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February 17, 2023

Via Electronic Mail

Mississippi Division of Medicaid
c/o Office of Procurement
Chief Procurement Officer (MSCANCHIP@medicaid.ms.gov)
Public Records Officer (RFI@medicaid.ms.gov)
Cody Smith (Cody.Smith@medicaid.ms.gov)

Tata Consultancy Services Limited
c/o Katelyn Beaudette Cooper (katelyn.cooper@tcs.com)

Re: Notice of and Reasons for Filing Petition for Protective Order

All:

RedMane Technology LLC (“RedMane”) received notice from the Mississippi Division of Medicaid (“DOM”) that a Public Records Act Request (“PRR”) was submitted by Tata Consultancy Services Limited (referred to herein as “Requesting Party”) in connection with DOM’s Request for Proposal Number 20220401 (“RFP”).

After reviewing the PRR and the notice received from DOM that identified responsive information to the Requesting Party’s PRR, RedMane has determined that the information contains trade secrets, confidential and proprietary commercial information, and confidential and proprietary information that is protected by the Mississippi Public Records Act. *See* Miss. Code Ann. § 25-61-9(1).¹ Examples of this information include, but are not limited to, the following:

- Confidential claims processing methods
- Confidential and proprietary information regarding trade secrets and proprietary technologies and processes
- Confidential market information
- Confidential performance data
- Confidential metrics and data analytics
- Confidential personnel data
- Confidential information concerning clients

¹ Miss. Code Ann. § 25-61-9(7) is not applicable to or required of RedMane because it was unsuccessful in its bid and not awarded a contract by the DOM. Nonetheless, it is RedMane’s understanding that DOM requests that all parties subject to a public records request provide this notice. However, by providing this notice, RedMane specifically does not waive its right to subsequently argue that subsection (7) is inapplicable, and this notice is not required of RedMane.

- Confidential work plans

This information is exempt from the Mississippi Public Records Act's presumption of accessibility and therefor may not be disclosed. *See* Miss. Code Ann. § 25-61-9(1), 79-23-1.

Accordingly, pursuant to Miss. Code Ann. § 25-61-9(7), RedMane hereby gives notice to the Requesting Party and to DOM that RedMane intends to seek a protective order from the Chancery Court of Hinds County, Mississippi to prevent the release of its information protected by the Mississippi Public Records Act.

RedMane respectfully requests that DOM, upon its receipt of this notice, immediately post it on the Mississippi procurement portal.

THIS, the 17th day of February, 2023.

RedMane Technology LLC

BY:



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