



U.S. Department of Justice

*United States Attorney
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September 1, 2026

Via ECF

The Honorable Katharine H. Parker
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States of America v. Anthem, Inc.*, No. 20 Civ. 2593 (ALC) (KHP)

Dear Judge Parker:

This Office represents plaintiff the United States of America (the “Government”) in the above-referenced lawsuit. We write respectfully to request that the Court temporarily seal for thirty days, until October 1, 2026, the Government’s position statement regarding the remaining fact discovery disputes in this matter (the “Position Statement”), as well as the accompanying exhibits. *See* ECF Nos. 543, 555.¹ Specifically, the Position Statement contains quotations from the accompanying exhibits, which Anthem produced and designated as Confidential pursuant to the Stipulation and Amended Protective Order (the “Protective Order”). *See* ECF No. 485.

In light of the Court’s April 10, 2024, Order directing the parties to “make a specific showing that higher values justify” any redactions that are under seal (the “Sealing Order”), ECF No. 199, at 4, we also respectfully propose to apply the procedure set forth in the Court’s Sealing Order to the Government’s Position Statement and accompanying exhibits, such that any motion to maintain the information under seal must be filed by October 1, 2026.

Lastly, the Government respectfully seeks leave to file on the public docket a version of the Government’s Position Statement that redacts the information in question.

The Government notes that the Court has recently granted similar requests for provisional sealing in other filings in this matter. *See, e.g.*, ECF No. 544. Anthem consents to the Government’s request.

We thank the Court for its attention to this matter and consideration of the Government’s request.

¹ The Government’s Position Statement will not address any disputes arising from the parties’ interrogatory responses. In accordance with the Court’s July 22, 2026 Order, a separate position statement concerning those issues is due on September 10, 2026. *See* ECF No. 555.

Respectfully submitted,

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cc: Counsel of record (via ECF)