

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN**

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URIEL PHARMACY HEALTH AND WELFARE  
PLAN,

*et al.*,

Plaintiffs,

v.

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

ADVOCATE AURORA HEALTH, INC.,

*et al.*

Defendants.

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**STIPULATED CIVIL L. R. 7(H) EXPEDITED NON-DISPOSITIVE MOTION TO  
AMEND THE SCHEDULING ORDER**

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Defendants Advocate Aurora Health, Inc. and Aurora Health Care, Inc. (collectively, “AAH”), and Plaintiffs Uriel Pharmacy Health and Welfare Plan, Uriel Pharmacy, Inc., Hometown Pharmacy, and Hometown Pharmacy Health (collectively, “Hometown”) and Welfare Benefits Plan (collectively, “Uriel”), jointly stipulate and move the Court to modify the Scheduling Order in this action (Dkt. No. 41).

1. On February 5, 2024, a separate action, *Patrick Shaw, et al. v. Advocate Aurora Health, Inc., et al.*, No. 2:24-cv-157 (E.D. Wis.) (the “*Shaw* Action”), was filed, and a scheduling order was entered on May 1, 2024. While plaintiffs in the *Shaw* Action seek to represent a different putative class, certain overlapping issues exist between this action and the *Shaw* Action.

2. The Parties therefore agree that discovery should be coordinated between this action and the *Shaw* Action to the extent practicable. Doing so would allow the Parties to avoid the burden of duplicative discovery.

3. To that end, pursuant to Fed. R. Civ. P. 29(b), the Parties have agreed to modify certain aspects of their Joint Discovery Plan and Preliminary Pretrial Report (Dkt. No. 39) to coordinate the two actions. The following modifications preserve the overall schedule for this action, do not otherwise interfere with the existing Scheduling Order, and are intended to be consistent with those discovery limitations agreed to in the *Shaw* Action.

4. Specifically, the Parties have stipulated that AAH shall not be subject to more than 20 interrogatories from the Plaintiffs (under Fed. R. Civ. P. 33) or more than 30 requests for admission from the Plaintiffs (under Fed. R. Civ. P. 36), not including requests related to the authentication and/or admissibility of documents.

5. The Parties have further stipulated that each side (*i.e.*, all Plaintiffs collectively, both in this action and the *Shaw* Action, being one side, and Defendants collectively being the other side) may take up to 435 hours of non-expert depositions, including non-Party depositions. The Parties stipulated that these limits may be increased by agreement or with leave of the Court by a showing of good cause that additional time is warranted. Absent agreement of the Parties or leave of the Court, the Parties have stipulated that no Party witness shall be deposed for more than one day of seven hours. And no expert witness shall be deposed for more than two days of seven hours per day.

6. In light of the above, good cause exists to modify the Scheduling Order in this action so that any applicable discovery deadlines are consistent with those in the *Shaw* Action.

7. Wherefore, pursuant to Civil L. R. 7(h), the Parties jointly move and respectfully request that the Court enter and modify the following deadline:

<b>Event</b>	<b>Date</b>
Deadline to Amend Pleadings or Add Parties As of Right	June 19, 2024
Substantial Completion of Production of Structured Data in Response to Requests for Production Served On or Before April 12, 2024	July 15, 2024

Respectfully submitted this 6th day of June, 2024.

/s/ Jamie Crooks

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