

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF ILLINOIS
 EASTERN DIVISION

IN RE: MULTIPLAN HEALTH
 INSURANCE PROVIDER LITIGATION

Case No. 1:24-cv-06795
 MDL No. 3121

This Document Relates To:

Hon. Matthew F. Kennelly

ALL ACTIONS

**CASE MANAGEMENT ORDER NO. 17 - JOINT
 DISCOVERY AND CASE MANAGEMENT SCHEDULING ORDER**

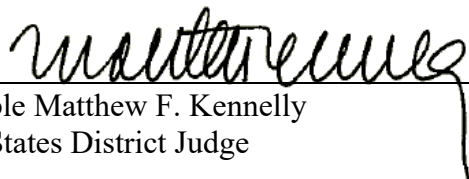
Pursuant to the Court’s July 22, 2025 Minute Entry and direction therein, the parties propose the following Joint Discovery and Case Management Scheduling Order:

<u>EVENT</u>	<u>DATE</u>
First day on which 3rd Set of RFPs and other written discovery requests may be served	June 24, 2025
Submission of agreed DAP formatted discovery form and scope of related document discovery or, if no agreement can be reached, DAPs may file a brief of up to 5 pages and Defendants may file a brief of up to 5 pages with their separate proposals	July 15, 2025
Production of structured data samples (at least 50 lines) (Applicability to DAPs to be addressed separately by the Court)	July 24, 2025
DAPs to provide completed answers to formatted discovery forms and related document discovery to Defendants	August 12, 2025
Answers and Counterclaims Under FRCP 12 to Consolidated Class Action Complaint and Amended Consolidated Master Direct Action Plaintiff Complaint	August 12, 2025
Joint status report and a proposed order concerning agreements on the scope, format and deadlines regarding production of structured data or, if disagreement on the proposed order, Plaintiffs collectively may file a brief of up to 10 pages and Defendants collectively may file a brief of up to 10 pages	August 18, 2025

EVENT	DATE
<p>Deadline for producing party's disclosure of initial list of its own proposed document custodians and custodial sources as to requests for which it agrees to produce documents [ESI Protocol V.A]</p> <p>Deadline for parties to meet and confer regarding non-custodial document sources that the producing Party believes, based on its investigations to date, may reasonably be likely to contain unique information responsive to requests for which it agrees to produce documents [ESI Protocol V.B]</p> <p>Deadline to meet and confer regarding (i) potential use and identification of search terms, tools, or techniques, (ii) use of technology assisted review or artificial intelligence ("TAR/AI") in whole or part to cull any corpus of materials, and (iii) all parameters for scoping the review and production efforts (e.g., application of date ranges, custodians, non-custodial sources, etc.) for requests for which the producing party agrees to produce documents. [ESI Protocol V.E.1.a]</p> <p>(Affected parties to be addressed separately by the Court)</p>	August 25, 2025
Defendants notify DAPs of any deficiencies in their formatted discovery form responses and production of documents	September 4, 2025
Deadline for submission of an agreed TAR/AI Protocol to the Court, or competing proposals with supporting briefs of no more than 5 pages total for Plaintiffs collectively and 5 pages total for Defendants collectively [from ESI Protocol Section E.2.a]	September 8, 2025
Deadline to submit agreed deposition protocol and agreement on number of fact depositions, or joint motion setting forth areas of dispute	September 8, 2025
Deadline to complete search methodology negotiations and submit any remaining search term disputes relating to 3rd RFPs. ESI Protocol Section V.E.3.e-f (pages 27-28)	September 12, 2025
Respective DAPs amend formatted discovery form responses and/or supplement discovery, as necessary	September 16, 2025
Parties submit to the Court agreed proposal for DAP discovery bellwether cases or, if no agreement, competing proposals with supporting briefs of no more than 15 pages total for Plaintiffs and 15 pages total for Defendants	September 30, 2025
Deadline for substantial completion of document productions in response to Third Set of RFPs	January 23, 2026

EVENT	DATE
Deadline for any motions to amend the pleadings	March 6, 2026
Last day on which parties may serve requests for production	June 29, 2026
Last day on which parties may serve interrogatories	July 29, 2026
Close of Fact Discovery	September 10, 2026
Plaintiffs' Merits and Class Certification Expert Reports	October 16, 2026
Defendants' Merits and Class Certification Expert Reports	December 23, 2026
Plaintiffs' Rebuttal Merits and Class Certification Expert Reports	March 2, 2027
Close of Expert Discovery	March 31, 2027
Class Certification Motion (Timing and parameters of <i>Daubert</i> motions to be later addressed)	April 7, 2027
Class Certification Opposition Brief	May 18, 2027
Class Certification Reply Brief	June 30, 2027
Class Certification Hearing	(to be determined)
Summary Judgment Motions (Timing and parameters of <i>Daubert</i> motions to be later addressed)	July 1, 2027
Summary Judgment Opposition Briefs	August 13, 2027
Summary Judgment Replies	September 14, 2027
Parties to submit joint status report or stipulation concerning (1) remand or transfer of cases centralized by Judicial Panel on Multidistrict Litigation, (2) deadlines for motions in limine briefing and evidentiary stipulations, and (3) deadlines for all remaining DAP actions	(to be determined)
Pre-Trial Conference	(to be determined)
First Trial Begins	December 6, 2027

SO ORDERED this 30th day of July, 2025.



 Honorable Matthew F. Kennelly
 United States District Judge