



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

April 27, 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 27, 2026, the Government’s position statement (the “Position Statement”) in support of the Government’s request to direct Anthem, Inc. (“Anthem”) to produce Peter Haytaian, Anthem’s outgoing Executive Vice President, for a deposition. Specifically, the Position Statement contains quotations from: (1) documents that Anthem has produced that are marked Confidential pursuant to the Stipulation and Amended Protective Order (the “Protective Order”); and (2) the transcript of the deposition of a former Anthem employee, Gray King, which has been marked Attorneys’ Eyes Only pursuant to the Protective Order. *See* ECF No. 485.

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 27, 2026, requesting that the redacted information in the Position Statement remain under seal after May 27, 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 Confidential or 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 similar requests for provisional sealing of position statements filed by the Government and Anthem in connection with a separate dispute. *See* ECF Nos. 460, 465. 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)