

**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

UNOPPOSED MOTION FOR LEAVE TO FILE DOCUMENT UNDER SEAL

In accordance with Local Rule 26.2 and this Court’s sealing order (ECF No. 8), Defendants UnitedHealthcare Insurance Company (“UHIC”) and UnitedHealth Group Incorporated (“UHG”) (collectively, “United”), respectfully move this Court for leave to file under seal their Reply Supporting the Motion to Compel Arbitration, or Alternatively to Dismiss the Complaint for Lack of Personal Jurisdiction and Failure to State a Claim. United requests this relief because the Reply quotes confidential agreements between UHIC and Ballad Health and its affiliates, which include terms that preclude or limit their content’s public disclosure. Plaintiffs do not oppose the motion. The Court previously granted motions to seal exhibits to the complaint, United’s initial brief, and Ballad Health’s response brief for the same reason. *See* ECF Nos. 10, 27, 33.

United has attached the redacted Reply. And United will file under seal, using the *Proposed Sealed Document* event in CM/ECF, their unredacted Reply Supporting the Motion to Compel Arbitration, or Alternatively to Dismiss the Complaint for Lack of Personal Jurisdiction and Failure to State a Claim.

For those reasons, United requests the Court grant this unopposed motion to seal.

Dated: January 16, 2026

Respectfully submitted,

s/ John E. Winters

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Group Incorporated & UnitedHealthcare
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CERTIFICATE OF SERVICE

On this 16th day of January, 2026, 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