

**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)

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 for requests for production served on or before October 16, 2024, and October 26, 2025 cutoff for fact discovery). Plaintiffs continue to review the over one million documents Hartford HealthCare produced in response to Plaintiffs' first set of document requests. The Parties continue to meet and confer regarding HHC's first set of document requests to Plaintiffs, to which

Plaintiffs timely responded and objected on January 10, 2025; Plaintiffs' second set of document requests, to which HHC timely responded and objected on January 17, 2025; and Plaintiffs' first set of interrogatories, to which HHC timely responded and objected on January 30, 2025. HHC provided Plaintiffs with a list of three proposed custodians, as well as search terms, for Plaintiff Estuary Transit on February 24, 2025. HHC provided DPPs with a list of five proposed custodians and search terms for Plaintiff Teamsters 671 on February 24, 2025, and changed one of those custodians to another individual on March 24, 2025. HHC is currently awaiting reports from Plaintiffs on the number of documents hit by these searches.

The Parties also reached impasse on Plaintiffs' third set of document requests, to which HHC timely responded and objected on February 7, 2025. Accordingly, Plaintiffs filed a motion to compel on March 3, 2025. *See infra*. Since the Parties' January 30, 2025 Joint Status Report, ECF No. 96, HHC served its first set of interrogatories on March 3, 2025, to which Plaintiffs plan to timely respond and object by April 2, 2025. The Parties also reached agreement on the relevant time period for DPPs' discovery requests.

DPPs continue to meet and confer with the 13 provider groups they subpoenaed seeking documents related to, among other things, any purported affiliations those groups may have with Defendant Integrated Care Partners, LLC. DPPs also continue to meet and confer with a large health care services provider that competes with Hartford HealthCare in Connecticut and with several health insurers. HHC served their own third-party subpoenas on several health insurers.

On February 14, 2025, Plaintiffs, alongside indirect purchaser plaintiffs in *Brown v. Hartford HealthCare Corp.*, No. X03-HHD-CV22-6152239-S (Conn. Super. Ct. filed Feb. 14, 2022), filed a Motion to Intervene in *Saint Francis Hospital & Medical Center v. Hartford HealthCare Corporation*, No. 3:22-cv-00050 (SVN) (D. Conn.) (the "*Saint Francis*" case),

another case Defendants settled on January 3, 2025. The Motion requested a temporary stay of a provision in the *Saint Francis* Protective Order that provides for the return and/or destruction of relevant discovery material that Plaintiffs requested in this case. *Saint Francis*, ECF No. 307. HHC took no position on Plaintiffs' motion. *Saint Francis* ECF No. 309. The court granted Plaintiffs' motion on March 7, 2025 and suspended the relevant requirements of the *Saint Francis* Protective Order until June 5, 2025.

2. Pending Motions

As noted above, on March 3, 2025, Plaintiffs filed a motion to compel production of certain documents responsive to their third set of document requests related to the recent *Saint Francis* settlement. The Court referred Plaintiffs' motion to Magistrate Judge Thomas O. Farrish on March 14, 2025. HHC opposed Plaintiffs' motion on March 24, 2025, and Plaintiffs plan to timely reply by April 7, 2025.

Respectfully Submitted,

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