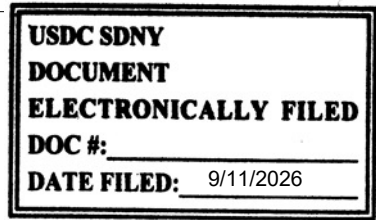




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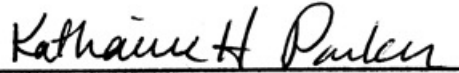
September 10, 2026

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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

APPLICATION GRANTED

 9/11/2026
Hon. Katharine H. Parker, U.S.M.J.

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

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