

The Supreme Court of the State of Louisiana

STATE OF LOUISIANA

No. 2025-C-00911

VS.

OPTUMRX, INC. AND UNITED
HEALTHCARE OF LOUISIANA, INC. D/B/A
UNITED HEALTHCARE COMMUNITY PLAN

IN RE: State of Louisiana - Applicant Plaintiff; Applying For Writ Of Certiorari,
Parish of East Baton Rouge, 19th Judicial District Court Number(s) C-717,848,
Court of Appeal, First Circuit, Number(s) 2024 CA 0596;

November 12, 2025

Writ application granted. See per curiam.

JDH

JLW

JBM

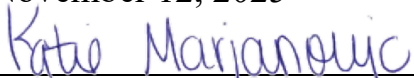
PDG

JMG

CRC

Crain, J., recused.

Supreme Court of Louisiana
November 12, 2025



Chief Deputy Clerk of Court
For the Court

SUPREME COURT OF LOUISIANA

No. 2025-C-911

STATE OF LOUISIANA

VS.

**OPTUMRX, INC. AND UNITED HEALTHCARE OF LOUISIANA, INC.
D/B/A UNITED HEALTHCARE COMMUNITY PLAN**

On Writ of Certiorari to the Court of Appeal, First Circuit,
Parish of East Baton Rouge

PER CURIAM

Writ granted. A judgment was rendered by the district court in this matter on March 13, 2023 (the Discovery Judgment), granting a motion to compel delinquent discovery filed by the State of Louisiana against United Healthcare of Louisiana, Inc. and OptumRx, Inc. (collectively, United.) Therein, the district court specified what records United was required to produce, as well as the applicable deadlines. The Discovery Judgment further specifically found that the requested documents, including certain out-of-state documents, were relevant to this litigation and must be produced in unredacted form. United sought review of the Discovery Judgment with the First Circuit Court of Appeal, as well as with the Louisiana Supreme Court, but both courts denied writs. See State v. OptumRx, Inc., 23-272 (La. App. 1 Cir. 3/23/23), 2023 WL 2609637, writ denied, 23-474 (La. 5/2/23), 360 So.3d 12.

Thereafter, on August 3, 2023, the trial court rendered a judgment (the Sanctions Judgment), granting a motion for sanctions and attorneys' fees that was filed by the State as a result of United having yet to fully comply with the Discovery Judgment. Following a hearing, the amount of the awarded attorneys' fees was set forth in a judgment rendered on October 9, 2023 (the Attorneys' Fee Judgment).

United sought review of the Sanctions Judgment and the Attorneys' Fee Judgment. On appeal, the First Circuit Court of Appeal reversed, in part, both the

Discovery and Sanctions Judgments and vacated the Attorneys' Fee Judgment. Specifically, the court of appeal found that the district court abused its discretion when it found that the requested out-of-state records were relevant and should be produced, and when it sanctioned United for its failure to produce certain other records that were ordered to be produced pursuant to the Discovery Judgment. Additionally, the court of appeal concluded that, in finding that United violated the Discovery Judgment by placing a watermark across the records that were produced, the district court committed manifest error. The court of appeal further found that numerous other factual findings of the district court were manifestly erroneous and/or clearly wrong. Based on these findings the appellate court reversed, in part, both the Discovery and Sanctions Judgments, and vacated the Attorneys' Fee Judgment.

The court of appeal correctly noted that, with regard to the many issues that involve questions of fact, the appropriate standard of review is the manifest error-clearly wrong standard, pursuant to which an appellate court cannot set aside a district court's finding of fact unless the finding is "clearly wrong" in light of the record reviewed in its entirety. ("The court must review the entire record... .") **Hayes Fund for First United Methodist Church of Welsh, LLC v. Kerr-McGee Rocky Mountain, LLC**, 14-2592, p. 8 (La. 12/8/15), 193 So.3d 1110, 1115. To reverse a district court's factual finding, a court of appeal must find that there is no reasonable factual basis in the record to support the finding, such that it is "clearly wrong." See **Stobart v. State through Dept. of Transp. & Dev.**, 617 So. 2d 880, 882 (La. 1993). This requires more than reviewing the record for some evidence supporting or controverting the district court's finding. **Id.** The manifest error-clearly wrong standard is therefore not easily met, as it is rare that no reasonable basis exists to support a finding of a district court. See **Hayes**, 193 So. 3d at 1116; **Johnston v. Vincent**, 21-1196 (La. 2/1/23), 359 So.3d 896, 911. Although the

appellate court acknowledged that the manifest error-clearly wrong standard of review was applicable to the district court's factual findings in this case, it nevertheless failed to apply that standard. Specifically, rather than conducting a review of the record to determine if any reasonable factual basis to support the findings existed, the appellate court stated in its opinion that, "[t]his [c]ourt is not required to sift through the record to unearth a reasonable factual basis for the trial court's factual findings." Instead, the court of appeal noted that United pointed to evidence in the record "refuting" the trial court's factual findings and the State failed to provide the court with record references to any supporting evidence.

Moreover, the court of appeal further found the district court's determination that certain documents were relevant to be an abuse of discretion. As noted by the dissent, the appellate court reversed the district court finding without any sort of review of the disputed documents and despite the fact that the trial court, which has presided over these parties and this litigation for many years, specifically found that the documents were discoverable. In any event, the district court's relevancy determination was set forth in its Discovery Judgment, for which United previously sought, and was denied, relief by both the First Circuit Court of Appeal and the Louisiana Supreme Court. As such, this issue was not properly before the appellate court for review. Rather, review is limited to the Sanctions Judgment and the Attorneys' Fee Judgment. The appellate court's rulings are vacated and this matter is remanded to the court of appeal to reconsider the Sanctions Judgment and the Attorneys' Fee Judgment following a thorough review of the record *in its entirety*, as is required for a proper application of the manifest error-clearly wrong standard of review.

WRIT GRANTED; RULINGS VACATED; and REMANDED.