



O'Melveny & Myers LLP
400 South Hope Street
Suite 1900
Los Angeles, CA 90071-2811

T: +1 213 430 6000
F: +1 213 430 6407
omm.com

September 10, 2026

Jim Bowman
D: +1 213 430 6569
jbowman@omm.com

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 two position statements, both filed pursuant to the Court's Order (Dkt. 555): (i) Anthem's Response to Plaintiff's Motion to Compel Rule 30(b)(6) Testimony (Dkt. 572) ("Anthem's Rule 30(b)(6) Dispute Response Position Statement"); and (ii) Anthem's position statement concerning disputes arising from the parties' respective interrogatory responses ("Anthem's Interrogatory Position Statement").

With respect to Anthem's Rule 30(b)(6) Dispute Response Position Statement, Anthem seeks to file the Position Statement as well as Exhibits A, B, C in redacted form, and to file Exhibits D and G under seal. With respect to Anthem's Interrogatory Position Statement, Anthem seeks to file Exhibits A and F under seal. Anthem moves the Court to file these documents in this manner 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 10, 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 these documents provisionally under seal. Anthem thanks the Court for its consideration of this request.

Dated: September 10, 2026

Respectfully submitted,

By: /s/ James A. Bowman

JAMES A. BOWMAN, *Pro Hac Vice*
ADAM LEVINE, *Pro Hac Vice*
HANNAH E. DUNHAM, *Pro Hac Vice*
SHELBY A. CUMMINGS, *Pro Hac Vice*
O'MELVENY & MYERS LLP
400 South Hope Street, 18th Floor
Los Angeles, California 90071
Telephone: (213) 430-6000
Facsimile: (213) 430-6407
jbowman@omm.com
alevine@omm.com
hdunham@omm.com
scummings@omm.com

ANWAR GRAVES, *Pro Hac Vice*
K. LEE BLALACK, II, *Pro Hac Vice*
WILLIAM BUFFALOE, *Pro Hac Vice*
BRIAN DAVID BOYLE
BENJAMIN D. SINGER
RAHUL KOHLI, *Pro Hac Vice*
O'MELVENY & MYERS LLP
1625 Eye Street, N.W.
Washington, D.C. 20006
Telephone: (202) 383-5300
Facsimile: (202) 383-5414
lblalack@omm.com
agraves@omm.com
wbuffaloe@omm.com
bboyle@omm.com
bsinger@omm.com
rkohli@omm.com

DAVID DEATON, *Pro Hac Vice*
O'MELVENY & MYERS LLP
Two Embarcadero Center, 28th Floor
San Francisco, California 94111
Telephone: (949) 823-6900
Facsimile: (949) 823-6994
ddeaton@omm.com

CHRISTOPHER P. BURKE, *Pro Hac Vice*



O'MELVENY & MYERS LLP

1301 Avenue of the Americas, Suite 1700
New York, New York 10019
Telephone: (212) 326-2000
Facsimile: (212) 326-2061
cburke@omm.com

JOHN MARTIN, *Pro Hac Vice*

HEYWARD BONYATA, *Pro Hac Vice*

NELSON MULLINS RILEY & SCARBOROUGH LLP

1320 Main Street, 17th Floor
Columbia, South Carolina 29201
Telephone: (803) 255-9655
john.martin@nelsonmullins.com
heyward.bonyata@nelsonmullins.com

Attorneys for Defendant Anthem, Inc.

cc: Assistant United States Attorney Peter M. Aronoff, Esq.
Assistant United States Attorney Zachary Bannon, Esq.
Assistant United States Attorney Charles S. Jacob, Esq.
Assistant United States Attorney Adam M. Gitlin, Esq.
Assistant United States Attorney Dana Walsh Kumar, Esq.
Assistant United States Attorney Rachael L. Doud, Esq.
Assistant United States Attorney Pierre Armand, Esq.
Assistant United States Attorney Harry Fidler, Esq.
Trial Attorney Martha Glover, Esq.