

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

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

Plaintiff,

v.

CIGNA CORPORATION, CIGNA  
HOLDINGS, INC., CONNECTICUT  
GENERAL CORP., HEALTHSPRING, INC.,  
NEW QUEST LLC, HEALTHSPRING LIFE &  
HEALTH INSURANCE COMPANY, INC.,  
GULF QUEST LP, PHYSICIANS  
MANAGEMENT LLC, and ALEGIS CARE  
SERVICES, LLC,

Defendants.

**Case No. 3:21-cv-00748**  
**JUDGE RICHARDSON**  
**MAGISTRATE JUDGE FRENSELY**

UNITED STATES OF AMERICA,

Plaintiff-Intervenor,

v.

THE CIGNA GROUP, BRAVO HEALTH  
MID-ATLANTIC, INC., BRAVO HEALTH  
PENNSYLVANIA, INC., CIGNA HEALTH &  
LIFE INS. CO., CIGNA HEALTHCARE OF  
CALIFORNIA, INC., CIGNA HEALTHCARE  
OF COLORADO, INC., CIGNA  
HEALTHCARE OF CONNECTICUT, INC.,  
CIGNA HEALTHCARE OF GEORGIA, INC.,  
CIGNA HEALTHCARE OF NORTH  
CAROLINA, INC., CIGNA HEALTHCARE  
OF SOUTH CAROLINA, INC., CIGNA  
HEALTHCARE OF ST. LOUIS, INC.,  
HEALTHSPRING OF FLORIDA, INC., and  
HEALTHSPRING LIFE & HEALTH INS. CO.,

Defendants.

**JOINT MOTION TO ENTER STIPULATION AND ORDER OF DISMISSAL**

The Parties, by and through counsel, jointly move the Court to enter the proposed Stipulation and Order of Dismissal attached to this Motion.

Respectfully submitted,

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United States Attorney for the  
Southern District of New York

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*Counsel for Defendants*

## CERTIFICATE OF SERVICE

I certify that copies of the foregoing and the attached proposed stipulation and order were served on October 24, 2023, by electronic means via the Court's electronic filing system, to the following:

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HEALTHSPRING OF FLORIDA, INC., and  
HEALTHSPRING LIFE & HEALTH INS. CO.,

Defendants.

**Case No. 3:21-cv-00748**  
**JUDGE RICHARDSON**  
**MAGISTRATE JUDGE FRENSELY**

**STIPULATION AND  
ORDER OF DISMISSAL**

WHEREAS, on September 29, 2023, a Stipulation and Order of Settlement and Dismissal (“Stipulation”), ECF No. 271-1, was entered into by and among (i) plaintiff the United States of America (the “United States”), by its attorneys, Damian Williams, United States Attorney for the Southern District of New York, and Henry C. Leventis, United States Attorney for the Middle District of Tennessee; (ii) relator Robert A. Cutler (“Relator”), by his authorized representatives; and (iii) defendants The Cigna Group, Bravo Health Mid-Atlantic, Inc., Bravo Health Pennsylvania, Inc., Cigna Health & Life Ins. Co., Cigna Healthcare of California, Inc., Cigna Healthcare of Colorado, Inc., Cigna Healthcare of Connecticut, Inc., Cigna Healthcare of Georgia, Inc., Cigna Healthcare of North Carolina, Inc., Cigna Healthcare of South Carolina, Inc., Cigna Healthcare of St. Louis, Inc., HealthSpring of Florida, Inc., and HealthSpring Life & Health Ins. Co. (collectively “Defendants,” and together with the United States and Relator, the “Parties”), by their authorized representatives;

WHEREAS, the Court approved the Stipulation on September 29, 2023, ECF Nos. 272-273; and

WHEREAS, the United States has received the payment required to be made by Paragraph 3 of the Stipulation;

NOW, THEREFORE, upon the Parties’ agreement, IT IS HEREBY ORDERED that:

1. This action is hereby DISMISSED pursuant to Fed. R. Civ. P. 41(a) subject to the terms of the Stipulation. The dismissal is with prejudice as to Relator. The dismissal is with prejudice as to the United States only as to the Covered Conduct defined in the Stipulation, and otherwise without prejudice as to the United States.

2. The Court shall retain jurisdiction to enforce the terms of the Stipulation.

Dated: October 24, 2023

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Dated: October 24, 2023

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*Counsel for the United States*

Dated: October 24, 2023

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Dated: October 24, 2023

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*Counsel for Defendants*

SO ORDERED:

Dated: \_\_\_\_\_

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HON. ELI RICHARDSON  
United States District Judge