

ENTERED

March 03, 2026

Nathan Ochsner, Clerk

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

CHRISTY BURBAGE,

Plaintiff,

v.

U.S. ANESTHESIA PARTNERS, INC., et al.,

Defendants.

Case No.: 4:25-cv-00116

**STIPULATION AND ORDER REGARDING SUBSTITUTION OF PLAINTIFF AND
ADDITIONAL DEFENDANTS**

Christy Burbage (“Plaintiff”) and Defendants U.S. Anesthesia Partners, Inc., U.S. Anesthesia Partners Holdings, Inc., and U.S. Anesthesia Partners of Texas, P.A. (“Defendants”), together the Parties to the above Action, by and through their respective counsel, stipulate to the following regarding discovery.

The Parties enter into this stipulation with the request that the Court enter it as an order. Accordingly, **IT IS HEREBY ORDERED AS FOLLOWS:**

1. On February 10, 2026, Counsel for Plaintiff filed an Amended Complaint adding a new named plaintiff, Christy Burbage, and removing the prior named plaintiff, Basel Musharbash. Dkt. 116.
2. In addition, the Amended Complaint added two new Defendants, namely U.S. Anesthesia Partners of Texas, P.A., and U.S. Anesthesia Partners Holdings, Inc. *Id.*
3. The following stipulations and orders, previously negotiated and agreed to by counsel for Plaintiff Musharbash and Defendant U.S. Anesthesia Partners, Inc., shall apply with

equal force to Plaintiff Burbage and Defendants U.S. Anesthesia Partners of Texas, P.A., and U.S. Anesthesia Partners Holdings, Inc.:

- Protective Order (Dkt. No. 85);
- Stipulated Federal Rule of Evidence 502(d) Order (Dkt. No. 96);
- Stipulation and Order Regarding Electronic Discovery (Dkt. No. 97);
- Stipulation and Order Regarding Coordination of Fact Discovery (Dkt. No. 99);
- Supplemental Protective Order (Dkt. No. 100);
- Order and Stipulated Protocol for Expert Discovery (Dkt. No. 106); and
- Order and Stipulated Protocol Regarding Depositions (Dkt. No. 109).

THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the Parties, through their undersigned counsel of record, the Parties ask that the Court order.

IT IS SO STIPULATED.

Dated: February 27, 2026

For Plaintiff:

/s/ Kellie Lerner

Kellie Lerner (Pro Hac Vice)
Harrison McAvoy (Pro Hac Vice)
SHINDER CANTOR LERNER LLP
14 Penn Plaza, Fl. 19
New York, NY 10122
Phone: (646) 960-8608
kellie@scl-llp.com
harrison@scl-llp.com

Keagan H. Potts (Pro Hac Vice)
SHINDER CANTOR LERNER LLP
600 14th St. NW, 5th Fl.
Washington, DC 20005
Tel.: (646) 960-8601
Fax: (646) 960-8625
kpotts@scl-llp.com

Barrett H. Reasoner (Attorney in Charge)
Federal ID No. 14922
State Bar No. 16641980
Brice Wilkinson
Federal ID No. 1277347
State Bar No. 24075281
GIBBS & BRUNS LLP
1100 Louisiana, Suite 5300
Houston, TX 77002
Phone: (713) 751-5244
breasoner@gibbsbruns.com
bwilkinson@gibbsbruns.com

Kimberly A. Justice (Pro Hac Vice)
**FREED KANNER LONDON &
MILLEN LLC**
923 Fayette Street
Conshohocken, PA 19428
Phone: (224) 632-4500
kjustice@fkmlaw.com

Robert J. Wozniak (Pro Hac Vice)
**FREED KANNER LONDON &
MILLEN LLC**
100 Tri-State International Drive, Suite 128
Lincolnshire, IL 60069

For Defendant:

/s/ Geoffrey M. Klineberg

Geoffrey M. Klineberg* (D.C. Bar No.
444503)
Attorney-in-Charge
Kenneth M. Fetterman* (D.C. Bar No.
474220)
Bradley E. Oppenheimer* (D.C. Bar No.
1025006)
**KELLOGG, HANSEN, TODD,
FIGEL & FREDERICK, P.L.L.C.**
1615 M Street NW, Suite 400
Washington, DC 20036
Tel: (202) 326-7900
Fax: (202) 326-7999
*Admitted Pro Hac Vice

Karl S. Stern (TX Bar No. 19175665)
(Federal I.D. No. 04870)
Christopher D. Porter (TX Bar No.
24070437) (Federal I.D. No. 1052367)
Julianne Jaquith (TX Bar No. 24134925)
(Federal I.D. No. 3921126)
Melanie Guzman (TX Bar No.
24117175) (Federal I.D. No. 3745044)
**QUINN EMANUEL URQUHART &
SULLIVAN, LLP**
700 Louisiana St., Suite 3900
Houston, TX 77002
Tel: (713) 221-7000
Fax: (713) 221-7100
karlstern@quinnemanuel.com
chrisporter@quinnemanuel.com
juliannejaquith@quinnemanuel.com
melanieguzman@quinnemanuel.com

David J. Beck (TX Bar No. 00000070)
(Federal I.D. No. 16605)
Garrett S. Brawley (TX Bar No.
24095812)
(Federal I.D. No. 3311277)
BECK REDDEN LLP
1221 McKinney Street, Suite 4500
Houston, TX 77010
Tel: (713) 951-3700

Phone: (224) 632-4500
rwozniak@fklmlaw.com

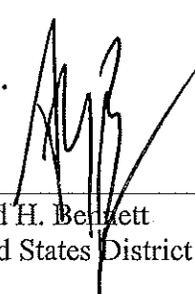
Justin S. Nematzadeh (Pro Hac Vice)
NEMATZADEH PLLC
101 Avenue of the Americas, Suite 909
New York, NY 10013
Phone: (646) 799-6729
jsn@nematlawyers.com

Fax: (713) 951-3720

*Counsel for Defendant U.S. Anesthesia
Partners, Inc.*

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: **MAR 02 2026**



Alfred H. Bennett
United States District Judge