

**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)

JOINT MOTION TO AMEND SCHEDULING ORDER

Pursuant to Rule 16(b)(4) of the Federal Rules of Civil Procedure and Local Civil Rule 16(b), Plaintiffs Estuary Transit District and Teamsters 671 Health Service & Insurance Plan (collectively, “Plaintiffs”) and Defendants Hartford HealthCare Corporation, Hartford Hospital, Hartford HealthCare Medical Group, Inc., and Integrated Care Partners, LLC (collectively, “HHC,” and together with Plaintiffs, the “Parties”) respectfully move for the Court to amend the operative case management schedule as set forth in the table below.¹ In support of their motion, the Parties state as follows:

¹ Plaintiffs in *Brown et al. v. Hartford HealthCare Corp.*, No. X03-CV22-6152239-S (Conn. Super. Ct. Hartford) (the “*Brown* litigation”), and Defendants have agreed to similarly modify the case schedule in that matter in order to ensure that both matters continue to remain aligned.

1. The current scheduling order is dated November 1, 2024. *See* ECF Nos. 90, 91. Fact discovery is currently scheduled to close on October 26, 2025. *See id.* This is the first motion to amend the scheduling order filed in this litigation.

2. The Parties have been working diligently to complete discovery within the time limits prescribed by the operative scheduling order. HHC has substantially completed its document production responsive to Plaintiffs' document requests. Plaintiffs completed what they expect to be their final production of approximately 336,000 pages of documents to HHC on September 23, 2025, and HHC is currently reviewing them to evaluate whether they fully satisfy HHC's document requests.

3. Plaintiffs have completed their depositions of six current or former HHC employees and have noticed depositions of 10 additional HHC witnesses to proceed over the coming months. HHC has noticed depositions of six witnesses of Estuary Transit District or Teamsters 671 Health Service & Insurance Plan.

4. Additionally, the Parties each have served numerous non-party subpoenas for documents, and Plaintiffs have served 12 non-party deposition subpoenas. Although many non-parties have produced responsive documents and data and there have been two non-party depositions completed to date, several important non-parties have not yet begun their document productions.

5. Most importantly, the Parties each have served subpoenas for data and documents on six major insurance companies operating in Connecticut (together, the "Payors"): Aetna, Cigna, Elevance Health (f/k/a Anthem), Point32Health,² ConnectiCare, and UnitedHealthcare. Plaintiffs

² In 2023, Point32Health exited the Connecticut commercial health insurance market. *See* Hartford Business, *Harvard Pilgrim Exiting CT's Commercial Health Insurance Market* (Apr. 19,

contend that the Payors' subpoenaed documents and data are highly relevant to this litigation on issues including class certification, injury, and damages. Topics covered by Plaintiffs' subpoenas to these entities include: (1) documents concerning contract negotiations between the Payors and HHC; (2) documents reflecting network adequacy considerations when assembling health networks; (3) analyses about the prices of healthcare services in Connecticut; (4) healthcare market analyses; (5) documents produced in the *St. Francis Hosp. & Med. Ctr. v. Hartford Healthcare Corp.*, litigation (No. 22-cv-00050 (D. Conn.)); and (6) structured data for medical claims.

6. Plaintiffs in both this case and the *Brown* litigation state that they have jointly undertaken significant effort to negotiate each Payor's subpoena over the course of many months, taking part in near-weekly correspondence and meet and confers since late 2024. Plaintiffs state that they have worked diligently and cooperatively with these crucial non-parties to explain the relevance of these subpoenaed materials and to reduce the burden associated with producing documents and data wherever practicable. Plaintiffs further state that, likewise, the Payors have been working in good faith to complete their productions and to allow depositions of these non-parties to proceed expeditiously. HHC does not have direct knowledge of Plaintiffs' claims set forth above but join in this motion given that, among other things, the Payors have requested additional time to complete their productions.

7. Despite the Parties' and the Payors' best efforts, non-party discovery related to the Payors is not yet close to complete. Specifically, negotiation regarding the production of structured data has resulted in significant effort and months of coordination, and only two Payors have produced complete structured data thus far. In addition, the Parties and Payors also have been

2022), <https://hartfordbusiness.com/article/harvard-pilgrim-exiting-cts-commercial-health-insurance-market/>.

diligently negotiating the scope of document production, but only four Payors have produced any documents so far, with no Payors representing that they have substantially completed their document productions. Plaintiffs state that at least two Payors have confirmed to Plaintiffs that they will be unable to produce data and documents before early 2026 due to logistical burdens.

8. Plaintiffs maintain that several HHC depositions cannot proceed until this non-party discovery is obtained because documents related to HHC-Payor negotiations will be key to those depositions. Plaintiffs also intend to depose these non-party Payors and contend that they cannot take those depositions until document and data productions are complete.

9. Additionally, HHC has requested that depositions of the named Plaintiffs occur later than the current schedule allows because Plaintiffs only last week substantially completed their document productions.

10. For these reasons, the current case schedule cannot reasonably be met despite the parties' diligence, and there is good cause to modify the schedule. Given the need for additional time to complete important non-party discovery, the Parties also have agreed to extend the deadline for certain party and party-affiliated discovery so that, among other things, depositions can be conducted when both party and non-party document discovery has been completed.

11. The Parties respectfully propose the following schedule:

Event	Original Deadline (<i>see</i> ECF No. 91)	Proposed Deadline
Party-Affiliated Discovery Cutoff (<i>excepting depositions of select ICP-affiliated physician practices and Plaintiff depositions</i>) ³	10/26/2025	10/26/2025

³ In addition, Plaintiffs and HHC may each take three party-affiliated depositions between January 16, 2026, and March 20, 2026, the identity of whom must be agreed to by the Parties.

Event	Original Deadline (<i>see</i> ECF No. 91)	Proposed Deadline
Deadline for Depositions of Eight Additional ICP-affiliated physician practices and Plaintiff Depositions ⁴	N/A	12/17/2025
Non-Party Deadline to Produce All Data	N/A	1/16/2025
All Remaining Fact Discovery Cutoff	N/A	3/20/2026
Plaintiffs' Opening Class Expert Reports	12/1/2025	5/1/2026
Defendants' Opposing Class Expert Reports	2/4/2026	7/10/2026
Plaintiffs' Rebuttal Class Expert Reports	3/20/2026	8/21/2026
Completion of Expert Depositions	5/1/2026	10/2/2026
Deadline to File <i>Daubert</i> Motions Related to Class Certification	6/3/2026	10/30/2026
Deadline to File Motion to Certify Class	6/10/2026	11/06/2026
Deadline to File Opposition to <i>Daubert</i> Motions Related to Class Certification	7/15/2026	1/13/2027
Deadline to File Opposition to Motion to Certify Class	7/22/2026	1/20/2027
Deadline to File Reply in Support of <i>Daubert</i> Motion	8/12/2026	2/26/2027
Deadline to File Reply in Support of Motion to Certify Class	8/19/2026	3/5/2027
Parties to Inform the Court of Whether a Settlement Conference Is Requested	9/2/2026	3/19/2027
Hearing on Motion for Class Certification	To be determined by the Court	To be determined by the Court

⁴ The identity of the eight ICP-affiliated physician practices whose depositions may take place between October 26, 2025, and December 17, 2025, must be agreed to by the parties. In addition, on an ad hoc basis, when justified for the convenience of a particular witness, and with the consent of all parties, a deposition may be scheduled for a date that is later than the dates provided herein, provided that it does not interfere with the other dates in the schedule.

Event	Original Deadline (<i>see</i> ECF No. 91)	Proposed Deadline
Exchange of Proposed Schedules for Merits Expert Reports, Summary Judgment, and Trial	One week after the Court's decisions on Motion to Certify Class and related <i>Daubert</i> Motions	Ten days after the Court's decisions on Motion to Certify Class and related <i>Daubert</i> Motions
Status Conference to Determine Remainder of Schedule	Two weeks after the Court's decisions on Motion to Certify Class and Related <i>Daubert</i> Motions	Three weeks after the Court's decisions on Motion to Certify Class and Related <i>Daubert</i> Motions

Dated: September 30, 2025

Respectfully Submitted,

/s/ Jonathan M. Shapiro/s/ Patrick M. Fahey

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**[PROPOSED] ORDER GRANTING JOINT MOTION TO AMEND
SCHEDULING ORDER**

Before the Court is the Parties' Joint Motion to Amend Scheduling Order. Based upon the filings and proceedings herein, and finding good cause under Rule 16 of the Federal Rules of Civil Procedure and Local Civil Rule 16(b), it is hereby **ORDERED** that:

The following amended scheduling order shall govern.

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IT IS SO ORDERED.

DATED: _____

Honorable Sarah F. Russell
United States District Judge