

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

Judge Sarala Nagala

Magistrate Judge Robert Richardson

JOINT MOTION TO DELAY JOINT REPORT

The parties hereto, by and through their counsel, hereby jointly move the Court to delay the date scheduled for a joint report on discovery in the captioned matter, and in support thereof state as follows:

1. This Court's Order [ECF No. 99] dated December 14, 2022, directed the parties to file a joint report on discovery by February 17, 2023, addressing, among other things, whether there were any outstanding discovery disputes.

2. On Monday, February 13, 2023, this Court issued its Ruling and Order on Defendants' Motion to Dismiss [ECF No. 100], dismissing certain claims in this case.

3. The parties need additional time in order to assess the impact of that decision on pending discovery, and to determine whether there are any disputes regarding that impact concerning which they will need to notify the Court. Additionally, the dismissal of these claims may impact the total burden of discovery, and therefore the time periods within which document discovery can be completed. Therefore, the parties also need additional time within which to accurately report to the Court regarding their expectations regarding the timing of production of documents.

4. The parties are in the midst of negotiations with a wide range of third parties regarding document subpoenas addressed to those third parties. They expect to have made substantial additional progress within the next two weeks, and will be in a better position at that time to inform the Court of any discovery disputes which they cannot resolve.

5. For all these reasons, the parties request that the due date for the joint report be adjourned for two weeks, until March 3, 2023, so that they can provide the Court with a more fulsome and useful assessment of the status of discovery in this case.

6. The parties were unable to file this motion three days in advance of the report date because of the time it took for them to assess the impact of the Court's decision on the report. This is the first extension of time sought with respect to this requirement to file a report on discovery.

WHEREFORE, the parties, by and through their counsel, request that the Court delay the date for a joint report on discovery to March 3, 2023.

Date: February 17, 2023

Respectfully submitted,

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Date: February 17, 2023

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