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18 *Attorneys for Plaintiffs*

19 UNITED STATES DISTRICT COURT
20 CENTRAL DISTRICT OF CALIFORNIA
21 SOUTHERN DIVISION

22 ANTHEM BLUE CROSS LIFE AND
HEALTH INSURANCE COMPANY, a
23 California corporation, BLUE CROSS
OF CALIFORNIA DBA ANTHEM
24 BLUE CROSS, a California corporation,

25 Plaintiffs,

26 v.

27 HALOMD, LLC; ALLA LAROQUE;
SCOTT LAROQUE;
28 MPOWERHEALTH PRACTICE
MANAGEMENT, LLC; BRUIN

DCACTIVE-86370965.1

Case No. 8:25-cv-01467-KES

Hon. Karen E. Scott

**NOTICE OF ERRATA TO
CORRECT PLAINTIFFS'
OPPOSITIONS TO MOTION TO
STRIKE AND MOTION TO
DISMISS (ECF NOS. 92 & 93)**

1 NEUROPHYSIOLOGY, P.C.;
2 iNEUROLOGY, PC; N EXPRESS, PC;
3 NORTH AMERICAN
4 NEUROLOGICAL ASSOCIATES, PC;
5 SOUND PHYSICIANS EMERGENCY
6 MEDICINE OF SOUTHERN
7 CALIFORNIA, P.C.; and SOUND
8 PHYSICIANS ANESTHESIOLOGY
9 OF CALIFORNIA, P.C.,

Defendants.

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1 Plaintiffs Anthem Blue Cross Life and Health Insurance Company and Blue
 2 Cross of California d/b/a Anthem Blue Cross (“Anthem”), hereby submit this Notice
 3 of Errata to correct two case law citations in Anthem’s Memorandum of Law in
 4 Opposition to Defendants’ Special Motions to Strike [ECF No. 92] (“Opposition to
 5 Motions to Strike”) and Memorandum of Law in Opposition to Defendants’ Motions
 6 to Dismiss [ECF No. 93] (“Opposition to Motions to Dismiss”) (collectively, the
 7 “Oppositions”), which were submitted on January 30, 2026.

8 In the Opposition to Motions to Strike, Anthem makes the following
 9 correction to add a citation to the majority opinion, which includes the same
 10 relevant language as the dissenting opinion:

Location	Original Citation	Corrected Citation
Page 17, Lines 8-9	“ <i>Murray v. Alaska Airlines, Inc.</i> , 50 Cal. 4th 860, 881 (2010) (cleaned up)”	“ <i>Murray v. Alaska Airlines, Inc.</i> , 50 Cal. 4th 860, 867–68 (2010) (Baxter, J., majority decision) (cleaned up); <i>see also id.</i> at 881 (quoting identical language) (Werdegar, J., dissenting).”

17 This corrected citation addresses certain Defendants’ concerns that Anthem quoted
 18 a dissenting opinion. *See* Reply in Support of Sound Physicians’ Special Motion to
 19 Strike [ECF No. 118] at 1, 14-15.

20 In the Opposition to Motions to Dismiss, Anthem makes the following
 21 correction to replace a short citation with a full citation:

Location	Original Citation	Corrected Citation
Page 36, Line 15	“ <i>Id.</i> at *10 (internal quotation marks omitted)”	“ <i>Viriyapanthu v. California</i> , No. SACV172266JVSDFMX, 2018 WL 6265091, at *10 (C.D. Cal. June 7, 2018) (internal quotation marks omitted)”

1 This corrected citation addresses certain Defendants’ concern that they could not
2 find the source of two quotations appearing in Anthem’s brief. *See Reply in*
3 *Support of Sound Physicians’ Motion to Dismiss* [ECF No. 117] at 22.

4 No substantive changes have been made to Anthem’s Oppositions and no
5 new evidence has been added or cited to in Anthem’s Oppositions. Attached hereto
6 as Exhibits 1 and 2 are amended L.R. 11-6.1 Certificates of Compliance confirming
7 that, with these corrections, Anthem’s Opposition to Motions to Strike and
8 Opposition to Motions to Dismiss still comply with the word limits set by the
9 Court.

10
11 Dated: February 27, 2026

CROWELL & MORING LLP

12
13 By: /s/ Joshua M. Robbins

14 Amir Shlesinger
15 Jennie W. VonCannon
16 Joshua M. Robbins
17 Jason T. Mayer (*admitted pro hac vice*)
18 Martin J. Bishop (*admitted pro hac vice*)
19 Alexandra M. Lucas (*admitted pro hac vice*)
20 Jed Wulfekotte (*admitted pro hac vice*)

21 *Attorneys for Plaintiffs*
22 *Anthem Blue Cross Life and Health*
23 *Insurance Company and Blue Cross of*
24 *California d/b/a Anthem Blue Cross*

Exhibit 1

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AMENDED L.R. 11-6.1 CERTIFICATE OF COMPLIANCE

Pursuant to Section 28 of the Procedures of the Honorable Karen E. Scott, the undersigned, counsel of record for ANTHEM BLUE CROSS LIFE AND HEALTH INSURANCE COMPANY and BLUE CROSS OF CALIFORNIA D/B/A ANTHEM BLUE CROSS, certifies that PLAINTIFF ANTHEM’S MEMORANDUM OF LAW IN OPPOSITION TO DEFENDANTS’ SPECIAL MOTIONS TO STRIKE, including the correction in the February 27, 2026 Notice of Errata but excluding the caption, the signature block, tables of contents and authorities, and any supporting documents, contains 10,745 words, which:

___complies with the word limit of L.R. 11-6.1.

[X] complies with the word limit set by court order dated January 27, 2026, ECF No. 90.

Dated: February 27, 2026

CROWELL & MORING LLP

By: /s/ Joshua M. Robbins
Joshua M. Robbins

Counsel for Plaintiffs Anthem Blue Cross Life and Health Insurance Company and Blue Cross of California d/b/a Anthem Blue Cross

Exhibit 2

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AMENDED L.R. 11-6.1 CERTIFICATE OF COMPLIANCE

Pursuant to Section 28 of the Procedures of the Honorable Karen E. Scott, the undersigned, counsel of record for ANTHEM BLUE CROSS LIFE AND HEALTH INSURANCE COMPANY and BLUE CROSS OF CALIFORNIA D/B/A ANTHEM BLUE CROSS, certifies that PLAINTIFFS’ MEMORANDUM OF LAW IN OPPOSITION TO DEFENDANTS’ MOTIONS TO DISMISS, including the correction in the February 27, 2026 Notice of Errata but excluding the caption, the signature block, tables of contents and authorities, and any supporting documents, contains 22,740 words, which:

___complies with the word limit of L.R. 11-6.1.

[X] complies with the word limit set by court order dated January 27, 2026, ECF No. 90.

Dated: February 27, 2026

CROWELL & MORING LLP

By: /s/ Joshua M. Robbins
Joshua M. Robbins

Counsel for Plaintiffs Anthem Blue Cross Life and Health Insurance Company and Blue Cross of California d/b/a Anthem Blue Cross