UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA, et al., *Plaintiffs*, v. UNITEDHEALTH GROUP INCORPORATED, and AMEDISYS, INC., *Defendants*.	Case No. 1:24-cv-03267-JKB Judge James K. Bredar

PLAINTIFFS' UNOPPOSED MOTION TO STAY THE ACTION AND EXPLANATION OF PROCEDURES UNDER THE ANTITRUST PROCEDURES AND PENALTIES ACT

Plaintiff United States of America, the Plaintiff States of Maryland, Illinois, New Jersey, and New York (collectively, the "Plaintiff States"), and Defendants UnitedHealth Group Incorporated and Amedisys, Inc. (collectively, "Defendants"), have reached a settlement of this case that is embodied in a proposed Final Judgment. The proposed Final Judgment and a proposed Asset Preservation and Hold Separate Stipulation and Order ("Stipulation and Order"), were filed at the same time as this Unopposed Motion and Explanation and attached hereto. As such, Plaintiffs submit this Explanation summarizing the procedures of the Antitrust Procedures and Penalties Act, 15 U.S.C. §§ 16(b)–(h) (the "APPA" or "Tunney Act") and move this Court to (a) enter the Stipulation and Order, and (b) stay the case during the process required by the Tunney Act.

1. The United States has filed the proposed Final Judgment and Stipulation and Order, to which the United States, Plaintiff States, and Defendants have agreed, and the United States will file a Competitive Impact Statement explaining the proposed settlement. The United States, Plaintiff States, and Defendants have also agreed that the Court may enter the proposed Final Judgment after the requirements of the Tunney Act have been satisfied.

2. The United States, Plaintiff States, and Defendants ask that the Court sign the Stipulation and Order as soon as possible. The Stipulation and Order will ensure that Defendants preserve competition during the Tunney Act proceedings by (a) complying with the provisions of the proposed Final Judgment, and (b) maintaining the assets that the proposed Final Judgment requires Defendants to divest.

3. The Court should not sign the proposed Final Judgment until the requirements of the Tunney Act are satisfied. The Tunney Act requires that the United States (a) publish the proposed Final Judgment and the Competitive Impact Statement in the *Federal Register* and (b) cause a summary of the terms of the proposed Final Judgment and the Competitive Impact Statement to be published in one or more newspapers at least 60 days before the Court signs the proposed Final Judgment. The newspaper notice(s) will inform the public how to submit comments about the proposed Final Judgment to the United States Department of Justice's Antitrust Division. Defendants have agreed to arrange and pay for the required newspaper notice(s).

4. Members of the public who wish to submit comments will be invited to do so within 60 days following publication in the *Federal Register* and of the newspaper notice(s). The United States will prepare a response to any comments received during this period and will (a) file with the Court the comments and the United States' response and (b) publish the

comments and the United States' response in the *Federal Register* unless this Court authorizes an alternative method of public dissemination of the public comments and the response to those comments pursuant to the Tunney Act, 15 U.S.C. § 16(d). After the comments and the United States' response have been filed with the Court and published, the United States may move the Court to enter the proposed Final Judgment unless the United States has withdrawn its consent to entry of the Final Judgment, as permitted by Paragraph V.A of the Stipulation and Order.

5. If the United States moves the Court to enter the proposed Final Judgment after compliance with the Tunney Act, the Court may enter the Final Judgment without a hearing if the Court concludes that the Final Judgment is in the public interest.

Dated: August 7, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on August 7, 2025, a copy of the foregoing PLAINTIFFS' UNOPPOSED MOTION TO STAY THE ACTION AND EXPLANATION OF PROCEDURES UNDER THE ANTITRUST PROCEDURES AND PENALTIES ACT was electronically transmitted to the Clerk of the Court using the CM/ECF system, which will transmit notification of such filing to all registered participants.

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