

NOTICE AND REASONS FOR PROTECTIVE ORDER
PURSUANT TO MISS. CODE ANN. § 25-61-9(7) (REV. 2018)

TO: FEI Systems
Attn: Scott Morrow
9755 Patuxent Woods Drive, Suite 300
Columbia, MD 21046

Conduent State Healthcare, LLC
Attn: Shneen Cannady
100 Campus Drive
Florham Park, NJ 07932

with copy to:
Mississippi Division of Medicaid
Attn: Cody Smith
550 High Street, Suite 1000
Jackson, MS 39202

FROM: RedMane Technology LLC (“RedMane”)
8614 W Catalpa Ave, Suite 1001
Chicago, IL 60656

RE: Public Records Requests (“PPRs”) regarding RFP Number 20220401

Mr. Morrow and Ms. Cannady:

Pursuant to the provisions of MISS. CODE ANN. § 25-61-9(7) (Rev. 2018), RedMane hereby gives notice (the “Notice”) to Scott Morrow, FEI Systems and Shneen Cannady, Conduent State Healthcare, LLC, the requestors issuing PRRs, of its intent to seek a protective order from the Chancery Court of Hinds County, Mississippi, First Judicial District, seeking to protect RedMane’s confidential and proprietary information and trade secrets contained in its proposal and any supplemental proposals and submissions to Mississippi Division of Medicaid related to System Support & Hosting of the Medicaid Eligibility System project, and its reasons for the protective order. This Notice is given in accordance with the Mississippi Rules of Civil Procedure to the following:

- (1) FEI Systems
Attn: Scott Morrow
9755 Patuxent Woods Drive, Suite 300
Columbia, MD 21046

- (2) Conduent State Healthcare, LLC
Attn: Shneen Cannady
100 Campus Drive
Florham Park, NJ 07932

Further, likewise pursuant to the provisions of MISS. CODE ANN. § 25-61-9(7) (Rev. 2018), the reasons RedMane intends to seek a protective order include the fact that its unredacted proposal and subsequent submissions contain exempt trade secrets and confidential commercial and financial information not subject to public disclosure, including, but not limited to, protected cost and pricing information; financial statements; business references; performance history; information about other contracts; business plans and strategies developed by RedMane; organization charts; key personnel resumes; excerpts of internal policies and procedures; other excerpts and data from copyrighted software and online programs, none of which should be disclosed to the requestor (or otherwise), pursuant to the Mississippi Public Records Act exemptions, including those found in MISS. CODE ANN. § 25-61-1 and 79-23-1(1).


RedMane recognizes the provisions of MISS CODE ANN. § 25-61-9(7) (Rev. 2018) which provide that the overall price to be paid for the Contract is not a protected trade secret nor confidential commercial or financial information under that section and RedMane has no objection to Mississippi Division of Medicaid releasing the overall price to be paid for the Contract to the requestors in its response to their PRRs. Further, RedMane has no objection to Mississippi Division of Medicaid releasing a copy of its redacted proposal to the requestors.

Unless the requestors withdraw or modify their PRRs within seven days, RedMane will file its Petition for Protective Order in the Chancery Court of Hinds County, Mississippi, First Judicial District. This Notice, which includes the reasons for the Protective Order, will be posted on the Mississippi procurement portal (MAGIC) for a minimum of seven days before RedMane files its Petition seeking the Protective Order in Chancery Court in accordance with the requirements of the applicable statutes and rules.

Any questions related to this Notice or the reasons for the Petition for Protective Order should be directed to the undersigned counsel for RedMane.

THIS, the 14th day of December, 2022.

RedMane Technology LLC

BY: 
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