

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

UNITED STATES OF AMERICA
ex rel. ROBERT A. CUTLER,

Plaintiff,

v.

THE CIGNA GROUP *et al.*,

Defendants.

Civil Action No. 3:21-cv-00748

District Judge Eli J. Richardson

Magistrate Judge Jeffrey S. Frensley

JURY DEMAND

JOINT REPORT ON THE STATUS OF ESI DISCOVERY

Pursuant to this Court's Initial Case Management Order (Doc. No. 229), as modified (Doc. No. 241), the United States of America, Relator, and Defendants submit this joint report on the status of ESI discovery. The parties have engaged in productive discussions regarding the parameters for ESI discovery. The Parties will continue to meet and confer about protocols for handling ESI, including production format and metadata, and the identification, collection and review of ESI.

The parties intend to work collaboratively to resolve ESI issues that arise in the course of discovery and will endeavor to resolve any related disagreements without the Court's involvement. At this time, the parties do not have any disputes to raise concerning ESI discovery, but will bring any disputes that cannot be resolved after good faith discussions promptly to the Court's attention.

Date: June 30, 2023

Respectfully submitted,

s/ David W. Ogden

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CERTIFICATE OF SERVICE

I hereby certify that on June 30, 2023, I electronically filed the foregoing document with the Clerk of Court using this Court's CM/ECF system, which will send a Notice of Electronic

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s/ David W. Ogden _____
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