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Attorneys for Defendants

Sound Physicians Emergency Medicine of

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Physicians Anesthesiology of California, P.C.

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

Anthem Blue Cross Life and Health
Insurance Company, a California
corporation; Blue Cross of California dba
Anthem Blue Cross, a California
corporation

Plaintiffs,

v.

HaloMD, LLC; Alla LaRoque; Scott
LaRoque; MPOWERHealth Practice
Management, LLC; Bruin
Neurophysiology, P.C.; iNeurology, P.C.;
N Express, P.C.; North American
Neurological Associates, P.C.; Sound
Physicians Emergency Medicine of
Southern California, P.C.; and Sound
Physicians Anesthesiology of California,
P.C.,

Defendants.

CASE NO. 8:25-cv-01467-KES

**NOTICE OF MOTION AND
MOTION TO STRIKE PURSUANT
TO CAL. CIV. PROC. CODE
§ 425.16**

**Filed concurrently with
Memorandum of Points and
Authorities; Declaration of Matthew
L. Knowles Regarding Meet and
Confer Efforts; [Proposed] Order**

DATE: March 10, 2026

TIME: 10:00 a.m.

COURTROOM: 6D

JUDGE: Karen E. Scott

**AMENDED COMPLAINT FILED:
10/17/2025**

NOTICE OF MOTION AND MOTION

TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on March 10, 2026 at 10:00 a.m. PDT, or as soon thereafter as the matter may be heard, in the courtroom of the Honorable Karen E. Scott, located at the Ronald Reagan Federal Building and United States Courthouse, 411 West 4th Street, Santa Ana California 92701, Defendants Sound Physicians Emergency Medicine of Southern California, P.C. and Sound Physicians Anesthesiology of California, P.C. (“Sound Physicians”) will, and hereby do, move the Court for an Order granting this special motion to strike pursuant to California’s anti-strategic lawsuit against public participation (“anti-SLAPP”) statute, Cal. Civ. Proc. Code § 425.16 (the “anti-SLAPP motion”). Defendant Sound Physicians moves to strike Plaintiffs Anthem Blue Cross Life and Health Insurance Company’s and Blue Cross of California dba Anthem Blue Cross’s (“Anthem”) state-law claims in its Amended Complaint: Count VI, fraudulent misrepresentation, Count VIII, negligent misrepresentation, and Count X, business acts or practices in violation of Cal. Bus. & Prof. Code § 17200 *et seq.* In addition, Sound Physicians moves this Court for an award of attorney fees and costs in an amount to be determined.

This anti-SLAPP motion is filed to enforce the substantive rights protected under California’s anti-SLAPP statute, Cal. Civ. Proc. Code § 425.16 on the basis that:

(i) Anthem’s state-law claims arise from acts in furtherance of Sound Physicians’

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1 constitutional right of petition, and (ii) Anthem cannot establish that there is a
2 probability that it will prevail on its state-law claims.
3

4 This Motion is based on this Notice of Motion and Motion, the accompanying
5 Memorandum of Points and Authorities, all other pleadings and papers filed or to be
6 filed in this action, and any argument that may be presented to the Court at the hearing
7 on this Motion.
8

9 This Motion is made following a meet-and-confer conference of counsel
10 pursuant to Local Rule 7-3, as detailed in Matthew L. Knowles’s declaration, filed
11 concurrently. An agreement could not be reached to avoid the need for this Motion.
12

13 Dated: December 12, 2025

MCDERMOTT WILL & SCHULTE LLP

By: /s/ Tala Jayadevan
Tala Jayadevan

Laura McLane (*appearing pro hac vice*)
Matthew L. Knowles (*appearing pro hac vice*)
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