

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF KENTUCKY
LOUISVILLE DIVISION
*ELECTRONICALLY FILED***

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.

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

JOINT NOTICE REGARDING ESI PROTOCOL

In its Scheduling Order [R. 91], this Court directed the parties to “confer and agree on a proposed ESI protocol and file a copy of their agreement in the record” by October 30, 2025.

The parties submit this joint notice to inform the Court that they have been conferring cooperatively and in good faith regarding an ESI protocol and are in agreement concerning the majority of the terms of that agreement. However, further client input is needed to resolve a small number of remaining points of discussion in the ESI protocol. The parties anticipate that they will be able to resolve these final matters within seven days, and intend to file an agreed ESI protocol with the Court no later than November 6, 2025.

To the extent the Court believes a motion is required to formally extend the deadline for submitting an ESI protocol, the parties respectfully request that the Court construe this Notice as a joint motion for an extension of the October 30, 2025 deadline.

Respectfully Submitted,

s/ Michael Boelter (w/ permission)

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Attorneys for Defendant Humana Inc.

CERTIFICATE OF SERVICE

I hereby certify that, on October 30, 2025, a copy of the foregoing was electronically filed with the Clerk of Court using the CM/ECF system, which will automatically send email notification of such filing to all counsel of record.

/s/ Michael P. Abate
Michael P. Abate

Counsel for Defendant Humana Inc.