

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA
ex rel. ANDREW SHEA,

Plaintiff,

v.

eHEALTH, INC., et al.,

Defendants.

Civil Action No. 21-cv-11777-DJC
Hon. Denise J. Casper

**JOINT STATUS REPORT REGARDING STAY OF PROCEEDINGS
CONCERNING RELATOR’S *QUI TAM* CLAIMS**

Pursuant to the Court’s August 15, 2025 order (ECF No. 111), Defendants eHealth Inc. and eHealthInsurance Services, Inc. (collectively, “eHealth”), GoHealth, Inc. (“GoHealth”), SelectQuote, Inc. (“SelectQuote”), Humana Inc. (“Humana”), and WellCare Health Plans, Inc. (“WellCare”) submit jointly with *qui tam* Relator Andrew Shea (“Relator”) the following status report regarding the stay of proceedings concerning Relator’s *qui tam* claims.

1. On July 30, 2025, Defendants filed an unopposed motion to stay all proceedings concerning Relator’s separate Amended *Qui Tam* Complaint (ECF No. 40) pursuing non-intervened claims until the later of (a) a full resolution of Defendants’ now pending motion to dismiss the Government’s Complaint in Partial Intervention, or (b) the end of the Government’s ongoing investigation. ECF No. 93. The Defendants moved for the stay, which was unopposed by Relator, on the grounds that a stay would conserve resources, help prevent potentially inconsistent rulings, allow the government to finish its investigation, avoid—or, at least, postpone—the need for this

Court to decide constitutional and statutory issues regarding Relator's purported ability to proceed on non-intervened claims, and cause no prejudice to the Relator.

2. On August 15, 2025, the Court granted Defendants' motion, staying all proceedings concerning Relator's *qui tam* claims until January 21, 2026. The Court ordered that counsel file a status memo regarding the stay by that date. ECF No. 111.

3. Also on August 15, 2025, the Court entered a briefing schedule for Defendants' eHealth, GoHealth, SelectQuote, Humana, Aetna Inc., Aetna Life Insurance Company, and Elevance Health Inc. Motion to Dismiss the Government's Complaint in Partial Intervention and set a hearing on the Motion to Dismiss for January 21, 2026. ECF Nos. 109, 110.¹

4. The Motion to Dismiss is now fully briefed and the parties are scheduled to appear before this Court on January 21, 2026 for the hearing on that motion.

5. To the undersigned's knowledge, there have been no changed circumstances that would militate in favor of lifting of the stay. Accordingly, Defendants and Relator agree that the most efficient use of resources would be to continue to stay proceedings as to Relator's *qui tam* claims until the later of (a) a full resolution of Defendants' pending Motion to Dismiss, or (b) the Government formally intervenes or declines as to the WellCare-related allegations.

¹ WellCare is not a named defendant in the Government's Complaint in Partial Intervention. ECF No. 41. As such, WellCare is not a party to the pending Motion to Dismiss.

Dated: January 20, 2026

Respectfully submitted,

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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 January 20, 2026.

/s/ Laura McLane

Laura McLane

Dated: January 20, 2026