

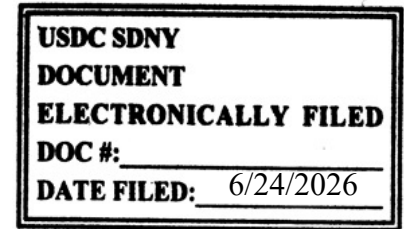


U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

June 24, 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 in this False Claims Act case. **We write jointly with defendant Anthem, Inc. to respectfully request an extension of the deadline for the completion of fact discovery, which is currently due by June 30, 2026, along with concomitant extensions of the applicable expert discovery deadlines.** While the parties have been working diligently to complete fact discovery, a few outstanding items remain, specifically: (i) outstanding issues concerning Anthem's response to the Government's Seventh and Eighth Sets of Requests for Production, served on February 20, 2026, and March 25, 2026, respectively, and which were discussed at the last case management conference; (ii) the parties' Rule 30(b)(6) depositions; (iii) outstanding issues concerning Anthem's First Set of Interrogatories and Second Set of Requests for Production; (iv) the deposition of Peter Haytaian, which is scheduled to take place on July 1; and (v) depositions Anthem intends to seek 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. The parties intend to raise disputes concerning certain of these issues at the upcoming case management conference. Additionally, the parties may have additional disputes arising from interrogatories and requests for admission to which the parties plan to serve responses this week. The parties respectfully request an extension of two months, to August 31, 2026, of the fact discovery deadline in order to complete these outstanding items. The parties respectfully request concomitant extensions of the applicable expert discovery deadlines, which preserve the same length of time between deadlines to which the parties previously agreed and this Court ordered. A proposed amended case management order is enclosed herewith.

We thank the Court for its consideration of this request.

Respectfully submitted,

JAY CLAYTON
United States Attorney

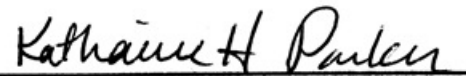
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cc: Counsel of record (via ECF)

PROPOSED AMENDED CASE MANAGEMENT ORDER

	Current Deadline	Proposed Deadline
Deadline for all fact discovery	June 30, 2026	August 31, 2026
Affirmative expert disclosures and reports	October 9, 2026	December 10, 2026
Rebuttal expert disclosures and reports	January 8, 2027	March 11, 2027
Deadline for all expert discovery	March 8, 2027	May 10, 2027

APPLICATION GRANTED



Hon. Katharine H. Parker, U.S.M.J.

6/24/2026