

**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); *see also* ECF No. 126 (order granting joint motion to amend the scheduling order and setting March 20, 2026 as cutoff for specified non-party fact discovery). The Parties are also meeting and conferring regarding DPPs' third set of interrogatories and first set of requests for admission, to

which HHC timely responded and objected on October 26, 2025. The Parties are also meeting and conferring regarding the 30(b)(6) Notices served by DPPs and by HHC.

DPPs have received responsive documents from most of the provider groups upon which they served document subpoenas and are continuing to negotiate custodial and non-custodial productions with the outstanding non-party provider groups.

The Parties are also continuing their months' long negotiations with several large health insurers that were served with document subpoenas covering both claims data and custodial documents. As of the date of this joint status report, all of the health insurers that were subpoenaed have made claims data productions that DPPs are analyzing. Four of the six major insurers operating in Connecticut have made document productions responsive to DPPs' requests, and two insurers are finalizing search term negotiations. For the four insurers who have made document productions, DPPs are evaluating whether these productions satisfy their document requests. 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.

Both party and non-party depositions have continued since the last joint status report was filed. DPPs have taken the depositions of 11 current or former HHC employees and six physician practices that are current/former members or quality affiliates of Defendant ICP, have scheduled the depositions of four other witnesses in the coming months, and have noticed seven additional depositions that have yet to be scheduled. DPPs intend to serve the major health insurers with deposition notices 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. And, as described above, both Plaintiffs and Defendants have served 30(b)(6) Notices.

2. Pending Motions

There are no pending motions at this time.

Dated: November 26, 2025

Respectfully Submitted,

/s/ Jonathan M. Shapiro

/s/ Patrick M. Fahey

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