

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

PACIFIC INPATIENT MEDICAL
GROUP, INC., on behalf of itself and
all others similarly situated,

Plaintiff,

v.

ZELIS HEALTHCARE, LLC; ZELIS
CLAIMS INTEGRITY, LLC; ZELIS
NETWORK SOLUTIONS, LLC; AETNA,
INC.; THE CIGNA GROUP; ELEVANCE
HEALTH INC.; HUMANA, INC.,

Defendants.

Case No.: 1:25-CV-10734-BEM

DENNIS AYER, DDS, LLC and
SMILE LINE, LLC, on behalf of itself
and all others similarly situated,

Plaintiff,

v.

ZELIS HEALTHCARE, LLC; ZELIS
CLAIMS INTEGRITY, LLC; ZELIS
NETWORK SOLUTIONS, LLC; AETNA,
INC.; THE CIGNA GROUP; ELEVANCE
HEALTH INC.; UNITED HEALTH GROUP,
INC.,

Defendants.

Case No.: 1:25-CV-11092-BEM

DANNY BACHOUA
CHIROPRACTIC, APC., on behalf of
itself and all others similarly situated,

Plaintiff,

v.

ZELIS HEALTHCARE, LLC; ZELIS
CLAIMS INTEGRITY, LLC; ZELIS
NETWORK SOLUTIONS, LLC; AETNA,
INC.; THE CIGNA GROUP; ELEVANCE
HEALTH INC.; HUMANA, INC.,

Defendants.

Case No.: 1:25-CV-11167-BEM

**DEFENDANTS’ RESPONSE TO PLAINTIFFS’ MOTION FOR
CONSOLIDATION OF CASES AND APPOINTMENT OF INTERIM COUNSEL**

Defendants Zelis Healthcare, LLC, Zelis Claims Integrity, LLC, Zelis Network Solutions, LLC, Aetna, Inc., The Cigna Group, Elevance Health, Inc., and Humana, Inc., (collectively, “Defendants”) respectfully submit this response to Plaintiffs’ Notice of Motion for Consolidation of Cases and Appointment of Interim Counsel filed in *Pacific Inpatient Medical Group, Inc. v. Zelis Healthcare LLC*, No. 1:25-cv-10734-BEM, (Dkt. 15).

Defendants do not oppose Plaintiffs’ request to consolidate the above-captioned cases, provided that they receive sufficient time – *i.e.*, not less than sixty (60) days – to respond to the proposed consolidated amended complaint. Defendants understand that Plaintiffs are willing to negotiate a mutually agreeable schedule for such responses and any associated briefing. Should the Court grant consolidation, Defendants will work with Plaintiffs to submit a proposed schedule for the Court’s approval.

Defendants take no position with respect to the request for the appointment of interim class counsel.

Respectfully submitted,

/s/ Matthew L. McGinnis

Matthew L. McGinnis (BBO# 666120)
Jane E. Willis (BBO# 568024)
ROPES & GRAY LLP
Prudential Tower
800 Boylston Street
Boston, MA 02199
Telephone:(617)-951-7000
matthew.mcginnis@ropesgray.com
jane.willis@ropesgray.com

***Attorneys for Defendants Zelis Healthcare, LLC,
Zelis Claims Integrity, LLC, and Zelis Network
Solutions, LLC***

/s/ George Borden

George Borden
Katherine Anne Trefz (*pro hac vice* forthcoming)
Jonathan Pitt (*pro hac vice* forthcoming)
Williams & Connolly LLP
680 Maine Avenue SW
Washington, DC 20024
Telephone: 202-403-5038
gborden@wc.com
ktrefz@wc.com
jpitt@wc.com

Attorneys for Defendant Aetna, Inc.

/s/ Brett Boskiewicz

Brett Boskiewicz
McDermott Will & Emery LLP
200 Clarendon Street
Boston, MA 02116
Telephone: (617) 535-4000
Facsimile: (617) 535-3800
bboskiewicz@mwe.com

Joshua B. Simon, (*pro hac vice*)
Warren Haskel, (*pro hac vice*)
McDermott Will & Emery LLP
One Vanderbilt Ave
New York, NY 10017

Telephone: 212-547-5356
jsimon@mwe.com
whaskel@mwe.com

Attorneys for Defendant The Cigna Group

/s/ Maria R. Durant

Maria R. Durant (BBO #558906)
Hogan Lovells US LLP
125 High Street, Ste. 2010
Boston, MA 02110
Telephone: 617-371-1024
Maria.Durant@hoganlovells.com

E. Desmond Hogan (*pro hac vice* forthcoming)
W. David Maxwell (*pro hac vice* forthcoming)
Hogan Lovells US LLP
Columbia Square
555 Thirteenth Street, NW
Washington, DC 20004
Telephone: (202) 637-5600
desmond.hogan@hoganlovells.com
david.maxwell@hoganlovells.com

Attorneys for Defendant Elevance Health, Inc.

/s/ Abena Mainoo

Abena Mainoo (BBO #677622)
Joseph Kay (*pro hac vice* forthcoming)
Cleary Gottlieb Steen & Hamilton LLP
One Liberty Plaza
New York, NY 10006
Telephone: 212-225-2000
amainoo@cgsh.com
jkay@cgsh.com

Heather Nyong'o (*pro hac vice* forthcoming)
Cleary Gottlieb Steen & Hamilton LLP
650 California Street
Suite 2400
San Francisco, CA 94108
Telephone: 415-796-4480
hnyongo@cgsh.com

Attorneys for Defendant Humana, Inc.

CERTIFICATE OF SERVICE

I hereby certify that, on this 21st day of May 2025, the foregoing was filed with the Court's electronic filing system, which will send electronic notice of this filing to all counsel of record.

/s/ Matthew L. McGinnis _____

Matthew L. McGinnis
Attorney for Defendants Zelis Healthcare, LLC,
Zelis Claims Integrity, LLC, and Zelis Network
Solutions, LLC