and Plaintiff's characterizations of statutes and regulations, to which no response is required. To the extent a response is deemed required, SelectQuote denies the allegations insofar as they are inconsistent with the applicable statutes and regulations or reflect Plaintiff's interpretation thereof.
 49. The allegations in Paragraph 49 constitute legal conclusions and Plaintiff's characterizations of statutes and regulations, to which no response is required. To the extent a response is deemed required, SelectQuote denies the allegations insofar as they are inconsistent with the applicable statutes and regulations or reflect Plaintiff's interpretation thereof.

50. The allegations in Paragraph 50 constitute legal conclusions and Plaintiff's characterizations of statutes and regulations, to which no response is required. To the extent a response is deemed required, SelectQuote denies the allegations insofar as they are inconsistent with the applicable statutes and regulations or reflect Plaintiff's interpretation thereof.
51. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 51.
52. Defendant admits the allegations of Paragraph 52.
53. Defendant admits it is appointed by MAOs to offer agreed plans. Defendant denies all remaining allegations. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 53 directed to other parties and on that basis denies the allegations.
54. Defendant admits that SelectQuote created and/or published marketing materials for its business operations. Defendant denies the remaining allegations of Paragraph 54. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 54 directed to other parties and on that basis denies the allegations.
55. Defendant admits the allegations of Paragraph 55 solely as they relate to SelectQuote. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 55 directed to other parties and on that basis denies the allegations.
56. Defendant admits the allegations of Paragraph 56 solely as they relate to SelectQuote. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 56 directed to other parties and on that basis denies the allegations.
57. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 57.
58. Defendant admits that Medicare beneficiaries often contacted SelectQuote through the telephone and that it operated an online platform. Medicare beneficiaries voluntarily provided biological and health information and enrollments applications were only submitted with consent. Defendant denies all remaining allegations of Paragraph 58. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 58 directed to other parties and on that basis denies the allegations.
59. Defendant denies the allegations of Paragraph 59. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 59 directed to other parties and on that basis denies the allegations.

60. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 60.
61. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 61.
62. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 62.
63. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 63.
64. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 64.
65. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 65.
66. Defendant admits that SelectQuote attempted to appropriately match licensed insurance agents, who are licensed by state, with beneficiaries based upon the residence of the beneficiary. Defendant denies the remaining allegations of Paragraph 66.
67. Defendant admits that 73 Fed. Reg. 28556, 28583 (May 16, 2008) contains the quoted language. Defendant denies the remaining allegations.
68. Defendant denies the allegations of Paragraph 68. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 68 directed to other parties and on that basis denies the allegations.
69. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 69.
70. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 70.
71. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 71.
72. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 72.
73. Defendant admits its Registration Statement with the U.S. Securities and Exchange Commission contains the language quoted in Paragraph 73 as to SelectQuote Senior. Defendant denies the remaining allegations.
74. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 74.

75. The allegations in Paragraph 75 constitute legal conclusions and Plaintiff's characterizations of CMS and Medicare Advantage statutes and regulations, to which no response is required. To the extent a response is deemed required, SelectQuote denies the allegations insofar as they are inconsistent with the applicable statutes and regulations or reflect Plaintiff's interpretation thereof.
76. The allegations in Paragraph 76 constitute legal conclusions and Plaintiff's characterizations of CMS and Medicare Advantage statutes and regulations, to which no response is required. To the extent a response is deemed required, SelectQuote denies the allegations insofar as they are inconsistent with the applicable statutes and regulations or reflect Plaintiff's interpretation thereof.
77. The allegations in Paragraph 77 constitute legal conclusions and Plaintiff's characterizations of CMS and Medicare Advantage statutes and regulations, to which no response is required. To the extent a response is deemed required, SelectQuote denies the allegations insofar as they are inconsistent with the applicable statutes and regulations or reflect Plaintiff's interpretation thereof.
78. Defendant denies the allegations of Paragraph 78.
79. The allegations in Paragraph 79 constitute legal conclusions and Plaintiff's characterizations of CMS and Medicare Advantage statutes and regulations, to which no response is required. To the extent a response is deemed required, SelectQuote denies the allegations insofar as they are inconsistent with the applicable statutes and regulations or reflect Plaintiff's interpretation thereof.
80. The allegations in Paragraph 80 constitute legal conclusions and Plaintiff's characterizations of CMS and Medicare Advantage statutes and regulations, to which no response is required. To the extent a response is deemed required, SelectQuote denies the allegations insofar as they are inconsistent with the applicable statutes and regulations or reflect Plaintiff's interpretation thereof.
81. The allegations in Paragraph 81 constitute legal conclusions and Plaintiff's characterizations of CMS and Medicare Advantage statutes and regulations, to which no response is required. To the extent a response is deemed required, SelectQuote denies the allegations insofar as they are inconsistent with the applicable statutes and regulations or reflect Plaintiff's interpretation thereof.
82. The allegations in Paragraph 82 constitute legal conclusions and Plaintiff's characterizations of CMS and Medicare Advantage statutes and regulations, to which no response is required. To the extent a response is deemed required, SelectQuote denies the allegations insofar as they are inconsistent with the applicable statutes and regulations or reflect Plaintiff's interpretation thereof.
83. The allegations in Paragraph 83 constitute legal conclusions and Plaintiff's characterizations of CMS and Medicare Advantage statutes and regulations, to which no response is required. To the extent a response is deemed required, SelectQuote

- denies the allegations insofar as they are inconsistent with the applicable statutes and regulations or reflect Plaintiff's interpretation thereof.
84. The allegations in Paragraph 84 constitute legal conclusions and Plaintiff's characterizations of CMS and Medicare Advantage statutes and regulations, to which no response is required. To the extent a response is deemed required, SelectQuote denies the allegations insofar as they are inconsistent with the applicable statutes and regulations or reflect Plaintiff's interpretation thereof.
 85. The allegations in Paragraph 85 constitute legal conclusions and Plaintiff's characterizations of CMS and Medicare Advantage statutes and regulations, to which no response is required. To the extent a response is deemed required, SelectQuote denies the allegations insofar as they are inconsistent with the applicable statutes and regulations or reflect Plaintiff's interpretation thereof.
 86. The allegations in Paragraph 86 constitute legal conclusions and Plaintiff's characterizations of CMS and Medicare Advantage statutes and regulations, to which no response is required. To the extent a response is deemed required, SelectQuote denies the allegations insofar as they are inconsistent with the applicable statutes and regulations or reflect Plaintiff's interpretation thereof.
 87. The allegations in Paragraph 87 constitute legal conclusions and Plaintiff's characterizations of CMS and Medicare Advantage statutes and regulations, to which no response is required. To the extent a response is deemed required, SelectQuote denies the allegations insofar as they are inconsistent with the applicable statutes and regulations or reflect Plaintiff's interpretation thereof.
 88. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 88.
 89. Defendant admits 42 U.S.C. § 1395w-22(b)(1) contains the statement quoted in Paragraph 89. Defendant denies the remaining allegations.
 90. Defendant admits 42 C.F.R. § 422.110(a)(7) contains the statement quoted in Paragraph 90. Defendant denies the remaining allegations.
 91. The allegations in Paragraph 91 constitute legal conclusions and Plaintiff's characterizations of CMS and Medicare Advantage statutes and regulations, to which no response is required. To the extent a response is deemed required, SelectQuote denies the allegations insofar as they are inconsistent with the applicable statutes and regulations or reflect Plaintiff's interpretation thereof.
 92. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 92.
 93. Defendant admits 42 C.F.R. § 422.504 contains the statement quoted in Paragraph 93. Defendant denies the remaining allegations.

94. Defendant admits 42 C.F.R. § 422.504(a)(2) contains the statement quoted in Paragraph 94. Defendant denies the remaining allegations.
95. The allegations in Paragraph 95 constitute legal conclusions and Plaintiff's characterizations of CMS and Medicare Advantage statutes and regulations, to which no response is required. To the extent a response is deemed required, SelectQuote denies the allegations insofar as they are inconsistent with the applicable statutes and regulations or reflect Plaintiff's interpretation thereof.
96. Defendant admits 42 C.F.R. § 422.504(l)(1) contains the statement quoted in Paragraph 96. Defendant denies the remaining allegations.
97. Defendant denies the allegations of Paragraph 97.
98. Defendant denies the allegations of Paragraph 98. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 98 directed to other parties and on that basis denies the allegations.
99. Defendant denies the allegations of Paragraph 99. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 99 directed to other parties and on that basis denies the allegations.
100. Defendant denies the allegations of Paragraph 100. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 100 directed to other parties and on that basis denies the allegations.
101. Defendant denies the allegations of Paragraph 101. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 101 directed to other parties and on that basis denies the allegations.
102. Defendant denies the allegations of Paragraph 102.
103. Defendant denies the allegations of Paragraph 103. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 103 directed to other parties and on that basis denies the allegations.
104. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 104.
105. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 105.
106. Defendant denies the allegations of Paragraph 106. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 106 directed to other parties and on that basis denies the allegations.
107. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 107.

108. Defendant denies the allegations of Paragraph 108.
109. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 109.
110. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 110.
111. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 111 directed to other parties and on that basis denies the allegations.
112. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 112 directed to other parties and on that basis denies the allegations.
113. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 113 directed to other parties and on that basis denies the allegations.
114. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 114 directed to other parties and on that basis denies the allegations.
115. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 115 directed to other parties and on that basis denies the allegations.
116. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 116 directed to other parties and on that basis denies the allegations.
117. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 117 directed to other parties and on that basis denies the allegations.
118. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 118 directed to other parties and on that basis denies the allegations.
119. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 119 directed to other parties and on that basis denies the allegations.
120. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 120 directed to other parties and on that basis denies the allegations.

121. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 121 directed to other parties and on that basis denies the allegations.
122. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 122 directed to other parties and on that basis denies the allegations.
123. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 123 directed to other parties and on that basis denies the allegations.
124. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 124 directed to other parties and on that basis denies the allegations.
125. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 125 directed to other parties and on that basis denies the allegations.
126. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 126 directed to other parties and on that basis denies the allegations.
127. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 127 directed to other parties and on that basis denies the allegations.
128. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 128 directed to other parties and on that basis denies the allegations.
129. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 129 directed to other parties and on that basis denies the allegations.
130. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 130 directed to other parties and on that basis denies the allegations.
131. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 131 directed to other parties and on that basis denies the allegations.
132. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 132 directed to other parties and on that basis denies the allegations.

133. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 133 directed to other parties and on that basis denies the allegations.
134. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 134 directed to other parties and on that basis denies the allegations.
135. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 135 directed to other parties and on that basis denies the allegations.
136. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 136 directed to other parties and on that basis denies the allegations.
137. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 137 directed to other parties and on that basis denies the allegations.
138. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 138 directed to other parties and on that basis denies the allegations.
139. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 139 directed to other parties and on that basis denies the allegations.
140. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 140 directed to other parties and on that basis denies the allegations.
141. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 141 directed to other parties and on that basis denies the allegations.
142. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 142 directed to other parties and on that basis denies the allegations.
143. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 143 directed to other parties and on that basis denies the allegations.
144. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 144 directed to other parties and on that basis denies the allegations.

145. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 145 directed to other parties and on that basis denies the allegations.
146. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 146 directed to other parties and on that basis denies the allegations.
147. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 147 directed to other parties and on that basis denies the allegations.
148. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 148 directed to other parties and on that basis denies the allegations.
149. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 149 directed to other parties and on that basis denies the allegations.
150. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 150 directed to other parties and on that basis denies the allegations.
151. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 151 directed to other parties and on that basis denies the allegations.
152. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 152 directed to other parties and on that basis denies the allegations.
153. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 153 directed to other parties and on that basis denies the allegations.
154. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 154 directed to other parties and on that basis denies the allegations.
155. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 155 directed to other parties and on that basis denies the allegations.
156. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 156 directed to other parties and on that basis denies the allegations.

157. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 157 directed to other parties and on that basis denies the allegations.
158. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 158 directed to other parties and on that basis denies the allegations.
159. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 159 directed to other parties and on that basis denies the allegations.
160. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 160 directed to other parties and on that basis denies the allegations.
161. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 161 directed to other parties and on that basis denies the allegations.
162. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 162 directed to other parties and on that basis denies the allegations.
163. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 163 directed to other parties and on that basis denies the allegations.
164. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 164 directed to other parties and on that basis denies the allegations.
165. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 165 directed to other parties and on that basis denies the allegations.
166. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 166 directed to other parties and on that basis denies the allegations.
167. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 167 directed to other parties and on that basis denies the allegations.
168. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 168 directed to other parties and on that basis denies the allegations.

169. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 169 directed to other parties and on that basis denies the allegations.
170. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 170 directed to other parties and on that basis denies the allegations.
171. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 171 directed to other parties and on that basis denies the allegations.
172. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 172 directed to other parties and on that basis denies the allegations.
173. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 173 directed to other parties and on that basis denies the allegations.
174. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 174 directed to other parties and on that basis denies the allegations.
175. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 175 directed to other parties and on that basis denies the allegations.
176. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 176 directed to other parties and on that basis denies the allegations.
177. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 177 directed to other parties and on that basis denies the allegations.
178. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 178 directed to other parties and on that basis denies the allegations.
179. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 179 directed to other parties and on that basis denies the allegations.
180. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 180 directed to other parties and on that basis denies the allegations.

181. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 181 directed to other parties and on that basis denies the allegations.
182. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 182 directed to other parties and on that basis denies the allegations.
183. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 183 directed to other parties and on that basis denies the allegations.
184. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 184 directed to other parties and on that basis denies the allegations.
185. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 185 directed to other parties and on that basis denies the allegations.
186. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 186 directed to other parties and on that basis denies the allegations.
187. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 187 directed to other parties and on that basis denies the allegations.
188. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 188 directed to other parties and on that basis denies the allegations.
189. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 189 directed to other parties and on that basis denies the allegations.
190. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 190 directed to other parties and on that basis denies the allegations.
191. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 191 directed to other parties and on that basis denies the allegations.
192. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 192 directed to other parties and on that basis denies the allegations.

193. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 193 directed to other parties and on that basis denies the allegations.
194. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 194 directed to other parties and on that basis denies the allegations.
195. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 195 directed to other parties and on that basis denies the allegations.
196. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 196 directed to other parties and on that basis denies the allegations.
197. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 197 directed to other parties and on that basis denies the allegations.
198. Defendant admits that SelectQuote and Humana entered into lawful commercial agreements relating to Medicare Advantage marketing and brokerage services. Defendant admits it received payment pursuant to those lawful commercial agreements. Defendant denies the remaining allegations in Paragraph 198.
199. Defendant denies the allegations of Paragraph 199.
200. Defendant denies the allegations of Paragraph 200.
201. Defendant admits that SelectQuote and Humana entered into lawful commercial agreements relating to Medicare Advantage marketing and brokerage services. Defendant admits it received payment pursuant to those lawful commercial agreements. Defendant denies the remaining allegations in Paragraph 201.
202. Defendant denies the allegations of Paragraph 202.
203. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 203.
204. Paragraph 204 purports to quote or characterize documents that speak for themselves. SelectQuote denies the allegations contained in Paragraph 204.
205. Defendant denies the allegations of Paragraph 205.
206. Defendant denies the allegations of Paragraph 206.
207. Defendant denies the allegations of Paragraph 207.

208. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 208.
209. Defendant denies the allegations of Paragraph 209.
210. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations of Paragraph 210.
211. Defendant denies the allegations of Paragraph 211.
212. Defendant denies the allegations of Paragraph 212.
213. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 213 directed to other parties and on that basis denies the allegations.
214. Paragraph 214 purports to quote or characterize documents that speak for themselves. SelectQuote denies the allegations contained in Paragraph 214.
215. Defendant admits Humana and SelectQuote entered into agreements for marketing and/or brokerage activities during the relevant period. Defendant denies the remaining allegations of Paragraph 215.
216. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 216 directed to other parties and on that basis denies the allegations.
217. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 217 directed to other parties and on that basis denies the allegations.
218. Paragraph 218 purports to quote or characterize documents that speak for themselves. SelectQuote denies the allegations contained in Paragraph 218.
219. Defendant denies the allegations of Paragraph 219.
220. Defendant denies the allegations of Paragraph 220.
221. Paragraph 221 purports to quote or characterize documents that speak for themselves. SelectQuote denies the allegations contained in Paragraph 221.
222. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 222 and therefore denies them.
223. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 223 directed to other parties and on that basis denies the allegations.
224. Defendant denies the allegations of Paragraph 224.

225. Defendant denies the allegations of Paragraph 225.
226. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of Paragraph 226 and on that basis denies the allegations.
227. Defendant denies the allegations of Paragraph 227 as to SelectQuote and lacks knowledge or information sufficient to form a belief about the truth of remaining allegations.
228. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 228 directed to other parties and on that basis denies the allegations.
229. Paragraph 229 purports to quote or characterize documents that speak for themselves. SelectQuote denies the allegations contained in Paragraph 229.
230. Paragraph 230 purports to quote or characterize documents that speak for themselves. SelectQuote denies the allegations contained in Paragraph 230.
231. Defendant denies the allegations of Paragraph 231.
232. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 232 directed to other parties and on that basis denies the allegations.
233. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 233 directed to other parties and on that basis denies the allegations.
234. Defendant denies the allegations of Paragraph 234.
235. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 235 directed to other parties and on that basis denies the allegations.
236. Defendant denies the allegations of Paragraph 236.
237. Defendant denies the allegations of Paragraph 237.
238. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 238 directed to other parties and on that basis denies the allegations.
239. Paragraph 239 purports to quote or characterize documents that speak for themselves. SelectQuote denies the allegations contained in Paragraph 239.
240. Paragraph 240 purports to quote or characterize documents that speak for themselves. SelectQuote denies the allegations contained in Paragraph 240.

241. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 241 directed to other parties and on that basis denies the allegations.
242. Defendant denies the allegations of Paragraph 242.
243. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of Paragraph 243 and on that basis denies the allegations.
244. Defendant denies the allegations of Paragraph 244.
245. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 245 directed to other parties and on that basis denies the allegations.
246. Paragraph 246 purports to quote or characterize documents that speak for themselves. SelectQuote denies the allegations contained in Paragraph 246.
247. Defendant denies the allegations of Paragraph 247.
248. Defendant denies the allegations of Paragraph 248.
249. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 249 directed to other parties and on that basis denies the allegations.
250. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 250 directed to other parties and on that basis denies the allegations.
251. Defendant admits SelectQuote received payment from Humana for marketing and/or brokerage activities during the relevant period. Defendant denies the remaining allegations of Paragraph 251.
252. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 252 directed to other parties and on that basis denies the allegations.
253. Defendant denies the allegations of Paragraph 253.
254. Paragraph 254 purports to quote or characterize documents that speak for themselves. SelectQuote denies the allegations contained in Paragraph 254.
255. Defendant denies the allegations of Paragraph 255.
256. Paragraph 256 purports to quote or characterize documents that speak for themselves. SelectQuote denies the allegations contained in Paragraph 256.

257. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 257 directed to other parties and on that basis denies the allegations.
258. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 258 directed to other parties and on that basis denies the allegations.
259. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 259 directed to other parties and on that basis denies the allegations.
260. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 260 directed to other parties and on that basis denies the allegations.
261. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 261 directed to other parties and on that basis denies the allegations.
262. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 262 directed to other parties and on that basis denies the allegations.
263. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 263 directed to other parties and on that basis denies the allegations.
264. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 264 directed to other parties and on that basis denies the allegations.
265. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 265 directed to other parties and on that basis denies the allegations.
266. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 266 directed to other parties and on that basis denies the allegations.
267. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 267 directed to other parties and on that basis denies the allegations.
268. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 268 directed to other parties and on that basis denies the allegations.

269. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 269 directed to other parties and on that basis denies the allegations.
270. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 270 directed to other parties and on that basis denies the allegations.
271. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 271 directed to other parties and on that basis denies the allegations.
272. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 272 directed to other parties and on that basis denies the allegations.
273. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 273 directed to other parties and on that basis denies the allegations.
274. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 274 directed to other parties and on that basis denies the allegations.
275. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 275 directed to other parties and on that basis denies the allegations.
276. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 276 directed to other parties and on that basis denies the allegations.
277. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 277 directed to other parties and on that basis denies the allegations.
278. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 278 directed to other parties and on that basis denies the allegations.
279. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 279 directed to other parties and on that basis denies the allegations.
280. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 280 directed to other parties and on that basis denies the allegations.

281. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 281 directed to other parties and on that basis denies the allegations.
282. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 282 directed to other parties and on that basis denies the allegations.
283. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 283 directed to other parties and on that basis denies the allegations.
284. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 284 directed to other parties and on that basis denies the allegations.
285. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 285 directed to other parties and on that basis denies the allegations.
286. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 286 directed to other parties and on that basis denies the allegations.
287. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 287 directed to other parties and on that basis denies the allegations.
288. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 288 directed to other parties and on that basis denies the allegations.
289. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 289 directed to other parties and on that basis denies the allegations.
290. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 290 directed to other parties and on that basis denies the allegations.
291. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 291 directed to other parties and on that basis denies the allegations.
292. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 292 directed to other parties and on that basis denies the allegations.

293. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 293 directed to other parties and on that basis denies the allegations.
294. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 294 directed to other parties and on that basis denies the allegations.
295. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 295 directed to other parties and on that basis denies the allegations.
296. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 296 directed to other parties and on that basis denies the allegations.
297. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 297 directed to other parties and on that basis denies the allegations.
298. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 298 directed to other parties and on that basis denies the allegations.
299. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 299 directed to other parties and on that basis denies the allegations.
300. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 300 directed to other parties and on that basis denies the allegations.
301. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 301 directed to other parties and on that basis denies the allegations.
302. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 302 directed to other parties and on that basis denies the allegations.
303. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 303 directed to other parties and on that basis denies the allegations.
304. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 304 directed to other parties and on that basis denies the allegations.

305. Defendant denies the allegations of Paragraph 305. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations directed to other parties and on that basis denies the allegations.
306. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 306 directed to other parties and on that basis denies the allegations.
307. Defendant denies the allegations of Paragraph 307.
308. Paragraph 308 purports to quote or characterize documents that speak for themselves. SelectQuote denies the allegations contained in Paragraph 308.
309. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 309 directed to other parties and on that basis denies the allegations.
310. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 310 directed to other parties and on that basis denies the allegations.
311. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 311 directed to other parties and on that basis denies the allegations.
312. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 312 directed to other parties and on that basis denies the allegations.
313. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 313 directed to other parties and on that basis denies the allegations.
314. Defendant denies the allegations contained in Paragraph 314, including the allegation that SelectQuote discriminated against disabled Medicare beneficiaries, engaged in any illegal conduct, or otherwise violated any applicable law or regulation. To the extent the Paragraph states legal conclusions, no response is required; to the extent a response is deemed required, Defendant denies the same. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 314 directed to other parties and on that basis denies the allegations.
315. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 315 directed to other parties and on that basis denies the allegations.
316. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 316 directed to other parties and on that basis denies the allegations.

317. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 317 directed to other parties and on that basis denies the allegations.
318. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 318 directed to other parties and on that basis denies the allegations.
319. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 319 directed to other parties and on that basis denies the allegations.
320. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 320 directed to other parties and on that basis denies the allegations.
321. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 321 directed to other parties and on that basis denies the allegations.
322. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 322 directed to other parties and on that basis denies the allegations.
323. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 323 directed to other parties and on that basis denies the allegations.
324. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 324 directed to other parties and on that basis denies the allegations.
325. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 325 directed to other parties and on that basis denies the allegations.
326. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 326 directed to other parties and on that basis denies the allegations.
327. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 327 directed to other parties and on that basis denies the allegations.
328. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 328 directed to other parties and on that basis denies the allegations.

329. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 329 directed to other parties and on that basis denies the allegations.
330. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 330 directed to other parties and on that basis denies the allegations.
331. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 331 directed to other parties and on that basis denies the allegations.
332. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 332 directed to other parties and on that basis denies the allegations.
333. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations of Paragraph 333.
334. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 334 directed to other parties and on that basis denies the allegations.
335. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 335 directed to other parties and on that basis denies the allegations.
336. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 336 directed to other parties and on that basis denies the allegations.
337. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 337 directed to other parties and on that basis denies the allegations.
338. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 338 directed to other parties and on that basis denies the allegations.
339. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 339 directed to other parties and on that basis denies the allegations. Defendant denies the remaining allegations of Paragraph 339.
340. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 340 directed to other parties and on that basis denies the allegations.

341. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 341 directed to other parties and on that basis denies the allegations.
342. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 342 directed to other parties and on that basis denies the allegations.
343. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 343 directed to other parties and on that basis denies the allegations.
344. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 344 directed to other parties and on that basis denies the allegations.
345. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 345 directed to other parties and on that basis denies the allegations.
346. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 346 directed to other parties and on that basis denies the allegations.
347. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 347 directed to other parties and on that basis denies the allegations.
348. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 348 directed to other parties and on that basis denies the allegations.
349. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 349 directed to other parties and on that basis denies the allegations.
350. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 350 directed to other parties and on that basis denies the allegations.
351. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 351 directed to other parties and on that basis denies the allegations.
352. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 352 directed to other parties and on that basis denies the allegations.

353. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 353 directed to other parties and on that basis denies the allegations.
354. Defendant denies the allegations of Paragraph 354.
355. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 355 directed to other parties and on that basis denies the allegations.
356. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 356 directed to other parties and on that basis denies the allegations.
357. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 357 directed to other parties and on that basis denies the allegations.
358. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 358 directed to other parties and on that basis denies the allegations.
359. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 359 directed to other parties and on that basis denies the allegations.
360. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 360 directed to other parties and on that basis denies the allegations.
361. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 361 directed to other parties and on that basis denies the allegations.
362. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 362 directed to other parties and on that basis denies the allegations.
363. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 363 directed to other parties and on that basis denies the allegations.
364. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 364 directed to other parties and on that basis denies the allegations.

365. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 365 directed to other parties and on that basis denies the allegations.
366. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 366 directed to other parties and on that basis denies the allegations.
367. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 367 directed to other parties and on that basis denies the allegations.
368. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 368.
369. Paragraph 369 purports to quote or characterize documents that speak for themselves. SelectQuote denies the allegations contained in Paragraph 369.
370. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 370 directed to other parties and on that basis denies the allegations.
371. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 371 directed to other parties and on that basis denies the allegations.
372. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 372 directed to other parties and on that basis denies the allegations.
373. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 373 directed to other parties and on that basis denies the allegations.
374. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 374 directed to other parties and on that basis denies the allegations.
375. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 375 directed to other parties and on that basis denies the allegations.
376. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 376 directed to other parties and on that basis denies the allegations.

377. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 377 directed to other parties and on that basis denies the allegations.
378. Defendant denies the allegations of Paragraph 378 as to SelectQuote and lacks sufficient knowledge or information to form a belief as to other parties.
379. Defendant admits that SelectQuote and Aetna entered into lawful commercial agreements relating to Medicare Advantage marketing and brokerage services. Defendant admits it received payment pursuant to those lawful commercial agreements. Defendant denies the remaining allegations in Paragraph 379.
380. Defendant denies the allegations of Paragraph 380 as to SelectQuote and lacks knowledge or information sufficient to form a belief about the truth of allegations as to other parties.
381. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 381 directed to other parties and on that basis denies the allegations.
382. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 382 directed to other parties and on that basis denies the allegations.
383. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 383 directed to other parties and on that basis denies the allegations.
384. Defendant denies the allegations of Paragraph 384 as to SelectQuote and lacks knowledge or information sufficient to form a belief about the truth of allegations as to other parties.
385. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 385 directed to other parties and on that basis denies the allegations.
386. Defendant denies the allegations in Paragraph 386 as to SelectQuote. Defendant lacks knowledge or information sufficient to form a belief as the remaining allegations in Paragraph 386.
387. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 387 directed to other parties and on that basis denies the allegations.
388. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 388 directed to other parties and on that basis denies the allegations.

389. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 389 directed to other parties and on that basis denies the allegations.
390. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 390 directed to other parties and on that basis denies the allegations.
391. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 391 directed to other parties and on that basis denies the allegations.
392. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 392 directed to other parties and on that basis denies the allegations.
393. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 393 directed to other parties and on that basis denies the allegations.
394. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 394 directed to other parties and on that basis denies the allegations.
395. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 395 directed to other parties and on that basis denies the allegations.
396. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 396 directed to other parties and on that basis denies the allegations.
397. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 397 directed to other parties and on that basis denies the allegations.
398. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 398 directed to other parties and on that basis denies the allegations.
399. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 399 directed to other parties and on that basis denies the allegations.
400. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 400 directed to other parties and on that basis denies the allegations.

401. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 401 directed to other parties and on that basis denies the allegations.
402. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 402 directed to other parties and on that basis denies the allegations.
403. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 403 directed to other parties and on that basis denies the allegations.
404. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 404 directed to other parties and on that basis denies the allegations.
405. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 405 directed to other parties and on that basis denies the allegations.
406. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 406 directed to other parties and on that basis denies the allegations.
407. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 407 directed to other parties and on that basis denies the allegations.
408. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 408 directed to other parties and on that basis denies the allegations.
409. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 409 directed to other parties and on that basis denies the allegations.
410. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 410 directed to other parties and on that basis denies the allegations.
411. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 411 directed to other parties and on that basis denies the allegations.
412. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 412 directed to other parties and on that basis denies the allegations.

413. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 413 directed to other parties and on that basis denies the allegations.
414. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 414 directed to other parties and on that basis denies the allegations.
415. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 415 directed to other parties and on that basis denies the allegations.
416. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 416 directed to other parties and on that basis denies the allegations.
417. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 417 directed to other parties and on that basis denies the allegations.
418. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 418 directed to other parties and on that basis denies the allegations.
419. Defendant denies the allegations in Paragraph 419 as to SelectQuote. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 419 directed to other parties and on that basis denies the allegations.
420. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 420 directed to other parties and on that basis denies the allegations.
421. Defendant denies the allegations of Paragraph 421.
422. Paragraph 422 purports to quote or characterize documents that speak for themselves. SelectQuote denies the allegations contained in Paragraph 422.
423. Defendant denies the allegations of Paragraph 423.
424. Defendant denies the allegations of Paragraph 424.
425. Defendant denies the allegations of Paragraph 425.
426. Defendant denies the allegations of Paragraph 426.
427. Defendant admits that SelectQuote and Aetna entered into lawful commercial agreements relating to Medicare Advantage marketing and brokerage services.

- Defendant admits it received payment pursuant to those lawful commercial agreements. Defendant denies the remaining allegations in Paragraph 427.
428. Defendant denies the allegations of Paragraph 428.
429. Paragraph 429 purports to quote or characterize documents that speak for themselves. SelectQuote denies the allegations contained in Paragraph 429.
430. Defendant denies the allegations of Paragraph 430.
431. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 431 and therefore denies them.
432. Paragraph 432 purports to quote or characterize documents that speak for themselves. SelectQuote denies the allegations contained in Paragraph 432.
433. Paragraph 433 purports to quote or characterize documents that speak for themselves. SelectQuote denies the allegations contained in Paragraph 433.
434. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 434.
435. Defendant denies the allegations of Paragraph 435.
436. Defendant denies the allegations of Paragraph 436.
437. Defendant admits that SelectQuote and Aetna entered into lawful commercial agreements relating to Medicare Advantage marketing and brokerage services. Defendant admits it received payment pursuant to those lawful commercial agreements. Defendant denies the remaining allegations in Paragraph 437.
438. Defendant denies the allegations of Paragraph 438.
439. Paragraph 439 purports to quote or characterize documents that speak for themselves. SelectQuote denies the allegations contained in Paragraph 439.
440. Defendant denies the allegations of Paragraph 440.
441. Paragraph 441 purports to quote or characterize documents that speak for themselves. SelectQuote denies the allegations contained in Paragraph 441.
442. Defendant denies the allegations of Paragraph 442.
443. Defendant denies the allegations of Paragraph 443.
444. Paragraph 444 purports to quote or characterize documents that speak for themselves. SelectQuote denies the allegations contained in Paragraph 444.

445. Paragraph 445 purports to quote or characterize documents that speak for themselves. SelectQuote denies the allegations contained in Paragraph 445.
446. Paragraph 446 purports to quote or characterize documents that speak for themselves. SelectQuote denies the allegations contained in Paragraph 446.
447. Defendant denies the allegations of Paragraph 447.
448. Paragraph 448 purports to quote or characterize documents that speak for themselves. SelectQuote denies the allegations contained in Paragraph 448.
449. Paragraph 449 purports to quote or characterize documents that speak for themselves. SelectQuote denies the allegations contained in Paragraph 449.
450. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations of Paragraph 450.
451. Defendant admits that SelectQuote and Aetna entered into lawful commercial agreements relating to Medicare Advantage marketing and brokerage services. Defendant admits it received payment pursuant to those lawful commercial agreements. Defendant denies the remaining allegations in Paragraph 451.
452. Paragraph 452 purports to quote or characterize documents that speak for themselves. SelectQuote denies the allegations contained in Paragraph 452.
453. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations of Paragraph 453.
454. Paragraph 454 purports to quote or characterize documents that speak for themselves. SelectQuote denies the allegations contained in Paragraph 454.
455. Defendant denies the allegations of Paragraph 455.
456. Defendant admits that SelectQuote and Aetna entered into lawful commercial agreements relating to Medicare Advantage marketing and brokerage services. Defendant admits it received payment pursuant to those lawful commercial agreements. Defendant denies the remaining allegations in Paragraph 456.
457. Defendant denies the allegations of Paragraph 457.
458. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 458 directed to other parties and on that basis denies the allegations.
459. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 459 directed to other parties and on that basis denies the allegations.

460. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 460 directed to other parties and on that basis denies the allegations.
461. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 461 directed to other parties and on that basis denies the allegations.
462. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 462 directed to other parties and on that basis denies the allegations.
463. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 463 directed to other parties and on that basis denies the allegations.
464. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 464 directed to other parties and on that basis denies the allegations.
465. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 465 directed to other parties and on that basis denies the allegations.
466. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 466 directed to other parties and on that basis denies the allegations.
467. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 467 directed to other parties and on that basis denies the allegations.
468. Defendant denies the allegations of Paragraph 468. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 468 directed to other parties and on that basis denies the allegations.
469. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 469 directed to other parties and on that basis denies the allegations.
470. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 470 directed to other parties and on that basis denies the allegations.
471. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 471 directed to other parties and on that basis denies the allegations.

472. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 472 directed to other parties and on that basis denies the allegations.
473. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 473 directed to other parties and on that basis denies the allegations.
474. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 474 directed to other parties and on that basis denies the allegations.
475. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 475 directed to other parties and on that basis denies the allegations.
476. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 476 directed to other parties and on that basis denies the allegations.
477. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 477 directed to other parties and on that basis denies the allegations.
478. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 478 directed to other parties and on that basis denies the allegations.
479. Paragraph 479 purports to quote or characterize documents that speak for themselves. SelectQuote denies the allegations contained in Paragraph 479.
480. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 480 directed to other parties and on that basis denies the allegations.
481. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 481 directed to other parties and on that basis denies the allegations.
482. Defendant denies the allegations of Paragraph 482 as to SelectQuote. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 482 directed to other parties and on that basis denies the allegations.
483. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 483 directed to other parties and on that basis denies the allegations.

484. Defendant denies the allegations of Paragraph 484. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 484 directed to other parties and on that basis denies the allegations.
485. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 485 directed to other parties and on that basis denies the allegations.
486. Defendant denies the allegations of Paragraph 486 as to SelectQuote and lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 486 directed to other parties and on that basis denies the allegations.
487. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 487 directed to other parties and on that basis denies the allegations.
488. Defendant denies the allegations of Paragraph 488. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 488 directed to other parties and on that basis denies the allegations.
489. Defendant denies the allegations of Paragraph 489. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 489 directed to other parties and on that basis denies the allegations.
490. Defendant denies the allegations in Paragraph 490 as to SelectQuote. Defendant lacks knowledge or information sufficient to form a belief as the remaining allegations in Paragraph 490.
491. Defendant denies the allegations in Paragraph 491, including the allegation that SelectQuote discriminated against disabled Medicare beneficiaries, engaged in any illegal conduct, or otherwise violated any applicable law or regulation. To the extent the Paragraph states legal conclusions, no response is required; to the extent a response is deemed required, Defendant denies the same. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 491 directed to other parties and on that basis denies the allegations.
492. Defendant denies the allegations in Paragraph 492 as to SelectQuote. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 492 directed to other parties and on that basis denies the allegations.
493. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 493 directed to other parties and on that basis denies the allegations.
494. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 494 directed to other parties and on that basis denies the allegations.

495. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 495 directed to other parties and on that basis denies the allegations.
496. Defendant denies the allegations in Paragraph 496 as to SelectQuote. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 496 directed to other parties and on that basis denies the allegations.
497. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 497 directed to other parties and on that basis denies the allegations.
498. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 498 directed to other parties and on that basis denies the allegations.
499. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 499 directed to other parties and on that basis denies the allegations.
500. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 500 directed to other parties and on that basis denies the allegations.
501. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 501 directed to other parties and on that basis denies the allegations.
502. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 502 directed to other parties and on that basis denies the allegations.
503. Defendant denies the allegations of Paragraph 503.
504. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 504 directed to other parties and on that basis denies the allegations.
505. Defendant denies the allegations of Paragraph 505. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 505 directed to other parties and on that basis denies the allegations.
506. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 506 directed to other parties and on that basis denies the allegations.

507. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 507 directed to other parties and on that basis denies the allegations.
508. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 508 directed to other parties and on that basis denies the allegations.
509. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 509 directed to other parties and on that basis denies the allegations.
510. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 510 directed to other parties and on that basis denies the allegations.
511. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 511 directed to other parties and on that basis denies the allegations.
512. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 512 directed to other parties and on that basis denies the allegations.
513. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 513 directed to other parties and on that basis denies the allegations.
514. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 514 directed to other parties and on that basis denies the allegations.
515. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 515 directed to other parties and on that basis denies the allegations.
516. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 516 directed to other parties and on that basis denies the allegations.
517. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 517 directed to other parties and on that basis denies the allegations.
518. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 518 directed to other parties and on that basis denies the allegations.

519. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 519 directed to other parties and on that basis denies the allegations.
520. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 520 directed to other parties and on that basis denies the allegations.
521. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 521 directed to other parties and on that basis denies the allegations.
522. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 522 directed to other parties and on that basis denies the allegations.
523. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 523 directed to other parties and on that basis denies the allegations.
524. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 524 directed to other parties and on that basis denies the allegations.
525. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 525 directed to other parties and on that basis denies the allegations.
526. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 526 directed to other parties and on that basis denies the allegations.
527. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 527 directed to other parties and on that basis denies the allegations.
528. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 528 directed to other parties and on that basis denies the allegations.
529. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 529 directed to other parties and on that basis denies the allegations.
530. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 530 directed to other parties and on that basis denies the allegations.

531. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 531 directed to other parties and on that basis denies the allegations.
532. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 532 directed to other parties and on that basis denies the allegations.
533. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 533 directed to other parties and on that basis denies the allegations.
534. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 534 directed to other parties and on that basis denies the allegations.
535. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 535 directed to other parties and on that basis denies the allegations.
536. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 536 directed to other parties and on that basis denies the allegations.
537. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 537 directed to other parties and on that basis denies the allegations.
538. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 538 directed to other parties and on that basis denies the allegations.
539. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 539 directed to other parties and on that basis denies the allegations.
540. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 540 directed to other parties and on that basis denies the allegations.
541. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 541 directed to other parties and on that basis denies the allegations.
542. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 542 directed to other parties and on that basis denies the allegations.

543. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 543 directed to other parties and on that basis denies the allegations.
544. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 544 directed to other parties and on that basis denies the allegations.
545. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 545 directed to other parties and on that basis denies the allegations.
546. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 546 directed to other parties and on that basis denies the allegations.
547. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 547 directed to other parties and on that basis denies the allegations.
548. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 548 directed to other parties and on that basis denies the allegations.
549. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 549 directed to other parties and on that basis denies the allegations.
550. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 550 directed to other parties and on that basis denies the allegations.
551. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 551 directed to other parties and on that basis denies the allegations.
552. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 552 directed to other parties and on that basis denies the allegations.
553. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 553 directed to other parties and on that basis denies the allegations.
554. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 554 directed to other parties and on that basis denies the allegations.

555. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 555 directed to other parties and on that basis denies the allegations.
556. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 556 directed to other parties and on that basis denies the allegations.
557. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 557 directed to other parties and on that basis denies the allegations.
558. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 558 directed to other parties and on that basis denies the allegations.
559. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 559 directed to other parties and on that basis denies the allegations.
560. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 560 directed to other parties and on that basis denies the allegations.
561. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 561 directed to other parties and on that basis denies the allegations.
562. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 562 directed to other parties and on that basis denies the allegations.
563. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 563 directed to other parties and on that basis denies the allegations.
564. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 564 directed to other parties and on that basis denies the allegations.
565. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 565 directed to other parties and on that basis denies the allegations.
566. Defendant denies the allegations of Paragraph 566. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 566 directed to other parties and on that basis denies the allegations.

567. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 567 directed to other parties and on that basis denies the allegations.
568. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 568 directed to other parties and on that basis denies the allegations.
569. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 569 directed to other parties and on that basis denies the allegations.
570. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 570 directed to other parties and on that basis denies the allegations.
571. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 571 directed to other parties and on that basis denies the allegations.
572. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 572 directed to other parties and on that basis denies the allegations.
573. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 573 directed to other parties and on that basis denies the allegations.
574. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 574 directed to other parties and on that basis denies the allegations.
575. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 575 directed to other parties and on that basis denies the allegations.
576. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 576 directed to other parties and on that basis denies the allegations.
577. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 577 directed to other parties and on that basis denies the allegations.
578. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 578 directed to other parties and on that basis denies the allegations.

579. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 579 directed to other parties and on that basis denies the allegations.
580. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 580 directed to other parties and on that basis denies the allegations.
581. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 581 directed to other parties and on that basis denies the allegations.
582. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 582 directed to other parties and on that basis denies the allegations.
583. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 583 directed to other parties and on that basis denies the allegations.
584. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 584 directed to other parties and on that basis denies the allegations.
585. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 585 directed to other parties and on that basis denies the allegations.
586. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 586 directed to other parties and on that basis denies the allegations.
587. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 587 directed to other parties and on that basis denies the allegations.
588. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 588 directed to other parties and on that basis denies the allegations.
589. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 589 directed to other parties and on that basis denies the allegations.
590. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 590 directed to other parties and on that basis denies the allegations.

591. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 591 directed to other parties and on that basis denies the allegations.
592. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 592 directed to other parties and on that basis denies the allegations.
593. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 593 directed to other parties and on that basis denies the allegations.
594. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 594 directed to other parties and on that basis denies the allegations.
595. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 595 directed to other parties and on that basis denies the allegations.
596. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 596 directed to other parties and on that basis denies the allegations.
597. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 597 directed to other parties and on that basis denies the allegations.
598. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 598 directed to other parties and on that basis denies the allegations.
599. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 599 directed to other parties and on that basis denies the allegations.
600. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 600 directed to other parties and on that basis denies the allegations.
601. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 601 directed to other parties and on that basis denies the allegations.
602. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 602 directed to other parties and on that basis denies the allegations.

603. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 603 directed to other parties and on that basis denies the allegations.
604. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 604 directed to other parties and on that basis denies the allegations.
605. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 605 directed to other parties and on that basis denies the allegations.
606. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 606 directed to other parties and on that basis denies the allegations.
607. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 607 directed to other parties and on that basis denies the allegations.
608. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 608 directed to other parties and on that basis denies the allegations.
609. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 609 directed to other parties and on that basis denies the allegations.
610. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 610 directed to other parties and on that basis denies the allegations.
611. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 611 directed to other parties and on that basis denies the allegations.
612. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 612 directed to other parties and on that basis denies the allegations.
613. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 613 directed to other parties and on that basis denies the allegations.
614. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 614 directed to other parties and on that basis denies the allegations.

615. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 615 directed to other parties and on that basis denies the allegations.
616. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 616 directed to other parties and on that basis denies the allegations.
617. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 617 directed to other parties and on that basis denies the allegations.
618. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 618 directed to other parties and on that basis denies the allegations.
619. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 619 directed to other parties and on that basis denies the allegations.
620. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 620 directed to other parties and on that basis denies the allegations.
621. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 621 directed to other parties and on that basis denies the allegations.
622. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 622 directed to other parties and on that basis denies the allegations.
623. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 623 directed to other parties and on that basis denies the allegations.
624. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 624 directed to other parties and on that basis denies the allegations.
625. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 625 directed to other parties and on that basis denies the allegations.
626. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 626 directed to other parties and on that basis denies the allegations.

627. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 627 directed to other parties and on that basis denies the allegations.
628. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 628 directed to other parties and on that basis denies the allegations.
629. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 629 directed to other parties and on that basis denies the allegations.
630. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 630 directed to other parties and on that basis denies the allegations.
631. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 631 directed to other parties and on that basis denies the allegations.
632. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 632 directed to other parties and on that basis denies the allegations.
633. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 633 directed to other parties and on that basis denies the allegations.
634. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 634 directed to other parties and on that basis denies the allegations.
635. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 635 directed to other parties and on that basis denies the allegations.
636. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 636 directed to other parties and on that basis denies the allegations.
637. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 637 directed to other parties and on that basis denies the allegations.
638. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 638 directed to other parties and on that basis denies the allegations.

639. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 639 directed to other parties and on that basis denies the allegations.
640. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 640 directed to other parties and on that basis denies the allegations.
641. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 641 directed to other parties and on that basis denies the allegations.
642. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 642 directed to other parties and on that basis denies the allegations.
643. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 643 directed to other parties and on that basis denies the allegations.
644. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 644 directed to other parties and on that basis denies the allegations.
645. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 645 directed to other parties and on that basis denies the allegations.
646. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 646 directed to other parties and on that basis denies the allegations.
647. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 647 directed to other parties and on that basis denies the allegations.
648. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 648 directed to other parties and on that basis denies the allegations.
649. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 649 directed to other parties and on that basis denies the allegations.
650. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 650 directed to other parties and on that basis denies the allegations.

651. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 651 directed to other parties and on that basis denies the allegations.
652. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 652 directed to other parties and on that basis denies the allegations.
653. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 653 directed to other parties and on that basis denies the allegations.
654. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 654 directed to other parties and on that basis denies the allegations.
655. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 655 directed to other parties and on that basis denies the allegations.
656. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 656 directed to other parties and on that basis denies the allegations.
657. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 657 directed to other parties and on that basis denies the allegations.
658. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 658 directed to other parties and on that basis denies the allegations.
659. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 659 directed to other parties and on that basis denies the allegations.
660. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 660 directed to other parties and on that basis denies the allegations.
661. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 661 directed to other parties and on that basis denies the allegations.
662. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 662 directed to other parties and on that basis denies the allegations.

663. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 663 directed to other parties and on that basis denies the allegations.
664. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 664 directed to other parties and on that basis denies the allegations.
665. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 665 directed to other parties and on that basis denies the allegations.
666. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 666 directed to other parties and on that basis denies the allegations.
667. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 667 directed to other parties and on that basis denies the allegations.
668. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 668 directed to other parties and on that basis denies the allegations.
669. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 669 directed to other parties and on that basis denies the allegations.
670. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 670 directed to other parties and on that basis denies the allegations.
671. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 671 directed to other parties and on that basis denies the allegations.
672. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 672 directed to other parties and on that basis denies the allegations.
673. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 673 directed to other parties and on that basis denies the allegations.
674. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 674 directed to other parties and on that basis denies the allegations.

675. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 675 directed to other parties and on that basis denies the allegations.
676. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 676 directed to other parties and on that basis denies the allegations.
677. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 677 directed to other parties and on that basis denies the allegations.
678. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 678 directed to other parties and on that basis denies the allegations.
679. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 679 directed to other parties and on that basis denies the allegations.
680. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 680 directed to other parties and on that basis denies the allegations.
681. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 681 directed to other parties and on that basis denies the allegations.
682. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 682 directed to other parties and on that basis denies the allegations.
683. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 683 directed to other parties and on that basis denies the allegations.
684. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 684 directed to other parties and on that basis denies the allegations.
685. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 685 directed to other parties and on that basis denies the allegations.
686. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 686 directed to other parties and on that basis denies the allegations.

687. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 687 directed to other parties and on that basis denies the allegations.
688. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 688 directed to other parties and on that basis denies the allegations.
689. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 689 directed to other parties and on that basis denies the allegations.
690. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 690 directed to other parties and on that basis denies the allegations.
691. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 691 directed to other parties and on that basis denies the allegations.
692. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 692 directed to other parties and on that basis denies the allegations.
693. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 693 directed to other parties and on that basis denies the allegations.
694. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 694 directed to other parties and on that basis denies the allegations.
695. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 695 directed to other parties and on that basis denies the allegations.
696. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 696 directed to other parties and on that basis denies the allegations.
697. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 697 directed to other parties and on that basis denies the allegations.
698. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 698 directed to other parties and on that basis denies the allegations.

699. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 699 directed to other parties and on that basis denies the allegations.
700. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 700 directed to other parties and on that basis denies the allegations.
701. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 701 directed to other parties and on that basis denies the allegations.
702. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 702 directed to other parties and on that basis denies the allegations.
703. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 703 directed to other parties and on that basis denies the allegations.
704. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 704 directed to other parties and on that basis denies the allegations.
705. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 705 directed to other parties and on that basis denies the allegations.
706. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 706 directed to other parties and on that basis denies the allegations.
707. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 707 directed to other parties and on that basis denies the allegations.
708. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 708 directed to other parties and on that basis denies the allegations.
709. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 709 directed to other parties and on that basis denies the allegations.
710. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 710 directed to other parties and on that basis denies the allegations.

711. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 711 directed to other parties and on that basis denies the allegations.
712. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 712 directed to other parties and on that basis denies the allegations.
713. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 713 directed to other parties and on that basis denies the allegations.
714. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 714 directed to other parties and on that basis denies the allegations.
715. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 715 directed to other parties and on that basis denies the allegations.
716. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 716 directed to other parties and on that basis denies the allegations.
717. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 717 directed to other parties and on that basis denies the allegations.
718. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 718 directed to other parties and on that basis denies the allegations.
719. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 719 directed to other parties and on that basis denies the allegations.
720. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 720 directed to other parties and on that basis denies the allegations.
721. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 721 directed to other parties and on that basis denies the allegations.
722. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 722 directed to other parties and on that basis denies the allegations.

723. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 723 directed to other parties and on that basis denies the allegations.
724. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 724 directed to other parties and on that basis denies the allegations.
725. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 725 directed to other parties and on that basis denies the allegations.
726. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 726 directed to other parties and on that basis denies the allegations.
727. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 727 directed to other parties and on that basis denies the allegations.
728. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 728 directed to other parties and on that basis denies the allegations.
729. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 729 directed to other parties and on that basis denies the allegations.
730. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 730 directed to other parties and on that basis denies the allegations.
731. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 731 directed to other parties and on that basis denies the allegations.
732. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 732 directed to other parties and on that basis denies the allegations.
733. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 733 directed to other parties and on that basis denies the allegations.
734. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 734 directed to other parties and on that basis denies the allegations.

735. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 735 directed to other parties and on that basis denies the allegations.
736. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 736 directed to other parties and on that basis denies the allegations.
737. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 737 directed to other parties and on that basis denies the allegations.
738. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 738 directed to other parties and on that basis denies the allegations.
739. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 739 directed to other parties and on that basis denies the allegations.
740. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 740 directed to other parties and on that basis denies the allegations.
741. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 741 directed to other parties and on that basis denies the allegations.
742. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 742 directed to other parties and on that basis denies the allegations.
743. Defendant denies the allegations of Paragraph 743. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 743 directed to other parties and on that basis denies the allegations.
744. Defendant denies the allegations of Paragraph 744. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 744 directed to other parties and on that basis denies the allegations.
745. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 745 directed to other parties and on that basis denies the allegations.
746. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 746 directed to other parties and on that basis denies the allegations.

747. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 747 directed to other parties and on that basis denies the allegations.
748. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 748 directed to other parties and on that basis denies the allegations.
749. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 749 directed to other parties and on that basis denies the allegations.
750. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 750 directed to other parties and on that basis denies the allegations.
751. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 751 directed to other parties and on that basis denies the allegations.
752. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 752.
753. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 753 directed to other parties and on that basis denies the allegations.
754. Defendant denies the allegations of Paragraph 754. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 754 directed to other parties and on that basis denies the allegations.
755. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 755 directed to other parties and on that basis denies the allegations.
756. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 756 directed to other parties and on that basis denies the allegations.
757. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 757 directed to other parties and on that basis denies the allegations.
758. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 758 directed to other parties and on that basis denies the allegations.

759. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 759 directed to other parties and on that basis denies the allegations.
760. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 760 directed to other parties and on that basis denies the allegations.
761. Defendant denies the allegations of Paragraph 761.
762. Defendant denies the allegations of Paragraph 762.
763. Defendant denies the allegations of Paragraph 763.
764. Defendant denies the allegations of Paragraph 764.
765. Defendant denies the allegations of Paragraph 765.
766. Defendant denies the allegations of Paragraph 766.
767. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 767 directed to other parties and on that basis denies the allegations.
768. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 768 directed to other parties and on that basis denies the allegations.
769. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 769 directed to other parties and on that basis denies the allegations.
770. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 770 directed to other parties and on that basis denies the allegations.
771. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 771 directed to other parties and on that basis denies the allegations.
772. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 772 directed to other parties and on that basis denies the allegations.
773. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 773 directed to other parties and on that basis denies the allegations.

774. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 774 directed to other parties and on that basis denies the allegations.
775. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 775 directed to other parties and on that basis denies the allegations.
776. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 776 directed to other parties and on that basis denies the allegations.
777. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 777 directed to other parties and on that basis denies the allegations.
778. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 778 directed to other parties and on that basis denies the allegations.
779. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 779 directed to other parties and on that basis denies the allegations.
780. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 780 directed to other parties and on that basis denies the allegations.
781. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 781 directed to other parties and on that basis denies the allegations.
782. Defendant denies the allegations of Paragraph 782. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 782 directed to other parties and on that basis denies the allegations.
783. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 783 directed to other parties and on that basis denies the allegations.
784. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 784 directed to other parties and on that basis denies the allegations.
785. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 785 directed to other parties and on that basis denies the allegations.

786. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 786 directed to other parties and on that basis denies the allegations.
787. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 787 directed to other parties and on that basis denies the allegations.
788. Defendant denies the allegations of Paragraph 788. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 788 directed to other parties and on that basis denies the allegations.
789. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 789 directed to other parties and on that basis denies the allegations.
790. Defendant denies the allegations of Paragraph 790. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 790 directed to other parties and on that basis denies the allegations.
791. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 791 directed to other parties and on that basis denies the allegations.
792. Defendant denies the allegations of Paragraph 792.
793. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 793 directed to other parties and on that basis denies the allegations.
794. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 794 directed to other parties and on that basis denies the allegations.
795. Defendant denies the allegations of Paragraph 795.
796. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 796 directed to other parties and on that basis denies the allegations.
797. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 797 directed to other parties and on that basis denies the allegations.
798. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 798 directed to other parties and on that basis denies the allegations.

- 799. Defendant denies the allegations of Paragraph 799.
- 800. Defendant denies the allegations of Paragraph 800.
- 801. Defendant denies the allegations of Paragraph 801.
- 802. Defendant denies the allegations of Paragraph 802.
- 803. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 803 directed to other parties and on that basis denies the allegations.
- 804. Defendant denies the allegations of Paragraph 804.
- 805. Defendant denies the allegations of Paragraph 805.
- 806. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 806 directed to other parties and on that basis denies the allegations.
- 807. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 807 directed to other parties and on that basis denies the allegations.
- 808. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 808 directed to other parties and on that basis denies the allegations.
- 809. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 809 directed to other parties and on that basis denies the allegations.
- 810. Defendant denies the allegations of Paragraph 810.
- 811. Defendant denies the allegations of Paragraph 811. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 811 directed to other parties and on that basis denies the allegations.
- 812. Defendant denies the allegations of Paragraph 812.
- 813. Defendant denies the allegations of Paragraph 813.
- 814. Defendant denies the allegations of Paragraph 814.
- 815. Defendant denies the allegations of Paragraph 815.
- 816. Defendant denies the allegations of Paragraph 816.

817. Defendant denies the allegations of Paragraph 817. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 817 directed to other parties and on that basis denies the allegations.
818. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 818 directed to other parties and on that basis denies the allegations.
819. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 819 directed to other parties and on that basis denies the allegations.
820. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 820 directed to other parties and on that basis denies the allegations.
821. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 821 directed to other parties and on that basis denies the allegations.
822. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 822 directed to other parties and on that basis denies the allegations.
823. Defendant denies the allegations of Paragraph 823. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 823 directed to other parties and on that basis denies the allegations.
824. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 824 directed to other parties and on that basis denies the allegations.
825. Defendant denies the allegations of Paragraph 825. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 825 directed to other parties and on that basis denies the allegations.
826. Defendant denies the allegations of Paragraph 826. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 826 directed to other parties and on that basis denies the allegations.
827. Defendant denies the allegations of Paragraph 827. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 827 directed to other parties and on that basis denies the allegations.
828. Defendant denies the allegations of Paragraph 828.
829. Defendant denies the allegations of Paragraph 829.

830. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 830 directed to other parties and on that basis denies the allegations.
831. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 831 directed to other parties and on that basis denies the allegations.
832. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 832 directed to other parties and on that basis denies the allegations.
833. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 833 directed to other parties and on that basis denies the allegations.
834. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 834 directed to other parties and on that basis denies the allegations.
835. Defendant denies the allegations of Paragraph 835. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 835 directed to other parties and on that basis denies the allegations.
836. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 836 directed to other parties and on that basis denies the allegations.
837. Defendant denies the allegations of Paragraph 837.
838. Defendant denies the allegations of Paragraph 838.
839. Defendant denies the allegations of Paragraph 839.
840. Defendant denies the allegations of Paragraph 840.
841. Defendant denies the allegations of Paragraph 841. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 841 directed to other parties and on that basis denies the allegations.
842. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 842 directed to other parties and on that basis denies the allegations.
843. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 843 directed to other parties and on that basis denies the allegations.

844. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 844 directed to other parties and on that basis denies the allegations.
845. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 845 directed to other parties and on that basis denies the allegations.
846. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 846 directed to other parties and on that basis denies the allegations.
847. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 847 directed to other parties and on that basis denies the allegations.
848. Defendant denies the allegations of Paragraph 848. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 848 directed to other parties and on that basis denies the allegations.
849. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 849 directed to other parties and on that basis denies the allegations.
850. Defendant denies the allegations of Paragraph 850. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 850 directed to other parties and on that basis denies the allegations.
851. Defendant denies the allegations of Paragraph 851. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 851 directed to other parties and on that basis denies the allegations.
852. Defendant denies the allegations of Paragraph 852. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 852 directed to other parties and on that basis denies the allegations.
853. Defendant denies the allegations of Paragraph 853.
854. Defendant denies the allegations of Paragraph 854. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 854 directed to other parties and on that basis denies the allegations.
855. Defendant denies the allegations of Paragraph 855.
856. Defendant denies the allegations of Paragraph 856.
857. Defendant denies the allegations of Paragraph 857.

858. Defendant denies the allegations of Paragraph 858.
859. Defendant denies the allegations of Paragraph 859. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 859 directed to other parties and on that basis denies the allegations.
860. Defendant denies the allegations of Paragraph 860. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 860 directed to other parties and on that basis denies the allegations.
861. Defendant denies the allegations of Paragraph 861. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 861 directed to other parties and on that basis denies the allegations.
862. Defendant denies the allegations of Paragraph 862.
863. Count VII has been dismissed by the Court; nevertheless, Defendant denies the allegations contained in Paragraph 863.
864. Count VII has been dismissed by the Court; nevertheless, Defendant denies the allegations contained in Paragraph 864.
865. Count VII has been dismissed by the Court; nevertheless, Defendant denies the allegations contained in Paragraph 865.
866. Count VII has been dismissed by the Court; nevertheless, Defendant denies the allegations contained in Paragraph 866.

AFFIRMATIVE DEFENSES

First Affirmative Defense

Some or all of the Government's claims in its Complaint are barred, either in whole or in part, by the applicable statute of limitations, 31 U.S.C. § 3731(b). Specifically, to the extent the Complaint alleges Anti-Kickback Statute-based violations against Defendant occurring before May 1, 2019, such claims do not relate back to Relator Andrew Shea's ("Relator") November 2, 2021 *qui tam* complaint and are barred by the six-year statute of limitations under 31 U.S.C. § 3731(b)(1). To the extent the Complaint alleges anti-discrimination-based violations against Defendant occurring before May 1, 2019, such claims likewise do not relate back to Relator's complaint and are similarly barred by the six-year statute of limitations under 31 U.S.C. § 3731(b)(1). All of the Government's claims are further barred by the three-year statute of limitations under 31 U.S.C. § 3731(b)(2) because the Government was on sufficient notice of the facts material to its right of action more than three years before filing its Complaint. The Government had actual or constructive notice of the alleged conduct through, among other things, CMS oversight and auditing activities, Defendant's publicly filed registration statement disclosing the nature of its carrier arrangements, and industry-wide awareness of broker marketing payment structures in the Medicare Advantage market.

Second Affirmative Defense

The Government's claims are barred under the False Claims Act because there is no material underlying violation of federal regulatory requirements. Under *Universal Health Services, Inc. v. United States ex rel. Escobar*, 579 U.S. 176 (2016), a misrepresentation is material to a payment decision only if the Government would actually have refused payment had it known of the alleged violation. Here, CMS continued making capitation payments to Medicare Advantage

Organizations over the entire period alleged in the Complaint—from 2016 through 2021— notwithstanding its oversight of broker practices and its awareness, through public filings and industry disclosures, of co-op and performance-based marketing arrangements between insurers and brokers. The Government's years-long course of continued payment in the face of such knowledge demonstrates that the alleged violations were not material to CMS's payment decisions and cannot support FCA liability.

Third Affirmative Defense

The Government's claims are barred, in whole or in part, because Defendant at all times complied with applicable laws and regulations. To the extent payment for Medicare Advantage marketing services provided by Defendant should have been provided in the manner alleged by the Government, the applicable laws and regulations were ambiguous, Defendant's interpretations of those laws and regulations were reasonable and in good faith, and Defendant acted at all times without any improper or illegal purpose or intent.

Fourth Affirmative Defense

The Government's claims are barred, in whole or in part, because Defendant's actions were based on an objectively reasonable interpretation of the relevant statutes, regulations, and guidelines. The relevant statutes, regulations, and guidelines were, at best, vague and ambiguous. *See* 42 C.F.R. § 422.2274; 73 Fed. Reg. at 54,250–51; 2009 CMS Medicare Marketing Guidelines § 10 (Aug. 7, 2009), <https://perma.cc/5WUZ-9SQR>.

Fifth Affirmative Defense

The Government's claims are barred, in whole or in part, because the Government's interpretation of the Anti-Kickback Statute would subject Defendant to liability for conduct that

Congress and CMS expressly authorized, and payments explicitly authorized by both Congress and CMS cannot be kickbacks.

Sixth Affirmative Defense

The Complaint fails to allege facts showing that Defendant acted "knowingly" under the False Claims Act or "knowingly and willfully" under the Anti-Kickback Statute. The Complaint pleads, at most, lawful marketing, co-op, or sponsorship arrangements and mischaracterizations and inferences regarding curated excerpts of select documents, communications, and testimony without providing full context, that do not establish the requisite scienter as to Defendant.

Seventh Affirmative Defense

The Complaint fails to allege facts showing that any claim for payment the Government paid "resulted from" an Anti-Kickback Statute violation or any discriminatory practice, or that any enrollment was invalid or that CMS payments would have been denied absent the alleged conduct. The Complaint's conclusory "resulting from" and "falsely represented compliance" theories fail to connect specific payments to any predicate violation.

Eighth 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 Defendant's constitutional rights, including under the Appointments, Vesting, Take Care, Excessive Fines, and Due Process clauses, or any other constitutional provision. Specifically, to the extent that penalties imposed under the False Claims Act exceed any actual damage incurred by the Government as a result of any claims paid, the False Claims Act violates the Excessive Fines Clause of the Eighth Amendment to the United States Constitution, and therefore is void. Further, imposing Anti-Kickback Statute liability on Defendant for payments that have been expressly authorized by

Congress and CMS would deprive Defendant of the fair notice that due process requires under the Fifth Amendment, and would constitute an unconstitutional application of the AKS to Defendant's conduct.

Ninth Affirmative Defense

The Government's claims are barred, in whole or in part, because Defendant did not present or cause to be presented any false claim, record, or statement to the United States.

Tenth Affirmative Defense

The damages and penalties the Government seeks from Defendant should be offset to the extent that they overlap with the damages and penalties the Government seeks from other Defendants in this case or from Defendants in other cases.

Eleventh Affirmative Defense

Some or all of the Government's purported claims and allegations in the Complaint are barred, in whole or in part, by the doctrines of waiver and ratification to the extent that the Government or its authorized agent reviewed, approved, and audited any claims actually at issue in this case.

Twelfth Affirmative Defense

The Government's claims are barred, in whole or in part, because Defendant's conduct did not cause or proximately cause any false claim or certification, or the alleged loss and/or damages. To the extent any harm occurred (which Defendant denies and states only for purposes of this affirmative defense), it was caused by independent actions of third parties, including beneficiaries' choices, conduct outside the scope of Defendant's control, or other market factors, breaking any causal chain between Defendant's alleged acts and Government payments.

Thirteenth Affirmative Defense

The Government's claims are barred, in whole or in part, because the alleged conduct of employees cannot be imputed to Defendant under the doctrine of respondeat superior.

Defendant reserves the right to assert any additional and further defenses that may be revealed by information obtained during the course of investigation and discovery and consistent with the Federal Rules of Civil Procedure.

Dated: May 22, 2026

Respectfully submitted,

/s/Clay Lee

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served upon all counsel of record via ECF on May 22, 2026.

/s/ Clay Lee _____

Clay Lee