

**IN THE UNITED STATES COURT OF FEDERAL CLAIMS**

COMMON GROUND HEALTHCARE  
COOPERATIVE,

Plaintiff,  
on behalf of itself and all  
others similarly situated,

vs.

THE UNITED STATES OF AMERICA,

Defendant.

No. 1:17-cv-00877-MMS  
(Judge Sweeney)

**PLAINTIFF COMMON GROUND HEALTHCARE COOPERATIVE'S SECOND  
UNOPPOSED MOTION TO INCLUDE ADDITIONAL CLASS MEMBERS**

Pursuant to Rule 23(c) of this Court's Rules ("RCFC"), Plaintiff Common Ground Healthcare Cooperative ("CGHC" or "Plaintiff") respectfully requests that the Court grant this motion to include four additional QHP Issuers in the CSR Class and/or the 2016 Risk Corridors Class. The list of additional class members is as follows:

1. MetroPlus Health Plan, HIOS ID 11177 (CSR Class and 2016 Risk Corridors Class)
2. CHRISTUS Health Plan, HIOS ID 72034 (CSR Class and 2016 Risk Corridors Class)
3. CHRISTUS Health Plan, HIOS ID 66252 (CSR Class and 2016 Risk Corridors Class)
4. Premera Blue Cross Blue Shield of Alaska, HIOS ID 38344 (CSR Class only)

Each of these class members was provided with the court-approved notice. The class members' opt-in forms for the CSR Class are attached as Exhibit A, and the class members' opt-in forms for the 2016 Risk Corridors Class are attached as Exhibit B. Plaintiff conferred with counsel for the Government, who stated that the Government does not oppose this motion to include these additional QHP Issuers in the CSR Class and/or 2016 Risk Corridors Class.

Dated: April 23, 2019

Respectfully submitted,

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*/s/ Stephen Swedlow*

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*Attorneys for Plaintiff Common Ground  
Healthcare Cooperative and the Class*

**CERTIFICATE OF SERVICE**

I certify that on April 23, 2019, a copy of the foregoing Plaintiff's Unopposed Second Motion to Include Additional Class Members was served via the Court's CM/ECF system on Defendant's counsel.

/s/ Stephen Swedlow  
Stephen Swedlow