

CLEARY GOTTlieb STEEN & HAMILTON LLP

AMERICAS
NEW YORK
SAN FRANCISCO
SÃO PAULO
SILICON VALLEY
WASHINGTON, D.C.
ASIA
HONG KONG
SEOUL

One Liberty Plaza
New York, NY 10006-1470
T: +1 212 225 2000
F: +1 212 225 3999
clearygottlieb.com

D: +1 212 225 2950
jkim@cgsh.com

EUROPE & MIDDLE EAST
ABU DHABI
BRUSSELS
COLOGNE
LONDON
MILAN
PARIS
ROME

August 20, 2026

VIA CM/ECF

Hon. Paul A. Engelmayer
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *United States v. The New York and Presbyterian Hospital*, No. 26 Civ. 02480 (S.D.N.Y.)

Dear Judge Engelmayer:

We write on behalf of The New York and Presbyterian Hospital (“NYP”) to respectfully request that the Court enter the Proposed Amended Protective Order enclosed as Exhibit A. A redline against the Protective Order (Dkt 55) is enclosed as Exhibit B.

The Proposed Amended Protective Order is the result of discussions between counsel for NYP, the United States, and third-party UnitedHealthcare Insurance Company of New York (“United”) under Paragraph 25 of the Protective Order.

NYP and United consent to the requested relief. The United States is continuing to evaluate the requested relief, and reserves the right to file a response.

Respectfully submitted,

/s/ Joon H. Kim
Joon H. Kim

Cc: All counsel of record via ECF

The Court has received a proposed protective order approved by defendant New York Presbyterian Hospital and by a third-party subpoena recipient, UnitedHealthcare Insurance Company of New York. However, the Court has been notified that the plaintiff, the United States, has not yet taken a position on the protective order. The protective order appears to be sensibly drawn, flexible, and well-suited to the needs of this litigation. Unless the Court has received specific objections from the United States by noon on Friday, August 28, 2026, the Court, in order to not delay the forward progress of this litigation, will approve the proposed protective order.

SO ORDERED.



PAUL A. ENGELMAYER
United States District Judge

Dated: August 24, 2026
New York, New York