

**UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT**

GUARDIAN FLIGHT LLC, et al.,

Plaintiffs,

v.

**AETNA LIFE INSURANCE
COMPANY et al.,**

Defendants.

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Civil Action No. 3:24-cv-00680-MPS

JURY TRIAL DEMANDED

STIPULATION REGARDING GENERAL BUSINESS PRACTICES

In connection with resolving a dispute over the scope of discoverable documents, the parties to the above captioned matter enter the following stipulation regarding Plaintiffs’ CUTPA/CUIPA claim.

The parties make this stipulation without waiver of any claims or defenses and/or any arguments regarding the viability of any causes of action or defenses asserted herein.

To resolve certain discovery disputes, each of the parties agrees and stipulates that, for purposes of Plaintiffs’ claim under the Connecticut Unfair Insurance Practices Act (“CUIPA”), with respect to the proof necessary to establish, support, or negate any contention in this action that any Defendant’s conduct constitutes a “general business practice,” *see* Conn. Gen. Stat § 38a-816(6), it is not necessary for the parties to present evidence of Defendants’ conduct involving any other specific healthcare providers (i.e., healthcare providers unaffiliated with Plaintiffs), given the volume of alleged claims submitted by Plaintiffs and their affiliates.

To avoid any confusion, Defendants do not waive the right or ability to challenge the sufficiency of Plaintiffs’ evidence of a “general business practice,” the sufficiency of Plaintiffs’ evidence as to any other element of their claim under CUIPA, or that the alleged conduct constitutes an unfair claim settlement practice. Rather, the purpose of this stipulation is to clarify

that Defendants will not argue that Plaintiffs failed to establish a “general business practice” because Plaintiffs did not present evidence of Defendants’ conduct involving other specific healthcare providers unaffiliated with Plaintiffs.

Dated: January 9, 2025

/s/ Adam T. Schramek
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