

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

SAINT FRANCIS HOSPITAL AND MEDICAL
CENTER, INC.,

Case No. 3:22-cv-00050-SVN

Plaintiff,

v.

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

Defendants.

MOTION TO EXTEND CASE SCHEDULE

Pursuant to D. Conn. Local Rule 7(b), the parties hereto, by and through their counsel, jointly move for an extension of the schedule for discovery and dispositive motions in this case by one hundred twenty (120) days, and as good cause in support thereof state as follows:

1. This is an antitrust case involving substantial claims for which defendants' motion to dismiss is pending. Because of the intensive and extensive discovery involved in this case, the parties believe that an extension of the schedule by 120 days is necessary to allow discovery to be completed in an efficient and effective manner.

2. The parties have promulgated discovery requests requiring extensive discovery from each other. The resolution of these discovery issues, which is ongoing, has been a time-consuming process, necessitated by the mutual desire to obtain relevant documents while reducing the burden of discovery. The parties are still negotiating the number of custodians whose files are to be searched as well as the search terms to be applied to those files to generate documents to be reviewed for responsiveness. These negotiations have been proceeding since late August. They have taken a significant amount of time because of the complexity of the parties' requests and the

need to balance burden and relevance. While the parties are working expeditiously, finalizing custodians and search terms could take several more weeks.

3. After custodians and search terms are agreed upon, each party will need to review what will likely be at least several hundred thousand, if not over a million, documents to determine which documents are responsive to the requests. Each of the parties have promulgated more than 70 document requests to the other, and have proposed that documents be reviewed by more than 30 custodians. Responsive documents will also need to be reviewed for privilege, and privilege logs will need to be created. Each of the parties has also served a number of document requests on the other that do not involve particular custodians or search terms. After all of these documents are produced, the party receiving the documents will then need to review those documents in order to determine the individuals to be deposed and to prepare for those depositions. This process is likely to take several months.

4. In addition, Defendants have served subpoenas on Southern New England Healthcare Organization and Trinity Health. Saint Francis has served subpoenas on eight hospitals and five managed care entities, and Defendants have served subpoenas on four hospitals and noticed three more. It will take significant time for third parties who have received subpoenas to negotiate the scope of the subpoenas and produce those documents. Those documents will then also need to be reviewed prior to any depositions of personnel of the subpoenaed third parties.

5. In order to allow this process to be completed in the most efficient manner, while minimizing cost, the parties believe that a one hundred twenty (120) day extension of time before the commencement of fact depositions, and a commensurate one hundred twenty (120) day extension of the other dates in the current schedule, is necessary. The parties therefore request that the schedule be revised to reflect the 120 day extension as follows:

- A. Document production shall be complete by 5/15/2023 instead of 1/13/2023;
 - B. Non-expert depositions will begin on 5/16/23 and conclude by 8/9/23 instead of 1/16/23 and 4/11/23;
 - C. Plaintiff will designate all trial experts and provide their reports to defendants by 9/8/23 instead of 5/11/23;
 - D. Defendants will designate all trial experts and provide their reports to Plaintiff by 11/15/23 instead of 7/18/23;
 - E. Plaintiff's reply expert reports must be provided to defendants' counsel by 1/9/24 instead of 9/11/23;
 - F. Depositions of all experts are to be concluded by 2/8/24 instead of 10/11/23;
 - G. Discovery will be completed (not propounded) by 2/8/24 instead of 10/11/23; and
 - H. Dispositive Motions, if any are filed, are due by 3/12/24 instead of 11/13/23.
6. This is the parties' first request for an extension of the schedule.

WHEREFORE, the parties hereto jointly request an extension of the schedule in this case by 120 days.

Date: December 9, 2022

Respectfully submitted,

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