



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

April 7, 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 lawsuit. We write respectfully to request that the Court temporarily seal for thirty days, until May 7, 2026, the Government’s position statement (the “Position Statement”) in support of the Government’s request to direct third-party witness Deborah Bradley, a former employee of Cotiviti, Inc. (formerly known as Verscend), to answer questions regarding her communications with Anthem’s counsel in preparation for her deposition. Specifically, the Position Statement contains quotations from the transcript of Ms. Bradley’s February 24, 2026, deposition, which has been marked Attorneys’ Eyes Only pursuant to the Amended Joint Stipulation and Protective Order. *See* ECF No. 371.

In light of the Court’s April 10, 2024, Order directing the parties to “make a specific showing that higher values justify” any redactions remaining under seal (the “Sealing Order”), ECF No. 199, at 4, we also respectfully request that the same procedure that is set forth in the Court’s Sealing Order apply to the Government’s Position Statement, whereby a party may file a motion by May 7, 2026, requesting that the redacted information in the Position Statement remain under seal after May 7, 2026. *See id.*

Lastly, the Government respectfully requests permission to file on the docket a version of the Government’s Position Statement that redacts the information that has been designated as Attorneys’ Eyes Only so that the Position Statement remains appropriately on the public docket (except for those redactions) in the interim.

The Government notes that the Court recently granted a parallel request for provisional sealing of a position statement filed by Anthem. *See* ECF No. 460. Anthem consents to the Government’s request.

We thank the Court for its attention to this matter.

Respectfully submitted,

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By: /s/ Adam Gitlin

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cc: Counsel of record (via ECF)