

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

IN RE: ZELIS REPRICING ANTITRUST
LITIGATION

Lead Action Case No.: 1:25-cv-10734-BEM

This Document Relates To:

Consolidated with Case Nos.:

All Associated Cases

1:25-CV-11092-BEM

1:25-CV-11167-BEM

1:25-cv-11537-BEM

**JOINT STIPULATION AND [PROPOSED] ORDER REGARDING UNITED
DEFENDANTS' DEADLINE TO ANSWER SECOND AMENDED CONSOLIDATED
CLASS ACTION COMPLAINT AND ARBITRATION**

Pursuant to Local Rule 7.1, Defendants UnitedHealth Group, Inc. ("UHG"), United Medical Resources, Inc., ("UMR"), HealthSCOPE Benefits, Inc. ("HSB") and Plaintiffs (collectively, the "Parties"), through their respective counsel, hereby stipulate as follows:

WHEREAS, on March 4, 2026, the Court granted UHG's Motion to Compel Arbitration as to Plaintiffs Denis C. Ayer DDS, LLC ("Ayer"), Pacific Inpatient Medical Group, Inc. ("PIMG"), and Frank J. Scaccia, M.D., F.A.C.S., L.L.C. ("Scaccia") and stayed the claims pending arbitration solely as to these Plaintiffs' claims against Defendant UHG. Order Granting Defendants' Motions to Compel Arbitration (ECF. No. 184 at 18);

WHEREAS, Plaintiffs were granted leave to file and did file a Second Amended and Consolidated Class Action Complaint ("SACCAC") on August 3, 2026, and, among other things, added Plaintiff 4 Missing Peace Corps, Inc. and Defendants UMR and HSB;

WHEREAS, UMR and HSB accepted service of Plaintiffs' SACCAC on August 7, 2026.

WHEREAS, during a meet and confer on August 10, 2026, UHG, UMR, and HSB advised Plaintiffs that they intended to file a motion to compel arbitration as to Plaintiff 4 Missing Peace

Corps, Inc., and that UMR and HSB intended to file a motion to compel arbitration as to Plaintiffs Ayer, PIMG, and Scaccia. The parties continued to discuss in correspondence thereafter;

WHEREAS, to avoid the need for unnecessary motion practice, the Parties stipulate that the following claims are delegated to the arbitrator for purposes of the arbitrator determining the appropriateness of pursuing resolution of the claims within the arbitral forum: (1) Plaintiff 4 Missing Peace Corps, Inc.'s claims against UHG, UMR, and HSB; and (2) Plaintiff Ayer's claims against UMR and HSB; (3) PIMG's claims against UMR and HSB; and (4) Scaccia's claims against UMR and HSB (the "Delegated Claims");

WHEREAS, consistent with the Court's prior Order on arbitration, the Parties stipulate that the Delegated Claims are stayed pending arbitration, if any, solely as to these Plaintiffs' claims against UHG, UMR, and HSB;

WHEREAS, Plaintiffs 4 Missing Peace Corps, Inc., Ayer, PIMG, and Scaccia each reserves its respective rights to challenge, dispute, object to an argument about arbitration before the arbitrator, and appeal any argument proposing arbitration and any determination by the arbitrator as to the appropriateness of arbitration, including as to the Delegated Claims; and

WHEREAS, the Parties also stipulate that UHG, UMR, and HSB's Answer to Plaintiffs' SACCAC is due on August 28, 2026, twenty-one (21) days from the date UMR and HSB accepted service of Plaintiffs' SACCAC.

IT IS SO STIPULATED, through Counsel of Record.

Dated: August 13, 2026

Respectfully submitted,

GIBSON, DUNN & CRUTCHER LLP

By: /s/ Joseph Gorman

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*Attorneys for Defendants UnitedHealth Group,
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HealthSCOPE Benefits, Inc.*

Dated: August 13, 2026

Respectfully submitted,

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[Proposed] Order

PURSUANT TO STIPULATION, IT IS HEREBY ORDERED:

1. Consistent with this Court's prior Order on Defendants' Motions to Compel Arbitration (ECF No. 184), Plaintiff 4 Missing Peace Corps, Inc.'s claims against Defendants UnitedHealth Group, Inc., United Medical Resources, Inc., and HealthSCOPE Benefits, Inc. are delegated to the arbitrator for purposes of determining the appropriateness of the arbitral forum as to those claims.

2. Plaintiff 4 Missing Peace Corps, Inc.'s claims solely against Defendants UnitedHealth Group, Inc., United Medical Resources, Inc., and HealthSCOPE Benefits, Inc. are stayed pending arbitration, if any.

3. The claims of Plaintiffs Denis C. Ayer DDS, LLC, Pacific Inpatient Medical Group, Inc., and Frank J. Scaccia, M.D., F.A.C.S., L.L.C.'s solely against Defendants United Medical Resources, Inc., and HealthSCOPE Benefits, Inc. are delegated to the arbitrator for purposes of determining the appropriateness of the arbitral forum as to those claims.

4. The claims of Plaintiffs Denis C. Ayer DDS, LLC, Pacific Inpatient Medical Group, Inc., and Frank J. Scaccia, M.D., F.A.C.S., L.L.C.'s solely against Defendants UnitedHealth Group, Inc., United Medical Resources, Inc., and HealthSCOPE Benefits, Inc are stayed pending arbitration, if any.

5. The deadline for UnitedHealth Group, Inc., United Medical Resources, Inc., and HealthSCOPE Benefits, Inc. to respond to Plaintiffs' Second Amended and Consolidated Class Action Complaint is August 28, 2026.

Dated: _____

Hon. Brian E. Murphy
Judge of the United States District Court

CERTIFICATE OF SERVICE

I hereby certify that, on August 13, 2026, the foregoing was filed with the Court's electronic filing system, which will send electronic notice of this filing to all counsel of record.

/s/ Joseph A. Gorman

Joseph A. Gorman