

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

**IN RE: CHANGE HEALTHCARE, INC.  
CUSTOMER DATA SECURITY  
BREACH LITIGATION**

*This Document Relates To All Individual  
Actions*

Case No. 24-md-3108 (DWF/DJF)

**DEFENDANTS' MOTION TO  
DISMISS CONSOLIDATED CLASS  
ACTION COMPLAINT –  
INDIVIDUAL TRACK**

Defendants in the above-entitled action, by and through their undersigned counsel, hereby move to dismiss the claims asserted against them by Plaintiffs in the Consolidated Class Action Complaint brought in the Individual Track, *Christenson v. UnitedHealth Grp. Inc.*, Case No. 25-cv-183 (D. Minn), Dkt. 1, for all the reasons set forth in the accompanying memorandum of law and the Choice of Law memorandum.

This motion is supported by all files, records, and proceedings herein, as well as the accompanying memorandum of law, appendices, exhibits, and Choice of Law memorandum. A proposed order also accompanies this motion.

Respectfully submitted,

Dated: March 21, 2025

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