

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA, *et al.*,

Plaintiffs,

v.

UNITEDHEALTH GROUP
INCORPORATED, *et al.*,

Defendants.

Case No. 1:24-cv-03267-JKB

Judge James K. Bredar

**JOINT MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER AND
ORDER GOVERNING PRODUCTION OF INVESTIGATION MATERIALS**

Pursuant to Local Rules 104.13 and 105, the Parties to the above-captioned case, Plaintiffs United States of America and the States of Maryland, Illinois, New Jersey, and New York and Defendants UnitedHealth Group Incorporated and Amedisys, Inc., hereby jointly move for the entry of a Stipulated Protective Order and Order Governing Production of Investigation Materials (the “Order”). To ensure efficient and prompt resolution of this Action, facilitate discovery by the Parties litigating this Action, and protect Confidential Information from improper disclosure or use, the Parties seek entry of the attached proposed Order. Due to the straightforward and joint nature of this motion, the Parties respectfully request that the Court dispense with Local Rule 105’s requirement that all motions be accompanied by a supporting memorandum.

Accordingly, the Parties respectfully request that the Court grant their joint motion for entry of the attached proposed Order.

Dated: November 26, 2024

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 26th day of November, 2024, a copy of the foregoing Joint Motion for Entry of Stipulated Protective Order and Order Governing Production of Investigation Materials was electronically transmitted to the Clerk of Court using the CM/ECF system, which will transmit notification of such filing to all registered participants.

/s/ Erin K. Murdock-Park
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