

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT**

ESTUARY TRANSIT DISTRICT AND
TEAMSTERS 671 HEALTH SERVICE &
INSURANCE PLAN, on behalf of themselves
and all others similarly situated,

Plaintiffs,

v.

HARTFORD HEALTHCARE CORPORATION,
HARTFORD HOSPITAL, HARTFORD
HEALTHCARE MEDICAL GROUP, INC.,
INTEGRATED CARE PARTNERS, LLC,

Defendants.

Case No.: 3:24-cv-01051 (SFR)

PLAINTIFFS' MOTION TO COMPEL PRODUCTION OF 182 DOCUMENTS

Pursuant to Rules 26(b) and 37(a) of the Federal Rules of Civil Procedure and Local Civil Rules 7 and 37, Plaintiffs Estuary Transit District and Teamsters 671 Health Service & Insurance Plan (collectively, "Plaintiffs") respectfully move, pursuant to Federal Rule of Civil Procedure 37(a), for an order compelling Defendants Hartford HealthCare Corporation, Hartford Hospital, Hartford HealthCare Medical Group, Inc., and Integrated Care Partners, LLC (collectively, "HHC" or "Defendants") to produce 182 documents that Defendants have withheld on the basis of attorney-client privilege.

As set forth in the accompanying memorandum of law and supporting declaration, Plaintiffs have spent the last year attempting to resolve the issues regarding the adequacy of Defendants' privilege log and disputes as to specific documents/categories of documents that Plaintiffs believe were erroneously withheld as privileged. Each time, as a result of Plaintiffs' urging Defendants to review or re-view documents, Defendants have released tranches of

documents—all while claiming no systematic issues with its privilege review. Based on the record in this case, and Defendants’ failure to establish the privilege elements for the 182 documents, Plaintiffs move to compel their production. In the alternative, Plaintiffs respectfully request that the Court conduct an *in camera* review of the 182 documents, or a subset thereof, and order production of all non-privileged content..

ORAL ARGUMENT REQUESTED

April 24, 2026

Respectfully submitted,

/s/ Mario K. Cerame

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Plan and the Proposed Class*

CERTIFICATE OF SERVICE

I hereby certify that on this day, a copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by email to all parties by operation of the Court's electronic filing system or by mail on anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

Dated this 24th day of April 2026.

/s/ Mario K. Cerame
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