

**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 FOR LEAVE TO FILE DOCUMENTS UNDER SEAL

Plaintiffs Estuary Transit District and Teamsters 671 Health Service & Insurance Plan (collectively, "Plaintiffs"), through their undersigned counsel, respectfully move pursuant to Civil Local Rule 5(e) and Paragraph 14 of the Stipulation and Protective Order ("Protective Order") (Dkt. 80) for leave to file under seal certain documents submitted in connection with Plaintiffs' contemporaneously filed Motion to Compel Production of 182 Documents and the accompanying Memorandum of Law ("Memorandum"). Specifically, Plaintiffs seek leave to file under seal: (1) Exhibits 33 and 34 to the Motion to Compel; and (2) the portions of the Memorandum that quote from or describe the contents of Exhibits 33 and 34

Exhibits 33 and 34 were produced by Defendants in discovery and bear the designation "CONFIDENTIAL – ATTORNEYS' EYES ONLY" pursuant to Paragraph 11 of the Protective Order. Dkt. 80 ¶¶ 11, 14. Paragraph 14 of the Protective Order provides that "[a] Party that seeks to file under seal any Designated Material must comply with Civil Local Rule

5(e)” and that “[d]esignated Material may be filed under seal only pursuant to a Court order authorizing the sealing of the specific Designated Material at issue.” *Id.* ¶ 14. Plaintiffs file this motion to comply with those requirements.

Plaintiffs recognize that Local Rule 5(e)(3) requires “particularized findings that sealing is supported by clear and compelling reasons and is narrowly tailored to serve those reasons,” and that “[a] confidentiality order or protective order entered by the Court to govern discovery shall not qualify as an order to seal documents for purposes of this rule.” D. Conn. L. Civ. R. 5(e)(3); *see CSL Silicones, Inc. v. Midsun Grp. Inc.*, No. 3:14-CV-1897, 2017 WL 4750701, at *1–2 (D. Conn. July 12, 2017). The confidentiality designation at issue was made by Defendants, not Plaintiffs. Plaintiffs take no position on whether the Document warrants sealing under the standard set forth in Local Rule 5(e)(3) and respectfully submit that any particularized showing of clear and compelling reasons supporting the seal is properly made by Defendants, as the designating party. Defendants may supplement or respond to this motion with any justification they wish to provide in support of maintaining the confidentiality of their own designated material.

Plaintiffs have simultaneously filed on the public docket redacted versions of the Memorandum that omit quotations from and specific descriptions of the contents of Exhibits 33 and 34. Should the Court decline to seal the material, or should Defendants not provide the requisite justification under Local Rule 5(e)(3), Plaintiffs will promptly refile unredacted versions of all affected filings on the public docket.

April 24, 2026

Respectfully submitted,

/s/ Mario Cerame

Mario Cerame (ct30125)
AETON LAW PARTNERS LLP
311 Centerpoint Drive
Middletown, Connecticut 06475
Telephone: (860) 724-2160
mario@aetonlaw.com

Michael B. Eisenkraft (*pro hac vice*)
Christopher J. Bateman (*pro hac vice*)
Silvie Saltzman (*pro hac vice*)
**COHEN MILSTEIN SELLERS & TOLL
PLLC**
88 Pine Street, Suite 1400
New York, NY 10005
Telephone: (212) 838-7797
Facsimile: (212) 838-7745
meisenkraft@cohenmilstein.com
cbateman@cohenmilstein.com
ssaltzman@cohenmilstein.com

Brent W. Johnson (*pro hac vice*)
Nathaniel D. Regenold (*pro hac vice*)
**COHEN MILSTEIN SELLERS & TOLL
PLLC**
1100 New York Ave. NW, Eighth Floor
Washington, DC 20005
Telephone: (202) 408-4600
Facsimile: (202) 408-4699
bjohnson@cohenmilstein.com
nregenold@cohenmilstein.com

Douglas A. Millen (*pro hac vice*)
Michael E. Moskovitz (*pro hac vice*)
Robert J. Wozniak (*pro hac vice*)
Matthew W. Ruan (*pro hac vice*)
Samantha M. Gupta (*pro hac vice*)
**JUSTICE JAGHER LONDON & MILLEN
LLC**
100 Tri-State International, Suite 128
Lincolnshire, IL 60069
Telephone: (224) 632-4500
dmillen@jjlmlaw.com
mmoskovitz@jjlmlaw.com

rwozniak@jjlmlaw.com
mruan@jjlmlaw.com
sgupta@jjlmlaw.com

Daniel J. Walker (*pro hac vice*)
BERGER MONTAGUE PC
1001 G Street, NW Suite 400 East
Washington, DC 20001
Telephone: (202) 559-9745
dwalker@bm.net

Eric L. Cramer (*pro hac vice*)
Caitlin Coslett (*pro hac vice*)
Laurel Boman (*pro hac vice*)
BERGER MONTAGUE PC
1818 Market Street, Suite 3600
Philadelphia, PA 19103
Telephone: (215) 875-3000
ecramer@bm.net
lboman@bm.net

Frank R. Schirripa (*pro hac vice*)
Scott Jacobsen (*pro hac vice*)
**HACH ROSE SCHIRRIPA & CHEVERIE
LLP**
112 Madison Avenue, 10th Floor
New York, NY 10016
Telephone: (212) 213-8311
fschirripa@hrsclaw.com
sjacobsen@hrsclaw.com

*Attorneys for Plaintiffs Estuary Transit District
and Teamsters 671 Health Service & Insurance
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 Cerame

Mario Cerame (ct30125)