

**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

JOINT MOTION FOR STAY

Plaintiffs Guardian Flight, LLC (“Guardian Flight”), REACH Air Medical Services, LLC (“REACH”), CALSTAR Air Medical Services, LLC (“CALSTAR”), Med-Trans Corporation (“Med-Trans”), Air Evac EMS, Inc. (“Air Evac”), AirMed International LLC (“AirMed”) (collectively “Plaintiffs”), and Defendants Aetna Life Insurance Company, Aetna Health Inc., Aetna Life Insurance Company Inc. (“Aetna”) and Cigna Health and Life Insurance Company (Plaintiffs, Aetna and Cigna are collectively referred to herein as the “Parties”) hereby jointly seek to stay the above styled matter until August 22, 2025, in response to the settlement conference that took place earlier today with Judge Richardson.

On July 15, 2025, the Parties attended the settlement conference with Judge Richardson. As noted in Judge Richardson’s Minute Entry (Doc. 287), the case is not settled and the Parties continue to discuss a potential path toward settlement. As a result, the Parties respectfully request that the matter be stayed until August 22, 2025. All remaining deadlines in the scheduling order, including today’s deadline for Parties to serve expert reports on affirmative claims for relief and for Plaintiffs to supplement their damages disclosure, will be stayed during this time, during which time the Parties intend to focus on dispute resolution efforts. Absent an extension of the stay, the Parties’ July 15 deadlines will be due on August 29, 2025, seven days after the expiration of the

requested stay (unless extended). Additionally, the Parties request that the deadline for Aetna to file its Amended Counterclaim be due on September 2, 2025, nine days after the expiration of the requested stay (as modified for the holiday, unless extended). Upon the expiration of the stay (unless extended), the Parties respectfully request that the Court issue an amended scheduling order extending all stayed deadlines by forty (40) days, unless otherwise addressed herein.

The Parties note that they are aware of D. Conn. L.R. 7(b) which requires that all extensions be filed at least three business days before the deadline. The Parties, however, were not aware of the need for a stay prior to today's settlement conference with Judge Richardson, and request that the Court grant the stay in light of the progress made during the settlement conference.

CONCLUSION

For these reasons, the Parties respectfully request that the Court grant the Agreed Motion to Stay as proposed above.

Dated: July 15, 2025

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