

**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

**DEFENDANT UNITEDHEALTH GROUP INC.'S STATEMENT OF NON-OPPOSITION
TO PLAINTIFFS' MOTION TO FILE SECOND AMENDED AND CONSOLIDATED
CLASS ACTION COMPLAINT**

STATEMENT OF NON-OPPOSITION

Defendant UnitedHealth Group Incorporated (“United”) submits this statement of Non-Opposition to Plaintiffs’ Motion to File a Second Amended and Consolidated Class Action Complaint (“Plaintiffs’ Motion”), filed on July 6, 2026. Dkt. 245. United’s decision to not oppose Plaintiffs’ Motion is not a waiver of its right to present any defenses or objections in this action or otherwise move to dismiss allegations in the complaint. Furthermore, in the event the Court permits amendment, United intends to file a Motion to Compel Arbitration as to at least one of the proposed new Plaintiffs.

Dated: July 30, 2026

Respectfully submitted,

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By: /s/ Rachel S. Brass

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CERTIFICATE OF SERVICE

I hereby certify that I have caused the above papers to be filed through the Court's ECF system, which will serve the papers electronically to all counsel of record.

Dated: July 30, 2026

/s/ Allison O'Neil

Allison O'Neil