

Todd R. Johnston, OSB 992913  
tjohnston@hershnerhunter.com  
Alexandra P. Hilsher, OSB 114218  
ahilsher@hershnerhunter.com  
Hershner Hunter, LLP  
675 Oak St., Ste. 400  
Eugene, OR 97401  
Telephone: (541) 686-8511  
Facsimile: (541) 344-2025

Hayden K. Rooke-Ley, OSB 242890\*  
Hayden.k.rookeley@gmail.com  
1988 NW Savier St.  
Portland, OR 97209  
Telephone: (541) 514-0223  
*\*Application for admission forthcoming*

Brendan Ballou, DC Bar No. 241592\*  
brendan@publicintegrityproject.com  
Public Integrity Project LLC  
1763 Columbia Rd., Ste. 175 #357  
Washington DC 20009  
Telephone: (917) 684-3900  
*\*Pro hac vice application forthcoming*

Of Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
EUGENE DIVISION

KAREN STAPLETON, as guardian *ad litem*  
for JANE STAPLETON; DAN McGEE, MD,  
PhD, an individual and licensed medical  
practitioner; and EUGENE EMERGENCY  
PHYSICIANS, P.C., an Oregon professional  
corporation;

Plaintiffs,

v.

PEACEHEALTH, a Washington nonprofit  
corporation; APOLLOMD, INC., a Georgia  
corporation; APOLLOMD BUSINESS  
SERVICES, LLC; LANE EMERGENCY  
PHYSICIANS LLC, an Oregon limited  
liability corporation; and DOES 1 - 5;

Defendants.

Case No. 6:26-cv-00684-MTK

Plaintiffs Jane Stapleton, Dan Mcgee,  
MD, PhD, and Eugene Emergency  
Physicians, PC's

PROPOSED BRIEFING SCHEDULE  
AND STATUS REPORT

## CERTIFICATION

In compliance with LR 7-1, Plaintiffs have conferred multiple times and been unable to elicit Defendants' agreement on any issue.

### PROPOSED BRIEFING SCHEDULE AND STATUS REPORT

Plaintiffs provide the following in response to the Court's Order vacating the scheduling conference and requesting specific information [ECF No. 18]. Plaintiffs propose:

1. Briefing Schedule: (a) Any written Response to the Preliminary Injunction Motion filed on or before April 15 and any Reply by April 17. (b) Any opposition to expedited discovery filed by April 13.

2. Status Report: (a) Evidentiary Hearing: Plaintiffs expect that the hearing will take one day; (b) General Evidence to be Presented: testimony and documentary evidence relating to (i) Plaintiffs' and the community's need for a determination on the Preliminary Injunction Motion no later than April 30th (See, e.g. Declarations of Allan Hunter [ECF No. 9], Corey Orton [ECF No. 7], and Rose Fantozzi [ECF No.12] filed in support), after which the status quo will likely be lost and the harm irreversible, (ii) PeaceHealth and ApolloMD Defendants' actual plans, relationships and ownership structure, and (iii) the legality and impact of the same on Plaintiffs and the community; and (c) Need for Evidentiary Hearing: A hearing is critical to provide the Court with testimony from witnesses who will not provide sworn declarations out of fear of retribution from their employer/PeaceHealth and to allow the Court to make credibility determinations of certain key witnesses who have demonstrated credibility issues.

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3. Plaintiffs have set aside time for a hearing on any date from April 21-30 that is available for the Court.

DATED: April 10, 2026.

HERSHNER HUNTER, LLP

By /s/ **Todd R. Johnston**

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