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*Attorney for Plaintiffs Aetna Network Services LLC
And Aetna Life Insurance Company*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

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AETNA NETWORK SERVICES LLC,	:	
AETNA LIFE INSURANCE COMPANY,	:	C.A. No.: 2:26-cv-06623-ES-MAH
	:	
<i>Plaintiffs,</i>	:	<i>Document Electronically Filed</i>
	:	
v.	:	Return Date: July 20, 2026
	:	
AMIT POONIA, ADITY SHARMA,	:	NOTICE OF MOTION TO SEAL
SPRINGFIELD SURGERY CENTER LLC,	:	
PARK AVENUE SURGERY CENTER LLC,	:	
BROOKLINE SURGERY CENTER LLC,	:	
INTERVENTIONAL PAIN MANAGEMENT	:	
AND ORTHO-SPINE CENTER LLC, NEW	:	
YORK INTERVENTIONAL PAIN	:	
MANAGEMENT, P.C., and PREMIER	:	
ANESTHESIA GROUP, P.C.,	:	
	:	
<i>Defendants.</i>	:	
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PLEASE TAKE NOTICE on July 20, 2026, or a date and time to be set
by the Court, Plaintiffs Aetna Network Services LLC and Aetna Life Insurance
Company (collectively, "Plaintiffs"), by and through their attorneys Robinson &

Cole LLP, shall move for the entry of an order, pursuant to Local Civil Rules 5.3(c) and 7.1, permanently sealing certain exhibits to Plaintiffs' Complaint [ECF Nos. 4-1 through 4-4].

This Motion is timely pursuant to Local Civil Rule 5.3(c)(2). Pursuant to Local Civil Rule 7.1(d)(4), no legal brief is required because all relevant proposed findings of fact and conclusions of law required by Local Civil Rule 5.3(c)(3) have been set forth in the Declaration Adam J. Petitt, Esq. submitted herewith.

PLEASE TAKE FURTHER NOTICE that, in support of the within motion, Plaintiffs shall rely upon the Declaration of Adam J. Petitt.

PLEASE TAKE FURTHER NOTICE that a copy of the proposed Findings of Fact and Conclusions of Law and Order Granting the Motion to Seal is submitted with this Notice.

PLEASE TAKE FURTHER NOTICE that a certificate attesting to the date and manner of service of these moving papers is submitted herewith.

Dated: June 18, 2026

Respectfully submitted,

ROBINSON & COLE LLP

By: /s/ Adam J. Petitt

Adam J. Petitt, Esq.

(N.J. ID # 020822008)

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DISTRICT OF NEW JERSEY**

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AETNA NETWORK SERVICES LLC,	:	C.A. No. 2:26-cv-06623-ES-MAH
AETNA LIFE INSURANCE COMPANY,	:	
	:	<i>Document Electronically Filed</i>
<i>Plaintiffs,</i>	:	
	:	
v.	:	
	:	
AMIT POONIA, ADITY SHARMA,	:	DECLARATION OF
SPRINGFIELD SURGERY CENTER LLC,	:	ADAM J. PETITT, ESQ.
PARK AVENUE SURGERY CENTER LLC,	:	IN SUPPORT OF MOTION TO
BROOKLINE SURGERY CENTER LLC,	:	SEAL
INTERVENTIONAL PAIN MANAGEMENT	:	
AND ORTHO-SPINE CENTER LLC, NEW	:	
YORK INTERVENTIONAL PAIN	:	
MANAGEMENT, P.C., and PREMIER	:	
ANESTHESIA GROUP, P.C.,	:	
	:	
<i>Defendants.</i>	:	
-----	X	

I, Adam Peittt, submit this Declaration in support of Plaintiffs Aetna Network
Services LLC and Aetna Life Insurance Company's (collectively, "Plaintiffs")

Motion to Seal certain exhibits attached to Plaintiffs' Complaint [ECF Nos. 4-1 through 4-4].

1. I am an attorney duly authorized to practice law in the State of New Jersey and a member in good standing of the bar of this Court. I am a partner of the law firm of Robinson & Cole LLP, counsel for Plaintiffs.

2. In accordance with Local Civ. R. 5.3(c)(3), attached hereto as Appendix A contains the table documenting all materials to be sealed by Plaintiffs in Exhibits A, E, H, and R [ECF Nos. 4-1 through 4-4] to their Complaint [ECF No. 1], the nature of the materials to be sealed, the legitimate private or public interest which warrants the relief sought, the clearly defined and serious injury that would result if the relief sought is not granted; and why a less restrictive alternative to the relief sought is not available. In summary, the information that Plaintiffs seek to protect from public disclosure is Plaintiffs' proprietary business information.

3. As this Motion is being submitted in connection with Plaintiffs' Complaint in this matter, this office has not contacted Defendants to inquire as to their positions on whether the materials that are the subject of this Motion should remain sealed.

4. Plaintiffs assert that they have a legitimate interest in maintaining the confidentiality of the redacted and sealed information contained in these filings and in avoiding the public disclosure of this information because it includes Plaintiffs'

proprietary business information, the disclosure of which would grant Aetna's business competitors an unfair competitive advantage. *See, e.g., Goldenberg v. Indel, Inc.*, 2012 WL 15909, at *3 (D.N.J. Jan. 3, 2012) (granting motion to seal "commercially sensitive and proprietary non-public business information"); *Bracco Diagnostics, Inc. v. Amersham Health Inc.*, 2007 WL 2085350, at *9-10 (D.N.J. July 18, 2007) (granting motion to seal where the public availability of documents containing confidential business information would have put a party at a competitive disadvantage).

5. Plaintiffs have an interest in maintaining the confidentiality of the redacted information contained in Exhibits A, E, H, and R [ECF Nos. 4-1 through 4-4] to their Complaint [ECF No. 1] as the documents contain proprietary business information, including the confidential terms of the Plaintiffs' facility agreements with certain Defendants.

6. Accordingly, Plaintiffs respectfully request that the Court seal Exhibits A, E, H, and R to their Complaint [ECF Nos. 4-1 through 4-4].

7. Plaintiffs submit that there is no less restrictive alternative available.

8. Plaintiffs respectfully submit that they have satisfied the criteria for sealing a judicial record set forth in Local Civil Rules 5.3. Accordingly, Plaintiffs request that the Court grant their motion to seal materials.

9. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: June 18, 2026

Respectfully submitted,

ROBINSON & COLE LLP

By: /s/ Adam J. Petitt

Adam J. Petitt, Esq.

(N.J. ID # 020822008)

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Stamford, CT 06901

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*Attorneys for Plaintiffs Aetna Network
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Appendix A to the Declaration of Adam J. Petitt, Esq.

Document Title/ECF No.	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Any Prior Order Sealing the Same Materials in the Pending Action	Party in Opposition to Sealing, if any, and Basis
Exhibit A to Complaint, [ECF No. 4-1]	Exhibit A is the Facility Agreement between Plaintiff Aetna Network Services LLC and Defendant Springfield Surgery Center LLC, comprising proprietary business information. <i>See</i> ECF No. 4-1.	If relief is not granted, Plaintiffs would be at a competitive disadvantage should its proprietary non-public business information and negotiated terms within its facility agreements be disclosed to competitors, prospective future in-network providers, and other market participants.	Plaintiffs seek to file the full Exhibit A under seal. It is believed that no less restrictive alternative is available to prevent the disclosure of Plaintiffs' proprietary business information.	No	This Motion is submitted in connection with Plaintiffs' Complaint. As such, Plaintiffs counsel has not contacted Defendants to inquire as to their positions on whether the materials that are the subject of this Motion should remain sealed.
Exhibit E to Complaint, [ECF No. 4-2]	Exhibit E is the Facility Agreement between Plaintiff Aetna Network Services LLC and Defendant Park Avenue Surgery Center LLC, comprising proprietary business information. <i>See</i> ECF No. 4-2.	If relief is not granted, Plaintiffs would be at a competitive disadvantage should its proprietary non-public business information and negotiated terms within its facility agreements be disclosed to competitors, prospective future in-network providers, and other market participants.	Plaintiffs seek to file the full Exhibit E under seal. It is believed that no less restrictive alternative is available to prevent the disclosure of Plaintiffs' proprietary business information.	No	See above.

Exhibit H to Complaint, [ECF No. 4-3]	Exhibit H is the Facility Agreement between Plaintiff Aetna Network Services LLC and Defendant Brookline Surgery Center LLC, comprising proprietary business information. <i>See</i> ECF No. 4-3.	If relief is not granted, Plaintiffs would be at a competitive disadvantage should its proprietary non-public business information and negotiated terms within its facility agreements be disclosed to competitors, prospective future in-network providers, and other market participants.	Plaintiffs seek to file the full Exhibit H under seal. It is believed that no less restrictive alternative is available to prevent the disclosure of Plaintiffs' proprietary business information.	No	See above.
Exhibit R to Complaint, [ECF No. 4-4]	Exhibit R is the Notice of Termination of the Facility Agreement between Plaintiff Aetna Network Services LLC and Defendant Springfield Surgery Center LLC, comprising proprietary business information. <i>See</i> ECF No. 4-4.	If relief is not granted, Plaintiffs would be at a competitive disadvantage should its proprietary non-public business information and negotiated terms within its facility agreements be disclosed to competitors, prospective future in-network providers, and other market participants.	Plaintiffs seek to file the full Exhibit R under seal. It is believed that no less restrictive alternative is available to prevent the disclosure of Plaintiffs' proprietary business information.	No	See above.

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

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AETNA NETWORK SERVICES LLC,	:	
AETNA LIFE INSURANCE COMPANY,	:	C.A. No.: 2:26-cv-06623-ES-MAH
	:	
<i>Plaintiffs,</i>	:	<i>Document Electronically Filed</i>
	:	
v.	:	
	:	
AMIT POONIA, ADITY SHARMA,	:	[PROPOSED] FINDINGS OF
SPRINGFIELD SURGERY CENTER LLC,	:	FACT AND CONCLUSIONS OF
PARK AVENUE SURGERY CENTER LLC,	:	LAW AND ORDER GRANTING
BROOKLINE SURGERY CENTER LLC,	:	MOTION TO SEAL
INTERVENTIONAL PAIN MANAGEMENT	:	
AND ORTHO-SPINE CENTER LLC, NEW	:	
YORK INTERVENTIONAL PAIN	:	
MANAGEMENT, P.C., and PREMIER	:	
ANESTHESIA GROUP, P.C.,	:	
	:	
<i>Defendants.</i>	:	
-----	X	

This matter having been opened before the Court upon Plaintiffs Aetna Network Services LLC's and Aetna Life Insurance Company's (collectively, "Plaintiffs") Motion to Permanently Seal portions of Plaintiffs' Complaint and

certain exhibits thereto [ECF Nos. 4-1 through 4-4], and the Court having considered the submissions in support of, any opposition to the Motion, if any, as well as the arguments of counsel, if any; and for good cause shown, the Court finds:

FINDINGS OF FACT

1. The information that Plaintiffs seek to seal consists of Plaintiffs' proprietary business information.

2. Avoiding the public disclosure of this information is necessary to prevent harm to the parties and to patients. *See e.g., Rosario v. Doe*, 2013 WL 3283903, at *2-3 (D.N.J. June 25, 2013) (sealing records containing proprietary information); *Goldenberg v. Indel, Inc.*, 2012 WL 15909, at *3 (D.N.J. Jan. 3, 2012) (granting motion to seal "commercially sensitive and proprietary non-public business information"); *Bracco Diagnostics, Inc. v. Amersham Health Inc.*, 2007 WL 2085350, at *9-10 (D.N.J. July 18, 2007) (granting motion to seal where the public availability of documents containing confidential business information would have put a party at a competitive disadvantage).

3. It is believed that no less restrictive alternative is available to prevent the disclosure of Plaintiffs' proprietary business information. This Motion to Seal has been narrowly tailored to seek sealing as to only those materials that have been deemed confidential.

CONCLUSIONS OF LAW

Upon consideration of the papers submitted in support of the Motion, the Court concludes that Plaintiffs have met their burden of proving, under L. Civ. R. 5.3 and applicable case law, that the information should be filed under seal. Specifically, the Court concludes that (a) Plaintiffs' June 5, 2026 Complaint and Exhibits A, E, H, and R thereto [ECF Nos. 4-1 through 4-4] contain confidential information; (b) Plaintiffs have a legitimate interest in maintaining the confidentiality of this information in order to protect against disclosure; (c) public disclosure of this information would result in clearly defined and serious injury; and (d) no less restrictive alternative to sealing the subject documents is available.

1. The foregoing conclusions are supported by relevant case law holding that the right of public access to court filings is not absolute and may be overcome by a showing such as made here, in the discretion of the trial court. *See Nixon v. Warner Comms., Inc.*, 435 U.S. 589, 603 (1978). The Court, upon such a proper showing, may in its discretion prevent confidential materials from being transmuted into materials presumptively subject to public access. *Leucadia, Inc. v. Applied Extrusion Techs., Inc.*, 998 F.2d 157, 166 (3d Cir. 1993).

BASED UPON the foregoing findings of fact and conclusions of law:

IT IS on this ____ day of _____, 2026, **ORDERED** that Defendants' Motion to Seal is hereby **GRANTED**; and it is **FURTHER ORDERED** that the

materials identified in Appendix A to the Declaration of Adam J. Petitt are hereby
PERMANENTLY SEALED.
