

DOCKET NO. HHD-CV22-6152239-S	:	SUPERIOR COURT
	:	
JOHN BROWN; LISA FAGAN; MICHAEL FAGAN; JEFFREY FORDE; MICHAEL MORGAN; JOSHUA PAWELEK;	:	J.D. OF HARTFORD
AND JOHN STOEHR, as individuals	:	
and on behalf of all others similarly situated	:	
<i>Plaintiffs;</i>	:	
	:	
v.	:	
	:	
HARTFORD HEALTHCARE CORPORATION	:	
<i>Defendant.</i>	:	APRIL 25, 2022

JOINT MOTION FOR EXTENSION OF TIME TO PLEAD

Pursuant to Connecticut Practice Book §§ 10-6 *et seq.*, the Plaintiffs, John Brown, Lisa Fagan, Michael Fagan, Jeffrey Forde, Michael Morgan, Joshua Pawelek and John Stoehr (collectively, “Plaintiffs”), and the Defendant, Hartford HealthCare Corporation (“Hartford HealthCare”) jointly move the Court for an extension of time: (1) of thirty (30) days through and including June 13, 2022, for Hartford HealthCare to answer, move or otherwise respond to Plaintiffs’ Amended Complaint dated April 12, 2022, and (2) of thirty (30) days through and including August 12, 2022, for Plaintiffs to respond to Hartford Healthcare’s responsive pleading.

In support of this motion, Plaintiffs and Defendants jointly state as follows:

1. Plaintiffs filed their Amended Complaint pursuant to Practice Book § 10-59 as of right on April 12, 2022.
2. Hartford HealthCare requires additional time to conduct the factual and legal investigation necessary to respond appropriately to the Amended Complaint.
3. Plaintiffs will require an equal amount of additional time to respond to Hartford HealthCare’s anticipated responsive pleading.

4. This is the first request for an extension of time to answer, move or otherwise respond to the Amended Complaint. Hartford HealthCare's time to do so has not yet expired.

5. This case has not been assigned for trial and the Court's granting of this motion will neither cause undue delay in the progression of this case nor cause prejudice to any party involved.

WHEREFORE, the parties jointly request that the Court grant an extension of time (1) of thirty (30) days through and including June 13, 2022, for Hartford HealthCare to answer, move or otherwise respond to Plaintiffs' Amended Complaint dated April 12, 2022, and (2) of thirty (30) days through and including August 12, 2022, for Plaintiffs to respond to Hartford Healthcare's responsive pleading, together with such other and further relief that the Court deems proper.

PLAINTIFFS,

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**Pro hac vice application forthcoming*

**DEFENDANT,
HARTFORD HEALTHCARE
CORPORATION**

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CERTIFICATION OF SERVICE

The undersigned hereby certifies that on April 25, 2022 a copy of the foregoing was or will immediately be mailed or electronically delivered to counsel of record as follows:

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