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March 31, 2026

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**VIA EMAIL AND COURT FILING**

The Honorable Katharine H. Parker  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Room 750  
New York, New York 10007

**Re: United States of America v. Anthem, Inc., 1:20-cv-02593-ALC-KHP**

Dear Judge Parker:

We represent Defendant Anthem, Inc. (“Anthem”). Anthem respectfully submits materials for *in camera* review in connection with Anthem’s Position Statement in Opposition to Plaintiff’s Demand for Further Testimony from Deborah Bradley, filed simultaneously with this letter.

Anthem is submitting these materials *in camera* because they reflect attorney-client privileged information and protected work product relevant to the parties’ dispute. The submission includes the as-filed versions of (i) Anthem’s Position Statement in Opposition to Plaintiff’s Demand for Further Testimony from Deborah Bradley; (ii) the Declaration of Michael P. Matthews in Support of Anthem’s Position Statement and associated privileged exhibits; and (iii) the Declaration of Benjamin D. Singer in Support of Anthem’s Position Statement. For the convenience of the Court, Anthem also includes unprivileged exhibits attached to those declarations, which will also be filed on the public docket.

Because Anthem’s Position Statement, the Declaration of Michael P. Matthews, and the Declaration of Benjamin D. Singer all contain privileged information, the as-filed versions contain redactions of that privileged information. Anthem’s *in camera* submission includes both the as-filed redacted versions and the unredacted versions.

To facilitate the Court’s review, all *in camera* materials have been compiled into a ZIP file, which will be transmitted to the email address Parker\_NYSDChambers@nysd.uscourts.gov.

The ZIP file contains the following subfolders:

1. Anthem’s Position Statement in Opposition to Plaintiff’s Demand for Further Testimony from Deborah Bradley
2. Declaration of Michael P. Matthews in Support of Anthem’s Position Statement, and Exhibits

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3. Declaration of Benjamin D. Singer in Support of Anthem's Position Statement, and Exhibits

We appreciate the Court's attention to these materials and are available to provide any further information the Court may require for its resolution of the parties' dispute.

Sincerely,

*/s/ James A. Bowman*

*James A. Bowman*  
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**VIA ELECTRONIC DELIVERY AND COURT FILING**

The Honorable Katharine H. Parker  
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New York, New York 10007

**Re: United States v. Anthem, Inc. (Case No. 1:20-cv-02593-ALC-KHP) - Motion for Leave to File Under Seal**

Dear Judge Parker:

Pursuant to Rule 3(d) of this Court's Individual Rules of Practice, Defendant Anthem, Inc. ("Anthem") writes respectfully to request permission to provisionally file documents in redacted form and under seal in connection with its Position Statement in Opposition to Plaintiff's Demand for Further Testimony from Deborah Bradley ("Position Statement"). Specifically, it seeks to file its Position Statement and the Declaration of Michael P. Matthews ("Matthews Declaration") in redacted form, and Exhibit 1 to the Matthews Declaration under seal, because these materials contain information—or quote information—that has been provisionally designated Attorneys' Eyes Only by under the parties' Amended Joint Stipulation and Protective Order (Dkt. 371). The proposed documents to be filed provisionally under seal will be filed in accordance with the Court's sealing procedures.

Anthem's motion for leave to seal these materials is separate and apart from its *in camera* submission associated with this filing, regarding which Anthem has filed a letter simultaneously with this motion.

Consistent with the Court's past orders and the parties' agreement, Anthem requests that the parties be permitted 30 days to either: (1) file a motion to seal that sets forth the grounds and legal basis for sealing the material, or (2) inform the Court they do not intend to file such a motion.

Anthem therefore moves the Court for leave to file the attached documents provisionally under seal. Anthem thanks the Court for its consideration of this request.



Dated: March 31, 2026

Respectfully submitted,

By: /s/ James A. Bowman

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