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IOWA DEPARTMENT OF JUSTICE
OFFICE OF THE ATTORNEY GENERAL

October 2, 2025

Kristi Onstot
Executive Secretary
Executive Council
State Capitol

**Re: Request to retain special counsel for Blue Cross Blue Shield
antitrust litigation**

Dear Kristi:

Our office requests authorization under Iowa Code section 13.7 to retain the law firms of Barze Taylor Noles Lowther LLC and Bradley Arant Boult Cummings LLP as special counsel.

A. Scope of representation.

Barze Taylor and Bradley Arant will provide legal services and representation to Iowa—specifically, University of Iowa Health Care—with respect to the antitrust lawsuit against Blue Cross Blue Shield related entities for violations of state and federal antitrust laws, for which the Executive Council has already approved retention of Paul Hastings LLP as special counsel.

B. Necessity and propriety of retaining special counsel.

The Attorney General has determined that it is necessary and appropriate to retain private special counsel for this representation. The defendants have obtained a preliminary transfer of the lawsuit to the U.S. District Court for the Northern District of Alabama. That court's Local Rule 83.1(b)(2) requires that Paul Hastings, which does not have an office in the Northern District of Alabama, designate local counsel that has a physical presence in the court's geographic jurisdiction.

Both Barze Taylor and Bradley Arant have offices in the Northern District of Alabama and lawyers who are experienced with practice in

that court and major commercial litigation like this case. They are also serving as local counsel for the other plaintiffs in this lawsuit, whom Paul Hastings also represents. Their contact information is:

Barze Taylor Noles Lowther LLC	Bradley Arant Boult Cummings LLP
Lakeshore Park Plaza	One Federal Place
2204 Lakeshore Dr., Ste. 425	1819 5th Avenue N
Birmingham, AL 35209	Birmingham, AL 35203

C. Fee arrangements.

Paul Hastings will pay Barze Taylor's and Bradley Arant's hourly fees. Those fees constitute case expenses under the representation agreement with Paul Hastings, meaning they, and the risk that they will not be recovered, will be carried by Paul Hastings until the conclusion of the representation and will be reimbursed to Paul Hastings out of any recovery.

D. Conclusion.

The Attorney General's office requests that the Executive Council approve the hiring of Barze Taylor Noles Lowther LLC and Bradley Arant Boult Cummings LLP as special counsel to represent the state.

Yours truly,



Steven Blankinship
Chief Deputy Attorney General