

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

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UNITED STATES OF AMERICA *ex rel.*  
ANDREW SHEA,

*Plaintiff,*

v.

eHEALTH, Inc., *et al.*,

*Defendants.*

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

**JOINT MOTION TO MODIFY DISCOVERY ORDER**

Defendants eHealth Inc. and eHealthInsurance Services, Inc. (together, “eHealth”), and Relator Andrew Shea (“Relator”), jointly move to modify the discovery order (ECF No. 173)—to the extent modification is needed—to permit eHealth to propound up to twelve (12) requests for production on Relator and to permit Relator to propound up to six (6) requests for production on eHealth, without those requests counting against any limits presently set in the discovery order.<sup>1</sup> eHealth and Relator further agree that neither will propound interrogatories or requests for admissions upon the other. The remaining Defendants assent and the Government does not oppose this motion. This requested modification would not impact any deadlines currently in place.

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<sup>1</sup> After the Court entered the discovery order, eHealth served a subpoena for documents on Relator under Federal Rule of Civil Procedure 45. Relator objected that discovery should be served under Federal Rule of Civil Procedure 34. Following conferral, eHealth and Relator agreed to submit this joint motion to avoid unnecessary litigation regarding their disagreement. In submitting this joint motion, eHealth and Relator reserve all rights.

Dated: August 20, 2026

Respectfully submitted,

/s/ Zachary R. Hafer

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**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1**

Pursuant to Local Rule 7.1(a)(2), I hereby certify that undersigned counsel conferred in good faith with counsel for Relator, the non-eHealth Defendants, and the Government regarding the foregoing motion.

/s/ Zachary R. Hafer

Zachary R. Hafer

Dated: August 20, 2026

**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 August 20, 2026.

/s/ Zachary R. Hafer

Zachary R. Hafer

Dated: August 20, 2026