

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 January 8, 2026 (ECF No. 105).

1. Written Discovery

- a. Pursuant to the Parties’ agreement to an extension on the basis of medical issues she is experiencing, on January 23, 2026, Plaintiff Hagood served her responses and objections to Defendant’s interrogatories.
- b. The Parties continue to have productive correspondence regarding several issues raised in Plaintiffs’ responses to Defendant’s requests for production and interrogatories and during a subsequent December 11, 2025 meet and confer videoconference. Most recently, in a February 4, 2026 letter, Plaintiffs’ counsel

agreed to contact the family members and/or representatives identified in Plaintiffs' disclosures and discovery responses in an effort to collect responsive documents. Plaintiffs' counsel said they will advise Defendant's counsel if any family member or representative is unwilling to work with Plaintiffs' counsel to search and gather responsive documents, so that Defendant has time to issue non-party subpoenas, if necessary, without impacting the schedule set forth in the Court's scheduling order.

2. Productions

- a. Defendant made its third production of documents on January 23, 2026, fourth production on February 6, 2026, and fifth production on February 20, 2026. Defendant plans to continue making further productions on a rolling basis.
- b. Plaintiffs expect their first production of documents will be made within the upcoming week, or shortly thereafter.

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

Dated: February 23, 2026

Respectfully submitted,

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

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