

DOCKET NO. HHD-CV22-6152239-S	:	SUPERIOR COURT
	:	
JOHN BROWN; LISA FAGAN; MICHAEL FAGAN; JEFFREY FORDE; MICHAEL MORGAN; JOSHUA PAWELEK; and JOHN STOEHR, as individuals and on behalf of all others similarly situated,	:	J.D. OF HARTFORD
	:	
	:	AT HARTFOD
	:	
<i>Plaintiffs,</i>	:	
	:	
v.	:	
	:	
HARTFORD HEALTHCARE CORPORATION	:	
	:	
<i>Defendant.</i>	:	July 8, 2022

PLAINTIFFS’ OBJECTION TO DEFENDANT’S CHOICE OF LOCATIONS IN ITS APPLICATION FOR REFERRAL TO THE COMPLEX LITIGATION DOCKET

Plaintiffs, John Brown, Lisa Fagan, Michael Fagan, Jeffrey Forde, Michael Morgan, Joshua Pawelek, and John Stoehr, individually, and on behalf of all others similarly situated, hereby object to Defendant Hartford HealthCare Corporation’s (“HHC”) application for referral to the Complex Litigation Docket (the “Application”), only to the extent that the Plaintiffs disagree with the order of preference that the Defendant listed on the Application.

1. Defendant filed the Application on June 23, 2022. In it, HHC expressed a location preference in the following order: (1) Stamford; (2) Hartford; and (3) Waterbury. It claimed that the Stamford location was more convenient for “parties and counsel” and that Hartford would be convenient for HHC’s trial witnesses.

2. Plaintiffs consent to transferring the action to the CLD, but disagree with Defendant’s location preferences. The case should remain in Hartford. The majority of the Plaintiffs are from locations, including Farmington, West Simsbury, and Glastonbury, that are closer to Hartford or Waterbury, while the other Plaintiffs reside approximately the same distance from Hartford and Stamford. Also, Hartford (and then Waterbury) likely will be more convenient

for the majority of the putative class members. HHC is headquartered in Hartford and its co-counsel is located in Hartford. As Defendant notes, Hartford will be more convenient for witnesses. Most of the attorneys in the case will have to travel for the case, and the difference between locations is negligible. Accordingly, Plaintiffs' location preference is: (1) Hartford; (2) Waterbury; and (3) Stamford.

For these reasons, the Plaintiffs respectfully request that the case be transferred to the CLD in in accordance with Plaintiffs' location preferences.

/s/ Peter Gwynne

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**Pro hac vice application forthcoming*

CERTIFICATE OF SERVICE

I certify that on July 8, 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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