

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

ELECTRICAL MEDICAL TRUST and
PLUMBERS LOCAL UNION NO. 68
WELFARE FUND,

Plaintiffs,

v.

U.S. ANESTHESIA PARTNERS, INC.,
U.S. ANESTHESIA PARTNERS
HOLDINGS, INC., and U.S. ANESTHESIA
PARTNERS OF TEXAS, P.A.,

Defendants.

Civil Case No. 4:23-cv-04398

**JOINT STATUS REPORT REGARDING
DISCOVERY**

Hon. Alfred H. Bennett

Pursuant to the agreement in their previous joint status report (ECF No. 182), Plaintiffs Electrical Medical Trust and Plumbers Local Union No. 68 Welfare Fund (“EMT Plaintiffs”) and Defendants U.S. Anesthesia Partners, Inc., U.S. Anesthesia Partners Holdings, Inc., and U.S. Anesthesia Partners of Texas, P.A. (“USAP”) submit this joint status report to update the Court on the progress of discovery.

Listed below are discovery issues that are pending before the Court or that the parties continue to negotiate and may raise at a future date. The parties propose to file their next joint status report on May 14, 2026.

A. USAP’s Productions (In Progress)

USAP has produced more than 400,000 documents to date. USAP substantially completed production of documents responsive to Plaintiffs’ First Set of Requests for Production in February 2026. On March 11, 2026, the EMT Plaintiffs served their Second Set of Requests for Production on USAP.

B. Plaintiffs' Productions (In Progress)

The EMT Plaintiffs have produced more than 14,000 documents to date. The EMT Plaintiffs substantially completed production of documents responsive to all presently agreed-upon search parameters in December 2025. USAP is continuing to review the EMT Plaintiffs' production to identify any deficiencies and determine whether additional document productions or custodians are necessary. The EMT Plaintiffs continue to meet with UnitedHealthcare Group, which has commenced a pull of Plaintiff Plumbers' claims data. On February 20, 2026, USAP served its Second Set of Requests for Production. The EMT Plaintiffs served their Responses and Objections to USAP's Second Set of Requests for Production on March 23, 2026.

C. Depositions (In Progress)

Between February 23 and March 10, the EMT Plaintiffs served deposition notices for thirteen current employees on USAP and asked if it would accept service of deposition subpoenas on behalf of three former employees. The parties have scheduled 4 depositions. On March 10, the EMT Plaintiffs served two deposition subpoenas on Welsh, Carson, Anderson & Stowe.

On February 26, 2026, USAP served Rule 30(b)(6) deposition notices on the EMT Plaintiffs. On March 12, the EMT Plaintiffs served their Responses and Objections to USAP's Rule 30(b)(6) deposition notices. The parties are meeting and confer to schedule Plaintiffs' 30(b)(6) depositions. On March 20, USAP served deposition notices on two custodians for EMT and three custodians for Plumbers. Also on March 20, EMT served an additional seven deposition notices for current employees and five deposition subpoenas for former employees on USAP.

Dated: March 27, 2026

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that the foregoing was duly served upon all Counsel of record via the Court's CM/ECF system on March 27, 2026.

By: /s/ Brendan P. Glackin