

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

CHRISTY BURBAGE, Individually and
on Behalf of All Others Similarly Situated,

Plaintiff,

v.

U.S. ANESTHESIA PARTNERS, INC.,
U.S. ANESTHESIA PARTNERS OF
TEXAS, P.A., and U.S. ANESTHESIA
PARTNERS HOLDINGS, INC., WELSH,
CARSON, ANDERSON & STOWE XI,
L.P., WCAS ASSOCIATES XI, LLC,
WELSH, CARSON, ANDERSON &
STOWE XII, L.P., WCAS ASSOCIATES
XII, LLC, WCAS MANAGEMENT
CORPORATION, WCAS
MANAGEMENT, L.P., and WCAS
MANAGEMENT, LLC,

Defendants.

Case No. 4:25-cv-116

PLAINTIFF'S UNOPPOSED MOTION TO FILE UNDER TEMPORARY SEAL

Pursuant to the Court's Procedures and Practices Section B.5(d) and the May 28, 2025 Protective Order (ECF No. 85) and October 29, 2025 Supplemental Protective Order (ECF No. 101) the Court issued in this case, Plaintiff Christy Burbage respectfully requests that the Court maintain under seal Plaintiff's unredacted First Amended Complaint. In support of this motion, Plaintiff states as follows:

1. On May 28, 2025, the Court entered a Protective Order that governs the handling of pleadings and the information contained therein. On October 29, 2025, the Court entered a Supplemental Protective Order. These Protective Orders prohibit public disclosure of documents designated as “Confidential Material” or “Highly Confidential Material.”

2. Plaintiff’s Amended Complaint contains information that Defendants have designated as “Confidential Material” and/or “Highly Confidential Material.” Plaintiff is accordingly required by the Protective Order to file this motion to temporarily seal that information.

For the foregoing reasons, Plaintiff requests the Court accept under seal an unredacted version of Plaintiff’s First Amended Complaint.

Dated: February 9, 2026

Respectfully submitted,

/s/ Brice A. Wilkinson

Barrett H. Reasoner
Federal ID No. 14922
State Bar No. 16641980
Brice A. Wilkinson
Federal ID No. 1277347
State Bar No. 24075281
GIBBS & BRUNS LLP
1100 Louisiana, Suite 5300
Houston, TX 77002
Phone: (713) 751-5244
breasoner@gibbsbruns.com
bwilkinson@gibbsbruns.com

Kellie Lerner
Harrison McAvoy
SHINDER CANTOR LERNER LLP

14 Penn Plaza, Fl. 19
New York, NY 10122
Phone: (646) 960-8608
kellie@scl-llp.com
harrison@scl-llp.com

Keagan Potts
SHINDER CANTOR LERNER LLP
600 14th St NW, 5th Fl.
Washington DC 20005
Phone: (646) 960-8627
kpotts@scl-llp.com

Kimberly A. Justice
FREED KANNER LONDON & MILLEN LLC
923 Fayette Street
Conshohocken, PA 19428
Phone: (224) 632-4500
kjustice@fklmlaw.com

Robert J. Wozniak
FREED KANNER LONDON & MILLEN LLC
100 Tri-State International Drive, Suite 128
Lincolnshire, IL 60069
Phone: (224) 632-4500
rwozniak@fklmlaw.com

Justin S. Nematzadeh
NEMATZADEH PLLC
101 Avenue of the Americas, Suite 909
New York, NY 10013
Phone: (646) 799-6729
jsn@nematlawyers.com

Counsel for Plaintiff and the Proposed Class

CERTIFICATE OF CONFERENCE

I hereby certify that on February 9, 2026, counsel for Plaintiff conferred via email with counsel for Defendants (Kyle M. Wood) and counsel stated that Defendants are unopposed to the relief requested in this Motion.

/s/ Brice A. Wilkinson
Brice A. Wilkinson

CERTIFICATE OF SERVICE

I hereby certify that on February 9, 2026, the foregoing document was filed with the Court and served on all counsel of record through the Court's electronic filing system.

/s/ Brice A. Wilkinson
Brice A. Wilkinson