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September 1, 2026

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VIA ELECTRONIC DELIVERY AND COURT FILING

The Honorable Katharine H. Parker
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 750
New York, New York 10007

Re: United States v. Anthem, Inc. (Case No. 1:20-cv-02593-ALC-KHP) - Motion for Leave to File Under Seal

Dear Judge Parker:

Pursuant to Rule 3(d) of this Court's Individual Rules of Practice, Defendant Anthem, Inc. ("Anthem") writes respectfully to request permission to provisionally file documents in redacted form and under seal in connection with its Position Statement, filed pursuant to the Court's Order (Dkt. 555), in Support of its Motion to Compel Plaintiff to (i) provide testimony, pursuant to Federal Rule of Civil Procedure 30(b)(6), concerning certain topics described in Anthem's Notice of Rule 30(b)(6) Deposition; and (ii) respond to 23 Requests for Admission ("RFAs") from Anthem's First Set of Requests for Admission ("Position Statement"). Specifically, it seeks to file its Position Statement in redacted form, and Exhibits H, I, and K to the Position Statement under seal, because these materials contain confidential information or quote information that has been provisionally designated Confidential or Attorneys' Eyes Only under the parties' Joint Stipulation and Protective Order (Dkt. 485). The proposed documents to be filed provisionally under seal will be filed in accordance with the Court's sealing procedures.

Consistent with the Court's past orders and the parties' agreement, Anthem requests that the parties be permitted 30 days to either: (i) file a motion to seal that sets forth the grounds and legal basis for sealing the material, or (ii) inform the Court they do not intend to file such a motion.

On September 1, 2026, Anthem provided notice to Plaintiff of Anthem's intent to file with the Court material Plaintiff designated as Attorneys' Eyes Only and/or Confidential, and sought Plaintiff's consent to provisionally file such material under seal. Plaintiff consents to this letter motion.

Anthem therefore moves the Court for leave to file the attached documents provisionally under seal. Anthem thanks the Court for its consideration of this request.

Dated: September 1, 2026

Respectfully submitted,

By: /s/ Anwar Graves

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