

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
AT GREENEVILLE**

BALLAD HEALTH, MOUNTAIN STATES)	
HEALTH ALLIANCE, WELLMONT)	
HEALTH SYSTEM, TAKOMA REGIONAL)	
HOSPITAL, INC., WELLMONT HAWKINS)	
COUNTY MEMORIAL HOSPITAL, INC.,)	
DICKENSON COMMUNITY HOSPITAL,)	
INC., JOHNSTON MEMORIAL HOSPITAL,)	Civ. Action No. 2:25-cv-00176 (CLC)(CRW)
INC, SMYTH COUNTY COMMUNITY)	
HOSPITAL,)	
)	
Plaintiffs,)	
)	
v.)	
)	
UNITEDHEALTH GROUP, INC., and)	
UNITED HEALTHCARE INSURANCE)	
COMPANY,)	
)	
Defendants.)	

JOINT STIPULATION

Plaintiffs Ballad Health, Mountain States Health Alliance, Wellmont Health System, Takoma Regional Hospital, Inc., Wellmont Hawkins County Memorial Hospital, Inc., Dickenson Community Hospital, Inc., Johnston Memorial Hospital, Inc., and Smyth County Community Hospital (altogether, “Plaintiffs” or “Ballad Health”) and Defendants UnitedHealth Group, Incorporated (“UHG”) and United Healthcare Insurance Company (“UHC” and together with UHG, “Defendants” or “United”), through their counsel, hereby stipulate and agree as follows:

1. Any and all communications between Ballad’s (or its affiliates’) personnel or agents and United’s (or its affiliates’) personnel or agents, which occurred or occur during the period of time beginning on the date of the lawsuit’s filing (October 21, 2025) and ending upon

either party providing 14 days written notice, that relate to any and all disputes relating to the payment of medical claims will not be used in this lawsuit, any arbitration, or any other litigation.

Dated: March 27, 2026

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CALDWELL & BERKOWITZ, PC**

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