

**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)

JANUARY 30, 2025

PARTIES' JOINT STATUS REPORT

Pursuant to the Court's November 1, 2024 Order, Plaintiffs ("Direct Purchaser Plaintiffs" or "DPPs") and Defendants ("Hartford HealthCare") (collectively, the "Parties") respectfully submit this Joint Status Report to describe "what discovery has been done and [to] advis[e] the Court of any anticipated problems." ECF No. 91.

A. Status of the Case

1. Status of Discovery

The Parties continue to work diligently to complete discovery within the time limits prescribed by the Court. *See* ECF No. 90 (setting April 30, 2025 deadline for substantial completion and October 26, 2025 cutoff for fact discovery). Plaintiffs continue to review over one million documents Hartford HealthCare produced in response to Plaintiffs' first set of document requests.

Since the Parties' December 2, 2024 Joint Status Report, ECF No. 92, the Parties each served additional discovery requests. On December 11, 2024, Hartford HealthCare served its first set of 75 document requests on Plaintiffs, to which Plaintiffs timely responded and objected on January 10, 2025. On December 18, 2024, Plaintiffs served their second set of four document requests on HHC, to which HHC timely responded and objected on January 17, 2025. The Parties are meeting and conferring regarding the scope of those requests. In addition, Plaintiffs served their first set of four interrogatories on December 31, 2024 and their third set of three document requests on January 8, 2025, to which HHC plans to timely respond and object.

With respect to ongoing negotiations raised in the Parties' previous Joint Status Report, *see* ECF No. 92 at 2, the Parties reached agreement on December 10, 2024 regarding additional search terms and custodians to be used by Hartford HealthCare in certain supplemental productions to DPPs. The Parties continue to negotiate the relevant time period for DPPs' discovery requests, due in part to ongoing discussions between the Indirect Purchaser Plaintiffs and Hartford HealthCare in the related state action. *See John Brown, et al. v. Hartford Healthcare Corporation*, Conn. Super. Ct., Docket No. HHD-CV22-6152239-S.

DPPs recently served third-party subpoenas on 13 provider groups that operate within Connecticut, seeking documents related to, among other things, any purported affiliations those groups may have with Defendant Integrated Care Partners, LLC, and are waiting for those entities to respond. DPPs also recently served a third-party subpoena to a large health care services provider that competes with Hartford HealthCare in Connecticut and on a Massachusetts-based health insurer.

2. Pending Motions

There are currently no pending motions in this action.

Respectfully Submitted,

/s/ Jonathan M. Shapiro

Jonathan M. Shapiro (ct24075)
AETON LAW PARTNERS LLP
311 Centerpoint Drive
Middletown, Connecticut 06475
Telephone: (860) 724-2160
jms@aetonlaw.com

Matthew W. Ruan
Douglas A. Millen
Robert J. Wozniak
Michael E. Moskovitz
FREED KANNER LONDON & MILLEN
LLC
100 Tri-State International, Suite 128
Lincolnshire, IL 60069
Telephone: (224) 632-4500
mruan@fklmlaw.com
dmillen@fklmlaw.com

Michael B. Eisenkraft
Christopher J. Bateman
Silvie R. Saltzman
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
Nathaniel D. Regenold
COHEN MILSTEIN SELLERS & TOLL
PLLC
1100 New York Ave. NW, Eighth Floor
Washington, DC 20005
Telephone: (202) 408-4600
Facsimile: (202) 408-4699

/s/ Patrick M. Fahey

Patrick M. Fahey (ct13862)
Karen T. Staib (ct21119)
SHIPMAN & GOODWIN LLP
One Constitution Plaza
Hartford, CT 06103
Tel.: 860-251-5000
Fax: 860-251-5219
Email: pfahey@goodwin.com
Email: kstaib@goodwin.com

Stephen Weissman
Jamie E. France
GIBSON, DUNN & CRUTCHER LLP
1050 Connecticut Avenue, N.W.
Washington, DC 20036-5306
(202) 955-8690
sweissman@gibsondunn.com
jfrance@gibsondunn.com

Erick J. Stock
Joshua J. Obear
GIBSON, DUNN & CRUTCHER LLP
200 Park Avenue
New York, NY 10166-0193
(212)351-4000
estock@gibsondunn.com
jobear@gibsondunn.com

Thomas J. Dillickrath
Leo D. Caseria
Joseph Antel
Rachel Guy
SHEPPARD MULLIN RICHTER &
HAMPTON LLP
2099 Pennsylvania Avenue, N.W.
Washington, DC 20006-6801
(202) 747-1900
tdillickrath@sheppardmullin.com
lcaseria@sheppardmullin.com

bjohnson@cohenmilstein.com
nregenold@cohenmilstein.com

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

Eric L. Cramer
BERGER MONTAGUE PC
1818 Market Street, Suite 3600
Philadelphia, PA 19103
Telephone: (215) 875-3000
ecramer@bm.net

Frank R. Schirripa
Scott Jacobsen
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*

jantel@sheppardmullin.com
rguy@sheppardmullin.com

Joy O. Siu
SHEPPARD MULLIN RICHTER &
HAMPTON LLP
4 Embarcadero Center, 17th Floor
San Francisco, CA 94111-4158
(415) 774-3108
jsiu@sheppardmullin.com

*Attorneys for Defendants Hartford Healthcare
Corporation, Hartford Hospital, Hartford
HealthCare Medical Group, Inc., and
Integrated Care Partners, LLC*