

**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

**NOTICE CONCERNING ZELIS HEALTHCARE, LLC, ZELIS CLAIMS INTEGRITY,
LLC, AND ZELIS NETWORK SOLUTIONS, LLC'S POSITION STATEMENT
REGARDING PROPOSED SEARCH TERMS**

Defendants Zelis Healthcare, LLC, Zelis Claims Integrity, LLC, and Zelis Network Solutions, LLC (collectively, "Zelis") respectfully submit this notice to inform the Court that the proposed search terms for Zelis that Plaintiffs submitted to the Court on September 25, Dkt. 342-1, differ in material ways from the search terms that Plaintiffs proposed to Zelis during the parties' conferrals and that were included with Zelis's submission, Dkt. 343-2. Among other things, Plaintiffs' new set of proposed search terms expanded most search term proximity connectors from w/5 or w/10 to w/25 or w/50. *See, e.g.*, Dkt. 342-1, Terms 1–17, 22, 25. Although Zelis's review of these new search terms is ongoing, based on Zelis's initial review, Plaintiffs' new proposed search terms yield an increase of approximately 100,000 document hits, not including families, over Plaintiffs' previous proposal. Zelis otherwise refers to its prior submission for its proposal regarding the appropriate search terms to be run in this case.

Dated: September 29, 2026

Respectfully Submitted,

/s/ Matthew L. McGinnis

Matthew L. McGinnis (BBO# 666120)

Jane E. Willis (BBO# 568024)

Sandra H. Masselink (BBO# 696687)

ROPES & GRAY LLP

Prudential Tower

800 Boylston Street

Boston, MA 02199

Telephone: (617) 951-7000

Matthew.McGinnis@ropesgray.com

Jane.Willis@ropesgray.com

Sandra.Masselink@ropesgray.com

Casey Kyung-Se Lee*

ROPES & GRAY LLP

1211 Avenue of the Americas

New York, NY 10036

Telephone: (212) 596-9000

Casey.Lee@ropesgray.com

*Attorneys for Defendants Zelis Healthcare,
LLC, Zelis Claims Integrity, LLC, and Zelis
Network Solutions, LLC*

CERTIFICATE OF SERVICE

I hereby certify that on September 29, 2026, I electronically filed the foregoing document with the Clerk of the Court using the Court's CM/ECF system, which will send notice of the filing to counsel of record.

Dated: September 29, 2026

/s/ Matthew L. McGinnis

Matthew L. McGinnis