

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 FOR ENTRY OF PROTECTIVE ORDER

Plaintiff and Defendants, by and through their counsel, jointly move this Court to enter the proposed Protective Order attached hereto as Exhibit A, and in support thereof state:

1. Because this case involves the detailed business affairs of competitors, their customers and other third parties, a significant portion of discovery is very likely to involve disclosure to each of the parties of information which is confidential to another party or third parties.

2. For this reason, the parties believe that it is necessary for them to enter into a protective order to protect the confidentiality of materials that are confidential and subject to discovery. The parties have therefore agreed upon a proposed protective order which would create these confidentiality protections while permitting discovery to proceed in an efficient way.

WHEREFORE, Plaintiff and Defendants request this Court enter the proposed Protective Order attached hereto as Exhibit A.

Date: July 22, 2022

Respectfully submitted,

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

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