

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF KENTUCKY
LOUISVILLE DIVISION

ESTATE OF JOANNE BARROWS, SUSAN
HAGOOD, SHARON MERKLEY, LORRAINE
KOHL, and DOLLY BALANI, individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

HUMANA INC.,

Defendant.

No. 3:23-cv-00654-RGJ-CHL

JOINT STATUS REPORT

Plaintiffs the Estate of Joanne Barrows, Susan Hagood, Sharon Merkley, Lorraine Kohl, and Dolly Balani (together, “Plaintiffs”) and Defendant Humana Inc. (“Defendant”) (collectively, the “Parties”) respectfully submit the following joint status report pursuant to the Court’s October 10, 2025 Scheduling Order (ECF No. 91). This joint status report reflects case developments since the last joint status report, filed on February 23, 2026 (ECF No. 118).

1. Written Discovery

- a. On March 24, 2026, Plaintiffs served their Second Set of Requests for Production on Defendant. The parties have scheduled a videoconference for April 9, 2026, to meet-and-confer regarding these requests.
- b. On April 3, 2026, Plaintiffs provided Notice of Subpoena duces tecum to be served on naviHealth, Inc., a nonparty to the above-captioned action.
- c. Also on April 3, 2026, Defendant served subpoenas duces tecum on seven nonparties who are family members and/or personal representatives of Plaintiffs

and who were identified in Plaintiffs' Rule 26 disclosures and in discovery responses. Meet-and-confer correspondence regarding Defendant's request for documents in these individuals' possession, control, or custody began in January 2026.

2. Productions

- a. Defendant made its sixth production of documents on March 6, 2026, its seventh production on March 20, 2026, and its eighth production on March 31, 2026. Defendant plans to continue making further productions on a rolling basis.
- b. Plaintiffs made their first production of documents on February 27, 2026. They intend to make at least one further production that will include Plaintiffs' responsive ESI and certain documents in Plaintiffs' family members' and personal representatives' possession, custody, or control.

The Parties currently remain on track to meet the deadlines set forth in the Court's Scheduling Order.

Dated: April 9, 2026

Respectfully submitted,

/s/ Michael A. Boelter (w/ permission)

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