

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
GREENEVILLE DIVISION**

BALLAD HEALTH, et al.,

Plaintiffs,

vs.

UNITEDHEALTH GROUP
INCORPORATED, et al.,

Defendants.

No. 2:25-CV-176-DCLC-CRW

**MOTION TO COMPEL ARBITRATION,
OR ALTERNATIVELY, TO DISMISS THE COMPLAINT
FOR LACK OF PERSONAL JURISDICTION AND FAILURE TO STATE A CLAIM**

In accordance with the Federal Arbitration Act, 9 U.S.C. § 1 *et seq.*, Defendants UnitedHealthcare Insurance Company (UHIC) and UnitedHealth Group Incorporated (UHG) move to compel arbitration. Alternatively, in accordance with Federal Rules of Civil Procedure 12(b)(2) and 12(b)(6), Defendants move to dismiss the Complaint for lack of personal jurisdiction and failure to state a claim. Defendants are filing their brief in support of the motion under separate cover, with redactions to protect confidential information quoted throughout that brief that Defendants are moving to file under seal.

Respectfully submitted this 4th day of December, 2025.

s/ John E. Winters

John E. Winters (BPR # 016345)

KRAMER RAYSON, LLP

PO Box 629

Knoxville, TN 37901-0629

(865) 524-5134

jwinters@kramer-rayson.com

Brian D. Boone (pro hac vice pending)

ALSTON & BIRD LLP

Vantage South End

1120 South Tryon Street, Suite 300

Charlotte, NC 28203

(704) 444-1000

brian.boone@alston.com

Esmat Hanano (pro hac vice pending)

ALSTON & BIRD LLP

One Atlantic Center

1201 W Peachtree St NW, Suite 4900

Atlanta, GA 30309

(404) 881-7000

esmat.hanano@alston.com

*Counsel for Defendants UnitedHealth
Group Incorporated & UnitedHealthcare
Insurance Company*

CERTIFICATE OF CONFERRAL

The parties have conferred and disagree as to whether the deficiencies in the complaint could be cured by amendment.

s/ John E. Winters
John E. Winters

CERTIFICATE OF SERVICE

On this 4th day of December, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which serves a true and correct copy of the same to all attorneys.

s/ John E. Winters
John E. Winters