

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

May 22, 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).<sup>1</sup>

**Background**

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

---

<sup>1</sup> 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 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.<sup>2</sup> 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 No. 308. Both HHC and Saint Francis Hospital Medical Center ("Saint Francis") filed responses to Intervenor's motion, and neither objected to an extension of the stay. ECF Nos. 309, 310. 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 Intervenor the opportunity to obtain discovery. ECF No. 312. The Court also ordered 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 from return to the producing party or destruction by paragraph 16 of the Protective Order. *Id.*

### **Update on Status of Discovery**

On January 30 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 this case. By March 28, 2025, the *Brown* Plaintiffs also had served subpoenas on Saint Francis and several other non-parties that were subpoenaed in this matter, seeking, among other things, the documents they produced to the parties here (and therefore are subject to paragraph 16 of the Protective

---

<sup>2</sup> The *Brown* Plaintiffs filed an action against HHC in State Court in Connecticut (*Brown v. Hartford HealthCare Corp.*, No. X03-HHD-CV22-6152239-S (Conn. Sup. Ct.), before Judge John Burns Farley. 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 v. Hartford HealthCare Corp.*, No. 3:24-cv-01051 (D. Conn.), before Judge Sarah F. Russell.

Order). For most entities subpoenaed, counsel for the *Brown* Plaintiffs have had productive meet and confers and are continuing their negotiations regarding the subpoena requests. However, for a small minority of subpoenaed entities, the *Brown* Plaintiffs are still awaiting the appearance of counsel and accordingly have been unable to meet and confer with those entities about the *Brown* Plaintiffs' subpoenas.

Given these circumstances, Intervenor respectfully request that the Court continue the stay of the requirements of paragraph 16 of the Protective Order at ECF No. 120 until August 5, 2025. Intervenor expect to conclude all discussions with Saint Francis and the other subpoenaed non-parties within that time period.

Dated: May 22, 2025

Respectfully submitted,

/s/ Jonathan M. Shapiro

Jonathan M. Shapiro  
**Aeton Law Partners LLP**  
 311 Centerpoint Drive  
 Middletown, CT 06457  
 P: 860-724-2160  
 F: 860-724-2161  
 jms@etonlaw.com

Counsel for *Estuary Transit District and Teamsters 671 Health Services & Insurance Plan*

/s/ Peter A. Gwynne

Peter A. Gwynne  
 E. Danya Perry  
**Perry Law**  
 445 Park Ave., 7th Floor  
 New York, NY 10028  
 (212) 213-3070  
 pgwynne@danyaperryllp.com  
 dperry@danyaperryllp.com

Matthew L. Cantor  
 Lily M. Fagin  
**Shinder Cantor Lerner LLP**  
 14 Penn Plaza, 19th Floor  
 New York, NY 10122  
 (646) 960-8606  
 matthew@scl-llp.com  
 lfagin@scl-llp.com

J. Wyatt Fore  
**Shinder Cantor Lerner LLP**  
 600 14th St. NW, 5th Floor

Washington, DC 20005  
(646) 960-8612  
wyatt@scl-llp.com

Jamie Crooks  
Rucha Desai  
**Fairmark Partners LLP**  
400 7th St. NW, Suite 304  
Washington, DC 20004  
(619) 507-4182  
jamie@fairmarklaw.com  
rucha@fairmarklaw.com

Robin van der Meulen  
Matthew Perez  
**Scott+Scott Attorneys at Law LLP**  
The Helmsley Building  
230 Park Avenue, 24th Floor  
New York, NY 10169  
(212) 223-6444  
rvandermeulen@scott-scott.com  
matt.perez@scott-scott.com

Counsel for the *Brown* Plaintiffs

**CERTIFICATE OF SERVICE**

I hereby certify that on this day, a copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by email to all parties by operation of the Court's electronic filing system or by mail on anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

This 22<sup>nd</sup> day of May, 2025.

/s/ Jonathan M. Shapiro

Jonathan M. Shapiro