

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.<sup>1</sup> In support of their motion, the Parties state as follows:

1. The current scheduling order is dated October 1, 2025. *See* ECF No. 126. Pursuant to that Order, fact discovery closed on March 20, 2026.

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<sup>1</sup> Plaintiffs in the *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.

2. The Parties worked diligently to complete discovery by the so-ordered date, conducting 30 party and non-party depositions. However, due to scheduling constraints and despite the parties' and non-parties' best efforts, a handful of depositions of some of the largest commercial health plans operating in Connecticut (collectively, the "Payors") are scheduled to occur—with all parties' consent and to avoid burdening the Court—outside the fact discovery cutoff. For example, the deposition of Aetna is scheduled for April 9, 2026; the deposition of UnitedHealthcare is scheduled for April 10, 2026; and the deposition of Cigna is scheduled for April 14, 2026. These depositions will provide testimony regarding contract negotiations between the Payors and HHC, network adequacy considerations, pricing and market share analyses, and the claims data produced by these Payors.

3. Plaintiffs maintain that this forthcoming testimony will be a key input into the Parties' expert reports. Under the current schedule, Plaintiffs' Opening Class Expert Reports are due on May 1, 2026, just two weeks after the Cigna deposition. Plaintiffs seek additional time to adequately consider and account for this forthcoming testimony in light of all other discovery obtained in this case. For this reason, the Parties believe that there is good cause to modify the schedule.

4. The Parties respectfully propose the following schedule, which extends the deadline for Opening Class Expert Reports by 19 days and provides for a commensurate 19-day extension to all remaining deadlines:

<b>Event</b>	<b>Operative Deadline (see ECF No. 126)</b>	<b>Proposed Deadline</b>
Plaintiffs' Opening Class Expert Reports	5/1/2026	5/20/2026
Defendants' Opposing Class Expert Reports	7/10/2026	8/4/2026

<b>Event</b>	<b>Operative Deadline (see ECF No. 126)</b>	<b>Proposed Deadline</b>
Plaintiffs' Rebuttal Class Expert Reports	8/21/2026	9/15/2026
Completion of Expert Depositions	10/2/2026	10/23/2026
Deadline to File <i>Daubert</i> Motions Related to Class Certification	10/30/2026	11/18/2026
Deadline to File Motion to Certify Class	11/6/2026	11/25/2026
Deadline to File Opposition to <i>Daubert</i> Motions Related to Class Certification	1/13/2027	1/29/2027
Deadline to File Opposition to Motion to Certify Class	1/20/2027	2/5/2027
Deadline to File Reply in Support of <i>Daubert</i> Motion	2/26/2027	3/17/2027
Deadline to File Reply in Support of Motion to Certify Class	3/5/2027	3/24/2027
Parties to Inform the Court of Whether a Settlement Conference is Requested	3/19/2027	4/7/2027
Hearing on Motion for Class Certification	To be determined by the Court	To be determined by the Court
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	One week 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	Two weeks after the Court's decisions on Motion to Certify Class and Related <i>Daubert</i> Motions

Dated: April 2, 2026

Respectfully Submitted,

/s/ Michael B. Eisenkraft/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 the 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.

Event	Operative Deadline (see ECF No. 126)	Proposed Deadline
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**IT IS SO ORDERED.**

DATED: \_\_\_\_\_

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Honorable Sarah F. Russell  
United States District Judge