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August 6, 2026

VIA CM/ECF

Hon. Paul A. Engelmayer
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *United States v. The New York and Presbyterian Hospital*, No. 26 Civ. 02480 (S.D.N.Y.)

Dear Judge Engelmayer:

This letter responds on behalf of New York and Presbyterian Hospital (“NYP”) to the United States’ July 27, 2026 letter request to compel three categories of documents (ECF 43). The United States asks that these materials be produced within 14 days of a Court ruling. By letter of July 29, 2026, which the Court endorsed, NYP requested that it be given until today to submit its response to permit the parties time to continue discussions. The parties have been discussing a resolution, and NYP believes the issues raised in the United States’ letter are now largely moot.

With respect to Request 1, which asks for organizational charts, NYP has produced a current organizational chart with relevant personnel and will promptly produce similar organizational charts for January 1 of each year since 2021. NYP anticipates that this production will be completed within two weeks.

With respect to Request 3, which asks for agreements with commercial payors, NYP has agreed to produce these agreements promptly. NYP began producing these agreements on a rolling basis last night and anticipates that this production will be completed within two weeks.

With respect to Request 4, which asks for Board materials, the United States already has a full set of responsive Board materials for April 22, 2024 to April 22, 2025 from the pre-suit investigation. NYP has agreed to produce non-privileged Board materials dating back to April 2021 but the parties have not agreed how to address materials that are irrelevant to the case. Undersigned counsel is in the process of collecting and reviewing responsive materials and anticipates being in a position to inform the United States within two weeks if there are

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categories of Board documents that are irrelevant to this litigation. That is the only issue that remains unresolved.

NYP respectfully requests that the parties be given this time for additional discussion and report back to the Court by August 24, 2026.

Respectfully submitted,

/s/ Joon H. Kim

Joon H. Kim

Cc: All counsel of record (via ECF)