

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

TIARA YACHTS, INC.,

Case No. 1:22-cv-603

Plaintiff/Counter-Defendant,

Honorable Robert J. Jonker

v.

Magistrate Judge Ray Kent

BLUE CROSS BLUE SHIELD OF MICHIGAN,

Defendant/Counter-Plaintiff.

JOINT STATUS REPORT

Plaintiff/Counter-Defendant Tiara Yachts, Inc. (“Plaintiff” or “Tiara Yachts”) and Defendant/Counter-Plaintiff Blue Cross Blue Shield of Michigan (“Defendant” or “BCBSM”), submit the following Joint Status Report pursuant to the Notice of Hearing issued in this case on September 2, 2026. The Parties have met and conferred regarding Plaintiff’s Motion to Compel Production of Provider Contracts, Settlement Reports, Policies and Procedures (ECF No. 186) and Plaintiff’s Unopposed Second Motion to Amend the Case Management Order (ECF No. 190). The Parties have reached the following agreement:

1. The Parties agree that on or before September 18, 2026, Plaintiff will produce a list of fifty (50) claim numbers to Defendant.
2. On or before October 16, 2026, Defendant will produce the following documents relating to those claims that are within its possession, custody, or control: (1) provider payment agreements (including facility agreements) between BCBSM and applicable providers establishing the payment the provider was entitled to under its respective contract(s); (2) Electronic Data

Interchange (“EDI”) 837s and 835s; and (3) any other documents Defendant used to adjudicate the listed claims.

3. Following Defendant's production, Plaintiff will evaluate the information for purposes of preparing for the upcoming mediation, and if mediation is unsuccessful, for purposes of identifying whether additional documents relating to other claims is necessary to prepare its case.

4. For clarity, nothing in this stipulation shall be construed as an agreement by Defendant to the validity of any legal claims, arguments, allegations or any other aspect of the 50 claims selected by Plaintiff. Defendant reserves all arguments and defenses with respect to those claims.

5. To accomplish the foregoing, it is necessary to amend the Case Management Order. Specifically, the Parties seek to hold pending dates in abeyance pending completion of the sampling process and mediation.

6. Following mediation, the Parties will report status to the Court, and if necessary, request a status conference to set deadlines to complete any remaining discovery.

Dated: September 16, 2026

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CERTIFICATE OF SERVICE

I hereby certify that on September 16, 2026, I electronically filed the foregoing document with the Clerk of the Court using the ECF system, which will send notification of the filing to all counsel of record.

/s/ Perrin Rynders
Perrin Rynders (P38221)