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September 16, 2021

The Honorable Kenneth M. Karas
United States District Court
300 Quarropas Street
White Plains, New York 10601-4150

Re: United States ex. rel. Cutler v. Cigna Corp. et al., No. 17-cv-5715 (KMK)

Dear Judge Karas,

In order to narrow the issues for the Court and in light of the Sixth Circuit ruling in *Canaday v. Anthem Companies*, the Relator will not dispute that the Tennessee courts recognize nationwide service of process for claims filed under the False Claims Act. At the upcoming hearing, the focus of Relator's argument will be that Defendants have failed to prove by clear and convincing evidence that a venue transfer would be for the convenience of the parties and witnesses, and in the interest of justice.

Respectfully Submitted,

/s/ Robert A. Cutler

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