



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

June 30, 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 July 7, 2026, Conference

I. Discovery Updates

- a. The parties have completed all noticed Rule 30(b)(1) depositions in this case, with the exception of the deposition of Peter Haytaian, Anthem’s former Executive Vice President, which is scheduled for July 1, 2026. As previously noted (ECF 531, 532), Anthem intends to seek 30(b)(1) depositions concerning the Centers for Medicare and Medicaid Services’ Notice of Intermediate Sanctions against Elevance Health after this Court rules on Anthem’s pending motion to compel production of additional documents. *See* Section II.a, *infra*.
- b. The parties continued to meet-and-confer about the Rule 30(b)(6) depositions noticed by the parties. The parties request that the Court set a schedule for position statements concerning all outstanding disputes in advance of the August 18, 2026, conference.
- c. The parties served their responses and objections to the other party’s interrogatories and requests for admission on June 24, 2026.

II. Disputes

- a. The parties’ disputes concerning Anthem’s First Set of Interrogatories and Second Set of Requests for Production, regarding which the parties submitted position statements on June 9, 2026, June 22, 2026, and June 29, 2026.

- b. The parties' disputes concerning the Government's Seventh Set of Requests for Production, which will be the subject of position statements submitted to the Court in accordance with the Court's June 30, 2026 Order (*see* ECF 536).
- c. The parties' dispute concerning Anthem's response to the Government's Second Set of Interrogatories, which will be the subject of position statements submitted to the Court in accordance with the Court's June 30, 2026 Order (*see* ECF 536).

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

Respectfully submitted,

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cc: Anthem's Counsel (Via ECF)