

Case Nos. 85525 & 85656

**In the Supreme Court of Nevada**

UNITED HEALTHCARE INSURANCE COMPANY;  
UNITED HEALTH CARE SERVICES, INC.; UMR, INC.;  
SIERRA HEALTH AND LIFE INSURANCE COMPANY,  
INC.; and HEALTH PLAN OF NEVADA, INC.,

Appellants,

*vs.*

FREMONT EMERGENCY SERVICES (MANDAVIA),  
LTD.; TEAM PHYSICIANS OF NEVADA-MANDAVIA,  
P.C.; and CRUM STEFANKO AND JONES, LTD.,

Respondents.

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Case No. 85525

UNITED HEALTHCARE INSURANCE COMPANY;  
UNITED HEALTH CARE SERVICES, INC.; UMR, INC.;  
SIERRA HEALTH AND LIFE INSURANCE COMPANY,  
INC.; and HEALTH PLAN OF NEVADA, INC.,

Petitioners,

*vs.*

THE EIGHTH JUDICIAL DISTRICT COURT of the State  
of Nevada, in and for the County of Clark; and the  
Honorable NANCY L. ALLF, District Judge,

Respondents,

*vs.*

FREMONT EMERGENCY SERVICES (MANDAVIA),  
LTD.; TEAM PHYSICIANS OF NEVADA-MANDAVIA,  
P.C.; and CRUM STEFANKO AND JONES, LTD.,

Real Parties in Interest.

Case No. 85656

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PAGES 35,813-36,062**

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325	Defendants' Reply in Support of Motion to Retax Costs	05/04/22	69	17,122–17,150
457	Defendants' Reply in Support of Motion to Seal Certain Confidential Trial Exhibits (Filed Under Seal)	01/05/22	126	31,259–31,308
37	Defendants' Reply in Support of Their Supplemental Brief in Support of Their Motions to Dismiss Plaintiff's First Amended Complaint	06/03/20	6	1340–1349
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225	Defendants' Response to TeamHealth Plaintiffs' Trial Brief Regarding Defendants' Prompt Pay Act Jury Instruction Re: Failure to Exhaust Administrative Remedies	11/16/21	40	9799–9806
12	Defendants' Statement of Removal	05/30/19	1	123–126
33	Defendants' Supplemental Brief in Support of Their Motion to Dismiss Plaintiffs' First Amended Complaint Addressing Plaintiffs' Eighth Claim for Relief	05/26/20	5	1173–1187
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481	Exhibits P473_NEW, 4002, 4003, 4005, 4006, 4166, 4168, 4455, 4457, 4774, and 5322 to “Appendix B to Order Granting in Part and Denying in Part Defendants’ Motion to Seal Certain Confidential Trial Exhibits” (Tabs 98, 106, 107, 108, 109, 111, 112, 113, 114, 118, and 119) (Filed Under Seal)	10/07/22	142	35,243–35,247
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326	Health Care Providers’ Reply in Support of Motion for Attorneys’ Fees	05/04/22	69	17,151–17,164
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167	Media Request and Order Allowing Camera Access to Court Proceedings (Dolcefino Communications, LLC)	10/28/21	28 28	6992–6997
168	Media Request and Order Allowing Camera Access to Court Proceedings (Dolcefino Communications, LLC)	10/28/21	28 29	6998–7000 7001–7003
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434	Motion to Seal Certain Confidential Trial Exhibits (Filed Under Seal)	12/13/21	111	27,401–27,495
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128	Notice of Entry of Order Affirming and Adopting Report and Recommendation No. 7 Regarding Defendants' Motion to Compel Responses to Defendants' Amended Third Set of Request for Production of Documents and Overruling Objection	09/16/21	19	4727–4747
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154	Notice of Entry of Order Denying Defendants' Motion for Order to Show Cause Why Plaintiffs Should not be Held in Contempt for Violating Protective Order	10/14/21	22	5309–5322
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173	Notice of Entry of Order Denying Defendants' Motion in Limine No. 3 to Allow Reference to Plaintiffs' Decision Making Processes Regarding Setting Billed Charges	11/01/21	29	7064–7075
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175	Notice of Entry of Order Denying Defendants' Motion in Limine No. 12, Paired with Motion in Limine No. 11, to Preclude Plaintiffs from Discussing Defendants' Approach to Reimbursement	11/01/21	29	7088–7099
176	Notice of Entry of Order Denying Defendants' Motion in Limine No. 5 Regarding Argument or Evidence that Amounts TeamHealth Plaintiffs Billed for Services are Reasonable [An Alternative Motion to Motion in Limine No. 6]	11/01/21	29	7100–7111
177	Notice of Entry of Order Denying Defendants' Motion in Limine No. 7 to Authorize Defendants to Offer Evidence of the Costs of the Services that Plaintiffs Provided	11/01/21	29	7112–7123
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181	Notice of Entry of Order Denying Defendants' Motion in Limine No. 13 Motion to Authorize Defendants to Offer Evidence Relating to Plaintiffs' Collection Practices for Healthcare Claims	11/01/21	29	7160–7171
182	Notice of Entry of Order Denying Defendants' Motion in Limine No. 14: Motion Offered in the Alternative MIL No. 13 to Preclude Plaintiffs from Contesting Defendants' Defenses Relating to Claims that were Subject to a Settlement Agreement Between CollectRx and Data iSight; and Defendants' Adoption of Specific Negotiation Thresholds for Reimbursement Claims Appealed or Contested by Plaintiffs	11/01/21	29	7172–7183
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185	Notice of Entry of Order Denying Defendants' Motion in Limine No. 20 to Exclude Defendants' Lobbying Efforts	11/01/21	29	7208–7219
186	Notice of Entry of Order Denying Defendants' Motion in Limine No. 24 to Preclude Plaintiffs from Referring to Themselves as Healthcare Professionals	11/01/21	29	7220–7231
187	Notice of Entry of Order Denying Defendants' Motion in Limine No. 27 to Preclude Evidence of Complaints Regarding Defendants' Out-Of-Network Rates or Payments	11/01/21	29	7232–7243
188	Notice of Entry of Order Denying Defendants' Motion in Limine No. 29 to Preclude Evidence Only Relating to Defendants' Evaluation and Development of a Company that Would Offer a Service Similar to Multiplan and Data iSight	11/01/21	29 30	7244–7250 7251–7255
189	Notice of Entry of Order Denying Defendants' Motion in Limine No. 32 to Exclude Evidence or Argument Relating to Materials, Events, or Conduct that Occurred on or After January 1, 2020	11/01/21	30	7256–7267
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293	Notice of Entry of Order Denying Defendants' Motion to Apply Statutory Cap on Punitive Damages	03/09/22	53	13,179–13,197
62	Notice of Entry of Order Denying Defendants' Motion to Compel Production of Clinical Documents for the At-Issue Claims and Defenses and to Compel Plaintiff to Supplement Their NRCP 16.1 Initial Disclosures on Order Shortening Time	10/27/20	11	2671–2683
78	Notice of Entry of Order Denying Defendants' Motion to Compel Responses to Defendants' First and Second Requests for Production on Order Shortening Time	02/04/21	15	3703–3713
193	Notice of Entry of Order Denying Defendants' Motion to Strike Supplement Report of David Leathers	11/01/21	30	7355–7366
353	Notice of Entry of Order Denying Defendants' Renewed Motion for Judgment as a Matter of Law	10/12/22	73	18,087–18,114
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203	Notice of Entry of Order Granting Defendants' Motion in Limine No. 25	11/04/21	33	8104–8115
204	Notice of Entry of Order Granting Defendants' Motion in Limine No. 37	11/04/21	33	8116–8127
205	Notice of Entry of Order Granting in Part and Denying in Part Defendants' Motion in Limine No. 9	11/04/21	33	8128–8140
206	Notice of Entry of Order Granting in Part and Denying in Part Defendants' Motion in Limine No. 21	11/04/21	33	8141–8153
207	Notice of Entry of Order Granting in Part and Denying in Part Defendants' Motion in Limine No. 22	11/04/21	33	8154–8165
341	Notice of Entry of Order Granting in Part and Denying in Part Defendants' Motion to Retax Costs	08/02/22	71	17,726–17,739
358	Notice of Entry of Order Granting in Part and Denying in Part Defendants' Motion to Seal Certain Confidential Trial Exhibits	10/18/22	75 76	18,609–18,750 18,751–18,755
215	Notice of Entry of Order Granting in Part and Denying in Part Plaintiffs' Motion in Limine to Exclude Evidence Subject to the	11/12/21	37	9162–9173

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242	Notice of Entry of Order Granting Plaintiffs' Motion for Leave to File Supplemental Record in Opposition to Arguments Raised for the First Time in Defendants' Reply in Support of Motion for Partial Summary Judgment	11/19/21	44	10,954–10,963
192	Notice of Entry of Order Granting Plaintiffs' Motion in Limine to Exclude Evidence, Testimony And-Or Argument Regarding the Fact that Plaintiff have Dismissed Certain Claims	11/01/21	30	7292–7354
63	Notice of Entry of Order Granting Plaintiffs' Motion to Compel Defendants' List of Witnesses, Production of Documents and Answers to Interrogatories on Order Shortening Time	10/27/20	11	2684–2695
335	Notice of Entry of Order Granting Plaintiffs' Motion to Modify Joint Pretrial Memorandum Re: Punitive Damages on Order Shortening Time	06/29/22	71	17,594–17,609
281	Notice of Entry of Order Granting Plaintiffs' Proposed Schedule for Submission of Final Redactions	01/31/22	52	12,969–12,979
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102	Notice of Entry of Order of Report and Recommendation #6 Regarding Defendants' Motion to Compel Further Testimony from Deponents Instructed Not to Answer Question	05/26/21	17	4157–4165
22	Notice of Entry of Order Re: Remand	02/27/20	3	543–552
142	Notice of Entry of Order Regarding Defendants' Objection to Special Master's Report and Recommendation No. 11 Regarding Defendants' Motion to Compel Plaintiffs' Production of Documents about which Plaintiffs' Witnesses Testified on Order Shortening Time	09/29/21	21	5104–5114
66	Notice of Entry of Order Setting Defendants' Production & Response Schedule Re: Order Granting Plaintiffs' Motion to Compel Defendants' List of Witnesses, Production of Documents and Answers to Interrogatories on Order Shortening Time	11/09/20	12	2775–2785
285	Notice of Entry of Order Shortening Time for Hearing Re: Plaintiffs' Motion to Unlock Certain Admitted Trial Exhibits	02/14/22	53	13,029–13,046
354	Notice of Entry of Order Unsealing Trial Transcripts and Restoring Public Access to Docket	10/12/22	73	18,115–18,125
86	Notice of Entry of Report and Recommendation #1	03/16/21	16	3887–3894
120	Notice of Entry of Report and Recommendation #11 Regarding Defendants' Motion to Compel Plaintiffs' Production of Documents About Which Plaintiffs'	08/11/21	18	4487–4497

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95	Notice of Entry of Report and Recommendation #3 Regarding Defendants' Motion to Compel Responses to Defendants' Second Set of Requests for Production on Order Shortening Time	04/15/21	17	4080–4091
104	Notice of Entry of Report and Recommendation #7 Regarding Defendants' Motion to Compel Plaintiffs' Responses to Defendants' Amended Third Set of Requests for Production of Documents	06/03/21	17	4173–4184
41	Notice of Entry of Stipulated Confidentiality and Protective Order	06/24/20	7	1517–1540
69	Notice of Entry of Stipulated Electronically Stored Information Protocol Order	01/08/21	12	2860–2874
289	Notice of Entry of Stipulation and Order Regarding Certain Admitted Trial Exhibits	02/17/22	53	13,074–13,097
360	Notice of Entry of Stipulation and Order Regarding Expiration of Temporary Stay for Sealed Redacted Transcripts	10/25/22	76	18,759–18,769
282	Notice of Entry of Stipulation and Order Regarding Schedule for Submission of Redactions	02/08/22	52	12,980–12,996
111	Notice of Entry Report and Recommendations #9 Regarding Pending Motions	07/01/21	18	4313–4325

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24	Notice of Intent to Take Default as to: (1) Defendant UnitedHealth Group, Inc. on All Claims; and (2) All Defendants on the First Amended Complaint's Eighth Claim for Relief	03/13/20	3 4	699–750 751
324	Notice of Posting <i>Supersedeas</i> Bond	04/29/22	69	17,114–17,121
10	Notice of Removal to Federal Court	05/14/19	1	42–100
333	Notice of Supplemental Attorneys Fees Incurred After Submission of Health Care Providers' Motion for Attorneys Fees	06/24/22	70 71	17,470–17,500 17,501–17,578
291	Objection to Plaintiffs' Proposed Judgment and Order Denying Motion to Apply Statutory Cap on Punitive Damages	03/04/22	53	13,161–13,167
345	Objection to Plaintiffs' Proposed Orders Denying Renewed Motion for Judgment as a Matter of Law and Motion for New Trial	09/13/22	72	17,941–17,950
377	Objection to R&R #11 Regarding United's (Filed Under Seal) Motion to Compel Documents About Which Plaintiffs' Witnesses Testified (Filed Under Seal)	08/25/21	84 85	20,864–20,893 20,894–20,898
320	Opposition to Defendants' Motion to Retax Costs	04/13/22	68	16,856–16,864
153	Opposition to Plaintiffs' Motion in Limine to Exclude Evidence, Testimony and/or Argument Regarding the Fact that Plaintiffs have Dismissed Certain Claims and Parties on Order Shortening Time	10/12/21	22	5301–5308



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2	Peremptory Challenge of Judge	04/17/19	1	18–19
415	Plaintiffs’ Combined Opposition to Defendants Motions in Limine 1, 7, 9, 11 & 13 (Filed Under Seal)	09/29/21	104	25,786–25,850
416	Plaintiffs’ Combined Opposition to Defendants’ Motions in Limine No. 2, 8, 10, 12 & 14 (Filed Under Seal)	09/29/21	104	25,851–25,868
145	Plaintiffs’ Motion for Leave to File Second Amended Complaint on Order Shortening Time	10/04/21	21	5170–5201
422	Plaintiffs’ Motion for Leave to File Supplemental Record in Opposition to Arguments Raised for the First Time in Defendants’ Reply in Support of Motion for Partial Summary Judgment (Filed Under Seal)	10/17/21	108	26,664–26,673
378	Plaintiffs’ Motion in Limine to Exclude Evidence Subject to the Court’s Discovery Orders (Filed Under Seal)	09/21/21	85	20,899–20,916
380	Plaintiffs’ Motion in Limine to Exclude Evidence, Testimony and/or Argument Relating to (1) Increase in Insurance Premiums (2) Increase in Costs and (3) Decrease in Employee Wages/Benefits Arising from Payment of Billed Charges (Filed Under Seal)	09/21/21	85	21,077–21,089
149	Plaintiffs’ Motion in Limine to Exclude Evidence, Testimony and-or Argument	10/08/21	22	5265–5279

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363	Plaintiffs' Motion to Compel Defendants' List of Witnesses, Production of Documents and Answers to Interrogatories on Order Shortening Time (Filed Under Seal)	09/28/20	78	19,144–19,156
49	Plaintiffs' Motion to Compel Defendants' Production of Claims File for At-Issue Claims, or, in the Alternative, Motion in Limine on Order Shortening Time	08/28/20	7 8	1685–1700 1701–1845
250	Plaintiffs' Motion to Modify Joint Pretrial Memorandum Re: Punitive Damages on Order Shortening Time	11/22/21	47	11,594–11,608
194	Plaintiffs' Notice of Amended Exhibit List	11/01/21	30	7367–7392
208	Plaintiffs' Notice of Deposition Designations	11/04/21	33 34	8166–8250 8251–8342
152	Plaintiffs' Objections to Defendants' Pretrial Disclosures	10/08/21	22	5295–5300
328	Plaintiffs' Opposition to Defendants' Motion for New Trial	05/04/22	69 70	17,179–17,250 17,251–17,335
420	Plaintiffs' Opposition to Defendants' Motion for Partial Summary Judgment (Filed Under Seal)	10/05/21	107	26,498–26,605
327	Plaintiffs' Opposition to Defendants' Motion for Remittitur and to Alter or Amend the Judgment	05/04/22	69	17,165–17,178
144	Plaintiffs' Opposition to Defendants' Motion in Limine No. 24 to Preclude Plaintiffs from Referring to Themselves as Healthcare Professionals	09/29/21	21	5155–5169
143	Plaintiffs' Opposition to Defendants' Motion	09/29/21	21	5115–5154

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	in Limine Nos. 3, 4, 5, 6 Regarding Billed Charges			
279	Plaintiffs' Opposition to Defendants' Motion to Apply Statutory Cap on Punitive Damages and Plaintiffs' Cross Motion for Entry of Judgment	01/20/22	52	12,773–12,790
374	Plaintiffs' Opposition to Defendants' Motion to Compel Plaintiffs' Production of Documents About Which Plaintiffs' Witnesses Testified on Order Shortening Time (Filed Under Seal)	07/06/21	84	20,699–20,742
25	Plaintiffs' Opposition to Defendants' Motion to Dismiss	03/26/20	4	752–783
34	Plaintiffs' Opposition to Defendants' Motion to Dismiss First Amended Complaint	05/29/20	5 6	1188–1250 1251–1293
349	Plaintiffs' Opposition to Defendants' Motion to Redact Portions of Trial Transcript	10/07/22	72	17,990–17,993
278	Plaintiffs' Opposition to Defendants' Motion to Seal Courtroom During January 12, 2022 Hearing	01/12/22	52	12,769–12,772
369	Plaintiffs' Opposition to Defendants' Motion to Supplement the Record Supporting Objections to Reports and Recommendations #2 and #3 on Order Shortening Time (Filed Under Seal)	06/01/21	81 82	20,066–20,143 20,144–20,151
329	Plaintiffs' Opposition to Defendants' Renewed Motion for Judgment as a Matter of Law	05/05/22	70	17,336–17,373
317	Plaintiffs' Opposition to Defendants' Rule 62(b) Motion for Stay	04/07/22	68	16,826–16,831
35	Plaintiffs' Opposition to Defendants' Supplemental Brief in Support of Their Motion to Dismiss Plaintiffs' First Amended	05/29/20	6	1294–1309

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83	Plaintiffs' Opposition to Motion for Reconsideration of Order Denying Defendants' Motion to Compel Plaintiffs Responses to Defendants' First and Second Requests for Production	03/04/21	16	3833–3862
55	Plaintiffs' Opposition to Motion to Compel Production of Clinical Documents for the At-Issue Claims and Defenses and to Compel Plaintiff to Supplement Their NRCP 16.1 Initial Disclosures on an Order Shortening Time	09/29/20	9-10	2224–2292
72	Plaintiffs' Opposition to Motion to Compel Responses to Defendants' First and Second Requests for Production on Order Shortening Time	01/12/21	14	3420–3438
122	Plaintiffs' Opposition to United's Motion for Order to Show Cause Why Plaintiffs Should Not Be Held in Contempt and Sanctioned for Allegedly Violating Protective Order	08/24/21	19	4528–4609
270	Plaintiffs' Opposition to United's Motion to Seal	12/29/21	50	12,323–12,341
222	Plaintiffs' Proposed Jury Instructions (Contested)	11/15/21	38 39	9496–9500 9501–9513
260	Plaintiffs' Proposed Second Phase Jury Instructions and Verdict Form	12/06/21	49	12,064–12,072
243	Plaintiffs' Proposed Special Verdict Form	11/19/21	44	10,964–10,973
227	Plaintiffs' Proposed Verdict Form	11/16/21	40	9810–9819
84	Plaintiffs' Renewed Motion for Order to Show Cause Why Defendants Should Not Be Held in Contempt and for Sanctions	03/08/21	16	3863–3883

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364	Plaintiffs' Reply in Support of Renewed Motion for Order to Show Cause Why Defendants Should Not Be Held in Contempt and for Sanctions (Filed Under Seal)	04/01/21	78	19,157–19,176
366	Plaintiffs' Response to Defendants Objection to the Special Master's Report and Recommendation No. 2 Regarding Plaintiffs' Objection to Notice of Intent to Issue Subpoena Duces Tecum to TeamHealth Holdings, Inc. and Collect Rx, Inc. Without Deposition and Motion for Protective Order (Filed Under Seal)	04/19/21	78 79	19,389–19,393 19,394–19,532
195	Plaintiffs' Response to Defendants' Objection to Media Requests	11/01/21	30	7393–7403
371	Plaintiffs' Response to Defendants' Objection to Report and Recommendation #6 Regarding Defendants' Motion to Compel Further Testimony from Deponents Instructed Not to Answer Questions (Filed Under Seal)	06/16/21	82	20,212–20,265
376	Plaintiffs' Response to Defendants' Objection to Special Master Report and Recommendation No. 9 Regarding Defendants' Renewed Motion to Compel Further Testimony from Deponents Instructed not to Answer Questions (Filed Under Seal)	07/22/21	84	20,751–20,863
110	Plaintiffs' Response to Defendants' Objection to Special Master's Report and Recommendation #7 Regarding Defendants' Motion to Compel Responses to Amended	06/24/21	18	4281–4312

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367	Plaintiffs' Response to Defendants' Objection to the Special Master's Report and Recommendation No. 3 Regarding Defendants' Motion to Compel Responses to Defendants' Second Set of Request for Production on Order Shortening Time (Filed Under Seal)	05/05/21	79	19,533–19,581
426	Plaintiffs' Response to Defendants' Trial Brief Regarding Evidence and Argument Relating to Out-of-State Harms to Non-Parties (Filed Under Seal)	11/08/21	109	26,965–26,997
246	Plaintiffs' Second Supplemental Jury Instructions (Contested)	11/20/21	46	11,255–11,261
261	Plaintiffs' Supplement to Proposed Second Phase Jury Instructions	12/06/21	49	12,072–12,077
236	Plaintiffs' Supplemental Jury Instruction (Contested)	11/17/21	42	10,308–10,313
248	Plaintiffs' Third Supplemental Jury Instructions (Contested)	11/21/21	46	11,267–11,272
216	Plaintiffs' Trial Brief Regarding Defendants' Prompt Payment Act Jury Instruction Re: Failure to Exhaust Administrative Remedies	11/12/21	37	9174–9184
223	Plaintiffs' Trial Brief Regarding Punitive Damages for Unjust Enrichment Claim	11/15/21	39	9514–9521
218	Plaintiffs' Trial Brief Regarding Specific Price Term	11/14/21	38	9417–9425
428	Preliminary Motion to Seal Attorneys' Eyes Documents Used at Trial (Filed Under Seal)	11/11/21	109	27,004–27,055
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31	Recorder's Transcript of Hearing All Pending Motions	05/15/20	5	1022–1026
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90	Recorder's Transcript of Hearing All Pending Motions	03/25/21	16	3967–3970
96	Recorder's Transcript of Hearing All Pending Motions	04/21/21	17	4092–4095
82	Recorder's Transcript of Hearing Defendants' Motion to Extend All Case Management Deadlines and Continue Trial Setting on Order Shortening Time (Second Request)	03/03/21	16	3824–3832
101	Recorder's Transcript of Hearing Motion for Leave to File Opposition to Defendants' Motion to Compel Responses to Second Set of Requests for Production on Order Shortening Time in Redacted and Partially Sealed Form	05/12/21	17	4155–4156
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213	Recorder's Transcript of Jury Trial – Day 10	11/10/21	36 37	8933–9000 9001–9152
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166	Recorder's Transcript of Jury Trial – Day 4	10/28/21	28	6775–6991
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331	Reply in Support of Defendants’ Renewed Motion for Judgment as a Matter of Law	06/22/22	70	17,386–17,411
332	Reply in Support of Motion for New Trial	06/22/22	70	17,412–17,469
87	Reply in Support of Motion for Reconsideration of Order Denying Defendants’ Motion to Compel Plaintiffs Responses to Defendants’ First and Second Requests for Production	03/16/21	16	3895–3909
344	Reply in Support of Supplemental Attorney’s Fees Request	08/22/22	72	17,935–17,940
229	Reply in Support of Trial Brief Regarding Evidence and Argument Relating to Out-Of-State Harms to Non-Parties	11/16/21	41	10,116–10,152
318	Reply on “Defendants’ Rule 62(b) Motion for Stay Pending Resolution of Post-Trial Motions” ( <i>on Order Shortening Time</i> )	04/07/22	68	16,832–16,836
245	Response to Plaintiffs’ Trial Brief Regarding Punitive Damages for Unjust Enrichment Claim	11/19/21	45 46	11,242–11,250 11,251–11,254

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231	Special Verdict Form	11/16/21	41	10,169–10,197
257	Special Verdict Form	11/29/21	49	12,035–12,046
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9	Summons – Oxford Health Plans, Inc.	05/06/19	1	38–41
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3	Summons - UMR, Inc. dba United Medical Resources	04/25/19	1	20–22
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440	Supplemental Appendix of Exhibits to Motion to Seal Certain Confidential Trial Exhibits – Volume 2 of 18 (Filed Under Seal)	12/24/21	114 115	28,291–28,393 28,394–28,484
441	Supplemental Appendix of Exhibits to Motion to Seal Certain Confidential Trial Exhibits – Volume 3 of 18 (Filed Under Seal)	12/24/21	115 116	28,485–28,643 28,644–28,742
442	Supplemental Appendix of Exhibits to Motion to Seal Certain Confidential Trial Exhibits – Volume 4 of 18 (Filed Under Seal)	12/24/21	116 117	28,743–28,893 28,894–28,938
443	Supplemental Appendix of Exhibits to Motion to Seal Certain Confidential Trial Exhibits – Volume 5 of 18 (Filed Under Seal)	12/24/21	117	28,939–29,084
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445	Supplemental Appendix of Exhibits to Motion to Seal Certain Confidential Trial Exhibits – Volume 7 of 18 (Filed Under Seal)	12/24/21	118	29,220–29,384
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451	Supplemental Appendix of Exhibits to Motion to Seal Certain Confidential Trial Exhibits – Volume 13 of 18 (Filed Under Seal)	12/24/21	122 123	30,298–30,393 30,394–30,516
452	Supplemental Appendix of Exhibits to Motion to Seal Certain Confidential Trial Exhibits – Volume 14 of 18 (Filed Under Seal)	12/24/21	123 124	30,517–30,643 30,644–30,677
453	Supplemental Appendix of Exhibits to Motion to Seal Certain Confidential Trial Exhibits – Volume 15 of 18 (Filed Under Seal)	12/24/21	124	30,678–30,835
454	Supplemental Appendix of Exhibits to Motion to Seal Certain Confidential Trial Exhibits – Volume 16 of 18 (Filed Under Seal)	12/24/21	124 125	30,836–30,893 30,894–30,952
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460	Transcript of Proceedings Re: Motions (Filed Under Seal)	01/20/22	127 128	31,597–31,643 31,644–31,650
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46	Transcript of Proceedings, Plaintiff's Motion to Compel Defendants' Production of Unredacted MultiPlan, Inc. Agreement	07/29/20	7	1644–1663
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425	Trial Brief Regarding Evidence and Argument Relating to Out-of-State Harms to Non-Parties (Filed Under Seal)	10/31/21	109	26,953–26,964
232	Trial Brief Regarding Jury Instructions on Formation of an Implied-In-Fact Contract	11/16/21	41	10,198–10,231
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485	Trial Exhibit D5506 (Filed Under Seal)		143	35,446
372	United's Motion to Compel Plaintiffs' Production of Documents About Which Plaintiffs' Witnesses Testified on Order Shortening Time (Filed Under Seal)	06/24/21	82	20,266–20,290
112	United's Reply in Support of Motion to Compel Plaintiffs' Production of Documents About Which Plaintiffs' Witnesses Testified	07/12/21	18	4326–4340



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**CERTIFICATE OF SERVICE**

I certify that on April 18, 2023, I submitted the foregoing appendix for filing *via* the Court's eFlex electronic filing system.

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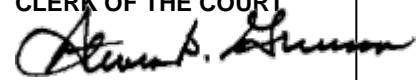
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*Attorneys for Plaintiffs*

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

FREMONT EMERGENCY SERVICES  
(MANDAVIA), LTD., a Nevada professional  
corporation; TEAM PHYSICIANS OF  
NEVADA-MANDAVIA, P.C., a Nevada  
professional corporation; CRUM,  
STEFANKO AND JONES, LTD. dba RUBY  
CREST EMERGENCY MEDICINE, a  
Nevada professional corporation,

Plaintiffs,

vs.

UNITEDHEALTH GROUP, INC., a  
Delaware corporation; UNITED  
HEALTHCARE INSURANCE COMPANY,  
a Connecticut corporation; UNITED  
HEALTH CARE SERVICES INC., dba  
UNITEDHEALTHCARE, a Minnesota  
corporation; UMR, INC., dba UNITED  
MEDICAL RESOURCES, a Delaware  
corporation; OXFORD HEALTH PLANS,  
INC., a Delaware corporation; SIERRA  
HEALTH AND LIFE INSURANCE  
COMPANY, INC., a Nevada corporation;  
SIERRA HEALTH-CARE OPTIONS, INC.,  
a Nevada corporation; HEALTH PLAN OF  
NEVADA, INC., a Nevada corporation;  
DOES 1-10; ROE ENTITIES 11-20,

Defendants.

Case No.: A-19-792978-B  
Dept. No.: XXVII

**APPENDIX OF EXHIBITS IN  
SUPPORT OF PLAINTIFFS' RENEWED  
MOTION FOR ORDER TO SHOW  
CAUSE WHY DEFENDANTS SHOULD  
NOT BE HELD IN CONTEMPT AND  
FOR SANCTIONS**

**(REDACTED VERSION)**

Plaintiffs Fremont Emergency Services (Mandavia), Ltd. ("Fremont"); Team Physicians  
of Nevada-Mandavia, P.C. ("Team Physicians"); Crum, Stefanko and Jones, Ltd. dba Ruby Crest

Emergency Medicine (“Ruby Crest” and collectively the “Health Care Providers”) file this Appendix of Exhibits in Support of its Renewed Motion for Order to Show Cause Why Defendants Should Not be Held in Contempt and for Sanctions as follows:

Exhibit No.	Exhibit Description	Bates No.
1	Identification of documents produced and related Bates-ranges	001
2	Ninth Supplemental RFP Responses	002-040
3	Out-of-Network Cost Management Programs (DEF011238) <b>ATTORNEYS’ EYES ONLY</b>	041-076
4	United’s Twenty-Seventh Supplement to Initial Disclosures, List of Documents	077-089
5	July 15, 2020 email	090-097
6	Export of Bates-number, confidentiality designation, custodian metadata fields from United’s document production; date added because no load file)	098
7	Declaration of Kristen T. Gallagher	099-102
8	Export of Bates-number, confidentiality designation, custodian and date sent metadata fields from United’s document production	103-106
9	Governance meeting spreadsheet	107-108
10	Export of Bates-number, confidentiality designation, custodian and date sent metadata fields from United’s document production	109-114
11	July 15, 2020 email chain (DEF091150) <b>ATTORNEYS’ EYES ONLY</b>	115-121
12	Extract of Data iSight reports	122-217
13	United’s Sixth Supplemental RFP Responses	218-233
14	United’s Eleventh Supplemental RFP Responses	234-247
15	United’s Fourteenth Supplemental RFP Responses	248-260
16	United’s Tenth Supplemental RFP Responses	261-274
17	United’s Fourth Supplemental Interrogatory Responses	275-286
18	March 5, 2021 email chain	287-290

Exhibit No.	Exhibit Description	Bates No.
19	Spreadsheet from Everlaw re Rosenthal custodial documents	291-292
20	December 22, 2017 email chain (DEF011050-11051) <b>CONFIDENTIAL</b>	293-294

DATED this 8th day of March, 2021.

McDONALD CARANO LLP

By: /s/ Kristen T. Gallagher

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I am an employee of McDonald Carano LLP, and that on this 8th day of March, 2021, I caused a true and correct copy of the foregoing **APPENDIX OF EXHIBITS IN SUPPORT OF PLAINTIFFS' RENEWED MOTION FOR ORDER TO SHOW CAUSE WHY DEFENDANTS SHOULD NOT BE HELD IN CONTEMPT AND FOR SANCTIONS (REDACTED VERSION)** to be served via this Court's Electronic Filing system in the above-captioned case, upon the following:

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Judge David Wall, Special Master  
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/s/ Beau Nelson  
An employee of McDonald Carano LLP



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# EXHIBIT 1

<u>Administrative Record Bates Ranges</u>	<u>Total Pages in Administrative Record</u>	<u>Total Pages Produced</u>
DEF001536-3358	1822	
DEF003359-10454	7095	
DEF011481-28026	16545	
DEF030432-45750	15318	
DEF045767-75425	29658	
DEF075429-79845	4416	
DEF080138-90984	10846	
DEF091641-97741	6100	
	<b><u>91800</u></b>	<b><u>97901</u></b>

<u>Contracts and Benefit Plan Template Bates Ranges</u>	<u>Total Number of Pages</u>
DEF0000114	1
DEF000115-DEF000122	8
DEF000128-DEF000136	9
DEF000154-DEF000156	3
DEF000722-DEF000854	133
DEF011280- DEF011293	14
DEF011295-DEF11382	88
DEF011394-DEF011396	3
DEF011411- DEF011446	36
DEF028027- DEF030189	2163
DEF030190- DEF030249	60
DEF030263-DEF30300	38
DEF94580-DEF91640	61
	<b><u>2617</u></b>

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# EXHIBIT 2

ELECTRONICALLY SERVED  
10/30/2020 10:53 PM

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18 **DISTRICT COURT**

19 **CLARK COUNTY, NEVADA**

20 FREMONT EMERGENCY SERVICES  
21 (MANDAVIA), LTD., a Nevada professional  
22 corporation; TEAM PHYSICIANS OF  
23 NEVADA-MANDAVIA, P.C., a Nevada  
24 professional corporation; CRUM, STEFANKO  
25 AND JONES, LTD. dba RUBY CREST  
26 EMERGENCY MEDICINE, a Nevada  
27 professional corporation,

28 Plaintiffs,

vs.

UNITEDHEALTH GROUP, INC., a Delaware  
corporation; UNITED HEALTHCARE  
INSURANCE COMPANY, a Connecticut  
corporation; UNITED HEALTH CARE  
SERVICES INC., dba UNITEDHEALTHCARE,  
a Minnesota corporation; UMR, INC., dba  
UNITED MEDICAL RESOURCES, a Delaware  
corporation; OXFORD HEALTH PLANS, INC., a  
Delaware corporation; SIERRA HEALTH AND  
LIFE INSURANCE COMPANY, INC., a Nevada  
corporation; SIERRA HEALTH-CARE  
OPTIONS, INC., a Nevada corporation; HEALTH  
PLAN OF NEVADA, INC., a Nevada  
corporation; DOES 1-10; ROE ENTITIES 11-20,

Defendants.

///

Case No.: A-19-792978-B  
Dept. No.: 27

**DEFENDANTS' NINTH  
SUPPLEMENTAL RESPONSES TO  
FREMONT EMERGENCY SERVICES  
(MANDAVIA) LTD.'S FIRST SET OF  
REQUESTS FOR PRODUCTION OF  
DOCUMENTS**



1 Defendants UnitedHealth Group, Inc., UnitedHealthcare Insurance Company, United  
2 HealthCare Services Inc., UMR, Inc., Oxford Health Plans, Inc., Sierra Health and Life  
3 Insurance Co., Inc., Sierra Health-Care Options, Inc., and Health Plan of Nevada, Inc. ("United  
4 HealthCare"), by and through their attorneys of the law firm of Weinberg Wheeler Hudgins  
5 Gunn & Dial, LLC, hereby submit these supplemental responses to Plaintiff's ("Plaintiff" or  
6 "Fremont") First Set of Requests for Production of Documents ("Requests") as follows  
7 **(supplemental responses in bold):**

8 **PRELIMINARY STATEMENT**

9 Defendants have made diligent efforts to respond to the Requests, but reserve the right  
10 to change, amend, or supplement their responses and objections. Defendants also reserve the  
11 right to use discovered documents and documents now known, but whose relevance,  
12 significance, or applicability has not yet been ascertained. Additionally, Defendants do not  
13 waive their right to assert any and all applicable privileges, doctrines, and protections, and  
14 hereby expressly state their intent and reserve their right to withhold responsive information  
15 on the basis of any and all applicable privileges, doctrines, and protections.

16 Defendants' responses are made without in any way waiving or intending to waive, but on  
17 the contrary, intending to preserve and preserving, their right, in this litigation or any subsequent  
18 proceeding, to object on any grounds to the use of documents produced in response to the  
19 Request, including objecting on the basis of authenticity, foundation, relevancy, materiality,  
20 privilege, and admissibility of any documents produced in response to the Requests.

21 The documents produced in conjunction with these supplemental responses are being  
22 produced subject to the confidentiality and attorneys' eyes only protections permitted pursuant to  
23 Section 3(f) of the Stipulation and Order Re: Pending Matters that was entered on May 15, 2020  
24 and pursuant to the terms of Confidentiality and Protective Order that the Parties are currently in  
25 the process of negotiating.

26 Defendants are limiting their responses to the Requests to the reasonable time-frame  
27 of July 1, 2017 to present ("Relevant Period") and object to the Requests to the extent that  
28 Plaintiff fails to limit the Requests to a specific time period.

**SPECIFIC OBJECTIONS TO PLAINTIFF'S DEFINITIONS, INSTRUCTIONS,  
AND RULES OF CONSTRUCTION**

1  
2  
3 1. Defendants object to the "Instructions," "Definitions," and "Rules of  
4 Construction" accompanying the Requests to the extent they purport to impose any obligation  
5 on Defendants different from or greater than those imposed by the Nevada Rules of Civil  
6 Procedure.

7 2. Defendants object to the "Instructions," "Definitions," and "Rules of  
8 Construction" to the extent they purport to require the production of Protected Health  
9 Information or other confidential or proprietary information without confidentiality  
10 protections sufficient to protect such information from disclosure, such as those found in the  
11 Confidentiality and Protective Order entered on June 24, 2020.

12 3. Defendants object to the definition of "Claim" or "Claims" as vague, not  
13 described with reasonable particularity, overbroad, unduly burdensome, not relevant to the  
14 claims or defenses in this case, and not proportional to the needs of this case to the extent  
15 they (1) include claims not specifically identified by Plaintiff in FESM000011, or (2) relate  
16 to claims, patients, or health benefits plans for which Defendants are not responsible for the  
17 at-issue claims administration.

18 4. Defendants object to the definition of "Data iSight" as vague, not described with  
19 reasonable particularity, overbroad, unduly burdensome, not relevant to the claims or defenses  
20 in this case, and not proportional to the needs of this case. Defendants contend that Plaintiff  
21 does not fully or accurately describe Data iSight, which is a service offered by MultiPlan, Inc.  
22 that provides pricing information concerning medical claims.

23 5. Defendants object to the definition of "Document," "Communication," and  
24 "Communicate" to the extent those terms include within their scope materials, at to the  
25 Requests, to the extent they seek documents or information protected by the attorney-client  
26 privilege, the attorney work product doctrine, the settlement privilege, or any other applicable  
27 privilege, including, but not limited to: information that was prepared for, or in anticipation of,  
28 litigation; that contains or reflects the analysis, mental impressions, or work of counsel; that



1 contains or reflects attorney-client communications; or that is otherwise privileged.

2           6. Defendants object to the definition of the terms "Defendants," as used in the  
3 context of the Requests, and "You," and/or "Your" as vague, not described with reasonable  
4 particularity, overbroad, unduly burdensome, not proportional to the needs of the case, and  
5 seeking information that is not relevant to the outcome of any claims or defenses in this  
6 litigation. Plaintiff's definition includes, for example, "predecessors-in-interest," "partners,"  
7 "any past or present agents," and "every person acting or purporting to act, or who has ever  
8 acted or purported to act, on their behalf," which suggests that Plaintiff seeks materials  
9 beyond Defendants' possession, custody, or control. Defendants will not search for or  
10 produce materials beyond their possession, custody, or control. Defendants have answered  
11 the Requests on behalf of Defendants, *as defined herein*, only based upon Defendants'  
12 knowledge, materials and information in Defendants' possession, and belief formed after  
13 reasonable inquiry.

14           7. Defendants object to the definition of "Fremont" as vague, not described with  
15 reasonable particularity, overbroad, unduly burdensome, not proportional to the needs of the  
16 case, and seeking information that is not relevant to the outcome of any claims or defenses  
17 in this litigation Plaintiff's definition includes, for example, "any past or present agents,"  
18 "representatives," "partners," "predecessors-in-interest," "affiliates," and "every person  
19 acting or purporting to act, or who has ever acted or purported to act, on [its] behalf" without  
20 identifying these entities or persons with reasonable particularity, and creating an undue  
21 burden by requiring Defendants to identify them. In responding to the Requests, Defendants  
22 will construe "Fremont" to refer to those parties who were known to have been affiliated  
23 with Fremont Emergency Services (Mandavia), Ltd. during the Relevant Period.

24           8. Defendants object to the definition of "Emergency Services and Care,"  
25 "Emergency Medicine Services," and "Emergency Department Services" as vague, not  
26 described with reasonable particularity, overbroad, unduly burdensome, not relevant to the  
27 claims or defenses in this case, and not proportional to the needs of this case to the extent they  
28 (1) include any medical services not related to the at-issue claims, or (2) relate to any medical

1 services for claims, patients, or health benefits plans for which Defendants are not responsible  
2 for the at-issue claims administration.

3 9. Defendants object to the definition of "Nonemergency Services and Care" as  
4 vague, not described with reasonable particularity, overbroad, unduly burdensome, not  
5 relevant to the claims or defenses in this case, and not proportional to the needs of this case  
6 to the extent it (1) includes services by not related to the at-issue claims, or (2) relates to the  
7 services for claims, patients, or health benefits plans for which Defendants are not  
8 responsible for the at-issue claims administration.

9 10. Defendants object to the definition of "Non-Participating Provider," "Non-  
10 Network Provider," "Participating Provider," and "Network Provider" as vague, not  
11 described with reasonable particularity, overbroad, unduly burdensome, not relevant to the  
12 claims or defenses in this case, and not proportional to the needs of this case to the extent  
13 they (1) include persons or entities that are not parties to this case, or (2) concern persons or  
14 entities unrelated to the at-issue claims.

15 11. Defendants object to the definition of "Plans" and "Plan Members" as vague,  
16 not described with reasonable particularity, overbroad, unduly burdensome, not relevant to  
17 the claims or defenses in this case, and not proportional to the needs of this case to the  
18 extent they (1) include health benefits plans and members of such plans not specifically  
19 identified by Plaintiff, (2) include health benefits plans that are not related to the at-issue  
20 claims, or (3) are referring to health benefits plans for which Defendants are not responsible  
21 for the at-issue claims administration.

22 12. Defendants object to the definition of "Provider" as vague, not described with  
23 reasonable particularity, overbroad, unduly burdensome, not relevant to the claims or defenses  
24 in this case, and not proportional to the needs of this case to the extent it (1) includes persons  
25 or entities that are not parties to this case, or (2) concern persons or entities unrelated to the  
26 at-issue claims.

27 13. Defendants object to Instruction No. 1 as vague and not described with reasonable  
28 particularity, as it uses the term Defendant, in the singular, without defining which of the



1 Defendants it is referring to. Defendants also object to Instruction No. 1 to the extent it seeks to  
2 impose obligations and/or penalties on Defendants beyond what is contemplated by the Nevada  
3 Rules of Civil Procedure or applicable local rules.

4 14. Defendants object to Instruction Nos. 2, 3, 4, 5, 6, 7, and 8 to the extent they seek  
5 to impose obligations and/or penalties on Defendants beyond what is contemplated by the  
6 Nevada Rules of Civil Procedure.

7 15. Defendants object to Instruction No. 9 as unduly burdensome and not  
8 proportional to the needs of the case insofar as it asks Defendants to provide "[for each  
9 document produced, identify the specific document request number or numbers to which the  
10 document is responsive." Defendants also object to Instruction No. 9 to the extent it seeks to  
11 impose obligations and/or penalties on Defendants beyond what is contemplated by the  
12 Nevada Rules of Civil Procedure.

13 16. Defendants object to Instruction Nos. 10, 11, and 12 to the extent they seek to  
14 impose obligations and/or penalties on Defendants beyond what is contemplated by the Nevada  
15 Rules of Civil Procedure.

16 17. Defendants object to Instruction No. 13 as unduly burdensome and not  
17 proportional to the needs of the case insofar as it asks Defendants to provide the name of  
18 "the person you believe to have possession of the missing documents, and the facts upon  
19 which you base your response." Defendants also object to Instruction No. 13 to the extent it  
20 seeks to impose obligations and/or penalties on Defendants beyond what is contemplated by  
21 the Nevada Rules of Civil Procedure.

## 22 **RESPONSES TO REQUESTS FOR PRODUCTION OF DOCUMENTS**

### 23 **REQUEST FOR PRODUCTION NO. 5:**

24 Produce any and all Documents and/or Communications relating to Your determination  
25 and/or calculation of the allowed amount and reimbursement for any of the CLAIMS, including  
26 the following: (i) the method by which the allowed amount and reimbursement for the Claim was  
27 calculated; (ii) the total amount You allowed and agreed to pay; (iii) any contractual or other  
28 allowance taken; and (iv) the method, date, and final amount of payment.

1 **RESPONSE:**

2 Subject to and without waiving Defendants' objections, including Defendants' specific  
3 objections to Plaintiff's Definitions, Instructions and Rules of Construction, Defendants state as  
4 follows: Defendants object that the term "CLAIM" is vague, as noted in Defendants' objections  
5 to Plaintiff's Definitions, as the definition does not identify what specific list of claims it is  
6 referring to. However, Defendants interpret this Request as referring to the claims listed in  
7 FESM000011. Assuming those are the claims Fremont intended to refer to, Defendants object to  
8 this Request on the basis that it is unduly burdensome and seeks information that is not  
9 proportional to the needs of the case. Fremont has asserted 15,210 CLAIMS where it alleges that  
10 Defendants did not reimburse Fremont for the full amount billed. To produce the documents and  
11 communications related to the four categories set forth in this Request (i.e. (i) the reimbursement  
12 methodology, (ii) the total amount allowed and agreed to pay, (iii) any contractual or other  
13 allowance taken and (iv) the method, date and final amount of payment), Defendants would,  
14 among other things, have to pull the administrative record for each of the 15,210 individual  
15 CLAIMS, review the records for privileged/protected information and then produce them. As  
16 explained more fully in the burden declaration attached as Exhibit 1, this would be unduly  
17 burdensome as Defendants believe it will take 2 hours to pull each individual claim file for a  
18 total of 30,420 hours of employee labor.

19 Defendants further object to categories (ii), (iii) and (iv) of this Request as they seek  
20 information that is equally, if not more accessible, to Fremont. There is no justification for  
21 imposing the burden on Defendants to identify, collect, review, and produce such documents  
22 when Fremont already possesses the same.

23 Moreover, the request is overbroad, unduly burdensome, not reasonably particular, and  
24 not proportional to the needs of the case as it essentially requests all documents related to the  
25 parties' claims and defenses. It would be essentially impossible for Defendants to perform the  
26 investigation necessary to identify all documents and communications that in some way relate to  
27 the determination and calculation of the allowed amounts for all of the 15,210 CLAIMS.

28 ///

1 Defendants request that Fremont meet and confer to narrow the scope of this request and  
2 provide some semblance of reasonable particularity with respect to the type of documents they  
3 are seeking so as to reduce the burden imposed on Defendants.

4 **Responding further, subject to and without waiving Defendants' objections: please**  
5 **see documents previously produced as DEF001536–DEF010454, and documents**  
6 **forthcoming, beginning at DEF011481. Defendants have made diligent efforts to respond**  
7 **to the Requests, but reserve the right to supplement their responses and objections.**

8 **REQUEST FOR PRODUCTION NO. 6:**

9 Produce any and all Documents and/or Communications relating to Your decision to  
10 reduce payment for any CLAIM.

11 **RESPONSE:**

12 Subject to and without waiving Defendants' objections, including Defendants' specific  
13 objections to Plaintiff's Definitions, Instructions and Rules of Construction, Defendants state as  
14 follows: Defendants object that the term "CLAIM" as vague, as noted in Defendants' objections  
15 to Plaintiff's Definitions, as the definition does not identify what specific list of claims it is  
16 referring to. However, Defendants interpret this Request as referring to the claims listed in  
17 FESM000011. Assuming those are the claims Fremont intended to refer to, Defendants object to  
18 this Request on the basis that it is unduly burdensome and seeks information that is not  
19 proportional to the needs of the case. Fremont has asserted 15,210 CLAIMS where it alleges that  
20 Defendants did not reimburse Fremont for the full amount billed. To produce the documents and  
21 communications related to any decision to reduce payment on a CLAIM, Defendants would,  
22 among other things, have to pull the administrative record for each of the 15,210 individual  
23 CLAIMS, review the records for privileged/protected information and then produce them. As  
24 explained more fully in the burden declaration attached as Exhibit 1, this would be unduly  
25 burdensome as Defendants believe it will take 2 hours to pull each individual claim file for a  
26 total of 30,420 hours of employee labor..

27 Moreover, the request is overbroad, unduly burdensome, not reasonably particular, and  
28 not proportional to the needs of the case as it essentially requests all documents related to the

1 parties' claims and defenses. It would be essentially impossible for Defendants to perform the  
2 investigation necessary to identify all documents and communications that in some way relate to  
3 the decision to not pay the full billed charges on all of the 15,210 CLAIMS.

4 Responding further, subject to and without waiving Defendants' objections: please see  
5 documents produced concurrently herewith as DEF010455-DEF010554.

6 **Responding further, subject to and without waiving Defendants' objections: please**  
7 **see documents previously produced as DEF001536-DEF010454, and documents**  
8 **forthcoming, beginning at DEF011481. Defendants have made diligent efforts to respond**  
9 **to the Requests, but reserve the right to supplement their responses and objections.**

10 **REQUEST FOR PRODUCTION NO. 7:**

11 Produce any and all Documents and/or Communications supporting or relating to Your  
12 contention or belief that You are entitled to pay or allow less than Fremont's full billed charges  
13 for any of the CLAIMS.

14 **RESPONSE:**

15 Subject to and without waiving Defendants' objections, including Defendants' specific  
16 objections to Plaintiff's Definitions, Instructions and Rules of Construction, Defendants state as  
17 follows: Defendants object that the term "CLAIM" is vague, as noted in Defendants' objections  
18 to Plaintiff's Definitions, as the definition does not identify what specific list of claims it is  
19 referring to. However, Defendants interpret this Request as referring to the claims listed in  
20 FESM000011. Assuming those are the claims Plaintiff intended to refer to, Defendants object  
21 to this Request on the basis that it is unduly burdensome and seeks information that is not  
22 proportional to the needs of the case. Plaintiff has asserted 15,210 CLAIMS where it alleges that  
23 Defendants did not reimburse Plaintiff for the full amount billed. To produce the documents and  
24 communications related to any decision to pay or allow less than Plaintiff's full billed charges on  
25 a CLAIM, Defendants would, among other things, have to pull the administrative record for each  
26 of the 15,210 individual CLAIMS, review the records for privileged/protected information and  
27 then produce them. As explained more fully in the burden declaration attached as Exhibit 1, this  
28 would be unduly burdensome as Defendants believe it will take 2 hours to pull each individual

1 claim file for a total of 30,420 hours of employee labor.

2 Moreover, the request is overbroad, unduly burdensome, not reasonably particular, and  
3 not proportional to the needs of the case as it essentially requests all documents related to the  
4 parties' claims and defenses. It would be essentially impossible for Defendants to perform the  
5 investigation necessary to identify all documents and communications that in some way relate to  
6 the decision to not pay the full billed charges on all of the 15,210 CLAIMS.

7 Responding further, subject to and without waiving Defendants' objections: please see  
8 documents produced concurrently herewith as DEF010455-DEF010554.

9 **Responding further, subject to and without waiving Defendants' objections: please**  
10 **see documents previously produced as DEF000722-DEF000854, and documents produced**  
11 **concurrently herewith as DEF011090-DEF011210, DEF011295-DEF011382, DEF011384-**  
12 **DEF011396, and DEF011411-DEF011446. Defendants have made diligent efforts to**  
13 **respond to the Requests, but reserve the right to supplement their responses and**  
14 **objections.**

15 **REQUEST FOR PRODUCTION NO. 8:**

16 If you contend that any course of prior business dealing(s) by and between You and  
17 Fremont entitle(s) You to pay less than Fremont's full billed charges for any of the CLAIMS, or  
18 is otherwise relevant to the amounts paid for any of the CLAIMS, produce any Documents  
19 and/or Communications relating to any such prior course of business dealing(s)

20 **RESPONSE:**

21 Subject to and without waiving Defendants' objections, including Defendants' specific  
22 objections to Plaintiff's Definitions, Instructions and Rules of Construction, Defendants state as  
23 follows: Defendants object that the phrase "prior business dealing(s)" is vague. Defendants are  
24 not certain what is intended by this phrase and are thus unable to determine whether or not they  
25 would make the contention referenced in this Request (i.e. is Fremont referring to prior payments  
26 by Defendants to Fremont, prior contracts between Defendants and Fremont, etc.). Defendants  
27 request clarification as what is meant by this phrase and Defendants will then supplement their  
28 response to this Request, if supplementation is warranted.

1 Defendants further object that documentation of prior business dealings between  
2 Defendants and Fremont would necessarily be possessed by Fremont. There is no justification  
3 for imposing the burden on Defendants to identify, collect, review, and produce such documents  
4 when Fremont already possesses the same.

5 **Responding further, subject to and without waiving Defendants' objections: please**  
6 **see documents produced concurrently herewith as DEF10559–DEF011089. Defendants**  
7 **have made diligent efforts to respond to this Request, but reserve the right to**  
8 **supplement their response and objections.**

9 **REQUEST FOR PRODUCTION NO. 9:**

10 If you contend that any agreement(s) by and between You and Fremont entitles You to  
11 pay less than Fremont's full billed charges for any of the CLAIMS, or is otherwise relevant to  
12 the amounts paid for any of the CLAIMS, produce any Documents and/or Communications  
13 relating to any agreements(s).

14 **RESPONSE:**

15 Subject to and without waiving Defendants' objections, including Defendants' specific  
16 objections to Plaintiff's Definitions, Instructions and Rules of Construction, Defendants state as  
17 follows: During the time period after which Fremont became a non-participating, out-of-network  
18 provider, Defendants are not currently aware of any direct written participation agreement  
19 between Defendants and Fremont that would govern the amount of reimbursement (if any) for  
20 the CLAIMS. However, there may be other contracts/agreements that governed the amount of  
21 reimbursement for each CLAIM, including, but not limited to, the applicable health benefits plan  
22 documents. Defendants are continuing to attempt to determine whether any such  
23 contracts/agreements exist and will supplement this response, if any such contracts or  
24 agreements are found.

25 **Responding further, subject to and without waiving Defendants' objections: please**  
26 **see documents produced concurrently herewith as DEF11295–DEF011382, DEF011384–**  
27 **DEF011396, and DEF011411–DEF011446. Defendants have made diligent efforts to**  
28 **respond to this Request, but reserve the right to supplement their response and**

1 objections.

2 **REQUEST FOR PRODUCTION NO. 10:**

3 Produce any and all Documents and/or Communications relating to the methodology You  
4 currently use, or used during calendar or Plan years 2016, 2017, 2018 and/or 2019 to determine  
5 and/or calculate Your reimbursement of Non-Participating Providers in Nevada for Emergency  
6 Medicine Services.

7 **RESPONSE:**

8 Subject to and without waiving Defendants' objections, including Defendants' specific  
9 objections to Plaintiff's Definitions, Instructions and Rules of Construction, Defendants state as  
10 follows: Defendants object that this Request is overbroad, unduly burdensome and seeks  
11 information that is not relevant and not proportional to the needs of the case. This Request is  
12 overbroad as it seeks information on methodologies used prior to July 1, 2017 (the date of the  
13 first claim Fremont is asserting). This Request is also overbroad as it seeks information on the  
14 methodologies used to calculate reimbursement rates for all non-participating emergency  
15 services providers in Nevada, as opposed to being limited to information related to  
16 methodologies used to calculate the rate of reimbursement on the claims Fremont is asserting in  
17 this litigation. The information sought in this Request is also not relevant as Defendants often  
18 use different reimbursement methodologies depending on, for example, the particular claim,  
19 provider, and/or the applicable health benefits plan documents.

20 Defendants request that Fremont meet and confer to narrow the scope of this Request to  
21 ensure that it is not unduly burdensome to Defendants and that Fremont is able to get the  
22 information it is seeking.

23 **Responding further, subject to and without waiving Defendants' objections: please**  
24 **see documents produced concurrently herewith as DEF011212–DEF011273. Defendants**  
25 **have made diligent efforts to respond to this Request, but reserve the right to**  
26 **supplement their response and objections.**

27 **REQUEST FOR PRODUCTION NO. 13:**

28 Produce all Documents and/or Communications concerning, evidencing, or relating to



1 any negotiations or discussions concerning Non-Participating Provider reimbursement rates  
2 between You and Fremont, including, without limitation, documents and/or communications  
3 relating to the meeting in or around December 2017 between You, including, but not limited to,  
4 Dan Rosenthal, John Haben, and Greg Dosedel, and Fremont, where Defendants proposed new  
5 benchmark pricing program and new contractual rates.

6 **RESPONSE:**

7 Subject to and without waiving Defendants' objections, including Defendants' specific  
8 objections to Plaintiff's Definitions, Instructions and Rules of Construction, Defendants state as  
9 follows: Defendants object that this Request is unduly burdensome and seeks information that is  
10 not proportional to the needs of the case. Fremont has asserted 15,210 claims where it alleges  
11 that Defendants did not reimburse Fremont for the full amount billed. To produce the documents  
12 and communications that relate to any discussions or negotiations over the reimbursement rates  
13 on those claims, Defendants would, among other things, have to pull the administrative record  
14 for each of the 15,210 individual claims, review the records for privileged/protected information  
15 and then produce them. As explained more fully in the burden declaration attached as Exhibit 1,  
16 this would be unduly burdensome as Defendants believe it will take 2 hours to pull each  
17 individual claim file for a total of 30,420 hours of employee labor.

18 Moreover, all documents and communications exchanged between Defendants and  
19 Fremont would necessarily be possessed by Fremont. There is no justification for imposing the  
20 burden on Defendants to identify, collect, review, and produce such documents when Fremont  
21 already possesses the same.

22 Defendants further respond by referring Fremont to the following bates numbered  
23 documents produced with these responses that relate to negotiations between Fremont and the  
24 Sierra Defendants: DEF000114 – DEF000156. For the other aspects of this Request that were  
25 objected to, Defendants request that Plaintiff meet and confer to narrow the scope of this Request  
26 to ensure that it is not unduly burdensome to Defendants, seeks relevant information and that  
27 Plaintiff is able to get the information it is seeking.

28 ///



1       **Responding further, subject to and without waiving Defendants' objections: please**  
2 **see documents produced concurrently herewith as DEF010559–DEF011089. Defendants**  
3 **have made diligent efforts to respond to this Request, but reserve the right to**  
4 **supplement their response and objections.**

5 **REQUEST FOR PRODUCTION NO. 14:**

6       Produce all Documents regarding rates insurers and/or payors other than You have paid  
7 for Emergency Services and Care in Nevada to either or both Participating or Non-Participating  
8 Providers from July 1, 2016, to the present.

9 **RESPONSE:**

10       Subject to and without waiving Defendants' objections, including Defendants' specific  
11 objections to Plaintiff's Definitions, Instructions and Rules of Construction, Defendants state as  
12 follows: Defendants object that this Request seeks information that is not within its possession,  
13 custody or control. To the extent Plaintiff believes this information would be within  
14 Defendants' possession, custody or control, Defendants request that Plaintiff clarify this Request.  
15 Defendants further object that this Request is overbroad and unduly burdensome as it appears to  
16 seek documents on all emergency medical services claims that have ever been paid by any  
17 insurer or payor in Nevada during the specified time frame. Thus, the Request likely covers  
18 hundreds of thousands of claims for payment and seeks information that is not proportional to  
19 the needs of this litigation. Defendants further object that this Request is overbroad as it seeks  
20 information starting on July 1, 2016, but the earliest claim Fremont has asserted is dated July 1,  
21 2017. Defendants further state that to the extent Defendants do have any responsive documents  
22 these document would likely be publicly available to Plaintiff as well.

23       **By way of further response, subject to and without waiving Defendants' objections,**  
24 **United does not receive rate information from other insurers and/or payors. However,**  
25 **United refers Plaintiffs to DEF011072, produced concurrently herewith.**

26 **REQUEST FOR PRODUCTION NO. 15:**

27       Produce all Documents and/or Communications, reflecting, analyzing, or discussing the  
28 methodology you used to calculate or determine Non-Participating Provider reimbursement rates

1 for Emergency Services in Nevada, including, but not limited to, any documents and/or  
2 communications you used or created in the process of calculating and/or determining the  
3 prevailing charges, the reasonable and customary charges, the usual and customary charges, the  
4 average area charges, the reasonable value, and/or the fair market value for Emergency Services  
5 in Clark County.

6 **RESPONSE:**

7 Subject to and without waiving Defendants' objections, including Defendants' specific  
8 objections to Plaintiff's Definitions, Instructions and Rules of Construction, Defendants state as  
9 follows: Defendants object that this Request is overbroad, unduly burdensome and seeks  
10 information that is not relevant and not proportional to the needs of the case since it is not limited  
11 to a specific time frame and/or not limited to the methodology used to calculate reimbursement  
12 rates for emergency services provided by Fremont, as opposed to other non-party emergency  
13 services providers. Rather, this improper Request appears to seek documents and  
14 communications relating to rates of reimbursement to providers other than Fremont.

15 A portion of this Request does seek relevant information as Fremont is a non-  
16 participating provider that provides emergency services in Nevada. However, that portion of this  
17 Request, as currently framed, is unduly burdensome and seeks information that is not  
18 proportional to the needs of the case. Fremont has asserted 15,210 claims where it alleges that  
19 Defendants did not reimburse Fremont for the full amount billed. To produce the documents and  
20 communications that relate to the methodology used to calculate the amount of reimbursement  
21 paid on Fremont's claims, Defendants would, among other things, have to pull the administrative  
22 record for each of the 15,210 individual claims, review the records for privileged/protected  
23 information and then produce them. As explained more fully in the burden declaration attached  
24 as Exhibit 1 to, this would be unduly burdensome as Defendants believe it will take 2 hours to  
25 pull each individual claim file for a total of 30,420 hours of employee labor.

26 Responding further, subject to and without waiving Defendants' objections: please see  
27 document produced concurrently herewith as DEF010558.

28 **Responding further, subject to and without waiving Defendants' objections: please**

1 see documents produced concurrently herewith as DEF011212–DEF011273. Defendants  
2 have made diligent efforts to respond to this Request, but reserve the right to  
3 supplement their response and objections.

4 **REQUEST FOR PRODUCTION NO. 16:**

5 Produce all Documents that refer, relate or otherwise reflect shared savings programs in  
6 Nevada for Fremont’s out-of-network claims from July 1, 2017 to present. This request  
7 includes, without limitation, contracts with third parties regarding Your shared savings program,  
8 amounts invoiced by You to third parties for the shared savings program for Fremont’s out-of-  
9 network claims, amount You were compensated for the shared savings program for Fremont’s  
10 out-of-network claims.

11 **RESPONSE:**

12 Subject to and without waiving Defendants’ objections, including Defendants’ specific  
13 objections to Plaintiff’s Definitions, Instructions and Rules of Construction, Defendants state as  
14 follows: Defendants object that this Request seeks information that is not relevant to Plaintiff’s  
15 claims and not proportional to the needs of the case. Defendants further object that this Request  
16 is vague in regard to what is meant by “shared savings programs.” Defendants request that  
17 Plaintiff clarify what is meant by this term so that Defendants can determine whether they have  
18 responsive documents in their possession.

19 Defendants further object that this Request is unduly burdensome and seeks information  
20 that is not proportional to the needs of the case. Fremont has asserted 15,210 claims where it  
21 alleges that Defendants did not reimburse Fremont for the full amount billed. To produce the  
22 documents that relate to amounts invoiced to third parties for those claims and amounts received  
23 by Defendants, Defendants would, among other things, have to pull the administrative record for  
24 each of the 15,210 individual claims, review the records for privileged/protected information  
25 and then produce them. As explained more fully in the burden declaration attached as Exhibit 1,  
26 this would be unduly burdensome as Defendants believe it will take 2 hours to pull each  
27 individual claim file for a total of 30,420 hours of employee labor.

28 Defendants request that Plaintiff meet and confer to narrow the scope of this Request to

1 ensure that it is not unduly burdensome to Defendants and that Plaintiff is able to get the  
2 information it is seeking.

3 **Responding further, subject to and without waiving Defendants' objections: please**  
4 **see documents previously produced as DEF000722–DEF000854, and documents produced**  
5 **concurrently herewith as DEF011090–DEF011210. Defendants have made diligent efforts**  
6 **to respond to the Requests, but reserve the right to supplement their responses and**  
7 **objections.**

8 **REQUEST FOR PRODUCTION NO. 17:**

9 All Communications between You and any third-party, relating to (a) any CLAIM for  
10 payment for medical services rendered by Fremont to any Plan Member, or (b) any medical  
11 services rendered by Fremont to any Plan member.

12 **RESPONSE:**

13 Subject to and without waiving Defendants' objections, including Defendants' specific  
14 objections to Plaintiff's Definitions, Instructions and Rules of Construction, Defendants state as  
15 follows: Defendants object that the term "CLAIM" is vague, as noted in Defendants' objections  
16 to Plaintiff's Definitions, as the definition does not identify what specific list of claims it is  
17 referring to. However, Defendants interpret this Request as referring to the claims listed in  
18 FESM000011. Assuming those are the claims Fremont intended to refer to, Defendants object  
19 to this Request on the basis that it is unduly burdensome and seeks information that is not  
20 proportional to the needs of the case. Fremont has asserted 15,210 CLAIMS where it alleges that  
21 Defendants did not reimburse Fremont for the full amount billed. To produce the  
22 communications between Defendants and third parties related to those CLAIMS, Defendants  
23 would, among other things, have to pull the administrative record for each of the 15,210  
24 individual CLAIMS, review the records for privileged/protected information and then produce  
25 them. As explained more fully in the burden declaration attached as Exhibit 1, this would be  
26 unduly burdensome as Defendants believe it will take 2 hours to pull each individual claim file  
27 for a total of 30,420 hours of employee labor.

28 Defendants request that Plaintiff meet and confer to narrow the scope of this Request to

1 ensure that it is not unduly burdensome to Defendants and that Plaintiff is able to get the  
2 information it is seeking.

3 **Responding further, subject to and without waiving Defendants' objections: please**  
4 **see documents previously produced as DEF001536–DEF010454, and DEF010555 and**  
5 **documents forthcoming, beginning at DEF011481. Defendants have made diligent efforts**  
6 **to respond to the Requests, but reserve the right to supplement their responses and**  
7 **objections.**

8 **REQUEST FOR PRODUCTION NO. 18:**

9 All documents and/or communications regarding the rational, basis, or justification for  
10 the reduced rates for emergency services proposed to Fremont in or around 2017 to Present.

11 **RESPONSE:**

12 Subject to and without waiving Defendants' objections, including Defendants' specific  
13 objections to Plaintiff's Definitions, Instructions and Rules of Construction, Defendants state as  
14 follows: Defendants object to this Request on the basis that it is unduly burdensome and seeks  
15 information that is not proportional to the needs of the case. Fremont has asserted 15,210 claims  
16 where it alleges that Defendants did not reimburse Fremont for the full amount billed. To  
17 produce the documents related to why those claims were paid at a particulate rate, Defendants  
18 would, among other things, have to pull the administrative record for each of the 15,210  
19 individual CLAIMS, review the records for privileged/protected information and then produce  
20 them. As explained more fully in the burden declaration attached as Exhibit 1, this would be  
21 unduly burdensome as Defendants believe it will take 2 hours to pull each individual claim file  
22 for a total of 30,420 hours of employee labor.

23 Moreover, the request is overbroad, unduly burdensome, not reasonably particular, and  
24 not proportional to the needs of the case as it essentially requests all documents related to the  
25 parties' claims and defenses. It would be essentially impossible for Defendants to perform the  
26 investigation necessary to identify all documents and communications that in someway relate to  
27 the justification for the payments made on all of the 15,210 CLAIMS.

28 Responding further, subject to and without waiving Defendants' objections: please see

1 documents produced concurrently herewith as DEF010455-DEF010554.

2 **Responding further, subject to and without waiving Defendants' objections: please**  
3 **see documents produced concurrently herewith as DEF011276-DEF011279, DEF011295-**  
4 **DEF011410.**

5 **Defendants have made diligent efforts to respond to this Request, but reserve the**  
6 **right to supplement their response and objections.**

7 **REQUEST FOR PRODUCTION NO. 19:**

8 All documents regarding the Provider charges and/or reimbursement rates that You have  
9 paid to Participating or Non-Participating Providers from July 1, 2017, to the present in Nevada.  
10 Without waiving any right to seek further categories of documentation, at this juncture, Fremont  
11 is willing to accept, in lieu of contractual documents, data which is blinded or redacted and/or  
12 aggregated or summarized form.

13 **RESPONSE:**

14 Subject to and without waiving Defendants' objections, including Defendants' specific  
15 objections to Plaintiff's Definitions, Instructions and Rules of Construction, Defendants state as  
16 follows: Defendants object that, even with the limitation proposed by Fremont, this Request is  
17 overbroad, unduly burdensome and seeks irrelevant information that is not proportional to the  
18 needs of the case. It is unclear what the relevance is of documents showing what the amounts  
19 Defendants paid to providers other than Fremont. Depending on, for example, the provider, the  
20 claim at issue, and/or the applicable health benefits plan documents, Defendants use different  
21 methodologies to calculate the allowed amount of reimbursement. The documents sought in this  
22 Request are therefore not relevant to determining the usual and customary rate of reimbursement  
23 for the claims Fremont is asserting in this litigation.

24 To the extent this Request is also seeking documents related to the reimbursement rates  
25 for claims of Fremont as a Non-Participating Provider, Defendants object to this Request on the  
26 basis that it is unduly burdensome and seeks information that is not proportional to the needs of  
27 the case. Fremont has asserted 15,210 claims where it alleges that Defendants did not reimburse  
28 Fremont for the full amount billed. To produce the documents relating to the reimbursement



1 rates on those claims, Defendants would, among other things, have to pull the administrative  
2 record for each of the 15,210 individual CLAIMS, review the records for privileged/protected  
3 information and then produce them. As explained more fully in the burden declaration attached  
4 as Exhibit 1, this would be unduly burdensome as Defendants believe it will take 2 hours to pull  
5 each individual claim file for a total of 30,420 hours of employee labor.

6 Responding further, subject to and without waiving Defendants' objections: please see  
7 document produced concurrently herewith as DEF010558.

8 **Responding further, subject to and without waiving Defendants' objections: please**  
9 **see documents produced concurrently herewith as DEF011274–DEF011275.**

10 **Defendants have made diligent efforts to respond to this Request, but reserve the**  
11 **right to supplement their response and objections.**

12 **REQUEST FOR PRODUCTION NO. 20:**

13 All Documents relied on for the determination of the recommended rate of  
14 reimbursement for any CLAIM by Fremont for payment for services rendered to any Plan  
15 Member. This request includes, without limitation, all cost data, reimbursement data, and other  
16 data and Documents upon which such recommended rates are based.

17 **RESPONSE:**

18 Subject to and without waiving Defendants' objections, including Defendants' specific  
19 objections to Plaintiff's Definitions, Instructions and Rules of Construction, Defendants state as  
20 follows: Defendants object that the term "CLAIM" is vague, as noted in Defendants' objections  
21 to Plaintiff's Definitions, as the definition does not identify what specific list of claims it is  
22 referring to. However, Defendants interpret this Request as referring to the claims listed in  
23 FESM000011. Assuming those are the claims Fremont intended to refer to, Defendants object to  
24 this Request on the basis that it is unduly burdensome and seeks information that is not  
25 proportional to the needs of the case. Fremont has asserted 15,210 CLAIMS where it alleges that  
26 Defendants did not reimburse Fremont for the full amount billed. To produce the documents  
27 relied on to determine the amount of reimbursement to be issued on a CLAIM, Defendants  
28 would, among other things, have to pull the administrative record for each of the 15,210

1 individual CLAIMS, review the records for privileged/protected information and then produce  
2 them. As explained more fully in the burden declaration attached as Exhibit 1, this would be  
3 unduly burdensome as Defendants believe it will take 2 hours to pull each individual claim file  
4 for a total of 30,420 hours of employee labor.

5 Moreover, the request is overbroad, unduly burdensome, not reasonably particular, and  
6 not proportional to the needs of the case as it essentially requests all documents related to the  
7 parties' claims and defenses. It would be essentially impossible for Defendants to perform the  
8 investigation necessary to identify all documents and communications that in some way relate to  
9 the reimbursement issued to Fremont on all of the 15,210 CLAIMS.

10 Defendants request that Fremont meet and confer to narrow the scope of this request and  
11 provide some semblance of reasonable particularity with respect to the type of documents they  
12 are seeking so as to reduce the burden imposed on Defendants.

13 **Responding further, subject to and without waiving Defendants' objections: please**  
14 **see all contracts and evidence of contracts that Defendants believe were in place during the**  
15 **relevant period, including documents produced concurrently herewith as DEF011280–**  
16 **DEF011382, and DEF011411–DEF011479.**

17 **Defendants have made diligent efforts to respond to this Request, but reserve the**  
18 **right to supplement their response and objections.**

19 **REQUEST FOR PRODUCTION NO. 22:**

20 Produce any and all Documents and/or Communications relating to any analysis of the  
21 usual and customary provider charges for similar services in Nevada for Emergency Medicine  
22 Services.

23 **RESPONSE:**

24 Subject to and without waiving Defendants' objections, including Defendants' specific  
25 objections to Plaintiff's Definitions, Instructions and Rules of Construction, Defendants state as  
26 follows:

27 Defendants object that this Request is vague in regard to what type of "analysis" it is  
28 referring to and vague in regard to what "similar services" it is referring to. Defendants are thus



1 unable to determine whether they have documents that are responsive to this Request.  
2 Defendants further object that this Request appears to be overbroad, unduly burdensome and  
3 seeks information that is not relevant to Plaintiff's claims and not proportional to the needs of the  
4 case.

5 Defendants request that Plaintiff meet and confer to narrow the scope of this Request to  
6 ensure that it is not unduly burdensome to Defendants and that Plaintiff is able to get the  
7 information it is seeking.

8 **Responding further, subject to and without waiving Defendants' objections: please**  
9 **see documents produced concurrently herewith as DEF011274–DEF011279.**

10 **Defendants have made diligent efforts to respond to this Request, but reserve the**  
11 **right to supplement their response and objections.**

12 **REQUEST FOR PRODUCTION NO. 23:**

13 Produce any and all Documents and/or Communications relating to any analysis of any  
14 Nevada statutes or guidelines You currently use, or used during calendar or Plan years 2016,  
15 2017, 2018 and/or 2019, to determine and/or calculate Your reimbursement of Non-Participating  
16 Providers in Nevada for Emergency Medicine Services.

17 **RESPONSE:**

18 Subject to and without waiving Defendants' objections, including Defendants' specific  
19 objections to Plaintiff's Definitions, Instructions and Rules of Construction, Defendants state as  
20 follows: Defendants object that this Request is overbroad, unduly burdensome and seeks  
21 information that is not relevant to Plaintiff's claims and not proportional to the needs of the case.  
22 This improper Request seeks documents and communications relating to reimbursement  
23 calculations for all non-participating providers in Nevada rather than just Fremont. Defendants  
24 further object that this Request is vague in referring to "any Nevada statutes or guidelines" rather  
25 than to specific statutes. This vagueness, in turn, makes it unduly burdensome for Defendants to  
26 find responsive documents. Further, this Request appears to potentially call for information that  
27 is subject to the attorney-client and/or work product privileges as it is seeking analysis of Nevada  
28 statutes and guidelines. Defendants further object to the extend this Request seeks information

1 from prior to July 1, 2017, the date of the earliest claim submitted by Fremont, as such  
2 information is not relevant to Plaintiff's claims.

3 To the extent that Fremont intended this Request to refer to NRS 679B.152, Defendants  
4 incorporate by reference their responses to requests for production nos. 1 and 2.

5 Defendants request that Plaintiff meet and confer to narrow the scope of this Request to  
6 ensure that it is not unduly burdensome to Defendants and that Plaintiff is able to get the  
7 information it is seeking.

8 **By way of further response, to date, United has not identified any non-privileged**  
9 **documents responsive to this request. Responding further, United states that, for fully-**  
10 **insured plans, United typically must file its plan language with the Nevada Division of**  
11 **Insurance and receive approval for its out-of-network reimbursement methodologies.**  
12 **United is undertaking efforts to locate documents reflective of these filings.**

13 **REQUEST FOR PRODUCTION NO. 24:**

14 Produce any and all Documents and/or Communications relating to any analysis of  
15 Nevada statutes with regard to the payment of the CLAIMS.

16 **RESPONSE:**

17 Subject to and without waiving Defendants' objections, including Defendants' specific  
18 objections to Plaintiff's Definitions, Instructions and Rules of Construction, Defendants state as  
19 follows: Defendants object that the term "CLAIM" is vague, as noted in Defendants' objections  
20 to Plaintiff's Definitions, as the definition does not identify what specific list of claims it is  
21 referring to. However, Defendants interpret this Request as referring to the claims listed in  
22 FESM000011. Assuming those are the claims Plaintiff intended to refer to, Defendants object to  
23 this Request on the basis that it is unduly burdensome and seeks information that is not  
24 proportional to the needs of the case. Plaintiff has asserted 15,210 CLAIMS where it alleges that  
25 Defendants did not reimburse Fremont for the full amount billed. To produce the documents and  
26 communications relating to any legal analysis that impacted the amount paid on those CLAIMS  
27 (assuming such documents even exist), Defendants would, among other things, have to pull the  
28 administrative record for each of the 15,210 individual CLAIMS, review the records for

1 privileged/protected information and then produce them. As explained more fully in the burden  
2 declaration attached as Exhibit 1, this would be unduly burdensome as Defendants believe it will  
3 take 2 hours to pull each individual claim file for a total of 30,420 hours of employee labor.

4 Defendants further object that this Request is vague in referring to “Nevada statutes”  
5 rather than to specific statutes. This vagueness, in turn, makes the Request unduly burdensome  
6 for Defendants to find responsive documents. Further, this Request appears to potentially call  
7 for information that is subject to the attorney-client and/or work product privileges as it is  
8 seeking analysis of Nevada statutes.

9 Defendants request that Plaintiff meet and confer to narrow the scope of this Request to  
10 ensure that it is not unduly burdensome to Defendants and that Plaintiff is able to get the  
11 information it is seeking.

12 **By way of further response, to date, United has not identified any non-privileged**  
13 **documents responsive to this request. Responding further, United states that, for fully-**  
14 **insured plans, United typically must file its plan language with the Nevada Division of**  
15 **Insurance and receive approval for its out-of-network reimbursement methodologies.**  
16 **United is undertaking efforts to locate documents reflective of these filings.**

17 **REQUEST FOR PRODUCTION NO. 25:**

18 Produce all agreements between You and any Participating Providers in Nevada relating  
19 to the provision of Emergency Medicine Services to Plan Members.

20 **RESPONSE:**

21 Subject to and without waiving Defendants’ objections, including Defendants’ specific  
22 objections to Plaintiff’s Definitions, Instructions and Rules of Construction, Defendants state as  
23 follows:

24 Defendants object that this Request seeks information that is not relevant to Plaintiff’s  
25 claims and not proportional to the needs of the case. Fremont is a non-participating provider and  
26 thus Defendants’ contracts with participating providers are not relevant. Defendants further  
27 object that this Request is not limited to any specific time period.

28 Defendants also object that this Request improperly asks that they reveal information

1 about their agreements with other providers. Defendants' agreements with other providers  
2 typically contain confidentiality clauses such that producing these agreements could force  
3 Defendants to breach their obligations to these third parties. Moreover, the information sought is  
4 proprietary and subject to protection as a trade secret pursuant to NRS 600A.030(5) as this  
5 information has independent value due to, among other things, the fact that it is not known to  
6 other providers like Fremont.

7 **Responding further, subject to and without waiving Defendants' objections: please**  
8 **see documents produced concurrently herewith as DEF011280–DEF011382, and**  
9 **DEF011411–DEF011446. Defendants have made diligent efforts to respond to this**  
10 **Request, but reserve the right to supplement their response and objections.**

11 **REQUEST FOR PRODUCTION NO. 26:**

12 Produce any and all Documents and/or Communications regarding the provider charges  
13 and/or reimbursement rates that other insurers and/or payors have paid for Emergency Medicine  
14 Services in Nevada to either or both participating or non-participating providers from January 1,  
15 2016, to the present, including Documents and/or Communications containing any such data or  
16 information produced in a blinded or redacted form and/or aggregated or summarized form.

17 **RESPONSE:**

18 Subject to and without waiving Defendants' objections, including Defendants' specific  
19 objections to Plaintiff's Definitions, Instructions and Rules of Construction, Defendants state as  
20 follows:

21 Defendants object that this Request seeks information that is not within its possession,  
22 custody or control. To the extent Plaintiff believes this information would be within  
23 Defendants' possession, custody or control, Defendants request that Plaintiff clarify its Request.  
24 Defendants further object that this Request is overbroad and unduly burdensome as it appears to  
25 seek documents on all emergency medical services claims that have ever been paid by any  
26 insurer or payor in Nevada during the specified time frame. Thus, the Request likely covers  
27 hundreds of thousands of claims for payment and seeks information that is not proportional to  
28 the needs of this litigation. Defendants further object that this Request is overbroad and seeks

1 irrelevant information as it seeks information starting on July 1, 2016 but the earliest claim  
2 Plaintiff has asserted is dated July 1, 2017. Defendants further state that to the extent  
3 Defendants do have any responsive documents these document would likely be publicly  
4 available to Fremont as well.

5 **By way of further response, subject to and without waiving Defendants' objections,**  
6 **United does not receive rate information from other insurers and/or payors. However,**  
7 **United refers Plaintiffs to DEF011072, produced concurrently herewith.**

8 **REQUEST FOR PRODUCTION NO. 27:**

9 Produce any and All Documents and/or Communications concerning, evidencing, or  
10 relating to any negotiations or discussions concerning non-participating provider reimbursement  
11 rates between the UH Parties and Fremont, including negotiations or discussions leading up to  
12 any participation agreements or contracts with Fremont in effect prior to July 1, 2017.

13 **RESPONSE:**

14 Subject to and without waiving Defendants' objections, including Defendants' specific  
15 objections to Plaintiff's Definitions, Instructions and Rules of Construction, Defendants state as  
16 follows:

17 Defendants object to this Request to the extent that it seeks documents and  
18 communications from prior to July 1, 2017 as this portion of the Request seeks information that  
19 is not relevant to Fremont's claims and that is not proportional to the needs of the case.  
20 Defendants will not be providing documents that are responsive to this portion of the Request.

21 Moreover, all documents and communications exchanged between Defendants and  
22 Fremont would necessarily be possessed by Fremont. There is no justification for imposing the  
23 burden on Defendants to identify, collect, review, and produce such documents when Fremont  
24 already possesses the same.

25 Defendants have been unable to locate documents relating to rate negotiations between  
26 Fremont Emergency Services (MANDAVIA) Ltd. and the other Defendants but will supplement  
27 this response and produce same if any such documents are located.

28 **Responding further, subject to and without waiving Defendants' objections: please**

1 see documents produced concurrently herewith as DEF011447–DEF011479. Defendants  
2 have made diligent efforts to respond to this Request, but reserve the right to  
3 supplement their response and objections.

4 **REQUEST FOR PRODUCTION NO. 28:**

5 Produce any and All Documents and/or Communications concerning, evidencing, or  
6 relating to any negotiations or discussions concerning non-participating provider reimbursement  
7 rates between the Sierra Affiliates and Fremont, including negotiations or discussions leading up  
8 to any participation agreements or contracts with Fremont in effect prior to March 1, 2019.

9 **RESPONSE:**

10 Subject to and without waiving Defendants’ objections, including Defendants’ specific  
11 objections to Plaintiff’s Definitions, Instructions and Rules of Construction, Defendants state as  
12 follows:

13 Defendants object to this Request to the extent that it seeks documents and  
14 communications from prior to March 1, 2019 as this portion of the Request seeks information  
15 that is not relevant to Plaintiff’s claims and that is not proportional to the needs of the case.  
16 Defendants will not be providing documents that are responsive to this portion of the Request.

17 Moreover, all documents and communications exchanged between Defendants and  
18 Fremont would necessarily be possessed by Fremont. There is no justification for imposing the  
19 burden on Defendants to identify, collect, review, and produce such documents when Fremont  
20 already possesses the same.

21 Defendants further respond by referring Plaintiff to the following bates numbered  
22 documents produced with these responses: DEF000114 – DEF000156.

23 **Responding further, subject to and without waiving Defendants’ objections: please**  
24 **see documents produced concurrently herewith as DEF011276–DEF011279, DEF011295–**  
25 **DEF11410. Defendants have made diligent efforts to respond to this Request, but reserve**  
26 **the right to supplement their response and objections.**

27 **REQUEST FOR PRODUCTION NO. 31:**

28 Produce any and all documents and/or Communications regarding Your goals, thoughts,

1 discussions, considerations, and/or strategy regarding reimbursement rates and/or fee schedules  
2 for participating Emergency Medicine Groups and/or any hospitals or other providers of  
3 Emergency Department Services from January 1, 2015, through the present.

4 **RESPONSE:**

5 Subject to and without waiving Defendants' objections, including Defendants' specific  
6 objections to Plaintiff's Definitions, Instructions and Rules of Construction, Defendants state as  
7 follows:

8 Defendants object that this Request is overbroad, unduly burdensome and seeks  
9 information that is not relevant to Plaintiff's claims and not proportional to the needs of the case.  
10 This Request seeks a substantial amount of information regarding Defendants' negotiations,  
11 strategy, relationship, and rates of reimbursement to numerous non-parties which has no  
12 relevance to Plaintiff's claims. Defendants further object that this Request seeks irrelevant  
13 information to the extent this Request seeks information from prior to July 1, 2017 as Plaintiff is  
14 not asserting any claims for services prior to that date. Defendants further object that, as written,  
15 this Request is vague and it is unclear exactly what documents would be responsive to this  
16 Request. Defendants further object that, since this Request refers to Defendants' "goals."  
17 "thoughts," and "strategy," it may be seeking information that is protected by the attorney-client  
18 and/or attorney work product privileges.

19 Defendants also object that this Request improperly asks that they reveal information  
20 about their agreements with other providers. Defendants' agreements with other providers  
21 typically contain confidentiality clauses such that producing these agreements could force  
22 Defendants to breach their obligations to these third parties. Moreover, the information sought is  
23 proprietary and subject to protection as a trade secret pursuant to NRS 600A.030(5) as this  
24 information has independent value due to, among other things, the fact that it is not known to  
25 other providers like Fremont.

26 Responding further, subject to and without waiving Defendants' objections: please see  
27 documents produced concurrently herewith as DEF010455-DEF010554.

28 **Responding further, subject to and without waiving Defendants' objections: please**

1 see documents produced concurrently herewith as DEF10559–DEF011089. Defendants  
2 have made diligent efforts to respond to this Request, but reserve the right to  
3 supplement their response and objections.

4 **REQUEST FOR PRODUCTION NO. 32:**

5 Produce any and all Documents and/or Communications regarding Your goals, thoughts,  
6 discussions, considerations, and/or strategy regarding reimbursement rates and/or fee schedules  
7 for non-participating Emergency Medicine Groups and/or any hospitals or other providers of  
8 Emergency Department Services from January 1, 2016, through the present.

9 **RESPONSE:**

10 Subject to and without waiving Defendants’ objections, including Defendants’ specific  
11 objections to Plaintiff’s Definitions, Instructions and Rules of Construction, Defendants state as  
12 follows:

13 Defendants object that this Request is overbroad, unduly burdensome and seeks  
14 information that is not relevant to Plaintiff’s claims and not proportional to the needs of the case.  
15 This Request seeks a substantial amount of information regarding Defendants’ negotiations,  
16 strategy, relationship, and rates of reimbursement to numerous non-parties which has no  
17 relevance to Plaintiff’s claims. Defendants further object that this Request seeks irrelevant  
18 information to the extent this Request seeks information from prior to July 1, 2017 as Fremont is  
19 not asserting any claims for services prior to that date. Defendants further object that, as written,  
20 this Request is vague and it is unclear exactly what documents would be responsive to this  
21 Request. Defendants further object that, since this Request refers to Defendants’ “goals,”  
22 “thoughts,” and “strategy,” it may be seeking information that is protected by the attorney-client  
23 and/or attorney work product privileges.

24 Defendants also object that this Request improperly asks that they reveal information  
25 about their agreements with other providers. Defendants’ agreements with other providers  
26 typically contain confidentiality clauses such that producing these agreements could force  
27 Defendants to breach their obligations to these third parties. Moreover, the information sought is  
28 proprietary and subject to protection as a trade secret pursuant to NRS 600A.030(5) as this



1 information has independent value due to, among other things, the fact that it is not known to  
2 other providers like Fremont.

3 Responding further, subject to and without waiving Defendants' objections: please see  
4 documents produced concurrently herewith as DEF010455-DEF010554.

5 **Responding further, subject to and without waiving Defendants' objections: please**  
6 **see documents produced concurrently herewith as DEF10559–DEF011089. Defendants**  
7 **have made diligent efforts to respond to this Request, but reserve the right to**  
8 **supplement their response and objections.**

9 **REQUEST FOR PRODUCTION NO. 33:**

10 Produce any and all Documents and/or Communications regarding Your reimbursement  
11 rates paid or to be paid to out-of-network Emergency Medicine Groups and/or Complaints about  
12 Your level of payment for Emergency Medicine Services and/or Emergency Department  
13 Services received from out-of-network providers.

14 **RESPONSE:**

15 Subject to and without waiving Defendants' objections, including Defendants' specific  
16 objections to Plaintiff's Definitions, Instructions and Rules of Construction, Defendants state as  
17 follows:

18 Defendants object that this Request is overbroad, unduly burdensome and seeks  
19 information that is not relevant to Plaintiff's claims and not proportional to the needs of the case.  
20 This Request seeks a substantial amount of information regarding Defendants' rates of  
21 reimbursement to numerous non-parties which has no relevance to Plaintiff's claims.  
22 Defendants further object that this Request is overbroad since it is not limited to any specific  
23 time period. The term "Complaints" is also vague and overbroad, as noted in Defendants'  
24 objections to Plaintiff's Definitions. Indeed, as written, this Request appears to call for  
25 Defendants to produce any communication from any out of network provider to Defendants  
26 where the provider complains in any way about payment, regardless of when that communication  
27 was sent. There are likely hundreds of thousands if not millions of documents that could be  
28 responsive to this Request.

1 Defendants also object that this Request improperly asks that they reveal information  
2 about their agreements with other providers. Defendants' agreements with other providers  
3 typically contain confidentiality clauses such that producing these agreements could force  
4 Defendants to breach their obligations to these third parties. Moreover, the information sought is  
5 proprietary and subject to protection as a trade secret pursuant to NRS 600A.030(5) as this  
6 information has independent value due to, among other things, the fact that it is not known to  
7 other providers like Fremont.

8 Responding further, subject to and without waiving Defendants' objections: please see  
9 document produced concurrently herewith as DEF010558.

10 **Responding further, subject to and without waiving Defendants' objections: please**  
11 **see documents produced concurrently herewith as DEF011211, and DEF011274–**  
12 **DEF011275. Defendants have made diligent efforts to respond to this Request, but**  
13 **reserve the right to supplement their response and objections.**

14 **REQUEST FOR PRODUCTION NO. 34:**

15 Produce any and all Documents and/or Communications regarding the impact, if any, that  
16 reimbursement rates paid by You to non-participating providers have had on profits You earned  
17 and/or premiums You charged with respect to one or more of Your commercial health plans  
18 offered in the State of Nevada from 2016 to the present.

19 **RESPONSE:**

20 Subject to and without waiving Defendants' objections, including Defendants' specific  
21 objections to Plaintiff's Definitions, Instructions and Rules of Construction, Defendants state as  
22 follows:

23 Defendants object that this Request is overbroad, unduly burdensome and seeks  
24 information that is not relevant to Plaintiff's claims and not proportional to the needs of the case.  
25 This Request is overbroad in that it is not limited to the impact of reimbursement rates paid to  
26 Fremont on Defendants profits but rather includes numerous non-party non-participating  
27 providers. This Request also seeks irrelevant information as the impact of reimbursement rates  
28 to numerous non-parties (or to Plaintiff for that matter) on Defendants' profits has no bearing on

1 whether or not Fremont was reimbursed at the appropriate rate for the services it provided to  
2 Defendants' plan members. This Request is also overbroad and seeks irrelevant information to  
3 the extent it seeks information from prior to July 1, 2017, which is the date of the earliest claim  
4 asserted by Plaintiff in this litigation.

5 In addition, this Request is objectionable as it infringes on Defendants' privacy interests  
6 and seeks proprietary and confidential business information that the Defendants are entitled to  
7 shield from disclosure. *Ranney-Brown Distributors, Inc. v. E. T. Barwick Indus., Inc.*, 75 F.R.D.  
8 3, 5 (S.D. Ohio 1977) ("Ordinarily, Rule 26 will not permit the discovery of facts concerning a  
9 defendant's financial status, or ability to satisfy a judgment, since such matters are not relevant,  
10 and cannot lead to the discovery of admissible evidence."); *U.S. for the Use and Benefit of P.W.*  
11 *Berry Co. v. Gen. Elec. Co.*, 158 F.R.D. 161, 164 (D.Or.1994) (granting motion for protective  
12 order in a breach of contract action, precluding discovery of corporate and individual financial  
13 information including tax returns and financial statements, because that information was not  
14 relevant within the meaning of Rule 26(b)(1)) when the core of the parties' dispute was over  
15 whether or not the plaintiff had been adequately compensated for the work it performed).

16 Moreover, this information is subject to protection as a trade secret pursuant to NRS  
17 600A.030(5) as this information has independent value due to, among other things, the fact that it  
18 is not known to other providers like Fremont.

19 **Responding further, to date, United has not located documents responsive to this**  
20 **request. United's efforts to identify such documents, if any exist, are continuing.**

21 **REQUEST FOR PRODUCTION NO. 35:**

22 Produce any and all Documents and/or Communications regarding Your reimbursement  
23 policies for non-participating providers considered or adopted, effective January 1, 2016, to the  
24 present.

25 **RESPONSE:**

26 Subject to and without waiving Defendants' objections, including Defendants' specific  
27 objections to Plaintiff's Definitions, Instructions and Rules of Construction, Defendants state as  
28 follows:

1 Defendants object that this Request is overbroad and seeks information that is not  
2 relevant and not proportional to the needs of the case. This Request is overbroad in that it seeks  
3 reimbursement policies for all non-participating providers rather than just those that would apply  
4 to Plaintiff. It is also overbroad in that it seeks documents from prior to July 1, 2017, which is  
5 the date of the earliest claim asserted by Plaintiff.

6 Defendants also object that the term “reimbursement policies” is unreasonably vague and  
7 could arguably apply to numerous irrelevant documents. In general, the amounts paid to non-  
8 participating providers are based on the terms of the applicable health benefits plan documents. It  
9 is unclear if these are the documents Fremont is seeking or if Fremont is seeking something else.  
10 Defendants request that Plaintiff meet and confer to narrow the scope of this Request to ensure  
11 that it is not unduly burdensome to Defendants and that Plaintiff is able to get the information it  
12 is seeking.

13 **Responding further, subject to and without waiving Defendants’ objections: please**  
14 **see documents previously produced as DEF001536–DEF010454, and documents**  
15 **forthcoming, beginning at DEF011481. Defendants have made diligent efforts to respond**  
16 **to the Requests, but reserve the right to supplement their responses and objections.**

17 **REQUEST FOR PRODUCTION NO. 36:**

18 Produce any and all Documents and/or Communications regarding or reflecting the  
19 average or typical rate of payment, or an aggregation, summary or synopsis of those payments,  
20 that You allowed from January 1, 2016, to the present for all or any portion of the Emergency  
21 Medicine Services and/or Emergency Department Services rendered to Your Plan Members  
22 covered under any plan You offer in Nevada.

23 **RESPONSE:**

24 Subject to and without waiving Defendants’ objections, including Defendants’ specific  
25 objections to Plaintiff’s Definitions, Instructions and Rules of Construction, Defendants state as  
26 follows:

27 Defendants object that this Request is overbroad, unduly burdensome and seeks  
28 information that is not relevant to Plaintiff’s claims and not proportional to the needs of the case.

1 This Request seeks a substantial amount of information regarding Defendants' rates of payment  
2 to numerous non-parties which has no relevance to Plaintiff's claims. Defendants further object  
3 that this Request is overbroad since it seeks documents from prior to July 1, 2017, which is the  
4 date of the earliest claim asserted by Plaintiff. Indeed, as written, this Request calls for the  
5 production of documents and communications relating to "any plan" the Defendants have offered  
6 in Nevada in the last four years, regardless of whether Fremont ever treated any of those plan  
7 members. There are likely hundreds of thousands if not millions of documents that could be  
8 responsive to this Request.

9 Defendants also object that this Request improperly asks that they reveal information  
10 about their payments to other providers. Defendants' agreements with other providers typically  
11 contain confidentiality clauses such that producing this information could force Defendants to  
12 breach their obligations to these third parties. Moreover, the information sought is proprietary  
13 and subject to protection as a trade secret pursuant to NRS 600A.030(5) as this information has  
14 independent value due to, among other things, the fact that it is not known to other providers like  
15 Fremont.

16 **Responding further, subject to and without waiving Defendants' objections: please**  
17 **see documents produced concurrently herewith as DEF011274–DEF011275.**

18 **Defendants have made diligent efforts to respond to this Request, but reserve the**  
19 **right to supplement their response and objections.**

20 **REQUEST FOR PRODUCTION NO. 38:**

21 Produce any and all Documents and/or Communications concerning Your adjudication  
22 and/or payment of each claim for Emergency Medicine Services and/or Emergency Department  
23 Services that either participating or non-participating Emergency Medical Groups and/or any  
24 hospitals or other providers of Emergency Department Services other than Fremont submitted to  
25 You for payment between January 1, 2016, and the present.

26 **RESPONSE:**

27 Subject to and without waiving Defendants' objections, including Defendants' specific  
28 objections to Plaintiff's Definitions, Instructions and Rules of Construction, Defendants state as

1 follows:

2 Defendants object that this Request is overbroad, unduly burdensome and seeks  
3 information that is not relevant to Plaintiff's claims and not proportional to the needs of the case.  
4 This Request seeks a substantial amount of information regarding Defendants' payments on non-  
5 party claims which have no relevance to Plaintiff's claims. Defendants further object that this  
6 Request is overbroad since it seeks documents from prior to July 1, 2017, which is the date of the  
7 earliest claim asserted by Plaintiff. There are likely hundreds of thousands of documents that  
8 could be responsive to this Request.

9 Defendants also object that this Request improperly asks that they reveal information  
10 about their payments to other providers. Defendants' agreements with other providers typically  
11 contain confidentiality clauses such that producing this information could force Defendants to  
12 breach their obligations to these third parties. Moreover, the information sought is proprietary  
13 and subject to protection as a trade secret pursuant to NRS 600A.030(5) as this information has  
14 independent value due to, among other things, the fact that it is not known to other providers like  
15 Fremont.

16 Responding further, subject to and without waiving Defendants' objections: please see  
17 document produced concurrently herewith as DEF010558.

18 **Responding further, subject to and without waiving Defendants' objections: please**  
19 **see documents produced concurrently herewith as DEF011274–DEF011275.**

20 **Defendants have made diligent efforts to respond to this Request, but reserve the**  
21 **right to supplement their response and objections.**

22 **REQUEST FOR PRODUCTION NO. 41:**

23 Produce any and all Documents and/or Communications regarding any challenges by any  
24 other non-participating Emergency Medicine Group and/or any non-participating hospital or  
25 other non-participating provider of Emergency Department Services of the appropriateness of the  
26 reimbursement rates paid by You for Emergency Medicine Services and/or Emergency  
27 Department Services rendered to Your Plan Members from January 1, 2016, to the present.

28 ///

1 **RESPONSE:**

2 Subject to and without waiving Defendants' objections, including Defendants' specific  
3 objections to Plaintiff's Definitions, Instructions and Rules of Construction, Defendants state as  
4 follows:

5 Defendants object that this Request is overbroad, unduly burdensome and seeks  
6 information that is not relevant to Plaintiff's claims and not proportional to the needs of the case.  
7 This Request seeks "all documents and/or communications" relating to challenges by non-parties  
8 to Defendants' rates of reimbursement. Such information has no relevance to Plaintiff's claims.  
9 Defendants further object that this Request is overbroad since it seeks information from prior to  
10 July 1, 2017, the date of the earliest claim asserted by Plaintiff. The term "challenges" is also  
11 vague and overbroad in that it is unclear what type of challenges are intended to be encompassed  
12 by it (i.e. legal complaint, administrative appeals, other types of "challenges," etc.). Indeed, as  
13 written, this Request could be read to call for Defendants to produce any communication from  
14 any out of network provider to Defendants where the provider complains in any way about  
15 payment.

16 **Responding further, subject to and without waiving Defendants' objections: please**  
17 **see document produced concurrently herewith as DEF011211.**

18 **Defendants have made diligent efforts to respond to this Request, but reserve the**  
19 **right to supplement their response and objections.**

20 **REQUEST FOR PRODUCTION NO. 42:**

21 Produce any and all Documents and/or Communications regarding, discussing, or  
22 referring to any failure by You to attempt to effectuate a prompt, fair, and/or equitable settlement  
23 of any CLAIMS.

24 **RESPONSE:**

25 Subject to and without waiving Defendants' objections, including Defendants' specific  
26 objections to Plaintiff's Definitions, Instructions and Rules of Construction, Defendants state as  
27 follows:

28 Defendants object that the phrase "attempt to effectuate a prompt, fair, and/or equitable

1 settlement of any CLAIMS” is vague as it is unclear exactly what type of failure by Defendants  
2 would make a document and/or communication responsive.

3 Defendants further object that the term “CLAIM” is vague, as noted in Defendants’  
4 objections to Plaintiff’s Definitions, as the definition does not identify what specific list of  
5 claims it is referring to. However, Defendants interpret this Request as referring to the claims  
6 listed in FESM000011. Assuming those are the claims Plaintiff intended to refer to, Defendants  
7 object to this Request on the basis that it is unduly burdensome and seeks information that is not  
8 proportional to the needs of the case. Plaintiff has asserted 15,210 CLAIMS where it alleges that  
9 Defendants did not reimburse Fremont for the full amount billed. To produce the documents and  
10 communications relating to any legal analysis that impacted the amount paid on those CLAIMS  
11 (assuming such documents even exist), Defendants would, among other things, have to pull the  
12 administrative record for each of the 15,210 individual CLAIMS, review the records for  
13 privileged/protected information and then produce them. As explained more fully in the burden  
14 declaration attached as Exhibit 1, this would be unduly burdensome as Defendants believe it will  
15 take 2 hours to pull each individual claim file for a total of 30,420 hours of employee labor.

16 Defendants request that Plaintiff meet and confer to narrow the scope of this Request to  
17 ensure that it is not unduly burdensome to Defendants and that Plaintiff is able to get the  
18 information it is seeking.

19 **Responding further, United does not agree that it has failed to effectuate a prompt,**  
20 **fair, and/or equitable settlement of the at-issue claims, and thus has no documents**  
21 **responsive to this Request.**

22 **REQUEST FOR PRODUCTION NO. 43:**

23 Produce any and all Documents and/or Communications suggesting that Medicare  
24 reimbursement rate for any Emergency Medicine Services is not a measure of either fair market  
25 value or the usual and customary rate for such services.

26 **RESPONSE:**

27 Subject to and without waiving Defendants’ objections, including Defendants’ specific  
28 objections to Plaintiff’s Definitions, Instructions and Rules of Construction, Defendants state as



1 follows:

2 Defendants object that this Request is vague, overbroad, and, by extension, unduly  
3 burdensome. Defendants are uncertain what is meant by the phrase “suggesting that Medicare  
4 reimbursement rate . . . is not a measure of either fair market value or the usual and customary  
5 rate for such services” and request that Plaintiff clarify exactly what type of documents and  
6 communications it is seeking.

7 This Request is overbroad and unduly burdensome in that it is not limited to  
8 communications from any particular person or entity and is not limited in time frame. As  
9 written, the Request would require the Defendants to essentially search all their records and  
10 databases all over the country for any comments relating to “Medicare,” “fair market value” and  
11 “usual and customary.”

12 Defendants request that Plaintiff meet and confer to narrow the scope of this Request to  
13 ensure that it is not unduly burdensome to Defendants and that Plaintiff is able to get the  
14 information it is seeking.

15 **By way of further response, United does not agree with Plaintiffs’ argumentative**  
16 **statement that “Medicare reimbursement rate for any Emergency Medicine Services is**  
17 **not a measure of either fair market value of the usual and customary rate for services.”**  
18 **Furthermore, to date United has found no documents establishing that United holds that**  
19 **view that “Medicare reimbursement rate for any Emergency Medicine Services is not a**  
20 **measure of either fair market value of the usual and customary rate for services.”**

21 Dated this 30th day of October, 2020.

22 /s/ Brittany M. Llewellyn,  
23 D. Lee Roberts, Jr., Esq.  
24 Colby L. Balkenbush, Esq.  
25 Brittany M. Llewellyn, Esq.  
26 WEINBERG, WHEELER, HUDGINS,  
27 GUNN & DIAL, LLC  
28 6385 South Rainbow Blvd., Suite 400  
Las Vegas, Nevada 89118  
Telephone: (702) 938-3838  
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*Attorneys for Defendants*



**CERTIFICATE OF SERVICE**

I hereby certify that on the 30th day of October, 2020, a true and correct copy of the foregoing **DEFENDANTS' NINTH SUPPLEMENTAL RESPONSES TO FREMONT EMERGENCY SERVICES (MANDAVIA) LTD.'S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS** was electronically served on counsel through the Court's electronic service system pursuant to Administrative Order 14-2 and N.E.F.C.R. 9, via the electronic mail addresses noted below, unless service by another method is stated or noted:

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# **EXHIBIT 3**

**(FILED UNDER SEAL)**

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# **EXHIBIT 3**

035860

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# EXHIBIT 4

ELECTRONICALLY SERVED  
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*Attorneys for Defendants***DISTRICT COURT****CLARK COUNTY, NEVADA**

FREMONT EMERGENCY SERVICES  
(MANDAVIA), LTD., a Nevada professional  
corporation; TEAM PHYSICIANS OF NEVADA-  
MANDAVIA, P.C., a Nevada professional  
corporation; CRUM, STEFANKO AND JONES,  
LTD. dba RUBY CREST EMERGENCY  
MEDICINE, a Nevada professional corporation,

Plaintiffs,

vs.

UNITEDHEALTH GROUP, INC., a Delaware  
corporation; UNITED HEALTHCARE  
INSURANCE COMPANY, a Connecticut  
corporation; UNITED HEALTH CARE  
SERVICES INC., dba UNITEDHEALTHCARE, a  
Minnesota corporation; UMR, INC., dba UNITED  
MEDICAL RESOURCES, a Delaware  
corporation; OXFORD HEALTH PLANS, INC., a  
Delaware corporation; SIERRA HEALTH AND  
LIFE INSURANCE COMPANY, INC., a Nevada  
corporation; SIERRA HEALTH-CARE OPTIONS,  
INC., a Nevada corporation; HEALTH PLAN OF  
NEVADA, INC., a Nevada corporation; DOES 1-  
10; ROE ENTITIES 11-20,

Defendants.

Case No.: A-19-792978-B

Dept. No.: 27

**DEFENDANTS' TWENTY-SEVENTH  
SUPPLEMENT TO INITIAL  
DISCLOSURE OF WITNESSES AND  
DOCUMENTS**



Defendants UnitedHealth Group, Inc., UnitedHealthcare Insurance Company ("UHIC"), United HealthCare Services, Inc., UMR, Inc., Oxford Health Plans LLC, (incorrectly named as Oxford Health Plans, Inc.), Sierra Health and Life Insurance Co., Inc., Sierra Health-Care Options, Inc., and Health Plan of Nevada, Inc. (collectively, "Defendants") hereby submit the following Supplemental Disclosures with regard to the above captioned matter (supplemental information in **bold**).

### I. LIST OF WITNESSES

1. Kent Bristow, Senior Vice President  
TeamHealth Holdings, Inc.  
c/o McDonald Carano LLP  
2300 W. Sahara Ave., Suite 1200  
Las Vegas, Nevada 89102

This witness is expected to testify regarding the facts and circumstances surrounding the subject litigation and any related matters.

2. Jennifer Shrader, Vice President of Managed Care Contracting  
TeamHealth Holdings, Inc.  
c/o McDonald Carano LLP  
2300 W. Sahara Ave., Suite 1200  
Las Vegas, Nevada 89102

This witness is expected to testify regarding the facts and circumstances surrounding the subject litigation and any related matters.

3. Rena Harris, Senior Contracts Manager  
TeamHealth Holdings, Inc.  
c/o McDonald Carano LLP  
2300 W. Sahara Ave., Suite 1200  
Las Vegas, Nevada 89102

This witness is expected to testify regarding the facts and circumstances surrounding the subject litigation and any related matters.

4. Mark Kline, former employee / Vice President of Managed Care  
TeamHealth Holdings, Inc.  
c/o McDonald Carano LLP  
2300 W. Sahara Ave., Suite 1200  
Las Vegas, Nevada 89102

This witness is expected to testify regarding the facts and circumstances surrounding the subject litigation and any related matters.

- 1 5. Angie Nierman, National Vice President of Contracting and Strategy,  
2 UnitedHealthcare  
3 c/o WEINBERG, WHEELER, HUDGINS, GUNN & DIAL, LLC  
4 6385 S. Rainbow Blvd., Suite 400  
5 Las Vegas, NV 89118

6 This witness is expected to testify regarding the facts and circumstances surrounding  
7 the subject litigation and any related matters.

- 8 6. Rebecca Paradise, Vice President, Out-Of-Network Payment Strategy,  
9 UnitedHealthcare  
10 c/o WEINBERG, WHEELER, HUDGINS, GUNN & DIAL, LLC  
11 6385 S. Rainbow Blvd., Suite 400  
12 Las Vegas, NV 89118

13 This witness is expected to testify regarding the facts and circumstances surrounding  
14 the subject litigation and any related matters.

- 15 7. Paul Bevilacqua, Vice President Managed Care,  
16 TeamHealth Holdings, Inc.  
17 c/o McDonald Carano LLP  
18 2300 W. Sahara Ave., Suite 1200  
19 Las Vegas, Nevada 89102

20 This witness is expected to testify regarding the facts and circumstances surrounding  
21 the subject litigation and any related matters.

- 22 8. Jacy Jefferson, Director, Network Contracting,  
23 UnitedHealthcare  
24 c/o WEINBERG, WHEELER, HUDGINS, GUNN & DIAL, LLC  
25 6385 S. Rainbow Blvd., Suite 400  
26 Las Vegas, NV 89118

27 This witness is expected to testify regarding the facts and circumstances surrounding  
28 the subject litigation and any related matters.

9. Paula Dearolf, Executive Vice President, Revenue Cycle Operations  
TeamHealth Holdings, Inc.  
c/o McDonald Carano LLP  
2300 W. Sahara Ave., Suite 1200  
Las Vegas, Nevada 89102

This witness is expected to testify regarding the facts and circumstances surrounding  
the subject litigation and any related matters.

10. John Haben, Vice President, Network Contracting  
UnitedHealthcare  
c/o WEINBERG, WHEELER, HUDGINS, GUNN & DIAL, LLC  
6385 S. Rainbow Blvd., Suite 400  
Las Vegas, NV 89118



1 This witness is expected to testify regarding the facts and circumstances surrounding  
2 the subject litigation and any related matters.

- 3 11. Charles Sims, Network Contracting,  
4 Former employee of UnitedHealthcare  
5 TBD

6 This witness is expected to testify regarding the facts and circumstances surrounding  
7 the subject litigation and any related matters.

- 8 12. Jason Schoonover, Business Process Manager,  
9 UnitedHealthcare  
10 c/o WEINBERG, WHEELER, HUDGINS, GUNN & DIAL, LLC  
11 6385 S. Rainbow Blvd., Suite 400  
12 Las Vegas, NV 89118

13 This witness is expected to testify regarding the facts and circumstances surrounding  
14 the subject litigation and any related matters.

- 15 13. Jolene Bradley, Associate Director, Network Programs  
16 UnitedHealthcare  
17 c/o WEINBERG, WHEELER, HUDGINS, GUNN & DIAL, LLC  
18 6385 S. Rainbow Blvd., Suite 400  
19 Las Vegas, NV 89118

20 This witness is expected to testify regarding the facts and circumstances surrounding  
21 the subject litigation and any related matters.

- 22 14. Vice President, Network Pricing  
23 UnitedHealthcare  
24 c/o WEINBERG, WHEELER, HUDGINS, GUNN & DIAL, LLC  
25 6385 S. Rainbow Blvd., Suite 400  
26 Las Vegas, NV 89118

27 This witness is expected to testify regarding the facts and circumstances surrounding  
28 the subject litigation and any related matters.

15. Lisa Dealy, Special Investigations Unit, Customer Care and Ledger Billing for  
UnitedHealthcare Student Resources  
c/o WEINBERG, WHEELER, HUDGINS, GUNN & DIAL, LLC  
6385 S. Rainbow Blvd., Suite 400  
Las Vegas, NV 89118

This witness is expected to testify regarding the facts and circumstances surrounding  
the subject litigation and any related matters.

///



16. Scott Ziemer, Vice President, Customer Solutions  
 UMR  
 c/o WEINBERG, WHEELER, HUDGINS, GUNN & DIAL, LLC  
 6385 S. Rainbow Blvd., Suite 400  
 Las Vegas, NV 89118

This witness is expected to testify regarding the facts and circumstances surrounding the subject litigation and any related matters.

Any and all witnesses identified by the Plaintiff or any other party in this matter.

Defendants reserve the right to supplement this witness list as discovery continues, and hereby incorporate the witness list submitted by any other party to this matter solely for the purpose of identifying individuals likely to have discoverable information. The inclusion of a witness herein is not a concession that the witness will be called at trial, or that the witness has relevant information. The witnesses disclosed herein are listed solely for the purpose of identifying individuals which may potentially have discoverable information.

## II. LIST OF DOCUMENTS

Bates Start	Bates End	Document Description
DEF000001	DEF000003	Decl of Jane Stalinski in support of motion to dismiss
DEF000004	DEF000006	Decl of Maryann Britto In Support of Motion to Dismiss
DEF000007	DEF000009	Decl of Shawna Reed in support of Motion to Dismiss
DEF000010	DEF000012	Decl of Ellen Sinclair in Support of Motion to Dismiss
DEF000013	DEF000015	Decl of Jane Stalinski in support of Opps to Mtn to Remand
DEF000016	DEF000018	Decl of Maryann Britto in support of Def Opps to Mtn to Remand
DEF000019	DEF000021	Decl Shawn Reed in Support of Def Opps to Mtn to Remand
DEF000022	DEF000024	Decl Ellen Sinclair in support of Def Opps to Mtn to Remand
DEF000025	DEF000069	Sample claims forms for Fremont claims
DEF000070	DEF000108	Sample claims forms for SHO

Bates Start	Bates End	Document Description
DEF000109	DEF000113	Article in NV Independent
DEF000114	DEF000114	Fremont ER SHL Amendment
DEF000115	DEF000122	Fremont Medicaid Amendment
DEF000123	DEF000124	Fremont Responses to 07/14/2018 Term
DEF000125	DEF000127	Fremont Responses to 08/30/18 term
DEF000128	DEF000136	HPN Amendment
DEF000137	DEF000139	HPN response to 08/30 Fremont Term
DEF000140	DEF000141	January 2018 Term HPN Response
DEF000142	DEF000144	July 14/2018 Term
DEF000145	DEF000153	Sierra Response to Fremont Term
DEF000154	DEF000156	SHO Amendment
DEF000157	DEF000418	2019 UHC Care Provider Admin Guide
DEF000419	DEF000687	2020 UHC Care Provider Admin Guide
DEF000688	DEF000688	Policy for Out of Network Providers
DEF000689	DEF000700	Emergency Health Care Services
DEF000701	DEF000711	Emergency and Urgently needed health Care Services
DEF000712	DEF000714	Hospital Notifications
DEF000715	DEF000721	Information on payment of out of network benefits
DEF000722	DEF000787	Network Access Agreement
DEF000788	DEF000821	Amendment to Network Access Agreement
DEF000822	DEF000836	Amendment to Network Access Agreement
DEF000837	DEF000854	Amendment to Network Access Agreement
DEF000855	DEF001379	Out of Network information
DEF001380	DEF001387	Data iSight Client Preferences

Bates Start	Bates End	Document Description
DEF001388	DEF001421	Amendment to Network Access Agreement - unredacted <sup>1</sup>
DEF001422	DEF001436	Amendment to Network Access Agreement - unredacted
DEF001437	DEF001502	Network Access Agreement - unredacted
DEF001503	DEF001520	Amendment to Network Access Agreement - unredacted
DEF001521	DEF001535	Amendment to Network Access Agreement
DEF001536	DEF003358	Administrative records for at-issue claims*
DEF003359	DEF010454	Administrative records for at issue claims*
DEF010455	DEF010554	Documents regarding Defendants' out of network and in-network reimbursement rates and implementation, Documents regarding Defendants' relationship with third-party vendors*
DEF010555	DEF010555	Closure Reports*
DEF010556	DEF010557	Non Disclosure Agreement (previously provided to counsel via email 10/26/2020)
DEF010558	DEF010558	Aggregated market data*
DEF010559	DEF011089	Negotiation Correspondence
DEF011090	DEF011139	UHC-First Health Agreement
DEF011140	DEF011210	UMR-First Health Agreement and Amendments
DEF011211	DEF011211	Data iSight Dispute Report / Performance Report
DEF011212	DEF011237	OON Program PowerPoint
DEF011238	DEF011273	OON Program PowerPoint

**\*NOTE:** These documents are provided via separate email / Sharefile. Certain of the documents produced have been designated "CONFIDENTIAL - PROTECTED HEALTH INFORMATION" in accordance with the Health Insurance Portability and Accountability Act of 1996 ("HIPAA") and the relevant regulations promulgated thereunder at 45 C.F.R. parts 160 and 164. See 45 C.F.R. § 160.103 (defining "individually identifiable health information" and "protected health information").

Bates Start	Bates End	Document Description
DEF011274	DEF011274	Sierra Aggregated Market Data Report
DEF011275	DEF011275	UNET Aggregated Market Data Report
DEF011276	DEF011277	Fremont-TeamHealth Analysis - REDACTED
DEF011278	DEF011279	Fremont-TeamHealth Analysis - REDACTED
DEF011280	DEF011293	MGM NV-Fremont Agreement
DEF011294	DEF011294	MGM NV-Fremont Termination Extension
DEF011295	DEF011321	Fremont-Sierra SHO Agreement
DEF011322	DEF011323	Fremont-Sierra Amendment
DEF011324	DEF011338	Fremont-Sierra Agreement
DEF011339	DEF011356	Fremont-Sierra Medicaid Agreement
DEF011357	DEF011376	Fremont-Sierra SHL Agreement
DEF011377	DEF011379	Fremont-Sierra HPN Amendment
DEF011380	DEF011382	Fremont-Sierra SHO Amendment
DEF011383	DEF011384	Fremont-Sierra Termination Correspondence
DEF011385	DEF011393	Fremont-Sierra Termination Correspondence
DEF011394	DEF011396	Fremont-Sierra SHL Amendment
DEF011397	DEF011399	Fremont-Sierra Termination Correspondence
DEF011400	DEF011401	Fremont-Sierra Termination Correspondence
DEF011402	DEF011410	Fremont-Sierra Termination Correspondence
DEF011411	DEF011436	Fremont-UHC Agreement
DEF011437	DEF011446	Fremont-UHC Amendment
DEF011447	DEF011456	Email Message "Re: release Fremont ER claims!"
DEF011457	DEF011471	Email Message "Fremont Emergency Contract"
DEF011472	DEF011476	Email Message "RE EXTERNAL RE RE Contract"

Bates Start	Bates End	Document Description
DEF011477	DEF011479	Email Message "RE LVSC Freemont ER"
DEF011480	DEF011480	Claims Matching Detail <sup>2</sup>
DEF011481	DEF028026	Administrative records for at issue claims*
DEF028027	DEF030189	Benefit Plan Templates for Fully-Insured Clients Submitted to Nevada Division of Insurance for Approval
DEF030190	DEF030211	Health Plan of Nevada, Inc. Consulting Provider Agreement
DEF030212	DEF030230	Sierra Health & Life Insurance Company, Inc. Amendment to Individual / Group Provider Agreement
DEF030231	DEF030249	Sierra Health & Life Options, Inc. Amendment to Individual / Group Provider Agreement
DEF030250	DEF030252	Email Message and Attachments re: "Fremont Emergency Services"
DEF030253	DEF030262	Southern Nevada: Sierra Healthcare Options: Fremont Emergency Services
DEF030263	DEF030293	Customer Services Agreement Between Private Healthcare systems, Inc. and Fiserv Health Plan Administrators
DEF030294	DEF030299	First Amendment to the Customer Services Agreement between Fiserv Health Plan Administrators and Private Healthcare Systems, Inc.
DEF030300	DEF030300	Amendment between Fiserv Health Plan Administrators and Private Healthcare Systems, Inc.
DEF030301	DEF030406	Provider Appeals
DEF030407	DEF030431	Data iSight Appeals / Performance Reports
DEF030432	DEF045750	Administrative records for at issue claims*
DEF045751	DEF045751	Excel version of DEF010558*
DEF045752	DEF045752	Excel version of DEF011274*

<sup>2</sup> Although Defendants' efforts to perform a claims matching analysis are continuing, Defendants provide this Claim Matching Detail in a good faith effort to assist Plaintiffs in considering their claims matching counter-proposal.

Bates Start	Bates End	Document Description
DEF045753	DEF045753	Excel version of DEF011275*
DEF045754	DEF045754	Claim-by-claim data underlying DEF011274 in Excel format*
DEF045755	DEF045755	Claim-by-claim data underlying DEF010558 and DEF011275 in Excel format*
DEF045756	DEF045763	Aggregated market data reports*
DEF045764	DEF045766	Claim-by-claim market data for UMR, Student Resources, OXFORD and CIRRUS platforms*
DEF045767	DEF075425	Administrative records for at issue claims*
DEF075426	DEF075428	Analyses for Nevada Emergency Groups*
DEF075429	DEF079845	Administrative records for at issue claims*
DEF079846	DEF079846	First Updated Claims Matching Detail*
DEF079847	DEF079910	Data iSight State Reports, Appeals Reports, and Specialty Reports; Correspondence between United and MultiPlan, Inc. regarding same*
DEF079911	DEF080136	Correspondence between United and MultiPlan, Inc.*
DEF080137	DEF080137	Reimbursement schedule related to Universal Health Networks agreement*
DEF080138	DEF090984	Administrative records for at issue claims*
DEF011477R	DEF011479R	Confidential, redacted version of Email Message "RE LVSC Freemont ER"
DEF090985	DEF091131	Data iSight State Reports, Appeals Reports, and Specialty Reports; Correspondence between United and MultiPlan, Inc. regarding same*
DEF091132	DEF091579	Correspondence between United and MultiPlan, Inc.*
DEF079847R	DEF079848R	Confidential version of correspondence previously produced between United and MultiPlan, Inc.*
DEF079854R	DEF079854R	Confidential version of correspondence previously produced between United and MultiPlan, Inc.*
DEF079860R	DEF079860R	Confidential version of correspondence previously produced between United and MultiPlan, Inc.*

Bates Start	Bates End	Document Description
DEF079866R	DEF079866R	Confidential version of correspondence previously produced between United and MultiPlan, Inc.*
DEF079872R	DEF079872R	Confidential version of correspondence previously produced between United and MultiPlan, Inc.*
DEF079893R	DEF079893R	Confidential version of correspondence previously produced between United and MultiPlan, Inc.*
DEF079899R	DEF079899R	Confidential version of correspondence previously produced between United and MultiPlan, Inc.*
DEF079905R	DEF079905R	Confidential version of correspondence previously produced between United and MultiPlan, Inc.*
DEF091580	DEF091599	Consulting Provider Agreement between Health Plan of Nevada, Inc. and Sound Physicians Emergency Medicine of Nevada (Bessler), PLLC
DEF091600	DEF091619	Consulting Provider Agreement between Health Plan of Nevada, Inc. and Sound Physicians Emergency Medicine of Nevada
DEF091620	DEF091640	Individual/Group Provider Service Agreement between Sierra Health and Life Insurance Company, Inc., Sierra Healthcare Options, Inc., and Sound Physicians Emergency Medicine of Nevada
DEF091641	DEF097741	Administrative records for at issue claims*
DEF097742	DEF097859	Data iSight State Reports, Appeals Reports, and Specialty Reports; Correspondence between United and MultiPlan, Inc. regarding same*
DEF097860	DEF097860	Sound Physicians Claims Data (Student Resources)*
DEF097861	DEF097861	Sound Physicians Claims Data (UHC)*
DEF097862	DEF097896	Value-based Care Reports*
<b>DEF097897</b>	<b>DEF097897</b>	<b>Sound Physicians Claims Data (Sierra Commercial)*</b>
<b>DEF097898</b>	<b>DEF097898</b>	<b>Sound Physicians Claims Data (Sierra Government)*</b>
<b>DEF097899</b>	<b>DEF097899</b>	<b>Sound Physicians Claims Data (Student Resources supplement)*</b>
<b>DEF097900</b>	<b>DEF097900</b>	<b>Sound Physicians Claims Data (UHC supplement)*</b>
<b>DEF097901</b>	<b>DEF097901</b>	<b>Sound Physicians Claims Data (UMR)*</b>

Defendants reserve the right to supplement this list of documents as discovery continues, and hereby incorporate the documents identified by any other party to this matter solely for the

1 purpose of identifying documents potentially relevant to this action. The inclusion of a document  
 2 herein is not a concession that the document is admissible, relevant, or authentic. Specifically,  
 3 the inclusion of any reports in accordance with NRCP 16.1(a)(1)(A)(ii) is not the equivalent of a  
 4 representation that such reports are relevant, admissible, or to be used in support of Defendants'  
 5 claims or defenses. The documents disclosed herein are listed solely for the purpose of  
 6 identifying documents potentially relevant to this action.

### 7 **III. COMPUTATION OF DAMAGES**

8 Not Applicable.

### 9 **IV. INSURANCE AGREEMENTS**

10 Defendants are self-insured for purposes of this action.

11 DATED this 6th day of March, 2021.

12 /s/ Brittany M. Llewellyn  
 13 D. Lee Roberts, Jr., Esq.  
 14 Colby L. Balkenbush, Esq.  
 15 Brittany M. Llewellyn, Esq.  
 16 WEINBERG, WHEELER, HUDGINS,  
 GUNN & DIAL, LLC  
 6385 South Rainbow Blvd., Suite 400  
 Las Vegas, Nevada 89118

17 Natasha S. Fedder, Esq.  
 18 O'Melveny & Myers LLP  
 400 S. Hope St., 18<sup>th</sup> Floor  
 Los Angeles, CA 90071  
 Telephone: (213) 430-600

20 K. Lee Blalack, II, Esq.  
 21 O'Melveny & Myers LLP  
 1625 Eye St. NW  
 Washington, DC 20006  
 Telephone: (202) 383-5374

23 *Attorneys for Defendants*







**CERTIFICATE OF SERVICE**

I hereby certify that on the 6th day of March, 2021, a true and correct copy of the foregoing **DEFENDANTS' TWENTY-SEVENTH SUPPLEMENT TO INITIAL DISCLOSURE OF WITNESSES AND DOCUMENTS** was electronically served on counsel through the Court's electronic service system pursuant to Administrative Order 14-2 and N.E.F.C.R. 9, via the electronic mail addresses noted below, unless service by another method is stated or noted:

Pat Lundvall, Esq.  
Kristen T. Gallagher, Esq.  
Amanda M. Perach, Esq.  
McDonald Carano LLP  
2300 W. Sahara Ave., Suite 1200  
Las Vegas, Nevada 89102  
plundvall@mcdonaldcarano.com  
kgallagher@mcdonaldcarano.com  
aperach@mcdonaldcarano.com  
*Attorneys for Plaintiffs*

/s/ Brittany M. Llewellyn

An employee of WEINBERG, WHEELER, HUDGINS  
GUNN & DIAL, LLC

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# EXHIBIT 5

**Kristen T. Gallagher**

---

**From:** Llewellyn, Brittany M. <BLlewellyn@wwhgd.com>  
**Sent:** Wednesday, July 15, 2020 10:14 AM  
**To:** Amanda Perach  
**Cc:** Pat Lundvall; Kristen T. Gallagher; Balkenbush, Colby  
**Subject:** RE: TeamHealth v UHC discovery

Good Morning Amanda,

As an initial point of clarification, I just want to note that there was not a single document produced with Defendants' Third Supplemental responses, but four separate documents. As to the remainder of your email, we stand on our objections to your requests to the extent they are unduly burdensome and not proportional to the needs of this case, as further detailed in the responses themselves and in the Sandra Way burden declaration. Further, I would point out that our Third Supplemental responses identify the "performance reports" that we had previously discussed and that we are objecting to producing and withholding. Notwithstanding those objections, Defendants are continuing to search for documents which are relevant and responsive to Plaintiffs' Requests for Production.

Thanks,

Brittany

---

**From:** Amanda Perach [mailto:aperach@mcdonaldcarano.com]  
**Sent:** Tuesday, July 14, 2020 9:49 AM  
**To:** Llewellyn, Brittany M.  
**Cc:** Pat Lundvall; Kristen T. Gallagher; Balkenbush, Colby  
**Subject:** RE: TeamHealth v UHC discovery

**This Message originated outside your organization.**

Brittany,

We received Defendants' Third Supplemental Responses to Fremont Emergency Services (Mandavia) Ltd.'s First Set of Requests for Production of Documents. The only document contained therein was a document titled "Data iSight Client Preferences." Is it Defendants' position that this is the only remaining document responsive to RFP Nos. 12 and 21? Or are Defendants withholding documents? You and Colby mentioned on our previous call that the Defendants intended to prepare a "log" which would list documents Defendants were withholding based on an alleged lack of relevance. Do you intend to produce this? To be clear and as we mentioned on the call, we object to Defendants withholding any documents on the basis of relevance.

Thank you,

**Amanda M. Perach** | Partner

**McDONALD CARANO**

P: 702.873.4100 | E: aperach@mcdonaldcarano.com

---

**From:** Llewellyn, Brittany M. <BLlewellyn@wwhgd.com>  
**Sent:** Thursday, July 9, 2020 8:16 PM  
**To:** Amanda Perach <aperach@mcdonaldcarano.com>  
**Cc:** Pat Lundvall <plundvall@mcdonaldcarano.com>; Kristen T. Gallagher <kgallagher@mcdonaldcarano.com>;

Balkenbush, Colby <CBalkenbush@wwhgd.com>

**Subject:** RE: TeamHealth v UHC discovery

Amanda,

My apologies for the delay. It was a holiday weekend and, as you know, we had other items due to be filed in this case yesterday. We have been working diligently with our client to get responses to your questions/requests, and have also been working to get a supplemental production finalized. I underestimated the time it would take, and I appreciate your patience. Here is where we stand on each of the items you've outlined below:

1. We will be objecting to the production of the "performance reports" for reasons that will be further detailed in our supplemental responses. We hope to have final approval on the responses tomorrow, but at the very latest, we will have them to you on Monday.
2. As above, we are working to get this supplemental production to you. Again, we hope to have final approval tomorrow, but at the very latest, we will have it to you on Monday.
3. We are in the process of finalizing the proposed email protocol. We began working on the proposal as soon as your office agreed to consider same, and have been working with our client on finalizing a draft agreement that we hope will be agreeable to all parties. On this, we also hope to have final approval tomorrow, but at the very latest, we will have it to you on Monday.
4. We have spoken with our client about pulling the portion of the administrative record, which you requested on 6/23 (outlined in our burden declaration at ¶ (d) as "Any other documents comprising the administrative records, such as correspondence or clinical records submitted by Plaintiffs" which was estimated to take 15 minutes per claim). We again note that your request (15 minutes spent on each of the 15,210 claims you are asserting) still amounts to approximately 3,803 man-hours of time dedicated to pulling only a portion of the documents you are seeking. After speaking with our client, we learned that "correspondence" as used in ¶ (d) would *only* likely be contained within those claims files that were administratively appealed. We have asked our client how long it would take them to identify which of your 15,210 claims have been administratively appealed, and were told that it would be a lengthy process. That said, if you are able/amenable to getting us a list of all claims that you know were administratively appealed, we could begin working on pulling these portions of those claims records.

Again, we appreciate your patience.

Thanks,

Brittany

---

**From:** Amanda Perach [<mailto:aperach@mcdonaldcarano.com>]

**Sent:** Thursday, July 09, 2020 12:14 PM

**To:** Llewellyn, Brittany M.

**Cc:** Pat Lundvall; Kristen T. Gallagher; Balkenbush, Colby

**Subject:** RE: TeamHealth v UHC discovery

**This Message originated outside your organization.**

---

Brittany,

There are numerous items that were promised last week and then subsequently promised at the beginning of this week (after the former deadline was missed) which have not been received. I have listed these items below.

1. You state below that you planned to have an answer on whether "performance reports" were going to be produced by July 3, 2020. (We "will either produce these reports or object to their production by July 3."). You further

note that you had copies of these “performance reports” as of June 23, 2020. We have not received any information from you on this issue nor have any of these documents been produced.

2. With respect to RFP Nos. 12 and 21, you represented that United would “be producing documents relating to Data iSight on or before 7/3.” Again, we have not received any such documents.
3. Although the Health Care Providers never agreed to a search term protocol, you stated that United would like to propose this as a more efficient way of producing email correspondence. Despite United’s supposition that this would make any email production more efficient, we still have not even received a proposed protocol from you. This was promised to be sent no later than July 3<sup>rd</sup>.
4. In the attached email, you state that you were speaking with United on July 2nd about pulling the administrative record and aspects of that record. You stated that we would receive an update by July 3<sup>rd</sup>. Again, we have not received any information on this to date.

We are seeing repeated delays with respect to discovery from United. If we do not receive these documents/information by the end of the day today, we will proceed forward with a motion to compel on the same.

Thank you,

**Amanda M. Perach** | Partner

**McDONALD CARANO**

P: 702.873.4100 | E: [aperach@mcdonaldcarano.com](mailto:aperach@mcdonaldcarano.com)

---

**From:** Llewellyn, Brittany M. <[BLlewellyn@wwhgd.com](mailto:BLlewellyn@wwhgd.com)>

**Sent:** Friday, July 3, 2020 8:21 PM

**To:** Amanda Perach <[aperach@mcdonaldcarano.com](mailto:aperach@mcdonaldcarano.com)>

**Cc:** Pat Lundvall <[plundvall@mcdonaldcarano.com](mailto:plundvall@mcdonaldcarano.com)>; Kristen T. Gallagher <[kgallagher@mcdonaldcarano.com](mailto:kgallagher@mcdonaldcarano.com)>;

Balkenbush, Colby <[CBalkenbush@wwhgd.com](mailto:CBalkenbush@wwhgd.com)>

**Subject:** RE: TeamHealth v UHC discovery

Amanda,

We had promised a supplement by today, but we are still awaiting approval, and my office closed early today so I do not have anyone around to serve if approval comes in later tonight. We will have it to you at the beginning of next week.

Thanks,

Brittany

---

**From:** Amanda Perach [<mailto:aperach@mcdonaldcarano.com>]

**Sent:** Tuesday, June 30, 2020 1:38 PM

**To:** Llewellyn, Brittany M.

**Cc:** Pat Lundvall; Kristen T. Gallagher; Balkenbush, Colby

**Subject:** RE: TeamHealth v UHC discovery

**This Message originated outside your organization.**

Brittany,

We reserve our right to respond to the rest of the below as we disagree with many of your statements; however, with respect to the below-highlighted statement, do you have any updates from your client?

Thanks,

**Amanda M. Perach** | Partner

**McDONALD CARANO**

P: 702.873.4100 | E: [aperach@mcdonaldcarano.com](mailto:aperach@mcdonaldcarano.com)

---

**From:** Llewellyn, Brittany M. <[BLlewellyn@wwhgd.com](mailto:BLlewellyn@wwhgd.com)>  
**Sent:** Friday, June 26, 2020 9:50 AM  
**To:** Amanda Perach <[aperach@mcdonaldcarano.com](mailto:aperach@mcdonaldcarano.com)>  
**Cc:** Pat Lundvall <[plundvall@mcdonaldcarano.com](mailto:plundvall@mcdonaldcarano.com)>; Kristen T. Gallagher <[kgallagher@mcdonaldcarano.com](mailto:kgallagher@mcdonaldcarano.com)>; Balkenbush, Colby <[CBalkenbush@wwhgd.com](mailto:CBalkenbush@wwhgd.com)>  
**Subject:** RE: TeamHealth v UHC discovery

Amanda,

Please review our responses to your comments (in blue) below.

Thank you,

Brittany

---

**From:** Amanda Perach [<mailto:aperach@mcdonaldcarano.com>]  
**Sent:** Wednesday, June 24, 2020 9:03 PM  
**To:** Llewellyn, Brittany M.; Balkenbush, Colby  
**Cc:** Pat Lundvall; Kristen T. Gallagher  
**Subject:** RE: TeamHealth v UHC discovery

**This Message originated outside your organization.**

Brittany and Colby,

After having completed our last meet and confer, we wanted to address a few points referenced in your email and on our meet and confer calls.

One item not fully addressed in your email is United's position on pulling the "administrative record." To summarize that issue, during our June 23 meet and confer, you indicated that United stands on its Sandra Way declaration regarding collection of information that United has characterized as the "administrative record." In earlier meet and confer discussions, you indicated that due to the alleged burden, United has not started any collection or production of documents that you assert are in the "administrative record" and you have stated that information is contained in no other database than the one that holds the "administrative record." You have also indicated that United has not tried to access parts of the "administrative record" like emails in connection with any of Plaintiffs' document requests even though such emails would be responsive to such requests. Thus, we understand that United has not made any effort, at this point, to collect any portion of the "administrative record" for any claim at issue in this litigation based on United's contention that doing so would create an undue burden.

you as soon as we have an answer from our client This does not accurately reflect what we stated during the June 23 meet and confer. While we stand on our objections as stated in Sandra Way's burden declaration, this misconstrues our position. During our call, you asked if we had begun pulling certain portions of the administrative record, and gave the example of the documents referenced in ¶ (d) which states "Other documents comprising the administrative records: 15 minutes." You had not previously asked that we pull only certain portions of the administrative record, and we responded that we would speak with our client about pulling the "other documents" that would fall under ¶ (d). While we intend to ask our client about pulling certain portions of the record, please note that your request (15 minutes spent on each of the 15,210 claims you are asserting) still amounts to approximately 3,803 man-hours of time dedicated to pulling only a portion of the documents you are seeking. It cannot reasonably be disputed that this is still a tremendous

endeavor to undertake. Due to the enormity of this request, (which, again, was made for the first time during the 6/23 meet and confer) we could not simply agree without first speaking with our client. We will need to discuss their ability and willingness to dedicate their employees to working on this task, which (by our quick estimate) would work out to approximately a year of work for two people working full-time. We again submit that we will discuss this with our client, and will respond to.

Our remaining comments are below in red.

Thank you,

**Amanda M. Perach** | Partner

**McDONALD CARANO**

P: 702.873.4100 | E: [aperach@mcdonaldcarano.com](mailto:aperach@mcdonaldcarano.com)

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**From:** Llewellyn, Brittany M. <[BLlewellyn@wwhgd.com](mailto:BLlewellyn@wwhgd.com)>

**Sent:** Tuesday, June 23, 2020 9:12 AM

**To:** Kristen T. Gallagher <[kgallagher@mcdonaldcarano.com](mailto:kgallagher@mcdonaldcarano.com)>

**Cc:** Balkenbush, Colby <[CBalkenbush@wwhgd.com](mailto:CBalkenbush@wwhgd.com)>; Amanda Perach <[aperach@mcdonaldcarano.com](mailto:aperach@mcdonaldcarano.com)>

**Subject:** TeamHealth v UHC discovery

Kristen,

In advance of our call today, I am sending a general overview of where we are with respect to your request for supplementation of requests for production:

1. **Multiplan Contracts:** After considering the issues and conferring with our client, we cannot agree to produce un-redacted copies. We agree that you have met your meet and confer obligations and will not oppose a motion to compel on that ground. We will oppose the substance of any forthcoming motion to compel.
2. **Request for Production 11:** As we have discussed on prior calls, information responsive to this request is generally found within the administrative record. We have detailed the process of gathering the administrative record in the burden declaration of Sandra Way. On our last call, you asked us to confirm that the timeline set forth in the declaration is still accurate, and that the records could not be pulled any faster. We have since confirmed with our client that the statements in the burden declaration are still accurate, and that this is the fastest timeframe possible for pulling each of the claims. **On our call, you confirmed that you specifically asked your client whether there was a different method available for pulling these records which was more efficient and you were informed that there was not. You were not willing to disclose the name of the person who confirmed this, but stated that it was not Sandra Way.**  
This is correct.

In addition to the administrative record, we are also in the process of gathering closure reports for the relevant claims. Before we are able to pull each closure report, we have to gather a list of claims processed by data iSight. We are working on compiling this list, and will then utilize that list to pull the closure reports. By our clients' estimate, the process of determining which of Plaintiffs' claims have been processed by Data iSight will be complete sometime between twenty-one (21) to sixty (60) days from today. Once we have determined which claims have been processed by Data iSight, it will take approximately 2 weeks to pull the actual closure reports for those claims. We further understand that the TeamHealth providers would be able to identify which of their claims were processed by Data iSight on their own. However, this information was not included in TeamHealth's claim spreadsheet (i.e. bates number FESM000011) To the extent the TeamHealth providers can identify which

of their claims were processed by Data iSight sooner than the Defendants can, this would certainly shorten the timeline for production.

Finally, per your request for “performance reports,” we have received these documents from our client yesterday afternoon, and we are in the process of reviewing same. We intend to have an answer to you on whether we will be producing them by the end of this week. We did identify reports evaluating performance of Data iSight as one group of documents we imagine exist and which would be responsive to this request; however, we never limited this request to only these such reports. Certainly, as the propounding party, we do not know the full scope of documents that exist. It is United’s obligation to identify any documents responsive to the request. That should include all email communications with Data iSight relating to claims or services provided by Plaintiffs. You have stated that there are no emails responsive to this request, but could not answer how performance reports or closure reports were delivered to your clients. You later indicated that if there are responsive emails, these would be captured in the search protocol you intend to circulate to us. To be clear, we have never limited this request for production and expect the production of all records responsive to this request, including any email correspondence with Data iSight relating to any claims or services provided by Plaintiffs. We also disagree with United’s attempt to narrow the request to only documents specific to an at-issue claim instead of the plain reading of the request.

We agree that it is United’s obligation to identify documents that are responsive to this request, but disagree with your contention that we are attempting to improperly narrow the request. Your request asks us to “[p]roduce all Documents and/or Communications between You and any third-party, including but not limited to Data iSight, relating to (a) any claim for payment for medical services rendered by Fremont to any Plan Member, or (b) any medical services rendered by Fremont to any Plan Member.” Per the language in subsections (a) and (b) of your request, it seeks documents/communications relating to claims for payment or medical services rendered by the Plaintiffs. To the extent your request seeks documents that pertain to non-party providers, claims, or issues that are beyond the scope of this litigation, United does not read the request to ask for this, but nevertheless will not produce documents that are indisputably beyond the scope of this litigation and therefore irrelevant.

Responding further, per our conversation on 6/23, we agreed to find out how performance reports and closure reports are delivered, and intend to respond when such information is received. Please note we are still evaluating whether the “performance reports” are responsive to this request, and will either produce these reports or object to their production by July 3.

As far as what this request calls for, our understanding is that the only emails that would be responsive to RFP 11 would be in the administrative record. We did not represent that “responsive emails . . . would be captured in the search protocol [we] intend to circulate to [you].” What is/will be captured by searches would depend on the custodians you name, and the search terms you propose.

3. **Request for Production 12/21:** We are still in the process of reviewing whether there are additional documents pertaining to United’s relationship with Data iSight that are potentially relevant to the claims at issue in this action other than the performance reports and contracts. To the extent we withhold anything related to this relationship based on relevance, privilege or on some other basis, we will notify you of same in our supplemental responses so that it is clear what is being produced and what is being withheld (and if so on what basis). We have requested all documents relating to Data iSight’s relationship with United. At the last meet and confer, you stated that you asked United to provide a list of all documents relating to relationship with Data iSight and that you would have all such information by the date of the next meet and confer. That did not happen. Instead, you noted that your client is still searching for documents and you could not provide us with a list of documents relating to the relationship between Data iSight and United. You also stated that you will be reviewing potentially responsive documents and if you deem them to be irrelevant you will be withholding such documents and putting the names of such documents in some type of log. We do not believe there is a legal basis to withhold responsive documents on the basis of relevance and object to United proceeding in this manner.



At no time did we ever represent that we would have all documents relating to Data iSight by 6/23. We are still working to collect and review documents that are responsive to this request. That said, we will be producing documents relating to Data iSight on or before 7/3. Finally, we disagree with your contention that there is no legal basis to withhold irrelevant documents. A party always has a right to withhold documents that it has evaluated and determined are not responsive. NRCP 26 does not dictate that a party must produce irrelevant documents.

4. **Requests for Production 13/27:** To address how emails should be produced in this matter, we have drafted a protocol for the exchange of search terms and custodians and the search of email repositories. We have just sent our client a second draft of the protocol. We expect to have a draft protocol to you no later than the next 7-10 days and hopefully sooner. The protocol will include a deadline for each party to name email custodians it is seeking emails from, a deadline for the selection of search terms and a deadline for the actual production of the responsive emails. We believe the protocol will effectively address not only RFPs 13 and 27 but also any other email RFPs the TeamHealth providers have served/will serve in the future as well as United's email RFPs. **As we stated on our call, we never agreed to search terms. We also asked if you could provide us with a target date for production of any of the over 100,000 emails you are reviewing and you would not provide us with any estimate for production.**

As stated on our phone call of 6/23, it does not make sense for us to work to provide a production target date until we know whether you are amenable to a protocol or not. We believe a search protocol is the most efficient way of gathering emails. If you are not amenable to a search protocol, we will evaluate targets for rolling productions or move the court for an order requiring a search term protocol.

5. **Request for Production 37:** We have identified further responsive documents for production and will serve a supplement before the end of this week (6/26). **On our call, you further stated that this production would not include any email correspondence with providers or form plan documents we had discussed on our previous meet and confer. You stated that your client does not have a set of plans that would have been issued to certain members for a certain time period that could serve as form plan documents. The only documents you will be supplementing appear to be member-facing policy documents relating to out of network providers.** We take issue with the way your response is worded as it suggests that we are withholding potentially responsive correspondence. Your request No. 37 asks that we "[p]roduce any and all Documents and/or Communications concerning Emergency Medicine Services and/or Emergency Department Services You published, provided or made available to either Emergency Medicine Groups or Your Plan Members in Nevada from 2016 to the present concerning Your reimbursement of out-of-network services." Our understanding from our client is that they do not have email correspondence that is responsive to this request. Finally, per our phone call, we will be providing a supplemental response to this request today (6/26).

**Lastly, we all agreed that following the supplement this week, if we believe that there remain deficiencies, we may proceed with moving to compel as we have exhausted our meet and confer efforts on these topics.**

We do not agree, and do not believe we have exhausted our efforts. We are continuing in our search efforts and need more time. TeamHealth has asserted 15,210 claims in this litigation, which include different members, plans, and treatment. The idea that we should be able to produce all information related to these claims within a month is unreasonable. These discovery efforts require coordination between different departments, which are currently tasked with handling litigation from TeamHealth Plaintiffs in several different jurisdictions. Accordingly, we do not agree that you are justified in filing a motion to compel, and again ask that you be patient with our continued attempts to fulfill our discovery obligations. Again, per the above, we will be producing documents today, June 26, and next Friday, July 3.

Thanks,

Brittany



Brittany M. Llewellyn, Attorney

**Weinberg Wheeler Hudgins Gunn & Dial**

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89118

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The information contained in this message may contain privileged client confidential information. If you have received this message in error, please delete it and any copies immediately.

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# EXHIBIT 6

Bates/Control #	End Bates/Control	Confidentiality	Custodian	Date Sent
DEF010455	DEF010456	ATTORNEY'S EYES ONLY	Paradise, Rebecca	12/28/2017
DEF010457	DEF010457	ATTORNEY'S EYES ONLY	Paradise, Rebecca	6/21/2019
DEF010458	DEF010459	ATTORNEY'S EYES ONLY	Paradise, Rebecca	6/21/2019
DEF010460	DEF010462	ATTORNEY'S EYES ONLY	Paradise, Rebecca	9/11/2019
DEF010463	DEF010466	ATTORNEY'S EYES ONLY	Paradise, Rebecca	9/12/2019
DEF010467	DEF010469	ATTORNEY'S EYES ONLY	Paradise, Rebecca	9/12/2019
DEF010470	DEF010474	ATTORNEY'S EYES ONLY	Paradise, Rebecca	9/27/2019
DEF010475	DEF010479	ATTORNEY'S EYES ONLY	Paradise, Rebecca	9/27/2019
DEF010480	DEF010483	ATTORNEY'S EYES ONLY	Paradise, Rebecca	9/27/2019
DEF010484	DEF010484	ATTORNEY'S EYES ONLY	Paradise, Rebecca	9/27/2019
DEF010485	DEF010487	ATTORNEY'S EYES ONLY	Paradise, Rebecca	9/27/2019
DEF010488	DEF010494	ATTORNEY'S EYES ONLY	Paradise, Rebecca	9/27/2019
DEF010495	DEF010495	ATTORNEY'S EYES ONLY	Paradise, Rebecca	9/27/2019
DEF010496	DEF010501	ATTORNEY'S EYES ONLY	Paradise, Rebecca	9/27/2019
DEF010502	DEF010509	ATTORNEY'S EYES ONLY	Paradise, Rebecca	9/27/2019
DEF010510	DEF010518	ATTORNEY'S EYES ONLY	Paradise, Rebecca	10/2/2019
DEF010519	DEF010524	ATTORNEY'S EYES ONLY	Paradise, Rebecca	10/2/2019
DEF010525	DEF010529	ATTORNEY'S EYES ONLY	Paradise, Rebecca	10/2/2019
DEF010530	DEF010534	ATTORNEY'S EYES ONLY	Paradise, Rebecca	10/2/2019
DEF010535	DEF010543	ATTORNEY'S EYES ONLY	Paradise, Rebecca	10/3/2019
DEF010544	DEF010545	ATTORNEY'S EYES ONLY	Paradise, Rebecca	9/26/2019
DEF010546	DEF010546	ATTORNEY'S EYES ONLY	Paradise, Rebecca	9/26/2019
DEF010547	DEF010548	ATTORNEY'S EYES ONLY	Paradise, Rebecca	9/26/2019
DEF010549	DEF010551	ATTORNEY'S EYES ONLY	Paradise, Rebecca	9/26/2019
DEF010552	DEF010554	ATTORNEY'S EYES ONLY	Paradise, Rebecca	11/7/2019

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# EXHIBIT 7

Pat Lundvall (NSBN 3761)  
Kristen T. Gallagher (NSBN 9561)  
Amanda M. Perach (NSBN 12399)  
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aperach@mcdonaldcarano.com

*Attorneys for Plaintiffs*

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

FREMONT EMERGENCY SERVICES  
(MANDAVIA), LTD., a Nevada professional  
corporation; TEAM PHYSICIANS OF  
NEVADA-MANDAVIA, P.C., a Nevada  
professional corporation; CRUM, STEFANKO  
AND JONES, LTD. dba RUBY CREST  
EMERGENCY MEDICINE, a Nevada  
professional corporation,

Plaintiffs,

vs.

UNITEDHEALTH GROUP, INC., a Delaware  
corporation; UNITED HEALTHCARE  
INSURANCE COMPANY, a Connecticut  
corporation; UNITED HEALTH CARE  
SERVICES INC., dba  
UNITEDHEALTHCARE, a Minnesota  
corporation; UMR, INC., dba UNITED  
MEDICAL RESOURCES, a Delaware  
corporation; OXFORD HEALTH PLANS,  
INC., a Delaware corporation; SIERRA  
HEALTH AND LIFE INSURANCE  
COMPANY, INC., a Nevada corporation;  
SIERRA HEALTH-CARE OPTIONS, INC., a  
Nevada corporation; HEALTH PLAN OF  
NEVADA, INC., a Nevada corporation; DOES  
1-10; ROE ENTITIES 11-20,

Defendants.

Case No.: A-19-792978-B  
Dept. No.: XXVII

**DECLARATION OF KRISTEN T.  
GALLAGHER IN SUPPORT OF  
PLAINTIFFS' RENEWED MOTION  
FOR ORDER TO SHOW CAUSE WHY  
DEFENDANTS SHOULD NOT BE HELD  
IN CONTEMPT AND FOR SANCTIONS**

I, KRISTEN T. GALLAGHER, declare as follows:

1. I am an attorney licensed to practice law in the State of Nevada and am a partner  
in the law firm of McDonald Carano LLP, counsel for plaintiffs Fremont Emergency Services

1 (Mandavia), Ltd. (“Fremont”); Team Physicians of Nevada-Mandavia, P.C. (“Team  
2 Physicians”); Crum, Stefanko and Jones, Ltd. dba Ruby Crest Emergency Medicine (“Ruby  
3 Crest” and collectively the “Health Care Providers”).

4 2. This declaration is submitted in support of the Plaintiffs’ Renewed Motion For  
5 Order To Show Cause Why Defendants Should Not Be Held In Contempt And For Sanctions  
6 and is made of my own personal knowledge, unless otherwise indicated. I am over 18 years of  
7 age, and I am competent to testify as to same.

8 3. United produced a closure report (DEF010555) that includes no claims from 2017  
9 and just one claim from 2018.

10 4. Exhibit 6 to the Motion identifies United’s assigned Bates-number and related  
11 metadata fields related to DEF010455-10554; redacted version, DEF07984R-79905R, except a  
12 date column was added by Karen Surowiec, a McDonald Carano LLP paralegal working on this  
13 matter, because United did not supply a load file with this metadata for this production. The  
14 emails in DEF010455-10554; redacted version, DEF07984R-79905R make reference to other  
15 unproduced documents that describe quarterly meetings, references to the expansion of certain  
16 capabilities, the ability of United to make adjustments based on business objectives, and  
17 assertions related to the alleged defensibility of the data set, among other things that make it  
18 clear these are not one-off, isolated communications.

19 5. Exhibit 8 to the Motion identifies United’s assigned Bates-number and related  
20 metadata fields related to DEF079991-80136. For the period October 18, 2016 through May 15,  
21 2019, a total of 75 emails/attachments (DEF079991-80136), totaling 145 pages, including a total  
22 of just 17 emails for all of 2017, 14 emails for all of 2018 and 10 emails for the first five months  
23 of 2019. The emails that have been produced refer to additional meetings and activity that  
24 underscores how frequently routine exchanges took place. For example, DEF079911 and  
25 DEF080036 reference bi-monthly governance plans and related agendas, yet only two emails  
26 from June 13, 2018 relating to a May 2018 governance meeting have been produced. Exhibit 9  
27 to the Motion identifies United’s assigned Bates-number and related metadata fields  
28 demonstrating the two emails produced.

6. Exhibit 10 to the Motion identifies United's assigned Bates-number and related metadata fields related to DEF091132-091579. For the period 2014-2020, 121 emails/attachments (DEF091132-091579), totaling 447 pages, comprised of various emails that include United-provided scripts for discussions with providers about the reimbursement rates.

a. The documents in this Bates-range make reference to other types of activity reports, meetings and meeting notes, United's implementation of an outlier cost management ("OCM") program and negotiation parameters and references to other documents approved by MultiPlan executives (DEF091427) that have not been produced, but to which the Health Care Providers know exist (e.g. whitepapers<sup>1</sup> and other Data iSight presentation materials). Further, a 2017 first quarter performance deck is referenced in a July 24, 2017 email (DEF091537) and references to a 2017 UMR data review and files that were exchanged (DEF091562) appear to depict "scenarios" and forecasts, but which United has not produced. In fact, there appears to be a shared drive and or use of an FTP site where MultiPlan uploaded spreadsheets for United's review.

7. Exhibit 12 to the Motion identifies United's assigned Bates-number and related metadata fields related to United's production of Data iSight reports.

8. DEF075426 is a single tab, 17-line spreadsheet that purports to show seven other Nevada in-network emergency medicine provider groups' reimbursement schedule with Health Plan of Nevada, Sierra Health and Life, Sierra Health Options and Medicaid; and lists six out-of-network provider groups with nothing other than "non-par" (non-participating) with no indication of the reimbursement amount for the out-of-network providers. The other two spreadsheets in DEF07547-75428 contain heavily redacted information about median rates.

9. DEF010559-11089 largely consist of meeting invites and discussions about scheduling meetings; and a limited set of emails between United and MultiPlan in DEF10455-10554.

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<sup>1</sup> One email chain with "whitepapers" has been produced (DEF091467) from 2016; therefore, the Health Care Providers do not believe this is a fulsome production.



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**MCDONALD CARANO**2300 WEST SAHARA AVENUE, SUITE 1200 • LAS VEGAS, NEVADA 89102  
PHONE 702.873.4100 • FAX 702.873.9966

1           10.     For the communications between UH Parties and Fremont (RFP No. 27), United  
2 has cited to four emails, none of which concern negotiations leading up to any participation  
3 agreements with Fremont, in effect prior to July 1, 2017.

4           I declare under penalty of perjury that the foregoing is true and correct.

5           Executed: March 8, 2021.

/s/ Kristen T. Gallagher

Kristen T. Gallagher

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# EXHIBIT 8

Bates/Control #	End Bates/Control #	Confidentiality	Custodian	Date Sent
DEF080086	DEF080086	ATTORNEYS' EYES ONLY	Peterson, Sarah	10/18/2016 9:49
DEF080083	DEF080085	ATTORNEYS' EYES ONLY	Peterson, Sarah	10/20/2016 9:08
DEF080093	DEF080095	ATTORNEYS' EYES ONLY	Peterson, Sarah	2/6/2017 12:29
DEF080088	DEF080092	ATTORNEYS' EYES ONLY	Peterson, Sarah	2/6/2017 12:40
DEF080096	DEF080099	ATTORNEYS' EYES ONLY	Peterson, Sarah	2/6/2017 12:40
DEF080105	DEF080109	ATTORNEYS' EYES ONLY	Peterson, Sarah	2/6/2017 12:43
DEF080100	DEF080104	ATTORNEYS' EYES ONLY	Peterson, Sarah	2/6/2017 13:25
DEF080112	DEF080113	ATTORNEYS' EYES ONLY	Peterson, Sarah	2/7/2017 15:21
DEF080110	DEF080111	ATTORNEYS' EYES ONLY	Peterson, Sarah	2/7/2017 15:35
DEF080114	DEF080118	ATTORNEYS' EYES ONLY	Peterson, Sarah	3/6/2017 10:57
DEF080119	DEF080120	ATTORNEYS' EYES ONLY	Peterson, Sarah	5/3/2017 12:01
DEF080072	DEF080074	ATTORNEYS' EYES ONLY	Paradise, Rebecca	5/3/2017 15:07
DEF080121	DEF080122	ATTORNEYS' EYES ONLY	Peterson, Sarah	5/15/2017 9:10
DEF080126	DEF080127	ATTORNEYS' EYES ONLY	Peterson, Sarah	5/19/2017 14:59
DEF080123	DEF080125	ATTORNEYS' EYES ONLY	Peterson, Sarah	5/19/2017 16:04
DEF080077	DEF080080	ATTORNEYS' EYES ONLY	Paradise, Rebecca	5/22/2017 12:16
DEF080075	DEF080076	ATTORNEYS' EYES ONLY	Paradise, Rebecca	5/22/2017 14:48
DEF080128	DEF080129	ATTORNEYS' EYES ONLY	Peterson, Sarah	8/16/2017 10:24
DEF080130	DEF080130	ATTORNEYS' EYES ONLY	Peterson, Sarah	10/26/2017 8:12
DEF079955	DEF079956	ATTORNEYS' EYES ONLY	Paradise, Rebecca	1/17/2018 13:52
DEF080134	DEF080136	ATTORNEYS' EYES ONLY	Peterson, Sarah	2/28/2018 13:46
DEF080131	DEF080133	ATTORNEYS' EYES ONLY	Peterson, Sarah	2/28/2018 13:48
DEF079957	DEF079957	ATTORNEYS' EYES ONLY	Paradise, Rebecca	3/12/2018 15:52

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Bates/Control #	End Bates/Control #	Confidentiality	Custodian	Date Sent
DEF079960	DEF079960	ATTORNEYS' EYES ONLY	Paradise, Rebecca	3/14/2018 13:23
DEF079959	DEF079959	ATTORNEYS' EYES ONLY	Paradise, Rebecca	3/14/2018 15:48
DEF079961	DEF079962	ATTORNEYS' EYES ONLY	Paradise, Rebecca	3/23/2018 4:23
DEF079976	DEF079977	ATTORNEYS' EYES ONLY	Paradise, Rebecca	3/26/2018 10:45
DEF079963	DEF079965	ATTORNEYS' EYES ONLY	Paradise, Rebecca	3/26/2018 10:59
DEF079978	DEF079980	ATTORNEYS' EYES ONLY	Paradise, Rebecca	3/26/2018 11:12
DEF079981	DEF079984	ATTORNEYS' EYES ONLY	Paradise, Rebecca	3/26/2018 11:14
DEF079972	DEF079975	ATTORNEYS' EYES ONLY	Paradise, Rebecca	3/26/2018 11:19
DEF079966	DEF079971	ATTORNEYS' EYES ONLY	Paradise, Rebecca	3/26/2018 11:21
DEF079985	DEF079989	ATTORNEYS' EYES ONLY	Paradise, Rebecca	3/26/2018 11:22
DEF079914	DEF079919	ATTORNEYS' EYES ONLY	Bradley, Jolene	4/5/2018 15:14
DEF079998	DEF080003	ATTORNEYS' EYES ONLY	Paradise, Rebecca	4/5/2018 15:14
DEF080004	DEF080009	ATTORNEYS' EYES ONLY	Paradise, Rebecca	4/5/2018 15:15
DEF080010	DEF080016	ATTORNEYS' EYES ONLY	Paradise, Rebecca	4/5/2018 15:21
DEF080023	DEF080029	ATTORNEYS' EYES ONLY	Paradise, Rebecca	4/5/2018 15:29
DEF080017	DEF080022	ATTORNEYS' EYES ONLY	Paradise, Rebecca	4/5/2018 15:34
DEF079990	DEF079997	ATTORNEYS' EYES ONLY	Paradise, Rebecca	4/5/2018 15:35
DEF079920	DEF079925	ATTORNEYS' EYES ONLY	Bradley, Jolene	4/23/2018 9:42
DEF080030	DEF080035	ATTORNEYS' EYES ONLY	Paradise, Rebecca	4/23/2018 9:42
DEF079911	DEF079912	ATTORNEYS' EYES ONLY	Bradley, Jolene	6/13/2018 10:11
DEF080036	DEF080037	ATTORNEYS' EYES ONLY	Paradise, Rebecca	6/13/2018 10:11
DEF080039	DEF080040	ATTORNEYS' EYES ONLY	Paradise, Rebecca	8/21/2018 13:05
DEF080041	DEF080041	ATTORNEYS' EYES ONLY	Paradise, Rebecca	8/21/2018 13:05

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Bates/Control #	End Bates/Control #	Confidentiality	Custodian	Date Sent
DEF080044	DEF080046	ATTORNEYS' EYES ONLY	Paradise, Rebecca	9/14/2018 10:11
DEF079926	DEF079930	ATTORNEYS' EYES ONLY	Bradley, Jolene	10/15/2018 14:46
DEF079934	DEF079935	ATTORNEYS' EYES ONLY	Bradley, Jolene	11/30/2018 10:30
DEF079931	DEF079933	ATTORNEYS' EYES ONLY	Bradley, Jolene	11/30/2018 10:40
DEF079936	DEF079938	ATTORNEYS' EYES ONLY	Bradley, Jolene	3/19/2019 8:51
DEF080055	DEF080058	ATTORNEYS' EYES ONLY	Paradise, Rebecca	3/19/2019 9:33
DEF080059	DEF080063	ATTORNEYS' EYES ONLY	Paradise, Rebecca	3/20/2019 13:46
DEF080064	DEF080069	ATTORNEYS' EYES ONLY	Paradise, Rebecca	3/21/2019 14:03
DEF079939	DEF079942	ATTORNEYS' EYES ONLY	Bradley, Jolene	4/2/2019 7:53
DEF079943	DEF079943	ATTORNEYS' EYES ONLY	Bradley, Jolene	4/10/2019 9:35
DEF079944	DEF079945	ATTORNEYS' EYES ONLY	Bradley, Jolene	4/16/2019 7:15
DEF079946	DEF079947	ATTORNEYS' EYES ONLY	Bradley, Jolene	5/1/2019 8:13
DEF079948	DEF079949	ATTORNEYS' EYES ONLY	Bradley, Jolene	5/1/2019 8:50
DEF079950	DEF079950	ATTORNEYS' EYES ONLY	Bradley, Jolene	5/15/2019 10:33
DEF080137	DEF080137	CONFIDENTIAL	CORP	
DEF079913	DEF079913	ATTORNEYS' EYES ONLY	Bradley, Jolene	
DEF079951	DEF079952	ATTORNEYS' EYES ONLY	Bradley, Jolene	
DEF079953	DEF079954	ATTORNEYS' EYES ONLY	Haben, John	
DEF079958	DEF079958	ATTORNEYS' EYES ONLY	Paradise, Rebecca	
DEF080038	DEF080038	ATTORNEYS' EYES ONLY	Paradise, Rebecca	
DEF080042	DEF080043	ATTORNEYS' EYES ONLY	Paradise, Rebecca	
DEF080047	DEF080048	ATTORNEYS' EYES ONLY	Paradise, Rebecca	
DEF080049	DEF080050	ATTORNEYS' EYES ONLY	Paradise, Rebecca	

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Bates/Control #	End Bates/Control #	Confidentiality	Custodian	Date Sent
DEF080051	DEF080052	ATTORNEYS' EYES ONLY	Paradise, Rebecca	
DEF080053	DEF080054	ATTORNEYS' EYES ONLY	Paradise, Rebecca	
DEF080070	DEF080071	ATTORNEYS' EYES ONLY	Paradise, Rebecca	
DEF080081	DEF080082	ATTORNEYS' EYES ONLY	Paradise, Rebecca	
DEF080087	DEF080087	ATTORNEYS' EYES ONLY	Peterson, Sarah	

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# EXHIBIT 9

Bates/Control #	Type	Author	Cc	Date Sent	Subject	Confidentiality	Custodian	Filename
DEF079911	Email	Johnson, Emma	Dugan, Kim [Kim.Dugan@multiplan.com]	6/13/2018 10:11	RE: BiMonthly Governance Meeting - Provider Review Document	ATTORNEYS' EYES ONLY	Bradley, Jolene	RE_BiMo Governance Meeting - Review Document
DEF079913	Document	William Henderson			Section I	ATTORNEYS' EYES ONLY	Bradley, Jolene	Data iSight Governance Meeting 18.docx



Bates/Control #	Type	Author	Cc	Date Sent	Subject	Confidentiality	Custodian	Filename
DEF080036	Email	Johnson, Emma	Dugan, Kim [Kim.Dugan@m ultiplan.com]	6/13/2018 10:11	RE: BiMonthly Governance Meeting - Provider Review Document	ATTORNEYS' EYES ONLY	Paradise, Rebecca	RE_BiMo Governan Meeting - Review D
DEF080038	Document	William Henderson			Section I	ATTORNEYS' EYES ONLY	Paradise, Rebecca	Data iSigh Governan Meeting 18.docx

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# EXHIBIT 10

Bates/ Control #	End Bates/ Control #	Confidentiality	Custodian	Date Created	Date Modified	Date Sent
DEF091132	DEF091133	ATTORNEYS' EYES ONLY	Bradley, Jolene	4/14/2020 18:14	7/2/2018	5/11/2018 10:33
DEF091134	DEF091134	ATTORNEYS' EYES ONLY	Bradley, Jolene	5/11/2018 10:03	5/11/2018	
DEF091135	DEF091135	ATTORNEYS' EYES ONLY	Bradley, Jolene	4/14/2020 18:14	8/21/2018	8/21/2018 14:52
DEF091136	DEF091138	ATTORNEYS' EYES ONLY	Bradley, Jolene	4/14/2020 18:15	9/19/2016	8/5/2016 8:44
DEF091139	DEF091139	ATTORNEYS' EYES ONLY	Bradley, Jolene			8/21/2018 14:52
DEF091140	DEF091141	ATTORNEYS' EYES ONLY	Bradley, Jolene			1/25/2019 12:17
DEF091142	DEF091143	ATTORNEYS' EYES ONLY	Bradley, Jolene			1/25/2019 10:33
DEF091144	DEF091146	ATTORNEYS' EYES ONLY	Bradley, Jolene			3/27/2019 8:50
DEF091147	DEF091149	ATTORNEYS' EYES ONLY	Bradley, Jolene			3/27/2019 10:32
DEF091150	DEF091150	ATTORNEYS' EYES ONLY	Bradley, Jolene			12/3/2019 10:50
DEF091151	DEF091156	ATTORNEYS' EYES ONLY	Bradley, Jolene	11/8/2019 10:17	11/19/2019	
DEF091157	DEF091159	ATTORNEYS' EYES ONLY	Bradley, Jolene			12/16/2019 14:43
DEF091160	DEF091162	ATTORNEYS' EYES ONLY	Bradley, Jolene			12/18/2019 15:33
DEF091163	DEF091166	ATTORNEYS' EYES ONLY	Bradley, Jolene			1/7/2020 18:12
DEF091167	DEF091170	ATTORNEYS' EYES ONLY	Bradley, Jolene			1/7/2020 8:39
DEF091171	DEF091175	ATTORNEYS' EYES ONLY	Bradley, Jolene			1/8/2020 12:09
DEF091176	DEF091180	ATTORNEYS' EYES ONLY	Bradley, Jolene			1/21/2020 10:18
DEF091181	DEF091186	ATTORNEYS' EYES ONLY	Bradley, Jolene			1/22/2020 7:40
DEF091187	DEF091194	ATTORNEYS' EYES ONLY	Bradley, Jolene			1/23/2020 14:31
DEF091195	DEF091203	ATTORNEYS' EYES ONLY	Bradley, Jolene			1/24/2020 13:09
DEF091204	DEF091213	ATTORNEYS' EYES ONLY	Bradley, Jolene			1/24/2020 16:31
DEF091214	DEF091222	ATTORNEYS' EYES ONLY	Bradley, Jolene			1/24/2020 13:56
DEF091223	DEF091224	ATTORNEYS' EYES ONLY	Paradise, Rebecca			12/14/2017 15:25

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Bates/ Control #	End Bates/ Control #	Confidentiality	Custodian	Date Created	Date Modified	Date Sent
DEF091225	DEF091227	ATTORNEYS' EYES ONLY	Paradise, Rebecca			12/14/2017 17:19
DEF091228	DEF091230	ATTORNEYS' EYES ONLY	Paradise, Rebecca			3/8/2018 11:38
DEF091231	DEF091233	ATTORNEYS' EYES ONLY	Paradise, Rebecca			3/8/2018 19:44
DEF091234	DEF091235	ATTORNEYS' EYES ONLY	Paradise, Rebecca			8/22/2018 13:02
DEF091236	DEF091237	ATTORNEYS' EYES ONLY	Paradise, Rebecca			9/14/2018 12:17
DEF091238	DEF091240	ATTORNEYS' EYES ONLY	Paradise, Rebecca			9/14/2018 10:11
DEF091241	DEF091246	ATTORNEYS' EYES ONLY	Paradise, Rebecca			9/14/2018 10:11
DEF091247	DEF091247	CONFIDENTIAL	Paradise, Rebecca	9/9/2015 14:17	9/14/2018	
DEF091248	DEF091248	CONFIDENTIAL	Paradise, Rebecca	9/4/2015 12:34	9/14/2018	
DEF091249	DEF091250	CONFIDENTIAL	Paradise, Rebecca	9/4/2015 9:56	9/14/2018	
DEF091251	DEF091252	CONFIDENTIAL	Paradise, Rebecca	2/5/2018 14:36	9/14/2018	
DEF091253	DEF091254	CONFIDENTIAL	Paradise, Rebecca	2/1/2018 10:14	9/14/2018	
DEF091255	DEF091256	CONFIDENTIAL	Paradise, Rebecca	2/1/2018 10:13	9/14/2018	
DEF091257	DEF091264	CONFIDENTIAL	Paradise, Rebecca	8/23/2018 7:53	8/23/2018	
DEF091265	DEF091273	ATTORNEYS' EYES ONLY	Paradise, Rebecca			9/14/2018 9:39
DEF091274	DEF091275	ATTORNEYS' EYES ONLY	Paradise, Rebecca			6/11/2014 11:43
DEF091276	DEF091281	ATTORNEYS' EYES ONLY	Paradise, Rebecca	6/3/2014 13:02	6/3/2014	
DEF091282	DEF091282	ATTORNEYS' EYES ONLY	Paradise, Rebecca			12/18/2018 16:45
DEF091283	DEF091285	ATTORNEYS' EYES ONLY	Paradise, Rebecca	7/27/2018 8:52	12/3/2018	
DEF091286	DEF091287	ATTORNEYS' EYES ONLY	Paradise, Rebecca	11/30/2018 13:43	12/3/2018	
DEF091288	DEF091288	ATTORNEYS' EYES ONLY	Paradise, Rebecca			8/2/2019 12:31
DEF091289	DEF091291	ATTORNEYS' EYES ONLY	Paradise, Rebecca	7/25/2019 17:58	7/25/2019	
DEF091292	DEF091293	ATTORNEYS' EYES ONLY	Paradise, Rebecca	11/30/2018 13:43	11/30/2018	

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Bates/ Control #	End Bates/ Control #	Confidentiality	Custodian	Date Created	Date Modified	Date Sent
DEF091294	DEF091295	ATTORNEYS' EYES ONLY	Paradise, Rebecca			11/15/2019 10:13
DEF091296	DEF091301	ATTORNEYS' EYES ONLY	Paradise, Rebecca			11/15/2019 9:48
DEF091302	DEF091303	ATTORNEYS' EYES ONLY	Paradise, Rebecca			3/18/2016 14:39
DEF091304	DEF091306	ATTORNEYS' EYES ONLY	Paradise, Rebecca			8/5/2016 8:44
DEF091307	DEF091308	ATTORNEYS' EYES ONLY	Paradise, Rebecca			12/12/2016 10:25
DEF091309	DEF091310	ATTORNEYS' EYES ONLY	Paradise, Rebecca			12/12/2016 10:55
DEF091311	DEF091313	ATTORNEYS' EYES ONLY	Peterson, Sarah			1/11/2016 9:54
DEF091314	DEF091314	ATTORNEYS' EYES ONLY	Peterson, Sarah			4/7/2016 10:14
DEF091315	DEF091324	ATTORNEYS' EYES ONLY	Peterson, Sarah	8/15/2012 9:50	4/7/2016	
DEF091325	DEF091326	ATTORNEYS' EYES ONLY	Peterson, Sarah			4/21/2016 11:13
DEF091327	DEF091329	ATTORNEYS' EYES ONLY	Peterson, Sarah			4/25/2016 14:37
DEF091330	DEF091332	ATTORNEYS' EYES ONLY	Peterson, Sarah			4/25/2016 15:03
DEF091333	DEF091335	ATTORNEYS' EYES ONLY	Peterson, Sarah			7/15/2016 9:10
DEF091336	DEF091340	ATTORNEYS' EYES ONLY	Peterson, Sarah			7/19/2016 8:53
DEF091341	DEF091344	ATTORNEYS' EYES ONLY	Peterson, Sarah			7/19/2016 6:33
DEF091345	DEF091351	ATTORNEYS' EYES ONLY	Peterson, Sarah			7/20/2016 13:28
DEF091352	DEF091356	ATTORNEYS' EYES ONLY	Peterson, Sarah			7/20/2016 10:34
DEF091357	DEF091362	ATTORNEYS' EYES ONLY	Peterson, Sarah			7/20/2016 11:30
DEF091363	DEF091368	ATTORNEYS' EYES ONLY	Peterson, Sarah			7/20/2016 11:26
DEF091369	DEF091378	ATTORNEYS' EYES ONLY	Peterson, Sarah			9/21/2016 12:55
DEF091379	DEF091380	CONFIDENTIAL	Peterson, Sarah	9/4/2015 9:56		
DEF091381	DEF091381	CONFIDENTIAL	Peterson, Sarah	9/4/2015 12:34		
DEF091382	DEF091382	CONFIDENTIAL	Peterson, Sarah	9/9/2015 14:17		

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Bates/ Control #	End Bates/ Control #	Confidentiality	Custodian	Date Created	Date Modified	Date Sent
DEF091383	DEF091393	ATTORNEYS' EYES ONLY	Peterson, Sarah			9/22/2016 13:14
DEF091394	DEF091403	ATTORNEYS' EYES ONLY	Peterson, Sarah			9/22/2016 13:04
DEF091404	DEF091405	CONFIDENTIAL	Peterson, Sarah	9/4/2015 9:56		
DEF091406	DEF091406	CONFIDENTIAL	Peterson, Sarah	9/4/2015 12:34		
DEF091407	DEF091407	CONFIDENTIAL	Peterson, Sarah	9/9/2015 14:17		
DEF091408	DEF091409	ATTORNEYS' EYES ONLY	Peterson, Sarah			9/26/2016 8:59
DEF091410	DEF091411	ATTORNEYS' EYES ONLY	Peterson, Sarah			9/14/2016 9:27
DEF091412	DEF091412	ATTORNEYS' EYES ONLY	Peterson, Sarah			8/16/2016 15:27
DEF091413	DEF091421	ATTORNEYS' EYES ONLY	Peterson, Sarah			9/14/2016 10:32
DEF091422	DEF091423	CONFIDENTIAL	Peterson, Sarah	9/4/2015 9:56		
DEF091424	DEF091424	CONFIDENTIAL	Peterson, Sarah	9/4/2015 12:34		
DEF091425	DEF091425	CONFIDENTIAL	Peterson, Sarah	9/9/2015 14:17		
DEF091426	DEF091426	ATTORNEYS' EYES ONLY	Peterson, Sarah	5/12/2014 15:28	9/10/2015	
DEF091427	DEF091427	ATTORNEYS' EYES ONLY	Peterson, Sarah	4/28/2016 13:08	4/29/2016	
DEF091428	DEF091429	ATTORNEYS' EYES ONLY	Peterson, Sarah			10/6/2016 12:59
DEF091430	DEF091432	ATTORNEYS' EYES ONLY	Peterson, Sarah			10/7/2016 19:59
DEF091433	DEF091437	ATTORNEYS' EYES ONLY	Peterson, Sarah			10/10/2016 10:30
DEF091438	DEF091441	ATTORNEYS' EYES ONLY	Peterson, Sarah			10/10/2016 9:52
DEF091442	DEF091449	ATTORNEYS' EYES ONLY	Peterson, Sarah			10/20/2016 8:06
DEF091450	DEF091455	ATTORNEYS' EYES ONLY	Peterson, Sarah			10/20/2016 12:40
DEF091456	DEF091461	ATTORNEYS' EYES ONLY	Peterson, Sarah			10/20/2016 13:32
DEF091462	DEF091466	ATTORNEYS' EYES ONLY	Peterson, Sarah			10/20/2016 10:36
DEF091467	DEF091470	ATTORNEYS' EYES ONLY	Peterson, Sarah			10/20/2016 10:06

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Bates/ Control #	End Bates/ Control #	Confidentiality	Custodian	Date Created	Date Modified	Date Sent
DEF091471	DEF091472	ATTORNEYS' EYES ONLY	Peterson, Sarah	8/31/2016 15:56	10/20/2016	
DEF091473	DEF091480	CONFIDENTIAL	Peterson, Sarah	9/1/2016 11:04	10/20/2016	
DEF091481	DEF091487	CONFIDENTIAL	Peterson, Sarah	9/1/2016 10:27	10/20/2016	
DEF091488	DEF091493	CONFIDENTIAL	Peterson, Sarah	9/1/2016 10:25	10/20/2016	
DEF091494	DEF091496	ATTORNEYS' EYES ONLY	Peterson, Sarah			10/20/2016 9:08
DEF091497	DEF091497	ATTORNEYS' EYES ONLY	Peterson, Sarah			10/18/2016 9:49
DEF091498	DEF091498	CONFIDENTIAL	Peterson, Sarah	10/18/2016 8:59	10/18/2016	
DEF091499	DEF091499	CONFIDENTIAL	Peterson, Sarah	10/18/2016 8:58	10/18/2016	
DEF091500	DEF091506	ATTORNEYS' EYES ONLY	Peterson, Sarah			10/25/2016 9:16
DEF091507	DEF091514	ATTORNEYS' EYES ONLY	Peterson, Sarah			10/27/2016 11:21
DEF091515	DEF091517	ATTORNEYS' EYES ONLY	Peterson, Sarah			11/18/2016 15:17
DEF091518	DEF091518	CONFIDENTIAL	Peterson, Sarah	10/12/2015 14:38		
DEF091519	DEF091519	CONFIDENTIAL	Peterson, Sarah	10/15/2015 9:58		
DEF091520	DEF091520	CONFIDENTIAL	Peterson, Sarah	10/15/2015 14:29		
DEF091521	DEF091524	ATTORNEYS' EYES ONLY	Peterson, Sarah			12/19/2016 16:23
DEF091525	DEF091527	ATTORNEYS' EYES ONLY	Peterson, Sarah			12/19/2016 15:32
DEF091528	DEF091528	ATTORNEYS' EYES ONLY	Peterson, Sarah			12/19/2016 13:23
DEF091529	DEF091531	ATTORNEYS' EYES ONLY	Peterson, Sarah			12/21/2016 10:13
DEF091532	DEF091533	ATTORNEYS' EYES ONLY	Peterson, Sarah			12/29/2016 11:53
DEF091534	DEF091536	ATTORNEYS' EYES ONLY	Peterson, Sarah			1/2/2017 20:53
DEF091537	DEF091539	ATTORNEYS' EYES ONLY	Peterson, Sarah			7/24/2017 9:42
DEF091540	DEF091542	ATTORNEYS' EYES ONLY	Peterson, Sarah			7/24/2017 9:47
DEF091543	DEF091547	ATTORNEYS' EYES ONLY	Peterson, Sarah			7/24/2017 10:09

Bates/ Control #	End Bates/ Control #	Confidentiality	Custodian	Date Created	Date Modified	Date Sent
DEF091548	DEF091549	ATTORNEYS' EYES ONLY	Peterson, Sarah			6/20/2018 20:33
DEF091550	DEF091553	ATTORNEYS' EYES ONLY	Peterson, Sarah			6/15/2018 10:27
DEF091554	DEF091561	ATTORNEYS' EYES ONLY	Peterson, Sarah	6/1/2018 11:03	6/1/2018	
DEF091562	DEF091568	ATTORNEYS' EYES ONLY	Peterson, Sarah			6/15/2018 12:25
DEF091569	DEF091569	ATTORNEYS' EYES ONLY	Peterson, Sarah			6/20/2018 9:03
DEF091570	DEF091579	ATTORNEYS' EYES ONLY	Peterson, Sarah	11/18/2016 10:33	6/20/2018	



# **EXHIBIT 11**

**(FILED UNDER SEAL)**

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# **EXHIBIT 11**

035906

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# EXHIBIT 12

035907

Row #	Document Set	End Bates	Document Set	Num Pages	Author	Date Sent	Subject	From	To	Cc	Confidentiality
1	DEF 79847-79910	DEF079848	18th Supplement	2	Bradley, Jolene M	5/29/2018 9:53	FW: Data iSight Reports ASO - April 2018	Bradley, Jolene M [jolene_bradley@uhc.com]	LaMaster, Lisa A [lisa.lamaster@uhc.com]; Lopez, Radames [radames_lopez_jr@uhc.com]		ATTORNEYS' EYE ONLY
2	DEF 79847-79910	DEF079849	18th Supplement	1	Gee, Matthew						ATTORNEYS' EYE ONLY
3	DEF 79847-79910	DEF079850	18th Supplement	1	Gee, Matthew						ATTORNEYS' EYE ONLY
4	DEF 79847-79910	DEF079851	18th Supplement	1	Gee, Matthew						ATTORNEYS' EYE ONLY
5	DEF 79847-79910	DEF079852	18th Supplement	1	Gee, Matthew						ATTORNEYS' EYE ONLY
6	DEF 79847-79910	DEF079853	18th Supplement	1	Gee, Matthew						ATTORNEYS' EYE ONLY

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Row #	Document Set	End Bates	Document Set	Num Pages	Author	Date Sent	Subject	From	To	Cc	Confidentiality
7	DEF 79847-79910	DEF079854	18th Supplement	1	Butler, Matthew	3/29/2018 8:28	Data iSight Reports ASO - February 2018	Butler, Matthew [matthew.butler@MultiPlan.com]	Paradise, Rebecca B [rebecca_paradise@uhc.com]; Peterson, Sarah R [sarah_r.peterson@uhc.com]; Larson, Carolyn S [carolyn_s_larson@uhc.com]; Bradley, Jolene M [jolene_bradley@uhc.com]	Butler, Matthew [matthew.butler@MultiPlan.com]; Emma.johnson@MultiPlan.com; Dominy, Susan [Susan.Dominy@MultiPlan.com]; Kienzle, Jacqueline [jacqueline.kienzle@MultiPlan.com]	ATTORNEYS' EYES ONLY
8	DEF 79847-79910	DEF079855	18th Supplement	1	Gee, Matthew						ATTORNEYS' EYES ONLY
9	DEF 79847-79910	DEF079856	18th Supplement	1	Gee, Matthew						ATTORNEYS' EYES ONLY
10	DEF 79847-79910	DEF079857	18th Supplement	1	Gee, Matthew						ATTORNEYS' EYES ONLY
11	DEF 79847-79910	DEF079858	18th Supplement	1	Gee, Matthew						ATTORNEYS' EYES ONLY

Row #	Document Set	End Bates	Document Set	Num Pages	Author	Date Sent	Subject	From	To	Cc	Confidentiality
12	DEF 79847-79910	DEF079859	18th Supplement	1	Gee, Matthew						ATTORNEYS' EYE ONLY
13	DEF 79847-79910	DEF079860	18th Supplement	1	Butler, Matthew	2/26/2018 14:18	Data iSight Reports ASO - January 2018	Butler, Matthew [matthew.butler@MultiPlan.com]	Paradise, Rebecca B [rebecca_paradise@uhc.com]; Peterson, Sarah R [sarah_r.peterson@uhc.com]; Larson, Carolyn S [carolyn_s_larson@uhc.com]; Bradley, Jolene M [jolene_bradley@uhc.com]; Logan, Angela M [angela_m_logan@uhc.com]; Lopez, Radames [radames_lopez_jr@uhc.com]; Olson, Patricia [patricia_olson@uhc.com]; Lermuseaux, David B [david_b_lermuseaux@uhc.com]; Bond, Wendy M [wendy_m_bond@uhc.com]; Mike, Crystal [crystal.mike@uhc.com]	Butler, Matthew [matthew.butler@MultiPlan.com]; Emma.johnson@Multiplan.com; Dominy, Susan [Susan.Dominy@multiplan.com]; Kienzle, Jacqueline [jacqueline.kienzle@MultiPlan.com]	ATTORNEYS' EYE ONLY
14	DEF 79847-79910	DEF079861	18th Supplement	1	Gee, Matthew						ATTORNEYS' EYE ONLY

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Row #	Document Set	End Bates	Document Set	Num Pages	Author	Date Sent	Subject	From	To	Cc	Confidentiality
15	DEF 79847-79910	DEF079862	18th Supplement	1	Gee, Matthew						ATTORNEYS' EYE ONLY
16	DEF 79847-79910	DEF079863	18th Supplement	1	Gee, Matthew						ATTORNEYS' EYE ONLY
17	DEF 79847-79910	DEF079864	18th Supplement	1	Gee, Matthew						ATTORNEYS' EYE ONLY
18	DEF 79847-79910	DEF079865	18th Supplement	1	Gee, Matthew						ATTORNEYS' EYE ONLY

Row #	Document Set	End Bates	Document Set	Num Pages	Author	Date Sent	Subject	From	To	Cc	Confidentiality
19	DEF 79847-79910	DEF079866	18th Supplement	1	Butler, Matthew	7/17/2018 12:38	Data iSight Reports ASO - June 2018	Butler, Matthew [matthew.butler@MultiPlan.com]	Paradise, Rebecca B [rebecca_paradise@uhc.com]; Peterson, Sarah R [sarah_r_peterson@uhc.com]; Larson, Carolyn S [carolyn_s_larson@uhc.com]; Bradley, Jolene M [jolene_bradley@uhc.com]; Lopez, Radames [radames_lopez_jr@uhc.com]; Olson, Patricia [patricia_olson@uhc.com]; Lermuseaux, David B [david_b_lermuseaux@uhc.com]; Bond, Wendy M [wendy_m_bond@uhc.com]; Mike, Crystal [crystal.mike@uhc.com]; Johnkins, Susan M [sue_johnkins@uhc.com]; LaMaster, Lisa A [lisa.lamaster@uhc.com]	Butler, Matthew [matthew.butler@MultiPlan.com]; Emma.johnson@MultiPlan.com; Dominy, Susan [Susan.Dominy@MultiPlan.com]; Kienzle, Jacqueline [jacqueline.kienzle@MultiPlan.com]; Edwards, Mark [MEDWARDS@MultiPlan.com]	ATTORNEYS' EYES ONLY
20	DEF 79847-79910	DEF079867	18th Supplement	1	Gee, Matthew						ATTORNEYS' EYES ONLY
21	DEF 79847-79910	DEF079868	18th Supplement	1	Gee, Matthew						ATTORNEYS' EYES ONLY

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Row #	Document Set	End Bates	Document Set	Num Pages	Author	Date Sent	Subject	From	To	Cc	Confidentiality
22	DEF 79847-79910	DEF079869	18th Supplement	1							ATTORNEYS' EYE ONLY
23	DEF 79847-79910	DEF079870	18th Supplement	1	Gee, Matthew						ATTORNEYS' EYE ONLY
24	DEF 79847-79910	DEF079871	18th Supplement	1	Gee, Matthew						ATTORNEYS' EYE ONLY



Row #	Document Set	End Bates	Document Set	Num Pages	Author	Date Sent	Subject	From	To	Cc	Confidentiality
25	DEF 79847-79910	DEF079872	18th Supplement	1	Butler, Matthew	4/30/2018 14:23	Data iSight Reports ASO - March 2018	Butler, Matthew [matthew.butler@MultiPlan.com]	Paradise, Rebecca B [rebecca_paradise@uhc.com]; Peterson, Sarah R [sarah_r_peterson@uhc.com]; Larson, Carolyn S [carolyn_s_larson@uhc.com]; Bradley, Jolene M [jolene_bradley@uhc.com]; Logan, Angela M [angela_m_logan@uhc.com]; Lopez, Radames [radames_lopez_jr@uhc.com]; Olson, Patricia [patricia_olson@uhc.com]; Lemuseaux, David B [david_b_lemuseaux@uhc.com]; Bond, Wendy M [wendy_m_bond@uhc.com]; Mike, Crystal [crystal.mike@uhc.com]	Butler, Matthew [matthew.butler@MultiPlan.com]; Emma.johnson@MultiPlan.com; Dominy, Susan [Susan.Dominy@MultiPlan.com]; Kienzle, Jacqueline [jacqueline.kienzle@MultiPlan.com]	ATTORNEYS' EYES ONLY
26	DEF 79847-79910	DEF079873	18th Supplement	1	Gee, Matthew						ATTORNEYS' EYES ONLY
27	DEF 79847-79910	DEF079874	18th Supplement	1	Gee, Matthew						ATTORNEYS' EYES ONLY

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Row #	Document Set	End Bates	Document Set	Num Pages	Author	Date Sent	Subject	From	To	Cc	Confidentiality
28	DEF 79847-79910	DEF079875	18th Supplement	1	Gee, Matthew						ATTORNEYS' EYE ONLY
29	DEF 79847-79910	DEF079876	18th Supplement	1	Gee, Matthew						ATTORNEYS' EYE ONLY
30	DEF 79847-79910	DEF079877	18th Supplement	1	Gee, Matthew						ATTORNEYS' EYE ONLY

Row #	Document Set	End Bates	Document Set	Num Pages	Author	Date Sent	Subject	From	To	Cc	Confidentiality
31	DEF 79847-79910	DEF079878	18th Supplement	1	Butler, Matthew	5/29/2018 8:40	Second Email Data iSight Reports Fully Insured - April 2018	Butler, Matthew [matthew.butler@MultiPlan.com]	Paradise, Rebecca B [rebecca_paradise@uhc.com]; Peterson, Sarah R [sarah_r.peterson@uhc.com]; Larson, Carolyn S [carolyn_s_larson@uhc.com]; Bradley, Jolene M [jolene_bradley@uhc.com]; Logan, Angela M [angela_m_logan@uhc.com]; Lopez, Radames [radames_lopez_jr@uhc.com]; Olson, Patricia [patricia_olson@uhc.com]; Lemuseaux, David B [david_b_lemuseaux@uhc.com]; Bond, Wendy M [wendy_m_bond@uhc.com]; Mike, Crystal [crystal.mike@uhc.com]	Butler, Matthew [matthew.butler@MultiPlan.com]; Dominy, Susan [Susan.Dominy@MultiPlan.com]; Emma Johnson [emma.johnson@MultiPlan.com]; Kienzie, Jacqueline [jacqueline.kienzie@MultiPlan.com]	ATTORNEYS' EYES ONLY
32	DEF 79847-79910	DEF079879	18th Supplement	1	Gee, Matthew						ATTORNEYS' EYES ONLY
33	DEF 79847-79910	DEF079880	18th Supplement	1	Gee, Matthew						ATTORNEYS' EYES ONLY

Row #	Document Set	End Bates	Document Set	Num Pages	Author	Date Sent	Subject	From	To	Cc	Confidentiality
34	DEF 79847-79910	DEF079881	18th Supplement	1	Butler, Matthew	1/24/2018 7:36	Second Email Data iSight Reports Fully Insured - December 2017	Butler, Matthew [matthew.butler@MultiPlan.com]	Paradise, Rebecca B [rebecca_paradise@uhc.com]; Peterson, Sarah R [sarah_r.peterson@uhc.com]; Larson, Carolyn S [carolyn_s_larson@uhc.com]; Bradley, Jolene M [jolene_bradley@uhc.com]; Logan, Angela M [angela_m_logan@uhc.com]; Lopez, Radames [radames_lopez_jr@uhc.com]; Olson, Patricia [patricia_olson@uhc.com]	Kienzle, Jacqueline [jacqueline.kienzle@MultiPlan.com]; Dominy, Susan [Susan.Dominy@multiplan.com]; Butler, Matthew [matthew.butler@MultiPlan.com]; Emma Johnson [emma.johnson@MultiPlan.com]	ATTORNEYS' EYES ONLY
35	DEF 79847-79910	DEF079882	18th Supplement	1	Gee, Matthew						ATTORNEYS' EYES ONLY
36	DEF 79847-79910	DEF079883	18th Supplement	1	Gee, Matthew						ATTORNEYS' EYES ONLY
37	DEF 79847-79910	DEF079884	18th Supplement	1	Butler, Matthew	3/29/2018 8:28	Second Email Data iSight Reports Fully Insured - February 2018	Butler, Matthew [matthew.butler@MultiPlan.com]	Paradise, Rebecca B [rebecca_paradise@uhc.com]; Peterson, Sarah R [sarah_r.peterson@uhc.com]; Larson, Carolyn S [carolyn_s_larson@uhc.com]; Bradley, Jolene M [jolene_bradley@uhc.com]	Butler, Matthew [matthew.butler@MultiPlan.com]; Dominy, Susan [Susan.Dominy@multiplan.com]; Emma Johnson [emma.johnson@MultiPlan.com]; Kienzle, Jacqueline [jacqueline.kienzle@MultiPlan.com]	ATTORNEYS' EYES ONLY
38	DEF 79847-79910	DEF079885	18th Supplement	1	Gee, Matthew						ATTORNEYS' EYES ONLY

Row #	Document Set	End Bates	Document Set	Num Pages	Author	Date Sent	Subject	From	To	Cc	Confidentiality
39	DEF 79847-79910	DEF079886	18th Supplement	1	Gee, Matthew						ATTORNEYS' EYE ONLY
40	DEF 79847-79910	DEF079887	18th Supplement	1	Butler, Matthew	4/30/2018 14:23	Second Email Data iSight Reports Fully Insured - March 2018	Butler, Matthew [matthew.butler@MultiPlan.com]	Paradise, Rebecca B [rebecca_paradise@uhc.com]; Peterson, Sarah R [sarah_r_peterson@uhc.com]; Larson, Carolyn S [carolyn_s_larson@uhc.com]; Bradley, Jolene M [jolene_bradley@uhc.com]; Logan, Angela M [angela_m_logan@uhc.com]; Lopez, Radames [radames_lopez_jr@uhc.com]; Olson, Patricia [patricia_olson@uhc.com]; Lemuseaux, David B [david_b_lemuseaux@uhc.com]; Bond, Wendy M [wendy_m_bond@uhc.com]; Mike, Crystal [crystal.mike@uhc.com]	Butler, Matthew [matthew.butler@MultiPlan.com]; Dominy, Susan [Susan.Dominy@multiplan.com]; Emma Johnson [emma.johnson@MultiPlan.com]; Kienzle, Jacqueline [jacqueline.kienzle@MultiPlan.com]	ATTORNEYS' EYE ONLY
41	DEF 79847-79910	DEF079888	18th Supplement	1	Gee, Matthew						ATTORNEYS' EYE ONLY
42	DEF 79847-79910	DEF079889	18th Supplement	1	Gee, Matthew						ATTORNEYS' EYE ONLY

035918

Row #	Document Set	End Bates	Document Set	Num Pages	Author	Date Sent	Subject	From	To	Cc	Confidentiality
43	DEF 79847-79910	DEF079890	18th Supplement	1	Butler, Matthew	6/19/2018 14:23	Second Email Data iSight Reports Fully Insured - May 2018	Butler, Matthew [matthew.butler@MultiPlan.com]	Paradise, Rebecca B [rebecca_paradise@uhc.com]; Peterson, Sarah R [sarah_r.peterson@uhc.com]; Larson, Carolyn S [carolyn_s_larson@uhc.com]; Bradley, Jolene M [jolene_bradley@uhc.com]	Butler, Matthew [matthew.butler@MultiPlan.com]; Dominy, Susan [Susan.Dominy@multiplan.com]; Emma.johnson@MultiPlan.com; Kienzle, Jacqueline [jacqueline.kienzle@MultiPlan.com]	ATTORNEYS' EYES ONLY
44	DEF 79847-79910	DEF079891	18th Supplement	1	Gee, Matthew						ATTORNEYS' EYES ONLY
45	DEF 79847-79910	DEF079892	18th Supplement	1	Gee, Matthew						ATTORNEYS' EYES ONLY

Row #	Document Set	End Bates	Document Set	Num Pages	Author	Date Sent	Subject	From	To	Cc	Confidentiality
46	DEF 79847-79910	DEF079893	18th Supplement	1	Butler, Matthew	9/8/2017 8:32	Data iSight Reports Fully Insured - August 2017	Butler, Matthew [matthew.butler@MultiPlan.com]	'Paradise, Rebecca B (rebecca_paradise@uhc.com)'; [rebecca_paradise@uhc.com]; 'Sarah R Peterson (sarah_r_peterson@uhc.com)'; [sarah_r_peterson@uhc.com]; 'Carolyn S Larson (carolyn_s_larson@uhc.com)'; [carolyn_s_larson@uhc.com]; 'Jolene Bradley (jolene_bradley@uhc.com)'; [jolene_bradley@uhc.com]; 'Logan, Angela M (angela_m_logan@uhc.com)'; [angela_m_logan@uhc.com]; Lopez, Radames (radames_lopez_jr@uhc.com) [radames_lopez_jr@uhc.com]; Olson, Patricia (patricia_olson@uhc.com)'	Kienzle, Jacqueline [jacqueline.kienzle@MultiPlan.com]; Dominy, Susan [Susan.Dominy@multiplan.com]; Butler, Matthew [matthew.butler@MultiPlan.com]; Johnson, Emma [emma.johnson@MultiPlan.com]	ATTORNEYS' EYES ONLY
47	DEF 79847-79910	DEF079894	18th Supplement	1	Gee, Matthew						ATTORNEYS' EYES ONLY
48	DEF 79847-79910	DEF079895	18th Supplement	1	Gee, Matthew						ATTORNEYS' EYES ONLY

Row #	Document Set	End Bates	Document Set	Num Pages	Author	Date Sent	Subject	From	To	Cc	Confidentiality
49	DEF 79847-79910	DEF079896	18th Supplement	1	Gee, Matthew						ATTORNEYS' EYE ONLY
50	DEF 79847-79910	DEF079897	18th Supplement	1	Gee, Matthew						ATTORNEYS' EYE ONLY
51	DEF 79847-79910	DEF079898	18th Supplement	1	Gee, Matthew						ATTORNEYS' EYE ONLY
52	DEF 79847-79910	DEF079899	18th Supplement	1	Butler, Matthew	9/8/2017 8:31	Data iSight Reports ASO - August 2017	Butler, Matthew [matthew.butler@MultiPlan.com]	'Paradise, Rebecca B (rebecca_paradise@uhc.com)'; [rebecca_paradise@uhc.com]'; Sarah R Peterson (sarah_r_peterson@uhc.com)'; [sarah_r_peterson@uhc.com]'; Carolyn S Larson (carolyn_s_larson@uhc.com)'	Kienzle, Jacqueline [jacqueline.kienzle@MultiPlan.com]; Dominy, Susan [Susan.Dominy@multiplan.com]; Butler, Matthew [matthew.butler@MultiPlan.com]; Johnson, Emma [emma.johnson@MultiPlan.com]	ATTORNEYS' EYE ONLY
53	DEF 79847-79910	DEF079900	18th Supplement	1	Gee, Matthew						ATTORNEYS' EYE ONLY



Row #	Document Set	End Bates	Document Set	Num Pages	Author	Date Sent	Subject	From	To	Cc	Confidentiality
54	DEF 79847-79910	DEF079901	18th Supplement	1	Gee, Matthew						ATTORNEYS' EYE ONLY
55	DEF 79847-79910	DEF079902	18th Supplement	1	Gee, Matthew						ATTORNEYS' EYE ONLY
56	DEF 79847-79910	DEF079903	18th Supplement	1	Gee, Matthew						ATTORNEYS' EYE ONLY
57	DEF 79847-79910	DEF079904	18th Supplement	1	Gee, Matthew						ATTORNEYS' EYE ONLY
58	DEF 79847-79910	DEF079905	18th Supplement	1	Butler, Matthew	10/17/2017 6:47	Data iSight Reports Fully Insured - September 2017	Butler, Matthew [matthew.butler@MultiPlan.com]	'Paradise, Rebecca B (rebecca_paradise@uhc.com)'; 'Jacqueline Kienzle (jacqueline.kienzle@MultiPlan.com)'; 'Sarah R Dominy, Susan Peterson (sarah_r_peterson@uhc.com)'; 'Matthew Butler, Matthew (matthew.butler@MultiPlan.com)'; 'Carolyn S Larson (carolyn_s_larson@uhc.com)'; 'Emma Johnson (emma.johnson@MultiPlan.com)'	Kienzle, Jacqueline [jacqueline.kienzle@MultiPlan.com]; Dominy, Susan [Susan.Dominy@MultiPlan.com]; Butler, Matthew [matthew.butler@MultiPlan.com]; Johnson, Emma [emma.johnson@MultiPlan.com]	ATTORNEYS' EYE ONLY

035922

Row #	Document Set	End Bates	Document Set	Num Pages	Author	Date Sent	Subject	From	To	Cc	Confidentiality
59	DEF 79847-79910	DEF079906	18th Supplement	1	Gee, Matthew						ATTORNEYS' EYE ONLY
60	DEF 79847-79910	DEF079907	18th Supplement	1	Gee, Matthew						ATTORNEYS' EYE ONLY
61	DEF 79847-79910	DEF079908	18th Supplement	1	Gee, Matthew						ATTORNEYS' EYE ONLY
62	DEF 79847-79910	DEF079909	18th Supplement	1	Gee, Matthew						ATTORNEYS' EYE ONLY
63	DEF 79847-79910	DEF079910	18th Supplement	1	Gee, Matthew						ATTORNEYS' EYE ONLY

035923

Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custodian
1	DEF090985	20th Supplement	DEF090985	Butler, Matthew	12/18/2017 11:09	Second Email Data iSight Reports Fully Insured - November 2017	Butler, Matthew [matthew.butler@MultiPlan.com]	Paradise, Rebecca B [rebecca_paradise@uhc.com]; Peterson, Sarah R [sarah_r_peterson@uhc.com]; Larson, Carolyn S [carolyn_s_larson@uhc.com]; Bradley, Jolene M [jolene_bradley@uhc.com]; Logan, Angela M [angela_m_logan@uhc.com]; Lopez, Radames [radames_lopez_jr@uhc.com]; Olson, Patricia [patricia_olson@uhc.com]		CONFIDENTIAL	Bradley, Jolene
2	DEF090986	20th Supplement	DEF090986	Gee, Matthew						ATTORNEYS' EYES ONLY	Bradley, Jolene

035924

Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custodian
3	DEF090987	20th Supplement	DEF090987	Gee, Matthew						ATTORNEYS' EYES ONLY	Bradley Jolene
4	DEF090988	20th Supplement	DEF090988	Butler, Matthew	12/18/2017 10:01	Data iSight Reports ASO - November 2017	Butler, Matthew [matthew.butler@MultiPlan.com]	Paradise, Rebecca B [rebecca_paradise@uhc.com]; Peterson, Sarah R [sarah_r.peterson@uhc.com]; Larson, Carolyn S [carolyn_s_larson@uhc.com]; Bradley, Jolene M [jolene_bradley@uhc.com]; Logan, Angela M [angela_m_logan@uhc.com]; Lopez, Radames [radames_lopez_jr@uhc.com]; Olson, Patricia [patricia_olson@uhc.com]	Kienzle, Jacqueline [jacqueline.kienzle@MultiPlan.com]; Dominy, Susan [Susan.Dominy@multiplan.com]; Butler, Matthew [matthew.butler@MultiPlan.com]; Emma Johnson@Multiplan.com	CONFIDENTIAL	Bradley Jolene

035925

Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custodian
5	DEF090989	20th Supplement	DEF090989	Gee, Matthew						ATTORNEYS' EYES ONLY	Bradley Jolene
6	DEF090990	20th Supplement	DEF090990	Gee, Matthew						ATTORNEYS' EYES ONLY	Bradley Jolene

035926

Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custodian
7	DEF090991	20th Supplement	DEF090991	Gee, Matthew						ATTORNEYS' EYES ONLY	Bradley Jolene
8	DEF090992	20th Supplement	DEF090992	Gee, Matthew						ATTORNEYS' EYES ONLY	Bradley Jolene

035927

Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custodian
9	DEF090993	20th Supplement	DEF090993	Gee, Matthew						ATTORNEYS' EYES ONLY	Bradley, Jolene
10	DEF090994	20th Supplement	DEF090994	Butler, Matthew	1/24/2018 7:32	Data iSight Reports ASO - December 2017	Butler, Matthew [matthew.butler@MultiPlan.com]	Paradise, Rebecca B [rebecca_paradise@uhc.com]; Peterson, Sarah R [sarah_r.peterson@uhc.com]; Larson, Carolyn S [carolyn_s_larson@uhc.com]; Bradley, Jolene M [jolene_bradley@uhc.com]; Logan, Angela M [angela_m_logan@uhc.com]; Lopez, Radames [radames_lopez_jr@uhc.com]; Olson, Patricia [patricia_olson@uhc.com]	Kienzle, Jacqueline [jacqueline.kienzle@MultiPlan.com]; Dominy, Susan [Susan.Dominy@multiplan.com]; Butler, Matthew [matthew.butler@MultiPlan.com]; Emma Johnson [emma.johnson@MultiPlan.com]	CONFIDENTIAL	Bradley, Jolene

035928

Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custodian
11	DEF090995	20th Supplement	DEF090995	Gee, Matthew						ATTORNEYS' EYES ONLY	Bradley Jolene
12	DEF090996	20th Supplement	DEF090996	Gee, Matthew						ATTORNEYS' EYES ONLY	Bradley Jolene
13	DEF090997	20th Supplement	DEF090997	Gee, Matthew						ATTORNEYS' EYES ONLY	Bradley Jolene



035929

Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custodian
14	DEF090998	20th Supplement	DEF090998	Gee, Matthew						ATTORNEYS' EYES ONLY	Bradley Jolene
15	DEF090999	20th Supplement	DEF090999	Gee, Matthew						ATTORNEYS' EYES ONLY	Bradley Jolene

Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custodian
16	DEF091000	20th Supplement	DEF091000	Butler, Matthew	8/17/2018 9:57	Data iSight Reports ASO - July 2018	Butler, Matthew [matthew.butler@MultiPlan.com]	Paradise, Rebecca B [rebecca_paradise@uhc.com];Larson, Carolyn S [carolyn_s_larson@uhc.com];Bradley, Jolene M [jolene_bradley@uhc.com];Lopez, Radames [radames_lopez_jr@uhc.com];Olson, Patricia [patricia_olson@uhc.com];Lermuseaux, David B [david_b_lemuseaux@uhc.com];Bond, Wendy M [wendy_m_bond@uhc.com];Mike, Crystal [crystal.mike@uhc.com];Johnkins, Susan M [sue_johnkins@uhc.com];LaMaster, Lisa A [lisa.lamaster@uhc.com]	Butler, Matthew [matthew.butler@MultiPlan.com];Dominy, Susan [Susan.Dominy@multiplan.com];Kienzle, Jacqueline [jacqueline.kienzle@MultiPlan.com];Edwards, Mark [MEDWARD.S@MultiPlan.com]	CONFIDENTIAL	Bradley, Jolene
17	DEF091001	20th Supplement	DEF091001	Gee, Matthew						ATTORNEYS' EYES ONLY	Bradley, Jolene

035931

Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custodian
18	DEF091002	20th Supplement	DEF091002	Gee, Matthew						ATTORNEYS' EYES ONLY	Bradley Jolene
19	DEF091003	20th Supplement	DEF091003	Gee, Matthew						ATTORNEYS' EYES ONLY	Bradley Jolene
20	DEF091004	20th Supplement	DEF091004	Gee, Matthew						ATTORNEYS' EYES ONLY	Bradley Jolene

035932

Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custodian
21	DEF091005	20th Supplement	DEF091005	Gee, Matthew						ATTORNEYS' EYES ONLY	Bradley Jolene
22	DEF091006	20th Supplement	DEF091006	Butler, Matthew	6/19/2018 14:23	Data iSight Reports ASO - May 2018	Butler, Matthew [matthew.butler@MultiPlan.com]	Paradise, Rebecca B [rebecca_paradise@uhc.com]; Peterson, Sarah R [sarah_r_peterson@uhc.com]; Larson, Carolyn S [carolyn_s_larson@uhc.com]; Bradley, Jolene M [jolene_bradley@uhc.com]; Lopez, Radames [radames_lopez_jr@uhc.com]; Olson, Patricia [patricia_olson@uhc.com]; Lermuseaux, David B [david_b_lemuseaux@uhc.com]; Bond, Wendy M [wendy_m_bond@uhc.com]; Mike, Crystal [crystal.mike@uhc.com]; Johnkins, Susan M [sue_johnkins@uhc.com]; LaMaster, Lisa A [lisa.lamaster@uhc.com]	Butler, Matthew [matthew.butler@MultiPlan.com]; Emma Johnson@MultiPlan.com; Dominicy, Susan [Susan.Dominicy@multiplan.com]; Kienzle, Jacqueline [jacqueline.kienzle@MultiPlan.com]	CONFIDENTIAL	Bradley Jolene

035933

Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custodian
23	DEF091007	20th Supplement	DEF091007	Gee, Matthew						ATTORNEYS' EYES ONLY	Bradley Jolene
24	DEF091008	20th Supplement	DEF091008	Gee, Matthew						ATTORNEYS' EYES ONLY	Bradley Jolene
25	DEF091009	20th Supplement	DEF091009	Gee, Matthew						ATTORNEYS' EYES ONLY	Bradley Jolene

035934

Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custodian
26	DEF091010	20th Supplement	DEF091010	Gee, Matthew						ATTORNEYS' EYES ONLY	Bradley Jolene
27	DEF091011	20th Supplement	DEF091011	Gee, Matthew						ATTORNEYS' EYES ONLY	Bradley Jolene

Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custodian
28	DEF091012	20th Supplement	DEF091012	Butler, Matthew	11/27/2017 10:04	Data iSight Reports ASO - October 2017	Butler, Matthew [matthew.butler@MultiPlan.com]	Paradise, Rebecca B [rebecca_paradise@uuhc.com]; Peterson, Sarah R [sarah_r_peterson@uuhc.com]; Larson, Carolyn S [carolyn_s_larson@uuhc.com]; Bradley, Jolene M [jolene_bradley@uuhc.com]; Logan, Angela M [angela_m_logan@uuhc.com]; Lopez, Radames [radames_lopez_jr@uuhc.com]; Olson, Patricia [patricia_olson@uuhc.com]	Kienzle, Jacqueline [jacqueline.kienzle@MultiPlan.com]; Dominy, Susan [Susan.Dominy@multiplan.com]; Butler, Matthew [matthew.butler@MultiPlan.com]; Emma, Johnson [emma.johnson@MultiPlan.com]	CONFIDENTIAL	Bradley, Jolene
29	DEF091013	20th Supplement	DEF091013	Gee, Matthew						ATTORNEYS' EYES ONLY	Bradley, Jolene

035936

Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custodian
30	DEF091014	20th Supplement	DEF091014	Gee, Matthew						ATTORNEYS' EYES ONLY	Bradley Jolene
31	DEF091015	20th Supplement	DEF091015	Gee, Matthew						ATTORNEYS' EYES ONLY	Bradley Jolene
32	DEF091016	20th Supplement	DEF091016	Gee, Matthew						ATTORNEYS' EYES ONLY	Bradley Jolene



Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custodian
33	DEF091017	20th Supplement	DEF091017	Gee, Matthew						ATTORNEYS' EYES ONLY	Bradley Jolene
34	DEF091018	20th Supplement	DEF091018	Butler, Matthew	2/26/2018 14:30	Second Email Data iSight Reports Fully Insured - January 2018	Butler, Matthew [matthew.butler@MultiPlan.com]	Paradise, Rebecca B [rebecca_paradise@uhc.com]; Peterson, Sarah R [sarah_r_peterson@uhc.com]; Larson, Carolyn S [carolyn_s_larson@uhc.com]; Bradley, Jolene M [jolene_bradley@uhc.com]; Logan, Angela M [angela_m_logan@uhc.com]; Lopez, Radames [radames_lopez_jr@uhc.com]; Olson, Patricia [patricia_olson@uhc.com]; Lermuseaux, David B [david_b_lemuseaux@uhc.com]; Bond, Wendy M [wendy_m_bond@uhc.com]; Mike, Crystal [crystal.mike@uhc.com]	Butler, Matthew [matthew.butler@MultiPlan.com]; Drominy, Susan [Susan.Drominy@MultiPlan.com]; Kienzle, Jacqueline [jacqueline.kienzle@MultiPlan.com]	CONFIDENTIAL	Bradley Jolene

035938

Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custod
35	DEF091019	20th Supplement	DEF091019	Gee, Matthew						ATTORNEYS' EYES ONLY	Bradley Jolene
36	DEF091020	20th Supplement	DEF091020	Gee, Matthew						ATTORNEYS' EYES ONLY	Bradley Jolene

Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custodian
37	DEF091021	20th Supplement	DEF091021	Butler, Matthew	8/17/2018 9:57	Second Email Data iSight Reports Fully Insured - July 2018	Butler, Matthew [matthew.butler@MultiPlan.com]	Paradise, Rebecca B [rebecca_paradise@uhc.com];Larson, Carolyn S [carolyn_s_larson@uhc.com];Bradley, Jolene M [jolene_bradley@uhc.com];Lopez, Radames [radames_lopez_jr@uhc.com];Olson, Patricia [patricia_olson@uhc.com];Lermuseaux, David B [david_b_lemuseaux@uhc.com];Bond, Wendy M [wendy_m_bond@uhc.com];Mike, Crystal [crystal.mike@uhc.com];Johnkins, Susan M [sue_johnkins@uhc.com]	Butler, Matthew [matthew.butler@MultiPlan.com];Dominy, Susan [Susan.Dominy@multiplan.com];Kienzle, Jacqueline [jacqueline.kienzle@MultiPlan.com];Edwards, Mark [MEDWARD.S@MultiPlan.com]	CONFIDENTIAL	Bradley, Jolene
38	DEF091022	20th Supplement	DEF091022	Gee, Matthew						ATTORNEYS' EYES ONLY	Bradley, Jolene

Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custodian
39	DEF091023	20th Supplement	DEF091023	Gee, Matthew						ATTORNEYS' EYES ONLY	Bradley Jolene
40	DEF091024	20th Supplement	DEF091024	Butler, Matthew	7/17/2018 12:39	Second Email Data iSight Reports Fully Insured - June 2018	Butler, Matthew [matthew.butler@MultiPlan.com]	Paradise, Rebecca B [rebecca_paradise@uhc.com]; Peterson, Sarah R [sarah_r.peterson@uhc.com]; Larson, Carolyn S [carolyn_s_larson@uhc.com]; Bradley, Jolene M [jolene_bradley@uhc.com]; Lopez, Radames [radames_lopez_jr@uhc.com]; Olson, Patricia [patricia_olson@uhc.com]; Lermuseaux, David B [david_b_lemuseaux@uhc.com]; Bond, Wendy M [wendy_m_bond@uhc.com]; Mike, Crystal [crystal.mike@uhc.com]; Johnkins, Susan M [sue_johnkins@uhc.com]	Butler, Matthew [matthew.butler@MultiPlan.com]; Drominy, Susan [Susan.Drominy@multiplan.com]; Emma Johnson [emma.johnson@Multiplan.com]; Kienzle, Jacqueline [jacqueline.kienzle@MultiPlan.com]; Edwards, Mark [MEDWARD@MultiPlan.com]	CONFIDENTIAL	Bradley Jolene

035941

Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custod
41	DEF091025	20th Supplement	DEF091025	Gee, Matthew						ATTORNEYS' EYES ONLY	Bradley Jolene
42	DEF091026	20th Supplement	DEF091026	Gee, Matthew						ATTORNEYS' EYES ONLY	Bradley Jolene

035942

Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custodian
43	DEF091027	20th Supplement	DEF091027	Butler, Matthew	10/17/2017 6:47	Data iSight Reports ASO - September 2017	Butler, Matthew [matthew.butler@MultiPlan.com]	'Paradise, Rebecca B (rebecca_paradise@u hc.com)'; [rebecca_paradise@u hc.com]; 'Sarah R Peterson (sarah_r_peterson@u hc.com)'; [sarah_r_peterson@u hc.com]; 'Carolyn S Larson (carolyn_s_larson@u hc.com)'; [carolyn_s_larson@u hc.com]; 'Jolene Bradley (jolene_bradley@u hc.com)'; [jolene_bradley@u hc.com]; 'Logan, Angela M (angela_m_logan@u hc.com)'; [angela_m_logan@u hc.com]; Lopez, Radames (radames_lopez_jr@u hc.com)'; [radames_lopez_jr@u hc.com]; Olson,	Kienzle, Jacqueline [jacqueline.kienzle@MultiPlan.com]; Dominy, Susan [Susan.Dominy@multiplan.com]; Butler, Matthew [matthew.butler@MultiPlan.com]; Johnson, Emma [emma.johnson@MultiPlan.com]	CONFIDENTIAL	Paradise, Rebecca
44	DEF091028	20th Supplement	DEF091028	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradise, Rebecca

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Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custodian
45	DEF091029	20th Supplement	DEF091029	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradis Rebec
46	DEF091030	20th Supplement	DEF091030	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradis Rebec
47	DEF091031	20th Supplement	DEF091031	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradis Rebec

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Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custodian
48	DEF091032	20th Supplement	DEF091032	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradise, Rebecca
49	DEF091033	20th Supplement	DEF091033	Butler, Matthew	9/19/2018 11:00	Second Email Data iSight Reports ASO - August 2018	Butler, Matthew [matthew.butler@MultiPlan.com]	'Paradise, Rebecca B (rebecca_paradise@uhc.com)'; [matthew.butler@MultiPlan.com]; Carolyn S Larson (carolyn_s_larson@uhc.com)'; [carolyn_s_larson@uhc.com]; Jolene Bradley (jolene_bradley@uhc.com)'; [jolene_bradley@uhc.com]; Lopez, Radames (radames_lopez_jr@uhc.com)'; [radames_lopez_jr@uhc.com]; Olson, Patricia (patricia_olson@uhc.com)'; [patricia_olson@uhc.com]; Lermuseaux, David B (david_b_lemuseaux@uhc.com)'; Bond, Wendy M (wendy_m_bond@uhc.com)'; [Susan.Dominy@multiplan.com]; Kienzle, Jacqueline (jacqueline.kienzle@MultiPlan.com); Edwards, Mark (MEDWARD_S@MultiPlan.com)'	Butler, Matthew [matthew.butler@MultiPlan.com]; Dominy, Susan [Susan.Dominy@multiplan.com]; Kienzle, Jacqueline (jacqueline.kienzle@MultiPlan.com); Edwards, Mark (MEDWARD_S@MultiPlan.com)'	CONFIDENTIAL	Paradise, Rebecca



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Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custodian
50	DEF091034	20th Supplement	DEF091034	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradis, Rebecca
51	DEF091035	20th Supplement	DEF091035	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradis, Rebecca

Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custodian
52	DEF091036	20th Supplement	DEF091036	Butler, Matthew	9/19/2018 11:00	Second Email Data iSight Reports Fully Insured - August 2018	Butler, Matthew [matthew.butler@MultiPlan.com]	'Paradise, Rebecca B (rebecca_paradise@uhc.com)'; [rebecca_paradise@uhc.com]; 'Carolyn S Larson (carolyn_s_larson@uhc.com)'; [carolyn_s_larson@uhc.com]; 'Jolene Bradley (jolene_bradley@uhc.com)'; [jolene_bradley@uhc.com]; 'Lopez, Radames (radames_lopez_jr@uhc.com)'; [radames_lopez_jr@uhc.com]; 'Olson, Patricia (patricia_olson@uhc.com)'; [patricia_olson@uhc.com]; 'Lermuseaux, David B (david_b_lemuseaux@uhc.com)'; Bond, Wendy M (wendy_m_bond@uhc.com)'; [wendy_m_bond@uhc.com]	Butler, Matthew [matthew.butler@MultiPlan.com]; Dominy, Susan [Susan.Dominy@multiplan.com]; Kienzle, Jacqueline [jacqueline.kienzle@MultiPlan.com]; Edwards, Mark [MEDWARD_S@MultiPlan.com]	CONFIDENTIAL	Paradise, Rebecca
53	DEF091037	20th Supplement	DEF091037	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradise, Rebecca

Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custodian
54	DEF091038	20th Supplement	DEF091038	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradise, Rebecca
55	DEF091039	20th Supplement	DEF091039	Butler, Matthew	10/23/2018 7:43	Second Email Data iSight Reports ASO - September 2018	Butler, Matthew [matthew.butler@MultiPlan.com]	'Paradise, Rebecca B (rebecca_paradise@uhc.com)'; [rebecca_paradise@uhc.com]; 'Carolyn S Larson (carolyn_s_larson@uhc.com)'; [carolyn_s_larson@uhc.com]; 'Jolene Bradley (jolene_bradley@uhc.com)'; [jolene_bradley@uhc.com]; Lopez, Radames (radames_lopez_jr@uhc.com)'; [radames_lopez_jr@uhc.com]; Olson, Patricia (patricia_olson@uhc.com)'; [patricia_olson@uhc.com]; Lermuseaux, David B (david_b_lemuseaux@uhc.com); Bond, Wendy M (wendy_m_bond@uhc.com)'; [david_b_lemuseaux@uhc.com]; [patricia_olson@uhc.com]; [wendy_m_bond@uhc.com]	Butler, Matthew [matthew.butler@MultiPlan.com]; Dominy, Susan [Susan.Dominy@multiplan.com]; Kienzle, Jacqueline [jacqueline.kienzle@MultiPlan.com]; Edwards, Mark [MEDWARD_S@MultiPlan.com]	CONFIDENTIAL	Paradise, Rebecca

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Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custodian
56	DEF091040	20th Supplement	DEF091040	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradis, Rebecca
57	DEF091041	20th Supplement	DEF091041	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradis, Rebecca

Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custodian
58	DEF091042	20th Supplement	DEF091042	Butler, Matthew	10/23/2018 7:43	Second Email Data iSight Reports Fully Insured - September 2018	Butler, Matthew [matthew.butler@MultiPlan.com]	'Paradise, Rebecca B (rebecca_paradise@uhc.com)'; [rebecca_paradise@uhc.com]; 'Carolyn S Larson (carolyn_s_larson@uhc.com)'; [carolyn_s_larson@uhc.com]; 'Jolene Bradley (jolene_bradley@uhc.com)'; [jolene_bradley@uhc.com]; 'Lopez, Radames (radames_lopez_jr@uhc.com)'; [radames_lopez_jr@uhc.com]; 'Olson, Patricia (patricia_olson@uhc.com)'; [patricia_olson@uhc.com]; 'Lermuseaux, David B (david_b_lemuseaux@uhc.com)'; 'Bond, Wendy M (wendy_m_bond@uhc.com)'; [wendy_m_bond@uhc.com]	Butler, Matthew [matthew.butler@MultiPlan.com]; 'Drominy, Susan (Susan.Drominy@multiplan.com)'; 'Kienzle, Jacqueline (jacqueline.kienzle@MultiPlan.com)'; 'Edwards, Mark (MEDWARD.S@MultiPlan.com)'; [MEDWARD.S@MultiPlan.com]	CONFIDENTIAL	Paradise, Rebecca
59	DEF091043	20th Supplement	DEF091043	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradise, Rebecca

Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custodian
60	DEF091044	20th Supplement	DEF091044	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradise, Rebecca
61	DEF091045	20th Supplement	DEF091045	Butler, Matthew	11/19/2018 10:33	Second Email Data iSight Reports ASO - October 2018	Butler, Matthew [matthew.butler@MultiPlan.com]	'Paradise, Rebecca B (rebecca_paradise@uhc.com)'; [rebecca_paradise@uhc.com]; 'Carolyn S Larson (carolyn_s_larson@uhc.com)'; [carolyn_s_larson@uhc.com]; 'Jolene Bradley (jolene_bradley@uhc.com)'; [jolene_bradley@uhc.com]; Lopez, Radames (radames_lopez_jr@uhc.com)'; [radames_lopez_jr@uhc.com]; Olson, Patricia (patricia_olson@uhc.com)'; [patricia_olson@uhc.com]; Lermuseaux, David B (david_b_lemuseaux@uhc.com)'; Bond, Wendy M (wendy_m_bond@uhc.com)'; [wendy_m_bond@uhc.com]	Butler, Matthew [matthew.butler@MultiPlan.com]; Dominini, Susan [Susan.Dominini@multiplan.com]; Kienzle, Jacqueline [jacqueline.kienzle@MultiPlan.com]; Edwards, Mark [MEDWARD_S@MultiPlan.com]	CONFIDENTIAL	Paradise, Rebecca

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Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custodian
62	DEF091046	20th Supplement	DEF091046	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradis, Rebecca
63	DEF091047	20th Supplement	DEF091047	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradis, Rebecca

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Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custodian
64	DEF091048	20th Supplement	DEF091048	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradise, Rebecca
65	DEF091049	20th Supplement	DEF091049	Butler, Matthew	11/19/2018 10:33	Second Email Data iSight Reports Fully Insured - October 2018	Butler, Matthew [matthew.butler@MultiPlan.com]	'Paradise, Rebecca B (rebecca_paradise@uhc.com)'; [matthew.butler@MultiPlan.com]; Carolyn S Larson (carolyn_s_larson@uhc.com)'; [carolyn_s_larson@uhc.com]; Jolene Bradley (jolene_bradley@uhc.com)'; [jolene_bradley@uhc.com]; Lopez, Radames (radames_lopez_jr@uhc.com)'; [radames_lopez_jr@uhc.com]; Olson, Patricia (patricia_olson@uhc.com)'; [patricia_olson@uhc.com]; Lermuseaux, David B (david_b_lermuseaux@uhc.com); Bond, Wendy M (wendy_m_bond@uhc.com)'; [wendy_m_bond@uhc.com]	Butler, Matthew [matthew.butler@MultiPlan.com]; Dominini, Susan [Susan.Dominini@multiplan.com]; Kienzle, Jacqueline [jacqueline.kienzle@MultiPlan.com]; Edwards, Mark [MEDWARD_S@MultiPlan.com]	CONFIDENTIAL	Paradise, Rebecca



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Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custodian
66	DEF091050	20th Supplement	DEF091050	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradis, Rebecca
67	DEF091051	20th Supplement	DEF091051	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradis, Rebecca

Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custodian
68	DEF091052	20th Supplement	DEF091052	Butler, Matthew	1/2/2019 13:47	Second Email Data iSight Reports ASO - November 2018	Butler, Matthew [matthew.butler@MultiPlan.com]	'Paradise, Rebecca B (rebecca_paradise@uhc.com)'; [rebecca_paradise@uhc.com]; 'Carolyn S Larson (carolyn_s_larson@uhc.com)' [carolyn_s_larson@uhc.com]; 'Jolene Bradley (jolene_bradley@uhc.com)' [jolene_bradley@uhc.com]; Lopez, Radames (radames_lopez_jr@uhc.com) [radames_lopez_jr@uhc.com]; Olson, Patricia (patricia_olson@uhc.com) [patricia_olson@uhc.com]; Lermuseaux, David B (david_b_lemuseaux@uhc.com); Bond, Wendy M (wendy_m_bond@uhc.com)	Butler, Matthew [matthew.butler@MultiPlan.com]; Drominy, Susan [Susan.Drominy@multiplan.com]; Kienzle, Jacqueline [jacqueline.kienzle@MultiPlan.com]; Edwards, Mark [MEDWARD_S@MultiPlan.com]	CONFIDENTIAL	Paradise, Rebecca
69	DEF091053	20th Supplement	DEF091053	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradise, Rebecca

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Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custodian
70	DEF091054	20th Supplement	DEF091054	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradis, Rebecca
71	DEF091055	20th Supplement	DEF091055	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradis, Rebecca

Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custodian
72	DEF091056	20th Supplement	DEF091056	Butler, Matthew	1/2/2019 13:47	Second Email Data iSight Reports Fully Insured - November 2018	Butler, Matthew [matthew.butler@MultiPlan.com]	'Paradise, Rebecca B (rebecca_paradise@uhc.com)'; [rebecca_paradise@uhc.com]; 'Carolyn S Larson (carolyn_s_larson@uhc.com)'; [carolyn_s_larson@uhc.com]; 'Jolene Bradley (jolene_bradley@uhc.com)'; [jolene_bradley@uhc.com]; 'Lopez, Radames (radames_lopez_jr@uhc.com)'; [radames_lopez_jr@uhc.com]; 'Olson, Patricia (patricia_olson@uhc.com)'; [patricia_olson@uhc.com]; 'Lermuseaux, David B (david_b_lemuseaux@uhc.com)'; Bond, Wendy M (wendy_m_bond@uhc.com)'	Butler, Matthew [matthew.butler@MultiPlan.com]; Drominy, Susan [Susan.Drominy@multiplan.com]; Kienzle, Jacqueline [jacqueline.kienzle@MultiPlan.com]; Edwards, Mark [MEDWARD_S@MultiPlan.com]	CONFIDENTIAL	Paradise, Rebecca
73	DEF091057	20th Supplement	DEF091057	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradise, Rebecca

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Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custodian
74	DEF091058	20th Supplement	DEF091058	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradis, Rebecca
75	DEF091059	20th Supplement	DEF091059	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradis, Rebecca

Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custodian
76	DEF091060	20th Supplement	DEF091060	Butler, Matthew	1/30/2019 8:27	First Email Data iSight Reports ASO - December 2018	Butler, Matthew [matthew.butler@MultiPlan.com]	'Paradise, Rebecca B (rebecca_paradise@uhc.com)'; [rebecca_paradise@uhc.com]; 'Carolyn S Larson (carolyn_s_larson@uhc.com)'; [carolyn_s_larson@uhc.com]; 'Jolene Bradley (jolene_bradley@uhc.com)'; [jolene_bradley@uhc.com]; Lopez, Radames (radames_lopez_jr@uhc.com)'; [radames_lopez_jr@uhc.com]; Olson, Patricia (patricia_olson@uhc.com)'; [patricia_olson@uhc.com]; Lermuseaux, David B (david_b_lermuseaux@uhc.com); Bond, Wendy M (wendy_m_bond@uhc.com)'; [wendy_m_bond@uhc.com]	Butler, Matthew [matthew.butler@MultiPlan.com]; Dominy, Susan [Susan.Dominy@multiplan.com]; Kienzle, Jacqueline [jacqueline.kienzle@MultiPlan.com]; Edwards, Mark [MEDWARD_S@MultiPlan.com]	CONFIDENTIAL	Paradise, Rebecca
77	DEF091061	20th Supplement	DEF091061	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradise, Rebecca

Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custodian
78	DEF091062	20th Supplement	DEF091062	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradise, Rebecca
79	DEF091063	20th Supplement	DEF091063	Butler, Matthew	1/30/2019 8:27	Second Email Data iSight Reports Fully Insured - December 2018	Butler, Matthew [matthew.butler@MultiPlan.com]	'Paradise, Rebecca B (rebecca_paradise@uhc.com)'; [matthew.butler@MultiPlan.com]; Carolyn S Larson (carolyn_s_larson@uhc.com)'; [carolyn_s_larson@uhc.com]; Jolene Bradley (jolene_bradley@uhc.com)'; [jolene_bradley@uhc.com]; Lopez, Radames (radames_lopez_jr@uhc.com)'; [radames_lopez_jr@uhc.com]; Olson, Patricia (patricia_olson@uhc.com)'; [patricia_olson@uhc.com]; Lermuseaux, David B (david_b_lermuseaux@uhc.com); Bond, Wendy M (wendy_m_bond@uhc.com)'; [wendy_m_bond@uhc.com]	Butler, Matthew [matthew.butler@MultiPlan.com]; Dominini, Susan [Susan.Dominini@multiplan.com]; Kienzle, Jacqueline [jacqueline.kienzle@MultiPlan.com]; Edwards, Mark [MEDWARDS@MultiPlan.com]	CONFIDENTIAL	Paradise, Rebecca

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Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custodian
80	DEF091064	20th Supplement	DEF091064	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradis, Rebecca
81	DEF091065	20th Supplement	DEF091065	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradis, Rebecca



Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custodian
82	DEF091066	20th Supplement	DEF091066	Edwards, Mark	6/14/2019 15:12	UHC Data iSight High Volume Appeal Reports	Edwards, Mark [MEDWARDS@MultiPlan.com]	LaMaster, Lisa A [lisa.lamaster@uhc.com];Becky Paradise (rebecca_paradise@uhc.com) [rebecca_paradise@uhc.com];Bradley, Jolene M [jolene_bradley@uhc.com];Ray Lopez (radames_lopez_jr@uhc.com) [radames_lopez_jr@uhc.com];Bond, Wendy M (wendy_m_bond@uhc.com) [wendy_m_bond@uhc.com]	Kienzle, Jacqueline [jacqueline.kienzle@MultiPlan.com];Dominy, Susan [Susan.Dominy@multiplan.com];Butler, Matthew [matthew.butler@MultiPlan.com]	ATTORNEYS' EYES ONLY	Paradise, Rebecca
83	DEF091067	20th Supplement	DEF091067	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradise, Rebecca

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Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custodian
84	DEF091068	20th Supplement	DEF091068	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradise, Rebecca
85	DEF091069	20th Supplement	DEF091069	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradise, Rebecca
86	DEF091070	20th Supplement	DEF091070	Kienzle, Jacqueline	3/8/2016 15:41	Data iSight For Fully Insured Claims Follow Up	Kienzle, Jacqueline [jacqueline.kienzle@MultiPlan.com]	Peterson, Sarah R [sarah_r.peterson@uuhc.com]	Haben, John M [john_m_haben@uuhc.com]; White, Dale [Dale.White@MultiPlan.com]; Brown-Stevenson, Tina L [tina.brown-stevenson@uuhc.com]; Paradise, Rebecca B [rebecca_b@uuhc.com]	ATTORNEYS' EYES ONLY	Paradise, Rebecca

Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custodian
87	DEF091071	20th Supplement	DEF091071	Johnson, Emma						ATTORNEYS' EYES ONLY	Paradise, Rebecca
88	DEF091072	20th Supplement	DEF091073	Johnson, Emma	9/22/2016 11:18	Data iSight Reports - August 2016	Johnson, Emma [emma.johnson@MultiPlan.com]	'Paradise, Rebecca B (rebecca_paradise@uhc.com)'; [rebecca_paradise@uhc.com]; 'Sarah R Peterson (sarah_r_peterson@uhc.com)'; [sarah_r_peterson@uhc.com]; 'Carolyn S Larson (carolyn_s_larson@uhc.com)'; [carolyn_s_larson@uhc.com]; 'Jolene Bradley (jolene_bradley@uhc.com)'; [jolene_bradley@uhc.com]; 'Logan, Angela M (angela_m_logan@uhc.com)'; [angela_m_logan@uhc.com]; Lopez, Radames (radames_lopez_jr@uhc.com)'; [radames_lopez_jr@uhc.com]; Olson,	Kienzle, Jacqueline [jacqueline.kienzle@MultiPlan.com]; Dominy, Susan [Susan.Dominy@multiplan.com]	CONFIDENTIAL	Paradise, Rebecca

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Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custodian
89	DEF091074	20th Supplement	DEF091074	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradis, Rebecca
90	DEF091075	20th Supplement	DEF091075	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradis, Rebecca
91	DEF091076	20th Supplement	DEF091076	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradis, Rebecca

Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custodian
92	DEF091077	20th Supplement	DEF091077	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradise, Rebecca
93	DEF091078	20th Supplement	DEF091079	Johnson, Emma	10/31/2016 20:00	Data iSight Reports - September 2016	Johnson, Emma [emma.johnson@MultiPlan.com]	'Paradise, Rebecca B (rebecca_paradise@uhc.com)'; [rebecca_paradise@uhc.com]; 'Sarah R Peterson (sarah_r_peterson@uhc.com)'; [sarah_r_peterson@uhc.com]; 'Carolyn S Larson (carolyn_s_larson@uhc.com)'; [carolyn_s_larson@uhc.com]; 'Jolene Bradley (jolene_bradley@uhc.com)'; [jolene_bradley@uhc.com]; 'Logan, Angela M (angela_m_logan@uhc.com)'; [angela_m_logan@uhc.com]; Lopez, Radames (radames_lopez_jr@uhc.com)'; [radames_lopez_jr@uhc.com]; Olson,	Kienzle, Jacqueline [jacqueline.kienzle@MultiPlan.com]; Dominy, Susan [Susan.Dominy@multiplan.com]; Butler, Matthew [matthew.butler@MultiPlan.com]	CONFIDENTIAL	Paradise, Rebecca

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Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custodian
94	DEF091080	20th Supplement	DEF091080	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradis Rebec
95	DEF091081	20th Supplement	DEF091081	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradis Rebec
96	DEF091082	20th Supplement	DEF091082	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradis Rebec

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Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custodian
97	DEF091083	20th Supplement	DEF091083	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradis, Rebecca
98	DEF091084	20th Supplement	DEF091084	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradis, Rebecca

Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custodian
99	DEF091085	20th Supplement	DEF091086	Johnson, Emma	11/28/2016 9:32	Data iSight Reports - October 2016	Johnson, Emma [emma.johnson@MultiPlan.com]	'Paradise, Rebecca B (rebecca_paradise@uhc.com)'; [rebecca_paradise@uhc.com]; 'Sarah R Peterson (sarah_r_peterson@uhc.com)'; [sarah_r_peterson@uhc.com]; 'Carolyn S Larson (carolyn_s_larson@uhc.com)'; [carolyn_s_larson@uhc.com]; 'Jolene Bradley (jolene_bradley@uhc.com)'; [jolene_bradley@uhc.com]; 'Logan, Angela M (angela_m_logan@uhc.com)'; [angela_m_logan@uhc.com]; Lopez, Radames (radames_lopez_jr@uhc.com)'; [radames_lopez_jr@uhc.com]; Olson,	Kienzle, Jacqueline [jacqueline.kienzle@MultiPlan.com]; Dominy, Susan [Susan.Dominy@multiplan.com]; Butler, Matthew [matthew.butler@MultiPlan.com]	CONFIDENTIAL	Paradise, Rebecca
100	DEF091087	20th Supplement	DEF091087	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradise, Rebecca



Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custodian
101	DEF091088	20th Supplement	DEF091088	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradis, Rebecca
102	DEF091089	20th Supplement	DEF091089	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradis, Rebecca
103	DEF091090	20th Supplement	DEF091090	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradis, Rebecca

Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custodian
104	DEF091091	20th Supplement	DEF091091	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradise, Rebecca
105	DEF091092	20th Supplement	DEF091093	Johnson, Emma	12/21/2016 12:13	Data iSight Reports - November 2016	Johnson, Emma [emma.johnson@MultiPlan.com]	'Paradise, Rebecca B (rebecca_paradise@uhc.com)' [rebecca_paradise@uhc.com]; 'Sarah R Peterson (sarah_r_peterson@uhc.com)' [sarah_r_peterson@uhc.com]; 'Carolyn S Larson (carolyn_s_larson@uhc.com)' [carolyn_s_larson@uhc.com]; 'Jolene Bradley (jolene_bradley@uhc.com)' [jolene_bradley@uhc.com]; 'Logan, Angela M (angela_m_logan@uhc.com)' [angela_m_logan@uhc.com]; Lopez, Radames (radames_lopez_jr@uhc.com) [radames_lopez_jr@uhc.com]; Olson,	Kienzle, Jacqueline [jacqueline.kienzle@MultiPlan.com]; Dominy, Susan [Susan.Dominy@MultiPlan.com]; Butler, Matthew [matthew.butler@MultiPlan.com]	CONFIDENTIAL	Paradise, Rebecca

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Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custodian
106	DEF091094	20th Supplement	DEF091094	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradis, Rebecca
107	DEF091095	20th Supplement	DEF091095	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradis, Rebecca
108	DEF091096	20th Supplement	DEF091096	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradis, Rebecca

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Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custodian
109	DEF091097	20th Supplement	DEF091097	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradis, Rebecca
110	DEF091098	20th Supplement	DEF091098	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradis, Rebecca

Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custodian
111	DEF091099	20th Supplement	DEF091100	Johnson, Emma	1/18/2017 11:56	Data iSight Reports - December 2016	Johnson, Emma [emma.johnson@MultiPlan.com]	'Paradise, Rebecca B (rebecca_paradise@uhc.com)'; [rebecca_paradise@uhc.com]; 'Sarah R Peterson (sarah_r_peterson@uhc.com)'; [sarah_r_peterson@uhc.com]; 'Carolyn S Larson (carolyn_s_larson@uhc.com)'; [carolyn_s_larson@uhc.com]; 'Jolene Bradley (jolene_bradley@uhc.com)'; [jolene_bradley@uhc.com]; 'Logan, Angela M (angela_m_logan@uhc.com)'; [angela_m_logan@uhc.com]; Lopez, Radames (radames_lopez_jr@uhc.com)'; [radames_lopez_jr@uhc.com]; Olson,	Kienzle, Jacqueline [jacqueline.kienzle@MultiPlan.com]; Dominy, Susan [Susan.Dominy@multiplan.com]; Butler, Matthew [matthew.butler@MultiPlan.com]	CONFIDENTIAL	Paradise, Rebecca
112	DEF091101	20th Supplement	DEF091101	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradise, Rebecca

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Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custodian
113	DEF091102	20th Supplement	DEF091102	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradis Rebec
114	DEF091103	20th Supplement	DEF091103	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradis Rebec
115	DEF091104	20th Supplement	DEF091104	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradis Rebec

Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custodian
116	DEF091105	20th Supplement	DEF091105	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradise, Rebecca
117	DEF091106	20th Supplement	DEF091107	Johnson, Emma	2/7/2017 14:17	Data iSight Reports Fully Insured - January 2017	Johnson, Emma [emma.johnson@MultiPlan.com]	'Paradise, Rebecca B (rebecca_paradise@uhc.com)'; [rebecca_paradise@uhc.com]; 'Sarah R Peterson (sarah_r_peterson@uhc.com)'; [sarah_r_peterson@uhc.com]; 'Carolyn S Larson (carolyn_s_larson@uhc.com)'; [carolyn_s_larson@uhc.com]; 'Jolene Bradley (jolene_bradley@uhc.com)'; [jolene_bradley@uhc.com]; 'Logan, Angela M (angela_m_logan@uhc.com)'; [angela_m_logan@uhc.com]; 'Lopez, Radames (radames_lopez_jr@uhc.com)'; [radames_lopez_jr@uhc.com]; Olson,	Kienzle, Jacqueline [jacqueline.kienzle@MultiPlan.com]; Dominy, Susan [Susan.Dominy@multiplan.com]; Butler, Matthew [matthew.butler@MultiPlan.com]	CONFIDENTIAL	Paradise, Rebecca

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Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custodian
118	DEF091108	20th Supplement	DEF091108	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradis Rebec
119	DEF091109	20th Supplement	DEF091109	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradis Rebec
120	DEF091110	20th Supplement	DEF091110	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradis Rebec



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Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custodian
121	DEF091111	20th Supplement	DEF091111	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradis, Rebecca
122	DEF091112	20th Supplement	DEF091112	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradis, Rebecca

Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custodian
123	DEF091113	20th Supplement	DEF091113	Johnson, Emma	3/23/2017 11:53	Data iSight Reports Fully Insured - February 2017	Johnson, Emma [emma.johnson@MultiPlan.com]	'Paradise, Rebecca B (rebecca_paradise@uhc.com)'; [rebecca_paradise@uhc.com]; 'Sarah R Peterson (sarah_r_peterson@uhc.com)'; [sarah_r_peterson@uhc.com]; 'Carolyn S Larson (carolyn_s_larson@uhc.com)'; [carolyn_s_larson@uhc.com]; 'Jolene Bradley (jolene_bradley@uhc.com)'; [jolene_bradley@uhc.com]; 'Logan, Angela M (angela_m_logan@uhc.com)'; [angela_m_logan@uhc.com]; 'Lopez, Radames (radames_lopez_jr@uhc.com)'; [radames_lopez_jr@uhc.com]; Olson,	Kienzle, Jacqueline [jacqueline.kienzle@MultiPlan.com]; Dominy, Susan [Susan.Dominy@multiplan.com]; Butler, Matthew [matthew.butler@MultiPlan.com]	CONFIDENTIAL	Paradise, Rebecca
124	DEF091114	20th Supplement	DEF091114	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradise, Rebecca

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Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custodian
125	DEF091115	20th Supplement	DEF091115	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradis, Rebecca
126	DEF091116	20th Supplement	DEF091116	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradis, Rebecca
127	DEF091117	20th Supplement	DEF091117	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradis, Rebecca

Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custodian
128	DEF091118	20th Supplement	DEF091118	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradise, Rebecca
129	DEF091119	20th Supplement	DEF091120	Johnson, Emma	3/23/2017 11:54	Data iSight Reports ASO - February 2017	Johnson, Emma [emma.johnson@MultiPlan.com]	'Paradise, Rebecca B (rebecca_paradise@uhc.com)'; [emma.johnson@MultiPlan.com]; 'Sarah R Peterson (sarah_r.peterson@uhc.com)'; [sarah_r.peterson@uhc.com]; 'Carolyn S Larson (carolyn_s_larson@uhc.com)'; [carolyn_s_larson@uhc.com]; 'Jolene Bradley (jolene_bradley@uhc.com)'; [jolene_bradley@uhc.com]; 'Logan, Angela M (angela_m_logan@uhc.com)'; [angela_m_logan@uhc.com]; Lopez, Radames (radames_lopez_jr@uhc.com)'; [radames_lopez_jr@uhc.com]; Olson,	Kienzle, Jacqueline [jacqueline.kienzle@MultiPlan.com]; Dominy, Susan [Susan.Dominy@MultiPlan.com]; Butler, Matthew [matthew.butler@MultiPlan.com]	CONFIDENTIAL	Paradise, Rebecca

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Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custodian
130	DEF091121	20th Supplement	DEF091121	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradis, Rebecca
131	DEF091122	20th Supplement	DEF091122	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradis, Rebecca
132	DEF091123	20th Supplement	DEF091123	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradis, Rebecca

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Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custodian
133	DEF091124	20th Supplement	DEF091124	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradis, Rebecca
134	DEF091125	20th Supplement	DEF091125	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradis, Rebecca

Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custodian
135	DEF091126	20th Supplement	DEF091126	Butler, Matthew	4/17/2017 13:46	Data iSight Reports Fully Insured - March 2017	Butler, Matthew [matthew.butler@MultiPlan.com]	'Paradise, Rebecca B (rebecca_paradise@u hc.com)' [rebecca_paradise@u hc.com]; 'Sarah R Peterson (sarah_r_peterson@u hc.com)' [sarah_r_peterson@u hc.com]; 'Carolyn S Larson (carolyn_s_larson@u hc.com)' [carolyn_s_larson@u hc.com]; 'Jolene Bradley (jolene_bradley@u hc.com)' [jolene_bradley@u hc.com]; 'Logan, Angela M (angela_m_logan@u hc.com)' [angela_m_logan@u hc.com]; Lopez, Radames (radames_lopez_jr@u hc.com) [radames_lopez_jr@u hc.com]; Olson,	Kienzle, Jacqueline [jacqueline.kienzle@MultiPlan.com]; Dominy, Susan [Susan.Dominy@multiplan.com]; Butler, Matthew [matthew.butler@MultiPlan.com]; Johnson, Emma [emma.johnson@MultiPlan.com]	CONFIDENTIAL	Paradise, Rebecca
136	DEF091127	20th Supplement	DEF091127	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradise, Rebecca

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Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custodian
137	DEF091128	20th Supplement	DEF091128	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradis Rebec
138	DEF091129	20th Supplement	DEF091129	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradis Rebec
139	DEF091130	20th Supplement	DEF091130	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradis Rebec



Row #	Bates	Document Set	End Bates	Author	Date Sent	Subject	From	To	Cc	Confidentiality	Custodian
140	DEF091131	20th Supplement	DEF091131	Gee, Matthew						ATTORNEYS' EYES ONLY	Paradis, Rebecca

Row #	Bates	Document Set	End Bates	Author	Begin Family	Date Sent	Subject	From	To	Cc
1	DEF097742	United's 25th supplement (DEF097742-DEF097859)	DEF097743	Bradley, Jolene M	DEF097742	5/29/2018 9:53	FW: Data iSight Reports ASO - April 2018	Bradley, Jolene M [jolene_bradley@uhc.com]	LaMaster, Lisa A [lisa.lamaster@uhc.com]; Lopez, Radames [radames_lopez_jr@uhc.com]	
2	DEF097744	United's 25th supplement (DEF097742-DEF097859)	DEF097744	Gee, Matthew	DEF097742					
3	DEF097745	United's 25th supplement (DEF097742-DEF097859)	DEF097745	Gee, Matthew	DEF097742					
4	DEF097746	United's 25th supplement	DEF097746	Gee, Matthew	DEF097742					
5	DEF097747	United's 25th supplement	DEF097747	Gee, Matthew	DEF097742					
6	DEF097748	United's 25th supplement	DEF097748	Gee, Matthew	DEF097742					
7	DEF097749	United's 25th supplement (DEF097742-DEF097859)	DEF097749	Butler, Matthew	DEF097749	3/29/2018 8:28	Data iSight Reports ASO - February 2018	Butler, Matthew [matthew.butler@MultiPlan.com]	Paradise, Rebecca B [rebecca_paradise@uhc.com]; Peterson, Sarah R [sarah_r.peterson@uhc.com]; Larson, Carolyn S [carolyn_s_larson@uhc.com]; Bradley, Jolene M [jolene_bradley@uhc.com]; Logan, Angela M [angela_m_logan@uhc.com]; Lopez, Radames [radames_lopez_jr@uhc.com]; Olson, Patricia [patricia_olson@uhc.com]; Lermuseaux, David B [david_b_lermuseaux@uhc.com]; Bond, Wendy M [wendy_m_bond@uhc.com]; Mike, Crystal [crystal.mike@uhc.com]	Butler, Matthew [matthew.butler@MultiPlan.com]; Emma.johnson@Multiplan.com; Doran, Susan [Susan.Dominy@multiplan.com]; Kienzle, Jacqueline [jacqueline.kienzle@MultiPlan.com]
8	DEF097750	United's 25th supplement	DEF097750	Gee, Matthew	DEF097749					
9	DEF097751	United's 25th supplement	DEF097751	Gee, Matthew	DEF097749					
10	DEF097752	United's 25th supplement	DEF097752	Gee, Matthew	DEF097749					
11	DEF097753	United's 25th supplement	DEF097753	Gee, Matthew	DEF097749					
12	DEF097754	United's 25th supplement	DEF097754	Gee, Matthew	DEF097749					

Row #	Bates	Document Set	End Bates	Author	Begin Family	Date Sent	Subject	From	To	Cc
13	DEF097755	United's 25th supplement (DEF097742-DEF097859)	DEF097755	Butler, Matthew	DEF097755	2/26/2018 14:18	Data iSight Reports ASO - January 2018	Butler, Matthew [matthew.butler@MultiPlan.com]	Paradise, Rebecca B [rebecca_paradise@uhc.com]; Peterson, Sarah R [sarah_r_peterson@uhc.com]; Larson, Carolyn S [carolyn_s_larson@uhc.com]; Bradley, Jolene M [jolene_bradley@uhc.com]; Logan, Angela M [angela_m_logan@uhc.com]; Lopez, Radames	Butler, Matthew [matthew.butler@MultiPlan.com]; Emma.john@Multiplan.com; Dominy, Susan [Susan.Dominy@Multiplan.com]; Kienzle, Jacqueline [jacqueline.kienzle@MultiPlan.com]
14	DEF097756	United's 25th supplement	DEF097756	Gee, Matthew	DEF097755					
15	DEF097757	United's 25th supplement	DEF097757	Gee, Matthew	DEF097755					
16	DEF097758	United's 25th supplement	DEF097758	Gee, Matthew	DEF097755					
17	DEF097759	United's 25th supplement	DEF097759	Gee, Matthew	DEF097755					
18	DEF097760	United's 25th supplement	DEF097760	Gee, Matthew	DEF097755					
19	DEF097761	United's 25th supplement (DEF097742-DEF097859)	DEF097761	Butler, Matthew	DEF097761	7/17/2018 12:38	Data iSight Reports ASO - June 2018	Butler, Matthew [matthew.butler@MultiPlan.com]	Paradise, Rebecca B [rebecca_paradise@uhc.com]; Peterson, Sarah R [sarah_r_peterson@uhc.com]; Larson, Carolyn S [carolyn_s_larson@uhc.com]; Bradley, Jolene M [jolene_bradley@uhc.com]; Lopez, Radames [radames_lopez_jr@uhc.com]; Olson, Patricia [patricia_olson@uhc.com]; Lermuseaux, David B [david_b_lermuseaux@uhc.com]; Bond, Wendy M [wendy_m_bond@uhc.com]; Mike, Crystal [crystal.mike@uhc.com]; Johnkins, Susan M [sue_johnkins@uhc.com]; Lamaster, Lisa A [lisa.lamaster@uhc.com]	Butler, Matthew [matthew.butler@MultiPlan.com]; Emma.john@Multiplan.com; Dominy, Susan [Susan.Dominy@Multiplan.com]; Kienzle, Jacqueline [jacqueline.kienzle@MultiPlan.com]; Edwards, Mark [MEDWARDS@MultiPlan.com]
20	DEF097762	United's 25th supplement	DEF097762	Gee, Matthew	DEF097761					
21	DEF097763	United's 25th supplement	DEF097763	Gee, Matthew	DEF097761					
22	DEF097764	United's 25th supplement	DEF097764		DEF097761					
23	DEF097765	United's 25th supplement	DEF097765	Gee, Matthew	DEF097761					
24	DEF097766	United's 25th supplement	DEF097766	Gee, Matthew	DEF097761					

Row #	Bates	Document Set	End Bates	Author	Begin Family	Date Sent	Subject	From	To	Cc
25	DEF097767	United's 25th supplement (DEF097742-DEF097859)	DEF097767	Butler, Matthew	DEF097767	4/30/2018 14:23	Data iSight Reports ASO - March 2018	Butler, Matthew [matthew.butler@MultiPlan.com]	Paradise, Rebecca B [rebecca_paradise@uhc.com]; Peterson, Sarah R [sarah_r_peterson@uhc.com]; Larson, Carolyn S [carolyn_s_larson@uhc.com]; Bradley, Jolene M [jolene_bradley@uhc.com]; Logan, Angela M [angela_m_logan@uhc.com]; Lopez, Radames [radames_lopez_jr@uhc.com]; Olson, Patricia [patricia_olson@uhc.com]; Lermuseaux, David B [david_b_lemuseaux@uhc.com]; Bond, Wendy M [wendy_m_bond@uhc.com]; Mike, Crystal [crystal.mike@uhc.com]	Butler, Matthew [matthew.butler@MultiPlan.com]; Emma.john@Multiplan.com; Dominy, Susan [Susan.Dominy@multiplan.com]; Kienzle, Jacqueline [jacqueline.kienzle@MultiPlan.com]
26	DEF097768	United's 25th supplement	DEF097768	Gee, Matthew	DEF097767					
27	DEF097769	United's 25th supplement	DEF097769	Gee, Matthew	DEF097767					
28	DEF097770	United's 25th supplement	DEF097770	Gee, Matthew	DEF097767					
29	DEF097771	United's 25th supplement	DEF097771	Gee, Matthew	DEF097767					
30	DEF097772	United's 25th supplement	DEF097772	Gee, Matthew	DEF097767					
31	DEF097773	United's 25th supplement (DEF097742-DEF097859)	DEF097773	Butler, Matthew	DEF097773	5/29/2018 8:40	Second Email Data iSight Reports Fully Insured - April 2018	Butler, Matthew [matthew.butler@MultiPlan.com]	Paradise, Rebecca B [rebecca_paradise@uhc.com]; Peterson, Sarah R [sarah_r_peterson@uhc.com]; Larson, Carolyn S [carolyn_s_larson@uhc.com]; Bradley, Jolene M [jolene_bradley@uhc.com]; Logan, Angela M [angela_m_logan@uhc.com]; Lopez, Radames [radames_lopez_jr@uhc.com]; Olson, Patricia [patricia_olson@uhc.com]; Lermuseaux, David B [david_b_lemuseaux@uhc.com]; Bond, Wendy M [wendy_m_bond@uhc.com]; Mike, Crystal [crystal.mike@uhc.com]	Butler, Matthew [matthew.butler@MultiPlan.com]; Dominy, Susan [Susan.Dominy@multiplan.com]; Emma.john@Multiplan.com; Kienzle, Jacqueline [jacqueline.kienzle@MultiPlan.com]
32	DEF097774	United's 25th supplement	DEF097774	Gee, Matthew	DEF097773					

Row #	Bates	Document Set	End Bates	Author	Begin Family	Date Sent	Subject	From	To	Cc
33	DEF097775	United's 25th supplement	DEF097775	Gee, Matthew	DEF097773					
34	DEF097776	United's 25th supplement (DEF097742-DEF097859)	DEF097776	Butler, Matthew	DEF097776	1/24/2018 7:36	Second Email Data iSight Reports Fully Insured - December 2017	Butler, Matthew [matthew.butler@MultiPlan.com]	Paradise, Rebecca B [rebecca_paradise@uhc.com]; Peterson, Sarah R [sarah_r_peterson@uhc.com]; Larson, Carolyn S [carolyn_s_larson@uhc.com]; Bradley, Jolene M [jolene_bradley@uhc.com]; Logan, Angela M [angela_m_logan@uhc.com]; Lopez, Radames [radames_lopez_jr@uhc.com]; Olson, Patricia [patricia_olson@uhc.com]	Kienzle, Jacqueline [jacqueline.kienzle@MultiPlan.com]; Dominy, Susan [Susan.Dominy@MultiPlan.com]; Butler, Matthew [matthew.butler@MultiPlan.com]; Emma Johnson [emma.johnson@MultiPlan.com]
35	DEF097777	United's 25th supplement	DEF097777	Gee, Matthew	DEF097776					
36	DEF097778	United's 25th supplement	DEF097778	Gee, Matthew	DEF097776					
37	DEF097779	United's 25th supplement (DEF097742-DEF097859)	DEF097779	Butler, Matthew	DEF097779	3/29/2018 8:28	Second Email Data iSight Reports Fully Insured - February 2018	Butler, Matthew [matthew.butler@MultiPlan.com]	Paradise, Rebecca B [rebecca_paradise@uhc.com]; Peterson, Sarah R [sarah_r_peterson@uhc.com]; Larson, Carolyn S [carolyn_s_larson@uhc.com]; Bradley, Jolene M [jolene_bradley@uhc.com]; Logan, Angela M [angela_m_logan@uhc.com]; Lopez, Radames [radames_lopez_jr@uhc.com]; Olson, Patricia [patricia_olson@uhc.com]; Lermuseaux, David B [david_b_lemuseaux@uhc.com]; Bond, Wendy M [wendy_m_bond@uhc.com]; Mike, Crystal [crystal.mike@uhc.com]	Butler, Matthew [matthew.butler@MultiPlan.com]; Dominy, Susan [Susan.Dominy@MultiPlan.com]; Emma Johnson [emma.johnson@MultiPlan.com]; Kienzle, Jacqueline [jacqueline.kienzle@MultiPlan.com]
38	DEF097780	United's 25th supplement	DEF097780	Gee, Matthew	DEF097779					
39	DEF097781	United's 25th supplement	DEF097781	Gee, Matthew	DEF097779					

Row #	Bates	Document Set	End Bates	Author	Begin Family	Date Sent	Subject	From	To	Cc
40	DEF097782	United's 25th supplement (DEF097742-DEF097859)	DEF097782	Butler, Matthew	DEF097782	4/30/2018 14:23	Second Email Data iSight Reports Fully Insured - March 2018	Butler, Matthew [matthew.butler@MultiPlan.com]	Paradise, Rebecca B [rebecca_paradise@uhc.com]; Peterson, Sarah R [sarah_r_peterson@uhc.com]; Larson, Carolyn S [carolyn_s_larson@uhc.com]; Bradley, Jolene M [jolene_bradley@uhc.com]; Logan, Angela M [angela_m_logan@uhc.com]; Lopez, Radames [radames_lopez_jr@uhc.com]; Olson, Patricia [patricia_olson@uhc.com]; Lermuseaux, David B [david_b_lermuseaux@uhc.com]; Bond, Wendy M [wendy_m_bond@uhc.com]; Mike, Crystal [crystal.mike@uhc.com]	Butler, Matthew [matthew.butler@MultiPlan.com]; Dominy, Susan [Susan.Dominy@MultiPlan.com]; Emma.johnson@Multiplan.com; Kienzle, Jacqueline [jacqueline.kienzle@MultiPlan.com]
41	DEF097783	United's 25th supplement	DEF097783	Gee, Matthew	DEF097782					
42	DEF097784	United's 25th supplement	DEF097784	Gee, Matthew	DEF097782					
43	DEF097785	United's 25th supplement (DEF097742-DEF097859)	DEF097785	Butler, Matthew	DEF097785	6/19/2018 14:23	Second Email Data iSight Reports Fully Insured - May 2018	Butler, Matthew [matthew.butler@MultiPlan.com]	Paradise, Rebecca B [rebecca_paradise@uhc.com]; Peterson, Sarah R [sarah_r_peterson@uhc.com]; Larson, Carolyn S [carolyn_s_larson@uhc.com]; Bradley, Jolene M [jolene_bradley@uhc.com]; Lopez, Radames [radames_lopez_jr@uhc.com]; Olson, Patricia [patricia_olson@uhc.com]; Lermuseaux, David B [david_b_lermuseaux@uhc.com]; Bond, Wendy M [wendy_m_bond@uhc.com]; Mike, Crystal [crystal.mike@uhc.com]; Johnsonkins, Susan M [sue_johnkins@uhc.com]	Butler, Matthew [matthew.butler@MultiPlan.com]; Dominy, Susan [Susan.Dominy@MultiPlan.com]; Emma.johnson@Multiplan.com; Kienzle, Jacqueline [jacqueline.kienzle@MultiPlan.com]
44	DEF097786	United's 25th supplement	DEF097786	Gee, Matthew	DEF097785					
45	DEF097787	United's 25th supplement	DEF097787	Gee, Matthew	DEF097785					

Row #	Bates	Document Set	End Bates	Author	Begin Family	Date Sent	Subject	From	To	Cc
46	DEF097788	United's 25th supplement (DEF097742-DEF097859)	DEF097788	Butler, Matthew	DEF097788	9/8/2017 8:32	Data iSight Reports Fully Insured - August 2017	Butler, Matthew [matthew.butler@MultiPlan.com]	Paradise, Rebecca B (rebecca_paradise@uhc.com)'; [rebecca_paradise@uhc.com]; 'Sarah R Peterson (sarah_r_peterson@uhc.com)'; [sarah_r_peterson@uhc.com]; 'Carolyn S Larson (carolyn_s_larson@uhc.com)'; [carolyn_s_larson@uhc.com]; 'Jolene Bradley (jolene_bradley@uhc.com)'; [jolene_bradley@uhc.com]; 'Logan, Angela M (angela_m_logan@uhc.com)'; [angela_m_logan@uhc.com]; Lopez, Radames (radames_lopez_jr@uhc.com)'; [radames_lopez_jr@uhc.com]; Olson, Patricia (patricia_olson@uhc.com)'; [patricia_olson@uhc.com]	Kienzle, Jacqueline [jacqueline.kienzle@MultiPlan.com]; Dominy, Susan [Susan.Dominy@MultiPlan.com]; Butler, Matthew [matthew.butler@MultiPlan.com]; Johnson, Emma [emma.johnson@MultiPlan.com]
47	DEF097789	United's 25th supplement	DEF097789	Gee, Matthew	DEF097788					
48	DEF097790	United's 25th supplement	DEF097790	Gee, Matthew	DEF097788					
49	DEF097791	United's 25th supplement	DEF097791	Gee, Matthew	DEF097788					
50	DEF097792	United's 25th supplement	DEF097792	Gee, Matthew	DEF097788					
51	DEF097793	United's 25th supplement	DEF097793	Gee, Matthew	DEF097788					

Row #	Bates	Document Set	End Bates	Author	Begin Family	Date Sent	Subject	From	To	Cc
52	DEF097794	United's 25th supplement (DEF097742-DEF097859)	DEF097794	Butler, Matthew	DEF097794	9/8/2017 8:31	Data iSight Reports ASO - August 2017	Butler, Matthew [matthew.butler@MultiPlan.com]	Paradise, Rebecca B (rebecca_paradise@uhc.com); [rebecca_paradise@uhc.com]; Sarah R Peterson (sarah_r_peterson@uhc.com); [sarah_r_peterson@uhc.com]; Carolyn S Larson (carolyn_s_larson@uhc.com); [carolyn_s_larson@uhc.com]; Jolene Bradley (jolene_bradley@uhc.com); [jolene_bradley@uhc.com]; Logan, Angela M (angela_m_logan@uhc.com); [angela_m_logan@uhc.com]; Lopez, Radames (radames_lopez_jr@uhc.com); [radames_lopez_jr@uhc.com]; Olson, Patricia (patricia_olson@uhc.com); [patricia_olson@uhc.com]	Kienzle, Jacqueline [jacqueline.kienzle@MultiPlan.com]; Dominy, Susan [Susan.Dominy@MultiPlan.com]; Butler, Matthew [matthew.butler@MultiPlan.com]; Johnson, Emma [emma.johnson@MultiPlan.com]
53	DEF097795	United's 25th supplement	DEF097795	Gee, Matthew	DEF097794					
54	DEF097796	United's 25th supplement	DEF097796	Gee, Matthew	DEF097794					
55	DEF097797	United's 25th supplement	DEF097797	Gee, Matthew	DEF097794					
56	DEF097798	United's 25th supplement	DEF097798	Gee, Matthew	DEF097794					
57	DEF097799	United's 25th supplement	DEF097799	Gee, Matthew	DEF097794					



Row #	Bates	Document Set	End Bates	Author	Begin Family	Date Sent	Subject	From	To	Cc
58	DEF097800	United's 25th supplement (DEF097742-DEF097859)	DEF097800	Butler, Matthew	DEF097800	10/17/2017 6:47	Data iSight Reports Fully Insured - September 2017	Butler, Matthew [matthew.butler@MultiPlan.com]	Paradise, Rebecca B (rebecca_paradise@uhc.com)'; [rebecca_paradise@uhc.com]; 'Sarah R Peterson (sarah_r_peterson@uhc.com)'; [sarah_r_peterson@uhc.com]; 'Carolyn S Larson (carolyn_s_larson@uhc.com)'; [carolyn_s_larson@uhc.com]; 'Jolene Bradley (jolene_bradley@uhc.com)'; [jolene_bradley@uhc.com]; 'Logan, Angela M (angela_m_logan@uhc.com)'; [angela_m_logan@uhc.com]; Lopez, Radames (radames_lopez_jr@uhc.com)'; [radames_lopez_jr@uhc.com]; Olson, Patricia (patricia_olson@uhc.com)'; [patricia_olson@uhc.com]	Kienzle, Jacqueline [jacqueline.kienzle@MultiPlan.com]; Dominy, Susan [Susan.Dominy@MultiPlan.com]; Butler, Matthew [matthew.butler@MultiPlan.com]; Johnson, Emma [emma.johnson@MultiPlan.com]
59	DEF097801	United's 25th supplement	DEF097801	Gee, Matthew	DEF097800					
60	DEF097802	United's 25th supplement	DEF097802	Gee, Matthew	DEF097800					
61	DEF097803	United's 25th supplement	DEF097803	Gee, Matthew	DEF097800					
62	DEF097804	United's 25th supplement	DEF097804	Gee, Matthew	DEF097800					
63	DEF097805	United's 25th supplement	DEF097805	Gee, Matthew	DEF097800					

Row #	Bates	Document Set	End Bates	Author	Begin Family	Date Sent	Subject	From	To	Cc
64	DEF097806	United's 25th supplement (DEF097742-DEF097859)	DEF097806	Butler, Matthew	DEF097806	4/17/2017 13:47	Data iSight Reports ASO - March 2017	Butler, Matthew [matthew.butler@MultiPlan.com]	Paradise, Rebecca B (rebecca_paradise@uhc.com); [rebecca_paradise@uhc.com]; Sarah R Peterson (sarah_r_peterson@uhc.com); [sarah_r_peterson@uhc.com]; Carolyn S Larson (carolyn_s_larson@uhc.com); [carolyn_s_larson@uhc.com]; Jolene Bradley (jolene_bradley@uhc.com); [jolene_bradley@uhc.com]; Logan, Angela M (angela_m_logan@uhc.com); [angela_m_logan@uhc.com]; Lopez, Radames (radames_lopez_jr@uhc.com); [radames_lopez_jr@uhc.com]; Olson, Patricia (patricia_olson@uhc.com); [patricia_olson@uhc.com]	Kienzle, Jacqueline [jacqueline.kienzle@MultiPlan.com]; Dominy, Susan [Susan.Dominy@MultiPlan.com]; Butler, Matthew [matthew.butler@MultiPlan.com]; Johnson, Emma [emma.johnson@MultiPlan.com]
65	DEF097807	United's 25th supplement	DEF097807	Gee, Matthew	DEF097806					
66	DEF097808	United's 25th supplement	DEF097808	Gee, Matthew	DEF097806					
67	DEF097809	United's 25th supplement	DEF097809	Gee, Matthew	DEF097806					
68	DEF097810	United's 25th supplement	DEF097810	Gee, Matthew	DEF097806					
69	DEF097811	United's 25th supplement	DEF097811	Gee, Matthew	DEF097806					

Row #	Bates	Document Set	End Bates	Author	Begin Family	Date Sent	Subject	From	To	Cc
70	DEF097812	United's 25th supplement (DEF097742-DEF097859)	DEF097812	Butler, Matthew	DEF097812	5/12/2017 11:06	Data iSight Reports Fully Insured - April 2017	Butler, Matthew [matthew.butler@MultiPlan.com]	Paradise, Rebecca B (rebecca_paradise@uhc.com)'; [rebecca_paradise@uhc.com]; 'Sarah R Peterson (sarah_r_peterson@uhc.com)'; [sarah_r_peterson@uhc.com]; 'Carolyn S Larson (carolyn_s_larson@uhc.com)'; [carolyn_s_larson@uhc.com]; 'Jolene Bradley (jolene_bradley@uhc.com)'; [jolene_bradley@uhc.com]; 'Logan, Angela M (angela_m_logan@uhc.com)'; [angela_m_logan@uhc.com]; Lopez, Radames (radames_lopez_jr@uhc.com)'; [radames_lopez_jr@uhc.com]; Olson, Patricia (patricia_olson@uhc.com)'; [patricia_olson@uhc.com]	Kienzle, Jacqueline [jacqueline.kienzle@MultiPlan.com]; Dominy, Susan [Susan.Dominy@MultiPlan.com]; Butler, Matthew [matthew.butler@MultiPlan.com]; Johnson, Emma [emma.johnson@MultiPlan.com]
71	DEF097813	United's 25th supplement	DEF097813	Gee, Matthew	DEF097812					
72	DEF097814	United's 25th supplement	DEF097814	Gee, Matthew	DEF097812					
73	DEF097815	United's 25th supplement	DEF097815	Gee, Matthew	DEF097812					
74	DEF097816	United's 25th supplement	DEF097816	Gee, Matthew	DEF097812					
75	DEF097817	United's 25th supplement	DEF097817	Gee, Matthew	DEF097812					

Row #	Bates	Document Set	End Bates	Author	Begin Family	Date Sent	Subject	From	To	Cc
76	DEF097818	United's 25th supplement (DEF097742-DEF097859)	DEF097818	Butler, Matthew	DEF097818	5/12/2017 11:05	Data iSight Reports ASO - April 2017	Butler, Matthew [matthew.butler@MultiPlan.com]	Paradise, Rebecca B (rebecca_paradise@uhc.com); [rebecca_paradise@uhc.com]; Sarah R Peterson (sarah_r_peterson@uhc.com); [sarah_r_peterson@uhc.com]; Carolyn S Larson (carolyn_s_larson@uhc.com); [carolyn_s_larson@uhc.com]; Jolene Bradley (jolene_bradley@uhc.com); [jolene_bradley@uhc.com]; Logan, Angela M (angela_m_logan@uhc.com); [angela_m_logan@uhc.com]; Lopez, Radames (radames_lopez_jr@uhc.com); [radames_lopez_jr@uhc.com]; Olson, Patricia (patricia_olson@uhc.com); [patricia_olson@uhc.com]	Kienzle, Jacqueline [jacqueline.kienzle@MultiPlan.com]; Dominy, Susan [Susan.Dominy@MultiPlan.com]; Butler, Matthew [matthew.butler@MultiPlan.com]; Johnson, Emma [emma.johnson@MultiPlan.com]
77	DEF097819	United's 25th supplement	DEF097819	Gee, Matthew	DEF097818					
78	DEF097820	United's 25th supplement	DEF097820	Gee, Matthew	DEF097818					
79	DEF097821	United's 25th supplement	DEF097821	Gee, Matthew	DEF097818					
80	DEF097822	United's 25th supplement	DEF097822	Gee, Matthew	DEF097818					
81	DEF097823	United's 25th supplement	DEF097823	Gee, Matthew	DEF097818					

Row #	Bates	Document Set	End Bates	Author	Begin Family	Date Sent	Subject	From	To	Cc
82	DEF097824	United's 25th supplement (DEF097742-DEF097859)	DEF097824	Butler, Matthew	DEF097824	6/14/2017 14:57	Data iSight Reports Fully Insured - May 2017	Butler, Matthew [matthew.butler@MultiPlan.com]	Paradise, Rebecca B (rebecca_paradise@uhc.com)'; [rebecca_paradise@uhc.com]'; Sarah R Peterson (sarah_r_peterson@uhc.com)'; [sarah_r_peterson@uhc.com]'; Carolyn S Larson (carolyn_s_larson@uhc.com)'; [carolyn_s_larson@uhc.com]'; Jolene Bradley (jolene_bradley@uhc.com)'; [jolene_bradley@uhc.com]'; Logan, Angela M (angela_m_logan@uhc.com)'; [angela_m_logan@uhc.com]'; Lopez, Radames (radames_lopez_jr@uhc.com)'; [radames_lopez_jr@uhc.com]'; Olson, Patricia (patricia_olson@uhc.com)'; [patricia_olson@uhc.com]	Kienzle, Jacqueline [jacqueline.kienzle@MultiPlan.com]; Dominy, Susan [Susan.Dominy@MultiPlan.com]; Butler, Matthew [matthew.butler@MultiPlan.com]; Johnson, Emma [emma.johnson@MultiPlan.com]
83	DEF097825	United's 25th supplement	DEF097825	Gee, Matthew	DEF097824					
84	DEF097826	United's 25th supplement	DEF097826	Gee, Matthew	DEF097824					
85	DEF097827	United's 25th supplement	DEF097827	Gee, Matthew	DEF097824					
86	DEF097828	United's 25th supplement	DEF097828	Gee, Matthew	DEF097824					
87	DEF097829	United's 25th supplement	DEF097829	Gee, Matthew	DEF097824					

Row #	Bates	Document Set	End Bates	Author	Begin Family	Date Sent	Subject	From	To	Cc
88	DEF097830	United's 25th supplement (DEF097742-DEF097859)	DEF097830	Butler, Matthew	DEF097830	6/14/2017 14:57	Data iSight Reports ASO - May 2017	Butler, Matthew [matthew.butler@MultiPlan.com]	Paradise, Rebecca B (rebecca_paradise@uhc.com); [rebecca_paradise@uhc.com]; Sarah R Peterson (sarah_r_peterson@uhc.com); [sarah_r_peterson@uhc.com]; Carolyn S Larson (carolyn_s_larson@uhc.com); [carolyn_s_larson@uhc.com]; Jolene Bradley (jolene_bradley@uhc.com); [jolene_bradley@uhc.com]; Logan, Angela M (angela_m_logan@uhc.com); [angela_m_logan@uhc.com]; Lopez, Radames (radames_lopez_jr@uhc.com); [radames_lopez_jr@uhc.com]; Olson, Patricia (patricia_olson@uhc.com); [patricia_olson@uhc.com]	Kienzle, Jacqueline [jacqueline.kienzle@MultiPlan.com]; Dominy, Susan [Susan.Dominy@MultiPlan.com]; Butler, Matthew [matthew.butler@MultiPlan.com]; Johnson, Emma [emma.johnson@MultiPlan.com]
89	DEF097831	United's 25th supplement	DEF097831	Gee, Matthew	DEF097830					
90	DEF097832	United's 25th supplement	DEF097832	Gee, Matthew	DEF097830					
91	DEF097833	United's 25th supplement	DEF097833	Gee, Matthew	DEF097830					
92	DEF097834	United's 25th supplement	DEF097834	Gee, Matthew	DEF097830					
93	DEF097835	United's 25th supplement	DEF097835	Gee, Matthew	DEF097830					

Row #	Bates	Document Set	End Bates	Author	Begin Family	Date Sent	Subject	From	To	Cc
94	DEF097836	United's 25th supplement (DEF097742-DEF097859)	DEF097836	Butler, Matthew	DEF097836	7/14/2017 12:24	Data iSight Reports Fully Insured - June 2017	Butler, Matthew [matthew.butler@MultiPlan.com]	Paradise, Rebecca B (rebecca_paradise@uhc.com)'; [rebecca_paradise@uhc.com]; 'Sarah R Peterson (sarah_r_peterson@uhc.com)'; [sarah_r_peterson@uhc.com]; 'Carolyn S Larson (carolyn_s_larson@uhc.com)'; [carolyn_s_larson@uhc.com]; 'Jolene Bradley (jolene_bradley@uhc.com)'; [jolene_bradley@uhc.com]; 'Logan, Angela M (angela_m_logan@uhc.com)'; [angela_m_logan@uhc.com]; Lopez, Radames (radames_lopez_jr@uhc.com)'; [radames_lopez_jr@uhc.com]; Olson, Patricia (patricia_olson@uhc.com)'; [patricia_olson@uhc.com]	Kienzle, Jacqueline [jacqueline.kienzle@MultiPlan.com]; Dominy, Susan [Susan.Dominy@MultiPlan.com]; Butler, Matthew [matthew.butler@MultiPlan.com]; Johnson, Emma [emma.johnson@MultiPlan.com]
95	DEF097837	United's 25th supplement	DEF097837	Gee, Matthew	DEF097836					
96	DEF097838	United's 25th supplement	DEF097838	Gee, Matthew	DEF097836					
97	DEF097839	United's 25th supplement	DEF097839	Gee, Matthew	DEF097836					
98	DEF097840	United's 25th supplement	DEF097840	Gee, Matthew	DEF097836					
99	DEF097841	United's 25th supplement	DEF097841	Gee, Matthew	DEF097836					

Row #	Bates	Document Set	End Bates	Author	Begin Family	Date Sent	Subject	From	To	Cc
100	DEF097842	United's 25th supplement (DEF097742-DEF097859)	DEF097842	Butler, Matthew	DEF097842	7/14/2017 12:24	Data iSight Reports ASO - June 2017	Butler, Matthew [matthew.butler@MultiPlan.com]	Paradise, Rebecca B (rebecca_paradise@uhc.com); [rebecca_paradise@uhc.com]; Sarah R Peterson (sarah_r_peterson@uhc.com); [sarah_r_peterson@uhc.com]; Carolyn S Larson (carolyn_s_larson@uhc.com); [carolyn_s_larson@uhc.com]; Jolene Bradley (jolene_bradley@uhc.com); [jolene_bradley@uhc.com]; Logan, Angela M (angela_m_logan@uhc.com); [angela_m_logan@uhc.com]; Lopez, Radames (radames_lopez_jr@uhc.com); [radames_lopez_jr@uhc.com]; Olson, Patricia (patricia_olson@uhc.com); [patricia_olson@uhc.com]	Kienzle, Jacqueline [jacqueline.kienzle@MultiPlan.com]; Dominy, Susan [Susan.Dominy@MultiPlan.com]; Butler, Matthew [matthew.butler@MultiPlan.com]; Johnson, Emma [emma.johnson@MultiPlan.com]
101	DEF097843	United's 25th supplement	DEF097843	Gee, Matthew	DEF097842					
102	DEF097844	United's 25th supplement	DEF097844	Gee, Matthew	DEF097842					
103	DEF097845	United's 25th supplement	DEF097845	Gee, Matthew	DEF097842					
104	DEF097846	United's 25th supplement	DEF097846	Gee, Matthew	DEF097842					
105	DEF097847	United's 25th supplement	DEF097847	Gee, Matthew	DEF097842					



Row #	Bates	Document Set	End Bates	Author	Begin Family	Date Sent	Subject	From	To	Cc
106	DEF097848	United's 25th supplement (DEF097742-DEF097859)	DEF097848	Butler, Matthew	DEF097848	8/21/2017 12:39	Data iSight Reports Fully Insured - July 2017	Butler, Matthew [matthew.butler@MultiPlan.com]	Paradise, Rebecca B (rebecca_paradise@uhc.com); [rebecca_paradise@uhc.com]; Sarah R Peterson (sarah_r_peterson@uhc.com); [sarah_r_peterson@uhc.com]; Carolyn S Larson (carolyn_s_larson@uhc.com); [carolyn_s_larson@uhc.com]; Jolene Bradley (jolene_bradley@uhc.com); [jolene_bradley@uhc.com]; Logan, Angela M (angela_m_logan@uhc.com); [angela_m_logan@uhc.com]; Lopez, Radames (radames_lopez_jr@uhc.com); [radames_lopez_jr@uhc.com]; Olson, Patricia (patricia_olson@uhc.com); [patricia_olson@uhc.com]	Kienzle, Jacqueline [jacqueline.kienzle@MultiPlan.com]; Dominy, Susan [Susan.Dominy@MultiPlan.com]; Butler, Matthew [matthew.butler@MultiPlan.com]; Johnson, Emma [emma.johnson@MultiPlan.com]
107	DEF097849	United's 25th supplement	DEF097849	Gee, Matthew	DEF097848					
108	DEF097850	United's 25th supplement	DEF097850	Gee, Matthew	DEF097848					
109	DEF097851	United's 25th supplement	DEF097851	Gee, Matthew	DEF097848					
110	DEF097852	United's 25th supplement	DEF097852	Gee, Matthew	DEF097848					
111	DEF097853	United's 25th supplement	DEF097853	Gee, Matthew	DEF097848					

Row #	Bates	Document Set	End Bates	Author	Begin Family	Date Sent	Subject	From	To	Cc
112	DEF097854	United's 25th supplement (DEF097742-DEF097859)	DEF097854	Butler, Matthew	DEF097854	8/21/2017 12:38	Data iSight Reports ASO - July 2017	Butler, Matthew [matthew.butler@MultiPlan.com]	Paradise, Rebecca B (rebecca_paradise@uhc.com); [rebecca_paradise@uhc.com]; Sarah R Peterson (sarah_r_peterson@uhc.com); [sarah_r_peterson@uhc.com]; Carolyn S Larson (carolyn_s_larson@uhc.com); [carolyn_s_larson@uhc.com]; Jolene Bradley (jolene_bradley@uhc.com); [jolene_bradley@uhc.com]; Logan, Angela M (angela_m_logan@uhc.com); [angela_m_logan@uhc.com]; Lopez, Radames (radames_lopez_jr@uhc.com); [radames_lopez_jr@uhc.com]; Olson, Patricia (patricia_olson@uhc.com); [patricia_olson@uhc.com]	Kienzle, Jacqueline [jacqueline.kienzle@MultiPlan.com]; Dominy, Susan [Susan.Dominy@MultiPlan.com]; Butler, Matthew [matthew.butler@MultiPlan.com]; Johnson, Emma [emma.johnson@MultiPlan.com]
113	DEF097855	United's 25th supplement	DEF097855	Gee, Matthew	DEF097854					
114	DEF097856	United's 25th supplement	DEF097856	Gee, Matthew	DEF097854					
115	DEF097857	United's 25th supplement	DEF097857	Gee, Matthew	DEF097854					
116	DEF097858	United's 25th supplement	DEF097858	Gee, Matthew	DEF097854					
117	DEF097859	United's 25th supplement	DEF097859	Gee, Matthew	DEF097854					

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# EXHIBIT 13

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17 *Attorneys for Defendants*

18 **DISTRICT COURT**

19 **CLARK COUNTY, NEVADA**

20 FREMONT EMERGENCY SERVICES  
21 (MANDAVIA), LTD., a Nevada professional  
22 corporation; TEAM PHYSICIANS OF  
23 NEVADA-MANDAVIA, P.C., a Nevada  
24 professional corporation; CRUM, STEFANKO  
25 AND JONES, LTD. dba RUBY CREST  
26 EMERGENCY MEDICINE, a Nevada  
27 professional corporation,

28 Plaintiffs,

vs.

UNITEDHEALTH GROUP, INC., a Delaware  
corporation; UNITED HEALTHCARE  
INSURANCE COMPANY, a Connecticut  
corporation; UNITED HEALTH CARE  
SERVICES INC., dba UNITEDHEALTHCARE,  
a Minnesota corporation; UMR, INC., dba  
UNITED MEDICAL RESOURCES, a Delaware  
corporation; OXFORD HEALTH PLANS, INC., a  
Delaware corporation; SIERRA HEALTH AND  
LIFE INSURANCE COMPANY, INC., a Nevada  
corporation; SIERRA HEALTH-CARE  
OPTIONS, INC., a Nevada corporation; HEALTH  
PLAN OF NEVADA, INC., a Nevada  
corporation; DOES 1-10; ROE ENTITIES 11-20,

Defendants.

///

Case No.: A-19-792978-B

Dept. No.: 27

**DEFENDANTS' SIXTH  
SUPPLEMENTAL RESPONSES TO  
FREMONT EMERGENCY SERVICES  
(MANDAVIA) LTD.'S FIRST SET OF  
REQUESTS FOR PRODUCTION OF  
DOCUMENTS**



1 Defendants UnitedHealth Group, Inc., UnitedHealthcare Insurance Company, United  
2 HealthCare Services Inc., UMR, Inc., Oxford Health Plans, Inc., Sierra Health and Life  
3 Insurance Co., Inc., Sierra Health-Care Options, Inc., and Health Plan of Nevada, Inc. ("United  
4 HealthCare"), by and through their attorneys of the law firm of Weinberg Wheeler Hudgins  
5 Gunn & Dial, LLC, hereby submit these supplemental responses to Plaintiff's ("Plaintiff" or  
6 "Fremont") First Set of Requests for Production of Documents ("Requests") as follows  
7 **(supplemental responses in bold):**

8 **PRELIMINARY STATEMENT**

9 Defendants have made diligent efforts to respond to the Requests, but reserve the right  
10 to change, amend, or supplement their responses and objections. Defendants also reserve the  
11 right to use discovered documents and documents now known, but whose relevance,  
12 significance, or applicability has not yet been ascertained. Additionally, Defendants do not  
13 waive their right to assert any and all applicable privileges, doctrines, and protections, and  
14 hereby expressly state their intent and reserve their right to withhold responsive information  
15 on the basis of any and all applicable privileges, doctrines, and protections.

16 Defendants' responses are made without in any way waiving or intending to waive, but on  
17 the contrary, intending to preserve and preserving, their right, in this litigation or any subsequent  
18 proceeding, to object on any grounds to the use of documents produced in response to the  
19 Request, including objecting on the basis of authenticity, foundation, relevancy, materiality,  
20 privilege, and admissibility of any documents produced in response to the Requests.

21 The documents produced in conjunction with these supplemental responses are being  
22 produced subject to the confidentiality and attorneys' eyes only protections permitted pursuant to  
23 Section 3(f) of the Stipulation and Order Re: Pending Matters that was entered on May 15, 2020  
24 and pursuant to the terms of Confidentiality and Protective Order that the Parties are currently in  
25 the process of negotiating.

26 Defendants are limiting their responses to the Requests to the reasonable time-frame  
27 of July 1, 2017 to present ("Relevant Period") and object to the Requests to the extent that  
28 Plaintiff fails to limit the Requests to a specific time period.

**SPECIFIC OBJECTIONS TO PLAINTIFF'S DEFINITIONS, INSTRUCTIONS,  
AND RULES OF CONSTRUCTION**

1  
2  
3       1.       Defendants object to the "Instructions," "Definitions," and "Rules of  
4 Construction" accompanying the Requests to the extent they purport to impose any obligation  
5 on Defendants different from or greater than those imposed by the Nevada Rules of Civil  
6 Procedure.

7       2.       Defendants object to the "Instructions," "Definitions," and "Rules of  
8 Construction" to the extent they purport to require the production of Protected Health  
9 Information or other confidential or proprietary information without confidentiality  
10 protections sufficient to protect such information from disclosure, such as those found in the  
11 Confidentiality and Protective Order entered on June 24, 2020.

12       3.       Defendants object to the definition of "Claim" or "Claims" as vague, not  
13 described with reasonable particularity, overbroad, unduly burdensome, not relevant to the  
14 claims or defenses in this case, and not proportional to the needs of this case to the extent  
15 they (1) include claims not specifically identified by Plaintiff in FESM000011, or (2) relate  
16 to claims, patients, or health benefits plans for which Defendants are not responsible for the  
17 at-issue claims administration.

18       4.       Defendants object to the definition of "Data iSight" as vague, not described with  
19 reasonable particularity, overbroad, unduly burdensome, not relevant to the claims or defenses  
20 in this case, and not proportional to the needs of this case. Defendants contend that Plaintiff  
21 does not fully or accurately describe Data iSight, which is a service offered by MultiPlan, Inc.  
22 that provides pricing information concerning medical claims.

23       5.       Defendants object to the definition of "Document," "Communication," and  
24 "Communicate" to the extent those terms include within their scope materials, at to the  
25 Requests, to the extent they seek documents or information protected by the attorney-client  
26 privilege, the attorney work product doctrine, the settlement privilege, or any other applicable  
27 privilege, including, but not limited to: information that was prepared for, or in anticipation of,  
28 litigation; that contains or reflects the analysis, mental impressions, or work of counsel; that

1 contains or reflects attorney-client communications; or that is otherwise privileged.

2           6. Defendants object to the definition of the terms "Defendants," as used in the  
3 context of the Requests, and "You," and/or "Your" as vague, not described with reasonable  
4 particularity, overbroad, unduly burdensome, not proportional to the needs of the case, and  
5 seeking information that is not relevant to the outcome of any claims or defenses in this  
6 litigation. Plaintiff's definition includes, for example, "predecessors-in-interest," "partners,"  
7 "any past or present agents," and "every person acting or purporting to act, or who has ever  
8 acted or purported to act, on their behalf," which suggests that Plaintiff seeks materials  
9 beyond Defendants' possession, custody, or control. Defendants will not search for or  
10 produce materials beyond their possession, custody, or control. Defendants have answered  
11 the Requests on behalf of Defendants, *as defined herein*, only based upon Defendants'  
12 knowledge, materials and information in Defendants' possession, and belief formed after  
13 reasonable inquiry.

14           7. Defendants object to the definition of "Fremont" as vague, not described with  
15 reasonable particularity, overbroad, unduly burdensome, not proportional to the needs of the  
16 case, and seeking information that is not relevant to the outcome of any claims or defenses  
17 in this litigation Plaintiff's definition includes, for example, "any past or present agents,"  
18 "representatives," "partners," "predecessors-in-interest," "affiliates," and "every person  
19 acting or purporting to act, or who has ever acted or purported to act, on [its] behalf" without  
20 identifying these entities or persons with reasonable particularity, and creating an undue  
21 burden by requiring Defendants to identify them. In responding to the Requests, Defendants  
22 will construe "Fremont" to refer to those parties who were known to have been affiliated  
23 with Fremont Emergency Services (Mandavia), Ltd. during the Relevant Period.

24           8. Defendants object to the definition of "Emergency Services and Care,"  
25 "Emergency Medicine Services," and "Emergency Department Services" as vague, not  
26 described with reasonable particularity, overbroad, unduly burdensome, not relevant to the  
27 claims or defenses in this case, and not proportional to the needs of this case to the extent they  
28 (1) include any medical services not related to the at-issue claims, or (2) relate to any medical

1 services for claims, patients, or health benefits plans for which Defendants are not responsible  
2 for the at-issue claims administration.

3 9. Defendants object to the definition of "Nonemergency Services and Care" as  
4 vague, not described with reasonable particularity, overbroad, unduly burdensome, not  
5 relevant to the claims or defenses in this case, and not proportional to the needs of this case  
6 to the extent it (1) includes services by not related to the at-issue claims, or (2) relates to the  
7 services for claims, patients, or health benefits plans for which Defendants are not  
8 responsible for the at-issue claims administration.

9 10. Defendants object to the definition of "Non-Participating Provider," "Non-  
10 Network Provider," "Participating Provider," and "Network Provider" as vague, not  
11 described with reasonable particularity, overbroad, unduly burdensome, not relevant to the  
12 claims or defenses in this case, and not proportional to the needs of this case to the extent  
13 they (1) include persons or entities that are not parties to this case, or (2) concern persons or  
14 entities unrelated to the at-issue claims.

15 11. Defendants object to the definition of "Plans" and "Plan Members" as vague,  
16 not described with reasonable particularity, overbroad, unduly burdensome, not relevant to  
17 the claims or defenses in this case, and not proportional to the needs of this case to the  
18 extent they (1) include health benefits plans and members of such plans not specifically  
19 identified by Plaintiff, (2) include health benefits plans that are not related to the at-issue  
20 claims, or (3) are referring to health benefits plans for which Defendants are not responsible  
21 for the at-issue claims administration.

22 12. Defendants object to the definition of "Provider" as vague, not described with  
23 reasonable particularity, overbroad, unduly burdensome, not relevant to the claims or defenses  
24 in this case, and not proportional to the needs of this case to the extent it (1) includes persons  
25 or entities that are not parties to this case, or (2) concern persons or entities unrelated to the  
26 at-issue claims.

27 13. Defendants object to Instruction No. 1 as vague and not described with reasonable  
28 particularity, as it uses the term Defendant, in the singular, without defining which of the



Defendants it is referring to. Defendants also object to Instruction No. 1 to the extent it seeks to impose obligations and/or penalties on Defendants beyond what is contemplated by the Nevada Rules of Civil Procedure or applicable local rules.

14. Defendants object to Instruction Nos. 2, 3, 4, 5, 6, 7, and 8 to the extent they seek to impose obligations and/or penalties on Defendants beyond what is contemplated by the Nevada Rules of Civil Procedure.

15. Defendants object to Instruction No. 9 as unduly burdensome and not proportional to the needs of the case insofar as it asks Defendants to provide "[for each document produced, identify the specific document request number or numbers to which the document is responsive." Defendants also object to Instruction No. 9 to the extent it seeks to impose obligations and/or penalties on Defendants beyond what is contemplated by the Nevada Rules of Civil Procedure.

16. Defendants object to Instruction Nos. 10, 11, and 12 to the extent they seek to impose obligations and/or penalties on Defendants beyond what is contemplated by the Nevada Rules of Civil Procedure.

17. Defendants object to Instruction No. 13 as unduly burdensome and not proportional to the needs of the case insofar as it asks Defendants to provide the name of "the person you believe to have possession of the missing documents, and the facts upon which you base your response." Defendants also object to Instruction No. 13 to the extent it seeks to impose obligations and/or penalties on Defendants beyond what is contemplated by the Nevada Rules of Civil Procedure.

## **RESPONSES TO REQUESTS FOR PRODUCTION OF DOCUMENTS**

### **REQUEST FOR PRODUCTION NO. 6:**

Produce any and all Documents and/or Communications relating to Your decision to reduce payment for any CLAIM.

### **RESPONSE:**

Subject to and without waiving Defendants' objections, including Defendants' specific objections to Plaintiff's Definitions, Instructions and Rules of Construction, Defendants state as

1 follows: Defendants object that the term "CLAIM" as vague, as noted in Defendants' objections  
2 to Plaintiff's Definitions, as the definition does not identify what specific list of claims it is  
3 referring to. However, Defendants interpret this Request as referring to the claims listed in  
4 FESM000011. Assuming those are the claims Fremont intended to refer to, Defendants object to  
5 this Request on the basis that it is unduly burdensome and seeks information that is not  
6 proportional to the needs of the case. Fremont has asserted 15,210 CLAIMS where it alleges that  
7 Defendants did not reimburse Fremont for the full amount billed. To produce the documents and  
8 communications related to any decision to reduce payment on a CLAIM, Defendants would,  
9 among other things, have to pull the administrative record for each of the 15,210 individual  
10 CLAIMS, review the records for privileged/protected information and then produce them. As  
11 explained more fully in the burden declaration attached as Exhibit 1, this would be unduly  
12 burdensome as Defendants believe it will take 2 hours to pull each individual claim file for a  
13 total of 30,420 hours of employee labor..

14 Moreover, the request is overbroad, unduly burdensome, not reasonably particular, and  
15 not proportional to the needs of the case as it essentially requests all documents related to the  
16 parties' claims and defenses. It would be essentially impossible for Defendants to perform the  
17 investigation necessary to identify all documents and communications that in some way relate to  
18 the decision to not pay the full billed charges on all of the 15,210 CLAIMS.

19 **Responding further, subject to and without waiving Defendants' objections: please**  
20 **see documents produced concurrently herewith as DEF010455-DEF010554. Defendants**  
21 **have made diligent efforts to respond to the Requests, but reserve the right to**  
22 **supplement their responses and objections.**

23 **REQUEST FOR PRODUCTION NO. 7:**

24 Produce any and all Documents and/or Communications supporting or relating to Your  
25 contention or belief that You are entitled to pay or allow less than Fremont's full billed charges  
26 for any of the CLAIMS.

27 ///

28 ///

1 **RESPONSE:**

2 Subject to and without waiving Defendants' objections, including Defendants' specific  
3 objections to Plaintiff's Definitions, Instructions and Rules of Construction, Defendants state as  
4 follows: Defendants object that the term "CLAIM" is vague, as noted in Defendants' objections  
5 to Plaintiff's Definitions, as the definition does not identify what specific list of claims it is  
6 referring to. However, Defendants interpret this Request as referring to the claims listed in  
7 FESM000011. Assuming those are the claims Plaintiff intended to refer to, Defendants object  
8 to this Request on the basis that it is unduly burdensome and seeks information that is not  
9 proportional to the needs of the case. Plaintiff has asserted 15,210 CLAIMS where it alleges that  
10 Defendants did not reimburse Plaintiff for the full amount billed. To produce the documents and  
11 communications related to any decision to pay or allow less than Plaintiff's full billed charges on  
12 a CLAIM, Defendants would, among other things, have to pull the administrative record for each  
13 of the 15,210 individual CLAIMS, review the records for privileged/protected information and  
14 then produce them. As explained more fully in the burden declaration attached as Exhibit 1, this  
15 would be unduly burdensome as Defendants believe it will take 2 hours to pull each individual  
16 claim file for a total of 30,420 hours of employee labor.

17 Moreover, the request is overbroad, unduly burdensome, not reasonably particular, and  
18 not proportional to the needs of the case as it essentially requests all documents related to the  
19 parties' claims and defenses. It would be essentially impossible for Defendants to perform the  
20 investigation necessary to identify all documents and communications that in some way relate to  
21 the decision to not pay the full billed charges on all of the 15,210 CLAIMS.

22 **Responding further, subject to and without waiving Defendants' objections: please**  
23 **see documents produced concurrently herewith as DEF010455-DEF010554. Defendants**  
24 **have made diligent efforts to respond to this Request, but reserve the right to**  
25 **supplement their response and objections.**

26 **REQUEST FOR PRODUCTION NO. 11:**

27 Produce all Documents and/or Communications between You and any third-party,  
28 including but not limited to Data iSight, relating to (a) any claim for payment for medical

1 services rendered by Fremont to any Plan Member, or (b) any medical services rendered by  
2 Fremont to any Plan Member.

3 **RESPONSE:**

4 Subject to and without waiving Defendants' objections, including Defendants' specific  
5 objections to Plaintiff's Definitions, Instructions and Rules of Construction, Defendants state as  
6 follows: Defendants object that this Request is unduly burdensome and seeks information that is  
7 not proportional to the needs of the case. Fremont has asserted 15,210 claims where it alleges  
8 that Defendants did not reimburse Fremont for the full amount billed. To produce the documents  
9 and communications that may have been exchanged between Defendants, Data iSight, and other  
10 third parties related to these claims and medical services, Defendants would, among other things,  
11 have to pull the administrative record for each of the 15,210 individual CLAIMS, review the  
12 records for privileged/protected information and then produce them. As explained more fully in  
13 the burden declaration attached as Exhibit 1, this would be unduly burdensome as Defendants  
14 believe it will take 2 hours to pull each individual claim file for a total of 30,420 hours of  
15 employee labor. Defendants further object that this Request is vague and overbroad to the extent  
16 it seeks documents and communications with unnamed "third parties" beyond Data iSight.  
17 Defendants will not be producing "all" documents and communications with Data iSight and  
18 these unnamed third parties.

19 Defendants further respond that with these responses they have produced the relevant  
20 contract(s) between United and MultiPlan, Inc. pursuant to which United received pricing  
21 information through MultiPlan's Data iSight tool, redacted as necessary to protect irrelevant  
22 propriety information. See DEF000722-DEF000854. **Responding further, subject to and**  
23 **without waiving Defendants' objections: please see documents produced concurrently**  
24 **herewith as DEF010455-DEF010554. Defendants have made diligent efforts to respond to**  
25 **this Request, but reserve the right to supplement their response and objections.**

26 **REQUEST FOR PRODUCTION NO. 12:**

27 Produce all Documents identifying and describing all products or services Data iSight,  
28 provides to You with respect to Your Health Plans issued in Nevada or any other state, including

1 without limitation repricing services provided to You, whether You adjudicated and paid any  
2 Claims in accordance with re-pricing information recommended by Data iSight, and the appeals  
3 administration services provided to You.

4 **RESPONSE:**

5 Subject to and without waiving Defendants' objections, including Defendants' specific  
6 objections to Plaintiff's Definitions, Instructions and Rules of Construction, Defendants state as  
7 follows: Defendants object that this Request is unduly burdensome and seeks information that is  
8 not proportional to the needs of the case to the extent it asks for information on "whether You  
9 adjudicated and paid any Claims in accordance with re-pricing information recommended by  
10 Data iSight." Fremont has asserted 15,210 claims where it alleges that Defendants did not  
11 reimburse Fremont for the full amount billed. To produce the documents related to whether  
12 information from Data iSight impacted how any of the 15,210 claims were reimbursed,  
13 Defendants would, among other things, have to pull the administrative record for each of the  
14 15,210 individual claims, review the records for privileged/protected information and then  
15 produce them. As explained more fully in the burden declaration attached to Defendants' initial  
16 set of responses as Exhibit 1, this would be unduly burdensome as Defendants believe it will take  
17 2 hours to pull each individual claim file for a total of 30,420 hours of employee labor.

18 Defendants further object to the portion of this Request that seeks information on "all  
19 products or services Data iSight provides to You." This portion of this Request appears to seek  
20 information that is not relevant to any of Plaintiff's claims and that is not proportional to the  
21 needs of the case as not all services Data iSight provides relate to Plaintiff's claims.  
22 Furthermore, Plaintiff has yet to identify any at-issue claims that were priced using the Data  
23 iSight tool, despite Defendants' request that Plaintiff do so. No documents will produced in  
24 response to this portion of this Request.

25 Defendants further respond that with these responses they have produced the relevant  
26 contract(s) between United and MultiPlan, Inc. pursuant to which United received pricing  
27 information through MultiPlan's Data iSight tool. *See* DEF000722-DEF000854; DEF001380-  
28 DEF001387, marked as "attorney eyes only" pursuant to the confidentiality and protective order;

1 DEF001388-DEF001520, produced pursuant to Court order, and marked as “attorney eyes only”  
2 pursuant to the confidentiality and protective order; DEF001521-DEF001535, produced pursuant  
3 to Court order, and marked as “attorney eyes only” pursuant to the confidentiality and protective  
4 order. **Responding further, subject to and without waiving Defendants’ objections: please**  
5 **see documents produced concurrently herewith as DEF010455-DEF010554. Defendants**  
6 **have made diligent efforts to respond to this Request, but reserve the right to**  
7 **supplement their response and objections.**

8 **REQUEST FOR PRODUCTION NO. 18:**

9 All documents and/or communications regarding the rational, basis, or justification for  
10 the reduced rates for emergency services proposed to Fremont in or around 2017 to Present.

11 **RESPONSE:**

12 Subject to and without waiving Defendants’ objections, including Defendants’ specific  
13 objections to Plaintiff’s Definitions, Instructions and Rules of Construction, Defendants state as  
14 follows: Defendants object to this Request on the basis that it is unduly burdensome and seeks  
15 information that is not proportional to the needs of the case. Fremont has asserted 15,210 claims  
16 where it alleges that Defendants did not reimburse Fremont for the full amount billed. To  
17 produce the documents related to why those claims were paid at a particulate rate, Defendants  
18 would, among other things, have to pull the administrative record for each of the 15,210  
19 individual CLAIMS, review the records for privileged/protected information and then produce  
20 them. As explained more fully in the burden declaration attached as Exhibit 1, this would be  
21 unduly burdensome as Defendants believe it will take 2 hours to pull each individual claim file  
22 for a total of 30,420 hours of employee labor.

23 Moreover, the request is overbroad, unduly burdensome, not reasonably particular, and  
24 not proportional to the needs of the case as it essentially requests all documents related to the  
25 parties’ claims and defenses. It would be essentially impossible for Defendants to perform the  
26 investigation necessary to identify all documents and communications that in someway relate to  
27 the justification for the payments made on all of the 15,210 CLAIMS.

28 ///

1       **Responding further, subject to and without waiving Defendants’ objections: please**  
2 **see documents produced concurrently herewith as DEF010455-DEF010554. Defendants**  
3 **have made diligent efforts to respond to this Request, but reserve the right to**  
4 **supplement their response and objections.**

5 **REQUEST FOR PRODUCTION NO. 21:**

6       All Documents relating to Your relationship [to] Data iSight, including any and all  
7 agreements between You and Data iSight, and any and all documents that explain the scope and  
8 extent of the relationship, Your permitted uses of the data provided by Data iSight, and the  
9 services performed by Data iSight.

10 **RESPONSE:**

11       Subject to and without waiving Defendants’ objections, including Defendants’ specific  
12 objections to Plaintiff’s Definitions, Instructions and Rules of Construction, Defendants state as  
13 follows: Defendants object that this Request is overbroad, unduly burdensome and seeks facts  
14 that are not relevant Plaintiff’s claims and not proportional to the needs of the case, as it seeks  
15 “all agreements” and “all documents” regardless of whether they relate to Plaintiff’s claims.

16       Defendants further respond that with these responses they have produced the relevant  
17 contract(s) between United and MultiPlan, Inc. pursuant to which United received pricing  
18 information through MultiPlan’s Data iSight tool. *See* DEF000722-DEF000854; DEF001380-  
19 DEF001387, marked as “attorney eyes only” pursuant to the confidentiality and protective order;  
20 DEF001388-DEF001520, produced pursuant to Court order, and marked as “attorney eyes only”  
21 pursuant to the confidentiality and protective order; DEF001521-DEF001535, produced pursuant  
22 to Court order, and marked as “attorney eyes only” pursuant to the confidentiality and protective  
23 order.

24       **Responding further, subject to and without waiving Defendants’ objections: please**  
25 **see documents produced concurrently herewith as DEF010455-DEF010554. Defendants**  
26 **have made diligent efforts to respond to this Request, but reserve the right to**  
27 **supplement their response and objections.**

28 **///**

1 **REQUEST FOR PRODUCTION NO. 31:**

2 Produce any and all documents and/or Communications regarding Your goals, thoughts,  
3 discussions, considerations, and/or strategy regarding reimbursement rates and/or fee schedules  
4 for participating Emergency Medicine Groups and/or any hospitals or other providers of  
5 Emergency Department Services from January 1, 2015, through the present.

6 **RESPONSE:**

7 Subject to and without waiving Defendants' objections, including Defendants' specific  
8 objections to Plaintiff's Definitions, Instructions and Rules of Construction, Defendants state as  
9 follows:

10 Defendants object that this Request is overbroad, unduly burdensome and seeks  
11 information that is not relevant to Plaintiff's claims and not proportional to the needs of the case.  
12 This Request seeks a substantial amount of information regarding Defendants' negotiations,  
13 strategy, relationship, and rates of reimbursement to numerous non-parties which has no  
14 relevance to Plaintiff's claims. Defendants further object that this Request seeks irrelevant  
15 information to the extent this Request seeks information from prior to July 1, 2017 as Plaintiff is  
16 not asserting any claims for services prior to that date. Defendants further object that, as written,  
17 this Request is vague and it is unclear exactly what documents would be responsive to this  
18 Request. Defendants further object that, since this Request refers to Defendants' "goals,"  
19 "thoughts," and "strategy," it may be seeking information that is protected by the attorney-client  
20 and/or attorney work product privileges.

21 Defendants also object that this Request improperly asks that they reveal information  
22 about their agreements with other providers. Defendants' agreements with other providers  
23 typically contain confidentiality clauses such that producing these agreements could force  
24 Defendants to breach their obligations to these third parties. Moreover, the information sought is  
25 proprietary and subject to protection as a trade secret pursuant to NRS 600A.030(5) as this  
26 information has independent value due to, among other things, the fact that it is not known to  
27 other providers like Fremont.

28 **Responding further, subject to and without waiving Defendants' objections: please**



1 see documents produced concurrently herewith as DEF010455-DEF010554. Defendants  
2 have made diligent efforts to respond to this Request, but reserve the right to  
3 supplement their response and objections.

4 **REQUEST FOR PRODUCTION NO. 32:**

5 Produce any and all Documents and/or Communications regarding Your goals, thoughts,  
6 discussions, considerations, and/or strategy regarding reimbursement rates and/or fee schedules  
7 for non-participating Emergency Medicine Groups and/or any hospitals or other providers of  
8 Emergency Department Services from January 1, 2016, through the present.

9 **RESPONSE:**

10 Subject to and without waiving Defendants' objections, including Defendants' specific  
11 objections to Plaintiff's Definitions, Instructions and Rules of Construction, Defendants state as  
12 follows:

13 Defendants object that this Request is overbroad, unduly burdensome and seeks  
14 information that is not relevant to Plaintiff's claims and not proportional to the needs of the case.  
15 This Request seeks a substantial amount of information regarding Defendants' negotiations,  
16 strategy, relationship, and rates of reimbursement to numerous non-parties which has no  
17 relevance to Plaintiff's claims. Defendants further object that this Request seeks irrelevant  
18 information to the extent this Request seeks information from prior to July 1, 2017 as Fremont is  
19 not asserting any claims for services prior to that date. Defendants further object that, as written,  
20 this Request is vague and it is unclear exactly what documents would be responsive to this  
21 Request. Defendants further object that, since this Request refers to Defendants' "goals."  
22 "thoughts," and "strategy," it may be seeking information that is protected by the attorney-client  
23 and/or attorney work product privileges.

24 Defendants also object that this Request improperly asks that they reveal information  
25 about their agreements with other providers. Defendants' agreements with other providers  
26 typically contain confidentiality clauses such that producing these agreements could force  
27 Defendants to breach their obligations to these third parties. Moreover, the information sought is  
28 proprietary and subject to protection as a trade secret pursuant to NRS 600A.030(5) as this

1 information has independent value due to, among other things, the fact that it is not known to  
2 other providers like Fremont.

3 **Responding further, subject to and without waiving Defendants' objections: please**  
4 **see documents produced concurrently herewith as DEF010455-DEF010554. Defendants**  
5 **have made diligent efforts to respond to this Request, but reserve the right to**  
6 **supplement their response and objections.**

7 Dated this 22nd day of October, 2020.

8  
9 /s/ Brittany M. Llewellyn

10 D. Lee Roberts, Jr., Esq.

11 Colby L. Balkenbush, Esq.

12 Brittany M. Llewellyn, Esq.

13 WEINBERG, WHEELER, HUDGINS,

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19 *Attorneys for Defendants*

036018

WEINBERG WHEELER  
HUDGINS GUNN & DIAL

036018

**CERTIFICATE OF SERVICE**

I hereby certify that on the 22nd day of October, 2020, a true and correct copy of the foregoing **DEFENDANTS' SIXTH SUPPLEMENTAL RESPONSES TO FREMONT EMERGENCY SERVICES (MANDAVIA) LTD.'S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS** was electronically served on counsel through the Court's electronic service system pursuant to Administrative Order 14-2 and N.E.F.C.R. 9, via the electronic mail addresses noted below, unless service by another method is stated or noted:

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 GUNN & DIAL, LLC

036019

WEINBERG WHEELER  
HUDGINS GUNN & DIAL



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# EXHIBIT 14

ELECTRONICALLY SERVED  
11/6/2020 7:48 PM

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9 *Attorneys for Defendants*

10 **DISTRICT COURT**

11 **CLARK COUNTY, NEVADA**

12  
13 FREMONT EMERGENCY SERVICES  
(MANDAVIA), LTD., a Nevada professional  
14 corporation; TEAM PHYSICIANS OF  
NEVADA-MANDAVIA, P.C., a Nevada  
15 professional corporation; CRUM, STEFANKO  
AND JONES, LTD. dba RUBY CREST  
16 EMERGENCY MEDICINE, a Nevada  
professional corporation,

17 Plaintiffs,

18 vs.

19 UNITEDHEALTH GROUP, INC., a Delaware  
corporation; UNITED HEALTHCARE  
20 INSURANCE COMPANY, a Connecticut  
corporation; UNITED HEALTH CARE  
21 SERVICES INC., dba UNITEDHEALTHCARE,  
a Minnesota corporation; UMR, INC., dba  
22 UNITED MEDICAL RESOURCES, a Delaware  
corporation; OXFORD HEALTH PLANS, INC., a  
23 Delaware corporation; SIERRA HEALTH AND  
LIFE INSURANCE COMPANY, INC., a Nevada  
24 corporation; SIERRA HEALTH-CARE  
OPTIONS, INC., a Nevada corporation; HEALTH  
25 PLAN OF NEVADA, INC., a Nevada  
corporation; DOES 1-10; ROE ENTITIES 11-20,

26 Defendants.

27  
28 ///

Case No.: A-19-792978-B

Dept. No.: 27

**DEFENDANTS' ELEVENTH  
SUPPLEMENTAL RESPONSES TO  
FREMONT EMERGENCY SERVICES  
(MANDAVIA) LTD.'S FIRST SET OF  
REQUESTS FOR PRODUCTION OF  
DOCUMENTS**



1 Defendants UnitedHealth Group, Inc., UnitedHealthcare Insurance Company, United  
2 HealthCare Services Inc., UMR, Inc., Oxford Health Plans, Inc., Sierra Health and Life  
3 Insurance Co., Inc., Sierra Health-Care Options, Inc., and Health Plan of Nevada, Inc. ("United  
4 HealthCare"), by and through their attorneys of the law firm of Weinberg Wheeler Hudgins  
5 Gunn & Dial, LLC, hereby submit these supplemental responses to Plaintiff's ("Plaintiff" or  
6 "Fremont") First Set of Requests for Production of Documents ("Requests") as follows  
7 **(supplemental responses in bold):**

8 **PRELIMINARY STATEMENT**

9 Defendants have made diligent efforts to respond to the Requests, but reserve the right  
10 to change, amend, or supplement their responses and objections. Defendants also reserve the  
11 right to use discovered documents and documents now known, but whose relevance,  
12 significance, or applicability has not yet been ascertained. Additionally, Defendants do not  
13 waive their right to assert any and all applicable privileges, doctrines, and protections, and  
14 hereby expressly state their intent and reserve their right to withhold responsive information  
15 on the basis of any and all applicable privileges, doctrines, and protections.

16 Defendants' responses are made without in any way waiving or intending to waive, but on  
17 the contrary, intending to preserve and preserving, their right, in this litigation or any subsequent  
18 proceeding, to object on any grounds to the use of documents produced in response to the  
19 Request, including objecting on the basis of authenticity, foundation, relevancy, materiality,  
20 privilege, and admissibility of any documents produced in response to the Requests.

21 The documents produced in conjunction with these supplemental responses are being  
22 produced subject to the confidentiality and attorneys' eyes only protections permitted pursuant to  
23 Section 3(f) of the Stipulation and Order Re: Pending Matters that was entered on May 15, 2020  
24 and pursuant to the terms of Confidentiality and Protective Order that the Parties are currently in  
25 the process of negotiating.

26 Defendants are limiting their responses to the Requests to the reasonable time-frame  
27 of July 1, 2017 to present ("Relevant Period") and object to the Requests to the extent that  
28 Plaintiff fails to limit the Requests to a specific time period.

**SPECIFIC OBJECTIONS TO PLAINTIFF'S DEFINITIONS, INSTRUCTIONS,  
AND RULES OF CONSTRUCTION**

1  
2  
3 1. Defendants object to the "Instructions," "Definitions," and "Rules of  
4 Construction" accompanying the Requests to the extent they purport to impose any obligation  
5 on Defendants different from or greater than those imposed by the Nevada Rules of Civil  
6 Procedure.

7 2. Defendants object to the "Instructions," "Definitions," and "Rules of  
8 Construction" to the extent they purport to require the production of Protected Health  
9 Information or other confidential or proprietary information without confidentiality  
10 protections sufficient to protect such information from disclosure, such as those found in the  
11 Confidentiality and Protective Order entered on June 24, 2020.

12 3. Defendants object to the definition of "Claim" or "Claims" as vague, not  
13 described with reasonable particularity, overbroad, unduly burdensome, not relevant to the  
14 claims or defenses in this case, and not proportional to the needs of this case to the extent  
15 they (1) include claims not specifically identified by Plaintiff in FESM000011, or (2) relate  
16 to claims, patients, or health benefits plans for which Defendants are not responsible for the  
17 at-issue claims administration.

18 4. Defendants object to the definition of "Data iSight" as vague, not described with  
19 reasonable particularity, overbroad, unduly burdensome, not relevant to the claims or defenses  
20 in this case, and not proportional to the needs of this case. Defendants contend that Plaintiff  
21 does not fully or accurately describe Data iSight, which is a service offered by MultiPlan, Inc.  
22 that provides pricing information concerning medical claims.

23 5. Defendants object to the definition of "Document," "Communication," and  
24 "Communicate" to the extent those terms include within their scope materials, at to the  
25 Requests, to the extent they seek documents or information protected by the attorney-client  
26 privilege, the attorney work product doctrine, the settlement privilege, or any other applicable  
27 privilege, including, but not limited to: information that was prepared for, or in anticipation of,  
28 litigation; that contains or reflects the analysis, mental impressions, or work of counsel; that



1 contains or reflects attorney-client communications; or that is otherwise privileged.

2           6. Defendants object to the definition of the terms "Defendants," as used in the  
3 context of the Requests, and "You," and/or "Your" as vague, not described with reasonable  
4 particularity, overbroad, unduly burdensome, not proportional to the needs of the case, and  
5 seeking information that is not relevant to the outcome of any claims or defenses in this  
6 litigation. Plaintiff's definition includes, for example, "predecessors-in-interest," "partners,"  
7 "any past or present agents," and "every person acting or purporting to act, or who has ever  
8 acted or purported to act, on their behalf," which suggests that Plaintiff seeks materials  
9 beyond Defendants' possession, custody, or control. Defendants will not search for or  
10 produce materials beyond their possession, custody, or control. Defendants have answered  
11 the Requests on behalf of Defendants, *as defined herein*, only based upon Defendants'  
12 knowledge, materials and information in Defendants' possession, and belief formed after  
13 reasonable inquiry.

14           7. Defendants object to the definition of "Fremont" as vague, not described with  
15 reasonable particularity, overbroad, unduly burdensome, not proportional to the needs of the  
16 case, and seeking information that is not relevant to the outcome of any claims or defenses  
17 in this litigation Plaintiff's definition includes, for example, "any past or present agents,"  
18 "representatives," "partners," "predecessors-in-interest," "affiliates," and "every person  
19 acting or purporting to act, or who has ever acted or purported to act, on [its] behalf" without  
20 identifying these entities or persons with reasonable particularity, and creating an undue  
21 burden by requiring Defendants to identify them. In responding to the Requests, Defendants  
22 will construe "Fremont" to refer to those parties who were known to have been affiliated  
23 with Fremont Emergency Services (Mandavia), Ltd. during the Relevant Period.

24           8. Defendants object to the definition of "Emergency Services and Care,"  
25 "Emergency Medicine Services," and "Emergency Department Services" as vague, not  
26 described with reasonable particularity, overbroad, unduly burdensome, not relevant to the  
27 claims or defenses in this case, and not proportional to the needs of this case to the extent they  
28 (1) include any medical services not related to the at-issue claims, or (2) relate to any medical



1 services for claims, patients, or health benefits plans for which Defendants are not responsible  
2 for the at-issue claims administration.

3 9. Defendants object to the definition of "Nonemergency Services and Care" as  
4 vague, not described with reasonable particularity, overbroad, unduly burdensome, not  
5 relevant to the claims or defenses in this case, and not proportional to the needs of this case  
6 to the extent it (1) includes services by not related to the at-issue claims, or (2) relates to the  
7 services for claims, patients, or health benefits plans for which Defendants are not  
8 responsible for the at-issue claims administration.

9 10. Defendants object to the definition of "Non-Participating Provider," "Non-  
10 Network Provider," "Participating Provider," and "Network Provider" as vague, not  
11 described with reasonable particularity, overbroad, unduly burdensome, not relevant to the  
12 claims or defenses in this case, and not proportional to the needs of this case to the extent  
13 they (1) include persons or entities that are not parties to this case, or (2) concern persons or  
14 entities unrelated to the at-issue claims.

15 11. Defendants object to the definition of "Plans" and "Plan Members" as vague,  
16 not described with reasonable particularity, overbroad, unduly burdensome, not relevant to  
17 the claims or defenses in this case, and not proportional to the needs of this case to the  
18 extent they (1) include health benefits plans and members of such plans not specifically  
19 identified by Plaintiff, (2) include health benefits plans that are not related to the at-issue  
20 claims, or (3) are referring to health benefits plans for which Defendants are not responsible  
21 for the at-issue claims administration.

22 12. Defendants object to the definition of "Provider" as vague, not described with  
23 reasonable particularity, overbroad, unduly burdensome, not relevant to the claims or defenses  
24 in this case, and not proportional to the needs of this case to the extent it (1) includes persons  
25 or entities that are not parties to this case, or (2) concern persons or entities unrelated to the  
26 at-issue claims.

27 13. Defendants object to Instruction No. 1 as vague and not described with reasonable  
28 particularity, as it uses the term Defendant, in the singular, without defining which of the

1 Defendants it is referring to. Defendants also object to Instruction No. 1 to the extent it seeks to  
2 impose obligations and/or penalties on Defendants beyond what is contemplated by the Nevada  
3 Rules of Civil Procedure or applicable local rules.

4 14. Defendants object to Instruction Nos. 2, 3, 4, 5, 6, 7, and 8 to the extent they seek  
5 to impose obligations and/or penalties on Defendants beyond what is contemplated by the  
6 Nevada Rules of Civil Procedure.

7 15. Defendants object to Instruction No. 9 as unduly burdensome and not  
8 proportional to the needs of the case insofar as it asks Defendants to provide "[for each  
9 document produced, identify the specific document request number or numbers to which the  
10 document is responsive." Defendants also object to Instruction No. 9 to the extent it seeks to  
11 impose obligations and/or penalties on Defendants beyond what is contemplated by the  
12 Nevada Rules of Civil Procedure.

13 16. Defendants object to Instruction Nos. 10, 11, and 12 to the extent they seek to  
14 impose obligations and/or penalties on Defendants beyond what is contemplated by the Nevada  
15 Rules of Civil Procedure.

16 17. Defendants object to Instruction No. 13 as unduly burdensome and not  
17 proportional to the needs of the case insofar as it asks Defendants to provide the name of  
18 "the person you believe to have possession of the missing documents, and the facts upon  
19 which you base your response." Defendants also object to Instruction No. 13 to the extent it  
20 seeks to impose obligations and/or penalties on Defendants beyond what is contemplated by  
21 the Nevada Rules of Civil Procedure.

22 **RESPONSES TO REQUESTS FOR PRODUCTION OF DOCUMENTS**

23 **REQUEST FOR PRODUCTION NO. 7:**

24 Produce any and all Documents and/or Communications supporting or relating to Your  
25 contention or belief that You are entitled to pay or allow less than Fremont's full billed charges  
26 for any of the CLAIMS.

27 ///

28 ///

1 **RESPONSE:**

2 Subject to and without waiving Defendants' objections, including Defendants' specific  
3 objections to Plaintiff's Definitions, Instructions and Rules of Construction, Defendants state as  
4 follows: Defendants object that the term "CLAIM" is vague, as noted in Defendants' objections  
5 to Plaintiff's Definitions, as the definition does not identify what specific list of claims it is  
6 referring to. However, Defendants interpret this Request as referring to the claims listed in  
7 FESM000011. Assuming those are the claims Plaintiff intended to refer to, Defendants object  
8 to this Request on the basis that it is unduly burdensome and seeks information that is not  
9 proportional to the needs of the case. Plaintiff has asserted 15,210 CLAIMS where it alleges that  
10 Defendants did not reimburse Plaintiff for the full amount billed. To produce the documents and  
11 communications related to any decision to pay or allow less than Plaintiff's full billed charges on  
12 a CLAIM, Defendants would, among other things, have to pull the administrative record for each  
13 of the 15,210 individual CLAIMS, review the records for privileged/protected information and  
14 then produce them. As explained more fully in the burden declaration attached as Exhibit 1, this  
15 would be unduly burdensome as Defendants believe it will take 2 hours to pull each individual  
16 claim file for a total of 30,420 hours of employee labor.

17 Moreover, the request is overbroad, unduly burdensome, not reasonably particular, and  
18 not proportional to the needs of the case as it essentially requests all documents related to the  
19 parties' claims and defenses. It would be essentially impossible for Defendants to perform the  
20 investigation necessary to identify all documents and communications that in some way relate to  
21 the decision to not pay the full billed charges on all of the 15,210 CLAIMS.

22 Responding further, subject to and without waiving Defendants' objections: please see  
23 documents produced concurrently herewith as DEF010455-DEF010554.

24 Responding further, subject to and without waiving Defendants' objections: please see  
25 documents previously produced as DEF000722-DEF000854, and documents produced  
26 concurrently herewith as DEF011090-DEF011210, DEF011295-DEF011382, DEF011384-  
27 DEF011396, and DEF011411-DEF011446.

28 ///

1           **Responding further, subject to and without waiving Defendants' objections: please**  
2 **see documents produced concurrently herewith as DEF030190–DEF030300. Defendants**  
3 **have made diligent efforts to respond to the Requests, but reserve the right to**  
4 **supplement their responses and objections.**

5 **REQUEST FOR PRODUCTION NO. 9:**

6           If you contend that any agreement(s) by and between You and Fremont entitles You to  
7 pay less than Fremont's full billed charges for any of the CLAIMS, or is otherwise relevant to  
8 the amounts paid for any of the CLAIMS, produce any Documents and/or Communications  
9 relating to any agreements(s).

10 **RESPONSE:**

11           Subject to and without waiving Defendants' objections, including Defendants' specific  
12 objections to Plaintiff's Definitions, Instructions and Rules of Construction, Defendants state as  
13 follows: During the time period after which Fremont became a non-participating, out-of-network  
14 provider, Defendants are not currently aware of any direct written participation agreement  
15 between Defendants and Fremont that would govern the amount of reimbursement (if any) for  
16 the CLAIMS. However, there may be other contracts/agreements that governed the amount of  
17 reimbursement for each CLAIM, including, but not limited to, the applicable health benefits plan  
18 documents. Defendants are continuing to attempt to determine whether any such  
19 contracts/agreements exist and will supplement this response, if any such contracts or  
20 agreements are found.

21           Responding further, subject to and without waiving Defendants' objections: please see  
22 documents produced concurrently herewith as DEF11295–DEF011382, DEF011384–  
23 DEF011396, and DEF011411–DEF011446.

24           **Responding further, subject to and without waiving Defendants' objections: please**  
25 **see documents produced concurrently herewith as DEF030190–DEF030262. Defendants**  
26 **have made diligent efforts to respond to the Requests, but reserve the right to**  
27 **supplement their responses and objections.**

28 **///**

1 **REQUEST FOR PRODUCTION NO. 18:**

2 All documents and/or communications regarding the rational, basis, or justification for  
3 the reduced rates for emergency services proposed to Fremont in or around 2017 to Present.

4 **RESPONSE:**

5 Subject to and without waiving Defendants' objections, including Defendants' specific  
6 objections to Plaintiff's Definitions, Instructions and Rules of Construction, Defendants state as  
7 follows: Defendants object to this Request on the basis that it is unduly burdensome and seeks  
8 information that is not proportional to the needs of the case. Fremont has asserted 15,210 claims  
9 where it alleges that Defendants did not reimburse Fremont for the full amount billed. To  
10 produce the documents related to why those claims were paid at a particulate rate, Defendants  
11 would, among other things, have to pull the administrative record for each of the 15,210  
12 individual CLAIMS, review the records for privileged/protected information and then produce  
13 them. As explained more fully in the burden declaration attached as Exhibit 1, this would be  
14 unduly burdensome as Defendants believe it will take 2 hours to pull each individual claim file  
15 for a total of 30,420 hours of employee labor.

16 Moreover, the request is overbroad, unduly burdensome, not reasonably particular, and  
17 not proportional to the needs of the case as it essentially requests all documents related to the  
18 parties' claims and defenses. It would be essentially impossible for Defendants to perform the  
19 investigation necessary to identify all documents and communications that in someway relate to  
20 the justification for the payments made on all of the 15,210 CLAIMS.

21 Responding further, subject to and without waiving Defendants' objections: please see  
22 documents produced concurrently herewith as DEF010455-DEF010554.

23 Responding further, subject to and without waiving Defendants' objections: please see  
24 documents produced concurrently herewith as DEF011276-DEF011279, DEF011295-  
25 DEF011410.

26 **Responding further, subject to and without waiving Defendants' objections: please**  
27 **see documents produced concurrently herewith as DEF030190-DEF030262. Defendants**  
28 **have made diligent efforts to respond to the Requests, but reserve the right to**

1 supplement their responses and objections.

2 **REQUEST FOR PRODUCTION NO. 33:**

3 Produce any and all Documents and/or Communications regarding Your reimbursement  
4 rates paid or to be paid to out-of-network Emergency Medicine Groups and/or Complaints about  
5 Your level of payment for Emergency Medicine Services and/or Emergency Department  
6 Services received from out-of-network providers.

7 **RESPONSE:**

8 Subject to and without waiving Defendants' objections, including Defendants' specific  
9 objections to Plaintiff's Definitions, Instructions and Rules of Construction, Defendants state as  
10 follows:

11 Defendants object that this Request is overbroad, unduly burdensome and seeks  
12 information that is not relevant to Plaintiff's claims and not proportional to the needs of the case.  
13 This Request seeks a substantial amount of information regarding Defendants' rates of  
14 reimbursement to numerous non-parties which has no relevance to Plaintiff's claims.  
15 Defendants further object that this Request is overbroad since it is not limited to any specific  
16 time period. The term "Complaints" is also vague and overbroad, as noted in Defendants'  
17 objections to Plaintiff's Definitions. Indeed, as written, this Request appears to call for  
18 Defendants to produce any communication from any out of network provider to Defendants  
19 where the provider complains in any way about payment, regardless of when that communication  
20 was sent. There are likely hundreds of thousands if not millions of documents that could be  
21 responsive to this Request.

22 Defendants also object that this Request improperly asks that they reveal information  
23 about their agreements with other providers. Defendants' agreements with other providers  
24 typically contain confidentiality clauses such that producing these agreements could force  
25 Defendants to breach their obligations to these third parties. Moreover, the information sought is  
26 proprietary and subject to protection as a trade secret pursuant to NRS 600A.030(5) as this  
27 information has independent value due to, among other things, the fact that it is not known to  
28 other providers like Fremont.

1 Responding further, subject to and without waiving Defendants' objections: please see  
2 document produced concurrently herewith as DEF010558.

3 Responding further, subject to and without waiving Defendants' objections: please see  
4 documents produced concurrently herewith as DEF011211, and DEF011274–DEF011275.

5 **Responding further, subject to and without waiving Defendants' objections: please**  
6 **see documents produced concurrently herewith as DEF030301–DEF030406, and**  
7 **DEF030407–DEF030457.**

8 **Defendants have made diligent efforts to respond to this Request, but reserve the**  
9 **right to supplement their response and objections.**

10 **REQUEST FOR PRODUCTION NO. 41:**

11 Produce any and all Documents and/or Communications regarding any challenges by any  
12 other non-participating Emergency Medicine Group and/or any non-participating hospital or  
13 other non-participating provider of Emergency Department Services of the appropriateness of the  
14 reimbursement rates paid by You for Emergency Medicine Services and/or Emergency  
15 Department Services rendered to Your Plan Members from January 1, 2016, to the present.

16 **RESPONSE:**

17 Subject to and without waiving Defendants' objections, including Defendants' specific  
18 objections to Plaintiff's Definitions, Instructions and Rules of Construction, Defendants state as  
19 follows:

20 Defendants object that this Request is overbroad, unduly burdensome and seeks  
21 information that is not relevant to Plaintiff's claims and not proportional to the needs of the case.  
22 This Request seeks "all documents and/or communications" relating to challenges by non-parties  
23 to Defendants' rates of reimbursement. Such information has no relevance to Plaintiff's claims.  
24 Defendants further object that this Request is overbroad since it seeks information from prior to  
25 July 1, 2017, the date of the earliest claim asserted by Plaintiff. The term "challenges" is also  
26 vague and overbroad in that it is unclear what type of challenges are intended to be encompassed  
27 by it (i.e. legal complaint, administrative appeals, other types of "challenges," etc.). Indeed, as  
28 written, this Request could be read to call for Defendants to produce any communication from

1 any out of network provider to Defendants where the provider complains in any way about  
2 payment.

3 Responding further, subject to and without waiving Defendants' objections: please see  
4 document produced concurrently herewith as DEF011211.

5 **Responding further, subject to and without waiving Defendants' objections: please**  
6 **see documents produced concurrently herewith as DEF030301–DEF030406, and**  
7 **DEF030407–DEF030457.**

8 **Defendants have made diligent efforts to respond to this Request, but reserve the**  
9 **right to supplement their response and objections.**

10 **REQUEST FOR PRODUCTION NO. 45:**

11 Produce any and all Documents and/or Communications supporting, refuting, or relating  
12 to Your affirmative defenses identified in Your Answers to Fremont's First Set of Interrogatories  
13 to Defendants.

14 **RESPONSE:**

15 Subject to and without waiving Defendants' objections, including Defendants' specific  
16 objections to Plaintiff's Definitions, Instructions and Rules of Construction, Defendants state as  
17 follows:

18 Defendants object that this Request is premature as the Defendants are not required to file  
19 an Answer to the Complaint yet and are thus not required to produce documents relating to their  
20 affirmative defenses at this time. Defendants further object that this Request seeks disclosure of  
21 information protected by the attorney work-product doctrine. Defendants will supplement this  
22 response within a reasonable time after filing their Answer to the Complaint.

23 Responding further, subject to and without waiving Defendants' objections: please see  
24 documents produced as DEF028027–DEF030189.

25 **Responding further, subject to and without waiving Defendants' objections: please**  
26 **see documents previously produced as DEF011295–DEF011382, DEF011394–DEF011396,**  
27 **DEF011411–DEF011446, and documents produced concurrently herewith as DEF030190–**  
28 **DEF030300.**



Dated this 6<sup>th</sup> day of November, 2020.

036033

**CERTIFICATE OF SERVICE**


I hereby certify that on the 6<sup>th</sup> day of November, 2020, a true and correct copy of the foregoing **DEFENDANTS' ELEVENTH SUPPLEMENTAL RESPONSES TO FREMONT EMERGENCY SERVICES (MANDAVIA) LTD.'S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS** was electronically served on counsel through the Court's electronic service system pursuant to Administrative Order 14-2 and N.E.F.C.R. 9, via the electronic mail addresses noted below, unless service by another method is stated or noted:

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 Kristen T. Gallagher, Esq.  
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*Attorneys for Plaintiffs*

/s/ Audra R. Bonney  
 An employee of WEINBERG, WHEELER, HUDGINS  
 GUNN & DIAL, LLC

036034

WEINBERG WHEELER  
HUDGINS GUNN & DIAL



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# EXHIBIT 15

ELECTRONICALLY SERVED  
12/14/2020 7:13 PM

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Los Angeles, CA 90071

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**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

FREMONT EMERGENCY SERVICES  
(MANDAVIA), LTD., a Nevada professional  
corporation; TEAM PHYSICIANS OF  
NEVADA-MANDAVIA, P.C., a Nevada  
professional corporation; CRUM, STEFANKO  
AND JONES, LTD. dba RUBY CREST  
EMERGENCY MEDICINE, a Nevada  
professional corporation,

Plaintiffs,

vs.

UNITEDHEALTH GROUP, INC., a Delaware  
corporation; UNITED HEALTHCARE  
INSURANCE COMPANY, a Connecticut  
corporation; UNITED HEALTH CARE  
SERVICES INC., dba UNITEDHEALTHCARE,  
a Minnesota corporation; UMR, INC., dba  
UNITED MEDICAL RESOURCES, a Delaware  
corporation; OXFORD HEALTH PLANS, INC., a  
Delaware corporation; SIERRA HEALTH AND  
LIFE INSURANCE COMPANY, INC., a Nevada  
corporation; SIERRA HEALTH-CARE  
OPTIONS, INC., a Nevada corporation; HEALTH  
PLAN OF NEVADA, INC., a Nevada  
corporation; DOES 1-10; ROE ENTITIES 11-20,

Defendants.

Case No.: A-19-792978-B

Dept. No.: 27

**DEFENDANTS' FOURTEENTH  
SUPPLEMENTAL RESPONSES TO  
FREMONT EMERGENCY SERVICES  
(MANDAVIA) LTD.'S FIRST SET OF  
REQUESTS FOR PRODUCTION OF  
DOCUMENTS**



1 Defendants UnitedHealth Group, Inc., UnitedHealthcare Insurance Company, United  
2 HealthCare Services Inc., UMR, Inc., Oxford Health Plans, Inc., Sierra Health and Life  
3 Insurance Co., Inc., Sierra Health-Care Options, Inc., and Health Plan of Nevada, Inc. ("United  
4 HealthCare"), by and through their attorneys of the law firm of Weinberg Wheeler Hudgins  
5 Gunn & Dial, LLC, hereby submit these supplemental responses to Plaintiff's ("Plaintiff" or  
6 "Fremont") First Set of Requests for Production of Documents ("Requests") as follows  
7 **(supplemental responses in bold):**

8 **PRELIMINARY STATEMENT**

9 Defendants have made diligent efforts to respond to the Requests, but reserve the right  
10 to change, amend, or supplement their responses and objections. Defendants also reserve the  
11 right to use discovered documents and documents now known, but whose relevance,  
12 significance, or applicability has not yet been ascertained. Additionally, Defendants do not  
13 waive their right to assert any and all applicable privileges, doctrines, and protections, and  
14 hereby expressly state their intent and reserve their right to withhold responsive information  
15 on the basis of any and all applicable privileges, doctrines, and protections.

16 Defendants' responses are made without in any way waiving or intending to waive, but on  
17 the contrary, intending to preserve and preserving, their right, in this litigation or any subsequent  
18 proceeding, to object on any grounds to the use of documents produced in response to the  
19 Request, including objecting on the basis of authenticity, foundation, relevancy, materiality,  
20 privilege, and admissibility of any documents produced in response to the Requests.

21 The documents produced in conjunction with these responses are being produced subject  
22 to the terms of Confidentiality and Protective Order entered on June 24, 2020.

23 Defendants are limiting their responses to the Requests to the reasonable time-frame  
24 of July 1, 2017 to present ("Relevant Period") and object to the Requests to the extent that  
25 Plaintiff fails to limit the Requests to a specific time period.

26 ///

27 ///

28 ///

**SPECIFIC OBJECTIONS TO PLAINTIFF'S DEFINITIONS, INSTRUCTIONS,  
AND RULES OF CONSTRUCTION**

1  
2  
3       1.       Defendants object to the "Instructions," "Definitions," and "Rules of  
4 Construction" accompanying the Requests to the extent they purport to impose any obligation  
5 on Defendants different from or greater than those imposed by the Nevada Rules of Civil  
6 Procedure.

7       2.       Defendants object to the "Instructions," "Definitions," and "Rules of  
8 Construction" to the extent they purport to require the production of Protected Health  
9 Information or other confidential or proprietary information without confidentiality  
10 protections sufficient to protect such information from disclosure, such as those found in the  
11 Confidentiality and Protective Order entered on June 24, 2020.

12       3.       Defendants object to the definition of "Claim" or "Claims" as vague, not  
13 described with reasonable particularity, overbroad, unduly burdensome, not relevant to the  
14 claims or defenses in this case, and not proportional to the needs of this case to the extent  
15 they (1) include claims not specifically identified by Plaintiff in FESM000344, or (2) relate  
16 to claims, patients, or health benefits plans for which Defendants are not responsible for the  
17 at-issue claims administration.

18       4.       Defendants object to the definition of "Data iSight" as vague, not described with  
19 reasonable particularity, overbroad, unduly burdensome, not relevant to the claims or defenses  
20 in this case, and not proportional to the needs of this case. Defendants contend that Plaintiff  
21 does not fully or accurately describe Data iSight, which is a service offered by MultiPlan, Inc.  
22 that provides pricing information concerning medical claims.

23       5.       Defendants object to the definition of "Document," "Communication," and  
24 "Communicate" to the extent those terms include within their scope materials, at to the  
25 Requests, to the extent they seek documents or information protected by the attorney-client  
26 privilege, the attorney work product doctrine, the settlement privilege, or any other applicable  
27 privilege, including, but not limited to: information that was prepared for, or in anticipation of,  
28 litigation; that contains or reflects the analysis, mental impressions, or work of counsel; that

1 contains or reflects attorney-client communications; or that is otherwise privileged.

2           6. Defendants object to the definition of the terms "Defendants," as used in the  
3 context of the Requests, and "You," and/or "Your" as vague, not described with reasonable  
4 particularity, overbroad, unduly burdensome, not proportional to the needs of the case, and  
5 seeking information that is not relevant to the outcome of any claims or defenses in this  
6 litigation. Plaintiff's definition includes, for example, "predecessors-in-interest," "partners,"  
7 "any past or present agents," and "every person acting or purporting to act, or who has ever  
8 acted or purported to act, on their behalf," which suggests that Plaintiff seeks materials  
9 beyond Defendants' possession, custody, or control. Defendants will not search for or  
10 produce materials beyond their possession, custody, or control. Defendants have answered  
11 the Requests on behalf of Defendants, *as defined herein*, only based upon Defendants'  
12 knowledge, materials and information in Defendants' possession, and belief formed after  
13 reasonable inquiry.

14           7. Defendants object to the definition of "Fremont" as vague, not described with  
15 reasonable particularity, overbroad, unduly burdensome, not proportional to the needs of the  
16 case, and seeking information that is not relevant to the outcome of any claims or defenses  
17 in this litigation Plaintiff's definition includes, for example, "any past or present agents,"  
18 "representatives," "partners," "predecessors-in-interest," "affiliates," and "every person  
19 acting or purporting to act, or who has ever acted or purported to act, on [its] behalf" without  
20 identifying these entities or persons with reasonable particularity, and creating an undue  
21 burden by requiring Defendants to identify them. In responding to the Requests, Defendants  
22 will construe "Fremont" to refer to those parties who were known to have been affiliated  
23 with Fremont Emergency Services (Mandavia), Ltd. during the Relevant Period.

24           8. Defendants object to the definition of "Emergency Services and Care,"  
25 "Emergency Medicine Services," and "Emergency Department Services" as vague, not  
26 described with reasonable particularity, overbroad, unduly burdensome, not relevant to the  
27 claims or defenses in this case, and not proportional to the needs of this case to the extent they  
28 (1) include any medical services not related to the at-issue claims, or (2) relate to any medical

1 services for claims, patients, or health benefits plans for which Defendants are not responsible  
2 for the at-issue claims administration.

3 9. Defendants object to the definition of "Nonemergency Services and Care" as  
4 vague, not described with reasonable particularity, overbroad, unduly burdensome, not  
5 relevant to the claims or defenses in this case, and not proportional to the needs of this case  
6 to the extent it (1) includes services by not related to the at-issue claims, or (2) relates to the  
7 services for claims, patients, or health benefits plans for which Defendants are not  
8 responsible for the at-issue claims administration.

9 10. Defendants object to the definition of "Non-Participating Provider," "Non-  
10 Network Provider," "Participating Provider," and "Network Provider" as vague, not  
11 described with reasonable particularity, overbroad, unduly burdensome, not relevant to the  
12 claims or defenses in this case, and not proportional to the needs of this case to the extent  
13 they (1) include persons or entities that are not parties to this case, or (2) concern persons or  
14 entities unrelated to the at-issue claims.

15 11. Defendants object to the definition of "Plans" and "Plan Members" as vague,  
16 not described with reasonable particularity, overbroad, unduly burdensome, not relevant to  
17 the claims or defenses in this case, and not proportional to the needs of this case to the  
18 extent they (1) include health benefits plans and members of such plans not specifically  
19 identified by Plaintiff, (2) include health benefits plans that are not related to the at-issue  
20 claims, or (3) are referring to health benefits plans for which Defendants are not responsible  
21 for the at-issue claims administration.

22 12. Defendants object to the definition of "Provider" as vague, not described with  
23 reasonable particularity, overbroad, unduly burdensome, not relevant to the claims or defenses  
24 in this case, and not proportional to the needs of this case to the extent it (1) includes persons  
25 or entities that are not parties to this case, or (2) concern persons or entities unrelated to the  
26 at-issue claims.

27 13. Defendants object to Instruction No. 1 as vague and not described with reasonable  
28 particularity, as it uses the term Defendant, in the singular, without defining which of the



1 Defendants it is referring to. Defendants also object to Instruction No. 1 to the extent it seeks to  
2 impose obligations and/or penalties on Defendants beyond what is contemplated by the Nevada  
3 Rules of Civil Procedure or applicable local rules.

4 14. Defendants object to Instruction Nos. 2, 3, 4, 5, 6, 7, and 8 to the extent they seek  
5 to impose obligations and/or penalties on Defendants beyond what is contemplated by the  
6 Nevada Rules of Civil Procedure.

7 15. Defendants object to Instruction No. 9 as unduly burdensome and not  
8 proportional to the needs of the case insofar as it asks Defendants to provide "[for each  
9 document produced, identify the specific document request number or numbers to which the  
10 document is responsive." Defendants also object to Instruction No. 9 to the extent it seeks to  
11 impose obligations and/or penalties on Defendants beyond what is contemplated by the  
12 Nevada Rules of Civil Procedure.

13 16. Defendants object to Instruction Nos. 10, 11, and 12 to the extent they seek to  
14 impose obligations and/or penalties on Defendants beyond what is contemplated by the Nevada  
15 Rules of Civil Procedure.

16 17. Defendants object to Instruction No. 13 as unduly burdensome and not  
17 proportional to the needs of the case insofar as it asks Defendants to provide the name of  
18 "the person you believe to have possession of the missing documents, and the facts upon  
19 which you base your response." Defendants also object to Instruction No. 13 to the extent it  
20 seeks to impose obligations and/or penalties on Defendants beyond what is contemplated by  
21 the Nevada Rules of Civil Procedure.

22 **RESPONSES TO REQUESTS FOR PRODUCTION OF DOCUMENTS**

23 **REQUEST FOR PRODUCTION NO. 3:**

24 Produce any and all Documents and/or Communications between You and Fremont  
25 regarding any of the CLAIMS.

26 **RESPONSE:**

27 Subject to and without waiving Defendants' objections, including Defendants' specific  
28 objections to Plaintiff's Definitions, Instructions and Rules of Construction, Defendants state as

1 follows:

2 Defendants object that the term “CLAIM” is vague, as noted in Defendants’ objections to  
3 Plaintiff’s Definitions, as the definition does not identify what specific list of claims it is  
4 referring to. However, Defendants interpret this Request as referring to the claims listed in  
5 FESM000344. Assuming those are the claims Fremont intended to refer to, Defendants object to  
6 this Request on the basis that it is unduly burdensome and seeks information that is not  
7 proportional to the needs of the case. Fremont has asserted **22,153 CLAIMS** where it alleges that  
8 Defendants did not reimburse Fremont for the full amount billed. To produce the documents and  
9 communications related to those CLAIMS, Defendants would, among other things, have to pull  
10 the administrative record for each of the **22,153** individual CLAIMS, review the records for  
11 privileged/protected information and then produce them.

12 Defendants further object that all documents and communications exchanged between  
13 Defendants and Fremont would necessarily be possessed by Fremont. There is no justification  
14 for imposing the burden on Defendants to identify, collect, review, and produce such documents  
15 when Fremont already possesses the same.

16 **Responding further, subject to and without waiving Defendants’ objections, please**  
17 **see administrative records produced to date, and documents produced as DEF000154-**  
18 **DEF000156, DEF011295–DEF011321, DEF011322–DEF011338, DEF011339–DEF011356,**  
19 **DEF011357–DEF011376; DEF011380–DEF011382, DEF011394–DEF011396, DEF011377–**  
20 **DEF011379, DEF011380–DEF011382, DEF011394–DEF011396, DEF011411–DEF011436,**  
21 **DEF011437–DEF011446, DEF030190–DEF030249. Defendants have made diligent efforts**  
22 **to respond to this Request, but reserve the right to supplement their response and**  
23 **objections.**

24 **REQUEST FOR PRODUCTION NO. 18:**

25 All documents and/or communications regarding the rational, basis, or justification for  
26 the reduced rates for emergency services proposed to Fremont in or around 2017 to Present.

27 **RESPONSE:**

28 Subject to and without waiving Defendants’ objections, including Defendants’ specific

1 objections to Plaintiff's Definitions, Instructions and Rules of Construction, Defendants state as  
2 follows: Defendants object to this Request on the basis that it is unduly burdensome and seeks  
3 information that is not proportional to the needs of the case. Fremont has asserted 15,210 claims  
4 where it alleges that Defendants did not reimburse Fremont for the full amount billed. To  
5 produce the documents related to why those claims were paid at a particulate rate, Defendants  
6 would, among other things, have to pull the administrative record for each of the 15,210  
7 individual CLAIMS, review the records for privileged/protected information and then produce  
8 them. As explained more fully in the burden declaration attached as Exhibit 1, this would be  
9 unduly burdensome as Defendants believe it will take 2 hours to pull each individual claim file  
10 for a total of 30,420 hours of employee labor.

11 Moreover, the request is overbroad, unduly burdensome, not reasonably particular, and  
12 not proportional to the needs of the case as it essentially requests all documents related to the  
13 parties' claims and defenses. It would be essentially impossible for Defendants to perform the  
14 investigation necessary to identify all documents and communications that in some way relate to  
15 the justification for the payments made on all of the 15,210 CLAIMS.

16 Responding further, subject to and without waiving Defendants' objections: please see  
17 documents produced concurrently herewith as DEF010455-DEF010554.

18 Responding further, subject to and without waiving Defendants' objections: please see  
19 documents produced concurrently herewith as DEF011276-DEF011279, DEF011295-  
20 DEF011410.

21 Responding further, subject to and without waiving Defendants' objections: please see  
22 documents produced concurrently herewith as DEF030190-DEF030262.

23 **Responding further, subject to and without waiving Defendants' objections: please**  
24 **see documents produced concurrently herewith as DEF075426-DEF075428. Defendants**  
25 **have made diligent efforts to respond to this Request, but reserve the right to**  
26 **supplement their response and objections.**

27 **REQUEST FOR PRODUCTION NO. 19:**

28 All documents regarding the Provider charges and/or reimbursement rates that You have

1 paid to Participating or Non-Participating Providers from July 1, 2017, to the present in Nevada.  
2 Without waiving any right to seek further categories of documentation, at this juncture, Fremont  
3 is willing to accept, in lieu of contractual documents, data which is blinded or redacted and/or  
4 aggregated or summarized form.

5 **RESPONSE:**

6 Subject to and without waiving Defendants' objections, including Defendants' specific  
7 objections to Plaintiff's Definitions, Instructions and Rules of Construction, Defendants state as  
8 follows: Defendants object that, even with the limitation proposed by Fremont, this Request is  
9 overbroad, unduly burdensome and seeks irrelevant information that is not proportional to the  
10 needs of the case. It is unclear what the relevance is of documents showing what the amounts  
11 Defendants paid to providers other than Fremont. Depending on, for example, the provider, the  
12 claim at issue, and/or the applicable health benefits plan documents, Defendants use different  
13 methodologies to calculate the allowed amount of reimbursement. The documents sought in this  
14 Request are therefore not relevant to determining the usual and customary rate of reimbursement  
15 for the claims Fremont is asserting in this litigation.

16 To the extent this Request is also seeking documents related to the reimbursement rates  
17 for claims of Fremont as a Non-Participating Provider, Defendants object to this Request on the  
18 basis that it is unduly burdensome and seeks information that is not proportional to the needs of  
19 the case. Fremont has asserted 15,210 claims where it alleges that Defendants did not reimburse  
20 Fremont for the full amount billed. To produce the documents relating to the reimbursement  
21 rates on those claims, Defendants would, among other things, have to pull the administrative  
22 record for each of the 15,210 individual CLAIMS, review the records for privileged/protected  
23 information and then produce them. As explained more fully in the burden declaration attached  
24 as Exhibit 1, this would be unduly burdensome as Defendants believe it will take 2 hours to pull  
25 each individual claim file for a total of 30,420 hours of employee labor.

26 Responding further, subject to and without waiving Defendants' objections: please see  
27 document produced concurrently herewith as DEF010558.

28 Responding further, subject to and without waiving Defendants' objections: please see

1 documents produced concurrently herewith as DEF011274–DEF011275.

2 Responding further, subject to and without waiving Defendants’ objections: please see  
3 documents produced concurrently herewith as DEF045751–DEF045755.

4 Responding further, subject to and without waiving Defendants’ objections: please see  
5 documents produced concurrently herewith as DEF045756–DEF045766.

6 **Responding further, subject to and without waiving Defendants’ objections: please**  
7 **see documents produced concurrently herewith as DEF075426–DEF075428. Defendants**  
8 **have made diligent efforts to respond to this Request, but reserve the right to**  
9 **supplement their response and objections.**

10 **REQUEST FOR PRODUCTION NO. 22:**

11 Produce any and all Documents and/or Communications relating to any analysis of the  
12 usual and customary provider charges for similar services in Nevada for Emergency Medicine  
13 Services.

14 **RESPONSE:**

15 Subject to and without waiving Defendants’ objections, including Defendants’ specific  
16 objections to Plaintiff’s Definitions, Instructions and Rules of Construction, Defendants state as  
17 follows:

18 Defendants object that this Request is vague in regard to what type of “analysis” it is  
19 referring to and vague in regard to what “similar services” it is referring to. Defendants are thus  
20 unable to determine whether they have documents that are responsive to this Request.  
21 Defendants further object that this Request appears to be overbroad, unduly burdensome and  
22 seeks information that is not relevant to Plaintiff’s claims and not proportional to the needs of the  
23 case.

24 Defendants request that Plaintiff meet and confer to narrow the scope of this Request to  
25 ensure that it is not unduly burdensome to Defendants and that Plaintiff is able to get the  
26 information it is seeking.

27 Responding further, subject to and without waiving Defendants’ objections: please see  
28 documents produced concurrently herewith as DEF011274–DEF011279.

1           **Responding further, subject to and without waiving Defendants' objections: please**  
2 **see documents produced concurrently herewith as DEF075426–DEF075428. Defendants**  
3 **have made diligent efforts to respond to this Request, but reserve the right to**  
4 **supplement their response and objections.**

5 **REQUEST FOR PRODUCTION NO. 29:**

6           Produce any and all contracts and participation agreements that You have or had with any  
7 Emergency Medicine Groups and/or any hospitals or other providers of Emergency Department  
8 Services other than Fremont that were in effect at any point from January 1, 2016, through the  
9 present, including all fee or rate schedules and amendments and addendums, and all other  
10 documents reflecting the agreed-upon terms for reimbursement for any product or service.

11 **RESPONSE:**

12           Defendants object to this request for production based on their pending motion to extend  
13 the deadline to respond and based on their pending motion to stay the response deadline.  
14 Defendants reserve the right to assert further objections to this request when they respond to it on  
15 January 29, 2019 or on a different date set by the court.

16           **Responding further, subject to and without waiving Defendants' objections: please**  
17 **see documents produced as DEF010558, DEF011274, DEF011275, DEF045751–**  
18 **DEF045766, and concurrently herewith as DEF075426–DEF075428. Defendants have**  
19 **made diligent efforts to respond to this Request, but reserve the right to supplement**  
20 **their response and objections.**

21 **REQUEST FOR PRODUCTION NO. 30:**

22           Produce any and all Documents and/or Communications between You and any  
23 Emergency Medicine Groups and/or any hospitals or other providers of Emergency Department  
24 Services other than Fremont occurring at any point from January 1, 2016, through the present  
25 relating to negotiations of any reimbursement rates and/or fee schedules for Emergency  
26 Medicine Services and/or Emergency Department Services.

27 **RESPONSE:**

28           Defendants object to this request for production based on their pending motion to extend

1 the deadline to respond and based on their pending motion to stay the response deadline.  
2 Defendants reserve the right to assert further objections to this request when they respond to it on  
3 January 29, 2019 or on a different date set by the court.

4 **Responding further, subject to and without waiving Defendants' objections: please**  
5 **see documents produced as DEF010558, DEF011274, DEF011275, DEF045751–**  
6 **DEF045766, and concurrently herewith as DEF075426–DEF075428. Defendants have**  
7 **made diligent efforts to respond to this Request, but reserve the right to supplement**  
8 **their response and objections.**

9 Dated this 14th day of December, 2020.

11 /s/ Brittany M. Llewellyn

12 D. Lee Roberts, Jr., Esq.  
13 Colby L. Balkenbush, Esq.  
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21 *Attorneys for Defendants*



**CERTIFICATE OF SERVICE**

I hereby certify that on the 14<sup>th</sup> day of December, 2020, a true and correct copy of the foregoing **DEFENDANTS' FOURTEENTH SUPPLEMENTAL RESPONSES TO FREMONT EMERGENCY SERVICES (MANDAVIA) LTD.'S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS** was electronically served on counsel through the Court's electronic service system pursuant to Administrative Order 14-2 and N.E.F.C.R. 9, via the electronic mail addresses noted below, unless service by another method is stated or noted:

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# EXHIBIT 16

1 **RSPN**

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17 *Attorneys for Defendants*18 **DISTRICT COURT**19 **CLARK COUNTY, NEVADA**

20 **FREMONT EMERGENCY SERVICES**  
 21 (MANDAVIA), LTD., a Nevada professional  
 22 corporation; **TEAM PHYSICIANS OF**  
 23 **NEVADA-MANDAVIA, P.C.**, a Nevada  
 24 professional corporation; **CRUM, STEFANKO**  
 25 **AND JONES, LTD. dba RUBY CREST**  
 26 **EMERGENCY MEDICINE**, a Nevada  
 27 professional corporation,

28 Plaintiffs,

vs.

UNITEDHEALTH GROUP, INC., a Delaware  
 corporation; UNITED HEALTHCARE  
 INSURANCE COMPANY, a Connecticut  
 corporation; UNITED HEALTH CARE  
 SERVICES INC., dba UNITEDHEALTHCARE,  
 a Minnesota corporation; UMR, INC., dba  
 UNITED MEDICAL RESOURCES, a Delaware  
 corporation; OXFORD HEALTH PLANS, INC., a  
 Delaware corporation; SIERRA HEALTH AND  
 LIFE INSURANCE COMPANY, INC., a Nevada  
 corporation; SIERRA HEALTH-CARE  
 OPTIONS, INC., a Nevada corporation; HEALTH  
 PLAN OF NEVADA, INC., a Nevada  
 corporation; DOES 1-10; ROE ENTITIES 11-20,

Defendants.

///

Case No.: A-19-792978-B  
 Dept. No.: 27

**DEFENDANTS' TENTH  
 SUPPLEMENTAL RESPONSES TO  
 FREMONT EMERGENCY SERVICES  
 (MANDAVIA) LTD.'S FIRST SET OF  
 REQUESTS FOR PRODUCTION OF  
 DOCUMENTS**

1 Defendants UnitedHealth Group, Inc., UnitedHealthcare Insurance Company, United  
2 HealthCare Services Inc., UMR, Inc., Oxford Health Plans, Inc., Sierra Health and Life  
3 Insurance Co., Inc., Sierra Health-Care Options, Inc., and Health Plan of Nevada, Inc. ("United  
4 HealthCare"), by and through their attorneys of the law firm of Weinberg Wheeler Hudgins  
5 Gunn & Dial, LLC, hereby submit these supplemental responses to Plaintiff's ("Plaintiff" or  
6 "Fremont") First Set of Requests for Production of Documents ("Requests") as follows  
7 **(supplemental responses in bold):**

8 **PRELIMINARY STATEMENT**

9 Defendants have made diligent efforts to respond to the Requests, but reserve the right  
10 to change, amend, or supplement their responses and objections. Defendants also reserve the  
11 right to use discovered documents and documents now known, but whose relevance,  
12 significance, or applicability has not yet been ascertained. Additionally, Defendants do not  
13 waive their right to assert any and all applicable privileges, doctrines, and protections, and  
14 hereby expressly state their intent and reserve their right to withhold responsive information  
15 on the basis of any and all applicable privileges, doctrines, and protections.

16 Defendants' responses are made without in any way waiving or intending to waive, but on  
17 the contrary, intending to preserve and preserving, their right, in this litigation or any subsequent  
18 proceeding, to object on any grounds to the use of documents produced in response to the  
19 Request, including objecting on the basis of authenticity, foundation, relevancy, materiality,  
20 privilege, and admissibility of any documents produced in response to the Requests.

21 The documents produced in conjunction with these supplemental responses are being  
22 produced subject to the confidentiality and attorneys' eyes only protections permitted pursuant to  
23 Section 3(f) of the Stipulation and Order Re: Pending Matters that was entered on May 15, 2020  
24 and pursuant to the terms of Confidentiality and Protective Order that the Parties are currently in  
25 the process of negotiating.

26 Defendants are limiting their responses to the Requests to the reasonable time-frame  
27 of July 1, 2017 to present ("Relevant Period") and object to the Requests to the extent that  
28 Plaintiff fails to limit the Requests to a specific time period.

**SPECIFIC OBJECTIONS TO PLAINTIFF'S DEFINITIONS, INSTRUCTIONS,  
AND RULES OF CONSTRUCTION**

1  
2  
3 1. Defendants object to the "Instructions," "Definitions," and "Rules of  
4 Construction" accompanying the Requests to the extent they purport to impose any obligation  
5 on Defendants different from or greater than those imposed by the Nevada Rules of Civil  
6 Procedure.

7 2. Defendants object to the "Instructions," "Definitions," and "Rules of  
8 Construction" to the extent they purport to require the production of Protected Health  
9 Information or other confidential or proprietary information without confidentiality  
10 protections sufficient to protect such information from disclosure, such as those found in the  
11 Confidentiality and Protective Order entered on June 24, 2020.

12 3. Defendants object to the definition of "Claim" or "Claims" as vague, not  
13 described with reasonable particularity, overbroad, unduly burdensome, not relevant to the  
14 claims or defenses in this case, and not proportional to the needs of this case to the extent  
15 they (1) include claims not specifically identified by Plaintiff in FESM000011, or (2) relate  
16 to claims, patients, or health benefits plans for which Defendants are not responsible for the  
17 at-issue claims administration.

18 4. Defendants object to the definition of "Data iSight" as vague, not described with  
19 reasonable particularity, overbroad, unduly burdensome, not relevant to the claims or defenses  
20 in this case, and not proportional to the needs of this case. Defendants contend that Plaintiff  
21 does not fully or accurately describe Data iSight, which is a service offered by MultiPlan, Inc.  
22 that provides pricing information concerning medical claims.

23 5. Defendants object to the definition of "Document," "Communication," and  
24 "Communicate" to the extent those terms include within their scope materials, at to the  
25 Requests, to the extent they seek documents or information protected by the attorney-client  
26 privilege, the attorney work product doctrine, the settlement privilege, or any other applicable  
27 privilege, including, but not limited to: information that was prepared for, or in anticipation of,  
28 litigation; that contains or reflects the analysis, mental impressions, or work of counsel; that



1 contains or reflects attorney-client communications; or that is otherwise privileged.

2           6. Defendants object to the definition of the terms "Defendants," as used in the  
3 context of the Requests, and "You," and/or "Your" as vague, not described with reasonable  
4 particularity, overbroad, unduly burdensome, not proportional to the needs of the case, and  
5 seeking information that is not relevant to the outcome of any claims or defenses in this  
6 litigation. Plaintiff's definition includes, for example, "predecessors-in-interest," "partners,"  
7 "any past or present agents," and "every person acting or purporting to act, or who has ever  
8 acted or purported to act, on their behalf," which suggests that Plaintiff seeks materials  
9 beyond Defendants' possession, custody, or control. Defendants will not search for or  
10 produce materials beyond their possession, custody, or control. Defendants have answered  
11 the Requests on behalf of Defendants, *as defined herein*, only based upon Defendants'  
12 knowledge, materials and information in Defendants' possession, and belief formed after  
13 reasonable inquiry.

14           7. Defendants object to the definition of "Fremont" as vague, not described with  
15 reasonable particularity, overbroad, unduly burdensome, not proportional to the needs of the  
16 case, and seeking information that is not relevant to the outcome of any claims or defenses  
17 in this litigation Plaintiff's definition includes, for example, "any past or present agents,"  
18 "representatives," "partners," "predecessors-in-interest," "affiliates," and "every person  
19 acting or purporting to act, or who has ever acted or purported to act, on [its] behalf" without  
20 identifying these entities or persons with reasonable particularity, and creating an undue  
21 burden by requiring Defendants to identify them. In responding to the Requests, Defendants  
22 will construe "Fremont" to refer to those parties who were known to have been affiliated  
23 with Fremont Emergency Services (Mandavia), Ltd. during the Relevant Period.

24           8. Defendants object to the definition of "Emergency Services and Care,"  
25 "Emergency Medicine Services," and "Emergency Department Services" as vague, not  
26 described with reasonable particularity, overbroad, unduly burdensome, not relevant to the  
27 claims or defenses in this case, and not proportional to the needs of this case to the extent they  
28 (1) include any medical services not related to the at-issue claims, or (2) relate to any medical

1 services for claims, patients, or health benefits plans for which Defendants are not responsible  
2 for the at-issue claims administration.

3 9. Defendants object to the definition of "Nonemergency Services and Care" as  
4 vague, not described with reasonable particularity, overbroad, unduly burdensome, not  
5 relevant to the claims or defenses in this case, and not proportional to the needs of this case  
6 to the extent it (1) includes services by not related to the at-issue claims, or (2) relates to the  
7 services for claims, patients, or health benefits plans for which Defendants are not  
8 responsible for the at-issue claims administration.

9 10. Defendants object to the definition of "Non-Participating Provider," "Non-  
10 Network Provider," "Participating Provider," and "Network Provider" as vague, not  
11 described with reasonable particularity, overbroad, unduly burdensome, not relevant to the  
12 claims or defenses in this case, and not proportional to the needs of this case to the extent  
13 they (1) include persons or entities that are not parties to this case, or (2) concern persons or  
14 entities unrelated to the at-issue claims.

15 11. Defendants object to the definition of "Plans" and "Plan Members" as vague,  
16 not described with reasonable particularity, overbroad, unduly burdensome, not relevant to  
17 the claims or defenses in this case, and not proportional to the needs of this case to the  
18 extent they (1) include health benefits plans and members of such plans not specifically  
19 identified by Plaintiff, (2) include health benefits plans that are not related to the at-issue  
20 claims, or (3) are referring to health benefits plans for which Defendants are not responsible  
21 for the at-issue claims administration.

22 12. Defendants object to the definition of "Provider" as vague, not described with  
23 reasonable particularity, overbroad, unduly burdensome, not relevant to the claims or defenses  
24 in this case, and not proportional to the needs of this case to the extent it (1) includes persons  
25 or entities that are not parties to this case, or (2) concern persons or entities unrelated to the  
26 at-issue claims.

27 13. Defendants object to Instruction No. 1 as vague and not described with reasonable  
28 particularity, as it uses the term Defendant, in the singular, without defining which of the

Defendants it is referring to. Defendants also object to Instruction No. 1 to the extent it seeks to impose obligations and/or penalties on Defendants beyond what is contemplated by the Nevada Rules of Civil Procedure or applicable local rules.

14. Defendants object to Instruction Nos. 2, 3, 4, 5, 6, 7, and 8 to the extent they seek to impose obligations and/or penalties on Defendants beyond what is contemplated by the Nevada Rules of Civil Procedure.

15. Defendants object to Instruction No. 9 as unduly burdensome and not proportional to the needs of the case insofar as it asks Defendants to provide "[for each document produced, identify the specific document request number or numbers to which the document is responsive." Defendants also object to Instruction No. 9 to the extent it seeks to impose obligations and/or penalties on Defendants beyond what is contemplated by the Nevada Rules of Civil Procedure.

16. Defendants object to Instruction Nos. 10, 11, and 12 to the extent they seek to impose obligations and/or penalties on Defendants beyond what is contemplated by the Nevada Rules of Civil Procedure.

17. Defendants object to Instruction No. 13 as unduly burdensome and not proportional to the needs of the case insofar as it asks Defendants to provide the name of "the person you believe to have possession of the missing documents, and the facts upon which you base your response." Defendants also object to Instruction No. 13 to the extent it seeks to impose obligations and/or penalties on Defendants beyond what is contemplated by the Nevada Rules of Civil Procedure.

## **RESPONSES TO REQUESTS FOR PRODUCTION OF DOCUMENTS**

### **REQUEST FOR PRODUCTION NO. 5:**

Produce any and all Documents and/or Communications relating to Your determination and/or calculation of the allowed amount and reimbursement for any of the CLAIMS, including the following: (i) the method by which the allowed amount and reimbursement for the Claim was calculated; (ii) the total amount You allowed and agreed to pay; (iii) any contractual or other allowance taken; and (iv) the method, date, and final amount of payment.

1 **RESPONSE:**

2 Subject to and without waiving Defendants' objections, including Defendants' specific  
3 objections to Plaintiff's Definitions, Instructions and Rules of Construction, Defendants state as  
4 follows: Defendants object that the term "CLAIM" is vague, as noted in Defendants' objections  
5 to Plaintiff's Definitions, as the definition does not identify what specific list of claims it is  
6 referring to. However, Defendants interpret this Request as referring to the claims listed in  
7 FESM000011. Assuming those are the claims Fremont intended to refer to, Defendants object to  
8 this Request on the basis that it is unduly burdensome and seeks information that is not  
9 proportional to the needs of the case. Fremont has asserted 15,210 CLAIMS where it alleges that  
10 Defendants did not reimburse Fremont for the full amount billed. To produce the documents and  
11 communications related to the four categories set forth in this Request (i.e. (i) the reimbursement  
12 methodology, (ii) the total amount allowed and agreed to pay, (iii) any contractual or other  
13 allowance taken and (iv) the method, date and final amount of payment), Defendants would,  
14 among other things, have to pull the administrative record for each of the 15,210 individual  
15 CLAIMS, review the records for privileged/protected information and then produce them. As  
16 explained more fully in the burden declaration attached as Exhibit 1, this would be unduly  
17 burdensome as Defendants believe it will take 2 hours to pull each individual claim file for a  
18 total of 30,420 hours of employee labor.

19 Defendants further object to categories (ii), (iii) and (iv) of this Request as they seek  
20 information that is equally, if not more accessible, to Fremont. There is no justification for  
21 imposing the burden on Defendants to identify, collect, review, and produce such documents  
22 when Fremont already possesses the same.

23 Moreover, the request is overbroad, unduly burdensome, not reasonably particular, and  
24 not proportional to the needs of the case as it essentially requests all documents related to the  
25 parties' claims and defenses. It would be essentially impossible for Defendants to perform the  
26 investigation necessary to identify all documents and communications that in some way relate to  
27 the determination and calculation of the allowed amounts for all of the 15,210 CLAIMS.

28 Defendants request that Fremont meet and confer to narrow the scope of this request and



1 provide some semblance of reasonable particularity with respect to the type of documents they  
2 are seeking so as to reduce the burden imposed on Defendants.

3 Responding further, subject to and without waiving Defendants' objections: please see  
4 documents previously produced as DEF001536–DEF010454.

5 **Responding further, subject to and without waiving Defendants' objections: please**  
6 **see documents produced as DEF011481–DEF028026. Defendants have made diligent**  
7 **efforts to respond to this Request, but reserve the right to supplement their response and**  
8 **objections.**

9 **REQUEST FOR PRODUCTION NO. 10:**

10 Produce any and all Documents and/or Communications relating to the methodology You  
11 currently use, or used during calendar or Plan years 2016, 2017, 2018 and/or 2019 to determine  
12 and/or calculate Your reimbursement of Non-Participating Providers in Nevada for Emergency  
13 Medicine Services.

14 **RESPONSE:**

15 Subject to and without waiving Defendants' objections, including Defendants' specific  
16 objections to Plaintiff's Definitions, Instructions and Rules of Construction, Defendants state as  
17 follows: Defendants object that this Request is overbroad, unduly burdensome and seeks  
18 information that is not relevant and not proportional to the needs of the case. This Request is  
19 overbroad as it seeks information on methodologies used prior to July 1, 2017 (the date of the  
20 first claim Fremont is asserting). This Request is also overbroad as it seeks information on the  
21 methodologies used to calculate reimbursement rates for all non-participating emergency  
22 services providers in Nevada, as opposed to being limited to information related to  
23 methodologies used to calculate the rate of reimbursement on the claims Fremont is asserting in  
24 this litigation. The information sought in this Request is also not relevant as Defendants often  
25 use different reimbursement methodologies depending on, for example, the particular claim,  
26 provider, and/or the applicable health benefits plan documents.

27 Defendants request that Fremont meet and confer to narrow the scope of this Request to  
28 ensure that it is not unduly burdensome to Defendants and that Fremont is able to get the

1 information it is seeking.

2 Responding further, subject to and without waiving Defendants' objections: please see  
3 documents produced concurrently herewith as DEF011212–DEF011273.

4 **Responding further, subject to and without waiving Defendants' objections: please**  
5 **see documents produced as DEF028027–DEF030189. Defendants have made diligent**  
6 **efforts to respond to this Request, but reserve the right to supplement their response and**  
7 **objections.**

8 **REQUEST FOR PRODUCTION NO. 15:**

9 Produce all Documents and/or Communications, reflecting, analyzing, or discussing the  
10 methodology you used to calculate or determine Non-Participating Provider reimbursement rates  
11 for Emergency Services in Nevada, including, but not limited to, any documents and/or  
12 communications you used or created in the process of calculating and/or determining the  
13 prevailing charges, the reasonable and customary charges, the usual and customary charges, the  
14 average area charges, the reasonable value, and/or the fair market value for Emergency Services  
15 in Clark County.

16 **RESPONSE:**

17 Subject to and without waiving Defendants' objections, including Defendants' specific  
18 objections to Plaintiff's Definitions, Instructions and Rules of Construction, Defendants state as  
19 follows: Defendants object that this Request is overbroad, unduly burdensome and seeks  
20 information that is not relevant and not proportional to the needs of the case since it is not limited  
21 to a specific time frame and/or not limited to the methodology used to calculate reimbursement  
22 rates for emergency services provided by Fremont, as opposed to other non-party emergency  
23 services providers. Rather, this improper Request appears to seek documents and  
24 communications relating to rates of reimbursement to providers other than Fremont.

25 A portion of this Request does seek relevant information as Fremont is a non-  
26 participating provider that provides emergency services in Nevada. However, that portion of this  
27 Request, as currently framed, is unduly burdensome and seeks information that is not  
28 proportional to the needs of the case. Fremont has asserted 15,210 claims where it alleges that

1 Defendants did not reimburse Fremont for the full amount billed. To produce the documents and  
2 communications that relate to the methodology used to calculate the amount of reimbursement  
3 paid on Fremont's claims, Defendants would, among other things, have to pull the administrative  
4 record for each of the 15,210 individual claims, review the records for privileged/protected  
5 information and then produce them. As explained more fully in the burden declaration attached  
6 as Exhibit 1 to, this would be unduly burdensome as Defendants believe it will take 2 hours to  
7 pull each individual claim file for a total of 30,420 hours of employee labor.

8 Responding further, subject to and without waiving Defendants' objections: please see  
9 document produced concurrently herewith as DEF010558.

10 Responding further, subject to and without waiving Defendants' objections: please see  
11 documents produced concurrently herewith as DEF011212–DEF011273.

12 **Responding further, subject to and without waiving Defendants' objections: please**  
13 **see documents produced as DEF028027–DEF030189. Defendants have made diligent**  
14 **efforts to respond to this Request, but reserve the right to supplement their response and**  
15 **objections.**

16 **REQUEST FOR PRODUCTION NO. 23:**

17 Produce any and all Documents and/or Communications relating to any analysis of any  
18 Nevada statutes or guidelines You currently use, or used during calendar or Plan years 2016,  
19 2017, 2018 and/or 2019, to determine and/or calculate Your reimbursement of Non-Participating  
20 Providers in Nevada for Emergency Medicine Services.

21 **RESPONSE:**

22 Subject to and without waiving Defendants' objections, including Defendants' specific  
23 objections to Plaintiff's Definitions, Instructions and Rules of Construction, Defendants state as  
24 follows: Defendants object that this Request is overbroad, unduly burdensome and seeks  
25 information that is not relevant to Plaintiff's claims and not proportional to the needs of the case.  
26 This improper Request seeks documents and communications relating to reimbursement  
27 calculations for all non-participating providers in Nevada rather than just Fremont. Defendants  
28 further object that this Request is vague in referring to "any Nevada statutes or guidelines" rather

1 than to specific statutes. This vagueness, in turn, makes it unduly burdensome for Defendants to  
2 find responsive documents. Further, this Request appears to potentially call for information that  
3 is subject to the attorney-client and/or work product privileges as it is seeking analysis of Nevada  
4 statutes and guidelines. Defendants further object to the extend this Request seeks information  
5 from prior to July 1, 2017, the date of the earliest claim submitted by Fremont, as such  
6 information is not relevant to Plaintiff's claims.

7 To the extent that Fremont intended this Request to refer to NRS 679B.152, Defendants  
8 incorporate by reference their responses to requests for production nos. 1 and 2.

9 Defendants request that Plaintiff meet and confer to narrow the scope of this Request to  
10 ensure that it is not unduly burdensome to Defendants and that Plaintiff is able to get the  
11 information it is seeking.

12 By way of further response, to date, United has not identified any non-privileged  
13 documents responsive to this request. Responding further, United states that, for fully-insured  
14 plans, United typically must file its plan language with the Nevada Division of Insurance and  
15 receive approval for its out-of-network reimbursement methodologies. United is undertaking  
16 efforts to locate documents reflective of these filings.

17 **Responding further, subject to and without waiving Defendants' objections: please**  
18 **see documents produced as DEF028027-DEF030189. Defendants have made diligent**  
19 **efforts to respond to this Request, but reserve the right to supplement their response and**  
20 **objections.**

21 **REQUEST FOR PRODUCTION NO. 24:**

22 Produce any and all Documents and/or Communications relating to any analysis of  
23 Nevada statutes with regard to the payment of the CLAIMS.

24 **RESPONSE:**

25 Subject to and without waiving Defendants' objections, including Defendants' specific  
26 objections to Plaintiff's Definitions, Instructions and Rules of Construction, Defendants state as  
27 follows: Defendants object that the term "CLAIM" is vague, as noted in Defendants' objections  
28 to Plaintiff's Definitions, as the definition does not identify what specific list of claims it is

1 referring to. However, Defendants interpret this Request as referring to the claims listed in  
2 FESM000011. Assuming those are the claims Plaintiff intended to refer to, Defendants object to  
3 this Request on the basis that it is unduly burdensome and seeks information that is not  
4 proportional to the needs of the case. Plaintiff has asserted 15,210 CLAIMS where it alleges that  
5 Defendants did not reimburse Fremont for the full amount billed. To produce the documents and  
6 communications relating to any legal analysis that impacted the amount paid on those CLAIMS  
7 (assuming such documents even exist), Defendants would, among other things, have to pull the  
8 administrative record for each of the 15,210 individual CLAIMS, review the records for  
9 privileged/protected information and then produce them. As explained more fully in the burden  
10 declaration attached as Exhibit 1, this would be unduly burdensome as Defendants believe it will  
11 take 2 hours to pull each individual claim file for a total of 30,420 hours of employee labor.

12 Defendants further object that this Request is vague in referring to “Nevada statutes”  
13 rather than to specific statutes. This vagueness, in turn, makes the Request unduly burdensome  
14 for Defendants to find responsive documents. Further, this Request appears to potentially call  
15 for information that is subject to the attorney-client and/or work product privileges as it is  
16 seeking analysis of Nevada statutes.

17 Defendants request that Plaintiff meet and confer to narrow the scope of this Request to  
18 ensure that it is not unduly burdensome to Defendants and that Plaintiff is able to get the  
19 information it is seeking.

20 By way of further response, to date, United has not identified any non-privileged  
21 documents responsive to this request. Responding further, United states that, for fully-insured  
22 plans, United typically must file its plan language with the Nevada Division of Insurance and  
23 receive approval for its out-of-network reimbursement methodologies. United is undertaking  
24 efforts to locate documents reflective of these filings.

25 **Responding further, subject to and without waiving Defendants’ objections: please**  
26 **see documents produced as DEF028027–DEF030189. Defendants have made diligent**  
27 **efforts to respond to this Request, but reserve the right to supplement their response and**  
28 **objections.**

1 **REQUEST FOR PRODUCTION NO. 45:**

2 Produce any and all Documents and/or Communications supporting, refuting, or relating  
3 to Your affirmative defenses identified in Your Answers to Fremont's First Set of Interrogatories  
4 to Defendants.

5 **RESPONSE:**

6 Subject to and without waiving Defendants' objections, including Defendants' specific  
7 objections to Plaintiff's Definitions, Instructions and Rules of Construction, Defendants state as  
8 follows:

9 Defendants object that this Request is premature as the Defendants are not required to file  
10 an Answer to the Complaint yet and are thus not required to produce documents relating to their  
11 affirmative defenses at this time. Defendants further object that this Request seeks disclosure of  
12 information protected by the attorney work-product doctrine. Defendants will supplement this  
13 response within a reasonable time after filing their Answer to the Complaint.

14 **Responding further, subject to and without waiving Defendants' objections: please**  
15 **see documents produced as DEF028027–DEF030189. Defendants have made diligent**  
16 **efforts to respond to this Request, but reserve the right to supplement their response and**  
17 **objections.**

18 Dated this 3rd day of November, 2020.

19 /s/ Brittany M. Llewellyn  
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