UNITED STATES DISTRICT COURT DISTRICT OF CONNECTICUT

SAINT FRANCIS HOSPITAL AND MEDICAL CENTER, INC.,

No. 3:22-cv-00050-AVC

Plaintiff,

v.

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

Defendants.

FEBRUARY 23, 2022

DEFENDANTS' MOTION TO DISMISS PLAINTIFF'S AMENDED COMPLAINT

Pursuant to Federal Rule of Civil Procedure 12(b)(6), Defendants Hartford HealthCare Corporation, Hartford Hospital, Hartford HealthCare Medical Group, Inc., and Integrated Care Partners, LLC, respectfully move this Court to dismiss the Amended Complaint of Plaintiff Saint Francis Hospital and Medical Center, Inc. ("St. Francis").

As detailed more fully in the accompanying memorandum of law, Plaintiff has failed to state a plausible claim upon which relief can be granted as to Counts I through IX of the Amended Complaint as to all Defendants. The Amended Complaint must therefore be dismissed in its entirety.

ORAL ARGUMENT REQUESTED

OF COUNSEL:

GIBSON, DUNN & CRUTCHER LLP

Stephen Weissman
Jamie E. France
1050 Connecticut Avenue, N.W.
Washington, DC 20036-5306
(202) 955-8690
sweissman@gibsondunn.com
jfrance@gibsondunn.com

Eric J. Stock Joshua J. Obear 200 Park Avenue New York, NY 10166-0193 (212) 351-4000 estock@gibsondunn.com jobear@gibsondunn.com

SHEPPARD MULLIN RICHTER & HAMPTON LLP

Thomas J. Dillickrath Leo Caseria 2099 Pennsylvania Avenue, N.W. Washington, DC 20006-6801 (202) 747-1900 tdillickrath@sheppardmullin.com lcaseria@sheppardmullin.com

Pro Hac Vice Applications Pending

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

/s/ Patrick M. Fahey
Patrick M. Fahey (ct13862)
Karen T. Staib (ct21119)
Shipman & Goodwin LLP
One Constitution Plaza
Hartford, CT 06103
Tel: 860-251-5000
Fax: 860-251-5219
pfahey@goodwin.com

Their Attorneys

kstaib@goodwin.com