

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA

UNITEDHEALTHCARE OF PENNSYLVANIA,
INC. d/b/a UNITEDHEALTHCARE
COMMUNITY PLAN,

Plaintiff,

vs.

NORTHSTAR ANESTHESIA OF
PENNSYLVANIA, LLC,

Defendant.

Case No. 25-cv-07187-MAK

**PLAINTIFF UNITED HEALTHCARE OF PENNSYLVANIA’S RESPONSE TO
DEFENDANT’S NOTICE OF SUPPLEMENTAL AUTHORITY**

Plaintiff United Healthcare of Pennsylvania, Inc. d/b/a United HealthCare Community Plan (“United”), by and through undersigned counsel, respectfully responds to *Defendant’s Notice of Supplemental Authority*, [ECF No. 39], regarding the order in *Anthem Blue Cross Life and Health Insurance Company, et al. v. HaloMD LLC, et al.*, No. 8:25-cv-01467-KES (C.D. Cal. Apr. 9, 2026) [ECF No. 135] (“Anthem Order”). The Anthem Order is factually and legally distinguishable, and NorthStar’s characterization of the holdings in that matter is misleading.

In the *Anthem* case, the plaintiffs brought federal RICO and ERISA claims against *ten* defendants and sought to “vacate [the] arbitrator’s award[s] under the FAA.” Anthem Order at 12. The court’s ruling in *Anthem* is anchored in its analysis as to whether Anthem’s allegations met “the substantive requirements for claiming vacatur under 9 U.S.C. § 10(A)(1) or (4).” Anthem Order at 17. To the extent the *Anthem* court addressed fraud at all, it analyzed a narrow set of issues as they applied in the context of the FAA and only insofar as necessary to decide on vacatur.

Here, United has not brought RICO claims, United has not brought ERISA claims, and United does not seek vacatur of the lone IDRE determination at issue in this case.

Moreover, Anthem alleged harm resulting from a scheme to “manipulate the IDR process” concerning “at least 1,500 IDR proceedings[.]” Anthem Order at 9. However, the court found that Anthem’s complaint did “not [even] list all the IDR determinations they seek to vacate.” Anthem Order at 14. Here, United has pleaded with specificity its fraud claim concerning a single facially ineligible claim that was never subject to the NSA and never eligible for IDR.

Finally, the Magistrate Judge’s Order in the *Anthem* case arose in the Central District of California under Ninth Circuit law, which this Court is not bound to follow.

United respectfully submits that the case cited in Defendant’s Notice is irrelevant here and does not support their Motion to Dismiss.

Dated: April 17, 2026

/s/ Jordan Hughes

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CERTIFICATE OF SERVICE

I hereby certify that on April 17, 2026, the foregoing was electronically filed with the Clerk of the United States District Court for the Eastern District of Pennsylvania using the CM/ECF system, which sent notifications of such filing to all registered CM/ECF users.

DATED: April 17, 2026

/s/ Jordan Hughes
Jordan Hughes
Attorney for Plaintiff