

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

IN RE: COGNIZANT TECHNOLOGY
SOLUTIONS CORPORATION AND
TRIZETTO PROVIDER SOLUTIONS,
LLC, DATA SECURITY BREACH
LITIGATION

MDL No. 3185

Case No. 4:26-md-3185-JAR

ALL CASES

CENTRALIZATION ORDER

This Order sets forth the specific responsibilities of Plaintiffs’ Co-Lead Counsel, Maureen Brady of McShane & Brady LLC and William B. Federman of Federman and Sherwood (“Co-Lead Counsel”), counsel for Defendants Cognizant and TriZetto, Jason Fagelman, Joseph Simmons, and Luke Maher of Norton Rose Fulbright US LLP (“TPS Counsel”), and Jill Fertel of Cipriani & Werner, P.C. as liaison counsel for the healthcare provider Defendants (together “Defendants’ Counsel”) with respect to proceedings brought in any state or federal court against any current or future Defendant in order to centralize litigation and resolution of Plaintiffs’ claims.

Related Actions

1. “Data Incident” refers to the data security incident reported by TriZetto Provider Solutions discovered in or around October 2025.
2. “Related Actions” shall refer to any case that seeks to bring consumer claims arising from the Data Incident.
3. All Related Actions shall be supervised and coordinated through this MDL to the full extent of this Court’s jurisdiction. For purposes of case management, discovery, settlement planning and settlement negotiations and to avoid duplication, promote efficiency, and ensure consistent positions and outcomes where appropriate, Co-Lead Counsel shall have sole authority

on behalf of the consumer plaintiffs to confer with Defendants' Counsel and defense counsel in any other centralized Related Actions concerning settlement planning and negotiations, discovery sequencing, protective orders, privilege protocols, ESI, and related case-management issues in this MDL, subject to further order of the Court.

4. Within fourteen (14) calendar days of Co-Lead Counsel or Defendants' Counsel learning that a Related Action has been filed, Defendants' Counsel shall file a notice on the MDL docket identifying the court, case caption, case number, filing date, the parties, and a brief description of the claims asserted and their relation to the MDL. If any of the information is unavailable, the notice shall state such and be supplemented promptly upon availability.

Additional Complaints

5. To eliminate delays associated with transfer by the Judicial Panel on Multidistrict Litigation to this Court of Related Actions filed in or removed to other federal district courts and to promote judicial efficiency, any plaintiff in a Related Action whose case would be subject to transfer to this MDL proceeding may file his or her case directly in the United States District Court for the Eastern District of Missouri as a related case to the MDL in accordance with the procedures set forth in this Order.

6. Any complaint in a Related Action that is filed directly in the Eastern District of Missouri pursuant to this Order shall be deemed directly filed in the MDL and filed as a new civil action in the Court's electronic filing system. At the time of filing, the complaint shall bear the caption set forth below and be accompanied by a civil cover sheet and summons. After review by the Clerk of Court's office, the case shall be assigned to the undersigned, consolidated for pretrial purposes in the MDL, and listed as a Member Case.

7. Any complaint in a Related Action directly filed in the MDL shall bear the following caption:

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

IN RE: COGNIZANT TECHNOLOGY
SOLUTIONS CORPORATION AND TRIZETTO
PROVIDER SOLUTIONS, LLC, DATA
SECURITY BREACH LITIGATION

This Document Relates To:

_____ ,

Plaintiff(s),

v.

_____ ,

Defendant(s).

MDL No. 3185

Case No. 4:26-md-3185-JAR

DIRECT FILED COMPLAINT [&
JURY DEMAND]

CIVIL ACTION NO.

8. Any complaint in a Related Action filed directly in this MDL proceeding must (a) comport with the Federal Rules of Civil Procedure and any MDL Orders in this proceeding, (b) specifically allege the district court in which the plaintiff would have otherwise filed the case, absent this Order, and (c) specifically allege the jurisdictional and venue basis for filing in that other court. If any complaint fails to comply with this provision, the plaintiff will have 30 days after notification by any Defendant to file an amended complaint to cure the defect. Failure to file an amended complaint that complies with this provision may result in the dismissal of the complaint without prejudice.

9. Plaintiffs, through Co-Lead Counsel, and Defendants shall have fourteen (14) calendar days from the date the Related Action is listed as a Member Case to confer and object by motion to the inclusion of the case in the MDL. The party in favor of inclusion in the MDL shall then have three (3) calendar days to file a response to any such objection. Failure to object as set forth herein shall constitute a waiver of any objection to inclusion of the case in the MDL for pretrial proceedings.

10. Except as provided in this Order, no direct filing shall operate to waive or otherwise limit any Defendant's right with respect to file motions to dismiss or to transfer based on improper venue, *forum non conveniens*, lack of personal jurisdiction, or the requirements of [28 U.S.C. § 1407\(a\)](#) and *Lexecon, Inc. v. Milberg Weiss*, [523 U.S. 26](#) (1998).

11. The direct filing of a Related Action in the MDL pursuant to this Order shall stop the running of any statute of limitations or prescriptive or preemptive period as if the complaint had been filed in an appropriate venue. Nothing in this paragraph shall be deemed as a waiver of any statute-of-limitations or other timeliness defense that accrued prior to the direct filing of a complaint under this Order.

12. Defendants reserve all rights to move to dismiss or otherwise respond to any directly filed complaint, consistent with a schedule to be entered by the Court. Until further order of this Court, all complaints directly filed in the MDL, any tag along actions subsequently transferred, and all cases originally filed in this Court or transferred or removed to this Court for inclusion in the MDL, are deemed answered and denied, without waiver of any defense.

Centralized Litigation

13. Co-Lead Counsel shall be solely responsible for settlement negotiations and planning with any Defendant in any Related Action in this MDL and for filing and entering into

any agreements to settle or compromise Plaintiffs' claims asserted in the MDL, including the presentation of such settlements to the Court for approval pursuant to Fed. R. Civ. P. 23. Co-Lead Counsel shall oversee, attend, and conduct any settlement discussions with any Defendant seeking to compromise claims asserted in the MDL, whether with a single Defendant or multiple Defendants, and whether purporting to resolve some or all claims pending in the MDL. No settlement shall be agreed to and/or submitted to the Court for approval except through Co-Lead Counsel.

SO ORDERED (Doc. 53) this 14th day of September 2026.

A handwritten signature in black ink, reading "John A. Ross", is positioned above a horizontal line.

JOHN A. ROSS
UNITED STATES DISTRICT JUDGE