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May 15, 2026

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**VIA ELECTRONIC DELIVERY AND COURT FILING**

The Honorable Katharine H. Parker  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Room 750  
New York, New York 10007

**Re: United States v. Anthem, Inc. (Case No. 1:20-cv-02593-ALC-KHP) - Motion for Leave to File Under Seal**

Dear Judge Parker:

Pursuant to Rule 3(d) of this Court's Individual Rules of Practice, Defendant Anthem, Inc. ("Anthem") writes respectfully to request permission to provisionally file documents in redacted form and under seal in connection with its Position Statement concerning the discovery disputes for which the parties have sought Court resolution (*see* Dkt.499). Specifically, it seeks to file its Position Statement in redacted form, and Exhibits A through E under seal, because these materials contain confidential information or quote information that has been designated Confidential or Attorneys' Eyes Only under the parties' Joint Stipulation and Protective Order (Dkt. 485). The proposed documents to be filed provisionally under seal will be filed in accordance with the Court's sealing procedures.

Consistent with the Court's past orders and the parties' agreement, Anthem requests that the parties be permitted 30 days to either: (1) file a motion to seal that sets forth the grounds and legal basis for sealing the material, or (2) inform the Court they do not intend to file such a motion.

Anthem therefore moves the Court for leave to file the attached documents provisionally under seal. Anthem thanks the Court for its consideration of this request.



Dated: May 15, 2026

Respectfully submitted,

By: /s/ James A. Bowman

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