

**UNITED STATES DISTRICT COURT
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 ("DPPs" or "Plaintiffs") and Defendants ("HHC") (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 October 26, 2025 cutoff for fact discovery). Since the last joint status report, *see* ECF No. 118, DPPs completed their final anticipated productions of custodial documents in response to HHC's first set of document requests on September 23, 2025. HHC is diligently reviewing these new productions, which total 335,394 pages, to evaluate whether they satisfy HHC's document requests. The Parties are also meeting and conferring

regarding DPPs' fifth set of document requests, to which HHC timely responded and objected on September 22, 2025; DPPs' fourth set of document requests, to which HHC timely responded and objected on July 2, 2025; HHC's second set of interrogatories, to which DPPs timely responded and objected on July 16, 2025; and certain of HHC's other discovery requests to DPPs. DPPs also requested that HHC supplement its responses to DPPs' first set of interrogatories now that HHC has substantially completed its document productions responsive to DPPs' first set of document requests, and HHC has also requested that DPPs supplement their interrogatory responses.

DPPs continue to meet and confer with numerous of the 13 provider groups subpoenaed in December 2024 and January 2025, and of the additional six provider groups subpoenaed on April 29, 2025. Those subpoenas seek documents related to, among other things, whether and/or the extent to which the provider groups are affiliated with Defendant Integrated Care Partners, LLC. DPPs have received responsive documents from most of these providers and are continuing to negotiate custodial and non-custodial productions with the outstanding non-party provider groups. In addition, as explained further below, DPPs have served deposition notices on several of these entities.

The Parties are also continuing their months' long negotiations with several large health insurers that were served with document subpoenas. Since the commencement of DPPs' and HHC's negotiations with seven such health insurers—subpoenaed in November 2024 and January 2025 for claims data and documents related to, among other things, their respective negotiations and ongoing relationships with HHC—only two have made complete claims data productions that DPPs consider adequately responsive to their requests. Another two have produced claims data samples while three have yet to produce any claims data. Additionally, DPPs and HHC are actively negotiating the scope of custodial and/or non-custodial document productions from several of

these entities. Only four of these entities have produced any documents so far, with no health insurers representing that they have substantially completed their document productions. It is DPPs' position that the claims data from health insurers will likely be important inputs for economic analyses by their experts and that the custodial and/non-custodial document productions from these entities are necessary for DPPs to evaluate the impacts of HHC's alleged anticompetitive activity over time and to understand how direct purchasers understood the structure of the markets. DPPs therefore consider this non-party discovery critical to their ability to prosecute their claims in this action, including deposing key personnel at HHC as well as personnel from these third-party health insurers. The Parties will continue to work diligently to secure complete productions from each of these entities and will make every effort to resolve outstanding issues without the need for Court intervention. As such, as explained in more detail below, the Parties imminently expect to file a joint request to amend the case schedule in this case. *See infra* Section A.2.

Earlier this month, the Connecticut Office of Health Strategy ("OHS"), which maintains Connecticut's All-Payer Claims Database, produced publicly maintained claims data that the Parties intend to use for their respective experts' analyses. DPPs continue to meet and confer with OHS regarding outstanding deficiencies in that produced data.

Finally, since the last joint status report was filed, party and non-party depositions have continued. DPPs have taken the depositions of six current or former HHC employees and two physician practices that are quality affiliates of ICP. DPPs have also noticed 10 additional party witnesses and 10 additional non-party depositions and intend to serve additional deposition notices, including of the major health insurers after data and documents have been produced. HHC

has noticed the depositions of witnesses from Plaintiffs Estuary Transit District and Teamsters 671 Health Service & Insurance Plan.

2. Pending Motions

The Parties imminently expect to file a joint motion to amend the case schedule to accommodate discovery needs, particularly to accommodate timing constraints faced by the non-party health insurers and additional time to conduct depositions of both the Parties and non-parties. After extensive negotiations, the Parties reached agreement on a mutually agreeable extension of the case schedule, subject to the Court's approval, and appreciate the Court's consideration of this motion.

Dated: September 29, 2025

Respectfully Submitted,

/s/ Jonathan M. Shapiro

/s/ Patrick M. Fahey

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