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June 8, 2026

Via Electronic Mail

Mississippi Division of Medicaid
Public Records Compliance Officer
550 High Street, Suite 1000 |
Jackson, MS 39201
Phone: 601-359-6510
Email: Public.Records@medicaid.ms.gov

New York Times
c/o Chris Hamby (chris.hamby@nytimes.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 the New York Times (referred to herein as "Requesting Party") in connection with contracts 2013 (8200007283) and 2018 (8200041049).

After reviewing the PRR and the notice received from DOM that identified responsive information to the Requesting Party's PRR, HMS 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). 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 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 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

WATKINS & EAGER PLLC

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REQUEST FOR PUBLIC RECORDS

Date of Request:

[April 20, 2026](#)

Requestor:

Chris Hamby

[The New York Times](#)

[1627 I Street NW, Suite 700](#)

[Washington](#)

[DC](#)

[20006](#)

[202-450-8710](#)

chris.hamby@nytimes.com

Preferred Format of Records:

[Electronic Copy](#)

Preferred Method of Delivery:

[Email or link to files](#)



PRR-2026-00217

REQUEST FOR PUBLIC RECORDS

Identifiable Record #1

- Time Period of Requested Record:

January 1, 2014, to the present

- Records Requested:

Estate recovery contractor documents

- Additional Description of Requested Record:

Dear Public Records Officer,

This is a request for public records. I respectfully request copies of the records identified and described below – or of records containing the information identified and described below:

1.A copy of the most recent contract and any supporting documentation, such as attachments and appendixes, with Health Management Systems/Gainwell Technologies to perform services as part of the state's Medicaid estate recovery program. Please also include any contract amendments.

2.Records of all payments to Health Management Systems/Gainwell Technologies – or a previous contractor, if applicable – for its services related to the state's Medicaid estate recovery program from January 1, 2014, to the present.

I am willing to discuss how this request can reasonably be narrowed. Please don't hesitate to reach out by phone (202-450-8710) or email (chris.hamby@nytimes.com).

If possible, please produce records on a rolling basis. Please provide the records in electronic format, if possible, and include any supporting documentation necessary to understand the data, such as data dictionaries, record layouts and codebooks.

As a member of the news media, I respectfully request that you waive or reduce any fees. I am seeking the records to produce a story on a matter of public interest and not primarily in furtherance of a private commercial interest. If you estimate charging fees greater than \$100, please contact me before proceeding.

If you determine that any portions of the requested records are exempt from disclosure, please cite the specific exemption you believe applies.

Sincerely,

Chris Hamby