

**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 AND PROPOSED AGENDA

Pursuant to the Court's Order at the July 8, 2026, Case Management Conference (Dkt. 252), counsel for the parties respectfully submit this Joint Status Report and Proposed Agenda in advance of the upcoming September 14, 2026, Status Conference before Judge Murphy at noon and Case Management Conference before Magistrate Judge Boal at 2:30 p.m. *See* Dkt. 279.

I. PROPOSED AGENDA

- A. Structured data
- B. Search terms
- C. Deadline for substantial completion of document productions
- D. Defendants' Motion to Compel Discovery. *See* Dkt. 296-299.

II. JOINT STATUS REPORT

A. Structured Data Requests

Plaintiffs' Statement: Pursuant to this Court's Order (Dkt. 274), Plaintiffs served Defendants Cigna, Aetna, Zelis, Humana, Elevance and United with a Second Set of Requests for Production of Structured Data on August 21, 2026. Defendants complain that Plaintiffs should have asked for structured data in their first set of Requests, but at that time, Defendants had not yet provided information about the structured data they maintain.

Plaintiffs followed the procedure set by the Court. Dkt. 222 (Scheduling Order). This Court's Scheduling Order required the parties to serve their First Sets of Requests for Production near the infancy of the case on May 26, 2026. *Id.* at 1. Then, over a month later on July 6, 2026, the parties were to "disclose data fields, along with their respective location, meaning, relationship and any other data that can assist in determining their significance or pertinence." *Id.* This sequence was not meaningless. The purpose of this exercise was to allow the parties to understand the universe of structured data maintained, what fields they maintained, what those fields meant, and to tailor any requests for structured data appropriately. The alternative would have been uninformed and inefficient Requests, rendering the disclosures meaningless. Following Defendants' disclosures, Plaintiffs worked diligently with each Defendant to clarify each structured data disclosure to ensure that Plaintiffs would request the necessary information in their forthcoming structured data Requests. Nearly a month in, Plaintiffs discovered that Zelis stores certain information related to out-of-network claims on a platform it had not previously disclosed. It is not novel to preface structured data Requests with disclosures and limited discovery.¹

It is inappropriate for Defendants to wield the discovery sequence contemplated against Plaintiffs. It is more than clear that Defendants *wished* Plaintiffs had issued their Requests for structured data without the benefit of Defendants' data disclosures and subsequent meet and confers. However, this was not the process contemplated in the Court's Order nor the path that Plaintiffs chose.

¹ Indeed, like here, Plaintiffs in *In re Multiplan*, included a request for samples of structured data in their First Set of Requests for Production served on January 28, 2025. Then, five months later on June 24, 2025, Plaintiffs served requests for the production of structured. Plaintiffs here proceeded months earlier.

Production of structured data by all parties is due by October 1, 2026. *See* Dkt. 222. Plaintiffs anticipate meeting this deadline. Humana states below that it cannot meet this deadline because it is not a defendant in *In re MultiPlan*. This does not excuse Humana's delay. Plaintiffs' Requests for structured data are not identical to those in *In re MultiPlan*, and Humana's non-involvement in that case—along with Zelis'—does not weigh on its production of structured data. Plaintiffs went to great lengths to tailor each Request for structured data to each Defendant, using data fields specific to that Defendant, to streamline the production of such data. Humana does not explain why this Court's October 1, 2026 deadline is unworkable.

All Defendants also unilaterally impose end-dates for their structured data production that Plaintiffs did not agree to. Humana asserts herein that it will only produce data from 2015 through the end of 2024 when it claims it exited the market for commercial health insurance. While Humana apparently ceased issuing new health plans at the end of 2024, it continues to issue dental plans. Dkt. 273 at ¶39. And to the extent Humana attempts to rely on the date it purportedly began "planning" its exit from commercial insurance to justify an earlier cutoff, the Court rejected that argument as a premature fact dispute in denying Humana's motion to dismiss. Dkt. 185 at 21 n.20. Regardless, Humana's unilateral limitation is far too narrow. The class period begins on June 13, 2016 and extends through the present. Dkt. 273 at ¶374. Under Humana's Relevant Time Period, production would capture only approximately 5 months of information before the start of the class period. This is insufficient to evaluate the claims and defenses at issue. Plaintiffs anticipate meeting and conferring with Humana on the Relevant Time Period for structured data production after it serves its responses and objections on September 21, 2026. The other Defendants also assert that they intend to unilaterally limit their structured data production to the end of 2025. Defendants

provide no explanation for this cutoff but if this expedites production, a supplemental production later in the case can resolve that issue.

Defendants’ Statement: On August 21, 2026, as ordered by the Court (Dkt. 274), Plaintiffs served their Second Set of Requests for Production which included requests regarding structured data.² Defendants are in the process of reviewing and responding to Plaintiffs’ structured data requests. Defendants’ responses and objections are due on September 21, 2026. Consistent with Plaintiffs’ position that “the parties can benefit from the substantial groundwork already completed [in *In re MultiPlan*], including the identification of relevant structured data fields and the production of comparable—if not identical—data sets,” Dkt. 203, Defendants anticipate producing structured data consistent with the productions made in *In re MultiPlan* and with a time period from 2015 where available through August 2025. Although Zelis is not a defendant in *In re MultiPlan*, it likewise anticipates producing structured data covering the same time period as the other Defendants,³ and Humana intends to produce data from 2015 through the end of 2024 when

² To wave away their delay, Plaintiffs claim that Defendants “wield the discovery sequence contemplated against Plaintiffs.” That is false, and in any event, Plaintiffs cannot square that delay with the fact that they made clear, at that outset of this case, that structured data productions consistent with those already negotiated in *In re MultiPlan* were acceptable—negating any need for an extended negotiation period. And Plaintiffs ignore that they have insisted on data productions in a far more expedited deadline than what the parties had in *MultiPlan* to produce their structured data, another reason why Plaintiffs should be more diligent in making their requests.

³ Plaintiffs’ mischaracterization of their communications with Zelis does not justify their delay in serving structured data requests. Contrary to their assertion, “Plaintiffs discovered” nothing: On July 28, Zelis disclosed an additional database that it believed might contain relevant structured data. Plaintiffs apparently disagreed, since their August 21, 2026 structured data requests do not seek any data from that additional database. Regardless, Zelis intends to produce data from this database by the October 1 deadline.

it exited the market for commercial health insurance.⁴ With the exception of Humana, Defendants anticipate making this structured data production by October 1, 2026.

Humana is not a defendant in any active cases in *In re MultiPlan* and it has not produced any data or documents in that litigation. Humana made that known to Plaintiffs' counsel at the outset of this case. As early as June 22, following receipt of Plaintiffs' First Requests for Production, Humana repeatedly implored Plaintiffs to make a complete request for data and let them know that failing to do so would compromise its ability to comply with the Court's October 1, 2026 deadline for production of structured data. Plaintiffs refused to do so until they were ordered to do so by this Court. Following receipt of Plaintiffs' August 21 requests (8 weeks from when Humana first requested Plaintiffs' data requests), Humana has worked diligently to understand and evaluate those requests, but it does not yet know how long it will take to gather the universe of all out-of-network claims for a decade long period. Humana's understanding, however, is that the process of gathering and producing such data in *In re MultiPlan* took many months. *See* Dkt. 203 at 8 (Joint Statement Regarding Pretrial Scheduling Proposals). Plaintiffs' expectation that Humana should be able to do the same in the less than six weeks that now remain after Plaintiffs' unwarranted delays is unreasonable. Despite Plaintiffs' delays, Humana has worked diligently to respond to Plaintiffs' requests as quickly as possible. At this juncture, Humana cannot confirm if it will be able to produce its structured data by October 1, 2026.

Defendants served their requests for structured data on Plaintiffs in their First Requests for Production on May 26, 2026. The parties continue to meet and confer on each Plaintiffs' available

⁴ Humana intends to meet and confer with Plaintiffs regarding their new point on the dental data timeframe.

data fields, and Defendants anticipate that Plaintiffs will make their structured data productions with the data fields that they have represented are available by October 1, 2026.

B. Search Terms

Plaintiffs' Statement: To avoid delay, Plaintiffs agreed to revise their timely-submitted July 31, 2026 search term revisions and additions per Defendants' request. After considerable time and effort, Plaintiffs sent each Defendant a Defendant-specific redline reflecting Plaintiffs' revisions and additions to each Defendant's proposed search terms. By way of background, the Parties exchanged proposed search terms for self-application on July 1, 2026. Defendants provided separate sets of proposed search terms for each Defendant. Because many of Defendants' search terms overlapped, Plaintiffs fashioned their revisions and additions to Defendants' proposed search terms as a global set. In doing so, Plaintiffs expressly anticipated individual strings as well.

Rather than engage with Plaintiffs' proposals, Defendants wholesale objected to them and, over a series of just five days from August 17-21, 2026, each Defendant demanded that Plaintiffs re-submit new search term proposals as individual redlines to each Defendants' July 1, 2026 proposal.⁵ Although time-consuming and highly inefficient, in an effort to advance the search terms process and avoid further delay, Plaintiffs complied. Plaintiffs worked diligently to complete that process and, by August 26, provided each Defendant with an individualized redline of each of their July 1 proposals reflecting Plaintiffs' proposed revisions and additions. Exs. A, 1, 2, 3, 4, 5.

In addition to presenting their revisions as Defendant-specific—something the ESI Protocol does not require⁶—Plaintiffs substantially narrowed their prior global proposal. Among

⁵ Humana wrote on August 17; Aetna wrote on August 18; United wrote on August 20; Cigna, Elevance, and Zelis all wrote the following day on August 21.

⁶ The relevant portion of the ESI Protocol reads: "Within 30 days of receiving the producing Party's proposed search terms, the requesting Parties will provide any proposed revisions and additions to the producing Party's search terms. For purposes of this paragraph, Defendants shall

other concessions, Plaintiffs voluntarily added many limiting connectors (“AND”) in their revised search strings to each Defendant. Plaintiffs undertook this additional work so that meaningful negotiations could occur. But Defendants were not satisfied with Plaintiffs’ concession. After putting Plaintiffs through the pointless exercise, several Defendants have—yet again—wholesale refused to engage with Plaintiffs’ revised proposals. Humana, for example, “objects to all of Plaintiffs’ proposed modifications to its terms.”⁷ Aetna, likewise, has declared that it “is unwilling to accept Plaintiffs’ additional proposed search terms since they go beyond the scope of what Aetna Inc. agreed to produce as part of its responses and objections to Plaintiffs’ RFPs.”⁸ And Defendants’ assertion that Plaintiffs have raised “no objection” to Defendants’ objections to Plaintiffs’ RFPs is demonstrably false. Plaintiffs have, for several months, engaged in meet-and-confer negotiations regarding Defendants’ data samples and structured data disclosures. Plaintiffs have also issued written correspondence to each Defendant regarding that Defendants’ objections to Plaintiffs’ RFPs and are currently conducting meet and confers regarding the same.

cooperate to provide a single set of proposed revisions and additions to Plaintiffs, with the understanding that there may be a set of global search terms and sets of individualized search terms.” See ESI Protocol, Dkt. 264, Section 3.E(d).

⁷ Recently, and only after Plaintiffs reached out to Humana about the inappropriateness of its blanket objections, Humana has agreed to “provide more specific objections to each search term and may, in some cases, propose modifications to its original search terms that incorporate elements of Plaintiffs’ revisions.”

⁸ In fact, during the last meet and confer, Aetna counsel declared *twice* that the only search terms Aetna will utilize are those that show it **did not** use Zelis. Plaintiffs, of course, require the documents that show Aetna did use Zelis. But more importantly, Plaintiffs’ allegations are not limited to the “use” of Zelis, regardless of Aetna’s tireless insistence otherwise. As set out in Plaintiffs’ opposition to Aetna’s renewed motion to dismiss, the Complaint alleges, among other things, that Aetna participated in the conspiracy by meeting, communicating with, or sharing CSI with competitors, and Aetna’s issuance of payments to Providers for OON healthcare services at artificially suppressed, repriced amounts. See Dkt. 297.

Defendants’ refusal to engage in good faith regarding search terms (including refusals to commit to TAR or a non-TAR review, discussed below) is neither appropriate nor conducive to progress. But perhaps more importantly, Defendants’ wholesale rejections of Plaintiffs’ proposed revisions and additions is not the process contemplated by the ESI Protocol. *See* ESI Protocol, Dkt. 264, Section 3.E.(a)-(g). The Search Term Negotiation Process requires that “the Producing party shall provide: (a) any objections to the receiving Parties’ proposed revisions including information sufficient to support its objections to the proposed revisions and additions.” *Id.* at 3.E.(e). Then “[a]fter exchanging proposed search terms, proposed revisions/additions, and any objections to proposed revisions/objections, the Parties shall promptly meet and confer in good faith to try to resolve any disputes as to the search terms to be applied to the producing Party’s materials. Any unresolved differences shall promptly be brought to the Court’s attention.” *Id.* at 3.E.(f). Defendants have attempted to circumvent negotiation and, instead, raise unripe disputes in this Report.

Plaintiffs remain willing to consider reasonable, supported objections to their proposed revisions and additions to their search terms. Of course, Plaintiffs will engage with more restrictive search terms where certain strings hit on nearly every document, so long as and after each Defendant discloses and meaningfully describes the source(s) of data to which the search terms are getting applied.⁹ At the same time, the percentages Defendants point to, standing alone, provide little meaningful information about overbreadth at this point. For example, Aetna—one of the nation’s largest health insurers—apparently has collected and searched only 614,952 documents.

⁹ It is worth nothing that only certain of Plaintiffs’ strings hit on a high number of documents. The parties can work to cure those strings. For example, Aetna apparently searched a total of 614,952 documents. One string hit on 542,932 documents. Many others, though, hit on documents in the 4-figures, and several others in the range of 200.

Similarly, Humana has apparently collected only 347,674 documents. These numbers come below that of the 656,019 documents collected by Plaintiffs, who are mostly small medical practices. Thus, hitting on a large percentage of Defendants’ surprisingly small collection does not necessarily establish that Plaintiffs’ terms are overbroad. The percentage of document hits necessarily depends on the scope of documents against which the terms are run. And Plaintiffs have yet to receive a hit report from Zelis.¹⁰ Even with the use of TAR, Plaintiffs did not intend the terms to be so broad that they were meaningless. But Plaintiffs cannot meaningfully respond absent Defendants’ identifying the specific basis for their objections and, where appropriate, providing a counterproposal. Plaintiffs cannot guess what limitations might satisfy Defendants or remedy issues.¹¹

Plaintiffs attempted—and still hope for—cooperation with Defendants. But Defendants cannot refuse to engage in the process mandated by the ESI Protocol and then ask the Court to “permit them to proceed with document review using their proposed search terms.” This would be manifestly unjust. The parties have not even met and conferred regarding Plaintiffs’ revised proposals nor the objections served on August 31, 2026 per Section 3.E.(f) of the ESI Protocol. If Defendants are genuinely concerned about “running out of time,” it is critical that Defendants engage with Plaintiffs as is required by the ESI Protocol. Defendants should not be permitted to

¹⁰ Plaintiffs have received hit reports from Defendants United, Aetna, Cigna, Humana, and Elevance. In response to Zelis’ request for an extension, Plaintiffs anticipate its hit report on September 8.

¹¹ Indeed, several specific objections Defendants identify for the first time in this Joint Status Report are news to Plaintiffs. It would have been far more useful if Defendants had raised them as part of the negotiation process. Defendants now complain, for example, that certain terms contain “no subject-matter limitation.” If this is truly Defendants’ concern, the fix is simple: Defendants should propose a subject matter limitation.

sidestep the search term negotiation and then bulldoze their preferred search terms through discovery by simply refusing to negotiate.

Plaintiffs believe the search term dispute is not ripe for the Court’s involvement, except in one respect. A new issue has arisen concerning appropriate scope and breadth of Plaintiffs’ search term proposals. They obviously depend, in part, on whether Defendants will use Technology Assisted Review (“TAR”) to further cull the body of documents returned by those searches. The Protocol requires the early disclosure of the use of TAR because that influences the nature of the search terms to be used. Ostensibly, no search term culling for TAR is appropriate, but in any case, search terms that cull the corpus before TAR are necessarily broader than the search terms used for a linear review. *See* ESI Protocol, Dkt. 264, Section E.3(a). During early meet-and-confers in this matter, all Defendants disclosed to Plaintiffs they intended to utilize TAR. Some Defendants have since changed their positions, half-way through the negotiation of search terms, and declined to take a definitive position. For example, Elevance recently stated that “at this time,” it does not intend to use TAR to cull documents from its collection. Similarly, during a meet and confer on August 31, 2026, counsel for Aetna stated that Aetna may or may not use TAR depending on if it “accepts” Plaintiffs’ search terms.¹²

This uncertainty materially impacts the search term negotiation process. Plaintiffs are being asked to formulate and defend the scope of their search terms without knowing whether

¹² Aetna’s statement that Plaintiffs’ search terms “cover topics such as private equity investors, board advisors, and employee hiring and termination decisions—that bear no relationship to Aetna Inc.’s use (or non-use) of Zelis’s out-of-network repricing tools” demonstrates Aetna’s continued misunderstanding of Plaintiffs’ allegations against it. Plaintiffs’ allegations are not limited to the “use” of Zelis, regardless of Aetna’s tireless insistence otherwise. As is set out in Plaintiffs’ opposition to Aetna’s renewed motion to dismiss, allegation concern, among other things, Aetna participated in the conspiracy by meeting, communicating with, or sharing CSI with competitors, and Aetna’s issuance of payments to Providers for issuance OON healthcare services at artificially suppressed, repriced amounts. *See* Dkt. 297.

Defendants will further cull the documents using TAR. At the same time, Defendants contend that Plaintiffs' proposals are overbroad, but broad search terms are appropriate when used in conjunction with TAR to further limit a party's production. It is prejudicial for Defendants to withhold their intention on whether they will use TAR and also argue that Plaintiffs' search terms are overbroad. Plaintiffs request that the Court direct each Defendant to confirm, per the Protocol, whether it will use TAR so that the parties can meaningfully negotiate appropriate search terms.

Defendants' Statement: Defendants respectfully request the Court to resolve the Parties' dispute over search terms so that Defendants may review and produce documents as soon as possible. Two months of negotiation have not meaningfully narrowed the gap between the Parties and further rounds of negotiation will delay review and jeopardize Defendants' ability to meet the discovery deadlines in this case.

As detailed in the prior Joint Status Report, Dkt. 274, Defendants each proposed reasonable, individualized search terms on July 1. Defendants' individual proposals were each appropriately tailored to their respective document collections, custodians, responses and objections to Plaintiffs' RFPs, and intended review methodology (whether TAR or linear review). Section V.E.3(d) of the ESI Protocol required Plaintiffs to respond with "proposed revisions and additions" to each Defendant's terms. Instead, on July 31 Plaintiffs served a single set of 74 "Universal Strings" to be applied indiscriminately across every Defendant's collection—untethered to any Defendant's proposal or to the responses to Plaintiffs' RFPs, to which Plaintiffs had "raised no objections." Dkt. 274 at 10–11.

The Court recognized at the last status conference that Plaintiffs' Universal Strings are overbroad. Following the status conference, each Defendant promptly reached out to Plaintiffs to again object to Plaintiffs' terms and explain the numerous issues in Plaintiffs' "Universal Strings."

Of particular note, Plaintiffs’ July 31 proposal included excessive use of wildcard modifiers appended to already-broad root words, which has the practical effect of running tens of thousands of individual search terms for a single search string. Those defects were severe enough that some Defendants’ e-discovery vendors had difficulty generating hit reports for each objected-to term as Plaintiffs drafted them because the terms were unreasonably difficult to test and analyze.

Plaintiffs’ subsequent revisions did not cure the problem. The revised strings still join common business terms with “OR,” with no subject-matter limitation and no proximity connector. One string combines “pric!,” “cost!,” “amount!,” “level!,” OR “expen!”—with no subject-matter limitation. *See, e.g.*, Defs.’ Ex. A (Plaintiffs’ revisions to Aetna Inc.) Revision No. 34. Another includes the terms “market!,” “market rat!,” “invoic!,” OR “full pric!” which would capture any document mentioning “marketing,” “marketplace,” or “market” in any context. *See, e.g.*, Defs.’ Ex. A Revision No. 29. A third combines “pa!,” “contract!,” “data!,” “info!,” OR “proprietary!”—again with no subject-matter limitation—which would capture any document containing the words “page,” “paper,” “party,” “past,” or other terms unrelated to the claims in this litigation. *See, e.g.*, Defs.’ Ex. A Revision No. 48. Predictably, these terms hit on the vast majority of documents in each Defendant’s collection (over 90% of the entirety of the document collection for many Defendants).

Defendants are responding by accepting certain of Plaintiffs’ proposed terms with appropriate modifications and have provided or will provide hit counts for the terms they object to. Plaintiffs are thus wrong that Defendants are not identifying the basis for their objections or “where appropriate, providing a counterproposal.”¹³ That is precisely what Defendants are doing.

¹³ Contrary to Plaintiffs’ suggestion, the ESI protocol does not require any specific line-by-line form for objections—the hit reports Defendants provided, along with their stated objections, clearly show why Plaintiffs’ proposals are unworkable. Plaintiffs also suggest that “Defendants

But the gap between each side’s proposals remains enormous. Plaintiffs have never explained why any Defendant’s terms are unreasonable or what relevant documents their terms would capture that each Defendant’s would not. Plaintiffs instead defend the breadth of their search terms on the ground that Defendants have not definitively confirmed whether they will use Technology Assisted Review (“TAR”).¹⁴ But the overbreadth of Plaintiffs’ terms is apparent on their face, regardless of the use of TAR. Nothing in the TAR Protocol authorizes Plaintiffs to propose indiscriminate terms on the theory that technology will eventually sort out the relevant from the irrelevant. Instead, as is best practice for the use of TAR, the negotiated TAR protocol in this case permits the use of search terms to cull the set of documents subject to TAR. *See* Dkt. 261 (TAR Protocol) at 2–4; *Livingston v. City of Chicago*, 2020 WL 5253848, at *3 (N.D. Ill. Sept. 3, 2020) (explaining “pre-TAR culling will achieve the best possible review” and that to *only* use TAR

identif[ie]d for the first time in this Joint Status Report” that they object to terms that “contain ‘no subject-matter limitation.’” That is false. Defendants repeatedly highlighted in the last Joint Status Report that one of their objections to Plaintiffs’ “Universal Strings” was that they contained “no subject matter limitation.” ECF No. 274 at 10, 12. And it should come as no surprise to Plaintiffs that Defendants will only agree to search for documents that are limited to the subject matter of this litigation.

¹⁴ Plaintiffs claim that in “early meet-and-confers in this matter, all Defendants disclosed to Plaintiffs they intended to utilize TAR.” That is inaccurate—there was no meet-and-confer in which such a representation was made. In fact, the stipulated TAR Protocol states that “No Party is required to use TAR in connection with its review and production of documents.” Dkt. 261. Further, contrary to Plaintiffs’ baseless accusation that Elevance changed course away from TAR “half-way through the negotiation of search terms,” Elevance made clear at the outset, in its July 1, 2026 search term proposal, that it “intends to utilize search terms as the primary culling methodology.” Defs.’ Ex. B, July 1, 2026 Ltr. from B. Barringer. And as to Aetna Inc., it is Plaintiffs’ unreasonable positions that have made it impossible for Aetna to conclusively decide whether to undertake a manual review or utilize TAR. While Aetna Inc. has told Plaintiffs it intends to manually review documents for responsiveness to the set of RFPs Aetna Inc. has agreed to produce, reviewing roughly 17,000 documents manually (as would be required under Aetna Inc.’s already broad terms) is an entirely different proposition than reviewing over 600,000 documents (as would be required under Plaintiffs’ terms). If Aetna Inc. is forced to use Plaintiffs’ terms, it will be forced to utilize TAR to help reduce the cost of such an unduly burdensome review.

“would be wasteful and unduly burdensome, and would further delay the resolution [of the case]”). Asking for search terms that hit on practically all of a party’s documents is clearly inconsistent with the parties’ agreed-upon process.

Finally, the parties are running out of time. As discussed below (*see* Section C, *infra*), the parties are proposing deadlines for substantial completion of document productions ahead of the close of fact discovery in March 2027. Defendants will be unlikely to meet either deadline if Plaintiffs continue their same plodding pace in responding and, when they do, provide search terms that continue to be unreasonably overbroad.¹⁵ Given that time is of the essence, Defendants respectfully request that the Court permit them to proceed with document review using their proposed search terms.

* * *

Additional Statement of Aetna Inc.: In addition to the global issues with Plaintiffs’ search terms addressed above, Plaintiffs’ proposed terms involve an additional issue related to Aetna Inc. As detailed in its pending motion to dismiss, Aetna Inc. has repeatedly informed Plaintiffs that it has never used the Zelis out-of-network repricing tools at issue in this litigation. Plaintiffs did not—and have not—identified any good-faith factual basis for alleging otherwise. Instead, they have simply insisted that there is “*some* relationship between Aetna and Zelis that we need to explore in discovery.” Dkt. 271-4 at 1.

¹⁵ Forecasting even further delay on their part, Plaintiffs raise for the first time in this JSR *an entirely new issue* that they say they say must be resolved before “Plaintiffs will engage with more restrictive search terms.” Plaintiffs say they will only do so “after each Defendant discloses and meaningfully describes the source(s) of data to which the search terms are getting applied.” Defendants are not aware of any outstanding questions from Plaintiffs on this issue—each Defendant disclosed its custodians and non-custodial sources months ago, and Plaintiffs have raised no issues with those custodians or sources.

For the reasons discussed in its motion to dismiss, Aetna Inc. does not believe it should be in this case (or be subject to any discovery). But in the interim, as part of its Responses and Objections to Plaintiffs’ Requests for Production—served over two months ago on June 25—Aetna Inc. agreed to produce a limited set of documents to prove that it does not use Zelis’s out-of-network repricing tools, such as documents and communications concerning Zelis’s out-of-network repricing tools and any contracts or agreements between Aetna Inc. and Zelis (to the extent they exist).¹⁶ And the individualized search terms that Aetna Inc. proposed were crafted to be limited to this narrow set of documents that Aetna Inc. agreed to produce.

On August 18, Aetna Inc. sent a letter to Plaintiffs objecting to Plaintiffs’ 74 “Universal Strings” pursuant to Section V.E.3(e) of the ESI Protocol, including on the ground that Plaintiffs’ “Universal Strings” were not tailored to the documents that Aetna Inc. agreed to produce. On August 26, Plaintiffs sent Aetna Inc. revised search terms. Those terms remain overbroad for the reasons discussed above and go well beyond the narrow set of documents that Aetna Inc. agreed to produce. Plaintiffs propose dozens of entirely new search terms—covering topics such as private equity investors, board advisors, and employee hiring and termination decisions—that bear no relationship to Aetna Inc.’s use (or non-use) of Zelis’s out-of-network repricing tools.

Plaintiffs raised no objection to Aetna Inc.’s Responses and Objections for more than two months after they were served. Indeed, as recently as August 7, in advance of the last hearing, the parties filed a Joint Status Report in which Defendants stated that “Plaintiffs have raised no objections to Defendants’ custodians, custodial or noncustodial sources, or their responses and

¹⁶ Plaintiffs’ suggestion that Aetna represented it will only search for documents “that show it did not use Zelis” but not “documents that show Aetna did use Zelis” is false. Aetna’s responses and objections are clear that it will produce any such documents, and its search terms will capture any such documents.

objections to the RFPs.” Dkt. 274 at 10–11. Plaintiffs did not dispute that statement. Aetna Inc. raised this issue again on a meet and confer on August 31. Later that day—67 days after Aetna Inc. served its Responses and Objections, and well after Aetna Inc. proposed search terms tailored to those unchallenged objections—Plaintiffs raised for the first time issues with Aetna Inc.’s Responses and Objections. Those objections are not timely and the court should reject them as a reason to expand the search terms Aetna Inc. must review. By sitting on their hands for more than two months while Aetna Inc. proceeded in reliance on its unchallenged objections, Plaintiffs forfeited any right to challenge those objections now.

In any event, Plaintiffs have not moved to compel any documents from Aetna Inc. (and Aetna Inc. would oppose any such motion). Plaintiffs should not be permitted to use search-term negotiations as a backdoor mechanism to expand the scope of Aetna Inc.’s document production. Unless and until Plaintiffs do so, requiring Aetna Inc. to apply search terms beyond the scope of what it will be deeming responsive would only result in wasted time and resources.

C. Deadline for Substantial Completion of Document Productions

Plaintiffs’ Statement: As noted in the prior Joint Status Report (Dkt. 274), the current Scheduling Order (Dkt. 222) does not establish a deadline by which each party must substantially complete its production of responsive documents. At the prior Case Management Conference, the Court agreed that inclusion of such a deadline in the Scheduling Order is appropriate and said it would set such a deadline at the September Case Management Conference. Plaintiffs ask that the Court set Monday, November 16, 2026, as the deadline for the substantial completion of document production by each party. November 16 is 112 days before the close of fact discovery on March 8, 2027. This is a reasonable time period in which the parties will evaluate data and document

productions, identify Rule 30(b)(6) topics, notice and take depositions, and pursue any necessary discovery before fact-discovery closes.

Predictably, Defendants again attempt to blame Plaintiffs for their claimed inability to meet the Court's deadlines, perplexingly attributing their delay "to Plaintiffs' doubling-down on search terms." Plaintiffs do not understand this accusation because, as explained above, Plaintiffs substantially narrowed and re-worked their July 31, 2026 search terms proposal into separate, Defendant specific proposals for Defendants' convenience and at their request. If anyone has "double-downed" on search terms, it is Defendants who refused to negotiate or engage with Plaintiffs' redlines at all. Plaintiffs remain prepared to meaningfully engage in the search-term process and hope that Defendants will do the same moving forward. Monday, November 16, 2026, is an appropriate deadline for each party's to substantial completion deadline.

Defendants' Statement: As Defendants stated in the August 7 Joint Status Report, they remain amenable to a modification to the Scheduling Order that would set a deadline for the substantial completion of document productions. Unfortunately, as explained above, *see* Section B, *supra*, search term negotiations have not meaningfully progressed due to Plaintiffs' doubling-down on search terms the Court observed at the August 14 status conference "were overbroad." Status Conf. Tr. 10:12 (Aug. 14, 2026). Consequently, the parties have not been able to reach an agreement on search terms, and the timeframe for substantial completion of document productions is not yet clear.

Defendants cannot proceed with the bulk of their document review and productions until they know what search terms they will run. For that reason, Plaintiffs' resubmitted request for a November 16, 2026 deadline for substantial completion of document productions despite the delays they have caused in the meantime—allotting just nine weeks to review and produce

hundreds of thousands of documents—remains infeasible. Defendants¹⁷ are optimistic that they can meet a December 11, 2026 substantial completion deadline, which would leave approximately three months until the close of fact discovery on March 8, 2027, provided that the Court permits Defendants to proceed with the search terms they have proposed consistent with Defendants’ June 25, 2026 Responses and Objections to Plaintiffs’ Requests for Production (the “R&Os”).¹⁸

D. Defendants’ Motion to Compel and Plaintiffs’ Responses and Objections to Discovery

Defendants’ Statement: As the Court is aware, on August 31, 2026, Defendants filed their motion to compel Plaintiffs to produce documents responsive to certain requests from Defendants’ First Set of Requests for Production to Plaintiffs. On that same date, Plaintiffs served their Responses and Objections to Defendants’ First Set of Interrogatories to Plaintiffs, which do not provide any substantive answers to Defendants’ Interrogatories and instead raise multiple objections that substantially overlap with the issues raised in Defendants’ motion to compel. Defendants expect that the Court’s ruling on Defendants’ motion to compel will provide helpful guidance to the parties on the appropriate scope of other written discovery from Plaintiffs. To the extent the parties are unable to resolve their disagreements, Defendants will seek further guidance from the Court.

Plaintiffs’ Statement: It is unclear why Defendants have included this as an agenda item. Plaintiffs’ position on Defendants’ overreaching motion to compel will be stated in their opposition

¹⁷ Plaintiffs did not serve discovery requests on Meritain Health, Inc. until earlier today, September 4. Whether Meritain can meet this substantial completion deadline will depend on the reasonableness of those requests and search terms.

¹⁸ Just this week, over two months after Defendants served the R&Os, Plaintiffs for the first time delivered correspondence disputing those discovery responses and raising various scoping issues. Defendants’ above-described position and ability to meet their proposed deadline are subject to prompt and reasonable resolution of Plaintiffs’ belated pursuit of these issues.

due on September 8. Plaintiffs will be prepared to offer argument on the motion at the September 14 hearing. As Plaintiffs will explain to the Court, Defendants seek discovery on a variety of topics that myriad antitrust courts have agreed are irrelevant to the antitrust claims or any cognizable defenses, and have denied similar motions which would have improperly complicated discovery and the case generally.

Dated: September 4, 2026

Respectfully Submitted,

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Exhibit A

Search No.	Plaintiffs' 8/26/26 Proposed Revisions and Additions to Aetna's 7/1/26 Proposed Search Terms
1.	(repic! OR reimbur! OR suppress! OR discount! OR depress! <u>OR set! OR establish! OR defin! OR limit! OR fix! OR default! OR de-fault! OR "de fault!" OR initial! OR original! OR list! OR "no more than" OR "no less than" OR "more than" OR "less than" OR "higher rat!" OR "lower rat!" OR "original! pa! amount!" OR "initial! pa! amount!" OR mac OR "m.a.c." OR "max! allow! charg!" OR "max! allow! cost!" OR "max! allow! reimbur!" OR "allow! amount!" OR "amount! allow!" OR "reimburs! level!" OR "level of reimburs!"</u>) AND (zelis OR Zellis OR Zelious OR Zellious OR Zelius OR Zellius OR Zealous OR zelis.com OR "zelis.com" OR @zelis OR "@zelis" OR @zelis.com OR "Established Reimbursement" OR ERS OR "Referenced Based Pricing" OR RBP OR "Open Access Pricing" OR OAP OR established reimbursement schedule OR established reimbursement solution OR reference based pric! OR "e.r.s." OR e-r-s OR "e-r-s" OR "est! reimburs! schedul!" OR "fee schedul!" OR "est! reimburs! service!" OR "est! reimburs! sol!" OR Reference! Based Pricing OR reference-bas! pric! OR reference bas! pric! OR referenced bas! pric! OR r.b.p. OR "r.b.p." OR r-b-p OR "r-b-p")
2.	("end-to-end cost containment" OR "out of network" OR OON OR nonpar! OR out-of-network solution! <u>OR "outside the network" OR "outside of the network" OR "beyond the network" OR OOA OR "out of area" OR nonpar! OR "non-par!" OR noncontract! OR "non-contract!" OR uncontract! OR "un-contract!" OR repic! OR reimbur!</u>) AND (zelis OR Zellis OR Zelious OR Zellious OR Zelius OR Zellius OR Zealous OR zelis.com OR "zelis.com" OR @zelis OR "@zelis" OR @zelis.com OR "Established Reimbursement" OR ERS OR "Referenced Based Pricing" OR RBP OR "Open Access Pricing" OR OAP OR established reimbursement schedule OR established reimbursement solution OR reference based pric! OR "e.r.s." OR e-r-s OR "e-r-s" OR "est! reimburs! schedul!" OR "fee schedul!" OR "est! reimburs! service!" OR "est! reimburs! sol!" OR Reference! Based Pricing OR reference-bas! pric! OR reference bas! pric! OR referenced bas! pric! OR r.b.p. OR "r.b.p." OR r-b-p OR "r-b-p")
3.	(repricer! OR avality OR centene OR re-pricer! OR "third party" OR "third party pricer!" OR third-party OR "3rd party" OR "3rd party pricer!" OR "pricing agen!") AND (zelis <u>OR Zellis OR Zelious OR Zellious OR Zelius OR Zellius OR Zealous OR zelis.com OR "zelis.com" OR @zelis OR "@zelis" OR @zelis.com OR "Established Reimbursement" OR ERS OR "Referenced Based Pricing" OR RBP OR "Open Access Pricing" OR OAP OR established reimbursement schedule OR established reimbursement solution OR reference based pric! OR "e.r.s." OR e-r-s OR "e-r-s" OR "est! reimburs! schedul!" OR "fee schedul!" OR "est! reimburs! service!" OR "est! reimburs! sol!" OR Reference! Based Pricing OR reference-bas! pric! OR reference bas! pric! OR referenced bas! pric! OR r.b.p. OR "r.b.p." OR r-b-p OR "r-b-p")</u>
4.	(contract! OR agree! OR claim! OR pric! OR payment! OR rate! OR data! OR transact!) AND (zelis OR Zellis OR Zelious OR Zellious OR Zelius OR Zellius OR Zealous OR zelis.com OR "zelis.com" OR @zelis OR "@zelis" OR @zelis.com OR "Established Reimbursement" OR ERS OR "Referenced Based Pricing" OR RBP OR "Open Access Pricing" OR OAP OR established reimbursement schedule OR established reimbursement solution OR reference based pric! OR "e.r.s." OR e-r-s OR "e-r-s" OR "est! reimburs! schedul!" OR "fee schedul!" OR "est! reimburs! service!" OR "est! reimburs! sol!" OR Reference! Based Pricing OR reference-bas! pric! OR reference bas! pric! OR referenced bas! pric! OR r.b.p. OR "r.b.p." OR r-b-p OR "r-b-p") zelis
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6.	<u>(percent! OR ceiling! OR floor! OR threshold! OR "no more than") AND (zelis OR Zellis OR Zelious OR Zellious OR Zeliu OR Zellius OR Zealous OR zelis.com OR "zelis.com" OR @zelis OR "@zelis" OR @zelis.com OR "Established Reimbursement" OR ERS OR "Referenced Based Pricing" OR RBP OR "Open Access Pricing" OR OAP OR established reimbursement schedule OR established reimbursement solution OR reference based pric! OR "e.r.s." OR e-r-s OR "e-r-s" OR "est! reimburs! schedul!" OR "fee schedul!" OR "est! reimburs! service!" OR "est! reimburs! sol!" OR Reference! Based Pricing OR reference-bas! pric! OR reference bas! pric! OR referenced bas! pric! OR r.b.p. OR "r.b.p." OR r-b-p OR "r-b-p")</u>
7.	<u>("established reimbursement" OR "reference-based pric!" OR tool! OR method! OR databas! OR "fee schedule!" OR ERS OR RBP OR "Referenced Based Pricing" OR "Open Access Pricing" OR OAP OR established reimbursement schedule OR established reimbursement solution OR reference based pric! OR "e.r.s." OR e-r-s OR "e-r-s" OR "est! reimburs! schedul!" OR "fee schedul!" OR "est! reimburs! service!" OR "est! reimburs! sol!" OR Reference! Based Pricing OR reference-bas! pric! OR reference bas! pric! OR referenced bas! pric! OR r.b.p. OR "r.b.p." OR r-b-p OR "r-b-p") AND (zelis OR Zellis OR Zelious OR Zellious OR Zeliu OR Zellius OR Zealous OR zelis.com OR "zelis.com" OR @zelis OR "@zelis" OR @zelis.com)</u>
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12.	<u>(algorithm! OR methodolog! OR "artificial intelligence" OR "ai-power!" OR tool! OR method! OR tech! OR databas! OR data-bas! OR "data-bas!" OR "data bas!" OR dbas! OR d-bas! OR "d-bas!" OR schedul! OR "survey data" OR "raw data" OR "underlying data" OR "source data" OR "est! reimburs! schedul!" OR "fee schedul!" OR "est! reimburs! service!" OR "est! reimburs! sol!" OR ers OR "e.r.s." OR e-r-s OR "e-r-s" OR "reference-bas! pric!" OR "reference bas! pric!" OR "referenced-bas! pric!" OR "referenced bas! pric!" OR rbp OR r.b.p. OR "r.b.p." OR r-b-p OR "r-b-p" OR "auto! rout!" OR "a.i." OR "ai" OR "artificial! intelligen!" OR "gen! a.i." OR "gen! ai")</u>

	OR "gen-ai" OR "gen-a.i." OR "machin! learn!") AND (zelis OR zelis OR Zellis OR Zelious OR Zellious OR Zeliu OR Zellius OR Zealous OR zelis.com OR "zelis.com" OR @zelis OR "@zelis" OR @zelis.com)
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18.	(Zelis OR zelis! OR zelis.com OR Zellis OR Zelious OR Zellious OR Zeliu OR Zellius OR Zealous OR zelis.com OR @zelis OR "@zelis" OR @zelis.com OR "@zelis.com") AND (client conference! OR attend! OR attend! list! OR confirm! OR invit! OR invit! list! OR committee! OR travel! OR hotel receipt! OR restaurant receipt! OR bar! OR bar receipt! OR photo OR picture! OR reserve! OR receipt! OR yoga OR golf! OR ski! OR fish! OR swim! OR happy hour! OR happy-hour! OR cocktai! OR cock-tail! OR cock tail! OR excursion OR music! OR (magic W/10 johnson) OR comed! OR post! OR (Jason W/10 sudeikis) OR sudeikis OR conference! OR note! OR client! OR customer! OR payer! OR payor! OR transcri! OR audio! OR record! OR "audio record!" OR "video record!" OR video OR "visual record!" OR activit! OR resort! OR hotel! OR restaurant!)
19.	((pacific AND inpatient) OR pacific inpatient medical group OR ping OR p.i.m.g. OR pacific)
20.	((Frank AND Scaccia) OR scaccia)
21.	((Dennis AND Ayer) OR Ayer DDS OR ayer)

22.	<u>("ethan ciment" OR "ciment" OR "chelsea foot and ankle p.c." OR chelsea OR "chelsea foot")</u>
23.	<u>(Bachoua AND (Dan! OR chiro!)) OR ((dbc OR d.b.c. AND chiro!) OR bachoua OR dbc OR d.b.c.)</u>
24.	<u>("4 missing peace" OR "4 missing peace corps, Inc." OR "the missing peace center" OR "missing peace" OR "rhodes-levin" OR "chris laurence" OR Laurence)</u>
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26.	<u>(conspir! OR co-conspir! OR cartel! OR collu! OR coordinat! OR agree! OR align! OR antitrust! OR "anti-trust!" OR anticompet! OR "anti-compet!" OR "information shar!" OR "data shar!") AND (payer! OR payor! OR Aetna OR Cigna OR Elevance OR UnitedHealthcare OR UHG OR UHC OR UMR OR HealthScope OR Anthem OR Zelis OR repricer! OR client! OR customer! OR Humana OR UnitedHealth OR united healthcare OR u.h.g. OR u.h.c. OR uhcg OR u.h.c.g. OR "dental payer!" OR "dental payor!" OR insur! OR insurer! OR "insurance co!" OR TPA OR "t.p.a." OR "third-party administrat!" OR "third party administrat!" OR "self fund!" OR self-fund! OR meritain OR "meritain health, inc." OR "meritain health" OR "meritain health dispute resol!" OR cigna OR "the cigna group" OR "cigna group" OR "anthem blue cross of california" OR "blue cross of california" OR "blue cross" OR BCCA OR "cigna health and life ins!" OR "healthscope benefits" OR healthscope OR "health scope" OR "healthscope benefits, inc." OR "UMR, inc." OR "UMR inc")</u>
27.	<u>(role! OR responsib! OR assign! OR delegat! OR supplant! OR authori! OR capacit! OR own! OR operat! OR manag! OR supervis! OR control! OR relinquish! OR entrust! OR ced! OR agent!) AND (OON OR "out-of-network" OR "out of network" OR repric! OR "outside the network" OR "outside of the network" OR "beyond the network" OR OOA OR "out of area" OR nonpar! OR "non-par!" OR noncontract! OR "non-contract!" OR uncontract! OR "un-contract!" OR reimburs! OR "claims pricing" OR payer! OR payor! OR insurer! OR Zelis)</u>
28.	<u>(freedom! OR flex! OR choic! OR choos! OR "pa! more" OR compens! OR "pay more" OR "paid more" OR "pays more" OR "paying more" OR "increas! payment!" OR "increas! benefi!" OR "greater benefi!" OR "pa! less" OR "decreas! pa!" OR "decreas! benefi!" OR "smaller benefi!" OR "less cover!" OR "more cover!" OR "smaller rat!" OR "greater rat!" OR "decreas! rat!")</u>
29.	<u>("market rat!" OR market-rat! OR "full rat!" OR "compet! rat!" OR invoic! OR "full invoic!" OR "as invoic!" OR "as-invoic!" OR "market pric!" OR "full pric!" OR market!)</u>
30.	<u>(antitrust OR anti-trust OR "trade regulation!" OR regulat! OR handbook! OR hand-book! OR "hand book!" OR manual! OR "antitrust train!" OR "anti-trust train!" OR "antitrust guid!" OR "anti-trust guid!" OR "antitrust publi!" OR "anti-trust publi!" OR "antitrust email!" OR "anti-trust email!" OR "anti-trust e-mail!" OR "antitrust protocol!" OR "anti-trust protocol!" OR "authorit! on antitrust" OR "authorit! on anti-trust" OR "antitrust author!" OR "anti-trust author!" OR "antitrust report!" OR "anti-trust report!" OR "sherman act" OR "section one" OR "section 1" OR "sec. one" OR "sec. 1" OR "\$ one" OR "\$ 1" OR "15 u.s.c. section one" OR "15 u.s.c. section 1" OR "15 u.s.c. sec. one" OR "15 u.s.c. sec. 1" OR "15 u.s.c. § one" OR "15 u.s.c. § 1" OR "clayton act" OR "section sixteen" OR "section 16" OR "sec. sixteen" OR "sec. 16" OR "\$ 16" OR "15 u.s.c. section twenty-six" OR "15 u.s.c. section twenty six" OR "15 u.s.c. section 26" OR "15 u.s.c. sec. twenty-six" OR "15 u.s.c. sec. twenty six" OR "15 u.s.c. sec. 26" OR "15 u.s.c. § twenty-six" OR "15 u.s.c. § twenty six" OR "15 u.s.c. § 26" OR "\$ 26")</u>

31.	<u>(violat! OR antitrust! OR anti-trust OR conspir! OR coconspir! OR co-conspir! OR co conspir! OR collud! OR cartel! OR fix! OR coordinat! OR anti-compet! OR anticompet! OR compet! OR "trade regulation!" OR regulat! OR handbook! OR hand-book! OR "hand book!" OR manual! OR "antitrust train!" OR "anti-trust train!" OR "antitrust guid!" OR "anti-trust guid!" OR "sherman act" OR "section 1" OR "sec. 1" OR "15 u.s.c. § 1" OR "clayton act" OR "section 16" OR "sec. 16" OR "15 u.s.c. § 26") AND (Zelis! OR zelis.com OR ERS OR established reimbursement schedule OR established reimbursement solution OR reference based pric! OR "e.r.s." OR e-r-s OR "e-r-s" OR "est! reimburs! schedul!" OR "fee schedul!" OR "est! reimburs! service!" OR "est! reimburs! sol!" OR Reference! Based Pricing OR RBP OR reference-bas! pric! OR reference bas! pric! OR referenced bas! pric! OR r.b.p. OR "r.b.p." OR r-b-p OR "r-b-p")</u>
32.	<u>("national advantage program!" OR "nat'l advantage program!" OR "natl! advantage program!" OR nap OR n.a.p. OR "n.a.p." OR "national advantage" OR "nat'l advantage" OR "natl! advantage!" OR "nationwide advantage!" OR "administrative service agree!" OR asas OR a.s.a.s. OR "a.s.a.s." OR asa OR a.s.a. OR "a.s.a." OR "claim! pass!" OR claimpass OR claim-pass! OR "claim-pass!" OR cps OR c.p.s. OR "c.p.s." OR csps OR c.s.p.s. OR "c.s.p.s." OR "suppl network! serv!" OR "accelerat! pa!" OR "ap program!" OR "a.p. program!" OR "ap network!" OR "a.p. network!" OR "medical reimbursement analysis service!" OR "professional negotiat! serv!" OR "prof'l negotiat! serv!" OR pns OR p.n.s. OR "p.n.s." OR ppns OR p.p.n.s. OR "p.p.n.s." OR "continuous discount! agreement!" OR cda OR c.d.a. OR "c.d.a.")</u>
33.	<u>(profit! OR earning! OR "net earning!" OR incom! OR "net incom!" OR revenu! OR net revenu! OR money! OR monet! OR currenc! OR dollar! OR usd OR u.s.d. OR "u.s.d." OR "financial health!" OR "in the red" OR "in the black" OR "in the money" OR cash! OR "cash equivalent!" OR holding! OR invest! OR "short term" OR short-term OR "long term" OR long-term OR saving! OR sav! OR "earnings before income tax, depreciation!" OR ebitda OR e.b.i.t.d.a. OR "e.b.i.t.d.a." OR gaap OR g.a.a.p. OR "g.a.a.p." OR amoun! OR amt OR debt! OR credit! OR oblig! OR loan! OR facilit! OR ow! OR mortgag!) AND ("out of area" OR OOA OR NonPar! OR Non-Par! OR "outside the network" OR "outside of the network" OR "beyond the network" OR "out of network" OR "out-of-network" OR OON OR o-o-n OR "o.o.n." OR onet OR "o-net!" OR "o net!" OR "non-par!" OR non-contract! OR noncontract! OR "non contract!" OR "out-of-network sol!" OR "out of network sol!" OR "end-to-end cost contain!" OR "un contract!" OR uncontract! OR "un-contract!" OR "zelis contract!")</u>
34.	<u>(pric! OR cost! OR expen! OR amount! OR level! OR repric! OR re-pric! OR "re pric!" OR paid! OR pay! OR payment! OR satisf! OR settl! OR assur! OR discontinu! OR "executive law!" OR ceas! OR desist! OR "exclusiv! us!" OR exclusive-us! OR exclusiv! OR "five year!" OR five-year! OR "five-year!" OR "five yr!" OR five-yr! OR "five-yr!" OR "5 year!" OR 5-year! OR "5-year!" OR "5 yr!" OR 5-yr! OR "5-yr!" OR increas! OR revers! OR climb! OR "26%" OR "13%")</u>
35.	<u>("claim! pass!" OR claimpass OR claim-pass! OR "claim-pass!" OR cps OR c.p.s. OR "c.p.s." OR csps OR c.s.p.s. OR "c.s.p.s." OR "suppl network! serv!" OR "accelerat! pa!" OR "ap program!" OR "a.p. program!" OR "ap network!" OR "a.p. network!" OR "medical reimbursement analysis service!" OR "professional negotiat! serv!" OR "prof'l negotiat! serv!" OR pns OR p.n.s. OR "p.n.s." OR ppns OR p.p.n.s. OR "p.p.n.s." OR "continuous discount! agreement!" OR cda OR c.d.a. OR "c.d.a.")</u>
36.	<u>("independent database!" OR "not-for-profit compan!" OR "not for profit compan!" OR "non-profit compan!" OR "non profit compan!" OR "fair health" OR "five year!" OR five-year! OR "five yr!" OR five-yr! OR "5 year!" OR 5-year! OR "5 yr!" OR 5-yr! OR "exclus! period!" OR "exclus! term!" OR "exclus! us!" OR "fair market!" OR "reasonable and customary" OR "r and c" OR "r & c" OR "usual, customary and reasonable" OR "usual, customary, and reasonable"</u>

	<u>OR ucr OR u.c.r. OR "usual, customary & reasonable" OR "customary & reasonable" OR "customary and reasonable" OR "usual and customary" OR "usual & reasonable" OR "usual & customary" OR "market rat!")</u>
37.	<u>(500 OR "five hundred" OR five-hundred OR "five-hundred" OR 750 OR "seven hundred fifty" OR seven-hundred-fifty OR "seven-hundred-fifty" OR 770 OR "seven hundred seventy" OR seven-hundred-seventy OR "seven-hundred-seventy" OR "top 5" OR top-5 OR "top-5" OR "top five" OR top-five OR "top-five")</u>
38.	<u>(Bain OR "Bain Capital" OR Parthenon OR "Parthenon Capital" OR Mubadala OR "Mubadala Investment Company" OR HarbourVest OR HarborVest OR Guidehouse OR "Office Ally" OR "private equity" OR invest! OR loan! OR credit!) AND (Zelis OR Zellis OR Zelious OR Zellious OR Zelius OR Zellius OR Zealous OR zelis.com OR "zelis.com" OR control! OR leverag! OR steer! OR oblig! OR dictat! OR restrict!) AND ("out of area" OR OOA OR NonPar! OR Non-Par! OR "out of network" OR "outside the network" OR "outside of the network" OR "beyond the network" OR "out of network" OR "out-of-network" OR OON OR o-o-n OR "o.o.n." OR onet OR "o-net!" OR "o net!" OR "non-par!" OR non-contract! OR noncontract! OR "non contract!" OR "out-of-network sol!" OR "out of network sol!" OR "end-to-end cost contain!" OR "un contract!" OR uncontract! OR "un-contract!" OR "zelis contract!")</u>
39.	<u>(director! OR consult! OR advisor! OR adviser! OR "board member!" OR member! OR board! OR "board meet!" OR "advisor! board" OR "adviser! board" OR itenerar! OR "advisor! committee!" OR "adviser! committee!" OR "committee advis!" OR "board advisor!" OR "director! advisor!" OR "director! adviser!" OR "meet! notes" OR minute! OR veto! OR vote! OR "board consult!" OR "consult! to the board!" OR "strategic advi!") AND (Zelis OR Zellis OR Zelious OR Zellious OR Zelius OR Zellius OR Zealous OR zelis.com OR "zelis.com")</u>
40.	<u>((Ingenix OR "Fair Health" OR fairhealth OR UCR OR "usual and customary" OR "usual, customary and reasonable" OR "reasonable and customary" OR "market rat!") AND (OON OR "out-of-network" OR repric! OR reimburs! OR pric! OR rate! OR benchmark! OR databas!))</u>
41.	<u>(hate! OR dislik! OR frown! OR discourag! OR "do not like" OR don't like OR "do not want!" OR don't want! OR fair OR "not fair" OR unfair OR cancel! OR switch! OR "switch off" OR "switch away" OR "switch from" OR "transition away" OR "transition from" OR "end! use" OR "end! our use" OR "mov! away" OR nonrenew! OR non-renew! OR "not renew!" OR "provider react!" OR unsubscri! OR "un subscri!" OR "stop! subscri!") AND (Zelis! OR zelis.com OR Zellis OR Zelious OR Zellious OR Zelius OR Zellius OR Zealous OR zelis.com OR @zelis OR "@zelis" OR @zelis.com OR "@zelis.com" OR ERS OR established reimbursement schedule OR established reimbursement solution OR reference bas! pric! OR "e.r.s." OR e-r-s OR "e-r-s" OR "est! reimburs! schedul!" OR repric! OR "fee schedul!" OR "est! reimburs! service!" OR "est! reimburs! sol!" OR Reference! Based Pricing OR RBP OR reference-bas! pric! OR referenced-bas! pric! OR referenced bas! pric! OR r.b.p. OR "r.b.p." OR r-b-p OR "r-b-p")</u>
42.	<u>(exclu! OR "not accept" OR unaccept! OR "un-accept!" OR "not see" OR "not treat" OR refus! OR declin! OR cancel! OR "turn! away") AND ("out of network" OR OON OR "out of area" OR OOA OR NonPar! OR Non-Par! OR "outside the network" OR "outside of the network" OR "beyond the network" OR "out of network" OR "out-of-network" OR o-o-n OR "o.o.n." OR onet OR "o-net!" OR "o net!" OR "non-par!" OR non-contract! OR noncontract! OR "non contract!" OR "out-of-network sol!" OR "out of network sol!" OR "end-to-end cost contain!" OR "un contract!" OR uncontract! OR "un-contract!" OR "zelis contract!")</u>
43.	<u>(tool! OR method! OR tech! OR databas! OR data-bas! OR "data-bas!" OR "data bas!" OR dbas! OR d-bas! OR "d-bas!" OR schedul! OR "survey data" OR "raw data" OR "underlying data" OR "source data" OR "est! reimburs! schedul!" OR "fee schedul!" OR "est! reimburs! service!" OR</u>

	<u>"est! reimburs! sol!" OR ers OR "e.r.s." OR e-r-s OR "e-r-s" OR "reference-bas! pric!" OR "reference bas! pric!" OR "referenced-bas! pric!" OR "referenced bas! pric!" OR rbp OR r.b.p. OR "r.b.p." OR r-b-p OR "r-b-p" OR "auto! rout!" OR "a.i." OR "ai" OR "artificial! intelligen!" OR "gen! a.i." OR "gen! ai" OR "gen-ai" OR "gen-a.i." OR "machin! learn!" OR algorithm!)</u>
44.	<u>(compet! OR Aetna OR Cigna OR Elevance OR UnitedHealth OR United Health OR UHG OR payer! OR payor! OR "dental payer!" OR "dental payor!" OR insur! OR "insurance co!" OR TPA OR "t.p.a." OR "third-party administrat!" OR "third party administrat!" OR "self fund!" OR self-fund! OR zelis OR zelis.com OR meritain OR "meritain health, inc." OR "meritain health" OR "meritain health dispute resol!" OR "the cigna group" OR "cigna group" OR humana OR united! OR "united health" OR unitedhealthgroup OR "unitedhealth group" OR "united healthgroup" OR "united healthcare" OR unitedhealthcare OR "u.h.g." OR UHC OR "u.h.c." OR UHCG OR "u.h.c.g." OR "anthem blue cross of california" OR anthem OR "blue cross of california" OR "blue cross" OR BCCA OR "cigna health and life ins!" OR "healthscope benefits" OR healthscope OR "health scope" OR "healthscope benefits, inc." OR "UMR, inc." OR "UMR inc" OR UMR) AND (Zelis OR Zellis OR Zelious OR Zelliious OR Zeliu OR Zellius OR Zealous OR zelis.com OR "zelis.com" OR @zelis OR "@zelis" OR @zelis.com OR "@zelis.com") AND (terminat! OR fire OR fired OR firing OR disciplin! OR suspen! OR reprimand! OR violat! OR review! OR eval! OR assess! OR hir! OR promot! OR demot! OR resign! OR incentiv! OR rais!)</u>
45.	<u>(compet! OR Aetna OR Cigna OR Elevance OR UnitedHealth OR United Health OR payer! OR payor! OR "dental payer!" OR "dental payor!" OR insur! OR "insurance co!" OR TPA OR "t.p.a." OR "third-party administrat!" OR "third party administrat!" OR "self fund!" OR self-fund! OR zelis OR zelis.com OR meritain OR "meritain health, inc." OR "meritain health" OR "meritain health dispute resol!" OR "the cigna group" OR "cigna group" OR humana OR united! OR "united health" OR unitedhealthgroup OR "unitedhealth group" OR "united healthgroup" OR "united healthcare" OR unitedhealthcare OR UHG OR "u.h.g." OR UHC OR "u.h.c." OR UHCG OR "u.h.c.g." OR "anthem blue cross of california" OR anthem OR "blue cross of california" OR "blue cross" OR BCCA OR "cigna health and life ins!" OR "healthscope benefits" OR healthscope OR "health scope" OR "healthscope benefits, inc." OR "UMR, inc." OR "UMR inc" OR UMR) AND ("out of network" OR OON OR out of area OR OOA OR NonPar! OR Non-Par! OR "outside the network" OR "outside of the network" OR "beyond the network" OR "out of network" OR "out-of-network" OR o-o-n OR "o.o.n." OR onet OR "o-net!" OR "o net!" OR "non-par!" OR non-contract! OR noncontract! OR "non contract!" OR "out-of-network sol!" OR "out of network sol!" OR "end-to-end cost contain!" OR "un contract!" OR uncontract! OR "un-contract!" OR "zelis contract!") AND (terminat! OR fire OR fired OR firing OR disciplin! OR suspen! OR reprimand! OR violat! OR review! OR eval! OR assess! OR hir! OR promot! OR demot! OR resign! OR incentiv! OR rais!)</u>
46.	<u>(DeSantis Breindel OR desantisbreindel OR desantisbreindel@ OR "desantisbreindel@" OR desantis OR breindel OR "de santis breindel" OR "de santis" OR Availity OR availity OR avail! OR AHIP OR America! Health Insurance Plan! OR a.h.i.p. OR "a.h.i.p." OR "america's health insurance plan!" OR "american health insurance plan!" OR "america! health ins! plan!") AND (Out of Network! OR OON OR Noncontract! OR Non contract! OR Uncontract! OR Un contract! OR Nonnegotiat! OR Non-negotiat! OR "outside the network" OR "outside of the network" OR "beyond the network" OR "out-of-network" OR o-o-n OR "o.o.n." OR onet OR "o-net!" OR "o net!" OR NonPar! OR "non-par!" OR non-contract! OR "non contract!" OR "out-of-network sol!" OR "out of network sol!" OR "end-to-end cost contain!" OR "un-contract!" OR "zelis contract!")</u>
47.	<u>("user group!" OR "user advisory group!" OR "focus group" OR "test group" OR "test" OR "survey" OR "poll") AND (Zelis OR "Established Reimbursement" OR ERS OR "Referenced</u>

	<u>Based Pricing" OR RBP OR "Open Access Pricing" OR OAP OR "Price Map" OR "Intelligent Pricing" OR ZIPP OR QuickReprice OR established reimbursement schedule OR established reimbursement solution OR reference based pric! OR "e.r.s." OR e-r-s OR "e-r-s" OR "est! reimburs! schedul!" OR "fee schedul!" OR "est! reimburs! service!" OR "est! reimburs! sol!" OR Reference! Based Pricing OR reference-bas! pric! OR reference bas! pric! OR referenced bas! pric! OR r.b.p. OR "r.b.p." OR r-b-p OR "r-b-p")</u>
48.	<u>(pa! OR contract! OR sensitiv! OR "competitively sensitive" OR competitively-sensitive OR "commercially sensitive" OR commercially-sensitive OR csi! OR c.s.i. OR "c.s.i." OR c-s-i! OR "c-s-i" OR priv! OR confid! OR proprietar! OR claim! OR pric! OR sav! OR expen! OR cost! OR information! OR info! OR data! OR datum!)</u>
49.	<u>(shar! OR distribut! OR contract! OR agree! OR exchang! OR upload! OR up-load! OR "up load!" OR download! OR down-load! OR " down load!" OR sen! OR transfer! OR deliver! OR ftp! OR f.t.p. OR protocol! OR portal! OR compat! OR scoop! OR bulk! OR load!) AND (pa! OR contract! OR sensitiv! OR "competitively sensitive" OR competitively-sensitive OR "commercially sensitive" OR commercially-sensitive OR csi! OR c.s.i. OR "c.s.i." OR c-s-i! OR "c-s-i" OR priv! OR confid! OR proprietar! OR claim! OR pric! OR sav! OR expen! OR cost! OR information! OR info! OR data! OR datum!)</u>
50.	<u>(payer! OR payor! OR Aetna OR Cigna OR Elevance OR UnitedHealthcare OR UHG OR UHC OR UMR OR HealthScope OR Anthem OR Zelis OR repricer! OR client! OR customer! OR Humana OR UnitedHealth OR united healthcare OR u.h.g. OR u.h.c. OR uhcg OR u.h.c.g. OR "dental payer!" OR "dental payor!" OR insur! OR insurer! OR "insurance co!" OR TPA OR "t.p.a." OR "third-party administrat!" OR "third party administrat!" OR "self fund!" OR self-fund! OR meritain OR "meritain health, inc." OR "meritain health" OR "meritain health dispute resol!" OR cigna OR "the cigna group" OR "cigna group" OR "anthem blue cross of california" OR "blue cross of california" OR "blue cross" OR BCCA OR "cigna health and life ins!" OR "healthscope benefits" OR healthscope OR "health scope" OR "healthscope benefits, inc." OR "UMR, inc." OR "UMR inc") AND (zelis OR Zellis OR Zelious OR Zellious OR Zelius OR Zellius OR Zealous OR zelis.com OR "zelis.com" OR @zelis OR "@zelis" OR @zelis.com OR "Established Reimbursement" OR ERS OR "Referenced Based Pricing" OR RBP OR "Open Access Pricing" OR OAP OR established reimbursement schedule OR established reimbursement solution OR reference based pric! OR "e.r.s." OR e-r-s OR "e-r-s" OR "est! reimburs! schedul!" OR "fee schedul!" OR "est! reimburs! service!" OR "est! reimburs! sol!" OR Reference! Based Pricing OR reference-bas! pric! OR reference bas! pric! OR referenced bas! pric! OR r.b.p. OR "r.b.p." OR r-b-p OR "r-b-p")</u>

Exhibit B



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July 1, 2026

Via Electronic Mail

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RE: *In re Zelis Repricing Antitrust Litig.*, No. 1:25-cv-10734-BEM (D. Mass.)

Counsel:

Pursuant to Section V.E. of the preliminary Stipulated Order Regarding Production of Electronically Stored Information and Paper Documents (hereinafter "Draft ESI Order"), Defendant Elevance Health, Inc. ("Elevance") hereby provides the following disclosures.

Elevance currently intends to utilize search terms as the primary culling methodology. The selection process for documents to which search terms will be applied is primarily focused on collecting custodial email mailboxes based upon the date scope negotiated and agreed-to by the Parties. Definitions and guidance regarding non-email collections, including non-custodial data sources, will be established through counsel's investigation in consultation with custodians and other relevant stakeholders.

July 1, 2026
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Elevance's proposed search terms are provided in the attached chart and remain subject to modification as a result of Elevance's ongoing investigations and search term testing as well as meet-and-confer discussions between the Parties. If documents that typically contain insufficient text are specifically collected for production, they may be reviewed for relevance without the application of search terms.

Elevance uses Relativity (version 25.0.538.3-update.0.3) with a customized stop word list for this case, referenced in the attached chart. The dtSearch engine supports advanced searches such as proximity, stemming, Boolean operators, and custom noise word lists, along with standard keyword search features.

Sincerely,

A handwritten signature in black ink, appearing to read "Bradley D. Barringer". The signature is fluid and cursive, with the first name "Bradley" and last name "Barringer" clearly distinguishable.

Bradley D. Barringer

EXHIBIT 1

Search No.	Plaintiffs' 8/24/26 Revisions and Additions to United's 7/1/26 Proposed Search Terms
1.	(meet* OR confer* OR consult* OR appointment* OR invit* OR zoom* OR videoconference OR agenda* OR program* OR schedule* OR plan* OR outline* OR itinerary OR travel* OR note* OR minute* OR transcri* OR present*) AND (Zelis OR zelis.com OR Zellis OR Zelious OR Zellious OR Zeliu OR Zellius OR Zealous)
2.	(Zelis OR "Established Reimbursement Schedule" OR "ERS" OR "Reference-Based Pricing" OR "RBP" OR "Fair Health" OR "FAIRHealth" OR Zellis OR Zelious OR Zellious OR Zeliu OR Zellius OR Zealous OR "zelis.com" OR Established Reimbursement Solution OR ERS OR e.r.s. OR e-r-s OR "est* reimburs* schedul*" OR "fee schedul*" OR "est* reimburs* service*" OR "est* reimburs* sol*" OR Reference* Based Pricing OR RBP OR reference-bas* pric* OR reference bas* pric* OR referenced-bas* pric* OR referenced bas* pric* OR r.b.p. OR r-b-p OR fair-health OR non-profit* OR "non profit*" OR not-for-profit* OR "not for profit*" OR reprec* OR re-pric* OR IPR OR OPR OR reimbur* OR fix* OR set* OR default* OR de-fault* OR initial* OR original* OR list* OR limit* OR suppress* OR align* OR curtail* OR pric* OR reduc* OR down* OR low* OR depress* OR decreas* OR flat* OR consist* OR custom* OR defensib* OR discount* OR "fair rate*" OR overpa* OR "over-pa*" OR underpa* OR "capture sav*" OR "market-bas*" OR "market bas*" OR "market-based pric*" OR propriet* OR "nonarbitrary*" OR "non-arbitrar*" OR "pre-defin*") AND (Aetna OR (Blue AND w/3 Shield) OR BCBS OR Cigna OR Elevance OR Humana OR compet* OR payer* OR payor* OR "dental payer*" OR "dental payor*" OR insur* OR insurer* OR "insurance co*" OR TPA OR "t.p.a." OR "third-party administrat*" OR "third party administrat*" OR "self fund*" OR self-fund* OR UnitedHealth OR UHG OR united* OR unitedhealthgroup OR "united healthcare" OR UHC OR UHCG OR "anthem blue cross of california" OR anthem OR "blue cross of california" OR "blue cross" OR BCCA OR "cigna health and life ins*" OR "healthscope benefits" OR healthscope OR "UMR, inc." OR "UMR inc" OR UMR) AND ("OON" OR "out of network" OR "out-of-network" OR "non-par*" OR nonpar* OR out of area OR OOA OR "outside the network" OR "outside of the network" OR "beyond the network" OR OON OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR non-contract* OR noncontract* OR "out-of-network sol*" OR "out of network sol*" OR "end-to-end cost contain*" OR "un contract*" OR "un-contract*" OR "zelis contract*")
3.	(Zelis OR "Established Reimbursement Schedule" OR "ERS" OR "Reference-Based Pricing" OR "Reference Based Pricing" OR "RBP" OR Zellis OR Zelious OR Zellious OR Zeliu OR Zellius OR Zealous OR "zelis.com" OR Established Reimbursement Solution OR ERS OR e.r.s. OR e-r-s OR "est* reimburs* schedul*" OR "fee schedul*" OR "est* reimburs* service*" OR "est* reimburs* sol*" OR Reference* Based Pricing OR RBP OR reference-bas* pric* OR reference bas* pric* OR referenced-bas* pric* OR referenced bas* pric* OR r.b.p. OR r-b-p OR reprec* OR re-pric* OR IPR OR OPR OR reimbur* OR fix* OR set* OR default* OR de-fault* OR initial* OR original* OR list* OR limit* OR suppress* OR align* OR curtail* OR pric* OR reduc* OR down* OR low* OR depress* OR decreas* OR flat* OR consist* OR custom* OR defensib* OR discount* OR "fair rate*" OR overpa* OR "over-pa*" OR underpa* OR "capture sav*" OR "market-bas*" OR "market bas*" OR "market-based pric*" OR propriet* OR "nonarbitrary*" OR "non-arbitrar*" OR "pre-defin*") AND (pitch OR "request for proposal" OR proposal)
4.	((analy* OR research) AND w/5 (market OR competit* OR trend* OR "market rat*" OR market-rat* OR "full rat*" OR "compet* rat*" OR invoic* OR "full invoic*" OR "as invoic*" OR "as-invoic*" OR "market pric*" OR "full pric*" OR market*")) w/10 AND ("OON" OR "ONET" OR "out-of-network" OR "out of network" OR out of area OR OOA OR NonPar* OR Non-Par* OR "outside the network" OR "outside of the network" OR "beyond the network" OR OON OR o-o-n OR "o.o.n." OR "o-net*" OR

Search No.	Plaintiffs' 8/24/26 Revisions and Additions to United's 7/1/26 Proposed Search Terms
	<u>"o net*" OR non-contract* OR noncontract* OR "out-of-network sol*" OR "out of network sol*" OR "end-to-end cost contain*" OR "un contract*" OR "un-contract*" OR "zelis contract*")</u>
5.	(competit* w/10 <u>AND</u> (position* OR advantage* OR disadvantage* OR compar* OR differentiat* OR value OR opportunit*)) OR ((market OR industry OR field <u>OR "market rat*" OR market-rat* OR "full rat*" OR "compet* rat*" OR "invoice*" OR "full invoice*" OR "as invoic*" OR "as-invoic*" OR "market pric*" OR "full pric*" OR market*)</u> AND w/3 (share OR percent*)) OR ((perform* OR trend* OR grow* OR shrink* OR reduc* OR lose OR losing OR loss*) w/10-competit*)
6.	(report* OR presentation*) AND ("Zelis" OR "Established Reimbursement Schedule" OR "ERS" OR "Reference-Based Pricing" OR "Reference Based Pricing" OR "RBP" <u>OR Zellis OR Zelious OR Zellious OR Zelius OR Zelliis OR Zealous OR "zelis.com" OR Established Reimbursement Solution OR ERS OR e.r.s. OR e-r-s OR "est* reimburs* schedul*" OR "fee schedul*" OR "est* reimburs* service*" OR "est* reimburs* sol*" OR Reference* Based Pricing OR RBP OR reference-bas* pric* OR reference bas* pric* OR referenced-bas* pric* OR referenced bas* pric* OR r.b.p. OR r-b-p OR reprec* OR re-pric* OR IPR OR OPR OR reimburs* OR fix* OR set* OR default* OR de-fault* OR initial* OR original* OR list* OR limit* OR suppress* OR align* OR curtail* OR pric* OR reduc* OR down* OR low* OR depress* OR decreas* OR flat* OR consist* OR custom* OR defensib* OR discount* OR "fair rate*" OR overpa* OR "over-pa*" OR underpa* OR "capture sav*" OR "market-bas*" OR "market bas*" OR "market-based pric*" OR propriet* OR "nonarbitrary*" OR "non-arbitrar*" OR "pre-defin*") w/20<u>AND</u> ((competitive AND w/3 position) OR "market share" OR (perform* AND w/3 competitor*) OR marketshare* OR "geograph* adjust*" OR "geograph* scop*" OR "geograph* reach*" OR "geograph* area*" OR "geograph* market*")</u>
7.	(acquir* OR develop* OR deploy* OR implement*) AND w/2 (("out of network" OR "OON" OR nonpar OR "non par" <u>OR out of area OR OOA OR NonPar* OR Non-Par* OR "outside the network" OR "outside of the network" OR "beyond the network" OR OON OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR non-contract* OR noncontract* OR "out-of-network sol*" OR "out of network sol*" OR "end-to-end cost contain*" OR "un contract*" OR "un-contract*" OR "zelis contract*")</u> AND w/1 (tool OR program*))
8.	(analy* OR research OR report*) AND ((("out of network" OR "OON" <u>OR out of area OR OOA OR NonPar* OR Non-Par* OR "outside the network" OR "outside of the network" OR "beyond the network" OR OON OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR non-contract* OR noncontract* OR "out-of-network sol*" OR "out of network sol*" OR "end-to-end cost contain*" OR "un contract*" OR "un-contract*" OR "zelis contract*")</u> AND w/1 program*) w/10 <u>AND</u> ("Zelis" OR "Established Reimbursement Schedule" OR "ERS" OR "Reference-Based Pricing" OR "Reference Based Pricing" OR "RBP" <u>OR Zellis OR Zelious OR Zellious OR Zelius OR Zelliis OR Zealous OR "zelis.com" OR Established Reimbursement Solution OR ERS OR e.r.s. OR e-r-s OR "est* reimburs* schedul*" OR "fee schedul*" OR "est* reimburs* service*" OR "est* reimburs* sol*" OR Reference* Based Pricing OR RBP OR reference-bas* pric* OR reference bas* pric* OR referenced-bas* pric* OR referenced bas* pric* OR r.b.p. OR r-b-p OR reprec* OR re-pric* OR IPR OR OPR OR reimburs* OR fix* OR set* OR default* OR de-fault* OR initial* OR original* OR list* OR limit* OR suppress* OR align* OR curtail* OR pric* OR reduc* OR down* OR low* OR depress* OR decreas* OR flat* OR consist* OR custom* OR defensib* OR discount* OR "fair rate*" OR overpa* OR "over-pa*" OR underpa* OR "capture sav*" OR "market-bas*" OR "market bas*" OR "market-based pric*" OR propriet* OR "nonarbitrary*" OR "non-arbitrar*" OR "pre-defin*")</u>

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9.	((manual* OR guideline* OR polic* OR procedur*) w/10AND ("out of network" OR "OON" OR out of area OR OOA OR NonPar* OR Non-Par* OR "outside the network" OR "outside of the network" OR "beyond the network" OR OON OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR non-contract* OR noncontract* OR "out-of-network sol*" OR "out of network sol*" OR "end-to-end cost contain*" OR "un contract*" OR "un-contract*" OR "zelis contract*")) AND w/1 program*)) AND w/5 (Zelis OR "Established Reimbursement Schedule" OR "ERS" OR "Reference-Based Pricing" OR "Reference Based Pricing" OR "RBP" OR Zellis OR Zelious OR Zellious OR Zelius OR Zellius OR Zealous OR "zelis.com" OR Established Reimbursement Solution OR ERS OR e.r.s. OR e-r-s OR "est* reimburs* schedul*" OR "fee schedul*" OR "est* reimburs* service*" OR "est* reimburs* sol*" OR Reference* Based Pricing OR RBP OR reference-bas* pric* OR reference bas* pric* OR referenced-bas* pric* OR referenced bas* pric* OR r.b.p. OR r-b-p OR reprec* OR re-pric* OR IPR OR OPR OR reimbur* OR fix* OR set* OR default* OR de-fault* OR initial* OR original* OR list* OR limit* OR suppress* OR align* OR curtail* OR pric* OR reduc* OR down* OR low* OR depress* OR decreas* OR flat* OR consist* OR custom* OR defensib* OR discount* OR "fair rate*" OR overpa* OR "over-pa*" OR underpa* OR "capture sav*" OR "market-bas*" OR "market bas*" OR "market-based pric*" OR propriet* OR "nonarbitrary*" OR "non-arbitrar*" OR "pre-defin*"))
10.	((report* OR presentation* OR guideline* OR polic* OR procedur*) w/20AND (Zelis OR "Established Reimbursement Schedule" OR "ERS" OR "Reference-Based Pricing" OR "Reference Based Pricing" OR "RBP" OR Zellis OR Zelious OR Zellious OR Zelius OR Zellius OR Zealous OR "zelis.com" OR Established Reimbursement Solution OR ERS OR e.r.s. OR e-r-s OR "est* reimburs* schedul*" OR "fee schedul*" OR "est* reimburs* service*" OR "est* reimburs* sol*" OR Reference* Based Pricing OR RBP OR reference-bas* pric* OR reference bas* pric* OR referenced-bas* pric* OR referenced bas* pric* OR r.b.p. OR r-b-p OR reprec* OR re-pric* OR IPR OR OPR OR reimbur* OR fix* OR set* OR default* OR de-fault* OR initial* OR original* OR list* OR limit* OR suppress* OR align* OR curtail* OR pric* OR reduc* OR down* OR low* OR depress* OR decreas* OR flat* OR consist* OR custom* OR defensib* OR discount* OR "fair rate*" OR overpa* OR "over-pa*" OR underpa* OR "capture sav*" OR "market-bas*" OR "market bas*" OR "market-based pric*" OR propriet* OR "nonarbitrary*" OR "non-arbitrar*" OR "pre-defin*")) w/20AND (balance AND w/3 bill*))
11.	((member w/10AND (protect* OR harmless)) w/15AND ("balance bill*" OR "surprise bill*" OR "balance* bill*" OR "bal* bill*" OR "bill* the bal*" OR "balance* bill* navigat*" OR "gap bill*" OR "gap* invoic*" OR "deficien* claim" OR "claim deficien*" OR "bill* differen*" OR "differen* in invoic*")) w/10AND (Zelis OR "Established Reimbursement Schedule" OR "ERS" OR "Reference-Based Pricing" OR "Reference Based Pricing" OR "RBP" OR Zellis OR Zelious OR Zellious OR Zelius OR Zellius OR Zealous OR "zelis.com" OR Established Reimbursement Solution OR ERS OR e.r.s. OR e-r-s OR "est* reimburs* schedul*" OR "fee schedul*" OR "est* reimburs* service*" OR "est* reimburs* sol*" OR Reference* Based Pricing OR RBP OR reference-bas* pric* OR reference bas* pric* OR referenced-bas* pric* OR referenced bas* pric* OR r.b.p. OR r-b-p OR reprec* OR re-pric* OR IPR OR OPR OR reimbur* OR fix* OR set* OR default* OR de-fault* OR initial* OR original* OR list* OR limit* OR suppress* OR align* OR curtail* OR pric* OR reduc* OR down* OR low* OR depress* OR decreas* OR flat* OR consist* OR custom* OR defensib* OR discount* OR "fair rate*" OR overpa* OR "over-pa*" OR underpa* OR "capture sav*" OR "market-bas*" OR "market bas*" OR "market-based pric*" OR propriet* OR "nonarbitrary*" OR "non-arbitrar*" OR "pre-defin*"))

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12.	((Zelis OR "Established Reimbursement Schedule" OR "ERS" OR "Reference-Based Pricing" OR "Reference Based Pricing" OR "RBP" OR balance bill* OR surprise bill* OR Zellis OR Zelious OR Zellious OR Zelius OR Zellius OR Zealous OR "zelis.com" OR Established Reimbursement Solution OR ERS OR e.r.s. OR e-r-s OR "est* reimburs* schedul*" OR "fee schedul*" OR "est* reimburs* service*" OR "est* reimburs* sol*" OR Reference* Based Pricing OR RBP OR reference-bas* pric* OR reference bas* pric* OR referenced-bas* pric* OR referenced bas* pric* OR r.b.p. OR r-b-p OR "balance* bill*" OR "bal* bill*" OR "bill* the bal*" OR "balance* bill* navigat*" OR "gap bill*" OR "gap* invoic*" OR "deficien* claim" OR "claim deficien*" OR "bill* differen*" OR "differen* in invoic*" OR reprec* OR re-pric* OR IPR OR OPR OR reimbur* OR fix* OR set* OR default* OR de-fault* OR initial* OR original* OR list* OR limit* OR suppress* OR align* OR curtail* OR pric* OR reduc* OR down* OR low* OR depress* OR decreas* OR flat* OR consist* OR custom* OR defensib* OR discount* OR "fair rate*" OR overpa* OR "over-pa*" OR underpa* OR "capture sav*" OR "market-bas*" OR "market bas*" OR "market-based pric*" OR propriet* OR "nonarbitrary*" OR "non-arbitrar*" OR "pre-defin*") w/10AND (complain* OR concern* OR question*)) w/10AND (pric* OR cost* OR access*)
13.	(Zelis OR zelis.com OR Zellis OR Zelious OR Zellious OR Zelius OR Zellius OR Zealous) AND ((performance AND w/1 report*) OR (appeal* AND w/1 report*) OR "utilization report*" OR "governance report*")
14.	((Zelis OR zelis.com OR Zellis OR Zelious OR Zellious OR Zelius OR Zellius OR Zealous) w/30 AND ("Established Reimbursement Schedule" OR "ERS" OR "Reference-Based Pricing" OR "Reference Based Pricing" OR "RBP" OR Established Reimbursement Solution OR ERS OR e.r.s. OR e-r-s OR "est* reimburs* schedul*" OR "fee schedul*" OR "est* reimburs* service*" OR "est* reimburs* sol*" OR Reference* Based Pricing OR RBP OR reference-bas* pric* OR reference bas* pric* OR referenced-bas* pric* OR referenced bas* pric* OR r.b.p. OR r-b-p)) AND (pay* OR price* OR negotiat* OR advocate* OR advocacy OR dispute* OR "balance bill" OR appeal* OR "balance* bill*" OR "bal* bill*" OR "bill* the bal*" OR "balance* bill* navigat*" OR "gap bill*" OR "gap* invoic*" OR "deficien* claim" OR "claim deficien*" OR "bill* differen*" OR "differen* in invoic*" OR reprec* OR re-pric* OR IPR OR OPR OR reimbur* OR fix* OR set* OR default* OR de-fault* OR initial* OR original* OR list* OR limit* OR suppress* OR align* OR curtail* OR pric* OR reduc* OR down* OR low* OR depress* OR decreas* OR flat* OR consist* OR custom* OR defensib* OR discount* OR "fair rate*" OR overpa* OR "over-pa*" OR underpa* OR "capture sav*" OR "market-bas*" OR "market bas*" OR "market-based pric*" OR propriet* OR "nonarbitrary*" OR "non-arbitrar*" OR "pre-defin*")
15.	(Zelis OR "Established Reimbursement Schedule" OR "ERS" OR "Reference-Based Pricing" OR "Reference Based Pricing" OR "RBP" OR Zellis OR Zelious OR Zellious OR Zelius OR Zellius OR Zealous OR "zelis.com" OR Established Reimbursement Solution OR ERS OR e.r.s. OR e-r-s OR "est* reimburs* schedul*" OR "fee schedul*" OR "est* reimburs* service*" OR "est* reimburs* sol*" OR Reference* Based Pricing OR RBP OR reference-bas* pric* OR reference bas* pric* OR referenced-bas* pric* OR referenced bas* pric* OR r.b.p. OR r-b-p OR reprec* OR re-pric* OR IPR OR OPR OR reimbur* OR fix* OR set* OR default* OR de-fault* OR initial* OR original* OR list* OR limit* OR suppress* OR align* OR curtail* OR pric* OR reduc* OR down* OR low* OR depress* OR decreas* OR flat* OR consist* OR custom* OR defensib* OR discount* OR "fair rate*" OR overpa* OR "over-pa*" OR underpa* OR "capture sav*" OR "market-bas*" OR "market bas*" OR "market-based pric*" OR propriet* OR "nonarbitrary*" OR "non-arbitrar*" OR "pre-defin*") w/10AND

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	(benchmark* OR overrid* OR ceiling* OR floor* OR "cap" OR "caps" OR threshold* OR percent* OR pct* OR % OR amount* OR cap* OR threshold* OR cliff* OR limit* OR fix* OR set* OR default*)
16.	(((("out of network" OR "OON" OR out of area OR OOA OR NonPar* OR Non-Par* OR "outside the network" OR "outside of the network" OR "beyond the network" OR OON OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR non-contract* OR noncontract* OR "out-of-network sol*" OR "out of network sol*" OR "end-to-end cost contain*" OR "un contract*" OR "un-contract*" OR "zelis contract*") AND w/1 program*) w/10 AND (receive* OR recover* OR reimburse*)) AND ((receive* OR recover* OR reimburse*) w/10 AND ("Established Reimbursement Schedule" OR "ERS" OR "Reference-Based Pricing" OR "RBP" OR ("Established Reimbursement Schedule" OR "ERS" OR "Reference-Based Pricing" OR "Reference Based Pricing" OR "RBP" w/10 AND (fee* OR revenue* OR income OR "IOI" OR earnings OR profit* OR budget*) OR Established Reimbursement Solution OR ERS OR e.r.s. OR e-r-s OR "est* reimburs* schedul*" OR "fee schedul*" OR "est* reimburs* service*" OR "est* reimburs* sol*" OR Reference* Based Pricing OR RBP OR reference-bas* pric* OR reference bas* pric* OR referenced-bas* pric* OR referenced bas* pric* OR r.b.p. OR r-b-p OR reprec* OR re-pric* OR IPR OR OPR OR reimbur* OR fix* OR set* OR default* OR de-fault* OR initial* OR original* OR list* OR limit* OR suppress* OR align* OR curtail* OR pric* OR reduc* OR down* OR low* OR depress* OR decreas* OR flat* OR consist* OR custom* OR defensib* OR discount* OR "fair rate*" OR overpa* OR "over-pa*" OR underpa* OR "capture sav*" OR "market-bas*" OR "market bas*" OR "market-based pric*" OR propriet* OR "nonarbitrary*" OR "non-arbitrar*" OR "pre-defin*"))))
17.	((consider* OR analy* OR evaluat* OR review* OR assess* OR "cost-benefit" OR "cost benefit") w/25 AND ("ending use" OR "end use" OR "end our use" OR "exit" OR "switch away" OR "switch off" OR "move away" OR "transition away" OR hat* OR dislik* OR frown* OR discourag* OR "do not like" OR "don't like" OR "do not want*" OR "don't want*" OR unfair OR switch* OR "switch from" OR "transition from" OR jettison* OR abandon* OR relinquish* OR drop*) w/25 AND (Zelis OR "Established Reimbursement Schedule" OR "ERS" OR "Reference-Based Pricing" OR "Reference Based Pricing" OR "RBP" OR Zellis OR Zelious OR Zellious OR Zelius OR Zellius OR Zealous OR "zelis.com" OR Established Reimbursement Solution OR ERS OR e.r.s. OR e-r-s OR "est* reimburs* schedul*" OR "fee schedul*" OR "est* reimburs* service*" OR "est* reimburs* sol*" OR Reference* Based Pricing OR RBP OR reference-bas* pric* OR reference bas* pric* OR referenced-bas* pric* OR referenced bas* pric* OR r.b.p. OR r-b-p OR reprec* OR re-pric* OR IPR OR OPR OR reimbur* OR fix* OR set* OR default* OR de-fault* OR initial* OR original* OR list* OR limit* OR suppress* OR align* OR curtail* OR pric* OR reduc* OR down* OR low* OR depress* OR decreas* OR flat* OR consist* OR custom* OR defensib* OR discount* OR "fair rate*" OR overpa* OR "over-pa*" OR underpa* OR "capture sav*" OR "market-bas*" OR "market bas*" OR "market-based pric*" OR propriet* OR "nonarbitrary*" OR "non-arbitrar*" OR "pre-defin*")))
18.	(("Zelis" OR Zellis OR Zelious OR Zellious OR Zelius OR Zellius OR Zealous OR "zelis.com") AND w/5 (agreement or contract OR contract* OR s.o.w. OR "sow*" OR "statement* of work*" OR "stmt* of work*" OR amend* OR "side letter*" OR "side-letter*" OR agree* OR MOU OR m.o.u. OR MOA OR m.o.a. OR LOI OR l.o.i. OR LOA OR l.o.a.) w/15 AND (terminate* OR expir* OR nonrenew* OR "non-renew*" OR cancel* OR renegotiat* OR "notice of termination" OR hat* OR dislik* OR frown* OR discourag* OR "do not like" OR "don't like" OR "do not want*" OR "don't want*" OR unfair OR switch* OR "switch from" OR "transition from" OR jettison* OR abandon* OR relinquish* OR drop*)))

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19.	((inquiry OR investigat* OR probe OR audit OR review OR examination OR inspection OR "internal review" OR "external review" OR "regulatory request" OR "regulatory inquiry" OR "regulatory investigation" OR litigation) w/25AND (violation* OR antitrust OR "anti-trust" OR "competition law" OR "Sherman Act" OR "Clayton Act" OR "Cartwright Act" OR <u>OR "15 U.S.C. § 1" OR "15 U.S.C. § 26" OR "state antitrust" OR "federal antitrust" OR collud* OR "price fix*" OR "restraint of trade" OR conspir* OR co-conspir* OR "co conspir*" OR cartel* OR agree* OR collu* OR manipul* OR influen* OR coordinat* OR "absence of compet*" OR "absent compet*" OR "no longer compet*" OR "avoid compet*" OR "lack of compet*" OR "lessened compet*" OR violat* OR antitrust* OR "anti-trust*" OR "anti-compet*" OR anticompet* OR repric* OR re-prec* OR IPR OR OPR OR reimburs* OR set* OR default* OR de-fault* OR initial* OR original* OR list* OR limit* OR suppress* OR align* OR curtail* OR pric* OR reduc* OR down* OR low* OR depress* OR decreas* OR flat* OR consist* OR custom* OR defensib* OR discount* OR "fair rate*" OR overpa* OR "over-pa*" OR underpa* OR "capture sav*" OR "market-bas*" OR "market bas*" OR "market-based pric*" OR propriet* OR "nonarbitrary*" OR "non-arbitrar*" OR "pre-defin*")) w/25AND ("OON pricing" OR "out-of-network pricing" OR "OON repricing" OR "out-of-network repricing" OR Zelis OR "Established Reimbursement Schedule" OR "ERS" OR "Reference-Based Pricing" OR "Reference Based Pricing" OR "RBP" <u>OR Zellis OR Zelious OR Zellious OR Zelius OR Zellius OR Zealous OR "zelis.com" OR out of area OR OOA OR NonPar* OR Non-Par* OR "outside the network" OR "outside of the network" OR "beyond the network" OR OON OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR non-contract* OR noncontract* OR "out-of-network sol*" OR "out of network sol*" OR "end-to-end cost contain*" OR "un contract*" OR "un-contract*" OR "zelis contract*" OR Established Reimbursement Solution OR ERS OR e.r.s. OR e-r-s OR "est* reimburs* schedul*" OR "fee schedul*" OR "est* reimburs* service*" OR "est* reimburs* sol*" OR Reference* Based Pricing OR RBP OR reference-bas* pric* OR reference bas* pric* OR referenced-bas* pric* OR referenced bas* pric* OR r.b.p. OR r-b-p)</u></u>
20.	(terminat* OR "notice of termination" OR "termination notice" OR "non-renewal" OR nonrenew* OR hat* OR dislik* OR frown* OR discourag* OR "do not like" OR "don't like" OR "do not want*" OR "don't want*" OR unfair OR switch* OR "switch from" OR "transition from" OR jettison* OR abandon* OR relinquish* OR drop*) w/10AND provider*
21.	((("OON" OR "ONET" OR "out-of-network" OR "out of network" <u>OR out of area OR OOA OR NonPar* OR Non-Par* OR "outside the network" OR "outside of the network" OR "beyond the network" OR OON OR o-o-n OR "o.o.n." OR "o-net*" OR "o net*" OR non-contract* OR noncontract* OR "out-of-network sol*" OR "out of network sol*" OR "end-to-end cost contain*" OR "un contract*" OR "un-contract*" OR "zelis contract*")</u> w/10AND program*) AND (((client* OR sponsor*) w/10AND (elect* OR select* OR choose)) <u>AND w/5</u> (plan OR program OR package))
22.	(reprimand* OR disciplin* OR "disciplinary action" OR "corrective action" OR "warning" OR fired OR dismiss* OR discharg* OR suspend* OR suspension OR fine* OR penalt*) AND ((violat* OR breach* OR noncompli*) w/25AND (competitor* OR "Fair Health" OR FAIRHealth OR Aetna OR (Blue <u>AND w/3</u> Shield) OR BCBS OR Cigna OR Elevance OR Humana <u>OR fair-health OR non-profit* OR "non profit*" OR not-for-profit* OR "not for profit*" OR compet* OR payer* OR payor* OR "dental payer*" OR "dental payor*" OR insur* OR insurer* OR "insurance co*" OR TPA OR "t.p.a." OR "third-party administrat*" OR "third party administrat*" OR "self fund*" OR self-fund* OR UnitedHealth OR UHG OR united* OR unitedhealthgroup OR "united healthcare" OR UHC OR UHCG OR "anthem blue cross of california" OR anthem OR "blue cross of california" OR "blue cross" OR BCCA OR "cigna health and life ins*" OR "healthscope benefits" OR healthscope OR UMR)</u>

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23.	(threat* OR analy* OR analysis OR consider* OR evaluat* OR assess* OR discuss* OR strateg* OR plan* OR "business case" OR "competitive assessment" OR "market assessment" OR <u>OR "market rat*" OR market-rat* OR "full rat*" OR "compet* rat*" OR invoice* OR "full invoic*" OR "as invoic*" OR "as-invoic*" OR "market pric*" OR "full pric*" OR market*)</u> AND Zelis AND W/25 AND (compet*) AND ((payer* OR Aetna OR (Blue AND W/3 Shield) OR BCBS OR Cigna OR Elevance OR Humana OR "Fair Health" OR FAIRHealth OR fair-health OR non-profit* OR "non profit*" OR not-for-profit* OR "not for profit*" OR compet* OR payor* OR "dental payer*" OR "dental payor*" OR insur* OR insurer* OR "insurance co*" OR TPA OR "t.p.a." OR "third-party administrat*" OR "third party administrat*" OR "self fund*" OR self-fund* OR UnitedHealth OR UHG OR united* OR <u>unitedhealthgroup OR "united healthcare" OR UHC OR UHCG OR "anthem blue cross of california" OR anthem OR "blue cross of california" OR "blue cross" OR BCCA OR "cigna health and life ins*" OR "healthscope benefits" OR healthscope OR UMR)</u> W/25 AND (PPO OR "preferred provider organization" OR "preferred provider network"))
24.	("Transparency in Coverage" OR "Transparency in Coverage Rule" OR "TIC Rule" OR "TIC" OR "allowed amount file*" OR "out-of-network allowed amount*" OR "OON allowed amount*" OR <u>OR TIC OR t.i.c. OR t-i-c OR "transparency in coverage rule*" OR "TIC rule*" OR "machine-readable file*" OR MRF OR m.r.f. OR m-r-f OR "TIC MRF files" OR "MRF creat*" OR hub* OR spoke*)</u> AND ((use* OR using OR utiliz* OR leverage* OR employ* OR rely OR relied OR reliance) W/25 AND (suppress* OR reduc* OR lower* OR decrease* OR limit* OR cap* OR control* OR constrain* OR benchmark* OR <u>percent* OR pct* OR % OR amount* OR ceiling* OR caps OR floor* OR threshold* OR threshold* OR cliff* OR fix* OR set* OR default*)</u>) AND ((OON OR "out-of-network" OR "out of network" OR <u>OR out of area OR OOA OR NonPar* OR Non-Par* OR "outside the network" OR "outside of the network" OR "beyond the network" OR OON OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR non-contract* OR noncontract* OR "out-of-network sol*" OR "out of network sol*" OR "end-to-end cost contain*" OR "un contract*" OR "un-contract*" OR "zelis contract*")</u> W/25 AND (payment* OR reimbursement* OR rate* OR rates OR charge* OR cost* OR "allowed amount*" OR "claim payment*" OR <u>OR reproc* OR re-prec* OR IPR OR OPR OR reimbur* OR fix* OR set* OR default* OR de-fault* OR initial* OR original* OR list* OR limit* OR suppress* OR align* OR curtail* OR pric* OR reduc* OR down* OR low* OR depress* OR decreas* OR flat* OR consist* OR custom* OR defensib* OR discount* OR "fair rate*" OR overpa* OR "over-pa*" OR underpa* OR "capture sav*" OR "market-bas*" OR "market bas*" OR "market-based pric*" OR propriat* OR "nonarbitrary*" OR "non-arbitrar*" OR "pre-defin*")</u>))
25.	(hide* OR conceal* OR downplay* OR minimiz* OR obscure* OR suppress* OR destroy* OR delet*) AND (evidence OR document* OR record* OR email* OR communication*) AND ("payer-to-payer" OR "payer to payer" OR "Zelis-to-payer" OR "Zelis to payer" OR ((Zelis OR payer* OR Aetna OR (Blue AND W/3 Shield) OR BCBS OR Cigna OR Elevance OR Humana <u>OR Zellis OR Zelious OR Zellious OR Zeliu OR Zellius OR Zealous OR "zelis.com" OR compet* OR payor* OR "dental payer*" OR "dental payor*" OR insur* OR insurer* OR "insurance co*" OR TPA OR "t.p.a." OR "third-party administrat*" OR "third party administrat*" OR "self fund*" OR self-fund* OR UnitedHealth OR UHG OR united* OR unitedhealthgroup OR "united healthcare" OR UHC OR UHCG OR "anthem blue cross of california" OR anthem OR "blue cross of california" OR "blue cross" OR BCCA OR "cigna health and life ins*" OR "healthscope benefits" OR healthscope OR "UMR, inc." OR "UMR inc" OR UMR)</u> W/25 AND (communicat* OR correspond* OR email* OR message* OR discuss* OR exchange* OR meeting* OR call*)) AND ("OON Repricing Services" OR ((OON OR "out-of-network" OR "out of network" OR <u>OR out of area OR OOA OR NonPar* OR Non-Par* OR "outside the network"</u>

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	<u>OR "outside of the network" OR "beyond the network" OR OON OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR non-contract* OR noncontract* OR "out-of-network sol*" OR "out of network sol*" OR "end-to-end cost contain*" OR "un contract*" OR "un-contract*" OR "zelis contract*")</u> W/10AND (repic* OR "re-prec*" OR pricing OR reimbursement* OR payment* OR rate* OR claim* <u>OR IPR OR OPR OR reimbur* OR fix* OR set* OR default* OR de-fault* OR initial* OR original* OR list* OR limit* OR suppress* OR align* OR curtail* OR reduc* OR down* OR low* OR depress* OR decreas* OR flat* OR consist* OR custom* OR defensib* OR discount* OR "fair rate*" OR overpa* OR "over-pa*" OR underpa* OR "capture sav*" OR "market-bas*" OR "market bas*" OR "market-based pric*" OR propriet* OR "nonarbitrary*" OR "non-arbitrar*" OR "pre-defin*"))</u>
26.	(<u>"Zelis OR Zellis OR Zelious OR Zellious OR Zelius OR Zellius OR Zealous OR "zelis.com"</u>) AND w/5 (Payment* Harmonization Index OR "Payment* Harmonization Index" <u>OR payment* harmon* ind* OR PHI OR p.h.i. OR repic* OR re-prec* OR IPR OR OPR OR reimbur* OR fix* OR set* OR default* OR de-fault* OR initial* OR original* OR list* OR limit* OR suppress* OR align* OR curtail* OR pric* OR reduc* OR down* OR low* OR depress* OR decreas* OR flat* OR consist* OR custom* OR defensib* OR discount* OR "fair rate*" OR overpa* OR "over-pa*" OR underpa* OR "capture sav*" OR "market-bas*" OR "market bas*" OR "market-based pric*" OR propriet* OR "nonarbitrary*" OR "non-arbitrar*" OR "pre-defin*")</u> AND ((survey* OR questionnaire* OR respondent* OR response* OR result* OR data OR dataset* OR "source data" OR "raw data" OR "underlying data" OR "survey data") OR (report* OR dashboard* OR output* OR deliverable* OR analys* OR analysis OR metrics OR score* OR index))
27.	<u>(Open Access Pricing OR OAP OR open access pric*)</u>
28.	<u>(price map* OR pricemap* OR zelis pric* map*)</u>
29.	<u>(Intelligent Pricing Platform OR ZIPP OR intel* pric* platform* OR z.i.p.p. OR "z.i.p.p.")</u>
30.	<u>(Network360 OR Network 360 OR network-360 OR "network-360")</u>
31.	<u>(QuickReprice OR Quick Reprice OR quickrepic* OR "quick repic*" OR quick-repic* OR "quick-repic*")</u>
32.	<u>(Supplemental Network Service* OR supp* network* serv*)</u>
33.	<u>(Accelerated Payment OR AP Program OR AP Network OR accelerat* pa* OR "ap program*" OR "a.p. program*" OR "AP network*" OR "a.p. network*")</u>
34.	<u>(PPO Network Services OR PPO network* OR p.p.o. network* OR wrap network* OR rental network* OR supplement* network*)</u>
35.	<u>(Medical Reimbursement Analysis Service* OR medical reimbursement analysis service*)</u>
36.	<u>(professional negotiation service* OR PNS OR PPNS OR professional negotiat* serv* OR "prof'l negotiat* serv*" OR p.n.s. OR "p.n.s." OR p.p.n.s. OR "p.p.n.s.")</u>
37.	<u>(Availity OR availity OR avail*)</u> AND (<u>Zelis OR Zellis OR Zelious OR Zellious OR Zelius OR Zellius OR Zealous OR zelis.com OR "zelis.com"</u>)

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38.	<u>(America* Health Insurance Plan* OR AHIP OR a.h.i.p. OR "a.h.i.p." OR "america's health insurance plan*" OR "american health insurance plan*" OR "america* health ins* plan*") AND (Zelis OR Zellis OR Zelious OR Zellious OR Zeliu OR Zellius OR Zealous)</u>
39.	<u>(Continuous Discount Agreement* OR CDA OR continuous discount* agreement* OR c.d.a. OR "c.d.a.")</u>
40.	<u>(Stratos* OR Pay-Plus Solutions OR Truvan OR Ethicare OR Strenuus OR Maverest OR NetMinder OR Redcard OR Sapphire Digital OR PayerCompass OR PaySpan OR Medxoom OR Qualident OR 4most OR Lodestone OR Keyclaims OR HealthLink OR OPN OR OPPN OR Coalition America OR stratose* OR strat-ose* OR stratrose* OR strat-rose* OR PHX OR p.h.x. OR "pay-plus solutions" OR payplussolutions OR "payplus solutions" OR "pay plus solutions" OR PPS OR p.p.s. OR truven OR trueven OR "tru ven" OR "true ven" OR ethi-care OR "ethi care" OR strenuus OR strennuus OR strenuous OR strennuous OR mavarest OR mavarast OR mavarest OR meverest OR net-minder OR "net minder" OR red-card OR "red card" OR "sapphire digital" OR sapphire-digital OR sapphiredigital OR "sapphire digital" OR sapphire-digital OR sapphiredigital OR medzoom OR med-xoom OR med-zoom OR "med xoom" OR "med zoom" OR "pay-span" OR "pay span" OR allied OR "allied benefit*" OR "strategic partner") AND ((out of network OR OON OR out of area OR OOA OR NonPar* OR Non-Par* OR "out of network" OR "outside the network" OR "outside of the network" OR "beyond the network" OR "out of network" OR "out-of-network" OR OON OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR "non-par*" OR non-contract* OR noncontract* OR "non contract*" OR "out-of-network sol*" OR "out of network sol*" OR "end-to-end cost contain*" OR "un contract*" OR uncontract* OR "un-contract*" OR "zelis contract*") AND (price* OR pricing OR reproc* OR re-prec* OR reimbur* OR fix* OR set* OR default* OR de-fault* OR "de fault*" OR initial* OR original* OR list* OR limit* OR suppress* OR align* OR curtail* OR pric* OR reduc* OR down* OR low* OR depress* OR decreas* OR flat* OR consist* OR custom* OR defensib* OR defenseib* OR defendab* OR defend-ab* OR "defend-ab*" OR discount* OR "fair rate*" OR overpa* OR "over-pa*" OR "over pa*" OR underpa* OR "under-PA*" OR "under pa*" OR "capture sav*" OR "market-bas*" OR "market bas*" OR "market-based pric*" OR "defensible pric*" OR "defenseible pric*" OR "defendable pric*" OR "defend-ab* pric*" OR propriet* OR reimburs* OR "re-imburs*" OR "nonarbitrary*" OR "non-arbitrar*" OR "pre-defin*"))</u>
41.	<u>(Stratos* OR Pay-Pal Solutions OR Truvan OR Ethicare OR Strenuus OR Maverest OR NetMinder OR Redcard OR Sapphire Digital OR PayerCompass OR PaySpan OR Medxoom OR Qualident OR 4most OR Lodestone OR Keyclaims OR HealthLink OR OPN OR OPPN OR Coalition America OR stratose* OR strat-ose* OR stratrose* OR strat-rose* OR PHX OR p.h.x. OR "pay-plus solutions" OR payplussolutions OR "payplus solutions" OR "pay plus solutions" OR PPS OR p.p.s. OR truven OR trueven OR "tru ven" OR "true ven" OR ethi-care OR "ethi care" OR strenuus OR strennuus OR strenuous OR strennuous OR mavarest OR mavarast OR mavarest OR meverest OR net-minder OR "net minder" OR red-card OR "red card" OR "sapphire digital" OR sapphire-digital OR sapphiredigital OR "sapphire digital" OR sapphire-digital OR sapphiredigital OR medzoom OR med-xoom OR med-zoom OR "med xoom" OR "med zoom" OR "pay-span" OR "pay span" OR allied OR "allied benefit*" OR "strategic partner") AND (reproc* OR re-prec* OR IPR OR OPR OR reimbur* OR fix* OR set* OR default* OR de-fault* OR "de fault*" OR initial* OR original* OR list* OR limit* OR suppress* OR align* OR curtail* OR pric* OR reduc* OR down* OR low* OR depress* OR decreas* OR flat* OR consist* OR custom* OR defensib* OR defenseib* OR defendab* OR defend-ab* OR</u>

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	<u>"defend-ab*" OR discount* OR "fair rate*" OR overpa* OR "over-pa*" OR "over pa*" OR underpa* OR "under-PA*" OR "under pa*" OR "capture sav*" OR "market-bas*" OR "market bas*" OR "market-based pric*" OR "defensible pric*" OR "defenseible pric*" OR "defendable pric*" OR "defend-ab* pric*" OR propriet* OR reimburs* OR "re-imburs*" OR "nonarbitrary*" OR "non-arbitrar*" OR "pre-defin*")</u>
42.	<u>(Claim Pass OR ClaimPass OR CPS OR CSPS OR claim-pass* OR "claim-pass*" OR CPS OR c.p.s. OR "c.p.s." OR CSPS OR c.s.p.s. OR "c.s.p.s.") AND (Zelis OR Zellis OR Zelious OR Zellious OR Zelius OR Zellius OR Zealous OR zelis.com OR "zelis.com")</u>
43.	<u>(Claim Pass OR ClaimPass OR CPS OR CSPS OR claim-pass* OR "claim-pass*" OR CPS OR c.p.s. OR "c.p.s." OR CSPS OR c.s.p.s. OR "c.s.p.s.") AND (repic* OR re-pric* OR IPR OR OPR OR out of network OR OON OR out of area OR OOA OR NonPar* OR Non-Par* OR reimburs* OR fix* OR set* OR default* OR de-fault* OR "de fault*" OR initial* OR original* OR list* OR limit* OR suppress* OR align* OR curtail* OR pric* OR reduc* OR down* OR low* OR depress* OR decreas* OR flat* OR consist* OR custom* OR defensib* OR defenseib* OR defendab* OR defend-ab* OR "defend-ab*" OR discount* OR "fair rate*" OR overpa* OR "over-pa*" OR "over pa*" OR underpa* OR "under-PA*" OR "under pa*" OR "capture sav*" OR "market-bas*" OR "market bas*" OR "market-based pric*" OR "defensible pric*" OR "defenseible pric*" OR "defendable pric*" OR "defend-ab* pric*" OR propriet* OR reimburs* OR "re-imburs*" OR "nonarbitrary*" OR "non-arbitrar*" OR "pre-defin*" OR "out of network" OR "outside the network" OR "outside of the network" OR "beyond the network" OR "out of network" OR "out-of-network" OR OON OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR "non-par*" OR non-contract* OR noncontract* OR "non contract*" OR "out-of-network sol*" OR "out of network sol*" OR "end-to-end cost contain*" OR "un contract*" OR uncontract* OR "un-contract*" OR "zelis contract*")</u>
44.	<u>DeSantis Breindel OR (DeSantis Breindel OR desantisbreindel OR desantis OR breindel OR "de santis breindel" OR "de santis") AND (Zelis OR Zellis OR Zelious OR Zellious OR Zelius OR Zellius OR Zealous OR zelis.com OR "zelis.com")</u>
45.	<u>(Zelis OR Zellis OR Zelious OR Zellious OR Zelius OR Zellius OR Zealous OR zelis.com OR "zelis.com") AND (Aetna OR Cigna OR Elevance OR UnitedHealth OR United Health OR UHG OR compet* OR payer* OR payor* OR "dental payer*" OR "dental payor*" OR insur* OR insurer* OR "insurance co*" OR TPA OR "t.p.a." OR "third-party administrat*" OR "third party administrat*" OR "self fund*" OR self-fund* OR zelis OR zelis.com OR meritain OR "meritain health, inc." OR "meritain health" OR "meritain health dispute resol*" OR "the cigna group" OR "cigna group" OR humana OR united* OR "united health" OR unitedhealthgroup OR "unitedhealth group" OR "united healthgroup" OR "united healthcare" OR unitedhealthcare OR UHG OR "u.h.g." OR UHC OR "u.h.c." OR UHCG OR "u.h.c.g." OR "anthem blue cross of california" OR anthem OR "blue cross of california" OR "blue cross" OR BCCA OR "cigna health and life ins*" OR "healthscope benefits" OR healthscope OR "health scope" OR "healthscope benefits, inc." OR "UMR, inc." OR "UMR inc" OR UMR)</u>
46.	<u>(Zelis OR Zellis OR Zelious OR Zellious OR Zelius OR Zellius OR Zealous OR zelis.com OR "zelis.com") AND ((out of network OR OON OR out of area OR OOA OR NonPar* OR Non-Par* OR "out of network" OR "outside the network" OR "outside of the network" OR "beyond the network" OR "out of network" OR "out-of-network" OR OON OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o</u>

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	<u>net*</u> OR <u>"non-par"</u> OR <u>non-contract*</u> OR <u>noncontract*</u> OR <u>"non contract"</u> OR <u>"out-of-network sol"</u> OR <u>"out of network sol"</u> OR <u>"end-to-end cost contain"</u> OR <u>"un contract"</u> OR <u>uncontract*</u> OR <u>"un-contract"</u> OR <u>"zelis contract"</u>) AND (claim OR claims OR pay* OR paid OR unpaid OR payment* OR reimburs* OR amount* OR rate* OR level*))
47.	<u>(Pacific Inpatient OR Scaccia OR (Dennis AND Ayer) OR Bachoua OR "pacific inpatient" OR "pacific inpatient medical group" OR pacific OR PIMG OR "p.i.m.g." OR ayer OR APC OR "a.p.c." OR DBC OR "d.b.c." OR "4 missing peace" OR "4 missing peace corps, Inc." OR "missing peace" OR "the missing peace center" OR "rhodes-levin" OR "chris laurence" OR laurence OR "ethan ciment" OR "ciment" OR "chelsea foot and ankle p.c." OR chelsea OR "chelsea foot") AND (Zelis OR Zellis OR Zelious OR Zellious OR Zelius OR Zellius OR Zealous OR zelis.com OR "zelis.com")</u>
48.	<u>(Pacific Inpatient OR Scaccia OR (Dennis AND Ayer) OR Bachoua OR "pacific inpatient" OR "pacific inpatient medical group" OR pacific OR PIMG OR "p.i.m.g." OR ayer OR APC OR "a.p.c." OR DBC OR "d.b.c." OR "4 missing peace" OR "4 missing peace corps, Inc." OR "the missing peace center" OR "missing peace" OR "rhodes-levin" OR "chris laurence" OR laurence OR "ethan ciment" OR "ciment" OR "chelsea foot and ankle p.c." OR chelsea OR "chelsea foot") AND (repic* OR re-prec* OR IPR OR OPR OR reimburs* OR fix* OR set* OR default* OR de-fault* OR "de fault*" OR initial* OR original* OR list* OR limit* OR suppress* OR align* OR curtail* OR pric* OR reduc* OR down* OR low* OR depress* OR decreas* OR flat* OR consist* OR custom* OR defensib* OR defenseib* OR defendab* OR defend-ab* OR "defend-ab*" OR discount* OR "fair rate*" OR overpa* OR "over-pa*" OR "over pa*" OR underpa* OR "under-PA*" OR "under pa*" OR "capture sav*" OR "market-bas*" OR "market bas*" OR "market-based pric*" OR "defensible pric*" OR "defenseible pric*" OR "defendable pric*" OR "defend-ab* pric*" OR propriet* OR reimburs* OR "re-imburs*" OR "nonarbitrary*" OR "non-arbitrar*" OR "pre-defin*")</u>
49.	<u>(Pacific Inpatient OR Scaccia OR (Dennis AND Ayer) OR Bachoua OR "pacific inpatient" OR "pacific inpatient medical group" OR pacific OR PIMG OR "p.i.m.g." OR ayer OR APC OR "a.p.c." OR DBC OR "d.b.c." OR "4 missing peace" OR "4 missing peace corps, Inc." OR "missing peace" OR "the missing peace center" OR "rhodes-levin" OR "chris laurence" OR laurence OR "ethan ciment" OR "ciment" OR "chelsea foot and ankle p.c." OR chelsea OR "chelsea foot") AND (out of network OR OON OR out of area OR OOA OR NonPar* OR Non-Par* OR "out of network" OR "outside the network" OR "outside of the network" OR "beyond the network" OR "out of network" OR "out-of-network" OR OON OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR "non-par*" OR non-contract* OR noncontract* OR "non contract*" OR "out-of-network sol*" OR "out of network sol*" OR "end-to-end cost contain*" OR "un contract*" OR uncontract* OR "un-contract*" OR "zelis contract*")</u>
50.	<u>(Stratos* OR Pay-Plus Solutions OR Truvan OR EthiCare OR Strenuus OR Maverest OR NetMinder OR Redcard OR Sapphire Digital OR PayerCompass OR PaySpan OR Medxoom OR Qualident OR 4most OR Lodestone OR Keyclaims OR HealthLink OR OPN OR OPPN OR Coalition America OR stratose* OR strat-ose* OR stratrose* OR strat-rose* OR PHX OR p.h.x. OR "pay-plus solutions" OR payplussolutions OR "payplus solutions" OR "pay plus solutions" OR PPS OR p.p.s. OR truven OR trueven OR "tru ven" OR "true ven" OR ethi-care OR "ethi care" OR strennus OR strennuus OR strenuous OR strennuous OR mavarest OR mavarast OR mavarest OR meverest OR net-minder OR "net minder" OR red-card OR "red card" OR "sapphire digital" OR sapphire-digital OR sapphiredigital OR "saphire digital" OR saphire-digital OR sapphiredigital OR medzoom OR med-xoom OR med-zoom OR "med xoom" OR "med zoom" OR "pay-span" OR "pay span" OR allied OR</u>

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	<u>"allied benefit*" OR "strategic partner") AND (agreement* OR amend* OR statement* of work OR SOW OR SOWs OR exhibit OR exhibits OR contract*) OR (agreement* OR amend* OR statement* of work OR SOW OR SOWs OR exhibit OR exhibits OR contract* OR contract* OR s.o.w. OR "s.o.w." OR "sow*" OR "statement* of work*" OR "stmt* of work*" OR amend* OR "side letter*" OR "side-letter*" OR agree* OR "MOU" OR m.o.u. OR "m.o.u." OR "MOA" OR m.o.a. OR "m.o.a." OR LOI OR l.o.i. OR "l.o.i." OR "LOA" OR l.o.a. OR "l.o.a.")</u>
51.	<u>(out of network OR OON OR out of area OR OOA OR NonPar* OR Non-Par* OR "out of network" OR "outside the network" OR "outside of the network" OR "beyond the network" OR "out of network" OR "out-of-network" OR OON OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR "non-par*" OR non-contract* OR noncontract* OR "non contract*" OR "out-of-network sol*" OR "out of network sol*" OR "end-to-end cost contain*" OR "un contract*" OR uncontract* OR "un-contract*" OR "zelis contract*") AND (marketshare* OR market share* OR "geograph* adjust*" OR "geograph* scop*" OR "geograph* reach*" OR "geograph* area*" OR "geograph* market*")</u>
52.	<u>(out of network OR OON OR out of area OR OOA OR NonPar* OR Non-Par* OR "out of network" OR "outside the network" OR "outside of the network" OR "beyond the network" OR "out of network" OR "out-of-network" OR OON OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR "non-par*" OR non-contract* OR noncontract* OR "non contract*" OR "out-of-network sol*" OR "out of network sol*" OR "end-to-end cost contain*" OR "un contract*" OR uncontract* OR "un-contract*" OR "zelis contract*") AND (market OR markets OR "market rat*" OR market-rat* OR "full rat*" OR "compet* rat*" OR invoice* OR "full invoic*" OR "as invoic*" OR "as-invoic*" OR "market pric*" OR "full pric*" OR market*)</u>
53.	<u>(out of network OR OON OR out of area OR OOA OR NonPar* OR Non-Par* OR "out of network" OR "outside the network" OR "outside of the network" OR "beyond the network" OR "out of network" OR "out-of-network" OR OON OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR "non-par*" OR non-contract* OR noncontract* OR "non contract*" OR "out-of-network sol*" OR "out of network sol*" OR "end-to-end cost contain*" OR "un contract*" OR uncontract* OR "un-contract*" OR "zelis contract*") AND (compet* OR conspir* OR co-conspir* OR "co conspir*" OR cartel* OR agree* OR collu* OR manipul* OR influen* OR lower OR decrease OR fix* OR default* OR de-fault* OR "de fault*" OR initial* OR original* OR list* OR coordinat* OR set* OR align* OR "go above" OR "adhere" OR cartel* OR agree* OR compet* OR "absence of compet*" OR "absent compet*" OR "DO not compet*" OR "no longer compet*" OR "avoid compet*" OR "lack of compet*" OR "decreased levels of compet*" OR "lessened compet*" OR "relief from compet*" OR "relieved from compet*" OR "competitive relie*" OR violat* OR antitrust* OR "anti-trust*" OR "anti trust*" OR coordinat* OR "co-ordinat*" OR "co ordinat*" OR "anti-compet*" OR anticompet* OR "anti compet*")</u>
54.	<u>(Transparency in Coverage OR TIC OR (transparency AND W/5 rule) OR "transparency in coverage" OR TIC OR t.i.c. OR "t.i.c." OR t-i-c OR "t-i-c" OR "transparency in coverage rule*" OR "TIC rule*" OR "t.i.c. rule*" OR "t-i-c rule*" OR "machine-readable file*" OR MRF OR m.r.f. OR "m.r.f." OR m-r-f OR "m-r-f" OR compl* OR "TIC MRF files" OR "t.i.c. m.r.f." OR "MRF creat*" OR "m.r.f. creat*" OR hub* OR spoke*) AND (repic* OR re-prec* OR IPR OR OPR OR reimbur* OR fix* OR set* OR default* OR de-fault* OR "de fault*" OR initial* OR original* OR list* OR limit* OR suppress* OR align* OR curtail* OR pric* OR reduc* OR down* OR low* OR depress* OR decreas* OR flat* OR consist* OR custom* OR defensib* OR defenseib* OR defendab* OR defend-ab* OR "defend-ab*" OR</u>

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	<u>discount* OR "fair rate*" OR overpa* OR "over-pa*" OR "over pa*" OR underpa* OR "under-PA*" OR "under pa*" OR "capture sav*" OR "market-bas*" OR "market bas*" OR "market-based pric*" OR "defensible pric*" OR "defenseible pric*" OR "defendable pric*" OR "defend-ab* pric*" OR propriat* OR reimburs* OR "re-imburs*" OR "nonarbitrary*" OR "non-arbitrar*" OR "pre-defin*")</u>
55.	<u>(Zelis OR Zellis OR Zelious OR Zellious OR Zeliu* OR Zellius OR Zealous OR zelis.com OR "zelis.com") AND (conspir* OR co-conspir* OR "co conspir*" OR cartel* OR agree* OR collu* OR manipul* OR influen* OR lower OR decrease OR fix* OR default* OR de-fault* OR "de fault*" OR initial* OR original* OR list* OR coordinat* OR set* OR align* OR "go above" OR "adhere" OR cartel* OR agree* OR compet* OR "absence of compet*" OR "absent compet*" OR "DO not compet*" OR "no longer compet*" OR "avoid compet*" OR "lack of compet*" OR "decreased levels of compet*" OR "lessened compet*" OR "relief from compet*" OR "relieved from compet*" OR "competitive relie*" OR violat* OR antitrust* OR "anti-trust*" OR "anti trust*" OR coordinat* OR "co-ordinat*" OR "co ordinat*" OR "anti-compet*" OR anticompet* OR "anti compet*" OR compet*)</u>
56.	<u>(Zelis OR Zellis OR Zelious OR Zellious OR Zeliu* OR Zellius OR Zealous OR zelis.com OR "zelis.com") AND (market OR markets OR "market rat*" OR market-rat* OR "full rat*" OR "compet* rat*" OR invoic* OR "full invoic*" OR "as invoic*" OR "as-invoic*" OR "market pric*" OR "full pric*" OR market* OR marketshare* OR market share* OR "geograph* adjust*" OR "geograph* scop*" OR "geograph* reach*" OR "geograph* area*" OR "geograph* market*"))</u>
57.	<u>((compet* OR Aetna OR Cigna OR Elevance OR UnitedHealth OR United Health OR UHG OR payer* OR payor* OR "dental payer*" OR "dental payor*" OR insur* OR insurer* OR "insurance co*" OR TPA OR "t.p.a." OR "third-party administrat*" OR "third party administrat*" OR "self fund*" OR self-fund* OR zelis OR zelis.com OR meritain OR "meritain health, inc." OR "meritain health" OR "meritain health dispute resol*" OR "the cigna group" OR "cigna group" OR humana OR united* OR "united health" OR unitedhealthgroup OR "unitedhealth group" OR "united healthgroup" OR "united healthcare" OR unitedhealthcare OR UHG OR "u.h.g." OR UHC OR "u.h.c." OR UHCG OR "u.h.c.g." OR "anthem blue cross of california" OR anthem OR "blue cross of california" OR "blue cross" OR BCCA OR "cigna health and life ins*" OR "healthscope benefits" OR healthscope OR "health scope" OR "healthscope benefits, inc." OR "UMR, inc." OR "UMR inc" OR UMR) AND (Zelis OR Zellis OR Zelious OR Zellious OR Zeliu* OR Zellius OR Zealous OR zelis.com OR "zelis.com")) AND (terminat* OR fire OR fired OR firing OR disciplin* OR suspen* OR reprimand* OR violat* OR review* OR eval* OR assess* OR hir* OR promot* OR demot* OR resign* OR incentiv* OR rais*)</u>
58.	<u>((compet* OR Aetna OR Cigna OR Elevance OR UnitedHealth OR United Health OR UHG OR payer* OR payor* OR "dental payer*" OR "dental payor*" OR insur* OR insurer* OR "insurance co*" OR TPA OR "t.p.a." OR "third-party administrat*" OR "third party administrat*" OR "self fund*" OR self-fund* OR zelis OR zelis.com OR meritain OR "meritain health, inc." OR "meritain health" OR "meritain health dispute resol*" OR "the cigna group" OR "cigna group" OR humana OR united* OR "united health" OR unitedhealthgroup OR "unitedhealth group" OR "united healthgroup" OR "united healthcare" OR unitedhealthcare OR UHG OR "u.h.g." OR UHC OR "u.h.c." OR UHCG OR "u.h.c.g." OR "anthem blue cross of california" OR anthem OR "blue cross of california" OR "blue cross" OR BCCA OR "cigna health and life ins*" OR "healthscope benefits" OR healthscope OR "health scope" OR "healthscope benefits, inc." OR "UMR, inc." OR "UMR inc" OR UMR) AND (out of network OR OON OR out of area OR OOA OR NonPar* OR Non-Par* OR "out of network" OR "outside the network" OR "outside of the network" OR "beyond the network" OR "out of network"</u>

Search No.	Plaintiffs' 8/24/26 Revisions and Additions to United's 7/1/26 Proposed Search Terms
	<u>OR "out-of-network" OR OON OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR "non-par*" OR non-contract* OR noncontract* OR "non contract*" OR "out-of-network sol*" OR "out of network sol*" OR "end-to-end cost contain*" OR "un contract*" OR uncontract* OR "un-contract*" OR "zelis contract*")) AND (terminat* OR fire OR fired OR firing OR disciplin* OR suspen* OR reprimand* OR violat* OR review* OR eval* OR assess* OR hir* OR promot* OR demot* OR resign* OR incentiv* OR rais*)</u>
59.	<u>(Zelis OR Zellis OR Zelious OR Zellious OR Zeliu OR Zellius OR Zealous OR zelis.com OR "zelis.com") AND (Aetna OR Cigna OR Elevance OR UnitedHealth OR United Health OR UHG OR compet* OR payer* OR payor* OR "dental payer*" OR "dental payor*" OR insur* OR insurer* OR "insurance co*" OR TPA OR "t.p.a." OR "third-party administrat*" OR "third party administrat*" OR "self fund*" OR self-fund* OR zelis OR zelis.com OR meritain OR "meritain health, inc." OR "meritain health" OR "meritain health dispute resol*" OR "the cigna group" OR "cigna group" OR humana OR united* OR "united health" OR unitedhealthgroup OR "unitedhealth group" OR "united healthgroup" OR "united healthcare" OR unitedhealthcare OR UHG OR "u.h.g." OR UHC OR "u.h.c." OR UHCG OR "u.h.c.g." OR "anthem blue cross of california" OR anthem OR "blue cross of california" OR "blue cross" OR BCCA OR "cigna health and life ins*" OR "healthscope benefits" OR healthscope OR "health scope" OR "healthscope benefits, inc." OR "UMR, inc." OR "UMR inc" OR UMR)</u>
60.	<u>(ingenix OR "ingenix databas*" OR "new york attorney general*" OR nyag* OR n.y.a.g. OR "n.y.a.g." OR "state of new york" OR "office of the attorney general*" OR oag* OR o.a.g. OR "o.a.g." OR cuomo OR "ag office" OR "ag's office" OR "a.g. office" OR "a.g.'s office")</u>
61.	<u>(investigat* OR settl* OR "assurance of discontinu*" OR "assur* of discontinu*" OR agree* OR cid* OR "c.i.d." OR "civil investigat* demand*")</u>
62.	<u>(antitrust* OR anti-trust* OR "trade regulation*" OR "antitrust train*" OR "anti-trust train*" OR "antitrust guid*" OR "anti-trust guid*" OR "antitrust protocol*" OR "anti-trust protocol*" OR "Sherman Act" OR "15 U.S.C. § 1" OR "Clayton Act" OR "15 U.S.C. § 26")</u>
63.	<u>("independent database*" OR "not-for-profit compan*" OR "not for profit compan*" OR "non-profit compan*" OR "non profit compan*" OR "fair health" OR "exclus* period*" OR "exclus* term*" OR "exclus* us*" OR "fair market*" OR "reasonable and customary" OR "r and c" OR "r & c" OR "usual, customary and reasonable" OR "usual, customary, and reasonable" OR UCR OR u.c.r. OR "usual, customary & reasonable" OR "customary & reasonable" OR "customary and reasonable" OR "usual and customary" OR "usual & customary" OR "market rat*")</u>
64.	<u>(Bain OR "Bain Capital" OR Parthenon OR "Parthenon Capital" OR Mubadala OR "Mubadala Investment Company" OR HarbourVest OR HarborVest OR Guidehouse OR "Office Ally" OR "private equity" OR invest* OR loan* OR credit*) AND (Zelis OR Zellis OR Zelious OR Zellious OR Zeliu OR Zellius OR Zealous OR zelis.com OR "zelis.com" OR control* OR leverag* OR steer* OR oblig* OR dictat* OR restrict*) AND out of network OR OON OR out of area OR OOA OR NonPar* OR Non-Par* OR "out of network" OR "outside the network" OR "outside of the network" OR "beyond the network" OR "out of network" OR "out-of-network" OR OON OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR "non-par*" OR non-contract* OR noncontract* OR "non contract*" OR "out-</u>

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	<u>of-network sol*" OR "out of network sol*" OR "end-to-end cost contain*" OR "un contract*" OR uncontract* OR "un-contract*" OR "zelis contract*")</u>
65.	<u>(shar* OR distribut* OR contract* OR agree* OR exchang* OR deliver* OR upload* OR up-load* OR "up load*" OR download* OR down-load* OR "down load*" OR sen* OR transfer* OR ftp* OR f.t.p. OR protocol* OR portal* OR compat* OR scoop* OR bulk* OR load*) AND (pa* OR contract* OR sensitiv* OR "competitively sensitive" OR competitively-sensitive OR "commercially sensitive" OR commercially-sensitive OR CSI* OR c.s.i. OR "c.s.i." OR c-s-i* OR "c-s-i" OR priv* OR confid* OR proprietar* OR claim* OR pric* OR sav* OR expen* OR cost* OR information* OR info* OR data* OR datum*)</u>
66.	<u>(architect* OR "national network*" OR "nat'l network*" OR "natl network*" OR "nationwide network*" OR "regional network*" OR "area network*" OR "local network*" OR "provider network*" OR "dental network architect*" OR "healthcare network architect*" OR "dental network*" OR "healthcare network*" OR "network* architect*" OR "primary network*" OR "secondary network*" OR "wrap network*" OR "rental network*" OR "supplement* network*" OR "specialty network*" OR "proprietary network*" OR "model preferred provider network*" OR "design preferred provider network*" OR "build preferred provider network*" OR "model ppo*" OR "design ppo*" OR "build ppo*" OR "network analytic*" OR "network design*" OR "network* access*" OR "network* sav*" OR "network* pay*" OR "network* communic*" OR "network* manag*" OR "claim* integrit*" OR "pa* remit*" OR "our network*" OR "your network*")</u>
67.	<u>("zelis forum" OR forum* OR fora* OR "lost pines resort" OR "lost pines resort and spa" OR "lost pines resort & spa" OR "hyatt regency lost pines resort and spa" OR "hyatt regency lost pines resort & spa" OR hyatt OR regency OR resort* OR "lost pines" OR "boca raton" OR retreat* OR conference* OR "annual confer*" OR "client* confer*" OR "customer* confer*" OR "payer* confer*" OR "payor* confer*" OR "corporate event*" OR "indus* event*" OR "payer* event*" OR "payor* event*" OR "executiv* event*")</u>
68.	<u>("client* confer*" OR "customer* confer*" OR "annual confer*" OR conference* OR note* OR client* OR customer* OR payer* OR payor* OR transcri* OR audio* OR record* OR "audio record*" OR "video record*" OR video OR "visual record*" OR film* OR a.v. OR "a.v." OR av* OR "audio video*" OR audio-video* OR audio-visual* OR "audio visual*" OR present* OR poll* OR "tabl* activit*" OR handout* OR hand-out* OR "hand out*" OR leave-behind* OR "leave behind*" OR packet* OR speech* OR "room assign*" OR "client* meet*" OR "customer* meet*" OR "compet* meet*" OR "compet* communicat*" OR "meet* with client*" OR "meet* with customer*" OR "met* with client*" OR "met* with customer*" OR "met* with compet*" OR "desantis breindel" OR desantisbreindel OR desantis OR breindel OR "de santis breindel" OR "de santis")</u>
69.	<u>(investigat* OR "department of justice" OR DOJ OR "grand jur*" OR "department of labor" OR DOL OR congress* OR "federal trade commission" OR FTC OR FBI OR "state investigat*") AND (Zelis OR Zellis OR Zelious OR Zellious OR Zeliu* OR Zellius OR Zealous OR zelis.com OR "zelis.com" OR reproc* OR re-pric* OR reimbur* OR pric* OR discount* OR "fair rate*" OR overpa* OR underpa* OR "capture sav*" OR "market-bas*" OR "market bas*" OR "market-based pric*" OR "defensible pric*" OR nonarbitrar* OR "non-arbitrar*" OR "pre-defin*" OR "out of network" OR OON OR "out-of-network" OR "outside the network" OR "outside of the network" OR "beyond the network" OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR nonpar* OR "non-par*" OR non-contract*</u>

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	<u>OR noncontract* OR "non contract*" OR "out-of-network sol*" OR "out of network sol*" OR "un contract*" OR uncontract* OR "un-contract*" OR "zelis contract*" OR conspir* OR co-conspir* OR cartel* OR collu* OR coordinat* OR agree* OR antitrust* OR "anti-trust*" OR anticompet* OR "anti-compet*" OR compet* OR "absence of compet*" OR "lack of compet*" OR "lessened compet*" OR "competitive relie*")</u>
70.	<u>(disput* OR appeal* OR adjudicat* OR negotiat* OR renegotiat* OR parameter* OR "appeal* parameter*" OR adjust* OR reten* OR "initial payment offer*" OR "claims negotiat*" OR reprocess* OR "best and final" OR "negotiat* discount*" OR post-repric*) AND (repric* OR re-pric* OR reimburs* OR pric* OR discount* OR "fair rate*" OR overpa* OR underpa* OR "capture sav*" OR "market-bas*" OR "market bas*" OR "market-based pric*" OR "defensible pric*" OR nonarbitrar* OR "non-arbitrar*" OR "pre-defin*" OR "out of network" OR OON OR "out-of-network" OR "outside the network" OR "outside of the network" OR "beyond the network" OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR nonpar* OR "non-par*" OR non-contract* OR noncontract* OR "non contract*" OR "out-of-network sol*" OR "out of network sol*" OR "un contract*" OR uncontract* OR "un-contract*" OR "zelis contract*")</u>
71.	<u>(report* OR data* OR survey* OR summar* OR memo* OR artic* OR document* OR "white paper*" OR whitepaper* OR powerpoint* OR blog* OR deliverab* OR metric* OR dashboard* OR stud* OR projection* OR estimat* OR model*) AND (repric* OR re-pric* OR reimburs* OR pric* OR discount* OR "fair rate*" OR overpa* OR underpa* OR "capture sav*" OR "market-bas*" OR "market bas*" OR "market-based pric*" OR "defensible pric*" OR nonarbitrar* OR "non-arbitrar*" OR "pre-defin*" OR "out of network" OR OON OR "out-of-network" OR "outside the network" OR "outside of the network" OR "beyond the network" OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR nonpar* OR "non-par*" OR non-contract* OR noncontract* OR "non contract*" OR "out-of-network sol*" OR "out of network sol*" OR "un contract*" OR uncontract* OR "un-contract*" OR "zelis contract*")</u>
72.	<u>("artificial intelligence" OR "artificial* intel*" OR AI OR "a.i." OR algorithm* OR "ai-power*") AND (repric* OR pric* OR reimburs* OR rout* OR method* OR methodolog* OR technolog* OR process* OR system*)</u>
73.	<u>(liab* OR culp* OR admi* OR conced* OR acknowledg* OR own* OR operat* OR manag* OR control* OR delegat* OR relinquish* OR entrust* OR ced* OR responsib* OR "network architect*" OR "network design*" OR "provider network*" OR "zelis ppo*" OR "zelis preferred provider org*" OR "wrap network*" OR "rental network*" OR "supplement* network*" OR PPO OR "preferred provider network*") AND ("out of network" OR OON OR "out-of-network" OR "outside the network" OR "outside of the network" OR "beyond the network" OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR nonpar* OR "non-par*" OR non-contract* OR noncontract* OR "non contract*" OR "out-of-network sol*" OR "out of network sol*" OR "un contract*" OR uncontract* OR "un-contract*" OR "zelis contract*" OR purcha* OR buy* OR bought*)</u>
74.	<u>(launch* OR brand* OR rebrand* OR re-brand* OR nam* OR renam* OR re-nam* OR "new* nam*" OR expir* OR terminat* OR "exclusive use*" OR exclusiv* OR "five year*" OR "5 year*" OR "June 13, 2016" OR 6/13/2016 OR 6-13-2016 OR "August 13, 2024" OR 8/13/2024 OR 8-13-2024 OR "top 5" OR "top five" OR "five largest" OR "5 largest" OR "500 client*" OR "750 client*" OR "770 client*")</u>

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	OR "repricing client*" OR "repricing customer*") AND (Zelis OR Zellis OR Zelious OR Zellious OR Zeliu OR Zellu OR Zealous OR zelis.com OR "zelis.com")

EXHIBIT 2

Search No.	Plaintiffs' 8/25/26 Revisions and Additions to Zelis' 7/1/26 Proposed Search Terms
1.	((acqui* OR merger* OR "joint venture*" OR licens* OR patent* OR develop* OR deploy* OR launch* OR <u>affiliat*</u> OR <u>subsid*</u> OR <u>partner*</u> OR <u>owner*</u> OR <u>operat*</u> OR <u>manag*</u> OR <u>control*</u> OR <u>invest*</u> OR <u>supervis*</u> OR <u>run*</u>) w/10 AND ("OON" OR "out-of-network" OR "out of network" OR "outside the network" OR "outside of the network" OR "beyond the network" OR OOA OR "out of area" OR <u>nonpar*</u> OR "non-par*" OR <u>noncontract*</u> OR "non-contract*" OR <u>uncontract*</u> OR "un-contract*" OR <u>repric*</u> OR <u>reimbur*</u> OR Maverest OR EthiCare OR Rivet OR Stratose OR PHX OR "Pay-Plus" OR "Pay Plus" OR Truven OR Strennus OR NetMinder OR RedCard OR "Sapphire Digital" OR PayerCompass OR PaySpan OR Medxoom }} OR <u>PayerCompass</u> OR <u>Qualident</u> OR <u>Strenuus</u> OR "Pay-Plus Solutions"))
2.	((owner* OR operat* OR manag* OR <u>acqui*</u> OR <u>merger*</u> OR "joint venture*" OR <u>licens*</u> OR <u>patent*</u> OR <u>develop*</u> OR <u>deploy*</u> OR <u>launch*</u> OR <u>control*</u> OR <u>supervis*</u> OR <u>run*</u> OR <u>purchas*</u> OR <u>affiliat*</u> OR <u>subsid*</u> OR <u>partner*</u> OR <u>invest*</u>) w/10 AND (4Comp OR "4 Comp" OR "4Most Dental" OR "4 Most Dental" OR "4Most Health" OR "4 Most Health" OR HFN OR Maverest OR "PPO Plus" OR PPOPlus OR Qualident OR Stratose OR <u>PayerCompass</u> OR <u>Strenuus</u> OR "Pay-Plus Solutions"))
3.	((investor* OR creditor* OR lender* OR <u>partner*</u> OR "strategic partner*" OR "earnings call*" OR conference*) AND-w/10 ("OON" OR "out-of-network" OR "out of network" OR "outside the network" OR "outside of the network" OR "beyond the network" OR OOA OR "out of area" OR <u>nonpar*</u> OR "non-par*" OR <u>noncontract*</u> OR "non-contract*" OR <u>uncontract*</u> OR "un-contract*" OR <u>repric*</u> OR <u>reimbur*</u> OR "claims pric* <u>ing</u> "))
4.	(("OON" OR "out-of-network" OR "out of network" OR OON pricing OR "outside the network" OR "outside of the network" OR "beyond the network" OR OOA OR "out of area" OR <u>nonpar*</u> OR "non-par*" OR <u>noncontract*</u> OR "non-contract*" OR <u>uncontract*</u> OR "un-contract*") OR ((repric* OR "claims pric* <u>ing</u> " OR pric* <u>ing</u>) w/3 AND OON)) AND-w/10 (tool* OR technolog* OR methodolog* OR formula* OR algorithm* OR system OR model* OR benchmark* OR metric* OR guideline* OR polic* OR procedure* OR training* OR "loss adjustment*" OR budget* OR "ai" OR "artificial* intelligen*" OR "gen* a.i." OR "gen* ai" OR "gen-ai" OR "gen-a.i." OR "machin* learn*" OR "est* reimburs* schedul*" OR "fee schedul*" OR "est* reimburs* service*" OR "est* reimburs* sol*" OR ers OR "e.r.s." OR e-r-s OR "e-r-s" OR "schedul*" OR "reference-bas* pric*" OR "reference bas* pric*" OR "referenced-bas* pric*" OR "referenced bas* pric*" OR rbp OR r.b.p. OR "r.b.p." OR r-b-p OR "r-b-p" OR "auto* rout*"))
5.	((meeting* OR conference* OR forum OR <u>call</u> OR retreat* OR invitation* OR agenda* OR minute* OR notes OR transcript* OR presentation* OR "room assignment*" OR "table assignment*" OR <u>handout*</u> OR <u>poll*</u> OR <u>slide*</u> OR recording* OR assignment* OR operat*) w/10 AND (((DeSantis w/105 Breindel) OR <u>DeSantis Breindel</u> OR <u>desantisbreindel</u> OR <u>desantisbreindel@</u> OR "desantisbreindel@" OR desantis OR breindel OR "de santis breindel" OR "de santis" OR payer* OR payor* OR insurer* OR Aetna OR Cigna OR Elevance OR Humana OR UnitedHealth OR UnitedHealthcare OR UHC OR UMR OR <u>united healthcare</u> OR <u>u.h.g.</u> OR <u>u.h.c.</u> OR <u>uhcg</u> OR <u>u.h.c.g.</u> OR "dental payer*" OR "dental payor*" OR <u>insur*</u> OR <u>insurer*</u> OR "insurance co*" OR TPA OR "t.p.a." OR "third-party administrat*" OR "third party administrat*" OR "self fund*" OR self-fund* OR meritain OR "meritain health, inc." OR "meritain health" OR "meritain health dispute resol*" OR cigna OR "the cigna group" OR "cigna group" OR "anthem blue cross of california" OR anthem OR "blue cross of california" OR "blue cross" OR BCCA OR "cigna health and life ins*" OR "healthscope benefits" OR

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	<u>healthscope OR "health scope" OR "healthscope benefits, inc." OR "UMR, inc." OR "UMR inc" OR repricer* OR Availity OR availity OR avail* OR AHIP OR America* Health Insurance Plan* OR a.h.i.p. OR "a.h.i.p." OR "america's health insurance plan*" OR "american health insurance plan*" OR "america* health ins* plan*") AND ("claim*" AND ("out-of-network" OR "OON" OR "outside the network" OR "outside of the network" OR "beyond the network" OR OOA OR "out of area" OR nonpar* OR "non-par*" OR noncontract* OR "non-contract*" OR uncontract* OR "un-contract*"))))</u>
6.	<u>((("Zelis Forum" OR zelis conference OR zelis retreat OR "client* confer*" OR "customer* confer*" OR "annual confer*" OR fora* OR "lost pines resort" OR "lost pines resort and spa" OR "lost pines resort & spa" OR "hyatt regency lost pines resort and spa" OR "hyatt regency lost pines resort & spa" OR hyatt OR regency OR resort* OR "lost pines" OR "boca raton" OR retreat* OR conference* OR "annual confer*" OR "payer* confer*" OR "payor* confer*" OR "corporate event*" OR "indus* event*" OR "payer* event*" OR "payor* event*" OR "executiv* event*") w/10AND ("OON" OR "out-of-network" OR "out of network" OR "outside the network" OR "outside of the network" OR "beyond the network" OR OOA OR "out of area" OR nonpar* OR "non-par*" OR noncontract* OR "non-contract*" OR uncontract* OR "un-contract*" OR repric* OR reimburs* OR meeting* OR conference* OR forum OR retreat* OR invitation* OR agenda* OR minute* OR notes OR transcript* OR presentation* OR slide* OR recording* OR "room assignment*" OR "table assignment*" OR audio* OR record* OR "audio record*" OR "video record*" OR video OR "visual record*" OR film* OR video* OR a.v. OR "a.v." OR av* OR "audio video*" OR audio-video* OR "audio-video*" OR audio-visual* OR "audio-visual*" OR "audio visual*" OR poll* OR "tabl* activit*" OR handout* OR hand-out* OR "hand out*" OR leave-behind* OR "leave behind*" OR packet* OR speech* OR "room assign*" OR "client* meet*" OR "customer* meet*" OR "compet* meet*" OR "compet* communicat*" OR "meet* with client*" OR "meet* with customer*" OR "met* with client*" OR "met* with customer*" OR "met* with compet*"))</u>
7.	<u>((((payer* OR payor* OR insurer* OR Aetna OR Cigna OR Elevance OR Humana OR UnitedHealth OR UnitedHealthcare OR UHG OR UHC OR UMR OR united healthcare OR u.h.g. OR u.h.c. OR uhcg OR u.h.c.g. OR "dental payer*" OR "dental payor*" OR insur* OR insurer* OR "insurance co*" OR TPA OR "t.p.a." OR "third-party administrat*" OR "third party administrat*" OR "self fund*" OR self-fund* OR meritain OR "meritain health, inc." OR "meritain health" OR "meritain health dispute resol*" OR cigna OR "the cigna group" OR "cigna group" OR "anthem blue cross of california" OR anthem OR "blue cross of california" OR "blue cross" OR BCCA OR "cigna health and life ins*" OR "healthscope benefits" OR healthscope OR "health scope" OR "healthscope benefits, inc." OR "UMR, inc." OR "UMR inc") w/10AND (implement* OR setting* OR custom* OR input* OR provide* OR require* OR upload* OR download* OR transfer* OR transmit* OR portal* OR protocol* OR public* OR disclos*)) w/10AND ("OON" OR "out-of-network" OR "out of network" OR repric* OR reimburs* OR payment* OR "contractual information" OR "claims data" OR "competitively sensitive" OR "commercially sensitive" OR csi OR confid* OR proprietar*))</u>

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8.	((("payment level*" OR "rate level*" OR (allowed w/3 amount*) OR (paid w/3 amount*) OR reimbursement* OR "claims pricing" OR (pricing w/3 OON) OR "out-of-network pricing" OR "pricing strateg*" OR "pricing change*" OR "payment strateg*" OR benchmark* OR percentile* OR claim*) w/10AND (payer* OR payor* OR insurer* OR Aetna OR Elevance OR Humana OR UnitedHealth OR UnitedHealthcare OR UHC OR UMR OR united healthcare OR u.h.g. OR u.h.c. OR uhcg OR u.h.c.g. OR "dental payer*" OR "dental payor*" OR insur* OR insurer* OR "insurance co*" OR TPA OR "t.p.a." OR "third-party administrat*" OR "third party administrat*" OR "self fund*" OR self-fund* OR meritain OR "meritain health, inc." OR "meritain health" OR "meritain health dispute resol*" OR cigna OR "the cigna group" OR "cigna group" OR "anthem blue cross of california" OR anthem OR "blue cross of california" OR "blue cross" OR BCCA OR "cigna health and life ins*" OR "healthscope benefits" OR healthscope OR "health scope" OR "healthscope benefits, inc." OR "UMR, inc." OR "UMR inc")) AND (shar* OR disclos* OR distribut* OR exchange* OR provid* OR compar* OR benchmark* OR sen* OR giv* OR gav* OR deliver* OR communicat* OR discuss* OR convers* OR tell* OR told* OR speak* OR spok* OR talk* OR phon* OR telephon* OR telephon* OR "tele-phon*" OR call* OR email* OR e-mail* OR "e-mail*" OR text* OR attach* OR feed* OR trad* OR met* OR meet*))
9.	((("payment level*" OR "rate level*" OR (allowed w/103 amount*) OR (paid w/103 amount*) OR reimbursement* OR "claims pricing" OR (pricing w/103 OON) OR "out-of-network pricing" OR "pricing strateg*" OR "pricing change*" OR "payment strateg*" OR benchmark* OR percentile* OR claim* OR payment* OR rat* OR level*) w/10AND (Elevance OR Humana OR UnitedHealth OR UnitedHealthcare OR UHG OR UHC OR UMR OR Cigna OR united healthcare OR u.h.g. OR u.h.c. OR uhcg OR u.h.c.g. OR "dental payer*" OR "dental payor*" OR insur* OR insurer* OR "insurance co*" OR TPA OR "t.p.a." OR "third-party administrat*" OR "third party administrat*" OR "self fund*" OR self-fund* OR meritain OR "meritain health, inc." OR "meritain health" OR "meritain health dispute resol*" OR "the cigna group" OR "cigna group" OR "anthem blue cross of california" OR anthem OR "blue cross of california" OR "blue cross" OR BCCA OR "cigna health and life ins*" OR "healthscope benefits" OR healthscope OR "health scope" OR "healthscope benefits, inc." OR "UMR, inc." OR "UMR inc")) AND (shar* OR disclos* OR distribut* OR exchange* OR provid* OR compar* OR benchmark* OR sen* OR giv* OR gav* OR deliver* OR communicat* OR discuss* OR convers* OR tell* OR told* OR speak* OR spok* OR talk* OR phon* OR telephon* OR telephon* OR "tele-phon*" OR call* OR email* OR e-mail* OR "e-mail*" OR text* OR attach* OR feed* OR trad* OR met* OR meet*))
10.	((agreement* OR contract* OR proposal* OR offer* OR pitch* OR negotiation* OR amend* OR "statement of work" OR SOW OR MOU OR MOA OR LOI OR "side letter*" OR "stmt* of work*") w/10AND (payer* OR payor* OR insurer* OR Aetna OR Cigna OR Elevance OR Humana OR UnitedHealth OR UnitedHealthcare OR UHG OR UHC OR UMR OR u.h.g. OR u.h.c. OR uhcg OR u.h.c.g. OR "dental payer*" OR "dental payor*" OR insur* OR insurer* OR "insurance co*" OR TPA OR "t.p.a." OR "third-party administrat*" OR "third party administrat*" OR "self fund*" OR self-fund* OR meritain OR "meritain health, inc." OR "meritain health" OR "meritain health dispute resol*" OR "the cigna group" OR "cigna group" OR "anthem blue cross of california" OR anthem OR "blue cross of california" OR "blue cross" OR BCCA OR "cigna health and life ins*" OR "healthscope benefits" OR healthscope OR "health scope" OR "healthscope benefits, inc." OR "UMR, inc." OR "UMR inc" AND ("OON"

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	OR "out-of-network" OR "out of network" OR reproc* OR reimburs* OR "outside the network" OR "outside of the network" OR "beyond the network" OR OOA OR "out of area" OR nonpar* OR "non-par*" OR noncontract* OR "non-contract*" OR uncontract* OR "un-contract*"))
11.	(((bal* w/ 103 bill*) OR "gap bill*" OR "deficien* claim*" OR "claim deficien*" OR "bill* the bal*" OR "balance* bill* navigat*" OR "bill* differen*" OR surpris* OR "surpris* act*") ANDw/10 ("OON" OR "out-of-network" OR "out of network" OR "outside the network" OR "outside of the network" OR "beyond the network" OR OOA OR "out of area" OR nonpar* OR "non-par*" OR noncontract* OR "non-contract*" OR uncontract* OR "un-contract*" OR reproc* OR reimburs*)) AND ((allowed w/ 103 amount*) OR (paid w/ 103 amount*) OR reimbursement* OR "payment level*" OR "rate level*" OR prevent* OR prohibit* OR limitation* OR abrasion OR estimate* OR projection* OR frequency OR rate* OR payment* OR rat* OR level*))
12.	((provider* OR physician* OR doctor* OR dentist* OR hospital* OR clinic* OR practice* OR chiro* OR practi* OR podiatr* OR psychotherap* OR therap* OR "mental health") ANDw/10 (appeal* OR negotiat ion * OR renegotiat ion * OR adjudicat* OR reject* OR accept* OR disput* OR submi* OR re-negotiat* OR "re-negotiat*" OR "re negotiat*" OR parameter* OR "appeal* parameter*" OR "appellat* parameter*" OR discuss* OR adjust* OR reten* OR "reten* rate*" OR "initial payment offer*" OR "original payment offer*" OR "inquiry rat*" OR "claims negotiat*" OR reprocess* OR re-process* OR "re-process*" OR "re process*" OR "best and final" OR "final and best" OR "negotiat* discount*" OR post-reproc* OR "post-reproc*" OR "post reproc*")) AND ("OON" OR "out-of-network" OR "out of network" OR "outside the network" OR "outside of the network" OR "beyond the network" OR OOA OR "out of area" OR nonpar* OR "non-par*" OR noncontract* OR "non-contract*" OR uncontract* OR "un-contract*" OR reproc* OR reimburs*))
13.	((analy* OR study OR studies OR report* OR projection* OR estimate* OR model* OR "price change*" OR "pricing trend*" OR "provider reaction*" OR "switch*" OR hat* OR dislik* OR frown* OR discourag* OR "do not like" OR "don't like" OR "do not want*" OR "don't want*" OR fair OR "not fair" OR unfair OR cancel* OR "switch off" OR "switch away" OR "switch from" OR "transition away" OR "transition from" OR "end* use" OR "end* our use" OR "mov* away" OR nonrenew* OR non-renew* OR "not renew*" OR "provider react*" OR unsubscri* OR "un subscri*" OR "stop* "subscri*" OR "Medicare" OR "Medicaid" OR "Tricare") ANDw/10 ("OON" OR "out-of-network" OR "out of network" OR reproc* OR reimburs* OR "claims pricing" OR (pricing w/503 OON) OR "OON pricing" OR "out-of-network pricing" OR "outside the network" OR "outside of the network" OR "beyond the network" OR OOA OR "out of area" OR nonpar* OR "non-par*" OR noncontract* OR "non-contract*" OR uncontract* OR "un-contract*"))
14.	((analy* OR study OR studies OR report* OR projection* OR estimate* OR model* OR "price change*" OR "pricing trend*" OR "provider reaction*" OR "switch*" OR hat* OR dislik* OR frown* OR discourag* OR "do not like" OR "don't like" OR "do not want*" OR "don't want*" OR fair OR "not fair" OR unfair OR cancel* OR switch* OR "switch off" OR "switch away" OR "switch from" OR "transition away" OR "transition from" OR "end* use" OR "end* our use" OR "mov* away" OR nonrenew* OR non-renew* OR "not renew*" OR "provider react*" OR unsubscri* OR "un subscri*" OR "stop* "subscri*" OR "Medicare" OR "Medicaid" OR "Tricare") w/10AND ((allowed w/ 503 amount*) OR (paid w/ 503 amount*) OR reimbursement* OR "payment level*" OR "rate level*" OR (pric e w/ 503 elastici*)))

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15.	((("market share" OR "market presence" OR "market size" OR "market analysis" OR "market payer" OR "competitive position" OR "geographic scope" OR "geographic reach" OR compet* OR "geograph* adjust*" OR "geograph* area*" OR barrier* OR entr* OR grow* OR expan* OR "absence of compet*" OR "lack of compet*" OR "lessened compet*") w/10AND (payer* OR payor* OR insurer* OR Aetna OR Cigna OR Elevance OR Humana OR UnitedHealth OR UnitedHealthcare OR insurer* OR united healthcare OR u.h.g. OR u.h.c. OR uhcg OR u.h.c.g. OR "dental payer*" OR "dental payor*" OR insur* OR insurer* OR "insurance co*" OR TPA OR "t.p.a." OR "third-party administrat*" OR "third party administrat*" OR "self fund*" OR self-fund* OR meritain OR "meritain health, inc." OR "meritain health" OR "meritain health dispute resol*" OR cigna OR "the cigna group" OR "cigna group" OR "anthem blue cross of california" OR anthem OR "blue cross of california" OR "blue cross" OR BCCA OR "cigna health and life ins*" OR "healthscope benefits" OR healthscope OR "health scope" OR "healthscope benefits, inc." OR "UMR, inc." OR "UMR inc" OR UMR) AND ("OON" OR "out-of-network" OR "out of network" OR reproc* OR reimburs* OR "outside the network" OR "outside of the network" OR "beyond the network" OR OOA OR "out of area" OR nonpar* OR "non-par*" OR noncontract* OR "non-contract*" OR uncontract* OR "un-contract*"))
16.	((("market share" OR "market presence" OR "market size" OR "market analysis" OR "market payer" OR "competitive position" OR "geographic scope" OR "geographic reach" OR compet* OR "geograph* adjust*" OR "geograph* area*" OR barrier* OR entr* OR grow* OR expan* OR "absence of compet*" OR "lack of compet*" OR "lessened compet*") w/10AND (UHG OR UHC OR UMR OR client* OR customer* OR payer* OR payor* OR Aetna OR Cigna OR Elevance OR Humana OR UnitedHealth OR UnitedHealthcare OR united healthcare OR u.h.g. OR u.h.c. OR uhcg OR u.h.c.g. OR "dental payer*" OR "dental payor*" OR insur* OR insurer* OR "insurance co*" OR TPA OR "t.p.a." OR "third-party administrat*" OR "third party administrat*" OR "self fund*" OR self-fund* OR meritain OR "meritain health, inc." OR "meritain health" OR "meritain health dispute resol*" OR "the cigna group" OR "cigna group" OR "anthem blue cross of california" OR anthem OR "blue cross of california" OR "blue cross" OR BCCA OR "cigna health and life ins*" OR "healthscope benefits" OR healthscope OR "health scope" OR "healthscope benefits, inc." OR "UMR, inc." OR "UMR inc") AND ("OON" OR "out-of-network" OR "out of network" OR reproc* OR reimburs* OR "outside the network" OR "outside of the network" OR "beyond the network" OR OOA OR "out of area" OR nonpar* OR "non-par*" OR noncontract* OR "non-contract*" OR uncontract* OR "un-contract*"))
17.	((("transparency in coverage" OR "TIC Rule" OR "T.I.C. Rule*" OR tic OR t.i.c. OR "t.i.c." OR t-i-c OR "t-i-c" OR "transparency in coverage rule*" OR "tic rule*" OR "t-i-c rule*" OR "machine-readable file*" OR mrf OR m.r.f. OR "m.r.f." OR m-r-f OR "m-r-f" OR compl* OR "tic mrf files" OR "t.i.c. m.r.f." OR "mrf creat*" OR "m.r.f. creat*")) AND w/10 (compl* OR disclosure* OR public* OR payment* OR "contractual information" OR "claims data" OR payer* OR payor* OR insurer* OR Aetna OR Cigna OR Elevance OR Humana OR UnitedHealth OR UnitedHealthcare OR UHG OR UHC OR UMR OR united healthcare OR u.h.g. OR u.h.c. OR uhcg OR u.h.c.g. OR "dental payer*" OR "dental payor*" OR insur* OR insurer* OR "insurance co*" OR TPA OR "t.p.a." OR "third-party administrat*" OR "third party administrat*" OR "self fund*" OR self-fund* OR meritain OR "meritain health, inc." OR "meritain health" OR "meritain health dispute resol*" OR cigna OR "the cigna group" OR "cigna group" OR "anthem blue cross of california" OR anthem OR "blue cross of california" OR "blue cross" OR

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	<u>BCCA OR "cigna health and life ins*" OR "healthscope benefits" OR healthscope OR "health scope" OR "healthscope benefits, inc." OR "UMR, inc." OR "UMR inc") AND ("OON" OR "out-of-network" OR "out of network" OR reprec* OR "outside the network" OR "outside of the network" OR "beyond the network" OR OOA OR "out of area" OR nonpar* OR "non-par*" OR noncontract* OR "non-contract*" OR uncontract* OR "un-contract*" OR reimburs*))</u>
18.	<u>((conspir* OR co-conspir* OR cartel* OR collu* OR coordinat* OR agree* OR align* OR antitrust* OR "anti-trust*" OR anticompet* OR "anti-compet*" OR "information shar*" OR "data shar*") AND (payer* OR payor* OR Aetna OR Cigna OR Elevance OR UnitedHealthcare OR UHG OR UHC OR UMR OR HealthScope OR Anthem OR Zelis OR reprec* OR client* OR customer* OR Humana OR UnitedHealth OR united healthcare OR u.h.g. OR u.h.c. OR uhcg OR u.h.c.g. OR "dental payer*" OR "dental payor*" OR insur* OR insurer* OR "insurance co*" OR TPA OR "t.p.a." OR "third-party administrat*" OR "third party administrat*" OR "self fund*" OR self-fund* OR meritain OR "meritain health, inc." OR "meritain health" OR "meritain health dispute resol*" OR cigna OR "the cigna group" OR "cigna group" OR "anthem blue cross of california" OR "blue cross of california" OR "blue cross" OR BCCA OR "cigna health and life ins*" OR "healthscope benefits" OR healthscope OR "health scope" OR "healthscope benefits, inc." OR "UMR, inc." OR "UMR inc")</u>
19.	<u>((know* OR knew* OR understand* OR recogniz* OR consider* OR assess* OR evaluat* OR analy* OR concern* OR discuss* OR communicat*) AND (OON OR "out-of-network" OR "out of network" OR reprec* OR reimburs* OR "claims pricing" OR Zelis OR payer* OR payor* OR insurer*))</u>
20.	<u>((role* OR responsib* OR assign* OR delegat* OR supplant* OR authori* OR capacit* OR own* OR operat* OR manag* OR supervis* OR control* OR relinquish* OR entrust* OR ced*) AND (OON OR "out-of-network" OR reprec* OR "claims pricing" OR payer* OR payor* OR insurer* OR Zelis))</u>
21.	<u>((Ingenix OR "Fair Health" OR fairhealth OR UCR OR "usual and customary" OR "usual, customary and reasonable" OR "reasonable and customary" OR "market rat*") AND (OON OR "out-of-network" OR reprec* OR reimburs* OR pric* OR rate* OR benchmark* OR databas*))</u>
22.	<u>((investigat* OR "department of justice" OR DOJ OR "federal trade commission" OR FTC OR "department of labor" OR DOL OR "grand jur*" OR "civil investigat* demand*" OR CID OR "state investigat*") AND (Zelis OR OON OR "out-of-network" OR reprec* OR payer* OR payor* OR insurer* OR antitrust* OR compet*))</u>
23.	<u>(director* OR consult* OR advisor* OR adviser* OR "board member*" OR member* OR board* OR "board meet*" OR "advisor* board" OR "adviser* board" OR itenerar* OR "advisor* committee*" OR "adviser* committee*" OR "committee advis*" OR "board advisor*" OR "director* advisor*" OR "director* adviser*" OR "meet* notes" OR minute* OR veto* OR vote* OR "board consult*" OR "consult* to the board*" OR "strategic advi*") AND (Zelis OR Zellis OR Zeliious OR Zellious OR Zelius OR Zellius OR Zealous OR zelis.com OR "zelis.com")</u>
24.	<u>(percent* OR pct* OR % OR amount* OR ceiling* OR cap* OR caps OR floor* OR threshold* OR threshhold* OR thresh-hold* OR "thresh-hold*" OR "thresh hold*" OR cliff* OR crater*</u>

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	<u>OR limit* OR fix* OR set* OR default* OR de-fault* OR "de fault*" OR initial* OR original* OR list* OR "no more than" OR "no less than" OR "more than" OR "less than" OR "higher rat*" OR "lower rat*" OR "original* pa* amount*" OR "initial* pa* amount*" OR mac OR "m.a.c." OR "max* allow* charg*" OR "max* allow* cost*" OR "max* allow* reimburs*" OR "allow* amount*" OR "amount* allow*" OR "reimburs* level*" OR "level of reimburs*") AND ("out of network" OR OON OR "out of area" OR OOA OR NonPar* OR Non-Par* OR "outside the network" OR "outside of the network" OR "beyond the network" OR "out of network" OR "out-of-network" OR OON OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR "non-par*" OR non-contract* OR noncontract* OR "non contract*" OR "out-of-network sol*" OR "out of network sol*" OR "end-to-end cost contain*" OR "un contract*" OR uncontract* OR "un-contract*" OR "zelis contract*")</u>
25.	<u>("payment* harmon* ind*" OR phi OR p.h.i. OR "p.h.i." OR quickrepic* OR "quick repic*" OR quick-repic* OR "quick-repic*" OR network360 OR "network 360" OR network-360 OR "network-360" OR "zelis pric* map*" OR "open access pric*" OR "intel* pric* platform*" OR zipp OR z.i.p.p. OR "z.i.p.p." OR "oon sol*" OR "out of network sol*" OR "out-of-network sol*" OR "o.o.n. sol*" OR "o-o-n sol*" OR "onet sol*" OR "o-net sol*" OR "o net sol*")</u>
26.	<u>((Stratose OR PHX OR "Pay-Plus Solutions" OR "Pay Plus Solutions" OR Truven OR Ethicare OR Strenuus OR Maverest OR NetMinder OR RedCard OR "Sapphire Digital" OR "Saphire Digital" OR PayerCompass OR PaySpan OR Medxoom OR Qualident OR HFN OR PPOPlus OR "4Most Health" OR "4Most Dental" OR 4Comp) AND (acqui* OR merger* OR affiliat* OR subsid* OR partner* OR owner* OR operat* OR manag* OR control* OR invest* OR OON OR repic*))</u>
27.	<u>((performance w/50 review*) OR (performance w/50 evaluat*) OR promotion* OR bonus* OR incentiv* OR compensat* OR commission*) AND (OON OR "out-of-network" OR repic* OR reimburs* OR "claims pricing" OR sav* OR out of network OR OON OR out of area OR OOA OR NonPar* OR Non-Par* OR "out of network" OR "outside the network" OR "outside of the network" OR "beyond the network" OR "out of network" OR "out-of-network" OR OON OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR "non-par*" OR non-contract* OR noncontract* OR "non contract*" OR "out-of-network sol*" OR "out of network sol*" OR "end-to-end cost contain*" OR "un contract*" OR uncontract* OR "un-contract*" OR "zelis contract*")</u>
28.	<u>((profit* OR earning* OR revenu* OR income* OR EBITDA OR debt* OR credit* OR loan* OR financ* OR sav*) AND (Zelis OR OON OR "out-of-network" OR repic* OR "claims pricing" OR payer* OR payor* OR insurer*))</u>
29.	<u>((Aetna OR Meritain OR "Meritain Health" OR "Meritain Health, Inc.") AND (Zelis OR OON OR "out-of-network" OR repic* OR reimburs* OR "claims pricing" OR ERS OR RBP OR "claims data" OR "competitively sensitive" OR shar* OR exchang* OR coordinat*))</u>
30.	<u>((Cigna OR "The Cigna Group" OR "Cigna Group" OR "Cigna Health and Life Ins*") AND (Zelis OR OON OR "out-of-network" OR repic* OR reimburs* OR "claims pricing" OR ERS OR RBP OR "claims data" OR "competitively sensitive" OR shar* OR exchang* OR coordinat*))</u>

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31.	<u>((Elevance OR Anthem OR "Blue Cross" OR "Blue Cross of California" OR BCCA) AND (Zelis OR OON OR "out-of-network" OR reproc* OR reimburs* OR "claims pricing" OR ERS OR RBP OR "claims data" OR "competitively sensitive" OR shar* OR exchange* OR coordinat*))</u>
32.	<u>((Humana) AND (Zelis OR OON OR "out-of-network" OR reproc* OR reimburs* OR "claims pricing" OR ERS OR RBP OR "claims data" OR "competitively sensitive" OR shar* OR exchange* OR coordinat*))</u>
33.	<u>((UnitedHealth OR UnitedHealthcare OR UHG OR UHC OR UMR OR HealthScope OR "HealthScope Benefits") AND (Zelis OR OON OR "out-of-network" OR reproc* OR reimburs* OR "claims pricing" OR ERS OR RBP OR "claims data" OR "competitively sensitive" OR shar* OR exchange* OR coordinat*))</u>
34.	<u>((Aetna OR Meritain OR Cigna OR Elevance OR Anthem OR Humana OR UnitedHealth OR UnitedHealthcare OR UHG OR UHC OR UMR OR HealthScope) AND (conspir* OR collu* OR coordinat* OR align* OR agree* OR compet* OR antitrust* OR anticompet* OR "information shar*" OR "data shar*")) AND (Zelis OR OON OR "out-of-network" OR reproc* OR reimburs* OR "claims pricing"))</u>
35.	<u>(Bain OR "Bain Capital" OR Parthenon OR "Parthenon Capital" OR Mubadala OR "Mubadala Investment Company" OR HarbourVest OR HarborVest OR Guidehouse OR "Office Ally" OR "private equity" OR invest* OR loan* OR credit*) AND (Zelis OR Zellis OR Zelious OR Zellious OR Zeliu OR Zellius OR Zealous OR zelis.com OR "zelis.com" OR control* OR leverag* OR steer* OR oblig* OR dictat* OR restrict*) AND (out of network OR OON OR out of area OR OOA OR NonPar* OR Non-Par* OR "out of network" OR "outside the network" OR "outside of the network" OR "beyond the network" OR "out of network" OR "out-of-network" OR OON OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR "non-par*" OR non-contract* OR noncontract* OR "non contract*" OR "out-of-network sol*" OR "out of network sol*" OR "end-to-end cost contain*" OR "un contract*" OR uncontract* OR "un-contract*" OR "zelis contract*"))</u>
36.	<u>("500 health*" OR "750 health*" OR "770 health*" OR "500 insur*" OR "750 insur*" OR "770 insur*" OR "500 nat*" OR "750 nat*" OR "500 payor*" OR "750 payor*" OR "770 payor*" OR "500 payer*" OR "750 payer*" OR "770 payer*" OR "500 client*" OR "750 client*" OR "770 client*" OR "500 customer*" OR "750 customer*" OR "770 customer*" OR "500 repricing client*" OR "750 repricing client*" OR "770 repricing client*" OR "500 repricing customer*" OR "750 repricing customer*" OR "770 repricing customer*" OR "repricing client*" OR "repricing customer*" OR "top five" OR "top-five" OR "top 5" OR "five top" OR "5 top" OR "largest five" OR "largest 5" OR "five largest" OR "5 largest" OR "biggest five" OR "biggest 5" OR "five biggest" OR "5 biggest")</u>
37.	<u>(500 OR "five hundred" OR five-hundred OR "five-hundred" OR 750 OR "seven hundred fifty" OR seven-hundred-fifty OR "seven-hundred-fifty" OR 770 OR "seven hundred seventy" OR seven-hundred-seventy OR "seven-hundred-seventy" OR "top 5" OR top-5 OR "top-5" OR "top five" OR top-five OR "top-five")</u>
38.	<u>(report* OR data* OR "quant* survey*" OR generat* OR writ* OR draft* OR summar* OR author* OR explain* OR present* OR memo* OR artic* OR document* OR "doc*" OR ".doc")</u>

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	<u>OR ".docx" OR "white paper*" OR whitepaper* OR white-paper* OR powerpoint* OR power-point* OR "power-point*" OR ppt* OR .ppt OR ".ppt" OR blog* OR websit* OR web-sit* OR "web-sit*" OR "web sit*" OR media OR deliverab* OR metric* OR scor* OR index OR indic* OR dashboard* OR dash-board* OR "dash board*" OR stud* OR projection* OR estimat* OR model*) AND ("out of network" OR OON OR "out of area" OR OOA OR NonPar* OR Non-Par* OR "outside the network" OR "outside of the network" OR "beyond the network" OR "out of network" OR "out-of-network" OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR "non-par*" OR non-contract* OR noncontract* OR "non contract*" OR "out-of-network sol*" OR "out of network sol*" OR "end-to-end cost contain*" OR "un contract*" OR uncontract* OR "un-contract*" OR "zelis contract*")</u>
39.	<u>("independent database*" OR "not-for-profit compan*" OR "not for profit compan*" OR "non-profit compan*" OR "non profit compan*" OR "fair health" OR "five year*" OR five-year* OR "five yr*" OR five-yr* OR "5 year*" OR 5-year* OR "5 yr*" OR 5-yr* OR "exclus* period*" OR "exclus* term*" OR "exclus* us*" OR "fair market*" OR "reasonable and customary" OR "r and c" OR "r & c" OR "usual, customary and reasonable" OR "usual, customary, and reasonable" OR ucr OR u.c.r. OR ucr OR u.c.r. OR "usual, customary & reasonable" OR "customary & reasonable" OR "customary and reasonable" OR "usual and customary" OR "usual & reasonable" OR "usual & customary" OR "market rat*")</u>
40.	<u>("claim* pass*" OR claimpass OR claim-pass* OR "claim-pass*" OR cps OR c.p.s. OR "c.p.s." OR csps OR c.s.p.s. OR "c.s.p.s." OR "supp* network* serv*" OR "accelerat* pa*" OR "ap program*" OR "a.p. program*" OR "ap network*" OR "a.p. network*" OR "medical reimbursement analysis service*" OR "professional negotiat* serv*" OR "prof'l negotiat* serv*" OR pns OR p.n.s. OR "p.n.s." OR ppns OR p.p.n.s. OR "p.p.n.s." OR "continuous discount* agreement*" OR cda OR c.d.a. OR "c.d.a.")</u>
41.	<u>(pric* OR cost* OR expen* OR amount* OR level* OR repric* OR re-pric* OR "re pric*" OR paid* OR pay* OR payment* OR satisf* OR settl* OR assur* OR discontinu* OR "executive law*" OR ceas* OR desist* OR "exclusiv* us*" OR exclusive-us* OR exclusiv* OR "five year*" OR five-year* OR "five-year*" OR "five yr*" OR five-yr* OR "five-yr*" OR "5 year*" OR 5-year* OR "5-year*" OR "5 yr*" OR 5-yr* OR "5-yr*" OR increas* OR revers* OR climb* OR "26%" OR "13%")</u>
42.	<u>((compet* OR Aetna OR Cigna OR Elevance OR UnitedHealth OR United Health OR UHG OR payer* OR payor* OR "dental payer*" OR "dental payor*" OR insur* OR "insurance co*" OR TPA OR "t.p.a." OR "third-party administrat*" OR "third party administrat*" OR "self fund*" OR self-fund* OR zelis OR zelis.com OR meritain OR "meritain health, inc." OR "meritain health" OR "meritain health dispute resol*" OR "the cigna group" OR "cigna group" OR humana OR united* OR "united health" OR unitedhealthgroup OR "unitedhealth group" OR "united healthgroup" OR "united healthcare" OR unitedhealthcare OR UHG OR "u.h.g." OR UHC OR "u.h.c." OR UHCG OR "u.h.c.g." OR "anthem blue cross of california" OR anthem OR "blue cross of california" OR "blue cross" OR BCCA OR "cigna health and life ins*" OR "healthscope benefits" OR healthscope OR "health scope" OR "healthscope benefits, inc." OR "UMR, inc." OR "UMR inc" OR UMR) AND ("out of network" OR OON OR out of area OR OOA OR NonPar* OR Non-Par* OR "outside the network" OR "outside of the network" OR "beyond the network" OR "out of network" OR "out-of-network" OR OON OR o-o-n OR</u>

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	<u>"o.o.n." OR onet OR "o-net*" OR "o net*" OR "non-par*" OR non-contract* OR noncontract* OR "non contract*" OR "out-of-network sol*" OR "out of network sol*" OR "end-to-end cost contain*" OR "un contract*" OR uncontract* OR "un-contract*" OR "zelis contract*")) AND (terminat* OR fire OR fired OR firing OR disciplin* OR suspen* OR reprimand* OR violat* OR review* OR eval* OR assess* OR hir* OR promot* OR demot* OR resign* OR incentiv* OR rais*)</u>
43.	<u>((compet* OR Aetna OR Cigna OR Elevance OR UnitedHealth OR United Health OR UHG OR payer* OR payor* OR "dental payer*" OR "dental payor*" OR insur* OR "insurance co*" OR TPA OR "t.p.a." OR "third-party administrat*" OR "third party administrat*" OR "self fund*" OR self-fund* OR zelis OR zelis.com OR meritain OR "meritain health, inc." OR "meritain health" OR "meritain health dispute resol*" OR "the cigna group" OR "cigna group" OR humana OR united* OR "united health" OR unitedhealthgroup OR "unitedhealth group" OR "united healthgroup" OR "united healthcare" OR unitedhealthcare OR UHG OR "u.h.g." OR UHC OR "u.h.c." OR UHCG OR "u.h.c.g." OR "anthem blue cross of california" OR anthem OR "blue cross of california" OR "blue cross" OR BCCA OR "cigna health and life ins*" OR "healthscope benefits" OR healthscope OR "health scope" OR "healthscope benefits, inc." OR "UMR, inc." OR "UMR inc" OR UMR) AND (Zelis OR Zellis OR Zelious OR Zellious OR Zelius OR Zellius OR Zealous OR zelis.com OR "zelis.com" OR @zelis OR "@zelis" OR @zelis.com OR "@zelis.com")) AND (terminat* OR fire OR fired OR firing OR disciplin* OR suspen* OR reprimand* OR violat* OR review* OR eval* OR assess* OR hir* OR promot* OR demot* OR resign* OR incentiv* OR rais*)</u>
44.	<u>(profit* OR earning* OR "net earning*" OR incom* OR "net incom*" OR revenu* OR net revenu* OR money* OR monet* OR currenc* OR dollar* OR usd OR u.s.d. OR "u.s.d." OR "financial health*" OR "in the red" OR "in the black" OR "in the money" OR cash* OR "cash equivalent*" OR holding* OR invest* OR "short term" OR short-term OR "long term" OR long-term OR saving* OR sav* OR "earnings before income tax, depreciation*" OR ebitda OR e.b.i.t.d.a. OR "e.b.i.t.d.a." OR gaap OR g.a.a.p. OR "g.a.a.p." OR amoun* OR amt OR debt* OR credit* OR oblig* OR loan* OR facilit* OR ow* OR mortgag*) AND ("out of network" OR OON OR "out of area" OR OOA OR NonPar* OR Non-Par* OR "outside the network" OR "outside of the network" OR "beyond the network" OR "out of network" OR "out-of-network" OR OON OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR "non-par*" OR non-contract* OR noncontract* OR "non contract*" OR "out-of-network sol*" OR "out of network sol*" OR "end-to-end cost contain*" OR "un contract*" OR uncontract* OR "un-contract*" OR "zelis contract*")</u>
45.	<u>(disput* OR appeal* OR adjudicat* OR submi* OR accept* OR reject* OR negotiat* OR renegotiat* OR re-negotiat* OR "re-negotiat*" OR "re negotiat*" OR parameter* OR "appeal* parameter*" OR "appellat* parameter*" OR discuss* OR adjust* OR reten* OR "reten* rate*" OR "initial payment offer*" OR "original payment offer*" OR "inquiry rat*" OR "claims negotiat*" OR reprocess* OR re-process* OR "re-process*" OR "re process*" OR "best and final" OR "final and best" OR "negotiat* discount*" OR post-repric* OR "post-repric*" OR "post repric*") AND ("out of network" OR OON OR "out of area" OR OOA OR NonPar* OR Non-Par* OR "outside the network" OR "outside of the network" OR "beyond the network" OR "out of network" OR "out-of-network" OR OON OR o-o-n OR "o.o.n." OR</u>

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	<u>onet OR "o-net*" OR "o net*" OR "non-par*" OR non-contract* OR noncontract* OR "non contract*" OR "out-of-network sol*" OR "out of network sol*" OR "end-to-end cost contain*" OR "un contract*" OR uncontract* OR "un-contract*" OR "zelis contract*")</u>
46.	<u>("national advantage program*" OR "nat'l advantage program*" OR "natl* advantage program*" OR nap OR n.a.p. OR "n.a.p." OR "national advantage" OR "nat'l advantage" OR "natl* advantage*" OR "nationwide advantage*" OR "administrative service agree*" OR asas OR a.s.a.s. OR "a.s.a.s." OR asa OR a.s.a. OR "a.s.a." OR "claim* pass*" OR claimpass OR claim-pass* OR "claim-pass*" OR cps OR c.p.s. OR "c.p.s." OR csps OR c.s.p.s. OR "c.s.p.s." OR "supp* network* serv*" OR "accelerat* pa*" OR "ap program*" OR "a.p. program*" OR "ap network*" OR "a.p. network*" OR "medical reimbursement analysis service*" OR "professional negotiat* serv*" OR "prof'l negotiat* serv*" OR pns OR p.n.s. OR "p.n.s." OR ppns OR p.p.n.s. OR "p.p.n.s." OR "continuous discount* agreement*" OR cda OR c.d.a. OR "c.d.a.")</u>
47.	<u>((pacific AND inpatient) OR pacific inpatient medical group OR pimg OR p.i.m.g. OR pacific)</u>
48.	<u>((Frank AND Scaccia) OR scaccia)</u>
49.	<u>((Dennis AND Ayer) OR Ayer DDS OR ayer)</u>
50.	<u>("ethan ciment" OR "ciment" OR "chelsea foot and ankle p.c." OR chelsea OR "chelsea foot")</u>
51.	<u>(Bachoua AND (Dan* OR chiro*)) OR ((dbc OR d.b.c. AND chiro*) OR bachoua OR dbc OR d.b.c.)</u>
52.	<u>("4 missing peace" OR "4 missing peace corps, Inc." OR "the missing peace center" OR "missing peace" OR "rhodes-levin" OR "chris laurence" OR Laurence)</u>
53.	<u>(Availity OR availity OR avail* OR AHIP OR America* Health Insurance Plan* OR a.h.i.p. OR "a.h.i.p." OR "america's health insurance plan*" OR "american health insurance plan*" OR "america* health ins* plan*") AND ("strategic partner" OR partner* OR strateg* OR Zelis OR Zellis OR Zelious OR Zellious OR Zelius OR Zellius OR Zealous OR zelis.com OR "zelis.com")</u>
54.	<u>("payment* harmon* ind*" OR phi OR p.h.i. OR "p.h.i." OR quickrepic* OR "quick repic*" OR quick-repic* OR "quick-repic*" OR network360 OR "network 360" OR network-360 OR "network-360" OR "zelis pric* map*" OR "open access pric*" OR "intel* pric* platform*" OR zipp OR z.i.p.p. OR "z.i.p.p." OR "oon sol*" OR "out of network sol*" OR "out-of-network sol*" OR "o.o.n. sol*" OR "o-o-n sol*" OR "onet sol*" OR "o-net sol*" OR "o net sol*")</u>
55.	<u>(("Zelis Forum" OR zelis conference OR zelis retreat OR "client* confer*" OR "customer* confer*" OR "annual confer*" OR fora* OR "lost pines resort" OR "lost pines resort and spa" OR "lost pines resort & spa" OR "hyatt regency lost pines resort and spa" OR "hyatt regency lost pines resort & spa" OR hyatt OR regency OR resort* OR "lost pines" OR "boca raton" OR retreat* OR conference* OR "annual confer*" OR "payer* confer*" OR "payor* confer*" OR "corporate event*" OR "indus* event*" OR "payer* event*" OR "payor* event*" OR "executiv* event*") AND (payer* OR payor* OR insurer* OR Aetna OR Cigna OR Elevance OR Humana OR UnitedHealth OR UnitedHealthcare OR UHC OR UMR OR united healthcare OR u.h.g. OR u.h.c. OR uhcg OR u.h.c.g. OR "dental payer*" OR "dental payor*" OR insur* OR</u>

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	<u>insurer* OR "insurance co*" OR TPA OR "t.p.a." OR "third-party administrat*" OR "third party administrat*" OR "self fund*" OR self-fund* OR meritain OR "meritain health, inc." OR "meritain health" OR "meritain health dispute resol*" OR cigna OR "the cigna group" OR "cigna group" OR "anthem blue cross of california" OR anthem OR "blue cross of california" OR "blue cross" OR BCCA OR "cigna health and life ins*" OR "healthscope benefits" OR healthscope OR "health scope" OR "healthscope benefits, inc." OR "UMR, inc." OR "UMR inc" OR repricer* OR Availity OR availity OR avail* OR AHIP OR America* Health Insurance Plan* OR a.h.i.p. OR "a.h.i.p." OR "america's health insurance plan*" OR "american health insurance plan*" OR "america* health ins* plan*")</u>
56.	<u>(violat* OR antitrust* OR anti-trust OR conspir* OR coconspir* OR co-conspir* OR co conspir* OR collud* OR cartel* OR fix* OR coordinat* OR anti-compet* OR anticompet* OR compet* OR "trade regulation*" OR regulat* OR handbook* OR hand-book* OR "hand book*" OR manual* OR "antitrust train*" OR "anti-trust train*" OR "antitrust guid*" OR "anti-trust guid*" OR "sherman act" OR "section 1" OR "sec. 1" OR "15 u.s.c. § 1" OR "clayton act" OR "section 16" OR "sec. 16" OR "15 u.s.c. § 26") AND (Zelis* OR zelis.com OR ERS OR established reimbursement schedule OR established reimbursement solution OR reference based pric* OR "e.r.s." OR e-r-s OR "e-r-s" OR "est* reimburs* schedul*" OR "fee schedul*" OR "est* reimburs* service*" OR "est* reimburs* sol*" OR Reference* Based Pricing OR RBP OR reference-bas* pric* OR reference bas* pric* OR referenced bas* pric* OR r.b.p. OR "r.b.p." OR r-b-p OR "r-b-p")</u>
57.	<u>(antitrust OR anti-trust OR "trade regulation*" OR regulat* OR handbook* OR hand-book* OR "hand book*" OR manual* OR "antitrust train*" OR "anti-trust train*" OR "antitrust guid*" OR "anti-trust guid*" OR "antitrust publi*" OR "anti-trust publi*" OR "antitrust email*" OR "anti-trust email*" OR "anti-trust e-mail*" OR "anti-trust e-mail*" OR "antitrust protocol*" OR "anti-trust protocol*" OR "authorit* on antitrust" OR "authorit* on anti-trust" OR "antitrust author*" OR "anti-trust author*" OR "antitrust report*" OR "anti-trust report*" OR "sherman act" OR "section one" OR "section 1" OR "sec. one" OR "sec. 1" OR "§ one" OR "§ 1" OR "15 u.s.c. section one" OR "15 u.s.c. section 1" OR "15 u.s.c. sec. one" OR "15 u.s.c. sec. 1" OR "15 u.s.c. § one" OR "15 u.s.c. § 1" OR "clayton act" OR "section sixteen" OR "section 16" OR "sec. sixteen" OR "sec. 16" OR "§ 16" OR "15 u.s.c. section twenty-six" OR "15 u.s.c. section twenty six" OR "15 u.s.c. section 26" OR "15 u.s.c. sec. twenty-six" OR "15 u.s.c. sec. twenty six" OR "15 u.s.c. sec. 26" OR "15 u.s.c. § twenty-six" OR "15 u.s.c. § twenty six" OR "15 u.s.c. § 26" OR "§ 26")</u>
58.	<u>("health maintenance org*" OR "health maintenance network*" OR hmo* OR "h.m.o." OR "health management org*" OR "health mgmt. org*" OR "health mgmt org*")</u>
59.	<u>(freedom* OR flex* OR choic* OR choos* OR "pa* more" OR compens* OR "pay more" OR "paid more" OR "pays more" OR "paying more" OR "increas* payment*" OR "increas* benefi*" OR "greater benefi*" OR "pa* less" OR "decreas* pa*" OR "decreas* benefi*" OR "smaller benefi*" OR "less cover*" OR "more cover*" OR "smaller rat*" OR "greater rat*" OR "decreas* rat*")</u>

Search No.	Plaintiffs' 8/25/26 Revisions and Additions to Zelis' 7/1/26 Proposed Search Terms
60.	<u>("market rat*" OR market-rat* OR "full rat*" OR "compet* rat*" OR invoic* OR "full invoic*" OR "as invoic*" OR "as-invoic*" OR "market pric*" OR "full pric*" OR market*)</u>
61.	<u>("zelis ppo*" OR "zelis p.p.o." OR "zelis preferred provider org*" OR "ppo network*" OR "p.p.o. network*" OR "wrap network*" OR "rental network*" OR "supplement* network*" OR stratose OR strat-ose OR "strat-ose" OR stratrose OR strat-rose OR "strat-rose" OR hfn OR h.f.n. OR "h.f.n." OR "hfn, llc" OR "hfn llc" OR "h.f.n., l.l.c." OR "h.f.n. l.l.c." OR "hfn, l.l.c." OR "hfn l.l.c." OR "h.f.n., llc" OR "h.f.n. llc" OR "maverest dental network*" OR "maverest*" OR "mavarest*" OR "mavarast*" OR maverast* OR mdn OR m.d.n. OR "m.d.n." OR m-d-n OR "m-d-n" OR ppoplus OR p.p.o.plus OR "p.p.o.plus" OR ppo-plus OR "ppo-plus" OR "ppo plus" OR "p.p.o. plus" OR qualident OR quali-dent OR "quali-dent" OR "quali dent*" OR "4most health" OR 4mosthealth OR "4 most health" OR "4most dental" OR "4 most dental" OR 4mostdental OR 4comp OR "4 comp" OR "zelis compet*" OR "zelis' compet*" OR "compet* of zelis" OR "compet* with zelis" OR "compet* to zelis" OR "abl* to compet*" OR "abil* to compet*" OR "can compet*" OR "will compet*" OR "no longer compet*" OR "still compet*" OR "zelis is a payer*" OR "zelis is a payor*" OR "payer* include* zelis" OR "payor* include* zelis" OR "zelis as a payer*" OR "Zelis as a payor*" OR "as a payer, Zelis" OR "as a payor, Zelis" OR (zelis AND pay*) OR "purcha* OON" OR "purcha* o.o.n." OR "purcha* out-of-network" OR "purcha* non-par*" OR "purcha* non par*" OR "purcha* not par*" OR "bought oon" OR "bought o.o.n." OR "bought out-of-network" OR "bought non-par*" OR "bought non par*" OR "bought not par*" OR "buy* oon" OR "buy* o.o.n." OR "buy* out-of-network" OR "buy* non-par*" OR "buy* non par*" OR "buy* not par*" OR "pa* for oon" OR "pa* for o.o.n." OR "pa* for out-of-network" OR "pa* for non-par*" OR "pa* for non par*" OR "pa* for not par*")</u>

EXHIBIT 3

Search No.	Plaintiffs' 8/24/26 Revisions and Additions to Humana's 7/1/26 Proposed Search Terms
1.	(<u>"out of network"</u> OR allcaps(OON) OR out of area OR allcaps(OOA) OR NonPar* OR Non-Par* <u>OR "outside the network" OR "outside of the network" OR "beyond the network" OR "out of network" OR "out-of-network" OR allcaps(OON) OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR "non-par*" OR non-contract* OR noncontract* OR "non contract*" OR "out-of-network sol*" OR "out of network sol*" OR "end-to-end cost contain*" OR "un contract*" OR uncontract* OR "un-contract*" OR "zelis contract*")</u> W/50AND (repic* OR re-prec* OR allcaps(IPR) OR allcaps(OPR) <u>OR reimbur* OR fix* OR set* OR default* OR de-fault* OR "de fault*" OR initial* OR original* OR list* OR limit* OR suppress* OR align* OR curtail* OR pric* OR reduc* OR down* OR low* OR depress* OR decreas* OR flat* OR consist* OR custom* OR defensib* OR defenseib* OR defendab* OR defend-ab* OR "defend-ab*" OR discount* OR "fair rate*" OR overpa* OR "over-pa*" OR "over pa*" OR underpa* OR "under pa*" OR "capture sav*" OR "market-bas*" OR "market bas*" OR "market-based pric*" OR "defensible pric*" OR "defenseible pric*" OR "defendable pric*" OR "defend-ab* pric*" OR propriat* OR "nonarbitrary*" OR "non-arbitrar*" OR "pre-defin*")</u>)
2.	((performance W/2AND review*) OR (performance AND W/2 evaluat*) OR promotion* OR bonus* OR incentiv* OR compensat* OR commission* <u>OR hir* OR terminat* OR fir* OR demot* OR "leav* of absence*" OR resign* OR rais*)</u> W/50AND (repic* OR re-prec* OR allcaps(IPR) OR allcaps(OPR) <u>OR reimbur* OR fix* OR set* OR default* OR de-fault* OR "de fault*" OR initial* OR original* OR list* OR limit* OR suppress* OR align* OR curtail* OR pric* OR reduc* OR down* OR low* OR depress* OR decreas* OR flat* OR consist* OR custom* OR defensib* OR defenseib* OR defendab* OR defend-ab* OR "defend-ab*" OR discount* OR "fair rate*" OR overpa* OR "over-pa*" OR "over pa*" OR underpa* OR "under pa*" OR "capture sav*" OR "market-bas*" OR "market bas*" OR "market-based pric*" OR "defensible pric*" OR "defenseible pric*" OR "defendable pric*" OR "defend-ab* pric*" OR propriat* OR "nonarbitrary*" OR "non-arbitrar*" OR "pre-defin*")</u>)
3.	(Aetna OR Cigna OR Elevance OR UnitedHealth OR United Health OR allcaps(UHG) OR compet* <u>OR payer* OR payor* OR "dental payer*" OR "dental payor*" OR insur* OR "insurance co*" OR allcaps(TPA) OR "t.p.a." OR "third-party administrat*" OR "third party administrat*" OR "self fund*" OR self-fund* OR zelis OR zelis.com OR meritain OR "meritain health, inc." OR "meritain health" OR "meritain health dispute resol*" OR "the cigna group" OR "cigna group" OR humana OR united* OR "united health" OR unitedhealthgroup OR "unitedhealth group" OR "united healthgroup" OR "united healthcare" OR unitedhealthcare OR allcaps(UHG) OR "u.h.g." OR allcaps(UHC) OR "u.h.c." OR allcaps(UHCG) OR "u.h.c.g." OR "anthem blue cross of california" OR anthem OR "blue cross of california" OR "blue cross" OR allcaps(BCCA) OR "cigna health and life ins*" OR "healthscope benefits" OR healthscope OR "health scope" OR "healthscope benefits, inc." OR "allcaps(UMR), inc." OR "allcaps(UMR) inc" OR allcaps(UMR))</u> W/50AND (repic* OR re-prec* OR allcaps(IPR) OR allcaps(OPR) <u>OR reimbur* OR fix* OR set* OR default* OR de-fault* OR "de fault*" OR initial* OR original* OR list* OR limit* OR suppress* OR align* OR curtail* OR pric* OR reduc* OR down* OR low* OR depress* OR decreas* OR flat* OR consist* OR custom* OR defensib* OR defenseib* OR defendab* OR defend-ab* OR "defend-ab*" OR discount* OR "fair rate*" OR overpa* OR "over-pa*" OR "over pa*" OR underpa* OR "under pa*" OR "capture sav*" OR "market-bas*" OR "market bas*" OR "market-based pric*" OR "defensible pric*" OR "defenseible pric*" OR "defendable pric*" OR "defend-ab* pric*" OR propriat* * OR "re-imburs*" OR "nonarbitrary*" OR "non-arbitrar*" OR "pre-defin*")</u>)
4.	(Aetna OR Cigna OR Elevance OR UnitedHealth OR United Health OR allcaps(UHG) OR compet* <u>OR payer* OR payor* OR "dental payer*" OR "dental payor*" OR insur* OR "insurance co*" OR allcaps(TPA) OR "t.p.a." OR "third-party administrat*" OR "third party administrat*" OR "self fund*" OR self-fund* OR zelis OR zelis.com OR meritain OR "meritain health, inc." OR "meritain health" OR "meritain health dispute resol*" OR "the cigna group" OR "cigna group" OR humana OR united* OR "united health" OR unitedhealthgroup OR "unitedhealth group" OR "united healthgroup" OR "united healthcare" OR unitedhealthcare OR allcaps(UHG) OR "u.h.g." OR</u>

Search No.	Plaintiffs' 8/24/26 Revisions and Additions to Humana's 7/1/26 Proposed Search Terms
	<u>allcaps(UHC) OR "u.h.c." OR allcaps(UHCG) OR "u.h.c.g." OR "anthem blue cross of california" OR anthem OR "blue cross of california" OR "blue cross" OR allcaps(BCCA) OR "cigna health and life ins*" OR "healthscope benefits" OR healthscope OR "health scope" OR "healthscope benefits, inc." OR "allcaps(UMR), inc." OR "allcaps(UMR) inc" OR allcaps(UMR))</u> W/50 AND (out of network OR allcaps(OON) OR out of area OR allcaps(OOA) OR NonPar* OR Non-Par* <u>OR "out of network" OR "outside the network" OR "outside of the network" OR "beyond the network" OR "out of network" OR "out-of-network" OR allcaps(OON) OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR "non-par*" OR non-contract* OR noncontract* OR "non contract*" OR "out-of-network sol*" OR "out of network sol*" OR "end-to-end cost contain*" OR "un contract*" OR uncontract* OR "un-contract*" OR "zelis contract*")</u>
5.	(Zelis OR Zellis OR Zelious OR Zellious OR Zeliu OR Zellius OR Zealous <u>OR zelis.com OR "zelis.com" OR @zelis OR "@zelis" OR @zelis.com OR "@zelis.com")</u> AND (repic* OR re-prec* OR allcaps(IPR) OR allcaps(OPR) <u>OR reimbu* OR fix* OR set* OR default* OR de-fault* OR "de fault*" OR initial* OR original* OR list* OR limit* OR suppress* OR align* OR curtail* OR pric* OR reduc* OR down* OR low* OR depress* OR decreas* OR flat* OR consist* OR custom* OR defensib* OR defenseib* OR defendab* OR defend-ab* OR "defend-ab*" OR discount* OR "fair rate*" OR overpa* OR "over-pa*" OR "over pa*" OR underpa* OR "under pa*" OR "capture sav*" OR "market-bas*" OR "market bas*" OR "market-based pric*" OR "defensible pric*" OR "defenseible pric*" OR "defendable pric*" OR "defend-ab* pric*" OR propriet* OR "re-imburs*" OR "nonarbitrary*" OR "non-arbitrar*" OR "pre-defin*")</u>
6.	(Zelis OR Zellis OR Zelious OR Zellious OR Zeliu OR Zellius OR Zealous <u>OR zelis.com OR "zelis.com" OR @zelis OR "@zelis" OR @zelis.com OR "@zelis.com")</u> W/50 AND (out of network OR allcaps(OON) OR out of area OR allcaps(OOA) OR NonPar* OR Non-Par* <u>OR "out of network" OR "outside the network" OR "outside of the network" OR "beyond the network" OR "out of network" OR "out-of-network" OR allcaps(OON) OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR "non-par*" OR non-contract* OR noncontract* OR "non contract*" OR "out-of-network sol*" OR "out of network sol*" OR "end-to-end cost contain*" OR "un contract*" OR uncontract* OR "un-contract*" OR "zelis contract*")</u>
7.	(Stratos* OR Pay-Plus h Solutions OR Truvan OR Ethicare OR Strenuus OR Maverest OR NetMinder OR Redcard OR Sapphire Digital OR PayerCompass OR PaySpan OR Medxoom OR Qualident OR 4most OR Lodestone OR Keyclaims OR HealthLink OR allcaps(OPN) OR allcaps(OPPN) OR Coalition America <u>OR stratose* OR strat-ose* OR stratrose* OR strat-rose* OR allcaps(PHX) OR p.h.x. OR "pay-plus solutions" OR payplussolutions OR "payplus solutions" OR "pay plus solutions" OR allcaps(PPS) OR p.p.s. OR truven OR trueven OR "tru ven" OR "true ven" OR ethi-care OR "ethi care" OR strennus OR strennuus OR strenuous OR strennuous OR mavarest OR mavarast OR mavarest OR meverest OR net-minder OR "net minder" OR red-card OR "red card" OR "sapphire digital" OR sapphire-digital OR sapphiredigital OR "saphire digital" OR saphire-digital OR sapphiredigital OR medzoom OR med-xoom OR med-zoom OR "med xoom" OR "med zoom" OR "pay-span" OR "pay span" OR allied OR "allied benefit*" OR "strategic partner")</u> W/50 AND ((<u>"out of network" OR allcaps(OON) OR out of area OR allcaps(OOA) OR NonPar* OR Non-Par* OR "outside the network" OR "outside of the network" OR "beyond the network" OR "out of network" OR "out-of-network" OR allcaps(OON) OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR "non-par*" OR non-contract* OR noncontract* OR "non contract*" OR "out-of-network sol*" OR "out of network sol*" OR "end-to-end cost contain*" OR "un contract*" OR uncontract* OR "un-contract*" OR "zelis contract*")</u> W/25 AND (price* OR pricing OR repic* OR re-prec* OR reimbu* OR fix* OR set* OR default* OR de-fault* OR "de fault*" OR initial* OR original* OR list* OR limit* OR suppress* OR align* OR curtail* OR pric* OR reduc* OR down* OR low* OR depress* OR decreas* OR flat* OR consist* OR custom* OR defensib* OR defenseib* OR defendab* OR defend-ab* OR "defend-ab*" OR discount* OR "fair rate*" OR overpa* OR "over-pa*" OR "over pa*" OR underpa OR "under pa*" OR "capture sav*" OR "market-bas*" OR "market bas*" OR "market-

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	<u>based pric*</u> OR <u>"defensible pric"</u> OR <u>"defenseible pric"</u> OR <u>"defendable pric"</u> OR <u>"defend-ab* pric"</u> OR <u>propriet*</u> OR <u>"re-imbur*</u> OR <u>"nonarbitrary"</u> OR <u>"non-arbitrar*"</u> OR <u>"pre-defin*")</u>
8.	(Stratos* OR Pay-Plus ^{al} Solutions OR Truvan OR Ethicare OR Strenuus OR Maverest OR NetMinder OR Redcard OR Sapphire Digital OR PayerCompass OR PaySpan OR Medxoom OR Qualident OR 4most OR Lodestone OR Keyclaims OR HealthLink OR allcaps(OPN) OR allcaps(OPPN) OR Coalition America <u>OR stratose*</u> <u>OR strat-ose*</u> <u>OR stratrose*</u> <u>OR strat-rose*</u> <u>OR allcaps(PHX)</u> <u>OR p.h.x.</u> <u>OR "pay-plus solutions"</u> <u>OR payplussolutions</u> <u>OR "payplus solutions"</u> <u>OR "pay plus solutions"</u> <u>OR allcaps(PPS)</u> <u>OR p.p.s.</u> <u>OR truyen</u> <u>OR trueven</u> <u>OR "tru ven"</u> <u>OR "true ven"</u> <u>OR ethi-care</u> <u>OR "ethi care"</u> <u>OR strennus</u> <u>OR strennuus</u> <u>OR strenuous</u> <u>OR strennuous</u> <u>OR mavarest</u> <u>OR mavarast</u> <u>OR mavarest</u> <u>OR meverest</u> <u>OR net-minder</u> <u>OR "net minder"</u> <u>OR red-card</u> <u>OR "red card"</u> <u>OR "sapphire digital"</u> <u>OR sapphire-digital</u> <u>OR sapphiredigital</u> <u>OR "sapphire digital"</u> <u>OR saphire-digital</u> <u>OR sapphiredigital</u> <u>OR medzoom</u> <u>OR med-xoom</u> <u>OR med-zoom</u> <u>OR "med xoom"</u> <u>OR "med zoom"</u> <u>OR "pay-span"</u> <u>OR "pay span"</u> <u>OR allied</u> <u>OR "allied benefit"</u> <u>OR "strategic partner"</u>) W/50 AND (repric* OR re-pric* OR allcaps(IPR) OR allcaps(OPR) <u>OR reimbur*</u> <u>OR fix*</u> <u>OR set*</u> <u>OR default*</u> <u>OR de-fault*</u> <u>OR "de fault"</u> <u>OR initial*</u> <u>OR original*</u> <u>OR list*</u> <u>OR limit*</u> <u>OR suppress*</u> <u>OR align*</u> <u>OR curtail*</u> <u>OR pric*</u> <u>OR reduc*</u> <u>OR down*</u> <u>OR low*</u> <u>OR depress*</u> <u>OR decreas*</u> <u>OR flat*</u> <u>OR consist*</u> <u>OR custom*</u> <u>OR defensib*</u> <u>OR defenseib*</u> <u>OR defendab*</u> <u>OR defend-ab*</u> <u>OR "defend-ab"</u> <u>OR discount*</u> <u>OR "fair rate"</u> <u>OR overpa*</u> <u>OR "over-pa"</u> <u>OR "over pa"</u> <u>OR underpa*</u> <u>OR "under pa"</u> <u>OR "capture sav"</u> <u>OR "market-bas"</u> <u>OR "market bas"</u> <u>OR "market-based pric"</u> <u>OR "defensible pric"</u> <u>OR "defenseible pric"</u> <u>OR "defendable pric"</u> <u>OR "defend-ab* pric"</u> <u>OR propriet*</u> <u>OR "re-imbur*</u> <u>OR "nonarbitrary"</u> <u>OR "non-arbitrar*"</u> OR <u>"pre-defin*")</u>
9.	(Established Reimbursement Schedule OR Established Reimbursement Solution OR allcaps(ERS) <u>OR "e.r.s."</u> <u>OR e-r-s</u> <u>OR "e-r-s"</u> <u>OR "est* reimburs* schedul"</u> <u>OR "fee schedul"</u> <u>OR "est* reimburs* service"</u> <u>OR "est* reimburs* sol"</u>)
10.	(Reference* Based Pricing OR allcaps(RBP) <u>OR reference-bas* pric*</u> <u>OR reference bas* pric*</u> <u>OR referenced-bas* pric*</u> <u>OR referenced bas* pric*</u> <u>OR r.b.p.</u> <u>OR "r.b.p."</u> <u>OR r-b-p</u> <u>OR "r-b-p"</u>) AND (Zelis OR Zellis OR Zelious OR Zellious OR Zelius OR Zellius OR Zealous <u>OR zelis.com</u> <u>OR "zelis.com"</u> <u>OR @zelis</u> <u>OR "@zelis"</u> <u>OR @zelis.com</u> <u>OR "@zelis.com"</u>)
11.	(Reference* Based Pricing OR allcaps(RBP) <u>OR reference-bas* pric*</u> <u>OR reference bas* pric*</u> <u>OR referenced-bas* pric*</u> <u>OR referenced bas* pric*</u> <u>OR r.b.p.</u> <u>OR "r.b.p."</u> <u>OR r-b-p</u> <u>OR "r-b-p"</u>) AND (repric* OR re-pric* OR allcaps(IPR) OR allcaps(OPR) OR out of network OR allcaps(OON) OR out of area OR allcaps(OOA) OR NonPar* OR Non-Par* <u>OR reimbur*</u> <u>OR fix*</u> <u>OR set*</u> <u>OR default*</u> <u>OR de-fault*</u> <u>OR "de fault"</u> <u>OR initial*</u> <u>OR original*</u> <u>OR list*</u> <u>OR limit*</u> <u>OR suppress*</u> <u>OR align*</u> <u>OR curtail*</u> <u>OR pric*</u> <u>OR reduc*</u> <u>OR down*</u> <u>OR low*</u> <u>OR depress*</u> <u>OR decreas*</u> <u>OR flat*</u> <u>OR consist*</u> <u>OR custom*</u> <u>OR defensib*</u> <u>OR defenseib*</u> <u>OR defendab*</u> <u>OR defend-ab*</u> <u>OR "defend-ab"</u> <u>OR discount*</u> <u>OR "fair rate"</u> <u>OR overpa*</u> <u>OR "over-pa"</u> <u>OR "over pa"</u> <u>OR underpa*</u> <u>OR "under pa"</u> <u>OR "capture sav"</u> <u>OR "market-bas"</u> <u>OR "market bas"</u> <u>OR "market-based pric"</u> <u>OR "defensible pric"</u> <u>OR "defenseible pric"</u> <u>OR "defendable pric"</u> <u>OR "defend-ab* pric"</u> <u>OR propriet*</u> <u>OR "re-imbur*</u> <u>OR "nonarbitrary"</u> <u>OR "non-arbitrar*"</u> OR <u>"pre-defin"</u> <u>OR "out of network"</u> <u>OR "outside the network"</u> <u>OR "outside of the network"</u> <u>OR "beyond the network"</u> <u>OR "out of network"</u> <u>OR "out-of-network"</u> <u>OR allcaps(OON)</u> <u>OR o-o-n</u> <u>OR "o.o.n."</u> <u>OR onet</u> <u>OR "o-net"</u> <u>OR "o net"</u> <u>OR "non-par"</u> <u>OR non-contract*</u> <u>OR noncontract*</u> <u>OR "non contract"</u> <u>OR "out-of-network sol"</u> <u>OR "out of network sol"</u> <u>OR "end-to-end cost contain"</u> <u>OR "un contract"</u> <u>OR uncontract*</u> <u>OR "un-contract"</u> <u>OR "zelis contract"</u>)
12.	(Open Access Pricing OR allcaps(OAP) <u>OR open access pric*</u>)
13.	(price map* OR pricemap* <u>OR zelis pric* map*</u>)
14.	(Intelligent Pricing Platform OR allcaps(ZIPP) <u>OR intel* pric*</u> <u>platform*</u> <u>OR allcaps(ZIPP)</u> <u>OR z.i.p.p.</u> <u>OR "z.i.p.p."</u>)
15.	(Network360 OR Network 360 <u>OR network-360</u> <u>OR "network-360"</u>)
16.	(QuickReprice OR Quick Reprice <u>OR quickreprice*</u> <u>OR "quick repric"</u> <u>OR quick-reprice*</u> <u>OR "quick-reprice"</u>)

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17.	(Claim Pass OR ClaimPass OR allcaps(CPS) OR allcaps(CSPS) <u>OR claim-pass* OR "claim-pass*" OR c.p.s. OR "c.p.s." OR c.s.p.s. OR "c.s.p.s."</u>) AND (Zelis OR Zellis OR Zelious OR Zellious OR Zelius OR Zellius OR Zealous <u>OR zelis.com OR "zelis.com" OR @zelis OR "@zelis" OR @zelis.com OR "@zelis.com"</u>)
18.	(Claim Pass OR ClaimPass OR allcaps(CPS) OR allcaps(CSPS) <u>OR claim-pass* OR "claim-pass*" OR c.p.s. OR "c.p.s." OR c.s.p.s. OR "c.s.p.s."</u>) W/50 AND (repric* OR re-prec* OR allcaps(IPR) OR allcaps(OPR) OR out of network OR allcaps(OON) OR out of area OR allcaps(OOA) OR NonPar* OR Non-Par* <u>OR reimburs* OR fix* OR set* OR default* OR de-fault* OR "de fault*" OR initial* OR original* OR list* OR limit* OR suppress* OR align* OR curtail* OR pric* OR reduc* OR down* OR low* OR depress* OR decreas* OR flat* OR consist* OR custom* OR defensib* OR defenseib* OR defendab* OR defend-ab* OR "defend-ab*" OR discount* OR "fair rate*" OR overpa* OR "over-pa*" OR "over pa*" OR underpa* OR "under pa*" OR "capture sav*" OR "market-bas*" OR "market bas*" OR "market-based pric*" OR "defensible pric*" OR "defenseible pric*" OR "defendable pric*" OR "defend-ab* pric*" OR propriet* OR "re-imburs*" OR "nonarbitrary*" OR "non-arbitrar*" OR "pre-defin*" OR "out of network" OR "outside the network" OR "outside of the network" OR "beyond the network" OR "out of network" OR "out-of-network" OR allcaps(OON) OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR "non-par*" OR non-contract* OR noncontract* OR "non contract*" OR "out-of-network sol*" OR "out of network sol*" OR "end-to-end cost contain*" OR "un contract*" OR uncontract* OR "un-contract*" OR "zelis contract*")</u>
19.	(Supplemental Network Service* <u>OR supp* network* serv*</u>)
20.	(Accelerated Payment OR AP Program OR AP Network <u>OR accelerat* pa* OR "ap program*" OR "a.p. program*" OR "allcaps(AP) network*" OR "a.p. network*"</u>)
21.	(PPO Network Services <u>OR allcaps(PPO) network* OR p.p.o. network* OR wrap network* OR rental network* OR supplement* network*</u>)
22.	(Medical Reimbursement Analysis Service* <u>OR medical reimbursement analysis service*</u>)
23.	(professional negotiation service* OR allcaps(PNS) OR allcaps(PPNS) <u>OR professional negotiat* serv* OR "prof'l negotiat* serv*" OR allcaps(PNS) OR p.n.s. OR "p.n.s." OR allcaps(PPNS) OR p.p.n.s. OR "p.p.n.s."</u>)
24.	(DeSantis Breindel <u>OR desantisbreindel OR desantisbreindel@ OR "desantisbreindel@" OR desantis OR breindel OR "de santis breindel" OR "de santis"</u>) AND (Zelis OR Zellis OR Zelious OR Zellious OR Zelius OR Zellius OR Zealous <u>OR zelis.com OR "zelis.com" OR @zelis OR "@zelis" OR @zelis.com OR "@zelis.com"</u>)
25.	(Availity <u>OR availity OR avail*</u>) AND (Zelis OR Zellis OR Zelious OR Zellious OR Zelius OR Zellius OR Zealous <u>OR zelis.com OR "zelis.com" OR @zelis OR "@zelis" OR @zelis.com OR "@zelis.com"</u>)
26.	(America* Health Insurance Plan* OR allcaps(AHIP) <u>OR a.h.i.p. OR "a.h.i.p." OR "america's health insurance plan*" OR "american health insurance plan*" OR "america* health ins* plan*"</u>) AND (Zelis OR Zellis OR Zelious OR Zellious OR Zelius OR Zellius OR Zealous <u>OR zelis.com OR "zelis.com" OR @zelis OR "@zelis" OR @zelis.com OR "@zelis.com"</u>)
27.	(Aetna OR Cigna OR Elevance OR UnitedHealth OR United Health OR allcaps(UHG) <u>OR compet* OR payer* OR payor* OR "dental payer*" OR "dental payor*" OR insur* OR "insurance co*" OR allcaps(TPA) OR "t.p.a." OR "third-party administrat*" OR "third party administrat*" OR "self fund*" OR self-fund* OR zelis OR zelis.com OR meritain OR "meritain health, inc." OR "meritain health" OR "meritain health dispute resol*" OR "the cigna group" OR "cigna group" OR humana OR united* OR "united health" OR unitedhealthgroup OR "unitedhealth group" OR "united healthgroup" OR "united healthcare" OR unitedhealthcare OR allcaps(UHG) OR "u.h.g." OR allcaps(UHC) OR "u.h.c." OR allcaps(UHCG) OR "u.h.c.g." OR "anthem blue cross of california" OR anthem OR "blue cross of california" OR "blue cross" OR allcaps(BCCA) OR "cigna health and life ins*" OR "healthscope benefits" OR healthscope OR "health scope" OR "healthscope benefits, inc." OR "allcaps(UMR), inc." OR "allcaps(UMR) inc" OR allcaps(UMR)) AND (Zelis OR Zellis OR Zelious OR Zellious OR Zelius OR Zellius OR Zealous <u>OR zelis.com OR "zelis.com" OR @zelis OR "@zelis" OR @zelis.com OR "@zelis.com"</u>)</u>

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28.	(Payment Harmonization Index <u>OR payment* harmon* ind* OR allcaps(PHI) OR p.h.i. OR "p.h.i."</u>)
29.	(Zelis OR Zellis OR Zelious OR Zellious OR Zeliu OR Zellius OR Zealous <u>OR zelis.com OR "zelis.com" OR @zelis OR "@zelis" OR @zelis.com OR "@zelis.com"</u>) AND ((out of network OR allcaps(OON) OR out of area OR allcaps(OOA) OR NonPar* OR Non-Par* <u>OR "out of network" OR "outside the network" OR "outside of the network" OR "beyond the network" OR "out of network" OR "out-of-network" OR allcaps(OON) OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR "non-par*" OR non-contract* OR noncontract* OR "non contract*" OR "out-of-network sol*" OR "out of network sol*" OR "end-to-end cost contain*" OR "un contract*" OR uncontract* OR "un-contract*" OR "zelis contract*") W/5AND (claim OR claims OR pay* OR paid OR unpaid <u>OR payment* OR reimburs* OR amount* OR rate* OR level*"))</u></u>
30.	(Pacific Inpatient OR Scaccia OR (Dennis W/2 AND Ayer) OR James Paul Allen OR Allen Dental OR Bachoua <u>OR "pacific inpatient" OR "pacific inpatient medical group" OR pacific OR allcaps(PIMG) OR "p.i.m.g." OR ayer OR allcaps(APC) OR "a.p.c." OR allcaps(DBC) OR "d.b.c." OR "4 missing peace" OR "4 missing peace corps, Inc." OR "missing peace" OR "the missing peace center" OR "rhodes-levin" OR "chris laurence" OR laurence OR "ethan ciment" OR "ciment" OR "chelsea foot and ankle p.c." OR chelsea OR "chelsea foot"</u>) AND (Zelis OR Zellis OR Zelious OR Zellious OR Zeliu OR Zellius OR Zealous <u>OR zelis.com OR "zelis.com" OR @zelis OR "@zelis" OR @zelis.com OR "@zelis.com"</u>)
31.	(Pacific Inpatient OR Scaccia OR (Dennis W/2 AND Ayer) OR James Paul Allen OR Allen Dental OR Bachoua <u>OR "pacific inpatient" OR "pacific inpatient medical group" OR pacific OR allcaps(PIMG) OR "p.i.m.g." OR ayer OR allcaps(APC) OR "a.p.c." OR allcaps(DBC) OR "d.b.c." OR "4 missing peace" OR "4 missing peace corps, Inc." OR "the missing peace center" OR "missing peace" OR "rhodes-levin" OR "chris laurence" OR laurence OR "ethan ciment" OR "ciment" OR "chelsea foot and ankle p.c." OR chelsea OR "chelsea foot"</u>) AND (repic* OR re-prec* OR allcaps(IPR) OR allcaps(OPR) <u>OR reimburs* OR fix* OR set* OR default* OR de-fault* OR "de fault*" OR initial* OR original* OR list* OR limit* OR suppress* OR align* OR curtail* OR pric* OR reduc* OR down* OR low* OR depress* OR decreas* OR flat* OR consist* OR custom* OR defensib* OR defenseib* OR defendab* OR defend-ab* OR "defend-ab*" OR discount* OR "fair rate*" OR overpa* OR "over-pa*" OR "over pa*" OR underpa* OR "under pa*" OR "capture sav*" OR "market-bas*" OR "market bas*" OR "market-based pric*" OR "defensible pric*" OR "defenseible pric*" OR "defendable pric*" OR "defend-ab* pric*" OR propriet* OR "re-imbur*" OR "nonarbitrary*" OR "non-arbitrar*" OR "pre-define*")</u>
32.	(Pacific Inpatient OR Scaccia OR (Dennis W/2 AND Ayer) OR James Paul Allen OR Allen Dental OR Bachoua <u>OR "pacific inpatient" OR "pacific inpatient medical group" OR pacific OR allcaps(PIMG) OR "p.i.m.g." OR ayer OR allcaps(APC) OR "a.p.c." OR allcaps(DBC) OR "d.b.c." OR "4 missing peace" OR "4 missing peace corps, Inc." OR "missing peace" OR "the missing peace center" OR "rhodes-levin" OR "chris laurence" OR laurence OR "ethan ciment" OR "ciment" OR "chelsea foot and ankle p.c." OR chelsea OR "chelsea foot"</u>) W/50 AND (out of network OR allcaps(OON) OR out of area OR allcaps(OOA) OR NonPar* OR Non-Par* <u>OR "out of network" OR "outside the network" OR "outside of the network" OR "beyond the network" OR "out of network" OR "out-of-network" OR allcaps(OON) OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR "non-par*" OR non-contract* OR noncontract* OR "non contract*" OR "out-of-network sol*" OR "out of network sol*" OR "end-to-end cost contain*" OR "un contract*" OR uncontract* OR "un-contract*" OR "zelis contract*")</u>
33.	(Zelis OR Zellis OR Zelious OR Zellious OR Zeliu OR Zellius OR Zealous <u>OR zelis.com OR "zelis.com" OR @zelis OR "@zelis" OR @zelis.com OR "@zelis.com"</u>) W/50 AND (agreement* OR amend* OR statement* of work OR allcaps(SOW) OR SOWs OR exhibit OR exhibits OR contract* OR s.o.w. OR "s.o.w." OR "sow*" OR "statement* of work*" OR "stmt* of work*" OR "side letter*" OR "side-letter*" OR agree* OR "allcaps(MOU)" OR m.o.u. OR "m.o.u." OR "allcaps(MOA)" OR m.o.a. OR "m.o.a." OR allcaps(LOI) OR l.o.i. OR "l.o.i." OR "allcaps(LOA)" OR l.o.a. OR "l.o.a.")
34.	(Stratos* OR Pay-Plus al Solutions OR Truvan OR Ethicare OR Strenuus OR Maverest OR NetMinder OR Redcard OR Sapphire Digital OR PayerCompass OR PaySpan OR Medxoom OR Qualident OR

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	4most OR Lodestone OR Keyclaims OR HealthLink OR allcaps(OPN) OR allcaps(OPPN) OR Coalition America <u>OR stratose* OR strat-ose* OR stratrose* OR strat-rose* OR allcaps(PHX) OR p.h.x. OR "pay-plus solutions" OR payplussolutions OR "payplus solutions" OR "pay plus solutions" OR allcaps(PPS) OR p.p.s. OR truven OR trueven OR "tru ven" OR "true ven" OR ethi-care OR "ethi care" OR strennus OR strennuus OR strenuous OR strennuous OR mavarest OR mavarast OR mavarest OR meverest OR net-minder OR "net minder" OR red-card OR "red card" OR "sapphire digital" OR sapphire-digital OR sapphiredigital OR "saphire digital" OR saphire-digital OR sapphiredigital OR medzoom OR med-xoom OR med-zoom OR "med xoom" OR "med zoom" OR "pay-span" OR "pay span" OR allied OR "allied benefit*" OR "strategic partner")</u> W/50AND (agreement* OR amend* OR statement* of work OR allcaps(SOW) OR SOWs OR exhibit OR exhibits OR contract*) <u>OR s.o.w. OR "s.o.w." OR "sow*" OR "statement* of work*" OR "stmt* of work*" OR amend* OR "side letter*" OR "side-letter*" OR agree* OR "allcaps(MOU)" OR m.o.u. OR "m.o.u." OR "allcaps(MOA)" OR m.o.a. OR "m.o.a." OR allcaps(LOI) OR l.o.i. OR "l.o.i." OR "allcaps(LOA)" OR l.o.a. OR "l.o.a.")</u>
35.	<u>(Continuous Discount Agreement* OR allcaps(CDA) OR continuous discount* agreement* OR c.d.a. OR "c.d.a.")</u>
36.	(Aetna OR Cigna OR Elevance OR UnitedHealth OR United Health OR allcaps(UHG) <u>OR compet* OR payer* OR payor* OR "dental payer*" OR "dental payor*" OR insur* OR "insurance co*" OR allcaps(TPA) OR "t.p.a." OR "third-party administrat*" OR "third party administrat*" OR "self fund*" OR self-fund* OR zelis OR zelis.com OR meritain OR "meritain health, inc." OR "meritain health" OR "meritain health dispute resol*" OR "the cigna group" OR "cigna group" OR humana OR united* OR "united health" OR unitedhealthgroup OR "unitedhealth group" OR "united healthgroup" OR "united healthcare" OR unitedhealthcare OR allcaps(UHG) OR "u.h.g." OR allcaps(UHC) OR "u.h.c." OR allcaps(UHCG) OR "u.h.c.g." OR "anthem blue cross of california" OR anthem OR "blue cross of california" OR "blue cross" OR allcaps(BCCA) OR "cigna health and life ins*" OR "healthscope benefits" OR healthscope OR "health scope" OR "healthscope benefits, inc." OR "allcaps(UMR), inc." OR "allcaps(UMR) inc" OR allcaps(UMR)</u> W/50AND ("out of network" OR allcaps(OON) OR out of area OR allcaps(OOA) OR NonPar* OR Non-Par* <u>OR "outside the network" OR "outside of the network" OR "beyond the network" OR "out of network" OR "out-of-network" OR allcaps(OON) OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR "non-par*" OR non-contract* OR noncontract* OR "non contract*" OR "out-of-network sol*" OR "out of network sol*" OR "end-to-end cost contain*" OR "un contract*" OR uncontract* OR "un-contract*" OR "zelis contract*")</u>)
37.	("out of network" OR allcaps(OON) OR out of area OR allcaps(OOA) OR NonPar* OR Non-Par* <u>"outside the network" OR "outside of the network" OR "beyond the network" OR "out of network" OR "out-of-network" OR allcaps(OON) OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR "non-par*" OR non-contract* OR noncontract* OR "non contract*" OR "out-of-network sol*" OR "out of network sol*" OR "end-to-end cost contain*" OR "un contract*" OR uncontract* OR "un-contract*" OR "zelis contract*")</u> W/25AND (marketshare* OR market share* <u>OR "geograph* adjust*" OR "geograph* scop*" OR "geograph* reach*" OR "geograph* area*" OR "geograph* market*")</u>)
38.	("out of network" OR allcaps(OON) OR out of area OR allcaps(OOA) OR NonPar* OR Non-Par* <u>OR "outside the network" OR "outside of the network" OR "beyond the network" OR "out of network" OR "out-of-network" OR allcaps(OON) OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR "non-par*" OR non-contract* OR noncontract* OR "non contract*" OR "out-of-network sol*" OR "out of network sol*" OR "end-to-end cost contain*" OR "un contract*" OR uncontract* OR "un-contract*" OR "zelis contract*")</u> W/2AND (market OR markets OR "market rat*" OR market-rat* OR "full rat*" OR "compet* rat*" OR invoic* OR "full invoic*" OR "as invoic*" OR "as-invoic*" OR "market pric*" OR "full pric*" OR market*)
39.	("out of network" OR allcaps(OON) OR out of area OR allcaps(OOA) OR NonPar* OR Non-Par* <u>OR "outside the network" OR "outside of the network" OR "beyond the network" OR "out of network"</u>

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	OR "out-of-network" OR allcaps(OON) OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR "non-par*" OR non-contract* OR noncontract* OR "non contract*" OR "out-of-network sol*" OR "out of network sol*" OR "end-to-end cost contain*" OR "un contract*" OR uncontract* OR "un-contract*" OR "zelis contract*") W/25AND (compet* OR conspir* OR co-conspir* OR "co conspir*" OR cartel* OR agree* OR collu* OR manipul* OR influen* OR lower OR decrease OR fix* OR default* OR de-fault* OR "de fault*" OR initial* OR original* OR list* OR coordinat* OR set* OR align* OR "go above" OR "adhere" OR cartel* OR agree* OR compet* OR "absence of compet*" OR "absent compet*" OR "allcaps(DO) not compet*" OR "no longer compet*" OR "avoid compet*" OR "lack of compet*" OR "decreased levels of compet*" OR "lessened compet*" OR "relief from compet*" OR "relieved from compet*" OR "competitive relie*" OR violat* OR antitrust* OR "anti-trust*" OR "anti trust*" OR coordinat* OR "co-ordinat*" OR "co ordinat*" OR "anti-compet*" OR anticompet* OR "anti compet*")
40.	("Transparency in Coverage" OR allcaps(TIC) OR (transparency W/5AND rule) OR "transparency in coverage" OR t.i.c. OR "t.i.c." OR t-i-c OR "t-i-c" OR "transparency in coverage rule*" OR "allcaps(TIC) rule*" OR "t.i.c. rule*" OR "t-i-c rule*" OR "machine-readable file*" OR allcaps(MRF) OR m.r.f. OR "m.r.f." OR m-r-f OR "m-r-f" OR compl* OR "allcaps(TIC) allcaps(MRF) files" OR "t.i.c. m.r.f." OR "allcaps(MRF) creat*" OR "m.r.f. creat*" OR hub* OR spoke*) W/50AND (repic* OR re-ric* OR allcaps(IPR) OR allcaps(OPR) OR reimburs* OR fix* OR set* OR default* OR de-fault* OR "de fault*" OR initial* OR original* OR list* OR limit* OR suppress* OR align* OR curtail* OR pric* OR reduc* OR down* OR low* OR depress* OR decreas* OR flat* OR consist* OR custom* OR defensib* OR defenseib* OR defendab* OR defend-ab* OR "defend-ab*" OR discount* OR "fair rate*" OR overpa* OR "over-pa*" OR "over pa*" OR underpa* OR "under pa*" OR "capture sav*" OR "market-bas*" OR "market bas*" OR "market-based pric*" OR "defensible pric*" OR "defenseible pric*" OR "defendable pric*" OR "defend-ab* pric*" OR propri* OR "re-imburs*" OR "nonarbitrary*" OR "non-arbitrar*" OR "pre-defin*")
41.	(Transparency in Coverage OR allcaps(TIC) OR (transparency W/5AND rule) OR "transparency in coverage" OR t.i.c. OR "t.i.c." OR t-i-c OR "t-i-c" OR "transparency in coverage rule*" OR "allcaps(TIC) rule*" OR "t.i.c. rule*" OR "t-i-c rule*" OR "machine-readable file*" OR allcaps(MRF) OR m.r.f. OR "m.r.f." OR m-r-f OR "m-r-f" OR compl* OR "allcaps(TIC) allcaps(MRF) files" OR "t.i.c. m.r.f." OR "allcaps(MRF) creat*" OR "m.r.f. creat*" OR hub* OR spoke*) W/50AND (out of network OR allcaps(OON) OR out of area OR allcaps(OOA) OR NonPar* OR Non-Par* OR "out of network" OR "outside the network" OR "outside of the network" OR "beyond the network" OR "out of network" OR "out-of-network" OR allcaps(OON) OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR "non-par*" OR non-contract* OR noncontract* OR "non contract*" OR "out-of-network sol*" OR "out of network sol*" OR "end-to-end cost contain*" OR "un contract*" OR uncontract* OR "un-contract*" OR "zelis contract*")
42.	(Zelis OR Zellis OR Zelious OR Zellious OR Zeli* OR Zelli* OR Zealous OR zelis.com OR "zelis.com" OR @zelis OR "@zelis" OR @zelis.com OR "@zelis.com") W/50AND (compet* OR conspir* OR co-conspir* OR "co conspir*" OR cartel* OR agree* OR collu* OR manipul* OR influen* OR lower OR decrease OR fix* OR default* OR de-fault* OR "de fault*" OR initial* OR original* OR list* OR coordinat* OR set* OR align* OR "go above" OR "adhere" OR cartel* OR agree* OR compet* OR "absence of compet*" OR "absent compet*" OR "allcaps(DO) not compet*" OR "no longer compet*" OR "avoid compet*" OR "lack of compet*" OR "decreased levels of compet*" OR "lessened compet*" OR "relief from compet*" OR "relieved from compet*" OR "competitive relie*" OR violat* OR antitrust* OR "anti-trust*" OR "anti trust*" OR coordinat* OR "co-ordinat*" OR "co ordinat*" OR "anti-compet*" OR anticompet* OR "anti compet*")
43.	(Zelis OR Zellis OR Zelious OR Zellious OR Zeli* OR Zelli* OR Zealous OR zelis.com OR "zelis.com" OR @zelis OR "@zelis" OR @zelis.com OR "@zelis.com") AND (Aetna OR Cigna OR Elevance OR UnitedHealth OR United Health OR allcaps(UHG) OR compet* OR payer* OR payor* OR "dental payer*" OR "dental payor*" OR insur* OR "insurance co*" OR allcaps(TPA) OR "t.p.a." OR "third-party administrat*" OR "third party administrat*" OR "self fund*" OR self-fund* OR zelis OR

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	<u>zelis.com OR meritain OR "meritain health, inc." OR "meritain health" OR "meritain health dispute resol*" OR "the cigna group" OR "cigna group" OR humana OR united* OR "united health" OR unitedhealthgroup OR "unitedhealth group" OR "united healthgroup" OR "united healthcare" OR unitedhealthcare OR allcaps(UHG) OR "u.h.g." OR allcaps(UHC) OR "u.h.c." OR allcaps(UHCG) OR "u.h.c.g." OR "anthem blue cross of california" OR anthem OR "blue cross of california" OR "blue cross" OR allcaps(BCCA) OR "cigna health and life ins*" OR "healthscope benefits" OR healthscope OR "health scope" OR "healthscope benefits, inc." OR "allcaps(UMR), inc." OR "allcaps(UMR) inc" OR allcaps(UMR))</u>
44.	(Zelis OR Zellis OR Zelious OR Zellious OR Zeliu OR Zellius OR Zealous <u>OR zelis.com OR "zelis.com" OR @zelis OR "@zelis" OR @zelis.com OR "@zelis.com"</u>) W/25 AND (marketshare* OR market share* <u>OR "geograph* adjust*" OR "geograph* scop*" OR "geograph* reach*" OR "geograph* area*" OR "geograph* market*"</u>)
45.	(Zelis OR Zellis OR Zelious OR Zellious OR Zeliu OR Zellius OR Zealous <u>OR zelis.com OR "zelis.com" OR @zelis OR "@zelis" OR @zelis.com OR "@zelis.com"</u>) W/2 AND (market OR markets <u>OR "market rat*" OR market-rat* OR "full rat*" OR "compet* rat*" OR invoic* OR "full invoic*" OR "as invoic*" OR "as-invoic*" OR "market pric*" OR "full pric*" OR market*</u>)
46.	((compet* OR Aetna OR Cigna OR Elevance OR UnitedHealth OR United Health OR allcaps(UHG) <u>OR payer* OR payor* OR "dental payer*" OR "dental payor*" OR insur* OR "insurance co*" OR allcaps(TPA) OR "t.p.a." OR "third-party administrat*" OR "third party administrat*" OR "self fund*" OR self-fund* OR zelis OR zelis.com OR meritain OR "meritain health, inc." OR "meritain health" OR "meritain health dispute resol*" OR "the cigna group" OR "cigna group" OR humana OR united* OR "united health" OR unitedhealthgroup OR "unitedhealth group" OR "united healthgroup" OR "united healthcare" OR unitedhealthcare OR allcaps(UHG) OR "u.h.g." OR allcaps(UHC) OR "u.h.c." OR allcaps(UHCG) OR "u.h.c.g." OR "anthem blue cross of california" OR anthem OR "blue cross of california" OR "blue cross" OR allcaps(BCCA) OR "cigna health and life ins*" OR "healthscope benefits" OR healthscope OR "health scope" OR "healthscope benefits, inc." OR "allcaps(UMR), inc." OR "allcaps(UMR) inc" OR allcaps(UMR)) W/50 AND (Zelis OR Zellis OR Zelious OR Zellious OR Zeliu OR Zellius OR Zealous <u>OR zelis.com OR "zelis.com" OR @zelis OR "@zelis" OR @zelis.com OR "@zelis.com"</u>) W/50 AND (terminat* OR fire OR fired OR firing OR disciplin* OR suspen* OR reprimand* OR violat* <u>OR review* OR eval* OR assess* OR hir* OR promot* OR demot* OR resign* OR incentiv* OR rais*</u>)</u>
47.	((compet* OR Aetna OR Cigna OR Elevance OR UnitedHealth OR United Health OR allcaps(UHG) <u>OR payer* OR payor* OR "dental payer*" OR "dental payor*" OR insur* OR "insurance co*" OR allcaps(TPA) OR "t.p.a." OR "third-party administrat*" OR "third party administrat*" OR "self fund*" OR self-fund* OR zelis OR zelis.com OR meritain OR "meritain health, inc." OR "meritain health" OR "meritain health dispute resol*" OR "the cigna group" OR "cigna group" OR humana OR united* OR "united health" OR unitedhealthgroup OR "unitedhealth group" OR "united healthgroup" OR "united healthcare" OR unitedhealthcare OR allcaps(UHG) OR "u.h.g." OR allcaps(UHC) OR "u.h.c." OR allcaps(UHCG) OR "u.h.c.g." OR "anthem blue cross of california" OR anthem OR "blue cross of california" OR "blue cross" OR allcaps(BCCA) OR "cigna health and life ins*" OR "healthscope benefits" OR healthscope OR "health scope" OR "healthscope benefits, inc." OR "allcaps(UMR), inc." OR "allcaps(UMR) inc" OR allcaps(UMR)) W/50 AND ("out of network" OR allcaps(OON) OR out of area OR allcaps(OOA) OR NonPar* OR Non-Par* <u>OR "outside the network" OR "outside of the network" OR "beyond the network" OR "out of network" OR "out-of-network" OR allcaps(OON) OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR "non-par*" OR non-contract* OR noncontract* OR "non contract*" OR "out-of-network sol*" OR "out of network sol*" OR "end-to-end cost contain*" OR "un contract*" OR uncontract* OR "un-contract*" OR "zelis contract*") W/50 AND (terminat* OR fire OR fired OR firing OR disciplin* OR suspen* OR reprimand* OR violat* <u>OR review* OR eval* OR assess* OR hir* OR promot* OR demot* OR resign* OR incentiv* OR rais*</u>)</u></u>

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48.	(Zelis OR Zellis OR Zelious OR Zellious OR Zeliu OR Zellius OR Zealous OR zelis.com OR "zelis.com" OR @zelis OR "@zelis" OR @zelis.com OR "@zelis.com") AND (non-cover* OR "non cover*" OR "not cover*" OR uncover* OR "un-cover*" OR exclu* OR "not accept*" OR unaccept* OR "un-accept*" OR "not see" OR "not treat*" OR refus* OR declin* OR cancel* OR "turn* away" OR "pay* more" OR "paid more" OR "pay* less" OR "increas* payment*" OR "decreas* payment*" OR "greater benefit*" OR "smaller benefit*" OR "less cover*" OR "more cover*" OR "provider react*" OR discourag* OR dislik* OR "do not like" OR "don't like" OR "do not want*" OR "don't want*" OR unfair OR switch* OR "switch* away" OR "switch* from" OR "transition* away" OR "transition* from" OR "mov* away" OR "end* use" OR "end* our use" OR nonrenew* OR non-renew* OR "not renew*" OR unsubscri* OR "un subscri*" OR "stop* subscri*")
49.	(conspir* OR co-conspir* OR cartel* OR collu* OR coordinat* OR agree* OR antitrust* OR "anti-trust*" OR anticompet* OR "anti-compet*" OR compet* OR "absence of compet*" OR "lack of compet*" OR "lessened compet*" OR "competitive relie*") AND (payer* OR payor* OR insur* OR "insurance co*" OR allcaps(TPA) OR "t.p.a." OR "third-party administrat*" OR "third party administrat*" OR Aetna OR Meritain OR Cigna OR Elevance OR Humana OR UnitedHealth OR "United Health" OR allcaps(UHG) OR allcaps(UHC) OR Anthem OR Healthscope OR allcaps(UMR) OR "allcaps(UMR), inc." OR "allcaps(UMR) inc") OR repricer* OR re-pricer* OR Zelis OR Zellis OR Zelious OR Zellious OR Zeliu OR Zellius OR Zealous OR zelis.com OR "zelis.com" OR "out of network" OR allcaps(OON) OR "out-of-network" OR "outside the network" OR "outside of the network" OR "beyond the network" OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR nonpar* OR "non-par*" OR non-contract* OR noncontract* OR "non contract*" OR "out-of-network sol*" OR "out of network sol*" OR "un contract*" OR uncontract* OR "un-contract*" OR "zelis contract*")
50.	(shar* OR sen* OR distribut* OR exchang* OR communicat* OR discuss* OR disclos* OR meet* OR call* OR email* OR transfer* OR deliver* OR upload* OR up-load* OR "up load*" OR download* OR down-load* OR "down load*" OR allcaps(FTP) OR portal*) AND ("competitively sensitive" OR "commercially sensitive" OR confid* OR proprietar* OR claim* OR pric* OR rate* OR reimburs* OR reprice* OR cost* OR payment* OR sav* OR data*)
51.	(tool* OR method* OR technolog* OR databas* OR "survey data" OR "raw data" OR "underlying data" OR "source data" OR "fee schedul*" OR "est* reimburs* schedul*" OR "reference-bas* pric*" OR "reference bas* pric*" OR allcaps(RBP) OR algorithm* OR "artificial* intelligen*" OR allcaps(AI) OR "machin* learn*" OR calculat* OR determin*) AND (reprice* OR re-pric* OR reimburs* OR pric* OR discount* OR "fair rate*" OR overpa* OR underpa* OR "capture sav*" OR "market-bas*" OR "market bas*" OR "market-based pric*" OR "defensible pric*" OR nonarbitrar* OR "non-arbitrar*" OR "pre-defin*" OR "out of network" OR allcaps(OON) OR "out-of-network" OR "outside the network" OR "outside of the network" OR "beyond the network" OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR nonpar* OR "non-par*" OR non-contract* OR noncontract* OR "non contract*" OR "out-of-network sol*" OR "out of network sol*" OR "un contract*" OR uncontract* OR "un-contract*" OR "zelis contract*" OR percent* OR amount* OR ceiling* OR cap* OR floor* OR threshold* OR "no more than" OR "no less than" OR "allow* amount*" OR "reimburs* level*")
52.	(Ingenix OR "ingenix databas*" OR "new york attorney general*" OR allcaps(NYAG) OR Cuomo OR "assurance of discontinu*" OR "fair health" OR "reasonable and customary" OR "usual, customary and reasonable" OR allcaps(UCR) OR "market rat*") AND (reprice* OR re-pric* OR reimburs* OR pric* OR discount* OR "fair rate*" OR overpa* OR underpa* OR "capture sav*" OR "market-bas*" OR "market bas*" OR "market-based pric*" OR "defensible pric*" OR nonarbitrar* OR "non-arbitrar*" OR "pre-defin*" OR Zelis OR Zellis OR Zelious OR Zellious OR Zeliu OR Zellius OR Zealous OR zelis.com OR "zelis.com" OR rebrand*)
53.	(launch* OR brand* OR rebrand* OR re-brand* OR nam* OR renam* OR re-nam* OR "new* nam*" OR expir* OR terminat* OR "exclusive use*" OR exclusiv* OR "five year*" OR "5 year*" OR "June 13, 2016" OR 6/13/2016 OR 6-13-2016 OR "August 13, 2024" OR 8/13/2024 OR 8-13-2024 OR "top 5" OR "top five" OR "five largest" OR "5 largest" OR "500 client*" OR "750 client*" OR "770 client*")

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	<u>OR "repricing client*" OR "repricing customer*") AND (Zelis OR Zellis OR Zelious OR Zellious OR Zeliu OR Zellius OR Zealous OR zelis.com OR "zelis.com")</u>
54.	<u>(liab* OR culp* OR admi* OR conced* OR acknowledg* OR own* OR operat* OR manag* OR control* OR delegat* OR relinquish* OR entrust* OR ced* OR responsib* OR "network architect*" OR "network design*" OR "provider network*" OR "zelis ppo*" OR "zelis preferred provider org*" OR "wrap network*" OR "rental network*" OR "supplement* network*" OR allcaps(PPO) OR "preferred provider network*") AND ("out of network" OR allcaps(OON) OR "out-of-network" OR "outside the network" OR "outside of the network" OR "beyond the network" OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR nonpar* OR "non-par*" OR non-contract* OR noncontract* OR "non contract*" OR "out-of-network sol*" OR "out of network sol*" OR "un contract*" OR uncontract* OR "un-contract*" OR "zelis contract*" OR purcha* OR buy* OR bought*)</u>
55.	<u>(report* OR data* OR survey* OR summar* OR memo* OR artic* OR document* OR "white paper*" OR whitepaper* OR powerpoint* OR blog* OR deliverab* OR metric* OR dashboard* OR stud* OR projection* OR estimat* OR model*) AND (repic* OR re-prec* OR reimbur* OR pric* OR discount* OR "fair rate*" OR overpa* OR underpa* OR "capture sav*" OR "market-bas*" OR "market bas*" OR "market-based pric*" OR "defensible pric*" OR nonarbitrar* OR "non-arbitrar*" OR "pre-defin*" OR "out of network" OR allcaps(OON) OR "out-of-network" OR "outside the network" OR "outside of the network" OR "beyond the network" OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR nonpar* OR "non-par*" OR non-contract* OR noncontract* OR "non contract*" OR "out-of-network sol*" OR "out of network sol*" OR "un contract*" OR uncontract* OR "un-contract*" OR "zelis contract*")</u>
56.	<u>("zelis forum" OR "lost pines" OR "boca raton" OR retreat* OR "annual confer*" OR "client* confer*" OR "customer* confer*" OR "payer* confer*" OR "corporate event*" OR "Magic Johnson" OR "Jason Sudeikis" OR "Ted Lasso" OR "DeSantis Breindel") AND (Zelis OR Zellis OR Zelious OR Zellious OR Zeliu OR Zellius OR Zealous OR zelis.com OR "zelis.com" OR payer* OR payor* OR insur* OR "insurance co*" OR allcaps(TPA) OR "t.p.a." OR "third-party administrat*" OR "third party administrat*" OR Aetna OR Meritain OR Cigna OR Elevance OR Humana OR UnitedHealth OR "United Health" OR allcaps(UHG) OR allcaps(UHC) OR Anthem OR Healthscope OR allcaps(UMR) OR "allcaps(UMR), inc." OR "allcaps(UMR) inc" OR compet* OR repic* OR "out of network")</u>
57.	<u>(investigat* OR "department of justice" OR allcaps(DOJ) OR "grand jur*" OR "department of labor" OR allcaps(DOL) OR congress* OR "federal trade commission" OR allcaps(FTC) OR allcaps(FBI) OR "state investigat*") AND (Zelis OR Zellis OR Zelious OR Zellious OR Zeliu OR Zellius OR Zealous OR zelis.com OR "zelis.com" OR repic* OR re-prec* OR reimbur* OR pric* OR discount* OR "fair rate*" OR overpa* OR underpa* OR "capture sav*" OR "market-bas*" OR "market bas*" OR "market-based pric*" OR "defensible pric*" OR nonarbitrar* OR "non-arbitrar*" OR "pre-defin*" OR "out of network" OR allcaps(OON) OR "out-of-network" OR "outside the network" OR "outside of the network" OR "beyond the network" OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR nonpar* OR "non-par*" OR non-contract* OR noncontract* OR "non contract*" OR "out-of-network sol*" OR "out of network sol*" OR "un contract*" OR uncontract* OR "un-contract*" OR "zelis contract*" OR conspir* OR co-conspir* OR cartel* OR collu* OR coordinat* OR agree* OR antitrust* OR "anti-trust*" OR anticompet* OR "anti-compet*" OR compet* OR "absence of compet*" OR "lack of compet*" OR "lessened compet*" OR "competitive relie*")</u>
58.	<u>(disput* OR appeal* OR adjudicat* OR negotiat* OR renegotiat* OR parameter* OR "appeal* parameter*" OR adjust* OR reten* OR "initial payment offer*" OR "claims negotiat*" OR reprocess* OR "best and final" OR "negotiat* discount*" OR post-repic*) AND (repic* OR re-prec* OR reimbur* OR pric* OR discount* OR "fair rate*" OR overpa* OR underpa* OR "capture sav*" OR "market-bas*" OR "market bas*" OR "market-based pric*" OR "defensible pric*" OR nonarbitrar* OR "non-arbitrar*" OR "pre-defin*" OR "out of network" OR allcaps(OON) OR "out-of-network" OR "outside the network" OR "outside of the network" OR "beyond the network" OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR nonpar* OR "non-par*" OR non-contract* OR</u>

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	<u>noncontract* OR "non contract*" OR "out-of-network sol*" OR "out of network sol*" OR "un contract*" OR uncontract* OR "un-contract*" OR "zelis contract*")</u>
59.	<u>(director* OR consult* OR advisor* OR adviser* OR "board member*" OR "board meet*" OR "advisor* board" OR "adviser* board" OR "advisor* committee*" OR "board advisor*" OR "meet* notes" OR minute* OR veto* OR vote* OR "strategic advi*") AND (Zelis OR Zellis OR Zelious OR Zellious OR Zeliu OR Zellius OR Zealous OR zelis.com OR "zelis.com" OR reproc* OR re-prec* OR reimbur* OR pric* OR discount* OR "fair rate*" OR overpa* OR underpa* OR "capture sav*" OR "market-bas*" OR "market bas*" OR "market-based pric*" OR "defensible pric*" OR nonarbitrar* OR "non-arbitrar*" OR "pre-defin*" OR "out of network" OR allcaps(OON) OR "out-of-network" OR "outside the network" OR "outside of the network" OR "beyond the network" OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR nonpar* OR "non-par*" OR non-contract* OR noncontract* OR "non contract*" OR "out-of-network sol*" OR "out of network sol*" OR "un contract*" OR uncontract* OR "un-contract*" OR "zelis contract*" OR conspir* OR co-conspir* OR cartel* OR collu* OR coordinat* OR agree* OR antitrust* OR "anti-trust*" OR anticompet* OR "anti-compet*" OR compet* OR "absence of compet*" OR "lack of compet*" OR "lessened compet*" OR "competitive relie*")</u>
60.	<u>("balance* bill*" OR "bill* the bal*" OR "balance* bill* navigat*" OR "gap bill*" OR "claim deficien*" OR "bill* differen*" OR surpris* OR "surpris* act*") AND ("out of network" OR allcaps(OON) OR "out-of-network" OR "outside the network" OR "outside of the network" OR "beyond the network" OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR nonpar* OR "non-par*" OR non-contract* OR noncontract* OR "non contract*" OR "out-of-network sol*" OR "out of network sol*" OR "un contract*" OR uncontract* OR "un-contract*" OR "zelis contract*" OR reproc* OR re-prec* OR reimbur* OR pric* OR discount* OR "fair rate*" OR overpa* OR underpa* OR "capture sav*" OR "market-bas*" OR "market bas*" OR "market-based pric*" OR "defensible pric*" OR nonarbitrar* OR "non-arbitrar*" OR "pre-defin*")</u>
61.	<u>("health maintenance org*" OR "health maintenance network*" OR allcaps(HMO) OR "h.m.o." OR "health management org*" OR "health mgmt org*")</u>
62.	<u>(antitrust* OR anti-trust* OR "trade regulation*" OR "antitrust train*" OR "anti-trust train*" OR "antitrust guid*" OR "anti-trust guid*" OR "antitrust protocol*" OR "anti-trust protocol*" OR "Sherman Act" OR "15 U.S.C. § 1" OR "Clayton Act" OR "15 U.S.C. § 26")</u>
63.	<u>(Bain OR "Bain Capital" OR Parthenon OR "Parthenon Capital" OR Mubadala OR "Mubadala Investment Company" OR HarbourVest OR HarborVest OR Guidehouse OR "Office Ally" OR "private equity" OR invest* OR loan* OR credit*) AND (Zelis OR Zellis OR Zelious OR Zellious OR Zeliu OR Zellius OR Zealous OR zelis.com OR "zelis.com" OR control* OR leverag* OR steer* OR oblig* OR dictat* OR restrict*) AND (out of network OR allcaps(OON) OR out of area OR allcaps(OOA) OR NonPar* OR Non-Par* OR "out of network" OR "outside the network" OR "outside of the network" OR "beyond the network" OR "out of network" OR "out-of-network" OR allcaps(OON) OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR "non-par*" OR non-contract* OR noncontract* OR "non contract*" OR "out-of-network sol*" OR "out of network sol*" OR "end-to-end cost contain*" OR "un contract*" OR uncontract* OR "un-contract*" OR "zelis contract*")</u>
64.	<u>("artificial intelligence" OR "artificial* intel*" OR allcaps(AI) OR "a.i." OR algorithm* OR "ai-power*") AND (reproc* OR pric* OR reimbur* OR rout* OR method* OR methodolog* OR technolog* OR process* OR system*)</u>

EXHIBIT 4

Search No.	Plaintiffs' 8/25/26 Revisions and Additions to Cigna's 7/1/26 Proposed Search Terms
1.	((repic* OR re-prec* OR fix* OR limit* OR suppress* OR align* OR curtail* OR reduc* OR down* OR low* OR depress* OR decreas* OR flat* OR consist* <u>OR reimburs*</u> <u>OR set*</u> <u>OR default*</u> <u>OR de-fault*</u> <u>OR "de fault"</u> <u>OR initial*</u> <u>OR original*</u> <u>OR list*</u> <u>OR pric*</u> <u>OR custom*</u> <u>OR defensib*</u> <u>OR defenseib*</u> <u>OR defendab*</u> <u>OR defend-ab*</u> <u>OR "defend-ab"</u> <u>OR discount*</u> <u>OR "fair rate"</u> <u>OR overpa*</u> <u>OR "over-pa"</u> <u>OR "over pa"</u> <u>OR underpa*</u> <u>OR "under-pa"</u> <u>OR "under pa"</u> <u>OR "capture sav"</u> <u>OR "market-bas"</u> <u>OR "market bas"</u> <u>OR "market-based pric"</u> <u>OR "defensible pric"</u> <u>OR "defenseible pric"</u> <u>OR "defendable pric"</u> <u>OR "defend-ab pric"</u> <u>OR propriet*</u> <u>OR "re-imburs"</u> <u>OR "nonarbitrary"</u> <u>OR "non-arbitrar"</u> <u>OR "pre-defin"</u>) W/25 AND (Out of Network* OR OON OR Noncontract* OR Non contract* OR Uncontract* OR Un contract* OR Nonnegotiat* OR Non-negotiat* <u>OR "outside the network"</u> <u>OR "outside of the network"</u> <u>OR "beyond the network"</u> <u>OR "out-of-network"</u> <u>OR o-o-n</u> <u>OR "o.o.n."</u> <u>OR onet</u> <u>OR "o-net"</u> <u>OR "o net"</u> <u>OR NonPar*</u> <u>OR "non-par"</u> <u>OR non-contract*</u> <u>OR "out-of-network sol"</u> <u>OR "out of network sol"</u> <u>OR "end-to-end cost contain"</u> <u>OR "un-contract"</u> <u>OR "zelis contract"</u>)) AND (zelis <u>OR Zellis</u> <u>OR Zelious</u> <u>OR Zellious</u> <u>OR Zelius</u> <u>OR Zellius</u> <u>OR Zealous</u> <u>OR zelis.com</u> <u>OR "zelis.com"</u> <u>OR @zelis</u> <u>OR "@zelis"</u> <u>OR @zelis.com</u> <u>OR "@zelis.com"</u>)
2.	((pacific W/10 AND inpatient) OR pacific inpatient medical group OR pimg OR p.i.m.g. <u>OR pacific</u>)
3.	((Frank W/10 AND Scaccia) <u>OR scaccia</u>)
4.	((Dennis W/10 AND Ayer) OR Ayer DDS <u>OR ayer</u>)
5.	(James W/10 Allen) OR James Paul Allen DDS ("ethan ciment" OR "ciment" OR "chelsea foot and ankle p.c." OR chelsea OR "chelsea foot")
6.	(Bachoua W/10 AND (Dan* OR chiro*)) OR ((dbc OR d.b.c.) AND W/10 chiro*) <u>OR bachoua</u> <u>OR dbc</u> <u>OR d.b.c.</u>)
7.	((aetna OR elevance OR humana OR (united W/5 health*) OR unitedhealth OR united healthcare OR unitedhealthcare OR uhg OR u.h.g. OR uhc OR u.h.c. OR uhcg OR u.h.c.g. <u>OR payer*</u> <u>OR payor*</u> <u>OR "dental payer"</u> <u>OR "dental payor"</u> <u>OR insur*</u> <u>OR insurer*</u> <u>OR "insurance co"</u> <u>OR TPA</u> <u>OR "t.p.a."</u> <u>OR "third-party administrat"</u> <u>OR "third party administrat"</u> <u>OR "self fund"</u> <u>OR self-fund*</u> <u>OR meritain</u> <u>OR "meritain health, inc."</u> <u>OR "meritain health"</u> <u>OR "meritain health dispute resol"</u> <u>OR cigna</u> <u>OR "the cigna group"</u> <u>OR "cigna group"</u> <u>OR "anthem blue cross of california"</u> <u>OR anthem</u> <u>OR "blue cross of california"</u> <u>OR "blue cross"</u> <u>OR BCCA</u> <u>OR "cigna health and life ins"</u> <u>OR "healthscope benefits"</u> <u>OR healthscope</u> <u>OR "health scope"</u> <u>OR "healthscope benefits, inc."</u> <u>OR "UMR, inc."</u> <u>OR "UMR inc"</u> <u>OR UMR</u>) W/25 AND (Out of Network* OR OON OR Noncontract* OR Non contract* OR Uncontract* OR Un contract* OR Nonnegotiat* OR Non-negotiat* <u>OR "outside the network"</u> <u>OR "outside of the network"</u> <u>OR "beyond the network"</u> <u>OR "out-of-network"</u> <u>OR o-o-n</u> <u>OR "o.o.n."</u> <u>OR onet</u> <u>OR "o-net"</u> <u>OR "o net"</u> <u>OR NonPar*</u> <u>OR "non-par"</u> <u>OR non-contract*</u> <u>OR "non contract"</u> <u>OR "out-of-network sol"</u> <u>OR "out of network sol"</u> <u>OR "end-to-end cost contain"</u> <u>OR "un-contract"</u> <u>OR "zelis contract"</u>)) AND (zelis <u>OR Zellis</u> <u>OR Zelious</u> <u>OR Zellious</u> <u>OR Zelius</u> <u>OR Zellius</u> <u>OR Zealous</u> <u>OR zelis.com</u> <u>OR "zelis.com"</u> <u>OR @zelis</u> <u>OR "@zelis"</u> <u>OR @zelis.com</u> <u>OR "@zelis.com"</u>)
8.	(((provider* OR doctor* OR facilit* OR hospital* <u>OR practi*</u> <u>OR "medical practic"</u> <u>OR m.d.</u> <u>OR md</u> <u>OR "doctor of osteopathic"</u> <u>OR "osteopathic doctor"</u> <u>OR "dr. of osteo"</u> <u>OR "osteopathic dr."</u> <u>OR "d.o."</u> <u>OR do</u> <u>OR "p.a."</u> <u>OR pa</u> <u>OR dds</u> <u>OR "d.d.s."</u> <u>OR dentist*</u> <u>OR dental</u> <u>OR physician*</u> <u>OR clinic*</u> <u>OR chiro*</u> <u>OR podiatry</u> <u>OR "podiatric medicine"</u> <u>OR podiatric</u> <u>OR "podiatric surgery"</u> <u>OR dpm</u> <u>OR "d.p.m."</u> <u>OR lmft</u> <u>OR "l.m.f.t."</u> <u>OR psychotherap*</u> <u>OR "psycho-therap"</u> <u>OR "psycho therap"</u> <u>OR therap*</u> <u>OR "mental health"</u>) W/25 AND (treat* OR see* OR access* OR pay* OR charg* OR bill* OR reimburs* OR allowed amount* OR pric* OR repric*) W/25 AND (Out of Network* OR OON OR Noncontract* OR Non contract* OR Uncontract* OR Un contract* OR Nonnegotiat* OR Non-negotiat* <u>OR "outside the network"</u> <u>OR "outside of the network"</u> <u>OR "beyond the network"</u> <u>OR "out-of-network"</u> <u>OR o-o-n</u> <u>OR "o.o.n."</u> <u>OR onet</u> <u>OR "o-net"</u> <u>OR "o net"</u> <u>OR NonPar*</u> <u>OR "non-par"</u> <u>OR non-contract*</u> <u>OR "non contract"</u> <u>OR "out-of-network sol"</u> <u>OR "out of network sol"</u> <u>OR</u>

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	<u>"end-to-end cost contain*" OR "un-contract*" OR "zelis contract*") AND (zelis OR Zellis OR Zelious OR Zellious OR Zelius OR Zellius OR Zealous OR zelis.com OR "zelis.com" OR @zelis OR "@zelis" OR @zelis.com OR "@zelis.com")</u>
9.	(hate* OR dislik* OR frown* OR discourag* OR "do not like" OR don't like OR "do not want*" OR don't want* OR fair OR "not fair" OR unfair OR cancel* <u>OR switch* OR "switch off" OR "switch away" OR "switch from" OR "transition away" OR "transition from" OR "end* use" OR "end* our use" OR "mov* away" OR nonrenew* OR non-renew* OR "not renew*" OR "provider react*" OR unsubscri* OR "un subscri*" OR "stop* subscri*")</u> W/25 AND (Zelis* OR zelis.com OR Zellis OR Zelious OR Zellious OR Zelius OR Zellius OR Zealous OR zelis.com OR @zelis OR "@zelis" OR @zelis.com OR "@zelis.com") AND (ERS OR established reimbursement schedule OR established reimbursement solution OR reference bas* ed <u>pric*</u> OR "e.r.s." OR e-r-s OR "e-r-s" OR "est* reimburs* schedul*" OR reprec* OR "fee schedul*" OR "est* reimburs* service*" OR "est* reimburs* sol*" OR Reference* Based Pricing OR RBP OR reference-bas* <u>pric*</u> OR referenced-bas* <u>pric*</u> OR referenced bas* <u>pric*</u> OR r.b.p. OR "r.b.p." OR r-b-p OR "r-b-p")
10.	(conspir* OR co-conspir* OR co conspir* OR cartel* OR collu* OR manipul* OR influen* OR depress* OR suppress* OR lower OR decrease OR fix* OR coordinat* OR set* OR align* <u>OR agree* OR default* OR de-fault* OR "de fault*" OR initial* OR original* OR list* OR "go above" OR adhere OR compet* OR "absence of compet*" OR "absent compet*" OR "do not compet*" OR "no longer compet*" OR "avoid compet*" OR "lack of compet*" OR "decreased levels of compet*" OR "lessened compet*" OR "relief from compet*" OR "relieved from compet*" OR "competitive relie*"</u> OR violat* OR antitrust* OR "anti-trust*" OR "anti trust*" OR "co-ordinat*" OR "co ordinat*" OR "anti-compet*" OR anticompet* OR "anti compet*") W/25 AND (Zelis* OR zelis.com OR Zellis OR Zelious OR Zellious OR Zelius OR Zellius OR Zealous OR zelis.com OR @zelis OR "@zelis" OR @zelis.com OR "@zelis.com" OR ERS OR established reimbursement schedule OR established reimbursement solution OR reference bas* ed <u>pric*</u> OR "e.r.s." OR e-r-s OR "e-r-s" OR "est* reimburs* schedul*" OR "fee schedul*" OR "est* reimburs* service*" OR "est* reimburs* sol*" OR reprec* OR Reference* Based Pricing OR RBP OR reference-bas* <u>pric*</u> OR reference bas* <u>pric*</u> OR referenced-bas* <u>pric*</u> OR r.b.p. OR "r.b.p." OR r-b-p OR "r-b-p")
11.	(DeSantis Breindel <u>OR desantisbreindel OR desantisbreindel@ OR "desantisbreindel@" OR desantis OR breindel OR "de santis breindel" OR "de santis" OR Availity OR availity OR avail* OR AHIP OR America* Health Insurance Plan* OR a.h.i.p. OR "a.h.i.p." OR "america's health insurance plan*" OR "american health insurance plan*" OR "america* health ins* plan*")</u> W/25 AND (Out of Network* OR OON OR Noncontract* OR Non contract* OR Uncontract* OR Un contract* OR Nonnegotiat* OR Non-negotiat*} <u>OR "outside the network" OR "outside of the network" OR "beyond the network" OR "out-of-network" OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR NonPar* OR "non-par*" OR non-contract* OR "non contract*" OR "out-of-network sol*" OR "out of network sol*" OR "end-to-end cost contain*" OR "un-contract*" OR "zelis contract*")</u>
12.	(role* OR responsib* OR assign* OR delegat* OR supplant* OR authori* OR capacit*) W/25 AND (Zelis* OR zelis.com OR Zellis OR Zelious OR Zellious OR Zelius OR Zellius OR Zealous OR zelis.com OR @zelis OR "@zelis" OR @zelis.com OR "@zelis.com" OR ERS OR established reimbursement schedule OR established reimbursement solution OR reference bas* ed <u>pric*</u> OR "e.r.s." OR e-r-s OR "e-r-s" OR "est* reimburs* schedul*" OR "fee schedul*" OR "est* reimburs* service*" OR "est* reimburs* sol*" OR Reference* Based Pricing OR RBP OR reference-bas* <u>pric*</u> OR referenced-bas* <u>pric*</u> OR referenced bas* <u>pric*</u> OR r.b.p. OR "r.b.p." OR r-b-p OR "r-b-p")
13.	(collu* OR conspir* OR coconspir* OR co-conspir* OR co conspir* OR cartel* OR fix* OR compet* OR absence of compet* OR absent compet* OR "do not compet*" OR no longer compet* OR avoid compet* OR lack of compet* OR decreased levels of compet* OR lessened compet* OR relief from compet* OR relieved from compet* OR competitive relie* OR coordinat*) W/50 AND (Zelis* OR zelis.com OR <u>Zellis OR Zelious OR Zellious OR Zelius OR Zellius OR Zealous OR zelis.com OR @zelis</u>

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	OR "@zelis" OR @zelis.com OR "@zelis.com" OR ERS OR established reimbursement schedule OR established reimbursement solution OR reference based price OR "e.r.s." OR e-r-s OR "e-r-s" OR "est* reimburs* schedul*" OR "fee schedul*" OR "est* reimburs* service*" OR "est* reimburs* sol*" OR Reference* Based Pricing OR RBP OR reference-bas* pric* OR reference bas* pric* OR referenced bas* pric* OR r.b.p. OR "r.b.p." OR r-b-p OR "r-b-p")
14.	(established reimbursement schedule OR established reimbursement service* OR established reimbursement solution* OR ers OR e.r.s. OR e-r-s OR reference-based pric* OR reference based pricing OR referenced based pric* OR referenced base pric* OR rbp OR r.b.p. OR r-b-p OR "fee schedul*") W/25AND (zelis* OR zelis.com OR Zellis OR Zelious OR Zellious OR Zeliu* OR Zellius OR Zealous OR zelis.com OR @zelis OR "@zelis" OR @zelis.com OR "@zelis.com")
15.	(ingenix OR ingenix database) OR (ingenix W/25AND (new york attorney general* OR nyag* OR n.y.a.g. OR state of new york OR office of the attorney general*) OR oag* OR o.a.g. OR "o.a.g." OR <u>cuomo</u> OR "ag office" OR "ag's office" OR "a.g. office" OR "a.g.'s office")
16.	(zelis OR Zellis OR Zelious OR Zellious OR Zeliu* OR Zellius OR Zealous OR zelis.com OR @zelis OR "@zelis" OR @zelis.com OR "@zelis.com") W/25AND (rebrand* OR re-brand* OR "new* brand*" OR nam* OR renam* OR re-nam* OR "re-nam*" OR "re nam*" OR "new* nam*" OR June 13, 2016 OR 06/13/2016 OR 06/13/16 OR 6/13/2016 OR 6/13/16 OR 2016 June 13 OR 06-13-2016 OR 06-13-16 OR 6-13-2016 OR 6-13-16 OR 06.13.2016 OR 6.13.2016 OR 06.13.16 OR 6.13.2016)
17.	(fairhealth OR fair-health OR fair health) OR non-profit* OR "non-profit*" OR "non profit*" OR not-for-profit* OR "not-for-profit*" OR "not for profit*")
18.	(fair health OR fair-health OR fairhealth OR non-profit* OR "non-profit*" OR "non profit*" OR not-for-profit* OR "not-for-profit*" OR "not for profit*") W/25AND (expir* OR end* OR terminat* OR exclusive use* OR exclusive-use* OR exclu* OR five year* OR five-year* OR five yr* OR five-yr* OR 5 year* OR 5-year* OR 5 yr* OR 5-yr* OR june 13, 2016 OR jun 13 2016 OR jun-13-2016 OR 13 June 2016 OR 13 jun 2016 OR 13-jun-2016 OR 6/13/2016 OR 6/13/16 OR 6-13-2016 OR 6.13.2016 OR 6.13.16 OR 20160613 OR 2016-06-13 OR 2016.06.13) OR "august 13, 2024" OR "aug. 13, 2024" OR "aug 13, 2024" OR aug-13-2024 OR "13 august 2024" OR "13 aug 2024" OR 13-aug-2024 OR 8/13/2024 OR 8.13.2024 OR 20240813 OR 2024-08-13 OR 2024.08.13)
19.	(zelis* OR zelis.com OR Zellis OR Zelious OR Zellious OR Zeliu* OR Zellius OR Zealous OR zelis.com OR @zelis OR "@zelis" OR @zelis.com OR "@zelis.com") W/25AND (established reimbursement schedule OR established reimbursement service* OR established reimbursement solution* OR ers OR e.r.s. OR e-r-s OR reference-based pric* OR reference based pricing OR referenced based pric* OR referenced base pric* OR rbp OR r.b.p. OR r-b-p OR OON OR Noncontract* OR Non contract* OR Uncontract* OR Un contract* OR Nonnegotiat* OR Non-negotiat*) OR "fee schedul*" OR "outside the network" OR "outside of the network" OR "beyond the network" OR "out-of-network" OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR NonPar* OR "non-par*" OR non-contract* OR "non contract*" OR "out-of-network sol*" OR "out of network sol*" OR "end-to-end cost contain*" OR "un-contract*" OR "zelis contract*")
20.	(zelis forum) OR (Zelis W/10 OR Zellis OR Zelious OR Zellious OR Zeliu* OR Zellius OR Zealous OR zelis.com OR @zelis OR "@zelis" OR @zelis.com OR "@zelis.com") AND (forum OR "hyatt regency lost pines resort and spa" OR boca raton OR retreat* OR conference*) OR (fora* OR "lost pines resort" OR "lost pines resort and spa" OR "lost pines resort & spa" OR "hyatt regency lost pines resort & spa" OR hyatt OR regency OR "boca raton" OR retreat* OR "annual confer*" OR "client* Confer*" OR "customer* Confer*" OR "payer* confer" OR "payor* Confer*" OR "corporate event*" OR "indus* Event*" OR "payer* Event*" OR "payor* Event*" OR "executiv* Event*")
21.	(Zelis OR zelis* OR zelis.com OR Zellis OR Zelious OR Zellious OR Zeliu* OR Zellius OR Zealous OR zelis.com OR @zelis OR "@zelis" OR @zelis.com OR "@zelis.com") AND W/25 (client conference* OR attend* OR attend* list* OR confirm* OR invit* OR invit* list* OR committee* OR travel* OR

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	hotel receipt* OR restaurant receipt* OR bar* OR bar receipt* OR photo OR picture* OR reserve* OR receipt* OR yoga OR golf* OR ski* OR fish* OR swim* OR happy hour* OR happy-hour* OR cocktail* OR cock-tail* OR cock tail* OR excursion OR music* OR (magic W/102 johnson) OR comed* OR post* OR (Jason W/102 sudeikis) OR sudeikis} <u>OR conference* OR note* OR client* OR customer* OR payer* OR payor* OR transcri* OR audio* OR record* OR "audio record*" OR "video record*" OR video OR "visual record*" OR activit* OR resort* OR hotel* OR restaurant* OR receipt*)</u>
22.	<u>(levance OR "anthem blue cross of california" OR anthem OR "blue cross of california" OR "blue cross" OR BCCA) W/25 AND</u> (client conference* OR conference* OR attend* OR attend* list* OR confirm* OR invit* OR invit* list* OR committee* OR travel* OR hotel receipt* OR restaurant receipt* OR bar* OR bar receipt* OR photo OR picture* OR reserve* OR receipt* OR yoga OR golf* OR ski* OR fish* OR swim* OR happy hour* OR happy- hour* OR cocktail* OR cock-tail* OR cock tail* OR excursion OR activit* OR music* OR (magic W/102 johnson) OR comed* OR post* OR (Jason W/102 sudeikis) OR sudeikis} <u>OR note* OR client* OR customer* OR payer* OR payor* OR transcri* OR audio* OR record* OR "audio record*" OR "video record*" OR video OR "visual record*" OR activit* OR resort* OR film OR hotel* OR restaurant OR receipt*)</u>
23.	humana W/25 AND (client conference* OR conference* OR attend* OR attend* list* OR confirm* OR invit* OR invit* list* OR committee* OR travel* OR hotel receipt* OR restaurant receipt* OR bar* OR bar receipt* OR photo OR picture* OR reserve* OR receipt* OR yoga OR golf* OR ski* OR fish* OR swim* OR happy hour* OR happy- hour* OR cocktail* OR cock-tail* OR cock tail* OR excursion OR activit* OR music* OR (magic W/102 johnson) OR comed* OR post* OR (Jason W/102 sudeikis) OR sudeikis} <u>OR note* OR client* OR customer* OR payer* OR payor* OR transcri* OR audio* OR record* OR "audio record*" OR "video record*" OR video OR "visual record*" OR activit* OR resort* OR film OR hotel* OR restaurant*)</u>
24.	<u>(aetna meritain OR "meritain health, inc." OR "meritain health" OR "meritain health dispute resol*" OR "healthscope benefits" OR healthscope OR "health scope" OR "healthscope benefits, inc.") W/25 AND</u> (client conference* OR conference* OR attend* OR attend* list* OR confirm* OR invit* OR invit* list* OR committee* OR travel* OR hotel receipt* OR restaurant receipt* OR bar* OR bar receipt* OR photo OR picture* OR reserve* OR receipt* OR yoga OR golf* OR ski* OR fish* OR swim* OR happy hour* OR happy-hour* OR cocktail* OR cock-tail* OR cock tail* OR excursion OR activit* OR music* OR (magic W/102 johnson) OR comed* OR post* OR (Jason W/102 sudeikis) OR sudeikis} <u>OR note* OR client* OR customer* OR payer* OR payor* OR transcri* OR audio* OR record* OR "audio record*" OR "video record*" OR video OR "visual record*" OR activit* OR resort* OR film OR hotel* OR restaurant*)</u>
25.	<u>((united W/103 health*) OR unitedhealth OR united healthcare OR unitedhealthcare OR uhg OR u.h.g. OR uhc OR u.h.c. OR uhcg OR u.h.c.g. OR "UMR, inc." OR "UMR inc" OR "UMR") W/25 AND</u> (client conference* OR conference* OR attend* OR attend* list* OR confirm* OR invit* OR invit* list* OR committee* OR travel* OR hotel receipt* OR restaurant receipt* OR bar* OR bar receipt* OR photo OR picture* OR reserve* OR receipt* OR yoga OR golf* OR ski* OR fish* OR swim* OR happy hour* OR happy- hour* OR cocktail* OR cock-tail* OR cock tail* OR excursion OR activit* OR music* OR (magic W/102 johnson) OR comed* OR post* OR (Jason W/102 sudeikis) OR sudeikis} <u>OR note* OR client* OR customer* OR payer* OR payor* OR transcri* OR audio* OR record* OR "audio record*" OR "video record*" OR video OR "visual record*" OR activit* OR resort* OR film OR hotel* OR restaurant*)</u>
26.	(violat* OR antitrust* OR anti-trust OR conspir* OR coconspir* OR co-conspir* OR co conspir* OR collud* OR cartel* OR fix* OR coordinat* OR anti-compet* OR anticompet* OR compet* <u>OR "trade regulation*" OR regulat* OR handbook* OR hand-book* OR "hand book*" OR manual* OR "antitrust train*" OR "anti-trust train*" OR "antitrust guid*" OR "anti-trust guid*" OR "sherman act" OR "section 1" OR "sec. 1" OR "15 u.s.c. § 1" OR "clayton act" OR "section 16" OR "sec. 16" OR</u>

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	<u>"15 u.s.c. § 26")</u> W/25AND (Zelis* OR zelis.com OR ERS OR established reimbursement schedule OR established reimbursement solution OR reference based pric* <u>OR "e.r.s." OR e-r-s OR "e-r-s" OR "est* reimburs* schedul*" OR "fee schedul*" OR "est* reimburs* service*" OR "est* reimburs* sol*" OR Reference* Based Pricing OR RBP OR reference-bas* pric* OR reference bas* pric* OR referenced bas* pric* OR r.b.p. OR "r.b.p." OR r-b-p OR "r-b-p")</u>)
27.	((balance W/5 bill*) <u>OR "balance* bill*" OR "bal* bill*" OR "bill* the bal*" OR "balance* bill* navigat*" OR "gap bill*" OR "gap* invoic*" OR "deficien* claim" OR "claim deficien*" OR "bill* differen*" OR "differen* in invoic*")</u> W/25AND (Out of Network* OR OON OR Noncontract* OR Non contract* OR Uncontract* OR Un contract* OR Nonnegotiat* OR Non-negotiat* <u>OR "outside the network" OR "outside of the network" OR "beyond the network" OR "out-of-network" OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR NonPar* OR "non-par*" OR non-contract* OR "non contract*" OR "out-of-network sol*" OR "out of network sol*" OR "end-to-end cost contain*" OR "un-contract*" OR "zelis contract*")</u>)
28.	<u>("4 missing peace" OR "4 missing peace corps, Inc." OR "the missing peace center" OR "missing peace" OR "rhodes-levin" OR "chris laurence" OR Laurence)</u>
29.	<u>("out of network" OR OON OR "out of area" OR OOA OR NonPar* OR Non-Par* OR "outside the network" OR "outside of the network" OR "beyond the network" OR "out of network" OR "out-of-network" OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR "non-par*" OR non-contract* OR noncontract* OR "non contract*" OR "out-of-network sol*" OR "out of network sol*" OR "end-to-end cost contain*" OR "un contract*" OR uncontract* OR "un-contract*" OR "zelis contract*")</u> AND (marketshare* OR market share* OR "geograph* adjust*" OR "geograph* scop*" OR "geograph* reach*" OR "geograph* area*" OR "geograph* market*")
30.	<u>("health maintenance org*" OR "health maintenance network*" OR hmo* OR "h.m.o." OR "health management org*" OR "health mgmt. org*" OR "health mgmt org*")</u>
31.	<u>(exclu* OR "not accept" OR unaccept* OR "un-accept*" OR "not see" OR "not treat" OR refus* OR declin* OR cancel* OR "turn* away") AND ("out of network" OR OON OR "out of area" OR OOA OR NonPar* OR Non-Par* OR "outside the network" OR "outside of the network" OR "beyond the network" OR "out of network" OR "out-of-network" OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR "non-par*" OR non-contract* OR noncontract* OR "non contract*" OR "out-of-network sol*" OR "out of network sol*" OR "end-to-end cost contain*" OR "un contract*" OR uncontract* OR "un-contract*" OR "zelis contract*")</u>
32.	<u>(freedom* OR flex* OR choic* OR choos* OR "pa* more" OR compens* OR "pay more" OR "paid more" OR "pays more" OR "paying more" OR "increas* payment*" OR "increas* benefi*" OR "greater benefi*" OR "pa* less" OR "decreas* pa*" OR "decreas* benefi*" OR "smaller benefi*" OR "less cover*" OR "more cover*" OR "smaller rat*" OR "greater rat*" OR "decreas* rat*") AND ("out of network" OR OON OR "out of area" OR OOA OR NonPar* OR Non-Par* OR "outside the network" OR "outside of the network" OR "beyond the network" OR "out of network" OR "out-of-network" OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR "non-par*" OR non-contract* OR noncontract* OR "non contract*" OR "out-of-network sol*" OR "out of network sol*" OR "end-to-end cost contain*" OR "un contract*" OR uncontract* OR "un-contract*" OR "zelis contract*")</u>
33.	<u>("market rat*" OR market-rat* OR "full rat*" OR "compet* rat*" OR invoic* OR "full invoic*" OR "as invoic*" OR "as-invoic*" OR "market pric*" OR "full pric*" OR market*)</u>
34.	<u>(shar* OR sen* OR distribut* OR giv* OR gav* OR deliver* OR exchang* OR provid* OR communicat* OR discuss* OR convers* OR tell* OR told* OR speak* OR spok* OR talk* OR phon* OR telephon* OR tele-phon* OR "tele-phon*" OR call* OR email* OR e-mail* OR "e-mail*" OR text* OR attach* OR feed* OR trad* OR disclos* OR met* OR meet* OR know* OR knew* OR understand* OR understood* OR famil* OR recog* OR contemplat* OR consid* OR assess* OR evaluat* OR valu* OR analy* OR concern* OR saw* OR see* OR tell* OR told* OR discuss* OR</u>

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	<u>convers* OR talk* OR speak* OR spok* OR met* OR meet* OR confer* OR consult* OR counsel* OR council* OR meeting* OR show* OR reveal* OR present* OR demonstrat* OR communicat* OR discuss*) AND ("out of network" OR OON OR "out of area" OR OOA OR NonPar* OR Non-Par* OR "outside the network" OR "outside of the network" OR "beyond the network" OR "out of network" OR "out-of-network" OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR "non-par*" OR non-contract* OR noncontract* OR "non contract*" OR "out-of-network sol*" OR "out of network sol*" OR "end-to-end cost contain*" OR "un contract*" OR uncontract* OR "un-contract*" OR "zelis contract*")</u>
35.	<u>(incent* OR encourag* OR max* OR commission* OR bount* OR incom* OR revenu* OR sav* OR extract* OR "percentage of sav*" OR "%sav*" OR "% sav*" OR "% of sav*" OR posv* OR posav* OR "psav*" OR "p.o.s.v." OR "sav* rat*" OR "rat* of sav*") AND ("out of network" OR OON OR "out of area" OR OOA OR NonPar* OR Non-Par* OR "outside the network" OR "outside of the network" OR "beyond the network" OR "out of network" OR "out-of-network" OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR "non-par*" OR non-contract* OR noncontract* OR "non contract*" OR "out-of-network sol*" OR "out of network sol*" OR "end-to-end cost contain*" OR "un contract*" OR uncontract* OR "un-contract*" OR "zelis contract*")</u>
36.	<u>(percent* OR pct* OR % OR amount* OR ceiling* OR cap* OR caps OR floor* OR threshold* OR threshhold* OR thresh-hold* OR "thresh-hold*" OR "thresh hold*" OR cliff* OR crater* OR limit* OR fix* OR set* OR default* OR de-fault* OR "de fault*" OR initial* OR original* OR list* OR "no more than" OR "no less than" OR "more than" OR "less than" OR "higher rat*" OR "lower rat*" OR "original* pa* amount*" OR "initial* pa* amount*" OR mac OR "m.a.c." OR "max* allow* charg*" OR "max* allow* cost*" OR "max* allow* reimbur*" OR "allow* amount*" OR "amount* allow*" OR "reimburs* level*" OR "level of reimburs*") AND ("out of network" OR OON OR "out of area" OR OOA OR NonPar* OR Non-Par* OR "outside the network" OR "outside of the network" OR "beyond the network" OR "out of network" OR "out-of-network" OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR "non-par*" OR non-contract* OR noncontract* OR "non contract*" OR "out-of-network sol*" OR "out of network sol*" OR "end-to-end cost contain*" OR "un contract*" OR uncontract* OR "un-contract*" OR "zelis contract*")</u>
37.	<u>(tool* OR method* OR tech* OR databas* OR data-bas* OR "data-bas*" OR "data bas*" OR dbas* OR d-bas* OR "d-bas*" OR schedul* OR "survey data" OR "raw data" OR "underlying data" OR "source data" OR "est* reimburs* schedul*" OR "fee schedul*" OR "est* reimburs* service*" OR "est* reimburs* sol*" OR ers OR "e.r.s." OR e-r-s OR "e-r-s" OR "reference-bas* pric*" OR "reference bas* pric*" OR "referenced-bas* pric*" OR "referenced bas* pric*" OR rbp OR r.b.p. OR "r.b.p." OR r-b-p OR "r-b-p" OR "auto* rout*" OR "a.i." OR "ai" OR "artificial* intelligen*" OR "gen* a.i." OR "gen* ai" OR "gen-ai" OR "gen-a.i." OR "machin* learn*")</u>
38.	<u>("independent database*" OR "not-for-profit compan*" OR "not for profit compan*" OR "non-profit compan*" OR "non profit compan*" OR "fair health" OR "five year*" OR five-year* OR "five yr*" OR five-yr* OR "5 year*" OR 5-year* OR "5 yr*" OR 5-yr* OR "exclus* period*" OR "exclus* term*" OR "exclus* us*" OR "fair market*" OR "reasonable and customary" OR "r and c" OR "r & c" OR "usual, customary and reasonable" OR "usual, customary, and reasonable" OR ucr OR ucr OR u.c.r. OR "usual, customary & reasonable" OR "customary & reasonable" OR "customary and reasonable" OR "usual and customary" OR "usual & customary" OR "usual & reasonable" OR "usual & customary" OR "market rat*")</u>
39.	<u>(500 OR "five hundred" OR five-hundred OR "five-hundred" OR 750 OR "seven hundred fifty" OR seven-hundred-fifty OR "seven-hundred-fifty" OR 770 OR "seven hundred seventy" OR seven-hundred-seventy OR "seven-hundred-seventy" OR "top 5" OR top-5 OR "top-5" OR "top five" OR top-five OR "top-five")</u>

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40.	<u>(contract* OR s.o.w. OR "s.o.w." OR "sow*" OR "statement* of work*" OR "stmt* of work*" OR amend* OR "side letter*" OR "side-letter*" OR agree* OR "mou" OR m.o.u. OR "m.o.u." OR "moa" OR "m.o.a." OR "m.o.a." OR loi OR l.o.i. OR "l.o.i." OR "loa" OR l.o.a. OR "l.o.a.") AND ("out of network" OR OON OR "out of area" OR OOA OR NonPar* OR Non-Par* OR "outside the network" OR "outside of the network" OR "beyond the network" OR "out of network" OR "out-of-network" OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR "non-par*" OR non-contract* OR noncontract* OR "non contract*" OR "out-of-network sol*" OR "out of network sol*" OR "end-to-end cost contain*" OR "un contract*" OR uncontract* OR "un-contract*" OR "zelis contract*")</u>
41.	<u>(antitrust OR anti-trust OR "trade regulation*" OR regulat* OR handbook* OR hand-book* OR "hand book*" OR manual* OR "antitrust train*" OR anti-trust train* OR "antitrust guid*" OR "anti-trust guid*" OR "antitrust publi*" OR "anti-trust publi*" OR "antitrust email*" OR "anti-trust email*" OR "anti-trust e-mail*" OR "antitrust protocol*" OR "anti-trust protocol*" OR "authorit* on antitrust" OR "authorit* on anti-trust" OR "antitrust author*" OR "anti-trust author*" OR "antitrust report*" OR "anti-trust report*" OR "sherman act" OR "section one" OR "section 1" OR "sec. one" OR "sec. 1" OR "§ one" OR "§ 1" OR "15 u.s.c. section one" OR "15 u.s.c. section 1" OR "15 u.s.c. sec. one" OR "15 u.s.c. sec. 1" OR "15 u.s.c. § one" OR "15 u.s.c. § 1" OR "clayton act" OR "section sixteen" OR "section 16" OR "sec. sixteen" OR "sec. 16" OR "§ 16" OR "15 u.s.c. section twenty-six" OR "15 u.s.c. section twenty six" OR "15 u.s.c. section 26" OR "15 u.s.c. sec. twenty-six" OR "15 u.s.c. sec. twenty six" OR "15 u.s.c. sec. 26" OR "15 u.s.c. § twenty-six" OR "15 u.s.c. § twenty six" OR "15 u.s.c. § 26" OR "§ 26")</u>
42.	<u>(Bain OR "Bain Capital" OR Parthenon OR "Parthenon Capital" OR Mubadala OR "Mubadala Investment Company" OR HarbourVest OR HarborVest OR Guidehouse OR "Office Ally" OR "private equity" OR invest* OR loan* OR credit*) AND (Zelis OR Zellis OR Zelious OR Zellious OR Zelius OR Zellius OR Zealous OR zelis.com OR "zelis.com" OR control* OR leverag* OR steer* OR oblig* OR dictat* OR restrict*) AND (out of network OR OON OR out of area OR OOA OR NonPar* OR Non-Par* OR "out of network" OR "outside the network" OR "outside of the network" OR "beyond the network" OR "out of network" OR "out-of-network" OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR "non-par*" OR non-contract* OR noncontract* OR "non contract*" OR "out-of-network sol*" OR "out of network sol*" OR "end-to-end cost contain*" OR "un contract*" OR uncontract* OR "un-contract*" OR "zelis contract*")</u>
43.	<u>(pric* OR cost* OR expen* OR amount* OR level* OR reprec* OR re-pric* OR "re pric*" OR paid* OR pay* OR payment* OR satisf* OR settl* OR assur* OR discontinu* OR "executive law*" OR ceas* OR desist* OR "exclusiv* us*" OR exclusive-us* OR exclusiv* OR "five year*" OR five-year* OR "five-year*" OR "five yr*" OR five-yr* OR "five-yr*" OR "5 year*" OR 5-year* OR "5-year*" OR "5 yr*" OR 5-yr* OR "5-yr*" OR increas* OR revers* OR climb* OR "26%" OR "13%")</u>
44.	<u>("500 health*" OR "750 health*" OR "770 health*" OR "500 insur*" OR "750 insur*" OR "770 insur*" OR "500 nat*" OR "750 nat*" OR "500 payor*" OR "750 payor*" OR "770 payor*" OR "500 payer*" OR "750 payer*" OR "770 payer*" OR "500 client*" OR "750 client*" OR "770 client*" OR "500 customer*" OR "750 customer*" OR "770 customer*" OR "500 repricing client*" OR "750 repricing client*" OR "770 repricing client*" OR "500 repricing customer*" OR "750 repricing customer*" OR "770 repricing customer*" OR "repricing client*" OR "repricing customer*" OR "top five" OR "top-five" OR "top 5" OR "five top" OR "5 top" OR "largest five" OR "largest 5" OR "five largest" OR "5 largest" OR "biggest five" OR "biggest 5" OR "five biggest" OR "5 biggest")</u>
45.	<u>("artificial intelligence" OR "artificial* intel*" OR artificial-intelligence OR "artificial-intel*" OR a.i. OR "a.i." OR ai OR a-i OR "a-i" OR algorithm* OR algo* OR auto* OR rout* OR channel* OR method* OR methodolog* OR tech* OR proced* OR process* OR sys* OR business* OR "ai-power*")</u>

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46.	<u>(stratose* OR strat-ose* OR stratrose* OR strat-rose* OR phx OR p.h.x. OR "pay-plus solutions" OR payplussolutions OR "payplus solutions" OR "pay plus solutions" OR pps OR p.p.s. OR truven OR trueven OR "tru ven" OR "true ven" OR ethicare OR ethi-care OR "ethi care" OR strenuus OR strennus OR strennuus OR strenuous OR strennuous OR maverest OR mavarest OR meverest OR netminder OR net-minder OR "net minder" OR redcard OR red-card OR "red card" OR "sapphire digital" OR sapphire-digital OR sapphiredigital OR "saphire digital" OR saphire-digital OR sapphiredigital OR medxoom OR medzoom OR med-xoom OR med-zoom OR "med xoom" OR "med zoom" OR payspan OR "pay-span" OR "pay span" OR allied OR "allied benefit*" OR "strategic partner") AND (zelis* OR Zellis OR Zelious OR Zellious OR Zelius OR Zellius OR Zealous OR zelis.com OR @zelis OR "@zelis" OR @zelis.com OR "@zelis.com")</u>
47.	<u>(compen* OR money* OR monet* OR incent* OR schem* OR earning* OR income* OR revenue* OR commission* OR percent* OR amount* OR level* OR pos OR posv OR posav OR "percentage of saving*" OR "pct* of sav*" OR "pctsav*" OR pctofsav* OR pct of sav* OR pct.of.sav* OR %sav* OR "% of sav*")</u>
48.	<u>((shar* OR sen* OR distribut* OR exchang* OR communicat* OR discuss* OR disclos* OR transfer* OR deliver* OR upload* OR download* OR portal*) AND ("competitively sensitive" OR "commercially sensitive" OR confid* OR proprietar* OR claim* OR pric* OR rate* OR reimburs* OR reprec* OR cost* OR payment* OR sav* OR data*))</u>
49.	<u>(pa* OR contract* OR sensitiv* OR "competitively sensitive" OR competitively-sensitive OR "commercially sensitive" OR commercially-sensitive OR csi* OR c.s.i. OR "c.s.i." OR c-s-i* OR "c-s-i" OR priv* OR confid* OR proprietar* OR claim* OR pric* OR sav* OR expen* OR cost* OR information* OR info* OR data* OR datum*)</u>
50.	<u>(architect* OR "national network*" OR "nat'l network*" OR "natl network*" OR "nationwide network*" OR "regional network*" OR "area network*" OR "local network*" OR "provider network*" OR "dental network architect*" OR "healthcare network architect*" OR "dental network*" OR "healthcare network*" OR "network* architect*" OR "primary network*" OR "secondary network*" OR "wrap network*" OR "rental network*" OR "supplement* network*" OR "specialty network*" OR "proprietary network*" OR "model preferred provider network*" OR "design preferred provider network*" OR "build preferred provider network*" OR "model ppo*" OR "design ppo*" OR "build ppo*" OR "model p.p.o*" OR "design p.p.o*" OR "build p.p.o*" OR "network analytic*" OR "network design*" OR "network* access*" OR "network* sav*" OR "network* pay*" OR "network* communic*" OR "network* manag*" OR "claim* integrit*" OR "pa* remit*" OR "our network*" OR "your network*")</u>
51.	<u>(compet* OR own* OR operat* OR manag* OR run* OR supervis* OR control* OR "purcha* out-of-network*" OR "purcha* out of network*" OR "purcha* OON" OR "purcha* o.o.n." OR "purcha* o-o-n" OR "purcha* onet*" OR "purcha* o-net*" OR "purcha* o net*" OR "purcha* non-par*" OR "purcha* non par*" OR "purcha* not par*" OR "buy* out-of-network*" OR "buy* out of network*" OR "buy* OON" OR "buy* o.o.n." OR "buy* o-o-n" OR "buy* onet*" OR "buy* o-net*" OR "buy* o net*" OR "buy* non-par*" OR "buy* non par*" OR "buy* not par*" OR "bought* out-of-network*" OR "bought* out of network*" OR "bought* OON" OR "bought* o.o.n." OR "bought* o-o-n" OR "bought* onet*" OR "bought* o-net*" OR "bought* o net*" OR "bought* non-par*" OR "bought* non par*" OR "bought* not par*" OR "preferred provider organization*" OR "preferred provider organisation*" OR "preferred provider network*" OR p.p.o. OR "p.p.o." OR p-p-o* OR "p-p-o*" OR ppo*)</u>
52.	<u>("payment* harmon* ind*" OR phi OR p.h.i. OR "p.h.i." OR quickreprec* OR "quick reprec*" OR quick-reprec* OR "quick-reprec*" OR network360 OR "network 360" OR network-360 OR "network-360" OR "zelis pric* map*" OR "open access pric*" OR "intel* pric* platform*" OR zipp OR z.i.p.p.</u>

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	<u>OR "z.i.p.p." OR "oon sol*" OR "out of network sol*" OR "out-of-network sol*" OR "o.o.n. sol*" OR "o-o-n sol*" OR "onet sol*" OR "o-net sol*" OR "o net sol*")</u>
53.	<u>(report* OR data* OR "quant* survey*" OR generat* OR writ* OR draft* OR summar* OR author* OR explain* OR present* OR memo* OR artic* OR document* OR "doc*" OR ".doc" OR ".docx" OR "white paper*" OR whitepaper* OR white-paper* OR powerpoint* OR power-point* OR "power-point*" OR ppt* OR .ppt OR ".ppt" OR "white-paper*" OR blog* OR websit* OR web-sit* OR "web-sit*" OR "web sit*" OR media OR deliverab* OR metric* OR scor* OR index OR indic* OR dashboard* OR dash-board* OR "dash board*" OR stud* OR projection* OR estimat* OR model*) AND ("out of network" OR OON OR "out of area" OR OOA OR NonPar* OR Non-Par* OR "outside the network" OR "outside of the network" OR "beyond the network" OR "out of network" OR "out-of-network" OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR "non-par*" OR non-contract* OR noncontract* OR "non contract*" OR "out-of-network sol*" OR "out of network sol*" OR "end-to-end cost contain*" OR "un contract*" OR uncontract* OR "un-contract*" OR "zelis contract*")</u>
54.	<u>(investigat* OR "department of justice" OR "dep't of justice" OR "dept* of justice" OR doj OR d.oj. OR "d.o.j." OR "grand jur*" OR dol OR d.o.l. OR "d.o.l." OR "department of labor" OR "dep't of labor" OR "dept* of labor*" OR congress* OR "federal trade commission" OR ftc OR "f.t.c." OR senat* OR "house of represent*" OR h.r. OR "h.r." OR fbi OR f.b.i. OR "federal bureau of investigat*" OR "state investigat*")</u>
55.	<u>(disput* OR appeal* OR adjudicat* OR submi* OR accept* OR reject* OR negotiat* OR renegotiat* OR re-negotiat* OR "re-negotiat*" OR "re negotiat*" OR parameter* OR "appeal* parameter*" OR "appellat* parameter*" OR discuss* OR adjust* OR reten* OR "reten* rate*" OR "initial payment offer*" OR "original payment offer*" OR "inquiry rat*" OR "claims negotiat*" OR reprocess* OR re-process* OR "re-process*" OR "re process*" OR "best and final" OR "final and best" OR "negotiat* discount*" OR post-repric* OR "post-repric*" OR "post repric*") AND ("out of network" OR OON OR "out of area" OR OOA OR NonPar* OR Non-Par* OR "outside the network" OR "outside of the network" OR "beyond the network" OR "out of network" OR "out-of-network" OR OON OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR "non-par*" OR non-contract* OR noncontract* OR "non contract*" OR "out-of-network sol*" OR "out of network sol*" OR "end-to-end cost contain*" OR "un contract*" OR uncontract* OR "un-contract*" OR "zelis contract*")</u>
56.	<u>("transparency in coverage" OR tic OR t.i.c. OR "t.i.c." OR t-i-c OR "t-i-c" OR "transparency in coverage rule*" OR "tic rule*" OR "t.i.c. rule*" OR "t-i-c rule*" OR "machine-readable file*" OR mrf OR m.r.f. OR "m.r.f." OR m-r-f OR "m-r-f" OR compl* OR "tic mrf files" OR "t.i.c. m.r.f." OR "mrf creat*" OR "m.r.f. creat*")</u>
57.	<u>(director* OR consult* OR advisor* OR adviser* OR "board member*" OR member* OR board* OR "board meet*" OR "advisor* board" OR "adviser* board" OR itenerar* OR "advisor* committee*" OR "adviser* committee*" OR "committee advis*" OR "board advisor*" OR "director* advisor*" OR "director* adviser*" OR "meet* notes" OR minute* OR veto* OR vote* OR "board consult*" OR "consult* to the board*" OR "strategic advi*") AND (Zelis OR Zellis OR Zelious OR Zellious OR Zelius OR Zellius OR Zealous OR zelis.com OR "zelis.com")</u>
58.	<u>("claim* pass*" OR claimpass OR claim-pass* OR "claim-pass*" OR cps OR c.p.s. OR "c.p.s." OR cpsp OR c.s.p.s. OR "c.s.p.s." OR "supp* network* serv*" OR "accelerat* pa*" OR "ap program*" OR "a.p. program*" OR "ap network*" OR "a.p. network*" OR "medical reimbursement analysis service*" OR "professional negotiat* serv*" OR "prof'l negotiat* serv*" OR pns OR p.n.s. OR "p.n.s." OR ppns OR p.p.n.s. OR "p.p.n.s." OR "continuous discount* agreement*" OR cda OR c.d.a. OR "c.d.a.")</u>
59.	<u>(profit* OR earning* OR "net earning*" OR incom* OR "net incom*" OR revenu* OR net revenu* OR money* OR monet* OR currenc* OR dollar* OR usd OR u.s.d. OR "u.s.d." OR "financial health*")</u>

Search No.	Plaintiffs' 8/25/26 Revisions and Additions to Cigna's 7/1/26 Proposed Search Terms
	OR "in the red" OR "in the black" OR "in the money" OR cash* OR "cash equivalent*" OR holding* OR invest* OR "short term" OR short-term OR "long term" OR long-term OR saving* OR sav* OR "earnings before income tax, depreciation*" OR ebitda OR e.b.i.t.d.a. OR "e.b.i.t.d.a." OR gaap OR g.a.a.p. OR "g.a.a.p." OR amoun* OR amt OR debt* OR credit* OR oblig* OR loan* OR facilit* OR ow* OR mortgag*) AND ("out of network" OR OON OR "out of area" OR OOA OR NonPar* OR Non-Par* OR "outside the network" OR "outside of the network" OR "beyond the network" OR "out of network" OR "out-of-network" OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR "non-par*" OR non-contract* OR noncontract* OR "non contract*" OR "out-of-network sol*" OR "out of network sol*" OR "end-to-end cost contain*" OR "un contract*" OR uncontract* OR "un-contract*" OR "zelis contract*")
60.	((compet* OR Aetna OR Cigna OR Elevance OR UnitedHealth OR United Health OR UHG OR payer* OR payor* OR "dental payer*" OR "dental payor*" OR insur* OR "insurance co*" OR TPA OR "t.p.a." OR "third-party administrat*" OR "third party administrat*" OR "self fund*" OR self-fund* OR zelis OR zelis.com OR meritain OR "meritain health, inc." OR "meritain health" OR "meritain health dispute resol*" OR "the cigna group" OR "cigna group" OR humana OR united* OR "united health" OR unitedhealthgroup OR "unitedhealth group" OR "united healthgroup" OR "united healthcare" OR unitedhealthcare OR "u.h.g." OR UHC OR "u.h.c." OR UHCG OR "u.h.c.g." OR "anthem blue cross of california" OR anthem OR "blue cross of california" OR "blue cross" OR BCCA OR "cigna health and life ins*" OR "healthscope benefits" OR healthscope OR "health scope" OR "healthscope benefits, inc." OR "UMR, inc." OR "UMR inc" OR UMR) AND (Zelis OR Zellis OR Zelious OR Zellious OR Zeliu OR Zellius OR Zealous OR zelis.com OR "zelis.com" OR @zelis OR "@zelis" OR @zelis.com OR "@zelis.com")) AND (terminat* OR fire OR fired OR firing OR disciplin* OR suspen* OR reprimand* OR violat* OR review* OR eval* OR assess* OR hir* OR promot* OR demot* OR resign* OR incentiv* OR rais*)
61.	((compet* OR Aetna OR Cigna OR Elevance OR UnitedHealth OR United Health OR payer* OR payor* OR "dental payer*" OR "dental payor*" OR insur* OR "insurance co*" OR TPA OR "t.p.a." OR "third-party administrat*" OR "third party administrat*" OR "self fund*" OR self-fund* OR zelis OR zelis.com OR meritain OR "meritain health, inc." OR "meritain health" OR "meritain health dispute resol*" OR "the cigna group" OR "cigna group" OR humana OR united* OR "united health" OR unitedhealthgroup OR "unitedhealth group" OR "united healthgroup" OR "united healthcare" OR unitedhealthcare OR UHG OR "u.h.g." OR UHC OR "u.h.c." OR UHCG OR "u.h.c.g." OR "anthem blue cross of california" OR anthem OR "blue cross of california" OR "blue cross" OR BCCA OR "cigna health and life ins*" OR "healthscope benefits" OR healthscope OR "health scope" OR "healthscope benefits, inc." OR "UMR, inc." OR "UMR inc" OR UMR) AND ("out of network" OR OON OR out of area OR OOA OR NonPar* OR Non-Par* OR "outside the network" OR "outside of the network" OR "beyond the network" OR "out of network" OR "out-of-network" OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR "non-par*" OR non-contract* OR noncontract* OR "non contract*" OR "out-of-network sol*" OR "out of network sol*" OR "end-to-end cost contain*" OR "un contract*" OR uncontract* OR "un-contract*" OR "zelis contract*")) AND (terminat* OR fire OR fired OR firing OR disciplin* OR suspen* OR reprimand* OR violat* OR review* OR eval* OR assess* OR hir* OR promot* OR demot* OR resign* OR incentiv* OR rais*)

EXHIBIT 5

Search No.	Plaintiffs' 8/26/26 Proposed Revisions and Additions to Elevance's 7/21/26 Proposed Search Terms
1.	((OON OR "out-of-network" OR "outside the network" OR "outside of the network" OR "beyond the network" OR OOA OR "out of area" OR nonpar* OR "non-par*" OR noncontract* OR "non-contract*" OR uncontract* OR "un-contract*" OR reprec* OR reimburs*) w/3 (pric* OR serv*) w/10 AND (polic* OR procedure* OR guideline* OR negotiat* OR review* OR train* OR eval* OR assess* OR analy*)
2.	("out-of-network" OR OON OR "outside the network" OR "outside of the network" OR "beyond the network" OR OOA OR "out of area" OR nonpar* OR "non-par*" OR noncontract* OR "non-contract*" OR uncontract* OR "un-contract*" OR reprec* OR reimburs*) w/10 AND ((pric* OR service*) w/3 (develop* OR modif* OR implement* OR acqui* OR contract* OR agree* OR claim* OR pric* OR pay* OR paid* OR cost* OR expen* OR amount* OR payment* OR shell* OR rat* OR level* OR purchas* OR buy* OR bought* OR reimburs* OR re-imburs* OR data* OR datum* OR info* OR transact*))
3.	((Zelis OR Zellis OR Zelious OR Zellious OR Zeliu OR Zellius OR Zealous OR zelis.com OR "zelis.com" OR @zelis OR "@zelis" OR @zelis.com OR "Established Reimbursement" OR ERS OR "Referenced Based Pricing" OR RBP OR "Open Access Pricing" OR OAP OR established reimbursement schedule OR established reimbursement solution OR reference based pric* OR "e.r.s." OR e-r-s OR "e-r-s" OR "est* reimburs* schedul*" OR "fee schedul*" OR "est* reimburs* service*" OR "est* reimburs* sol*" OR Reference* Based Pricing OR reference-bas* pric* OR reference bas* pric* OR referenced bas* pric* OR r.b.p. OR "r.b.p." OR r-b-p OR "r-b-p") w/5 AND ((OON OR "out-of-network" OR "outside the network" OR "outside of the network" OR "beyond the network" OR OOA OR "out of area" OR nonpar* OR "non-par*" OR noncontract* OR "non-contract*" OR uncontract* OR "un-contract*" OR reprec* OR reimburs*) w/3 (reprec* OR pric* OR serv*) w/10 AND (method* OR capabili* OR function* OR effectiveness OR "claimed benefit*" OR negotiat* OR "claim* info*" OR "data interfac*" OR setup* OR implement* OR update* OR improve*))
4.	(("Price Map" OR "Intel* ligent Pric* ing " OR ZIPP OR QuickReprice OR "payment harmonization index" OR "payment* harmon* ind*" OR phi OR p.h.i. OR "p.h.i." OR quickreprec* OR "quick reprec*" OR quick-reprec* OR "quick-reprec*" OR network360 OR "network 360" OR network-360 OR "network-360" OR "zelis pric* map*" OR "open access pric*" OR "intel* pric* platform*" OR zipp OR z.i.p.p. OR "z.i.p.p." OR "oon sol*" OR "out of network sol*" OR "out-of-network sol*" OR "o.o.n. sol*" OR "o-o-n sol*" OR "onet sol*" OR "o-net sol*" OR "o net sol*") w/5 AND ((OON OR "out-of-network" OR "outside the network" OR "outside of the network" OR "beyond the network" OR OOA OR "out of area" OR nonpar* OR "non-par*" OR noncontract* OR "non-contract*" OR uncontract* OR "un-contract*" OR reprec* OR reimburs*) w/3 (reprec* OR pric* OR serv*) w/10 (method* OR capabili* OR function* OR effectiveness OR "claimed benefit*" OR negotiat* OR "claim* info*" OR "data interfac*" OR setup* OR implement* OR update* OR improve*))
5.	("user group*" OR "user advisory group*" OR "focus group" OR "test group" OR "test" OR "survey" OR "poll") w/5 (Zelis OR "Established Reimbursement" OR ERS OR "Referenced Based Pricing" OR RBP OR "Open Access Pricing" OR OAP OR "Price Map" OR "Intelligent Pricing" OR ZIPP OR QuickReprice OR established reimbursement schedule OR established reimbursement solution OR reference based pric* OR "e.r.s." OR e-r-s OR "e-r-s" OR "est* reimburs* schedul*" OR "fee schedul*" OR "est* reimburs* service*" OR "est* reimburs* sol*" OR Reference* Based Pricing OR reference-bas* pric* OR reference bas* pric* OR referenced bas* pric* OR r.b.p. OR "r.b.p." OR r-b-p OR "r-b-p")

6.	((use* OR implement* OR price* OR target* OR benchmark* OR procedure* <u>OR provide* OR require*</u>) w/3AND (OON OR "out-of-network" OR "outside the network" OR "outside of the network" OR "beyond the network" OR OOA OR "out of area" OR nonpar* OR "non-par*" OR noncontract* OR "non-contract*" OR uncontract* OR "un-contract*" OR reprice* OR reimburse* OR "reprice* service*")) w/10AND (Zelis OR Zellis OR Zelious OR Zellious OR Zeliu* OR Zellius OR Zealous OR zelis.com OR "zelis.com" OR @zelis OR "@zelis" OR @zelis.com OR "Established Reimbursement" OR ERS OR "Referenced Based Pricing" OR RBP OR "Open Access Pricing" OR OAP OR "Price Map" OR "Intelligent Pricing" OR ZIPP OR QuickReprice <u>OR established reimbursement schedule OR established reimbursement solution OR reference based price* OR "e.r.s." OR e-r-s OR "e-r-s" OR "est* reimburs* schedule*" OR "fee schedule*" OR "est* reimburs* service*" OR "est* reimburs* sol*" OR Reference* Based Pricing OR reference-bas* price* OR reference bas* price* OR referenced bas* price* OR r.b.p. OR "r.b.p." OR r-b-p OR "r-b-p" OR z.i.p.p. OR "z.i.p.p." OR "oon sol*" OR "out of network sol*" OR "out-of-network sol*" OR "o.o.n. sol*" OR "o-o-n sol*" OR "onet sol*" OR "o-net sol*" OR "o net sol*"))</u>
7.	((Zelis OR Zellis OR Zelious OR Zellious OR Zeliu* OR Zellius OR Zealous OR zelis.com OR "zelis.com" OR @zelis OR "@zelis" OR @zelis.com OR "Established Reimbursement" OR ERS OR "Referenced Based Pricing" OR RBP OR "Open Access Pricing" OR OAP OR "Price Map" OR "Intelligent Pricing" OR ZIPP OR QuickReprice <u>OR established reimbursement schedule OR established reimbursement solution OR reference based price* OR "e.r.s." OR e-r-s OR "e-r-s" OR "est* reimburs* schedule*" OR "fee schedule*" OR "est* reimburs* service*" OR "est* reimburs* sol*" OR Reference* Based Pricing OR reference-bas* price* OR reference bas* price* OR referenced bas* price* OR r.b.p. OR "r.b.p." OR r-b-p OR "r-b-p" OR z.i.p.p. OR "z.i.p.p." OR "oon sol*" OR "out of network sol*" OR "out-of-network sol*" OR "o.o.n. sol*" OR "o-o-n sol*" OR "onet sol*" OR "o-net sol*" OR "o net sol*")) w/10AND (price* OR strategy OR "OON Reprice*" OR caps OR benchmark* OR percent* OR negotiat* OR paramet* OR preference <u>OR "pricing strateg*" OR "pricing change*" OR claim* OR "payment level*" OR "rate level*" OR (allowed w/10 amount*) OR (paid w/25 amount*) OR reimbursement* OR "claims pricing" OR (pricing w/10 OON) OR "out-of-network pricing" OR "payment strateg*" OR percentile*)</u> ***Applied to a population of hits on Defendant names in headers (minus Elevance)</u>
8.	((OON OR "out-of-network" OR "outside the network" OR "outside of the network" OR "beyond the network" OR OOA OR "out of area" OR nonpar* OR "non-par*" OR noncontract* OR "non-contract*" OR uncontract* OR "un-contract*" OR reprice* OR reimburse*) w/3 (reprice* OR price* OR service*) w/5AND (offer* OR determination* OR "acceptance rate*" OR "rejection rate*" OR appeal* OR "advocacy letter*" OR "case agreement*" OR complaint* OR renegotiat* OR re-negotiat* OR "re-negotiat*" OR "re negotiat*" OR parameter* OR "appeal* parameter*" OR "appellat* parameter*" OR discuss* OR adjust* OR reten* OR "reten* rate*" OR "initial payment offer*" OR "original payment offer*" OR "inquiry rate*" OR "claims negotiat*" OR reprocess* OR re-process* OR "re-process*" OR "re process*" OR "best and final" OR "final and best" OR "negotiat* discount*" OR post-reprice* OR "post-reprice*" OR "post reprice*")) and ("Pacific Inpatient" or (Frank* w/2 Scaccia*) or "James Allen") OR "Allen Dental" OR ((Dennis* w/2 Ayer*))
9.	((Zelis OR Zellis OR Zelious OR Zellious OR Zeliu* OR Zellius OR Zealous OR zelis.com OR "zelis.com" OR @zelis OR "@zelis" OR @zelis.com OR "Established Reimbursement" OR ERS OR "Referenced Based Pricing" OR RBP OR "Open Access Pricing" OR OAP OR "Price Map" OR "Intelligent Pricing" OR ZIPP OR QuickReprice <u>OR established reimbursement schedule OR established reimbursement solution OR reference based price* OR "e.r.s." OR e-r-s OR "e-r-s"</u>

	OR "est* reimburs* schedul*" OR "fee schedul*" OR "est* reimburs* service*" OR "est* reimburs* sol*" OR Reference* Based Pricing OR reference-bas* pric* OR reference bas* pric* OR referenced bas* pric* OR r.b.p. OR "r.b.p." OR r-b-p OR "r-b-p") w/5 (terminat* OR repic*) AND ("Pacific Inpatient" OR or pacific inpatient medical group OR pimg OR p.i.m.g. OR pacific OR (pacific AND inpatient) OR (Frank* AND w/2 Scaccia*) OR Scaccia or "James Allen") OR "Allen Dental" OR ((Dennis* AND w/2 Ayer*) OR Ayer OR Ayer DDS))
10.	("Balance *Bill*" OR "gap bill*" OR "deficien* claim*" OR "claim deficien*" OR "bill* the bal*" OR "navigat*" OR "bill* differen*" OR surpris* OR "surpris* act*") w/5 AND (OON OR "Out-of-Network" OR "outside the network" OR "outside of the network" OR "beyond the network" OR OOA OR "out of area" OR nonpar* OR "non-par*" OR noncontract* OR "non-contract*" OR uncontract* OR "un-contract*" OR repic* OR reimburs*)
11.	(treatment* OR treat* OR "access to care" OR satisf* OR provide* OR service*) w/10 AND ((refus* OR deny* OR denied OR exclu* OR "not accept" OR unaccept* OR "un-accept*" OR "not see" OR "not treat" OR declin* OR cancel* OR "turn* away") w/5 ((patient*) w/3 AND ("out-of-network" OR OON OR "outside the network" OR "outside of the network" OR "beyond the network" OR OOA OR "out of area" OR nonpar* OR "non-par*" OR noncontract* OR "non-contract*" OR uncontract* OR "un-contract*" OR repic* OR reimburs*)))
12.	((OON OR "out-of-network" OR "outside the network" OR "outside of the network" OR "beyond the network" OR OOA OR "out of area" OR nonpar* OR "non-par*" OR noncontract* OR "non-contract*" OR uncontract* OR "un-contract*" OR repic* OR reimburs*) w/3 (competit* OR payor*) AND w/3 (repic* OR pric* OR servic*) w/10 (change* OR "in-network" OR "Healthcare Goods" OR provider* OR network OR "provider network*" OR "health maintenance org*" OR "health maintenance network*" OR hmo* OR "h.m.o." OR "health management org*" OR "health mgmt. org*" OR "health mgmt org*" OR "ppo network*" OR "p.p.o. network*" OR ppo OR "preferred provider organization*"))
13.	((("out-of-network" OR OON OR "outside the network" OR "outside of the network" OR "beyond the network" OR OOA OR "out of area" OR nonpar* OR "non-par*" OR noncontract* OR "non-contract*" OR uncontract* OR "un-contract*" OR repic* OR reimburs*) AND w/3 (competit* OR compete* OR)) w/10 (supply OR demand OR "market share*" OR "market presence" OR "market size" OR "market analysis" OR "market payer" OR "competitive position" OR "geographic scope" OR "geographic reach" OR compet* OR "geograph* adjust*" OR "geograph* area*" OR barrier* OR entr* OR grow* OR expan* OR "absence of compet*" OR "lack of compet*" OR "lessened compet*" OR "enrollment share*" OR "covered lives" OR "barrier* to entry" OR "third-party administrator*" OR Tricare OR Medicare OR Medicaid)
14.	(Zelis OR Zellis OR Zelious OR Zelliious OR Zeliis OR Zellius OR Zealous OR zelis.com OR "zelis.com" OR @zelis OR "@zelis" OR @zelis.com OR "Established Reimbursement" OR ERS OR "Referenced Based Pricing" OR RBP OR "Open Access Pricing" OR OAP OR "Price Map" OR "Intelligent Pricing" OR ZIPP OR QuickReprice OR established reimbursement schedule OR established reimbursement solution OR reference based pric* OR "e.r.s." OR e-r-s OR "e-r-s" OR "est* reimburs* schedul*" OR "fee schedul*" OR "est* reimburs* service*" OR "est* reimburs* sol*" OR Reference* Based Pricing OR reference-bas* pric* OR reference bas* pric* OR referenced bas* pric* OR r.b.p. OR "r.b.p." OR r-b-p OR "r-b-p") w/10 AND ((OON OR "out-of-network" OR "outside the network" OR "outside of the network" OR "beyond the network" OR OOA OR "out of area" OR nonpar* OR "non-par*" OR noncontract* OR "non-contract*" OR uncontract* OR "un-contract*" OR repic* OR reimburs*) w/3 AND ((repic* OR pric* OR servic* OR) AND (charge* OR spend* OR bill* OR invoic* OR cost* OR fee*)) OR (compar* OR model* OR analys* OR resembl* OR contrast OR) w/10 ((OON OR "Out-of-Network") w/3 (pric* OR servic* OR "billed charge*" OR "allowed amount*"))

15.	(Zelis OR Zellis OR Zelious OR Zellious OR Zelius OR Zellius OR Zealous OR zelis.com OR "zelis.com" OR @zelis OR "@zelis" OR @zelis.com OR "Established Reimbursement" OR ERS OR "Referenced Based Pricing" OR RBP OR "Open Access Pricing" OR OAP OR "Price Map" OR "Intelligent Pricing" OR ZIPP OR QuickReprice OR established reimbursement schedule OR established reimbursement solution OR reference based pric* OR "e.r.s." OR e-r-s OR "e-r-s" OR "est* reimburs* schedul*" OR "fee schedul*" OR "est* reimburs* service*" OR "est* reimburs* sol*" OR Reference* Based Pricing OR reference-bas* pric* OR reference bas* pric* OR referenced bas* pric* OR r.b.p. OR "r.b.p." OR r-b-p OR "r-b-p") w/10 AND ((OON OR "out-of-network" OR "outside the network" OR "outside of the network" OR "beyond the network" OR OOA OR "out of area" OR nonpar* OR "non-par*" OR noncontract* OR "non-contract*" OR uncontract* OR "un-contract*" OR reimburs*) OR w/3 (reprice* OR pric* OR servic*))
16.	(policy OR w/10 ((set* OR establish* OR defin* OR limit* OR fix* OR default* OR de-fault* OR "de fault*" OR initial* OR original* OR list* OR "no more than" OR "no less than" OR "more than" OR "less than" OR "higher rat*" OR "lower rat*" OR "original* pa* amount*" OR "initial* pa* amount*" OR mac OR "m.a.c." OR "max* allow* charg*" OR "max* allow* cost*" OR "max* allow* reimburs*" OR "allow* amount*" OR "amount* allow*" OR "reimburs* level*" OR "level of reimburs*" OR percent* OR pct* OR % OR amount* OR ceiling* OR cap* OR caps OR floor* OR threshold* OR threshhold* OR thresh-hold* OR "thresh-hold*" OR "thresh hold*" OR cliff* OR crater* allow* charg*" OR "max* allow* cost*" OR "max* allow* reimburs*" OR "allow* amount*" OR "amount* allow*" OR "reimburs* level*" OR "level of reimburs*") w/5 AND ((OON OR "out-of-network" OR "outside the network" OR "outside of the network" OR "beyond the network" OR OOA OR "out of area" OR nonpar* OR "non-par*" OR noncontract* OR "non-contract*" OR uncontract* OR "un-contract*" OR reprice* OR reimburs*) w/3 (reprice* OR pric* OR servic*)))
17.	("payment* harmon* ind*" OR phi OR p.h.i. OR "p.h.i." OR quickreprice* OR "quick reprice*" OR quick-reprice* OR "quick-reprice*" OR network360 OR "network 360" OR network-360 OR "network-360" OR "zelis pric* map*" OR "open access pric*" OR "intel* pric* platform*" OR zipp OR z.i.p.p. OR "z.i.p.p." OR "oon sol*" OR "out of network sol*" OR "out-of-network sol*" OR "o.o.n. sol*" OR "o-o-n sol*" OR "onet sol*" OR "o-net sol*" OR "o net sol*")
18.	(Zelis OR Zellis OR Zelious OR Zellious OR Zelius OR Zellius OR Zealous OR zelis.com OR "zelis.com" OR @zelis OR "@zelis" OR @zelis.com OR "Established Reimbursement" OR ERS OR "Referenced Based Pricing" OR RBP OR "Open Access Pricing" OR OAP OR established reimbursement schedule OR established reimbursement solution OR reference based pric* OR "e.r.s." OR e-r-s OR "e-r-s" OR "est* reimburs* schedul*" OR "fee schedul*" OR "est* reimburs* service*" OR "est* reimburs* sol*" OR Reference* Based Pricing OR reference-bas* pric* OR reference bas* pric* OR referenced bas* pric* OR r.b.p. OR "r.b.p." OR r-b-p OR "r-b-p") AND (method* OR capabili* OR function* OR effectiveness OR "claimed benefit*" OR negotiat* OR "claim* info*" OR "data interfac*" OR setup* OR implement* OR update* OR improve*)
19.	((pacific AND inpatient) OR pacific inpatient medical group OR pimg OR p.i.m.g. OR pacific)
20.	((Frank AND Scaccia) OR scaccia)
21.	((Dennis AND Ayer) OR Ayer DDS OR ayer)
22.	("ethan ciment" OR "ciment" OR "chelsea foot and ankle p.c." OR chelsea OR "chelsea foot")
23.	(Bachoua AND (Dan* OR chiro*)) OR ((dbc OR d.b.c. AND chiro*) OR bachoua OR dbc OR d.b.c.)

24.	<u>("4 missing peace" OR "4 missing peace corps, Inc." OR "the missing peace center" OR "missing peace" OR "rhodes-levin" OR "chris laurence" OR Laurence)</u>
25.	<u>("transparency in coverage" OR "TIC Rule" OR "T.I.C. Rule*" OR tic OR t.i.c. OR "t.i.c." OR t-i-c OR "t-i-c" OR "transparency in coverage rule*" OR "tic rule*" OR "t-i-c rule*" OR "machine-readable file*" OR mrf OR m.r.f. OR "m.r.f." OR m-r-f OR "m-r-f" OR compl* OR "tic mrf files" OR "t.i.c. m.r.f." OR "mrf creat*" OR "m.r.f. creat*") AND ("OON" OR "out-of-network" OR "out of network" OR reprec* OR "outside the network" OR "outside of the network" OR "beyond the network" OR OOA OR "out of area" OR nonpar* OR "non-par*" OR noncontract* OR "non-contract*" OR uncontract* OR "un-contract*" OR reimburs*)</u>
26.	<u>(conspir* OR co-conspir* OR cartel* OR collu* OR coordinat* OR agree* OR align* OR antitrust* OR "anti-trust*" OR anticompet* OR "anti-compet*" OR "information shar*" OR "data shar*") AND (payer* OR payor* OR Aetna OR Cigna OR Elevance OR UnitedHealthcare OR UHG OR UHC OR UMR OR HealthScope OR Anthem OR Zelis OR repricer* OR client* OR customer* OR Humana OR UnitedHealth OR united healthcare OR u.h.g. OR u.h.c. OR uhcg OR u.h.c.g. OR "dental payer*" OR "dental payor*" OR insur* OR insurer* OR "insurance co*" OR TPA OR "t.p.a." OR "third-party administrat*" OR "third party administrat*" OR "self fund*" OR self-fund* OR meritain OR "meritain health, inc." OR "meritain health" OR "meritain health dispute resol*" OR "the cigna group" OR "cigna group" OR "anthem blue cross of california" OR "blue cross of california" OR "blue cross" OR BCCA OR "cigna health and life ins*" OR "healthscope benefits" OR "health scope" OR "healthscope benefits, inc." OR "UMR, inc." OR "UMR inc")</u>
27.	<u>(role* OR responsib* OR assign* OR delegat* OR supplant* OR authori* OR capacit* OR own* OR operat* OR manag* OR supervis* OR control* OR relinquish* OR entrust* OR ced* OR agent*) AND (OON OR "out-of-network" OR "out of network" OR reprec* OR "outside the network" OR "outside of the network" OR "beyond the network" OR OOA OR "out of area" OR nonpar* OR "non-par*" OR noncontract* OR "non-contract*" OR uncontract* OR "un-contract*" OR reimburs* OR "claims pricing" OR payer* OR payor* OR insurer* OR Zelis)</u>
28.	<u>(freedom* OR flex* OR choic* OR choos* OR "pa* more" OR compens* OR "pay more" OR "paid more" OR "pays more" OR "paying more" OR "increas* payment*" OR "increas* benefi*" OR "greater benefi*" OR "pa* less" OR "decreas* pa*" OR "decreas* benefi*" OR "smaller benefi*" OR "less cover*" OR "more cover*" OR "smaller rat*" OR "greater rat*" OR "decreas* rat*")</u>
29.	<u>("market rat*" OR market-rat* OR "full rat*" OR "compet* rat*" OR invoic* OR "full invoic*" OR "as invoic*" OR "as-invoic*" OR "market pric*" OR "full pric*" OR market*)</u>
30.	<u>(antitrust OR anti-trust OR "trade regulation*" OR regulat* OR handbook* OR hand-book* OR "hand book*" OR manual* OR "antitrust train*" OR "anti-trust train*" OR "antitrust guid*" OR "anti-trust guid*" OR "antitrust publi*" OR "anti-trust publi*" OR "antitrust email*" OR "anti-trust email*" OR "anti-trust e-mail*" OR "anti-trust e-mail*" OR "antitrust protocol*" OR "anti-trust protocol*" OR "authorit* on antitrust" OR "authorit* on anti-trust" OR "antitrust author*" OR "anti-trust author*" OR "antitrust report*" OR "anti-trust report*" OR "sherman act" OR "section one" OR "section 1" OR "sec. one" OR "sec. 1" OR "\$ one" OR "\$ 1" OR "15 u.s.c. section one" OR "15 u.s.c. section 1" OR "15 u.s.c. sec. one" OR "15 u.s.c. sec. 1" OR "15 u.s.c. \$ one" OR "15 u.s.c. \$ 1" OR "clayton act" OR "section sixteen" OR "section 16" OR "sec. sixteen" OR "sec. 16" OR "\$ 16" OR "15 u.s.c. section twenty-six" OR "15 u.s.c. section twenty six" OR "15 u.s.c. section 26" OR "15 u.s.c. sec. twenty-six" OR "15 u.s.c. sec. twenty six" OR "15 u.s.c. sec. 26" OR "15 u.s.c. \$ twenty-six" OR "15 u.s.c. \$ twenty six" OR "15 u.s.c. \$ 26" OR "\$ 26")</u>

31.	(<u>violat*</u> OR <u>antitrust*</u> OR <u>anti-trust</u> OR <u>conspir*</u> OR <u>coconspir*</u> OR <u>co-conspir*</u> OR <u>co conspir*</u> OR <u>collud*</u> OR <u>cartel*</u> OR <u>fix*</u> OR <u>coordinat*</u> OR <u>anti-compet*</u> OR <u>anticompet*</u> OR <u>compet*</u> OR <u>"trade regulation"</u> OR <u>regulat*</u> OR <u>handbook*</u> OR <u>hand-book*</u> OR <u>"hand book"</u> OR <u>manual*</u> OR <u>"antitrust train"</u> OR <u>"anti-trust train"</u> OR <u>"antitrust guid"</u> OR <u>"anti-trust guid"</u> OR <u>"sherman act"</u> OR <u>"section 1"</u> OR <u>"sec. 1"</u> OR <u>"15 u.s.c. § 1"</u> OR <u>"clayton act"</u> OR <u>"section 16"</u> OR <u>"sec. 16"</u> OR <u>"15 u.s.c. § 26"</u>) AND (<u>Zelis*</u> OR <u>zelis.com</u> OR <u>ERS</u> OR <u>established reimbursement schedule</u> OR <u>established reimbursement solution</u> OR <u>reference based pric*</u> OR <u>"e.r.s."</u> OR <u>e-r-s</u> OR <u>"e-r-s"</u> OR <u>"est* reimburs* schedul"</u> OR <u>"fee schedul"</u> OR <u>"est* reimburs* service"</u> OR <u>"est* reimburs* sol"</u> OR <u>Reference* Based Pricing</u> OR <u>RBP</u> OR <u>reference-bas* pric*</u> OR <u>reference bas* pric*</u> OR <u>referenced bas* pric*</u> OR <u>r.b.p.</u> OR <u>"r.b.p."</u> OR <u>r-b-p</u> OR <u>"r-b-p"</u>)
32.	(<u>"Zelis Forum"</u> OR <u>zelis conference</u> OR <u>zelis retreat</u> OR <u>"client* confer"</u> OR <u>"customer* confer"</u> OR <u>fora*</u> OR <u>"lost pines resort"</u> OR <u>"lost pines resort and spa"</u> OR <u>"lost pines resort & spa"</u> OR <u>"hyatt regency lost pines resort and spa"</u> OR <u>"hyatt regency lost pines resort & spa"</u> OR <u>hyatt</u> OR <u>regency</u> OR <u>resort*</u> OR <u>"lost pines"</u> OR <u>"boca raton"</u> OR <u>retreat*</u> OR <u>conference*</u> OR <u>"annual confer"</u> OR <u>"payer* confer"</u> OR <u>"payor* confer"</u> OR <u>"corporate event"</u> OR <u>"indus* event"</u> OR <u>"payer* event"</u> OR <u>"payor* event"</u> OR <u>"executiv* event"</u>) AND (<u>payer*</u> OR <u>payor*</u> OR <u>insurer*</u> OR <u>Aetna</u> OR <u>Cigna</u> OR <u>Elevance</u> OR <u>Humana</u> OR <u>UnitedHealth</u> OR <u>UnitedHealthcare</u> OR <u>UHC</u> OR <u>UMR</u> OR <u>united healthcare</u> OR <u>u.h.g.</u> OR <u>u.h.c.</u> OR <u>uhcg</u> OR <u>u.h.c.g.</u> OR <u>"dental payer"</u> OR <u>"dental payor"</u> OR <u>insur*</u> OR <u>insurer*</u> OR <u>"insurance co"</u> OR <u>TPA</u> OR <u>"t.p.a."</u> OR <u>"third-party administrat"</u> OR <u>"third party administrat"</u> OR <u>"self fund"</u> OR <u>self-fund*</u> OR <u>meritain</u> OR <u>"meritain health, inc."</u> OR <u>"meritain health"</u> OR <u>"meritain health dispute resol"</u> OR <u>cigna</u> OR <u>"the cigna group"</u> OR <u>"cigna group"</u> OR <u>"anthem blue cross of california"</u> OR <u>anthem</u> OR <u>"blue cross of california"</u> OR <u>"blue cross"</u> OR <u>BCCA</u> OR <u>"cigna health and life ins"</u> OR <u>"healthscope benefits"</u> OR <u>healthscope</u> OR <u>"health scope"</u> OR <u>"healthscope benefits, inc."</u> OR <u>"UMR, inc."</u> OR <u>"UMR inc"</u> OR <u>repricer*</u> OR <u>Availity</u> OR <u>availability</u> OR <u>avail*</u> OR <u>AHIP</u> OR <u>America* Health Insurance Plan*</u> OR <u>a.h.i.p.</u> OR <u>"a.h.i.p."</u> OR <u>"america's health insurance plan"</u> OR <u>"american health insurance plan"</u> OR <u>"america* health ins* plan"</u>)
33.	(<u>"national advantage program"</u> OR <u>"nat'l advantage program"</u> OR <u>"natl* advantage program"</u> OR <u>nap</u> OR <u>n.a.p.</u> OR <u>"n.a.p."</u> OR <u>"national advantage"</u> OR <u>"nat'l advantage"</u> OR <u>"natl* advantage"</u> OR <u>"nationwide advantage"</u> OR <u>"administrative service agree"</u> OR <u>asas</u> OR <u>a.s.a.s.</u> OR <u>"a.s.a.s."</u> OR <u>asa</u> OR <u>a.s.a.</u> OR <u>"a.s.a."</u> OR <u>"claim* pass"</u> OR <u>claimpass</u> OR <u>claim-pass*</u> OR <u>"claim-pass"</u> OR <u>cps</u> OR <u>c.p.s.</u> OR <u>"c.p.s."</u> OR <u>csps</u> OR <u>c.s.p.s.</u> OR <u>"c.s.p.s."</u> OR <u>"supp* network* serv"</u> OR <u>"accelerat* pa"</u> OR <u>"ap program"</u> OR <u>"a.p. program"</u> OR <u>"ap network"</u> OR <u>"a.p. network"</u> OR <u>"medical reimbursement analysis service"</u> OR <u>"professional negotiat* serv"</u> OR <u>"prof'l negotiat* serv"</u> OR <u>pns</u> OR <u>p.n.s.</u> OR <u>"p.n.s."</u> OR <u>ppns</u> OR <u>p.p.n.s.</u> OR <u>"p.p.n.s."</u> OR <u>"continuous discount* agreement"</u> OR <u>cda</u> OR <u>c.d.a.</u> OR <u>"c.d.a."</u>)
34.	(<u>profit*</u> OR <u>earning*</u> OR <u>"net earning"</u> OR <u>incom*</u> OR <u>"net incom"</u> OR <u>revenu*</u> OR <u>net revenu*</u> OR <u>money*</u> OR <u>monet*</u> OR <u>currenc*</u> OR <u>dollar*</u> OR <u>usd</u> OR <u>u.s.d.</u> OR <u>"u.s.d."</u> OR <u>"financial health"</u> OR <u>"in the red"</u> OR <u>"in the black"</u> OR <u>"in the money"</u> OR <u>cash*</u> OR <u>"cash equivalent"</u> OR <u>holding*</u> OR <u>invest*</u> OR <u>"short term"</u> OR <u>short-term</u> OR <u>"long term"</u> OR <u>long-term</u> OR <u>saving*</u> OR <u>sav*</u> OR <u>"earnings before income tax, depreciation"</u> OR <u>ebitda</u> OR <u>e.b.i.t.d.a.</u> OR <u>"e.b.i.t.d.a."</u> OR <u>gaap</u> OR <u>g.a.a.p.</u> OR <u>"g.a.a.p."</u> OR <u>amoun*</u> OR <u>amt</u> OR <u>debt*</u> OR <u>credit*</u> OR <u>oblig*</u> OR <u>loan*</u> OR <u>facilit*</u> OR <u>ow*</u> OR <u>mortgag*</u>) AND (<u>"out of network"</u> OR <u>OON</u> OR <u>"out of area"</u> OR <u>OOA</u> OR <u>NonPar*</u> OR <u>Non-Par*</u> OR <u>"outside the network"</u> OR <u>"outside of the network"</u> OR <u>"beyond the network"</u> OR <u>"out of network"</u> OR <u>"out-of-network"</u>)

	<u>OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR "non-par*" OR non-contract* OR noncontract* OR "non contract*" OR "out-of-network sol*" OR "out of network sol*" OR "end-to-end cost contain*" OR "un contract*" OR uncontract* OR "un-contract*" OR "zelis contract*")</u>
35.	<u>(pric* OR cost* OR expen* OR amount* OR level* OR reproc* OR re-pric* OR "re pric*" OR paid* OR pay* OR payment* OR satisf* OR settl* OR assur* OR discontinu* OR "executive law*" OR ceas* OR desist* OR "exclusiv* us*" OR exclusive-us* OR exclusiv* OR "five year*" OR five-year* OR "five-year*" OR "five yr*" OR five-yr* OR "five-yr*" OR "5 year*" OR 5-year* OR "5-year*" OR "5 yr*" OR 5-yr* OR "5-yr*" OR increas* OR revers* OR climb* OR "26%" OR "13%")</u>
36.	<u>("claim* pass*" OR claimpass OR claim-pass* OR "claim-pass*" OR cps OR c.p.s. OR "c.p.s." OR csps OR c.s.p.s. OR "c.s.p.s." OR "supp* network* serv*" OR "accelerat* pa*" OR "ap program*" OR "a.p. program*" OR "ap network*" OR "a.p. network*" OR "medical reimbursement analysis service*" OR "professional negotiat* serv*" OR "prof'l negotiat* serv*" OR pns OR p.n.s. OR "p.n.s." OR ppns OR p.p.n.s. OR "p.p.n.s." OR "continuous discount* agreement*" OR cda OR c.d.a. OR "c.d.a.")</u>
37.	<u>("independent database*" OR "not-for-profit compan*" OR "not for profit compan*" OR "non-profit compan*" OR "non profit compan*" OR "fair health" OR "five year*" OR five-year* OR "five yr*" OR five-yr* OR "5 year*" OR 5-year* OR "5 yr*" OR 5-yr* OR "exclus* period*" OR "exclus* term*" OR "exclus* us*" OR "fair market*" OR "reasonable and customary" OR "r and c" OR "r & c" OR "usual, customary and reasonable" OR "usual, customary, and reasonable" OR ucr OR u.c.r. OR "usual, customary & reasonable" OR "customary & reasonable" OR "customary and reasonable" OR "usual and customary" OR "usual & reasonable" OR "usual & customary" OR "market rat*")</u>
38.	<u>(500 OR "five hundred" OR five-hundred OR "five-hundred" OR 750 OR "seven hundred fifty" OR seven-hundred-fifty OR "seven-hundred-fifty" OR 770 OR "seven hundred seventy" OR seven-hundred-seventy OR "seven-hundred-seventy" OR "top 5" OR top-5 OR "top-5" OR "top five" OR top-five OR "top-five")</u>
39.	<u>(Bain OR "Bain Capital" OR Parthenon OR "Parthenon Capital" OR Mubadala OR "Mubadala Investment Company" OR HarbourVest OR HarborVest OR Guidehouse OR "Office Ally" OR "private equity" OR invest* OR loan* OR credit*) AND (Zelis OR Zellis OR Zelious OR Zellious OR Zeliu OR Zellius OR Zealous OR zelis.com OR "zelis.com" OR control* OR leverag* OR steer* OR oblig* OR dictat* OR restrict*) AND (out of network OR OON OR out of area OR OOA OR NonPar* OR Non-Par* OR "out of network" OR "outside the network" OR "outside of the network" OR "beyond the network" OR "out of network" OR "out-of-network" OR OON OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR "non-par*" OR non-contract* OR noncontract* OR "non contract*" OR "out-of-network sol*" OR "out of network sol*" OR "end-to-end cost contain*" OR "un contract*" OR uncontract* OR "un-contract*" OR "zelis contract*")</u>
40.	<u>(director* OR consult* OR advisor* OR adviser* OR "board member*" OR member* OR board* OR "board meet*" OR "advisor* board" OR "adviser* board" OR itenerar* OR "advisor* committee*" OR "adviser* committee*" OR "committee advis*" OR "board advisor*" OR "director* advisor*" OR "director* adviser*" OR "meet* notes" OR minute* OR veto* OR vote* OR "board consult*" OR "consult* to the board*" OR "strategic advi*") AND (Zelis OR Zellis OR Zelious OR Zellious OR Zeliu OR Zellius OR Zealous OR zelis.com OR "zelis.com")</u>

41.	<u>((Ingenix OR "Fair Health" OR fairhealth OR UCR OR "usual and customary" OR "usual, customary and reasonable" OR "reasonable and customary" OR "market rat*") AND (OON OR "out-of-network" OR reprec* OR reimburs* OR pric* OR rate* OR benchmark* OR databas*))</u>
42.	<u>("zelis forum" OR forum OR Zelis OR Zellis OR Zelious OR Zellious OR Zeliu OR Zellius OR Zealous OR zelis.com OR @zelis OR "@zelis" OR @zelis.com OR "@zelis.com") AND ("hyatt regency lost pines resort and spa" OR boca raton OR conference* OR fora* OR "lost pines resort" OR "lost pines resort and spa" OR "lost pines resort & spa" OR "hyatt regency lost pines resort & spa" OR hyatt OR regency OR "boca raton" OR retreat* OR "annual confer*" OR "client* Confer*" OR "customer* Confer*" OR "payer* confer" OR "payor* Confer*" OR "corporate event*" OR "indus* Event*" OR "payer* Event*" OR "payor* Event*" OR "executiv* Event*")</u>
43.	<u>(Zelis OR zelis* OR zelis.com OR Zellis OR Zelious OR Zellious OR Zeliu OR Zellius OR Zealous OR zelis.com OR @zelis OR "@zelis" OR @zelis.com) AND (client conference* OR attend* OR attend* list* OR confirm* OR invit* OR invit* list* OR committee* OR travel* OR hotel receipt* OR restaurant receipt* OR bar* OR bar receipt* OR photo OR picture* OR reserve* OR yoga OR golf* OR ski* OR fish* OR swim* OR happy hour* OR happy-hour* OR cocktai* OR cock-tail* OR cock tail* OR excursion OR music* OR (magic w/10 johnson) OR comed* OR OR post* OR (Jason w/10 sudeikis) OR sudeikis OR conference* OR note* OR client* OR customer* OR payer* OR payor* OR transcri* OR audio* OR record* OR "audio record*" OR "video record*" OR video OR "visual record*" OR activit* OR resort* OR hotel* OR restaurant* OR receipt*)</u>
44.	<u>(zelis OR Zellis OR Zelious OR Zellious OR Zeliu OR Zellius OR Zealous OR zelis.com OR @zelis OR "@zelis" OR @zelis.com OR "@zelis.com") AND (rebrand* OR re-brand* OR "new* brand*" OR nam* OR renam* OR re-nam* OR "re-nam*" OR "re nam*" OR "new* nam*" OR June 13, 2016 OR 06/13/2016 OR 06/13/16 OR 6/13/2016 OR 6/13/16 OR 2016 June 13 OR 06-13-2016 OR 06-13-16 OR 6-13-2016 OR 6-13-16 OR 06.13.2016 OR 6.13.2016 OR 06.13.16)</u>
45.	<u>(hate* OR dislik* OR frown* OR discourag* OR "do not like" OR don't like OR "do not want*" OR don't want* OR fair OR "not fair" OR unfair OR cancel* OR switch* OR "switch off" OR "switch away" OR "switch from" OR "transition away" OR "transition from" OR "end* use" OR "end* our use" OR "mov* away" OR nonrenew* OR non-renew* OR "not renew*" OR "provider react*" OR unsubscri* OR "un subscri*" OR "stop* subscri*") AND (Zelis* OR zelis.com OR Zellis OR Zelious OR Zellious OR Zeliu OR Zellius OR Zealous OR zelis.com OR @zelis OR "@zelis" OR @zelis.com OR ERS OR established reimbursement schedule OR established reimbursement solution OR reference bas* pric* OR "e.r.s." OR e-r-s OR "e-r-s" OR "est* reimburs* schedul*" OR reprec* OR "fee schedul*" OR "est* reimburs* service*" OR "est* reimburs* sol*" OR Reference* Based Pricing OR RBP OR reference-bas* pric* OR referenced-bas* pric* OR referenced bas* pric* OR r.b.p. OR "r.b.p." OR r-b-p OR "r-b-p")</u>
46.	<u>(exclu* OR "not accept" OR unaccept* OR "un-accept*" OR "not see" OR "not treat" OR refus* OR declin* OR cancel* OR "turn* away") AND ("out of network" OR OON OR "out of area" OR OOA OR NonPar* OR Non-Par* OR "outside the network" OR "outside of the network" OR "beyond the network" OR "out of network" OR "out-of-network" OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR "non-par*" OR non-contract* OR noncontract* OR "non contract*" OR "out-of-network sol*" OR "out of network sol*" OR "end-to-end cost contain*" OR "un contract*" OR uncontract* OR "un-contract*" OR "zelis contract*")</u>
47.	<u>(tool* OR method* OR tech* OR databas* OR data-bas* OR "data-bas*" OR "data bas*" OR dbas* OR d-bas* OR "d-bas*" OR schedul* OR "survey data" OR "raw data" OR "underlying</u>

	<u>data" OR "source data" OR "est* reimburs* schedul*" OR "fee schedul*" OR "est* reimburs* service*" OR "est* reimburs* sol*" OR ers OR "e.r.s." OR e-r-s OR "e-r-s" OR "reference-bas* pric*" OR "reference bas* pric*" OR "referenced-bas* pric*" OR "referenced bas* pric*" OR rbp OR r.b.p. OR "r.b.p." OR r-b-p OR "r-b-p" OR "auto* rout*" OR "a.i." OR "ai" OR "artificial intelligen*" OR "gen* a.i." OR "gen* ai" OR "gen-ai" OR "gen-a.i." OR "machin* learn*" OR algorithm*)</u>
48.	<u>(compet* OR Aetna OR Cigna OR Elevance OR UnitedHealth OR United Health OR UHG OR payer* OR payor* OR "dental payer*" OR "dental payor*" OR insur* OR "insurance co*" OR TPA OR "t.p.a." OR "third-party administrat*" OR "third party administrat*" OR "self fund*" OR self-fund* OR zelis OR zelis.com OR meritain OR "meritain health, inc." OR "meritain health" OR "meritain health dispute resol*" OR "the cigna group" OR "cigna group" OR humana OR united* OR "united health" OR unitedhealthgroup OR "unitedhealth group" OR "united healthgroup" OR "united healthcare" OR unitedhealthcare OR "u.h.g." OR UHC OR "u.h.c." OR UHCG OR "u.h.c.g." OR "anthem blue cross of california" OR anthem OR "blue cross of california" OR "blue cross" OR BCCA OR "cigna health and life ins*" OR "healthscope benefits" OR healthscope OR "health scope" OR "healthscope benefits, inc." OR "UMR, inc." OR "UMR inc" OR UMR) AND (Zelis OR Zellis OR Zelious OR Zellious OR Zeliu OR Zellius OR Zealous OR zelis.com OR "zelis.com" OR @zelis OR "@zelis" OR @zelis.com OR "@zelis.com"))</u> <u>AND (terminat* OR fire OR fired OR firing OR disciplin* OR suspen* OR reprimand* OR violat* OR review* OR eval* OR assess* OR hir* OR promot* OR demot* OR resign* OR incentiv* OR rais*)</u>
49.	<u>(compet* OR Aetna OR Cigna OR Elevance OR UnitedHealth OR United Health OR payer* OR payor* OR "dental payer*" OR "dental payor*" OR insur* OR "insurance co*" OR TPA OR "t.p.a." OR "third-party administrat*" OR "third party administrat*" OR "self fund*" OR self-fund* OR zelis OR zelis.com OR meritain OR "meritain health, inc." OR "meritain health" OR "meritain health dispute resol*" OR "the cigna group" OR "cigna group" OR humana OR united* OR "united health" OR unitedhealthgroup OR "unitedhealth group" OR "united healthgroup" OR "united healthcare" OR unitedhealthcare OR UHG OR "u.h.g." OR UHC OR "u.h.c." OR UHCG OR "u.h.c.g." OR "anthem blue cross of california" OR anthem OR "blue cross of california" OR "blue cross" OR BCCA OR "cigna health and life ins*" OR "healthscope benefits" OR healthscope OR "health scope" OR "healthscope benefits, inc." OR "UMR, inc." OR "UMR inc" OR UMR) AND ("out of network" OR OON OR out of area OR OOA OR NonPar* OR Non-Par* OR "outside the network" OR "outside of the network" OR "beyond the network" OR "out of network" OR "out-of-network" OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR "non-par*" OR non-contract* OR noncontract* OR "non contract*" OR "out-of-network sol*" OR "out of network sol*" OR "end-to-end cost contain*" OR "un contract*" OR uncontract* OR "un-contract*" OR "zelis contract*"))</u> <u>AND (terminat* OR fire OR fired OR firing OR disciplin* OR suspen* OR reprimand* OR violat* OR review* OR eval* OR assess* OR hir* OR promot* OR demot* OR resign* OR incentiv* OR rais*)</u>
50.	<u>(DeSantis Breindel OR desantisbreindel OR desantisbreindel@ OR "desantisbreindel@" OR desantis OR breindel OR "de santis breindel" OR "de santis" OR Availity OR availity OR avail* OR AHIP OR America* Health Insurance Plan* OR a.h.i.p. OR "a.h.i.p." OR "america's health insurance plan*" OR "american health insurance plan*" OR "america* health ins* plan*")</u> <u>AND (Out of Network* OR OON OR Noncontract* OR Non contract* OR Uncontract* OR Un contract* OR Nonnegotiat* OR Non-negotiat* OR "outside the network" OR "outside of the network" OR "beyond the network" OR "out-of-network" OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR NonPar* OR "non-par*" OR non-contract* OR "non contract*" OR</u>

	<u>"out-of-network sol*" OR "out of network sol*" OR "end-to-end cost contain*" OR "un-contract*" OR "zelis contract*")</u>
51.	<u>("fair health" OR fair-health OR fairhealth OR non-profit* OR "non-profit*" OR "non profit*" OR not-for-profit* OR "not-for-profit*" OR "not for profit*") AND (expir* OR end* OR terminat* OR exclusive use* OR exclusive-use* OR exclu* OR five year* OR five-year* OR five yr* OR five-yr* OR 5 year* OR 5-year* OR 5 yr* OR 5-yr* OR june 13, 2016 OR jun 13 2016 OR jun-13-2016 OR 13 June 2016 OR 13 jun 2016 OR 13-jun-2016 OR 6/13/2016 OR 6/13/16 OR 6-13-2016 OR 6.13.2016 OR 6.13.16 OR 20160613 OR 2016-06-13 OR 2016.06.13 OR "august 13, 2024" OR "aug. 13, 2024" OR "aug 13, 2024" OR aug-13-2024 OR "13 august 2024" OR "13 aug 2024" OR 13-aug-2024 OR 8/13/2024 OR 8.13.2024 OR 20240813 OR 2024-08-13 OR 2024.08.13)</u>
52.	<u>(pa* OR contract* OR sensitiv* OR "competitively sensitive" OR competitively-sensitive OR "commercially sensitive" OR commercially-sensitive OR csi* OR c.s.i. OR "c.s.i." OR c-s-i* OR "c-s-i" OR priv* OR confid* OR proprietar* OR claim* OR pric* OR sav* OR expen* OR cost* OR information* OR info* OR data* OR datum*)</u>
53.	<u>(stratose* OR strat-ose* OR stratrose* OR strat-rose* OR phx OR p.h.x. OR "pay-plus solutions" OR payplussolutions OR "payplus solutions" OR "pay plus solutions" OR pps OR p.p.s. OR truven OR trueven OR "tru ven" OR "true ven" OR ethicare OR ethi-care OR "ethi care" OR strenuus OR strennus OR strenuus OR strenuous OR strennuous OR maverest OR mavarest OR meverest OR netminder OR net-minder OR "net minder" OR redcard OR red-card OR "red card" OR "sapphire digital" OR sapphire-digital OR sapphiredigital OR "saphire digital" OR saphire-digital OR sapphiredigital OR medxoom OR medzoom OR med-xoom OR med-zoom OR "med xoom" OR "med zoom" OR payspan OR "pay-span" OR "pay span" OR allied OR "allied benefit*" OR "strategic partner") AND (zelis* OR Zellis OR Zeliious OR Zelliious OR Zelius OR Zellius OR Zealous OR zelis.com OR @zelis OR "@zelis" OR @zelis.com OR "@zelis.com")</u>
54.	<u>("500 health*" OR "750 health*" OR "770 health*" OR "500 insur*" OR "750 insur*" OR "770 insur*" OR "500 nat*" OR "750 nat*" OR "500 payor*" OR "750 payor*" OR "770 payor*" OR "500 payer*" OR "750 payer*" OR "770 payer*" OR "500 client*" OR "750 client*" OR "770 client*" OR "500 customer*" OR "750 customer*" OR "770 customer*" OR "500 repricing client*" OR "750 repricing client*" OR "770 repricing client*" OR "500 repricing customer*" OR "750 repricing customer*" OR "770 repricing customer*" OR "repricing client*" OR "repricing customer*" OR "top five" OR "top-five" OR "top 5" OR "five top" OR "5 top" OR "largest five" OR "largest 5" OR "five largest" OR "5 largest" OR "biggest five" OR "biggest 5" OR "five biggest" OR "5 biggest")</u>
55.	<u>(shar* OR sen* OR distribut* OR giv* OR gav* OR deliver* OR exchang* OR provid* OR communicat* OR convers* OR tell* OR told* OR speak* OR spok* OR talk* OR phon* OR telephon* OR tele-phon* OR "tele-phon*" OR call* OR email* OR e-mail* OR "e-mail*" OR text* OR attach* OR feed* OR trad* OR disclos* OR met* OR meet* OR know* OR knew* OR understand* OR understood* OR famil* OR recog* OR contemplat* OR consid* OR assess* OR evaluat* OR valu* OR analy* OR concern* OR saw* OR see* OR confer* OR consult* OR counsel* OR council* OR meeting* OR show* OR reveal* OR present* OR demonstrat* OR discuss*) AND ("out of network" OR OON OR "out of area" OR OOA OR NonPar* OR Non-Par* OR "outside the network" OR "outside of the network" OR "beyond the network" OR "out of network" OR "out-of-network" OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR "non-par*" OR non-contract* OR noncontract* OR "non contract*" OR "out-of-network sol*")</u>

	<u>OR "out of network sol*" OR "end-to-end cost contain*" OR "un contract*" OR uncontract* OR "un-contract*" OR "zelis contract*")</u>
56.	<u>(investigat* OR "department of justice" OR "dep't of justice" OR "dept* of justice" OR doj OR d.o.j. OR "d.o.j." OR "grand jur*" OR dol OR d.o.l. OR "d.o.l." OR "department of labor" OR "dep't of labor" OR "dept* of labor*" OR congress* OR "federal trade commission" OR ftc OR "f.t.c." OR senat* OR "house of represent*" OR h.r. OR "h.r." OR fbi OR f.b.i. OR "federal bureau of investigat*" OR "state investigat*")</u>
57.	<u>(report* OR data* OR "quant* survey*" OR generat* OR writ* OR draft* OR summar* OR author* OR explain* OR present* OR memo* OR artic* OR document* OR "doc*" OR ".doc" OR ".docx" OR "white paper*" OR whitepaper* OR white-paper* OR powerpoint* OR power-point* OR "power-point*" OR ppt* OR .ppt OR "white-paper*" OR blog* OR websit* OR web-sit* OR "web-sit*" OR "web sit*" OR media OR deliverab* OR metric* OR scor* OR index OR indic* OR dashboard* OR dash-board* OR "dash board*" OR stud* OR projection* OR estimat* OR model*) AND ("out of network" OR OON OR "out of area" OR OOA OR NonPar* OR Non-Par* OR "outside the network" OR "outside of the network" OR "beyond the network" OR "out of network" OR "out-of-network" OR o-o-n OR "o.o.n." OR onet OR "o-net*" OR "o net*" OR "non-par*" OR non-contract* OR noncontract* OR "non contract*" OR "out-of-network sol*" OR "out of network sol*" OR "end-to-end cost contain*" OR "un contract*" OR uncontract* OR "un-contract*" OR "zelis contract*")</u>
58.	<u>(architect* OR "national network*" OR "nat'l network*" OR "natl network*" OR "nationwide network*" OR "regional network*" OR "area network*" OR "local network*" OR "provider network*" OR "dental network architect*" OR "healthcare network architect*" OR "dental network*" OR "healthcare network*" OR "network* architect*" OR "primary network*" OR "secondary network*" OR "wrap network*" OR "rental network*" OR "supplement* network*" OR "specialty network*" OR "proprietary network*" OR "model preferred provider network*" OR "design preferred provider network*" OR "build preferred provider network*" OR "model ppo*" OR "design ppo*" OR "build ppo*" OR "model p.p.o*" OR "design p.p.o*" OR "build p.p.o*" OR "network analytic*" OR "network design*" OR "network* access*" OR "network* sav*" OR "network* pay*" OR "network* communic*" OR "network* manag*" OR "claim* integrit*" OR "pa* remit*" OR "our network*" OR "your network*")</u>