



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*86 Chambers Street
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September 10, 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 12, 2026, Exhibits A and B to the Government’s position statement regarding the remaining interrogatory disputes in this matter. Exhibit A is Anthem, Inc.’s Second Supplemental and Amended Responses and Objections to Plaintiff United States of America’s Second Set of Interrogatories. Anthem designated all but one of its responses as either “Attorneys’ Eyes Only” or “Confidential,” pursuant to the Stipulation and Amended Protective Order (the “Protective Order”). *See* ECF No. 485. Exhibit B is the Government’s responses and objections to Anthem’s Second Set of Interrogatories, which likewise contains information designated “Confidential” pursuant to the Protective Order.

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 Exhibits A and B, such that any motion to maintain the information under seal must be filed by October 12, 2026.

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. 577. Anthem consents to the Government’s request.

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

Respectfully submitted,

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cc: Counsel of record (via ECF)