

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,

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

Plaintiffs,

v.

HUMANA INC.,

Defendant.

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 November 24, 2025 (ECF No. 103).

1. Written Discovery.

a. On December 5, 2025, Plaintiffs served responses and objections to Defendant’s first requests for production, and Plaintiffs the Estate of Barrows, Merkley, Kohl, and Balani each served responses and objections to Defendant’s first interrogatories. The Parties have met and conferred regarding these responses and objections.

b. Plaintiff Hagood is experiencing medical issues; the Parties have agreed to extensions for her responses and objections to Defendant’s interrogatories, which are now due to be served on January 23, 2026.

c. On December 12, 2025, Defendant served its responses and objections to Plaintiffs' first requests for production and interrogatories.

2. Confidentiality Stipulation. On December 30, 2025, the Parties reached agreement on and executed a stipulation governing the protection of confidential information in this case.

3. Productions. Defendant made its first production of documents on December 31, 2025, and a second production on January 7, 2026. Defendant plans to continue making further productions on a rolling basis.

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

Dated: January 8, 2026

Respectfully submitted,

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

Glenn A. Danas (*pro hac vice*)
Ryan J. Clarkson (*pro hac vice*)
Zarrina Ozari (*pro hac vice*)
Michael A. Boelter (*pro hac vice*)
CLARKSON LAW FIRM, P.C.
22525 Pacific Coast Highway
Malibu, CA 90265
Telephone: 213-788-4050
rclarkson@clarksonlawfirm.com
gdanas@clarksonlawfirm.com
zozari@clarksonlawfirm.com
mboelter@clarksonlawfirm.com

David W. Asp (*pro hac vice*)
Derek C. Waller (*pro hac vice*)
Emma Ritter Gordon (*pro hac vice*)
LOCKRIDGE GRINDAL NAUEN PLLP
100 Washington Ave. South, Ste. 2200
Minneapolis, MN 55401
Tel: (612) 339-6900
dwasp@locklaw.com
dcwaller@locklaw.com
erittergordon@locklaw.com

/s/ Kevin D. Feder

Kevin D. Feder (*pro hac vice*)
Samuel R. Lehman (*pro hac vice*)
Jason Yan (*pro hac vice*)
Gillian Mak (*pro hac vice*)
O'MELVENY & MYERS LLP
1625 Eye Street NW
Washington, DC 20006
Telephone: 202-383-5164
kfeder@omm.com
jyan@omm.com
gmak@omm.com

Michael P. Abate
Burt Anthony Stinson
KAPLAN JOHNSON ABATE &
BIRD LLP
710 West Main Street, 4th Floor
Louisville, KY 40202
Telephone: 502-416-1630
mabate@kaplanjohnsonlaw.com
estinson@kaplanjohnsonlaw.com

Attorneys for Defendant Humana Inc.

James Guilfoyle
GUILFOYLE LAW OFFICE
229 West Spring Street
New Albany, IN 47150
Telephone: (812) 208-9704
jfg@inkylegal.com

John C Whitfield, Esq.
WHITFIELD CROSBY & FLYNN PLLC
19 North Main Street
Madisonville, KY 42431
Telephone: (270) 821-0656
JWhitfield@wcfjustice.com

Attorneys for Plaintiffs