

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,	:	COMPLEX LITIGATION
	:	DOCKET AT HARTFORD
	:	
	:	
<i>Plaintiffs,</i>	:	
	:	
v.	:	
	:	
HARTFORD HEALTHCARE CORPORATION	:	
	:	
<i>Defendant.</i>	:	SEPTEMBER 16, 2022

JOINT PROPOSED SCHEDULING ORDER

As discussed at the September 8, 2022 initial remote status conference with the Court, the parties in the above captioned matter stipulate and agree to the following proposed Scheduling Order and respectfully request that the Court enter the deadlines set forth herein as an order of the Court.

1. Plaintiffs shall file a Second Amended Complaint on or before October 24, 2022.
2. The parties anticipate that Defendant will move to strike the Second Amended Complaint. Accordingly, Defendant shall file its motion to strike within 60 days of Plaintiffs' filing of the Second Amended Complaint, or December 23, 2022, whichever comes first.
3. Plaintiffs shall file their opposition to the motion to strike within 60 days of the filing of Defendant's motion to strike, or February 21, 2023, whichever comes first.
4. Defendant shall file its reply brief in support of the motion to strike within 30 days of the filing of Plaintiffs' opposition, or March 23, 2023, whichever comes first.
5. Oral argument on the motion to strike will be held at 10:00 AM on May 1, 2023, as previously scheduled by the Court.

6. If the motion to strike is not granted in full, the parties shall meet and confer no later than 10 days after the Court's decision on the motion to further discuss and attempt to agree on proposed deadlines for fact and expert discovery, class certification briefing, summary judgment motions, other pre-trial matters, and ultimately a trial date (if applicable).

7. No later than 10 days after the meet and confer period, the parties shall submit a joint status report and proposed scheduling order to the Court.

8. It is the parties' shared understanding that prior to issuance of the Court's decision on Defendant's motion to strike, Plaintiffs intend to serve limited written discovery requests seeking copies of Hartford HealthCare's agreements with health insurers regarding prices to be paid by those insurers to Hartford Healthcare, and communications with health insurers about those agreements. If Plaintiffs do so, Defendant will serve any objections and written responses to such discovery requests, and the parties will discuss in good faith and attempt to resolve any objections and endeavor to make limited productions of responsive documents (to the extent such productions are not overly burdensome) before the motion to strike is decided. The parties reserve the right to move the Court for relief with respect to only these limited requests if necessary, in accordance with the discovery requirements set forth in the Court's case management order.

DEFENDANT HARTFORD
HEALTHCARE CORPORATION,

PLAINTIFFS JOHN BROWN; LISA FAGAN;
MICHAEL FAGAN; JEFFREY FORDE;
MICHAEL MORGAN; JOSHUA PAWELEK;
and JOHN STOEHR,

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CERTIFICATE OF SERVICE

I certify that on September 16, 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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