

WATKINS & EAGER

Mailing Address:
P.O. Box 650
Jackson, Mississippi 39205
Telephone: (601) 965-1900
Facsimile: (601) 965-1901

Attorneys and Counselors at Law

e s t . 1 8 9 5

Katie B. Lyons
Direct Dial: (601) 965-1983
E-mail: klyons@watkins-eager.com

January 19, 2026

Via Electronic Mail

Mississippi Division of Medicaid

c/o Public Records Officer (RFI@medicaid.ms.gov);
(Public.Records@medicaid.ms.gov);
(Faye.Christian @medicaid.ms.gov)

Conduent

c/o Karen Howell (khowell@brunini.com)

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

All:

Health Management Systems, Inc. ("HMS") received notice from the Mississippi Division of Medicaid ("DOM") that a Public Records Act Request ("PRR") was submitted by Conduent (referred to herein as "Requesting Party") for information related to HMS's contract with the DOM for Third Party Liability Data Matching and Recovery Services (Award Date 10/1/2013).

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

- Confidential business plans and strategies
- Confidential pricing data
- Confidential and proprietary information regarding trade secrets
- Confidential market information
- Confidential performance data and history
- Confidential internal policies
- Confidential personnel data
- Confidential information concerning clients

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

Accordingly, pursuant to Miss. Code Ann. § 25-61-9 (7), HMS hereby gives notice to the Requesting Party and to the DOM that HMS 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.

HMS respectfully requests that the DOM, upon receipt of this notice, post it on the Mississippi procurement portal in accordance with Miss. Code Ann. § 25-61-9.

Best regards,

/s/ Katie B. Lyons

Katie B. Lyons (MSB #105904)
WATKINS & EAGER PLLC
400 E. Capitol Street
Post Office Box 650 (39205-0650)
Jackson, Mississippi 39201
(601) 965-1983
klyons@watkinseager.com

Date of Request: 12/23/25 12:02 PM

OFFICE OF THE GOVERNOR

Walter Sillers Building | 550 High Street, Suite 1000 | Jackson, Mississippi 39201



NEW REQUEST FOR PUBLIC RECORDS

Name: Ana Quezada

Company: Conduent

Street Address: 100 Campus Dr. Ste 200 E

City: Florham Park

State: NJ

Zip Code: 07932

Email Address: FOIA.Requests@conduent.com

Phone Number: +1 (801) 568-8467

Preferred Format of Records: Electronic Copy

Preferred Method of Delivery: Email or link to files

Description of Public Record Requested:

Conduent formally requests publicly accessible information on the THIRD PARTY LIABILITY DATA MATCHING AND RECOVERY SERVICES contract, contract number 84897. These services are provided by INTEGRIGUARD, LLC (DBA HMS FEDERAL), Award Date 10/1/2013.

Requested information includes:

Finalized Contract and Attachments

Contract Amendments

Budgets

Service Level Agreements / Performance Standards

Vendor Provided Performance Reports

Corrective Action Plans (if applicable)

Approved Change Requests or Change Orders

If there are any associated fees we'd appreciate it if you can let us know in advance. Our preferred method of delivery is electronic.