

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
WASHINGTON

Caryn Jennings et al. v. USAA Casualty Insurance Company et al.

Jennings · No. 3:23-cv-06171-DGE · Decided January 30, 2026

SUMMARY

The United States District Court for the Western District of Washington grants seven motions to seal materials in a class action concerning USAA’s handling of personal injury protection and medical payments claims. The Court finds compelling reasons to seal or redact trade secrets, proprietary claims-processing information, contractual and pricing information, and plaintiffs’ medical and personally identifying information.

OPINION

Jennings

PER CURIAM.

1 2 3 4 5 6 7

UNITED STATES DISTRICT COURT

8

WESTERN DISTRICT OF WASHINGTON

AT TACOMA

9 10 CARYN JENNINGS et al., CASE NO. 3:23-cv-06171-DGE 11 Plaintiffs, ORDER ON
MOTIONS TO SEAL

12 v. (DKT. NOS. 99, 103, 104, 109, 120,
124, 131)

13 USAA CASUALTY INSURANCE

COMPANY et al., 14 Defendants. 15 16 Before the Court are several motions to file various
documents under seal pursuant to 17 Local Civil Rule 5(g). (Dkt. Nos. 99, 103, 104, 109, 120,
124, 131.) 18

I. FACTUAL AND PROCEDURAL BACKGROUND

19 On November 16, 2023, Plaintiffs Caryn Jennings and Tricia Harder filed a class action 20
complaint in the Clark County Superior Court alleging Defendants USAA Casualty Insurance 21
Company and USAA General Indemnity Company (collectively “USAA”) engaged in an 22
improper scheme to deny first party personal injury protection (“PIP”) and/or medical payments
23 (“MedPay”) owed to them under their USAA insurance policies. (Dkt. No. 1-1.) Plaintiffs 24 1
allege that instead of conducting an investigation into each bill for medical expenses submitted, 2
USAA improperly delegated its insurance claims adjustment duties to the computer program of a

3 third party, Auto Injury Solutions (“AIS”), that arbitrarily reduced or denied PIP and/or MedPay
4 claims. (Id. at 2.) Plaintiffs contend USAA uses AIS’s Medical Bill Audit (“MBA”) process to 5
improperly reduce and or/deny claims. (Id.) Plaintiffs argue the MBA process is largely 6
automated and is designed to systematically deny or reduce the amount USAA pays for health 7
care expenses based upon its treatment of various codes. (Id. at 2–5.) 8 On May 31, 2024, the
Court entered a stipulated protective order (Dkt. No. 40) and a 9 stipulated agreement (Dkt. No.
41) regarding discovery of electronically stored information. On
10 August 4, 2025, Plaintiffs filed a motion for leave to file under seal unredacted versions of their
11 motion for class certification and certain exhibits and expert reports. (Dkt. No. 86.) On
12 September 11, 2025, the Court denied Plaintiffs’ motion and granted Defendants leave to file a
13 new motion to seal identifying in detail the basis for sealing/redactions no later than October
11, 14 2025. (Dkt. No. 98.) 15 On October 10, 2025, Defendants filed a motion to keep under seal
the entirety of 11 16 documents, as well as unredacted versions of 16 documents or transcripts,
filed by Plaintiffs as 17 exhibits to their Motion for Class Certification. (Dkt. No. 99.) The same
day, non-party CCC 18 Intelligent Solutions Inc. (“CCC”)1 filed a motion to seal certain
confidential information 19 contained in briefs and exhibits filed by the parties in this case. (Dkt.
No. 103.) Plaintiffs also 20 filed a motion to maintain under seal unredacted versions of certain
exhibits submitted in support 21 of their motion for class certification. (Dkt. No. 104.) On October
23, 2025, Defendants filed a 22 23 1 CCC is the successor entity to AIS. (Dkt. No. 105 at 4.) 24 1
motion for leave to seal an unredacted version of their motion for summary judgment, along with
2 unredacted versions of certain exhibits. (Dkt. No. 109.) 3 On December 4, 2025, Defendants
filed a motion for leave to seal unredacted versions of 4 Defendants’ publicly filed and redacted
exhibits to Defendants’ motion to strike Plaintiffs’ expert 5 reports. (Dkt. No. 120.) On December
8, 2025, Defendants filed a motion to seal an unredacted 6 version of Defendants’ opposition to
Plaintiffs’ motion for class certification, along with 7 unredacted versions of certain exhibits. (Dkt.
No. 124.) On December 15, 2025, Plaintiffs filed 8 a motion to seal unredacted versions of their
opposition to Defendant’s motion for summary 9 judgment along with certain exhibits. (Dkt. No.
131.)

10 II. LEGAL STANDARD

11 “There is a strong presumption of public access to the court’s files.” Local Civil Rule 12 5(g).
“Historically, courts have recognized a general right to inspect and copy public records and 13
documents, including judicial records and documents.” See *Kamakana v. City and Cnty. of 14*
Honolulu, 447 F.3d 1172, 1178 (9th Cir. 2006) (internal quotations omitted). Although “access 15
to judicial records is not absolute,” there is a “strong presumption in favor of access.” Id. “The 16
presumption of access is based on the need for federal courts, although independent—indeed, 17
particularly because they are independent—to have a measure of accountability and for the 18
public to have confidence in the administration of justice.” *Ctr. for Auto Safety v. Chrysler Grp.,*
19 LLC, 809 F.3d 1092, 1096 (9th Cir. 2016) (internal quotations omitted). 20 Accordingly, “a

party seeking to seal a judicial record then bears the burden of overcoming this strong presumption by meeting the ‘compelling reasons’ standard.” *Id.* (citing *Foltz v. State Farm Mut. Auto. Ins. Co.*, 331 F.3d 1122, 1135 (9th Cir. 2003)). Under the compelling reasons standard, “a court may seal records only when it finds ‘a compelling reason and articulate[s] the factual basis for its ruling, without relying on hypothesis or conjecture.’” *Ctr. for Auto Safety*, 809 F.3d at 1096–1097 (quoting *Kamakana*, 447 F.3d at 1179). “What constitutes ‘compelling reason’ is ‘best left to the sound discretion of the trial court.’” *Id.* at 1097 (quoting *Nixon v. Warner Commc’ns, Inc.*, 435 U.S. 589, 599 (1978)). A motion to seal a document must include a specific statement of the applicable legal standard and the reasons for keeping a document under seal, including an explanation of: (1) the legitimate private or public interests that warrant the relief sought; (2) the injury that will result if the relief sought is not granted; and (3) why a less restrictive alternative to the relief sought is not sufficient. Local Civil Rule 5(g)(3)(B).²

III. DISCUSSION

A. Defendants’ Motion to Seal (Dkt. No. 99) Defendants argue their MBA process is unique, provides them a competitive advantage, and is a sensitive trade secret developed at significant expense. (Dkt. No. 99 at 3–4.) Defendants assert they have instituted extensive security precautions to ensure information related to this process and associated policies, procedures, guidelines and training are kept confidential. (*Id.* at 4–5.) Defendants contend they seek to seal only those documents or selected portions of documents that reveal their trade secrets or other sensitive proprietary information. (*Id.* at 6–7.) Exhibit 6 to the Declaration of Cecily Jordan and Exhibit 34 to the Dave Jones Expert Report Pursuant to Local Civil Rule 5(g)(3)(A), a motion to seal must include a certification that the party has met and conferred with all other parties in an attempt to reach agreement on the need to file the document under seal. Six of the motions included the required certification. (Dkt. Nos. 103, 104, 109, 120, 124, 131.) Defendants’ motion did not. (Dkt. No. 99.) However, because the documents Defendants and CCC seek to seal are substantially identical, and since the parties met and conferred with respect to CCC’s motion, the Court finds any omission on Defendants’ part to be harmless. Defendants seek to seal a document referred to as the “Taxonomy” and a single paragraph on page 38 of the expert report of Dave Jones which quotes from the Taxonomy. (Dkt. Nos. 90-6; 91-35; 99 at 7; 99-3 at 39.) Defendants state the Taxonomy was created by CCC and contains a list of business rules available for USAA to implement in its MBA process. (Dkt. No. 99 at 7.) Defendants assert the Taxonomy describes the entire MBA process USAA has designed and implemented with CCC, and would, if revealed, act as a “playbook” for USAA’s competitors to create and implement similar processes. (*Id.* at 7–8.) The Ninth Circuit has recognized that “‘compelling reasons’ . . . exist when [] ‘court files might have become a vehicle for improper purposes,’ such as the use of records to gratify private spite, promote public scandal, circulate libelous statements, or release trade secrets.” *Kamakana*, 447 F.3d at 1179 (quoting *Nixon*, 435 U.S. at

598). Courts in this circuit have found compelling 12 reasons for sealing documents that contain information about a party's internal operations that 13 could harm its competitive standing if revealed. See, e.g., *In re Apple Inc. Device Performance 14 Litig.*, Case No. 5:18-MD-02827-EJD, 2019 WL 1767158, at *2 (N.D. Cal. Apr. 22, 2019) 15 ("Courts applying the compelling reasons standard have upheld the sealing of trade secrets, 16 marketing strategies, product development plans, detailed product-specific financial information, 17 customer information, internal reports and other such materials that could harm a party's 18 competitive standing"); *Transperfect Glob., Inc. v. Motionpoint Corp.*, Case No. C 10- 2590 19 CW, 2013 WL 209678, at *1 (N.D. Cal. Jan. 17, 2013) (granting motion to seal exhibits that 20 contained proprietary information about the sealing party's internal business operations). 21 Here, the Court finds compelling reasons exist to maintain under seal information related 22 to the Taxonomy given the potential harm revealing information about USAA's internal process 23 for evaluating claims would have with respect to USAA's competitive standing. 24 1 2. Exhibit 7 to the Dave Jones Expert Report 2 Defendants seek to redact several pages from the Rule 30(b)(6) deposition testimony of 3 Caleb Bailey, a Lead Business Process Owner for USAA. (Dkt. Nos. 91-8; 99 at 8-9.) 4 Defendants contend Bailey's testimony concerned the individual rules that dictate how the MBA 5 system processes specific bills. (Id. at 8.) Defendants argue publicly revealing this information 6 would make it easier for individuals to defraud USAA and those it insures by circumventing 7 measures USAA has put into place to avoid paying fraudulent or duplicate charges. (Id.) For the 8 reasons discussed above, the Court finds compelling reasons to redact testimony concerning the 9 details of USAA's claims processing system. See *supra* Section III.A.1. 10 3. Exhibits 3 and 26 to the Dave Jones Expert Report 11 Defendants seek to seal, in their entirety, the Master Services Agreement ("MSA") 12 between USAA and AIS and the Amended and Restated Project Addendum for MBA Services. 13 (Dkt. Nos. 90-3; 91-27; 99 at 9-12.) 14 Defendants assert USAA has contracted with CCC/AIS to provide services in support of 15 USAA's MBA process for MedPay claims, and argue the MSA sets out in detail "processes, 16 methods, and systems that are essential to the overall MBA program[.]" (Id. at 9-10.) 17 Defendants contend the MSA covers "in minute detail" important aspects of the MBA process 18 and a wide variety of topics concerning the USAA-AIS relationship, including information 19 security requirements critical for discouraging hackers and protecting USAA members' 20 "confidential and protected personal information and personal health information, software 21 licensing provisions, other technical requirements, dispute resolution procedures, termination 22 provisions and procedures, indemnification provisions, and insurance requirements." (Id. at 10- 23 11.) 24 1 Courts in this circuit have found compelling reasons for sealing documents that contain 2 similar business and financial agreements. *In re Apple Inc. Device Performance Litig.*, 2019 WL 3 1767158, at *2; *Nautilus Biotechnology, Inc. v. SomaLogic, Inc.*, Case No. 23-CV-06440-BLF, 4 2024 WL 4894852, at *2 (N.D. Cal. Nov. 26, 2024) (finding compelling reasons to seal a 5 document that contained "confidential business information regarding Defendants' license 6 agreements.").

Courts in this circuit have also found compelling reasons to seal documents that might compromise information security. *Music Grp. Macao Com. Offshore Ltd. v. Foote*, Case No. 14-cv-03078-JSC, 2015 WL 3993147, at *6 (N.D. Cal. June 30, 2015) (“[T]he Court finds a compelling reason to seal the portions of this exhibit that discuss Plaintiff’s network infrastructure and security systems.”) Here, Defendants have established compelling reasons to seal the MSA and the Addendum, which contain potential trade secrets and information that might compromise the parties’ information security. 4. Exhibits 3 and 13 to the Declaration of Cecily Jordan, Exhibits 9, 10, 25, 27, 28 to the Dave Jones Expert Report, and Exhibits 6, 19, 20, 21 to the Zachary Warzel Expert Report Defendants seek to redact portions of these exhibits, which contain: 1) excerpts of the MSA; 2) the 2022 Amended and Restated Project Addendum for MBA Services; 3) detailed summaries of the contractual terms in the MSA; and 4) deposition transcripts in which the witnesses discuss specific contractual terms in the MSA. (Dkt. Nos. 90-3; 90-12; 91-10; 91-11; 91-26; 91-28; 92-7; 92-20; 92-21; 92-22; 99 at 12–13.) Defendants argue these documents reflect financial, pricing and other contractual terms of the MSA, as well as project addenda to the MSA and are sensitive for the same reasons as the MSA and Project Addendum. (Dkt. No. 22 99 at 13.) 1 The Court finds compelling reasons to seal excerpts of the MSA and the Addendum for the reasons stated above. The Court also finds compelling reasons to seal these documents to the extent they contain sensitive financial and pricing information. *Virun, Inc. v. Cymbiotika, LLC*, Case No. 8:22-cv-00325-SSS-DFMx, 2022 WL 17401698, at *2 (C.D. Cal. Aug. 19, 2022) (collecting cases and noting courts in this circuit “have found potential harms arising from public disclosure of trade secrets of a business’ confidential financial and pricing information to be sufficient reason to seal”); *Quidel Corp. v. Siemens Med. Solutions USA, Inc.*, Case No. 16-cv- 8 3059-BAS-AGS, 2020 WL 1062949, at *2 (S.D. Cal. Mar. 4, 2020) (finding compelling reasons to seal “confidential financial and pricing information”). 5. Exhibit 20 to the Declaration of Cecily Jordan, Exhibit 29 to Dave Jones Expert Report, and Exhibit 22 to the Zachary Warzel Report Defendants seek to seal these exhibits, which contain: 1) the detailed pricing structure negotiated by USAA and CCC/AIS in the MSA; and 2) the specific pricing of services provided by CCC/AIS to USAA, along with payment history. (Dkt. Nos. 91-30; 92-23; 99 at 14–15.) 14 Defendants argue disclosure of these pricing terms would harm their competitive advantage in the insurance industry by disclosing information competitors could use to negotiate more favorable terms with CCC/AIS and/or other vendors to USAA’s competitive disadvantage. (Id. 17 at 14.) For the reasons discussed above, the Court finds compelling reasons to seal these exhibits, which contain confidential pricing information. See *supra* Section III.A.4. 19

6. Exhibits 10, 23, and 26 to Zachary Warzel Expert Report

20 Defendants assert these exhibits contain information concerning USAA’s “Knowledge Delivery” system, a “playbook” which outlines USAA’s MBA process and is used to train 22 employees. (Dkt. Nos. 92-11; 92-24; 92-27; 99 at 15–17.) Defendants contend their Knowledge 23

24 1 Delivery System was developed at significant expense and provides them with a competitive
2 advantage. (Dkt. No. 99 at 15.) 3 As discussed above, the Court finds there are compelling
reasons to seal information 4 concerning the MBA process. See *supra* Section III.A.1. The Court
further finds compelling 5 reasons to seal these exhibits to the extent they contain information
used to train USAA 6 employees. See, e.g., *HSBC Bank USA, Nat’l Ass’n v. Chi. Title Ins. Co.*,
Case No. 2:18-cv- 7 02162-MMD-DJA, 2023 WL 6723619, at *2 (D. Nev. Oct. 11, 2023) (finding
compelling 8 reasons to seal an insurance claims handbook which included “guidance on how to
handle claims 9 properly and efficiently,” because “the more prepared claims adjusters are to
handle claims 10 effects how successful a title insurance company is”). 11 7. Exhibits 38 and 40 to
Dave Jones Expert Report 12 Defendants seek to redact portions of PowerPoint slides that contain
information 13 regarding USAA’s redesigned First Party Injury experience. (Dkt. Nos. 91-39; 91-
41; 99 at 17.) 14 Defendants assert these slides contain details concerning the new customer
experience, an 15 explanation of why the process was changed, and details about the specific
changes to be 16 implemented. (Dkt. No. 99 at 17.) Defendants argue these slides contain
sensitive business 17 plans and strategies that could be used by competitors “to erode USAA’s
competitive advantages 18 in efficiency, customer satisfaction, and cost management.” (Id.) The
Court agrees, and finds 19 compelling reasons to redact the relevant information. In *re Apple Inc.*,
2019 WL 1767158 at *2. 20 8. Exhibit 25 to Zachary Warzel Expert Report 21 Defendants seek to
seal a training slide deck provided to USAA adjusters to refresh their 22 training on USAA’s First
Party Claims Process. (Dkt. Nos. 92-26; 99 at 18–19.) For the reasons 23 24 1 discussed above,
the Court finds compelling reasons to seal this exhibit. See *supra* Section 2 III.A.6. 3 B. CCC’s
Motion to Seal (Dkt. No. 103) 4 1. The Taxonomy 5 Non-party CCC seeks to maintain under seal
certain excerpts of the “Taxonomy”, the 6 same document identified in Defendants’ motion to
seal. (Dkt. Nos. 90-6; 91-35; 103 at 5–7.) 7 For the reasons identified above, the Court finds
compelling reasons to maintain these documents 8 under seal. See *supra* Section III.A.1. 9 2. The
MSA 10 CCC also seeks to seal the full MSA between CCC and Defendants. (Dkt. No. 103 at 7–
11 9.) For the reasons identified above, the Court finds compelling reasons to maintain these 12
documents under seal. See *supra* Section III.A.3. 13 3. The MBA Project Addenda 14 CCC seeks
to redact portions of excerpts MBA Project Addenda. (Dkt. No. 103 at 9–10.) 15 For the reasons
identified above, the Court finds compelling reasons to maintain these documents 16 under seal.
See *supra* Sections III.A.3 and III.A.4. 17 4. Additional Exhibits 18 CCC moves to seal a training
document for CCC’s MBA process and an executive 19 contract summary of the MSA between
USAA and CCC’s predecessor, AIS. (Dkt. No. 103 at 20 10–11.) For the reasons identified above,
the Court finds compelling reasons to maintain these 21 documents under seal. See *supra* Sections
III.A.4 and III.A.6. 22 5. Expert Reports and Briefs 23 CCC seeks parallel redactions to the Jones
and Warzel reports be made because they 24 1 relate to other materials that CCC seeks to seal or
redact. (Dkt. No. 103 at 11–12.) CCC 2 attaches proposed redacted versions of these reports to its
declaration. (Dkt. Nos. 105-12; 105- 3 13.) For the reasons identified above, the Court finds

compelling reasons to redact these 4 documents in the manner requested by CCC. 5 C. Plaintiffs' Motion to Seal (Dkt. No. 104) 6 Plaintiffs seek to seal unredacted versions of certain exhibits that contain Plaintiffs' 7 personally identifiable information, medical information, and descriptions of medical services 8 and diagnoses. (Dkt. Nos. 90-1; 90-7; 90-11; 90-14; 90-153; 104.) Courts in the Ninth Circuit 9 have recognized "the need to protect medical privacy" qualifies as a compelling reason for 10 sealing records because a person's medical records "contain sensitive and private information 11 about their health." *Aguilar v. Koehn*, Case No. 3:16-CV-0529-MMD-CBC, 2018 WL 4839021, 12 at *2 (D. Nev. Oct. 4, 2018) (collecting cases). Courts have similarly found compelling reasons 13 to seal personally identifying information, such as names, addresses, phone numbers, and email 14 addresses. *UnifySCC v. Cody*, Case No. 5:22-cv-01019-BLF, 2024 WL 4752092 at *2 (N.D. 15 Cal. Oct. 24, 2024) (collecting cases). The Court has reviewed the exhibits cited by Plaintiffs, 16 which do appear to contain sensitive personal and medical information. The Court therefore 17 finds compelling reasons to maintain these documents under seal. 18 D. Defendants' Motion to Seal Unredacted Motion for Summary Judgment and Exhibits (Dkt. No. 109) 19 Defendants move to file under seal an unredacted version of their motion for summary 20 judgement along with various exhibits attached to the motion and to the declaration of Caleb 21 22 3 This exhibit, cited in Plaintiffs' motion, appears to be an excerpt of a deposition of Kristina 23 Newman. The correct exhibit appears to located at Dkt. No. 90-13, and the Court will grant Plaintiffs' motion as to this exhibit. 24 1 Bailey. (Dkt. No. 109.) Defendants seek to file unredacted versions of these documents under 2 seal because the redacted excerpts contain: 1) Plaintiffs' medical and personal identifying 3 information, and 2) Plaintiffs' USAA member numbers. (Id. at 2–7.) While Defendants have 4 not yet filed unredacted versions of these documents for the Court's review, the redacted sections 5 appear to contain sensitive personal and medical information. For the reasons identified above, 6 the Court finds compelling reasons to maintain these documents under seal. See supra Section 7 C. 8 E. Defendants' Motion to Seal Unredacted Exhibits to Defendants' Motion to Strike Expert Reports (Dkt. No. 120) 9 Defendants seek to file under seal materials designated as confidential pursuant to the 10 protective order entered in this case along with unredacted versions of redline comparisons 11 between Plaintiffs' expert reports filed in this case and another case filed in South Carolina, both 12 of which quote from "proprietary, commercially sensitive business information[.]" (Dkt. No. 13 120 at 1–2.) Defendants contend the information they seek to seal in the redline comparisons is 14 the same information Defendants sought to seal in the expert reports of Dave Jones and Zachary 15 Warzel, specifically excerpts of the Taxonomy and terms of the MSA. (Dkt. Nos. 99; 120 at 6– 16 7.) Defendants also seek to seal Plaintiffs' medical and personal identifying information. (Id. at 17 5.) For the reasons identified above, the Court finds compelling reasons to maintain these 18 documents under seal. See supra Sections A and C. 19 F. Defendants' Motion to Seal Unredacted Opposition to Plaintiffs' Motion for 20 Class Certification and Exhibits (Dkt. No. 124) 21 Defendants further seek to maintain under seal an unredacted version of Defendants' 22 publicly

filed and unredacted Opposition to Class Certification, along with unredacted versions 23 of exhibits containing Plaintiffs' medical and personal identifying information. (Dkt. No. 124 at 24 1 2–4.) For the reasons discussed above, the Court finds compelling reasons to maintain these 2 documents under seal. 3 G. Plaintiffs' Motion to Seal (Dkt. No. 131) 4 Plaintiffs move for leave to seal unredacted versions of their opposition to Defendants' 5 motion for summary judgment together with certain exhibits filed in support of that opposition. 6 (Dkt. No. 131.) Plaintiffs argue the materials they seek to seal are subject to a pending motion to 7 seal (Dkt. No. 99) contain confidential medical information, personally identifying information, 8 and other sensitive non-public material regarding Plaintiffs. For the reasons discussed above, the 9 Court finds compelling reasons to maintain this information under seal.

10 IV. ORDER

11 The Court hereby orders that: 12 1) Defendants' motion to seal (Dkt. No. 99) is GRANTED. 13 2) CCC's motion to seal (Dkt. No. 103) is GRANTED. 14 3) Plaintiffs' motion to seal (Dkt. No. 104) is GRANTED. 15 4) Defendants' motion to seal (Dkt. No. 109) is GRANTED. 16 5) Defendants' motion to seal (Dkt. No. 120) is GRANTED. 17 6) Defendants' motion to seal (Dkt. No. 124) is GRANTED. 18 7) Plaintiffs' motion to seal (Dkt. No. 131) is GRANTED. 19 \ 20 \ 21 \ 22 \ 23 \ 24 1 The following table summarizes which documents shall remain under seal and their 2 corresponding redacted versions: 3 Unredacted Version Redacted Version Document under seal filed at: filed at: 4 The Taxonomy and a single paragraph Dkt. Nos. 90-6; 91-35 N/A – Entire on page 38 of the expert report of Dave Document Sealed 5 Jones which quotes from the Taxonomy

6 Exhibit 7 to the Dave Jones Report - Dkt. No. 91-7 Dkt. No. 99-3

Rule 30(b)(6) deposition testimony of 7 Caleb Bailey Exhibits 3 and 26 to the Dave Jones Dkt. Nos. 90-3; 91-27 Dkt. Nos. 105-4; 105- 8 Expert Report - Master Services 5; 105-6; 105-7 – Agreement and Amended and Restated Exhibits 4, 5, 6, 7 9 Project Addendum for MBA Services Exhibits 3 and 13 to the Declaration of Dkt. Nos. 90-3; 90-12; 91- N/A – Redacted 10 Cecily Jordan, Exhibits 9, 10, 25, 27, 10; 91-11; 91-26; 91-28; Versions Not Yet Filed 28 to the Dave Jones Expert Report, 92-7; 92-20; 92-21; 92-22 11 and Exhibits 6, 19, 20, 21 to the Zachary Warzel Expert Report

12 Exhibit 20 to the Declaration of Cecily Dkt. Nos. 91-30; 92-23 N/A – Entire Jordan, Exhibit 29 to Dave Jones Document Sealed 13 Expert Report, and Exhibit 22 to the Zachary Warzel Report

14 Exhibits 10, 23, and 26 to Zachary Dkt. Nos. 92-11; 92-24; N/A – Entire Warzel Expert Report 92-27 Document Sealed

15 Exhibits 38 and 40 to Dave Jones Dkt. Nos. 91-39; 91-41 N/A – Redacted Expert Report Versions Not Yet Filed

16 Exhibit 25 to Zachary Warzel Expert Dkt. No. 92-26 N/A – Entire Report Document Sealed 17 Training document for CCC's MBA Dkt. Nos. 90-5; 92-12; 92- Dkt.

Nos. 105-7; 105- process and executive contract 22 9; 105-10; 105-21 18 summaries Dave Jones Expert Report N/A – Unredacted Dkt. No. 105-12 19 Version Not Yet Filed Zachary Warzel Expert Report N/A – Unredacted Dkt. No. 105-13 20 Version Not Yet Filed Personally identifiable information, N/A – Unredacted Dkt. Nos. 90-1; 90-7; 21 medical information, and descriptions Versions Not Yet Filed 90-11; 90-13; 90-14 of medical services and diagnoses 22 Motion for Summary Judgment and N/A – Unredacted Dkt. Nos. 110; 111 Related Exhibits Versions Not Yet Filed 23 Opposition to Class Certification N/A – Unredacted Dkt. No. 122 Versions Not Yet Filed 24 1 Opposition to Defendants’ Motion for Dkt. No. 134 N/A – Redacted Summary Judgment Version Not Yet Filed 2 3 Each document identified in the table above should have an unredacted version filed 4 under seal and a redacted version filed, unless the entire document was allowed to be filed under 5 seal. Accordingly, the Parties shall file under seal within 10 days of the entry of this order all 6 unredacted documents and redacted versions identified as missing in the table above. 7 Dated this 30th day of January, 2026. 8 A 9 David G. Estudillo 10 United States District Judge 11 12 13 14 15 16 17 18 19 20 21 22 23 24