

**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)

**PLAINTIFFS' MOTION FOR LEAVE TO FILE
DOCUMENTS UNDER SEAL**

Plaintiffs Estuary Transit District and Teamsters 671 Health Service & Insurance Plan (collectively, “Plaintiffs”), through their undersigned counsel, respectfully move pursuant to Civil Local Rule 5(e) and Paragraph 14 of the Stipulation and Protective Order (“Protective Order”) (Dkt. 80) for leave to file under seal certain documents submitted in connection with Plaintiffs’ contemporaneously filed Motion to Compel Unredacted Production of Document HHC-BROWN-01851472 and the accompanying Memorandum of Law (“Memorandum”).

Specifically, Plaintiffs seek leave to file under seal: (1) Exhibit 4 to the Declaration of Samantha M. Gupta, which is the redacted version of Document HHC-BROWN-01851472-476, a five-page email chain among employees of Defendants’ subsidiary Integrated Care Partners, LLC; and (2) the portions of the Memorandum that quote from or describe the specific contents of that Document.

The Document was produced by Defendants in discovery and bears the designation “CONFIDENTIAL – ATTORNEYS’ EYES ONLY” pursuant to Paragraph 11 of the Protective Order. Dkt. 80 ¶¶ 11, 14. Paragraph 14 of the Protective Order provides that “[a] Party that seeks to file under seal any Designated Material must comply with Civil Local Rule 5(e)” and that “[d]esignated Material may be filed under seal only pursuant to a Court order authorizing the sealing of the specific Designated Material at issue.” *Id.* ¶ 14. Plaintiffs file this motion to comply with those requirements.

Plaintiffs recognize that Local Rule 5(e)(3) requires “particularized findings that sealing is supported by clear and compelling reasons and is narrowly tailored to serve those reasons,” and that “[a] confidentiality order or protective order entered by the Court to govern discovery shall not qualify as an order to seal documents for purposes of this rule.” D. Conn. L. Civ. R. 5(e)(3); *see CSL Silicones, Inc. v. Midsun Grp. Inc.*, No. 3:14-CV-1897, 2017 WL 4750701, at *1–2 (D. Conn. July 12, 2017). The confidentiality designation at issue was made by Defendants, not Plaintiffs. Plaintiffs take no position on whether the Document warrants sealing under the standard set forth in Local Rule 5(e)(3), and respectfully submit that any particularized showing of clear and compelling reasons supporting the seal is properly made by Defendants, as the designating party. Defendants may supplement or respond to this motion with any justification they wish to provide in support of maintaining the confidentiality of their own designated material.

Plaintiffs have simultaneously filed on the public docket redacted versions of the Memorandum that omit quotations from and specific descriptions of the contents of the Document. Should the Court decline to seal the material, or should Defendants not provide the requisite justification under Local Rule 5(e)(3), Plaintiffs will promptly refile unredacted versions of all affected filings on the public docket.

Dated: February 13, 2026

Respectfully submitted,

/s/ Jonathan M. Shapiro

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CERTIFICATE OF SERVICE

I hereby certify that on this day, a copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by email to all parties by operation of the Court's electronic filing system or by mail on anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

Dated this 13th day of February, 2026.

/s/ Jonathan M. Shapiro

Jonathan M. Shapiro (ct24075)