

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 STATUS REPORT

The parties in the captioned matter, pursuant to this Court's order dated July 13, 2022 (Doc. No. 89), hereby submit the following status report regarding discovery in the captioned matter:

1. The parties filed a Rule 26(f) report on March 11, 2022 (Doc. No. 59). The report set forth a discovery schedule, and did include one dispute regarding the number of depositions to be taken in the case.

2. The discovery issues raised by the Rule 26(f) report were referred to Magistrate Judge Richardson, who ruled on the outstanding dispute regarding depositions on May 23, 2022 (Doc. No. 81).

3. The parties have addressed document requests to each other. Defendants have also sent document subpoenas to Trinity Health (the parent of Saint Francis) and Southern New England Health Care Organization, Inc. (which is owned 50% by Trinity Health of New England). Objections have been submitted in response to these document requests. The parties are preparing to meet and confer on their various objections and have exchanged organizational charts for the relevant entities.

4. The parties have agreed on a protective order to govern confidential treatment of documents produced in discovery, and have submitted a joint motion to the Court for approval of that protective order. The Court entered an Order approving the stipulated protective order on July 26, 2022.

5. The parties do not believe that it would be productive at this time to refer this case to a U.S. Magistrate Judge for a settlement conference.

Date: July 27, 2022

Respectfully submitted,

/s/ William S. Fish, Jr. (with permission)

William S. Fish, Jr. (ct24365)
wfish@hinckleyallen.com
Jeffrey Mirman (ct05433)
jmirman@hinckleyallen.com
Alexa Millinger (ct29800)
amillinger@hinckleyallen.com
Hinckley, Allen & Snyder LLP
20 Church Street
Hartford, CT 06103
Telephone: (860) 725-6200

/s/ David A. Ettinger

David A. Ettinger (P26537)
(Admitted *Pro Hac Vice*)
dettinger@honigman.com
Paul L. Fabien (P46727)
(Admitted *Pro Hac Vice*)
pfabien@honigman.com
Honigman LLP
660 Woodward Avenue
2290 First National Bldg.
Detroit, MI 48226
Telephone: (313) 465-7368
Fax: (313) 465-7369

Nicholas A. Burandt (P84113)
(Admitted *Pro Hac Vice*)
nburandt@honigman.com
Honigman LLP
155 N. Wacker Drive

Suite 3100
Chicago, IL 60606-1734
Telephone: (312) 429-6017
Fax: (312) 701-9335

Attorneys for Plaintiff

Date: July 27, 2022

Respectfully submitted,

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

/s/Stephen Weissman (with permission)
Stephen Weissman (451063)
(Admitted *Pro Hac Vice*)
sweissman@gibsondunn.com
Jamie E. France (1010887)
(Admitted *Pro Hac Vice*)
jfrance@gibsondunn.com
Gibson, Dunn & Crutcher LLP
1050 Connecticut Avenue, N.W.
Washington, DC 20036-5306
Telephone: (202) 955-8690

Eric J. Stock
(Admitted *Pro Hac Vice*)
estock@gibsondunn.com
Joshua J. Obear
(Admitted *Pro Hac Vice*)
jobear@gibsondunn.com
Gibson, Dunn & Crutcher LLP
200 Park Avenue
New York, NY 10166-0193
Telephone: (212) 351-4000

/s/Thomas J. Dillickrath (with permission)
Thomas J. Dillickrath (483710)
(Admitted *Pro Hac Vice*)
tdillickrath@sheppardmullin.co
Leo Caseria (1655936)
(Admitted *Pro Hac Vice*)
lcaseira@sheppardmullin.com
Sheppard Mullin Richter & Hampton LLP
2099 Pennsylvania Avenue, N.W.
Washington, DC 20006-6801
Telephone: (202) 747-1900

Attorneys for Defendants