

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

<p>IN RE: ZELIS REPRICING ANTITRUST LITIGATION</p> <p>This Document Relates To:</p> <p>All Associated Cases</p>	<p>Lead Action Case No: 1:25-cv-10734-BEM</p> <p><i>Consolidated with Case Nos.:</i>  <i>1:25-CV-11092-BEM</i>  <i>1:25-CV-11167-BEM</i>  <i>1:25-CV-11537-BEM</i></p>
---	--

**JOINT STATEMENT, RULE 26(f) REPORT, AND  
[PROPOSED] PRETRIAL SCHEDULE**

Pursuant to the Court's April 16, 2026 and April 20, 2026 Orders (Dkt. Nos. 194, 197), Counsel for the parties submit this Joint Statement, Rule 26(f) Report, and Proposed Pretrial Schedule under Federal Rules of Civil Procedure 16 and 26(f), and D. Mass. Local Rule 16.1.

**I. Fed. R. Civ. P. 26(f) and L.R. 16.1 Conference**

**A. Rule 26(f) Meet-and-Confer Discussion**

On April 28, 2026, counsel for the parties addressed, under Rule 26(f)(2), (i) the nature and basis of their claims and defenses and the possibility for promptly settling or resolving the case; (ii) making or arranging for the disclosures required by Rule 26(a)(1); (iii) any issues about preserving discoverable information; (iv) developing a proposed discovery plan; and (v) that the attorneys of record must submit to the Court a written report outlining that plan.

**B. L.R. 16.1 Meet-and-Confer Discussion**

Also on April 28, 2026, counsel for the parties met and conferred and discussed: (i) an agenda of matters for consideration at a scheduling conference, to be scheduled at the Court's convenience; (ii) a proposed pretrial schedule for the case that includes a discovery plan; (iii) whether the parties will consent to trial by magistrate judge; (iv) settlement proposals and whether

alternative dispute resolution would aid in resolving the litigation; and (v) a plan to file a joint statement containing a proposed pretrial schedule; and (vi) Local Rule 16.1(d)(3) certifications.

## II. Proposed Pretrial Schedule

During the April 28, 2026 meet-and-confer, the parties discussed a pretrial schedule.

Plaintiffs' and Defendants' respective pretrial schedule proposals are as follows:

Event	Plaintiffs' Proposed Date	Defendants' Proposed Date
Initial disclosures exchanged	May 12, 2026	May 12, 2026
Initial set of requests for production of documents must be served	N/A	May 29, 2026
Deadline for producing party's disclosure of initial list of proposed document custodians and custodial sources	June 12, 2026	June 26, 2026
Deadline for producing party's production of organizational charts with full names, companies, departments/divisions, titles/roles and dates	June 12, 2026	Defendants' position is that it is premature to set such a deadline where discovery requests have not yet been served and there may or may not be disputes concerning which corporate entities are relevant in this case. Defendants are confident the parties will be able to reach a reasonable agreement on this issue once document requests have been served.
Deadline to meet and confer regarding non-custodial document sources, search terms, TAR/AI, and all scoping parameters	June 26, 2026	July 2, 2026
Deadline to agree to or submit separate proposals for TAR protocol	July 10, 2026	July 17, 2026

<b>Event</b>	<b>Plaintiffs' Proposed Date</b>	<b>Defendants' Proposed Date</b>
Deadline to agree to or submit separate proposals for deposition protocol and number of fact depositions	July 10, 2026	July 17, 2026
Deadline for parties to disclose data fields, along with their respective location, meaning, relationship and any other data that can assist in determining their significance or pertinence	July 24, 2026	Defendants' position is that it is premature to set such a deadline where discovery requests have not yet been served.
Deadline for any motions for leave to amend the pleadings	September 18, 2026	September 18, 2026
Deadline to complete production of structured data [Plaintiffs request rolling productions]	January 8, 2027	April 16, 2027  Defendants cannot commit to rolling productions of structured data before any such production requests have been served.
All requests for production of documents and interrogatories must be served	March 15, 2027	September 8, 2027
All requests for admission must be served	April 23, 2027	October 6, 2027
All depositions, other than expert depositions, must be completed by	May 14, 2027	November 19, 2027
Close of fact discovery	May 14, 2027	November 19, 2027
Pre-conference status report	May 25, 2027	December 8, 2027
Status conference	May 27, 2027	December 10, 2027
Plaintiffs' disclosure of expert witnesses and reports	June 16, 2027	December 30, 2027

<b>Event</b>	<b>Plaintiffs' Proposed Date</b>	<b>Defendants' Proposed Date</b>
Defendants' disclosure of expert witnesses and reports	August 16, 2027	March 6, 2028
Plaintiffs' disclosure of rebuttal expert and report	September 30, 2027	May 12, 2028
Close of expert discovery, including depositions	October 21, 2027	June 9, 2028
Plaintiffs' motion for class certification	November 4, 2027	June 16, 2028
Defendants' response to motion for class certification; <i>Daubert</i> motions	December 13, 2027	July 28, 2028
Plaintiffs' reply in support of class certification; response to <i>Daubert</i> motions	January 26, 2028	September 8, 2028
Replies to <i>Daubert</i> motions	February 10, 2028	September 25, 2028
Class certification hearing	<i>To be set by the Court</i>	<i>To be set by the Court</i>
Motions for summary judgment	10 days after close of opt-out period for any certified class or 60 days after an order denying class certification	60 days after close of opt-out period for any certified class or 60 days after an order denying class certification
Oppositions to motions for summary judgment	45 days after the parties file summary judgment motions	60 days after the parties file summary judgment motions
Replies in support of motions for summary judgment	28 days after the summary judgment oppositions	45 days after summary judgment oppositions
Pre-trial conference	<i>To be set by the Court</i>	<i>To be set by the Court</i>

Event	Plaintiffs' Proposed Date	Defendants' Proposed Date
Trial	<i>To be set by the Court</i>	<i>To be set by the Court</i>

#### A. Plaintiffs' Position Regarding Proposed Pretrial Schedule

Plaintiffs' proposed schedule seeks to move this litigation forward in an expeditious and efficient manner while, at the same time, accommodating Defendants' expressed concerns. Following the parties' meet-and-confer on April 28, 2026, Plaintiffs carefully analyzed Defendants' proposed schedule and suggested a compromise position could be reached. Accordingly, Plaintiffs extended the proposed dates from their initial proposal to Defendants, set forth above, reflecting Plaintiffs' effort to meet Defendants' position where appropriate while taking caution not to needlessly prolong dates into the future.

The parties' most significant delta concerns the timeline for the production of structured data. Recognizing this divergence, during the meet-and-confer, Plaintiffs asked Defendants' counsel why they believed nearly one year (over 11 months) would be necessary to produce structured data. Defendants' counsel compared the situation to *In re MultiPlan Health Ins. Provider Litig.*, Case No. 1:24-cv-06795 (N.D. Ill.), where disputes regarding the identification and scope of structured data fields resulted in considerable delays.

Plaintiffs believe that *MultiPlan* supports a more expeditious schedule, not a similar or longer one. During the meet-and-confer, Plaintiffs shared that their discovery requests will largely mirror those in *MultiPlan*. Unlike in *MultiPlan*, however, the parties can benefit from the substantial groundwork already completed there, including the identification of relevant structured data fields and the production of comparable—if not identical—datasets. Because much of that work in terms of disputes over relevant fields and implementation of an actual collection process

has already been completed, there is no reason for this case to proceed on the same prolonged timeline. To further streamline this process, Plaintiffs have proposed an early date for the parties to identify and disclose data fields, along with their respective locations, meanings, and relationships. Even so, Plaintiffs have already made a significant compromise by proposing nearly eight months to complete the production of structured data on a rolling basis.

Plaintiffs also propose two production deadlines Defendants do not: one for organizational charts and one for data fields, and related helpful information. These deadlines are intended to assist Plaintiffs in getting up to speed in terms of the types of data available, as well as developing their understanding as to where Defendants' data is located and how the data is organized, which will assist them in making more streamlined, efficient and coherent discovery requests, with an eye to avoiding motion practice.

Plaintiffs' proposed schedule thus provides sufficient time for the completion of discovery while ensuring that discovery progresses in a timely manner without unnecessary delay.

### **B. Defendants' Position Regarding Proposed Pretrial Schedule**

The class action claims in this case concern a supposed antitrust conspiracy spanning nearly a decade among eight Defendants, whom Plaintiffs accuse of suppressing payments for out-of-network services through the use of repricing technology solutions.<sup>1</sup> Defendants' proposed case schedule is commensurate with—indeed, necessary for—the facially complex nature of this case and the scope of discovery that Plaintiffs' counsel apparently intend to seek.

---

<sup>1</sup> On August 11, 2025, United filed a motion to compel arbitration as to Dennis C. Ayer, Pacific Inpatient Medical Group, and Frank J. Scaccia; Ele Vance filed a motion to compel arbitration as to Danny Bachoua Chiropractic, APC; and Aetna filed a motion to compel arbitration as to Dennis C. Ayer. Dkt. 101, 105, 107. On March 4, 2026, the Court granted the motions to compel arbitration. Dkt. 184. Thus, these claims are stayed, pending arbitration. *Id.*; see also *Smith v. Spizzirri*, 601 U.S. 472, 478 (2024). The claims of the absent class members, in whole or in part, should also be compelled to arbitration.

Courts have long recognized that antitrust litigation generally involves complex and time-consuming discovery and motion practice, particularly where class action claims are involved.<sup>2</sup> For that reason, courts in such cases routinely adopt case schedules granting ample time (such as 24 or 30 months) to complete fact discovery. *See, e.g., In re Realpage Software Antitrust Litig.*, No. 3:23-cv-3071 (M.D. Tenn.) ECF No. 1213 (24 months for fact discovery); *De Coster v. Amazon.com*, No. 2:21-cv-693 (W.D. Wash.) ECF. Nos. 68, 393 (approximately 30 months for fact discovery). Here, Defendants’ proposed schedule, under which the parties would have 18 months for fact discovery, including 11 months to produce (and resolve any issues over) structured data, falls well within the timeframes so-ordered in other antitrust cases. That is particularly true here, where the complexity is compounded by several factors: discovery has not yet begun—no disclosures or discovery have been served; there are eight defendants, each with different custodians, IT systems, data formats, and privilege review; and a compressed schedule would inevitably generate the kind of repeated mid-case modification requests and discovery disputes that burden the Court’s docket and ultimately cost more time than a realistic schedule would have required in the first instance.

Plaintiffs’ counsel all but agree: they informed Defendants during the parties’ Rule 26(f) conference that they intend to seek discovery comparable to (and modeled after) the discovery under way in *In re Multiplan Health Insurance Provider Litigation*, No. 1:24-cv-06795 (N.D. Ill.) (“*Multiplan*”). *Multiplan* is a separate antitrust class action focused on a much larger provider of healthcare financial solutions where, among other things, the current discovery and pre-trial

---

<sup>2</sup> *See, e.g., Bell Atl. Corp. v. Twombly*, 550 U.S. 544, 560 n.6 (2007) (describing antitrust class action with seven-year alleged timeframe as “a sprawling, costly, and hugely time-consuming undertaking” that poses case management challenges); *In re Puerto Rican Cabotage Antitrust Litig.*, 815 F. Supp. 2d 448, 459 (D.P.R. 2011) (recognizing that antitrust class actions are “notoriously complex”) (quoting *In re Visa Check/Mastermoney Antitrust Litig.*, 297 F. Supp. 2d 503, 510 (E.D.N.Y. 2003)).

schedule spans 42 months; the Court has issued 29 case management orders;<sup>3</sup> and discovery regarding the production of structured data alone has taken 18 months to date due to the need to produce multiple terabytes of data and repeated disputes over “the scope, format, and deadlines for the production of structured data.”<sup>4</sup> Indeed, even in this case, Plaintiffs’ counsel intends to seek a quantity of depositions well beyond the default limit—not because they have identified potential witnesses exceeding that limit, but apparently based on the number of depositions that were permitted in *Multiplan*.

Plaintiffs, however, take the position that Defendants can produce volumes of discovery comparable to *Multiplan* in a truncated timeframe of only 12 months, even though the parties have not yet exchanged initial disclosures, nor have any discovery requests been served. That is both unrealistic and out of step with the case schedules typically adopted in antitrust cases. Just by way of example, under Plaintiffs’ proposed schedule, the parties would have just over four months after completing production of structured data to take the numerous depositions that Plaintiffs’ counsel apparently seek here. Plaintiffs’ proposed schedule rests on their unsupported speculation that things can go faster simply because some of the Defendants in this case are also parties in *Multiplan*. But that disregards the discovery to be produced for the first time in this case: none of the Zelis Defendants are involved in *Multiplan*, while Defendant Humana was neither a named Defendant in the *Multiplan* class action nor in any related direct action bellwether cases, and thus has not produced any discovery in *Multiplan*. The Zelis Defendants and Humana, who have not yet received Plaintiffs’ discovery requests (and thus not yet begun data collection), cannot be expected to meet Plaintiffs’ unrealistic timetable.

---

<sup>3</sup> See *Multiplan* Litigation Dkt. 664, Case Management Order No. 29.

<sup>4</sup> *Multiplan* Dkt. 530 at 1.

As for the Defendants also named in *MultiPlan*, the discovery that has been produced in *MultiPlan* is not the same discovery that is relevant and proportional to the different Plaintiffs, different vendor (Zelis), and different factual allegations at issue in this case. While there may be some overlap, all Defendants will need to undertake the usual process of identifying relevant custodians and non-custodial sources, negotiating the scope of responsive material with Plaintiffs, collecting and reviewing materials from those sources, and producing them. The parties will also need to take depositions relating to Plaintiffs' specific claims in this case. Moreover, Plaintiffs' counsel have not articulated any reason to believe that the disputes over structured data leveled by the plaintiffs' counsel in *Multiplan* (and the time it has taken to resolve them) would not also be an issue here.

Accordingly, in anticipation of Plaintiffs' proposed discovery scope, and based on counsel's experience litigating these types of matters, Defendants have proposed a reasonable and measured scheduling order that makes good sense in light of Plaintiffs' counsel's stated intentions regarding discovery and would minimize needless applications to the Court for modification of the case schedule.

### **III. Discovery Plan**

#### **A. Rule 26(f)(3)(A): What Changes Should Be Made to Timing, Form, or Requirement for Disclosure Under Rule 26(a), Including Timing of Initial Disclosures**

The parties discussed Rule 26(a) initial disclosures at the April 28, 2026 meet-and-confer, agreeing that initial disclosures will take place on May 12, 2026.

**B. Rule 26(f)(3)(B): The Subjects on Which Discovery May Be Needed, When Discovery Should be Completed, and Whether Discovery Should be Conducted in Phases or Be Limited to or Focused on Particular Issues**

During the April 28, 2026 meet-and-confer, the parties discussed discovery, with Plaintiffs' counsel noting their position that much of the discovery will be similar in nature as that involved in the *In re MultiPlan Health Ins. Provider Litig.*, Case No. 1:24-cv-06795 (N.D. Ill.). The parties do not believe phased discovery is necessary, though the parties agree to set an interim deadline for the production of structured data prior to the close of fact discovery.

**C. Rule 26(f)(3)(C): Issues about Disclosure, Discovery, or Preservation of Electronically Stored Information, Including the Form or Forms in Which it Should Be Produced**

Under Rule 26(f)(3)(C), the parties discussed issues concerning disclosure, discovery, and preservation of electronically stored information ("ESI"). Plaintiffs provided and the Defendants have revised a proposed pretrial preservation order, which addresses the requirement to preserve discoverable information. The parties expect to submit a proposed pretrial preservation order to the Court.

**D. Rule 26(f)(3)(D): Issues about Claims of Privilege or of Protection as Trial-Preparation Materials, Including the Timing and Method for Complying with Rule 26(b)(5)(A) and – If the Parties Agree on a Procedure to Assert these Claims after Production – Whether to Ask the Court to Include their Agreement in an Order under Federal Rule of Evidence 502**

Under Rule 26(f)(3)(D), the parties discussed privilege and protection-related issues. They are currently exchanging edits to a number of proposed pretrial orders that consider such privilege, protection, and litigation/trial-preparation considerations. The parties expect to submit these proposed pretrial orders to the Court.

**E. Rule 26(f)(3)(E): Possible Changes to be Made in the Limitations on Discovery Imposed Under These Rules or by Local Rules, and what Other Limitations, if any, Should be Imposed**

Under Rule 26(f)(3)(E), the parties agreed that modifications to the discovery limits provided under L.R. 26.1(c) may become necessary, but that it is premature to determine what specific modifications may be appropriate.

**F. Rule 26(f)(3)(F): Any other orders that the court should issue under Rule 26(c) or under Rule 16(b) and (c)**

Under Rule 26(f)(3)(F), the parties discussed and have exchanged drafts of a number of proposed pretrial orders and stipulations, including a proposed ESI protocol, preservation order, expert stipulation, and HIPAA-qualified protective order. The parties expect to submit these proposed pretrial orders and stipulations to the Court.

**IV. Agenda of Matters to Be Discussed at Scheduling Conference**

Under L.R. 16.1(b)(1), the agenda of matters to be discussed at the scheduling conference, to be scheduled at the Court's convenience, will resemble the topic headings included in this written report.

**V. Whether the Parties Consent to Trial by Magistrate Judge**

The parties do not consent to trial by Magistrate Judge, as contemplated by L.R. 16.1(b)(3).

**VI. L.R. 16.1(d)(3) Certifications**

The parties' Local Rule 16.1(d)(3) certifications will be filed forthwith.

Dated: April 30, 2026

Respectfully submitted,

/s/ Richard M. Paul III

Richard M. Paul III, *pro hac vice*  
Mary Jane Fait, *pro hac vice*  
Haley Hawn, *pro hac vice*  
**PAUL LLP**  
600 Broadway Boulevard, Suite 600  
Kansas City, Missouri 64105  
Telephone: (816) 984-8100  
Rick@PaulLLP.com  
MaryJane@PaulLLP.com  
Haley@PaulLLP.com

Jason S. Hartley, *pro hac vice*  
Jason M. Lindner, *pro hac vice*  
Maureen Forsyth, (MA Bar No. 642390)  
Kenneth Frost, *pro hac vice*  
**HARTLEY LLP**  
101 W. Broadway, Ste 820  
San Diego, CA 92101  
Telephone: (619) 400-5822  
hartley@hartleyllp.com  
lindner@hartleyllp.com  
forsyth@hartleyllp.com  
frost@hartleyllp.com

***Co-Lead Counsel for Plaintiffs and the Putative Class***

Amanda F. Lawrence  
**SCOTT+SCOTT ATTORNEYS AT LAW LLP**  
156 South Main Street  
P.O. Box 192  
Colchester, CT 06415  
Telephone: (860) 531-2606  
alawrence@scott-scott.com

Katrina Carroll  
Kyle A. Shamberg  
**CARROLL SHAMBERG LLC**  
111 W. Washington Street  
Suite 1240  
Chicago, IL 60602  
Telephone: 872-215-6205  
katrina@csclassactions.com  
kyle@csclassactions.com

Patrick Coughlin, *pro hac forthcoming*  
Fatima Brizuela, *pro hac forthcoming*  
**SCOTT+SCOTT ATTORNEYS AT LAW LLP**  
600 West Broadway, Suite 3300  
San Diego, CA 92101  
Telephone: (619) 798-5308  
pcoughlin@scott-scott.com  
fbrizuela@scott-scott.com

Adam J. Zapala (245748)  
Elizabeth T. Castillo (280502)  
Christian S. Ruano (352012)  
**COTCHETT, PITRE  
& McCARTHY, LLP**  
840 Malcolm Road  
Burlingame, CA 94010  
Telephone: (650) 697-6000  
Fax: (650) 697-0577  
azapala@cpmlegal.com  
ecastillo@cpmlegal.com

John Landay, *pro hac vice forthcoming*  
**LANDAY ROBERTS LLP**  
600 West Broadway, Suite 700  
San Diego, California 92101  
Telephone: (619) 648-4811  
jlanday@landayroberts.com

David M. Cialkowski, *pro hac vice*  
Ian F. McFarland, *pro hac vice*  
**ZIMMERMAN REED LLP**  
1100 IDS Center  
80 S. 8th St.

Daniel J. Mogin, *pro hac vice forthcoming*  
**MOGIN LAW LLP**  
4225 Executive Square, Suite 600

La Jolla, CA 92037  
Telephone: (619) 687-6611  
dmogin@moginlawllp.com

Daniel R. Karon, *pro hac vice forthcoming*  
**KARON LLC**  
631 W. St. Clair Ave.  
Cleveland, OH 44113  
Telephone: (216) 622-1851  
dkaron@karonllc.com

Solomon B. Cera, *pro hac vice forthcoming*  
**CERA LLP**  
50 California Street, Suite 1500  
San Francisco, CA 94111  
Telephone: (415) 777-2230  
scera@cerallp.com

C. Andrew Dirksen, (MA Bar No. 568773)  
**CERA LLP**  
529 Main St., Suite P200  
Boston, MA 02129  
Telephone: (857) 453-6555  
cdirksen@cerallp.com

Minneapolis, MN 55402  
(612) 341-0400  
david.cialkowski@zimmreed.com  
ian.mcfarland@zimmreed.com

Garrett D. Blanchfield  
Brant D. Penney  
Roberta A. Yard  
**REINHARDT WENDORF &  
BLANCHFIELD**  
80 South 8th Street, Suite 900  
Minneapolis, MN 55402  
Telephone: (651) 287-2100  
g.blanchfield@rwblawfirm.com  
b.penney@rwblawfirm.com  
r.yard@rwblawfirm.com

\* \* \*

/s/ Matthew L. McGinnis  
Matthew L. McGinnis (BBO# 666120)  
Jane E. Willis (BBO# 568024)  
Sandra H. Masselink (BBO# 696687)  
**ROPES & GRAY LLP**  
Prudential Tower  
800 Boylston Street  
Boston, MA 02199  
(617) 951-7000  
Jane.Willis@ropesgray.com  
Matthew.McGinnis@ropesgray.com  
Sandra.Masselink@ropesgray.com

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

George Borden  
Katherine Anne Trefz (*pro hac vice*)  
Jonathan Pitt (*pro hac vice*)  
**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.***

Brett Boskiewicz (BBO #656545)  
**McDERMOTT WILL & SCHULTE LLP**  
200 Clarendon Street  
Boston, MA 02116  
Telephone: (617) 535-4000  
Facsimile: (617) 535-3800  
bboskiewicz@mcdermottlaw.com

Joshua B. Simon (*pro hac vice*)  
Warren Haskel (*pro hac vice*)  
Emily T. Chen (*pro hac vice*)  
Chelsea Cosillos (*pro hac vice*)  
**McDERMOTT WILL & SCHULTE LLP**  
One Vanderbilt Ave  
New York, NY 10017  
Telephone: 212-547-5400  
Facsimile: 212-547-5444  
jsimon@mcdermottlaw.com  
whaskel@mcdermottlaw.com  
echen@mcdermottlaw.com  
ccosillos@mcdermottlaw.com

***Attorneys for Defendant The Cigna Group***

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*)  
Justin Bernick (*pro hac vice*)  
W. David Maxwell (*pro hac vice*)  
**HOGAN LOVELLS US LLP**  
Columbia Square  
555 Thirteenth Street, NW  
Washington, DC 20004

Telephone: (202) 637-5600  
desmond.hogan@hoganlovells.com  
justin.bernick@hoganlovells.com  
david.maxwell@hoganlovells.com

***Attorneys for Defendant Elevance Health, Inc.***

Scott C. Solberg (*pro hac vice*)  
Vanessa G. Jacobsen (*pro hac vice*)  
Benjamin E. Waldin (*pro hac vice*)  
**EIMER STAHL LLP**  
224 South Michigan Ave., Suite 1100  
Chicago, IL 60604  
ssolberg@eimerstahl.com  
vjacobsen@eimerstahl.com  
bwaldin@eimerstahl.com

***Attorneys for Defendant Humana Inc.***

Rachel S. Brass (*pro hac vice*)  
**GIBSON, DUNN & CRUTCHER LLP**  
One Embarcadero Center Suite 2600  
San Francisco, CA 94111  
Telephone: 415-393-8293  
rbrass@gibsondunn.com

Heather L. Richardson (*pro hac vice*)  
Christopher D. Dusseault (*pro hac vice*)  
Joshua Lipton (*pro hac vice*)  
**GIBSON, DUNN & CRUTCHER LLP**  
333 South Grand Ave., 54<sup>th</sup> Floor  
Los Angeles, CA 90071  
Telephone: 213-229-7409  
hrichardson@gibsondunn.com

Allison O'Neil (BBO # 641330)  
Kara Kelleher (BBO # 713274)  
**TROUTMAN PEPPER LOCKE**  
111 Huntington Ave., 9<sup>th</sup> Floor  
Boston, MA 02199  
Telephone: 617-443-3744  
Allison.oneil@troutman.com  
Kara.kelleher@troutman.com

***Attorneys for Defendant UnitedHealth Group, Inc.***

**CERTIFICATE OF SERVICE**

I hereby certify that, on this 30th day of April, 2026, 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