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January 28, 2026

APPLICATION GRANTED  
SO ORDERED

VIA ECF

1/29/26 John G. Koeltl, U.S.D.J.

The Honorable John G. Koeltl  
United States District Court for the Southern District of New York  
500 Pearl St # 1030  
New York, NY 10007

Re: *The American Psychiatric Association et al v. EmblemHealth, Inc., et al*, No. 1:25-cv-107883-JGK - Letter Motion for Extension of Time

Dear Judge Koeltl:

We represent Defendants EmblemHealth, Inc., EmblemHealth Plan, Inc. (collectively, "Emblem") in the above-referenced action. We respectfully submit this letter requesting a brief extension of time to answer or otherwise respond to the complaint.

The current deadline for Emblem's response is January 29, 2026. Emblem respectfully requests that the Court extend its time to seek a pre-motion conference in connection with a request to file a motion to dismiss, to February 27, 2026 (a 29-day extension), or to file an Answer to the Complaint, to March 12 (a 42-day extension).

Good cause exists. The complaint asserts multiple statutory and common-law causes of action on behalf of organizational plaintiffs and a putative class of plan members, and it incorporates a substantial factual record regarding provider directories, delegation agreements, and regulatory frameworks.

Plaintiffs have consented to this request, provided that if the Court grants Emblem leave to file a motion to dismiss (whether at a conference or otherwise), Emblem will file such motion within five business days of the Court's order. Emblem has agreed to this condition.

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Respectfully submitted,  
Amanda H. Freyre