

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES, ex rel. DR. SUSAN NEDZA,)	
)	
Relator,)	Case No. 15-cv-6937
)	
v.)	Judge Alonso
)	Magistrate Judge Cox
AMERICAN IMAGING MANAGEMENT, INC.,)	
et al.,)	
)	
Defendants.)	
)	

**NOTICE OF MOVANTS’ JOINDER IN DEFENDANTS’ REPLIES IN SUPPORT OF
MOTIONS TO DISMISS**

Defendants American Imaging Management, Inc., Anthem, Inc., Anthem Health Plans of Kentucky, Inc., Anthem Health Plans of New Hampshire, Inc., Anthem Health Plans, Inc., Anthem Insurance Companies, Inc., Blue Cross of California, Blue Cross and Blue Shield of Georgia, Inc., Blue Cross Blue Shield Healthcare Plan of Georgia, Inc., Community Insurance Company, Compcare Health Service Insurance Corp., Empire HealthChoice HMO, Inc., Empire HealthChoice Assurance, Inc., HMO Colorado, Inc., HMO Missouri, Inc., Blue Cross of Idaho Care Plus, Inc., PacificSource Community Health Plans and Moda Health Plan, Inc. (“Movants”) hereby join in Defendants Health First Health Plans, Inc., Priority Health, Providence Health Plan, Providence Health Assurance, Blue Cross and Blue Shield of North Carolina, Regence BlueCross BlueShield of Oregon, Regence BlueCross BlueShield of Utah, Regence BlueShield, Regence Blue Shield of Idaho, Asuris Northwest Health, and Blue Cross Blue Shield of Michigan Mutual Insurance Company’s Replies in Support of their Motions to Dismiss the

Second Amended Complaint (Dkts. 189, 191, 192, 193, 195, 196).¹ For the reasons set forth therein, as well as in Movants' Motion to Dismiss and supporting Reply, Relator's Second Amended Complaint should be dismissed with prejudice.

Dated: July 6, 2018

Respectfully submitted,

/s/ Lisa M. Noller

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¹ Movants, with the exception of Moda Health Plan, Inc., also hereby join in Defendant Moda Health Plan, Inc.'s Supplemental Reply in Support of Motion to Dismiss Relator's Second Amended Complaint (Dkt. 194).

Colorado, Inc., HMO Missouri, Inc., Blue Cross of Idaho Care Plus, Inc. and PacificSource Community Health Plans.

and

/s/ David Goldhaber
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CERTIFICATE OF SERVICE

I hereby certify that, on July 6, 2018, a copy of the foregoing document was electronically filed through the ECF system and will be sent electronically to all persons identified on the Notice of Electronic Filing.

/s/ Lisa M. Noller
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