

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

IN RE: ZELIS REPRICING ANTITRUST
LITIGATION

This Document Relates to:

All Actions

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

Consolidated with Case Nos.:

1:25-cv-11092-BEM

1:25-cv-11167-BEM

1:25-cv-11537-BEM

JOINT STATUS REPORT

Pursuant to the Court's directive in its September 30, 2026 Memorandum and Order on Aetna Inc.'s Motion to Dismiss, the parties have met and conferred regarding the pleading deficiencies identified by the Court.

Several Defendants believe that the pleading deficiencies identified by the Court apply to the claims against them. Plaintiffs have informed Defendants that, in light of the Court's opinion, they intend to seek leave to amend the Second Amended and Consolidated Class Action Complaint to cure any deficiencies by Wednesday, October 21, 2026. Plaintiffs are continuing to meet and confer with Defendants regarding any perceived pleading deficiencies in an effort to minimize further motion practice.

To avoid burdening the Court with duplicative or unnecessary motions, Defendants intend to defer filing any motions based on these pleading deficiencies until after Plaintiffs have sought leave to amend (and after Defendants have had the opportunity to evaluate Plaintiffs' proposed amendments). Defendants expressly reserve all rights to file motions regarding these deficiencies.

Dated: October 6, 2026

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on the 6th day of October 2026, I caused a copy of the foregoing to be served, via ECF, on all counsel of record.

/s/ Richard M. Paul III