

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

URIEL PHARMACY HEALTH AND WELFARE
PLAN, on their own behalf and on behalf of all
others similarly situated,

Plaintiffs,

Case No. 2:22-cv-610-LA

v.

ADVOCATE AURORA HEALTH, INC. AND
AURORA HEALTH CARE INC.,

Defendants.

PATRICK SHAW; DEBRA SHAW; AND
HALEY SHAW, on their own behalf and on behalf
of all others similarly situated,

Plaintiffs,

Case No. 2:24-cv-157-LA

v.

ADVOCATE AURORA HEALTH, INC. AND
AURORA HEALTH CARE INC.,

Defendants.

JOINT MOTION TO EXTEND THE DEADLINE FOR THIRD-PARTY DISCOVERY

Defendants Advocate Aurora Health, Inc. and Aurora Health Care, Inc. and Plaintiffs Uriel Pharmacy Health and Welfare Plan, Uriel Pharmacy, Inc., Hometown Pharmacy, Hometown Pharmacy Health and Welfare Benefits Plan, Patrick Shaw, Debra Shaw, and Haley Shaw (collectively, the “Plaintiffs”; and together with Defendants, the “Parties”) jointly stipulate and move the Court to modify the Scheduling Order (Dkt No. 150) to extend the deadline for document and data third-party discovery in the above-captioned actions, and for depositions of third parties noticed by the date specified below, from July 31, 2025 to September 15, 2025. In support of this Joint Motion, the Parties state as follows:

1. The Parties have been diligently conducting third-party discovery in the above-captioned actions. The Parties substantially completed service of the vast majority of their subpoenas requesting data and documents from third parties by the end of October 2024, nine months before the close of fact discovery. The parties also served a small number of subpoenas requesting limited additional data from third parties five months ago, in February 2025. They subsequently followed up with third parties diligently to request and receive updates on whether the third parties would be able to timely produce documents and adduce testimony before the fact discovery deadline.
2. Notwithstanding the Parties' diligence, some third parties require additional time to produce materials in response to the subpoenas including due to the scope and complexity of the data productions involved, unforeseen delays, and the need to address follow up from counsel to the Parties after receiving and reviewing the productions.
3. The Parties have also diligently noticed the vast majority of the depositions of these third parties well in advance of the fact discovery deadline.
4. However, some third party witnesses and their counsel have identified scheduling conflicts that prevent their depositions from occurring before the fact discovery deadline on July 31, 2025.
5. Therefore, the Parties respectfully request that the Court replace the current deadline of July 31, 2025 for the "Close of Fact Discovery (including for Completion of Third-Party Depositions)" with the following deadlines:

Event	Original Date	Proposed Date
Deadline to Notice Fact Witness Depositions	N/A	July 14, 2025
Close of Fact Discovery as to all Party Discovery, including Party Depositions noticed by July 14, 2025	July 31, 2025	July 31, 2025
Close of Fact Discovery as to all Third-Party Discovery, including Third-Party Depositions noticed by July 14, 2025	July 31, 2025	September 15, 2025

6. The Parties are not requesting any other modifications to the schedule.

Dated: July 11, 2025

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Defendants.

[PROPOSED] ORDER

On July 11, 2025, Defendants Advocate Aurora Health, Inc. and Aurora Health Care, Inc. and Plaintiffs Uriel Pharmacy Health and Welfare Plan, Uriel Pharmacy, Inc., Hometown Pharmacy, Hometown Pharmacy Health and Welfare Benefits Plan, Patrick Shaw, Debra Shaw, and Haley Shaw (collectively, the “Parties”) filed a joint motion to amend the scheduling order in this action.

IT IS ORDERED that the Parties’ joint motion to amend the scheduling order is hereby **GRANTED**.

Dated: July __, 2025

BY THE COURT:

Hon. Lynn S. Adelman
U.S. District Court for the
Eastern District of
Wisconsin