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BY ECF

February 19, 2026

The Honorable Edgardo Ramos
United States District Court for the
Southern District of New York
40 Foley Square
New York, New York 10007

MEMO ENDORSED
at page 2

Re: *Joseph Greene v. Healthfirst PHSP, Inc.*, No. 25-cv-09058 (ER)

Dear Judge Ramos:

For Defendant Healthfirst PHSP, Inc. (“Healthfirst”), and jointly with Plaintiffs, we write pursuant to the Court’s Individual Practices, Rule I(E), to request an extension of Healthfirst’s deadline to answer or otherwise respond to the Amended Complaint (ECF No. 18), which is currently February 20, 2026, and for other procedural relief.

This joint request relates to a fully briefed motion in a separate action before the Court. Specifically, Your Honor has pending before you a motion to dismiss in a separate action filed by Plaintiffs’ counsel, *Doe v. Carelon Behavioral Health, Inc.*, No. 25-cv-03489 (“*Carelon*” and the “*Carelon* Motion”). The *Carelon* complaint contains similar claims and allegations as the Amended Complaint in the instant action. The Court’s ruling on the *Carelon* Motion will potentially bear directly on Plaintiffs’ claims in this action and on Healthfirst’s potential arguments for dismissal.

Counsel for Healthfirst and Plaintiffs have conferred and believe that the instant matter will proceed more efficiently if they wait to be guided by the Court’s upcoming ruling on the *Carelon* Motion. Indeed, that ruling will likely impact Healthfirst’s evaluation of its potential grounds for dismissal and may prompt Plaintiffs to further amend their pleadings. Mindful that there may be other procedures to address the above, the Parties propose the following:

- (1) Healthfirst’s deadline to answer or file a pre-motion letter pursuant to Individual Practice Rule 2(A)(ii) is extended to the earlier of April 30, 2026 or 30 days after a decision or other termination of the *Carelon* Motion.
- (2) Plaintiffs are hereby permitted to file a Second Amended Complaint, without the need to separately seek leave of Court, provided that Plaintiffs’ counsel notifies Healthfirst’s counsel of their intent to amend within no more than 10 days after the *Carelon* decision, and provided that such notice is sent prior to April 30, 2026. Plaintiffs shall file any such amended complaint within 30 days after the *Carelon* decision.

Hon. Edgardo Ramos
Greene v. Healthfirst PHSP, Inc., No. 25-cv-09058

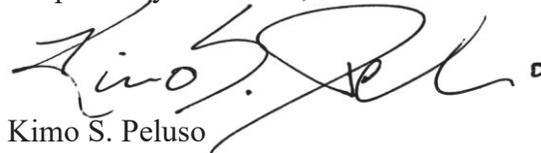
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- (3) The above-referenced notice of intent to amend shall extend Healthfirst's deadline to file an answer or pre-motion letter until 21 days after the amendment is filed (or 21 days after the amendment deadline passes without a Second Amended Complaint being filed).

In the alternative, if the Court prefers, the Parties are available for a conference to address the above request.

To the extent the Court declines the above relief, then Healthfirst requests, in the alternative, that its deadline to answer or file a pre-motion letter in response to the Amended Complaint be extended until seven days following the Court's ruling on this letter motion, an extension to which Plaintiffs' counsel also consents. This is Healthfirst's first request for an extension of time to respond to the Amended Complaint. We thank Your Honor for your consideration of this request.

Respectfully submitted,



Kimo S. Peluso

cc: Counsel of Record (by ECF)

Healthfirst PHSP Inc.'s deadline to answer or otherwise respond to the amended complaint is adjourned. A status conference will be held April 8, 2026, at 10:00 AM in Courtroom 619, 40 Centre Street, New York, NY 10007 before Judge Edgardo Ramos.

SO ORDERED.



Edgardo Ramos, U.S.D.J.
Dated: February 20, 2026
New York, New York