

DOCKET NO. X03-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, <i>Plaintiffs;</i>	:	COMPLEX LITIGATION DOCKET AT HARTFORD
	:	
v.	:	
	:	
HARTFORD HEALTHCARE CORPORATION <i>Defendant.</i>	:	JULY 31, 2022

JOINT MOTION TO RESCHEDULE REMOTE STATUS CONFERENCE

Plaintiffs John Brown, Lisa Fagan, Michael Fagan, Jeffrey Forde, Michael Morgan, Joshua Pawelek, and John Stoehr (“Plaintiffs”), and Defendant, Hartford HealthCare Corporation (“Hartford HealthCare”), jointly request that the Court reschedule the remote status conference currently scheduled for August 5, 2022, to a date at least thirty (30) days thereafter, and extend the deadline to submit pre-status conference position papers accordingly. In support of this Motion, the parties submit that good cause for such rescheduling exists, as follows:

1. Plaintiffs filed their Amended Complaint pursuant to Practice Book § 10-59 as of right on April 12, 2022. (Dkt. #103.00.)
2. The parties filed a Joint Motion for Extension of Time to Plead on April 25, 2022. (Dkt. # 104.00.) By it, the parties requested (1) that Hartford HealthCare have until June 13, 2022 to answer, move or otherwise respond to Plaintiffs’ Amended Complaint (which it did, by its June 13, 2022 Request to Revise (Dkt. #105.00), and (2) that Plaintiffs have until August 12, 2022 to respond to Hartford HealthCare’s responsive pleading (which Plaintiffs intend to timely do, by August 12, 2022).

ORAL ARGUMENT NOT REQUESTED

3. The action was transferred to the Complex Litigation Docket on July 18, 2022, (Dkt. #108.86), and assigned to the Honorable John B. Farley. The Joint Motion for Extension of Time to Plead had not appeared on any short calendar before transfer to the Complex Litigation Docket, and therefore has not yet been ruled on. The parties nevertheless have operated so as to meet the deadlines they had jointly proposed.

4. By Notice issued July 22, 2022 (Notice Seq. #1), the Court has scheduled a remote initial status conference for 11:00 AM on August 5, 2022. Plaintiffs will file their response to Hartford HealthCare's Request To Revise by one week later, on August 12, 2022.

5. In the interest of judicial efficiency, the parties request that the initial status conference be rescheduled from August 5, 2022 to a date that is at least thirty (30) days thereafter, to allow plaintiffs to file their response to Hartford HealthCare's Request to Revise, and Hartford HealthCare to review such response. To the extent any discussion between the parties would be productive at that point regarding the revised pleading, the parties would endeavor to promptly conduct such discussions and in any event be better positioned to provide the Court with the most informed and up to date positions about the proposed timing for additional motion practice and closing the pleadings, all of which would also inform the scheduling of subsequent litigation steps.

6. The parties further request that if the Court reschedules the status conference as proposed herein, that the requirement to submit position papers three days in advance of the status conference as set forth in the July 22, 2022 Notice also be extended accordingly, so that the deadline to submit position papers would precede the rescheduled conference.

7. Rescheduling the August 5, 2022 Status Conference by thirty days would not impact other deadlines set by the Court, as this Motion is being made before the Court has put in place a scheduling order to govern the proceedings.

WHEREFORE, the parties joint request that the Court reschedule the remote status conference currently scheduled for August 5, 2022, to a date at least thirty (30) days thereafter, and likewise extend the deadline to submit position papers as set forth in the July 22, 2022 Notice accordingly, together with such other and further relief that the Court deems proper.

PLAINTIFFS,

/s/ Peter Gwynne

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CERTIFICATION OF SERVICE

The undersigned hereby certifies that on July 31, 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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