

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

SAINT FRANCIS HOSPITAL AND
MEDICAL CENTER, INC.,
Plaintiff,

v.

HARTFORD HEALTHCARE
CORPORATION, HARTFORD
HOSPITAL, HARTFORD
HEALTHCARE MEDICAL GROUP,
INC., INTEGRATED CARE
PARTNERS, LLC

Defendants.

Case No. 22-cv-00050-SVN

July 29, 2025

INTERVENORS' STATUS REPORT

Intervenors John Brown, Lisa Fagan, Michael Fagan, Michael Morgan, Joshua Pawelek, John Stoehr, Advancing CT Together (collectively, the “*Brown* Plaintiffs”), and Estuary Transit District and Teamsters 671 Health Services & Insurance Plan (collectively, the “*Estuary* Plaintiffs,” and together with the *Brown* Plaintiffs, “Intervenors”) file this report regarding the status of their discovery efforts as they relate to documents protected by Paragraph 16 of the operative Protective Order in this case (ECF No. 120).¹

Background

On February 14, 2025, Intervenors moved this Court for emergency relief to permit them

¹ Paragraph 16 of the Protective Order provides: “Upon final termination of this action, all Designated Material and copies thereof shall be returned promptly (and in no event later than forty-five (45) days after entry of final judgment), returned to the producing party, or certified as destroyed to counsel of record for the party that produced the Designated Material, or, in the case of deposition testimony regarding designated exhibits, counsel of record for the Designating Person. Alternatively, the receiving party shall provide to the Designating Person a certification that all such materials have been destroyed.”

to intervene in this matter for the limited purpose of requesting a temporary stay of the obligations set forth in Paragraph 16 of the operative Protective Order in order to preserve documents that were requested in and are relevant to Intervenor's respective cases pending against Defendant Hartford HealthCare Corporation ("HHC") in both state court and federal court in Connecticut.² That same day, the Court granted in part Intervenor's motion for emergency relief, suspending the parties' obligations under Paragraph 16 of the Protective Order until resolution of the motion. ECF 308. Following full briefing, the Court granted the motion on March 7, 2025, extending the stay of the parties' obligations under Paragraph 16 of the Protective Order to June 5, 2025 to permit the Intervenor the opportunity to obtain discovery. ECF No. 312. The Court also ordered the Intervenor to file a status report on May 22, 2025, to provide the Court an update regarding the status of their discovery as it relates to the documents currently protected by Paragraph 16. *Id.* Intervenor filed their May 22, 2025 status report, requesting an extension of the stay of the parties' obligations under Paragraph 16 of the Protective Order through August 5, 2025. ECF No. 313. On June 2, 2025, the Court granted Intervenor's requested extension and ordered them to file a status report on July 29, 2025, regarding the status of that discovery. ECF No. 318.

Update on Status of Discovery

On January 30, 2024, and October 4, 2024, the *Brown* and *Estuary* Plaintiffs, respectively, served discovery requests on HHC seeking documents produced by any party or non-party in the *Saint Francis* matter (this case). By March 28, 2025, the *Brown* Plaintiffs had also served subpoenas on Saint Francis and other non-parties in this matter seeking, among other things, the

² Intervenor the *Brown* Plaintiffs filed an action against HHC in State Court in Connecticut (*Brown, et al., v. Hartford HealthCare Corp.*, No. X03-HHD-CV22-6152239-S (Conn. Super. Ct.), before Judge John Burns Farley. Intervenor the *Estuary* Plaintiffs filed an action against Defendants HHC, Hartford Hospital, Hartford HealthCare Medical Group, Inc., and Integrated Care Partners, LLC in *Estuary Transit District, et al. v. Hartford HealthCare Corp., et al.*, No. 3:24-cv-01051 (D. Conn.), before Judge Sarah F. Russell.

documents they produced to the parties here. Intervenor has received documents pursuant to these discovery requests, which they are actively reviewing.

Given these circumstances, Intervenor is not requesting an extension of the stay of the parties' obligations outlined in Paragraph 16 of the Protective Order beyond August 5, 2025.

Dated: July 29, 2025

Respectfully submitted,

/s/ Jonathan M. Shapiro

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