

**UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT**

KIMBERLY A. NEGRON, et al.

Plaintiffs,

v.

CIGNA HEALTH AND LIFE INSURANCE
COMPANY, et al.

Defendants.

Civil No. 3:16-cv-1702 (JAM)

Oral Argument Requested

**DEFENDANT CIGNA HEALTH AND LIFE INSURANCE COMPANY'S
MOTION FOR PARTIAL SUMMARY JUDGMENT**

Defendant Cigna Health and Life Insurance Company, by and through its undersigned counsel, hereby moves this Court for an order granting partial summary judgment on both of Plaintiffs' claims under the Racketeer Influenced and Corrupt Organizations Act, as alleged in Counts VII and VIII of the Second Amended Consolidated Complaint, pursuant to Rule 56 of the Federal Rules of Civil Procedure and Local Rule 56.

Dated: March 18, 2022

Respectfully submitted,

/s/ Brian W. Shaffer

Brian W. Shaffer (phv08654)

Jeremy P. Blumenfeld (phv23943)

Matthew D. Klayman (phv08656)

MORGAN, LEWIS & BOCKIUS LLP

1701 Market Street

Philadelphia, PA 19103

Telephone: +1.215.963.5000

Facsimile: +1.215.963.5001

brian.shaffer@morganlewis.com

jeremy.blumenfeld@morganlewis.com

matthew.klayman@morganlewis.com

Lisa R. Weddle (phv08957)
MORGAN, LEWIS & BOCKIUS LLP
300 South Grand Avenue
Twenty-Second Floor
Los Angeles, CA 90071-3132
Telephone: +1.213.612.2500
Facsimile: +1.213.612.2501
lisa.weddle@morganlewis.com

Michael D. Blanchard (ct25891)
MORGAN, LEWIS & BOCKIUS LLP
One State Street
Hartford, CT 06103
Telephone: +1.860.240.2945
Facsimile: +1.860.240.2800
michael.blanchard@morganlewis.com

*Attorneys for Defendant Cigna Health and Life
Insurance Company*

CERTIFICATE OF SERVICE

I hereby certify that on March 18, 2022, the foregoing was filed with the Clerk of the Court using the CM/ECF system and served upon all counsel of record.

/s/ Brian Shaffer
Brian W. Shaffer