

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF CONNECTICUT

KIMBERLY A. NEGRON, et al.,

Plaintiffs,

v.

CIGNA HEALTH AND LIFE INSURANCE  
COMPANY and,

Defendant.

Civ. A. No. 16-cv-1702 (JAM)

September 13, 2022

**DEFENDANT CIGNA HEALTH AND LIFE INSURANCE COMPANY'S  
RESPONSE TO THE COURT'S AUGUST 30 MEMORANDUM OF ORDER (ECF 459)**

In response to the Court's August 30, 2022, Memorandum of Order (ECF 459) ("Order") addressing the pending Motions to Seal (ECF 434, 443), Defendant Cigna Health and Life Insurance Company ("CHLIC") provides the following response as permitted by that Order. After reviewing the Court's Order and the underlying materials addressed in the Order, CHLIC does not believe that supplemental briefing is necessary to assist the Court's assessment of those materials, or for the Court to further consider its rulings in the Order. CHLIC also reviewed Plaintiffs' Opposition to Defendant's Motion for Partial Summary Judgment, Plaintiffs' Local Rule 56(a)2 Statement of Facts in Opposition to Summary Judgment, and Defendant's Response to Plaintiffs' Additional Facts in Opposition to Summary Judgment ("Defendant's Response") in light of the Court's Order. CHLIC proposes to seal only one brief reference to a specific, non-party client identified in Defendant's Response. *See* Exhibit A at 14 (attached hereto). Such sealing is necessary to protect the privacy of entities not a party to this litigation and is consistent with this Court's Order sealing similar materials. *See* ECF 459 at 4-5.

Dated: September 13, 2022

Respectfully submitted,

/s/ Brian W. Shaffer

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**CERTIFICATE OF SERVICE**

I hereby certify that on September 13, 2022, the foregoing document was filed electronically. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Brian W. Shaffer  
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