

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE: MULTIPLAN HEALTH
INSURANCE PROVIDER LITIGATION

This Document Relates To:

ALL DIRECT ACTIONS

Case No. 1:24-cv-6795
MDL No. 3121

Hon. Matthew F. Kennelly

DEFENDANTS' JOINT MOTION TO DISMISS
THE CONSOLIDATED MASTER DIRECT ACTION PLAINTIFF COMPLAINT AND
DIRECT ACTION PLAINTIFFS' SHORT-FORM COMPLAINTS

Pursuant to Federal Rule of Civil Procedure 12(b)(6), Defendants MultiPlan, Inc., MultiPlan Corporation, National Care Network, LLC, Viant Payment Systems, Inc., Viant, Inc., Medical Audit & Review Solutions, Inc., Aetna, Inc., Allied National, LLC, Benefit Plan Administrators of Eau Claire, LLC, Blue Cross and Blue Shield of Massachusetts, Inc., Blue Shield of California Life & Health Insurance Company, CareFirst, Inc., Central States Southeast and Southwest Areas Health and Welfare Fund, Aware Integrated, Inc., BCBSM, Inc. (Blue Cross and Blue Shield of Minnesota), Consociate, Inc. (Consociate Health), The Cigna Group, Elevance Health, Inc., Health Care Service Corporation, Highmark Health, Horizon Healthcare Services, Inc. (Horizon Blue Cross and Blue Shield of New Jersey), UnitedHealth Group Inc., Kaiser Foundation Health Plan, Inc., Secure Health Plans of Georgia, LLC, Molina Healthcare, Inc., and Sanford Health Plan (collectively "Defendants") hereby move this Court to dismiss the Consolidated Master Direct Action Plaintiff Complaint and the Direct Action Plaintiffs' Short Form Complaints with prejudice. In support of this Motion, Defendants concurrently submit a Memorandum of Law in Support and the Declaration of Sadik Huseny with attached exhibits.

Dated: January 16, 2025

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I, Sadik Huseny, hereby certify that on this 16th day of January, 2025, I caused the foregoing to be electronically filed with the Clerk of the Court of the United States District Court for the Northern District of Illinois, Eastern Division, using the CM/ECF system, which sent notification of such filing to all filing users.

/s/ Sadik Huseny
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