



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

September 8, 2026

Via ECF

The Honorable Katharine H. Parker
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States of America v. Anthem, Inc.*, No. 20 Civ. 2593 (ALC) (KHP)

Dear Judge Parker:

This Office represents the United States of America (the “Government”) in the above-referenced case. Pursuant to the Court’s June 23, 2026, Scheduling Order (ECF No. 530), the Government and Defendant Anthem, Inc. (“Anthem”) jointly submit the following proposed agenda for the upcoming conference.

Agenda for September 15, 2026, Conference

I. Disputes

- a. Rule 30(b)(6) deposition topics. Anthem’s response to the Government’s topics and the Government’s response to Anthem’s topics. On September 1, 2026, the parties filed position statements addressing these disputes (ECF No. 571; ECF No. 574, at 1–7),¹ and on September 10, 2026, the parties will be filing opposition position statements related to these disputes, pursuant to the Court’s July 22, 2026, Order (ECF No. 555).
- b. Requests for Admission. The Government’s responses to Anthem’s First Set of Requests for Admission. Anthem’s September 1, 2026, position statement addressed this dispute (ECF No. 574, at 8–10), and the Government will be addressing it in its forthcoming September 10, 2026, opposition position statement.
- c. Interrogatories. Anthem’s response to the Government’s Second Set of Interrogatories and the Government’s response to Anthem’s Second Set of Interrogatories. The parties are filing position statements concerning these disputes on September 10, 2026, pursuant to the Court’s July 22, 2026, Order (ECF No. 555). Pursuant to that Order, the parties will not be filing opposition position statements to those submissions.

¹ In addition to the unsealed and redacted versions of the parties’ position statements referenced herein, the parties also filed sealed, unredacted versions of those statements. ECF Nos. 572, 575.

The parties are continuing to meet and confer about the disputed discovery and will respectfully inform the Court if any of those disputes that have been briefed are resolved and no longer require the Court's intervention.

We thank the Court for its attention to this matter and its consideration of the parties' agenda.

Respectfully submitted,

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cc: Counsel of record (via ECF)