IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF OHIO WESTERN DIVISION

COMMUNITY INSURANCE COMPANY D/B/A ANTHEM BLUE CROSS AND BLUE SHIELD,

Plaintiff,

Civil Action No. 1:25-cv-00388-MWM

v.

HALOMD, LLC, et al.

Defendants.

District Judge: Matthew W. McFarland

JOINT MOTION FOR EXTENSION OF BRIEFING SCHEDULE

Plaintiff Community Insurance Company d/b/a Anthem Blue Cross and Blue Shield ("Plaintiff") and Defendants HaloMD, LLC, Alla LaRoque, Scott LaRoque, MPowerHealth Practice Management, LLC, Evokes, LLC, Midwest Neurology, LLC, One Care Monitoring, LLC, and Value Monitoring, LLC ("Defendants"), by and through their counsel, hereby jointly move this Court to adjust the deadlines in this case to account for the Amended Complaint's addition of two new defendants.

On September 19, 2025, Plaintiff filed its Amended Complaint which listed Scott LaRoque and MPowerHealth Practice Management, LLC among the defendants for the first time. On September 29, 2025, Defendants Scott LaRoque and MPowerHealth Practice Management, LLC waived service of the summons by email, entitling them to respond to the Amended Complaint on or before November 28, 2025. The other Defendants' current deadline to respond to the Amended Complaint is October 10, 2025. The parties wish to avoid piecemeal briefing, to the extent possible. To conserve resources and to promote judicial efficiency, Counsel have conferred and agreed to the following proposed briefing schedule for all parties:

- All Defendants' motions to dismiss shall be due no later than November 10, 2025.
- Plaintiff's oppositions shall be due no later than December 17, 2025.
- Defendants' replies shall be due no later than January 5, 2026.

The Parties therefore respectfully ask the Court to enter the proposed schedule.

Respectfully submitted,

/s/ _Ariel M. Fox_ (with email permission)

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Counsel for Defendants Halo MD, LLC, Alla LaRoque, and Scott LaRoque

CERTIFICATE OF SERVICE

I hereby certify that on October 6, 2025, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all counsel who have appeared.

/s/ Michael R. Gladman

Counsel for Defendants MPowerHealth Practice Management, LLC, Evokes, LLC, Midwest Neurology, LLC, One Care Monitoring, LLC, and Value Monitoring, LLC