

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

IN RE: CHANGE HEALTHCARE, INC.
CUSTOMER DATA SECURITY
BREACH LITIGATION

Case No. 24-md-03108 (DWF/DJF)

This Document Relates to All Actions

**PARTIES' JOINT STATUS
CONFERENCE STATEMENT
REGARDING ISSUES ABOUT
DISCOVERY AND BRIEFING
SCHEDULES FOR APRIL 17,
2025**

Pursuant to the Court's PTO No. 2 (*See* Dkt. No. 69), the Parties submit this joint status report regarding the scheduled April 17, 2025 status conference.

There are currently no disputes that require Court's attention. The Parties have agreed on stipulations regarding limited discovery on personal jurisdiction and a briefing schedule for Plaintiffs motions for a Preliminary Injunctions, Declaratory Judgment and for Court Supervision of Communications between Defendants and the putative class members. If the Court accepts the Parties' stipulations, there is nothing more to decide at this status conference.

The Parties are happy to attend the April 17, 2025, status conference in person or by video/audio conference or to have the Court cancel it if the Court does not see the need. We leave that to the Court's discretion. Below we set forth the status of the present issues the parties have either reached agreement on (subject to Court approval) or are continuing to meet and confer.

1. ***Personal Jurisdiction and Stay of Discovery.*** On April 4, 2025, Plaintiffs

filed a motion to lift the stay of discovery to seek information necessary to respond to certain Defendants' motions to dismiss for lack of personal jurisdiction. After the Parties met and conferred, they agreed to lift the stay for the limited purpose of allowing Plaintiffs to serve its personal jurisdiction discovery on Change HealthCare Inc. and Change HealthCare Operations. If this limited lift of the stay is acceptable to the Court, the Parties ask that the Court enter that order.

2. ***Plaintiffs' Motions for Injunction, Declaratory and Supervision of Communications.*** On April 2, 2025, certain Plaintiffs filed motions for a Preliminary Injunctions, Declaratory Judgment and for Court Supervision of Communications between Defendants and the putative class members. *See* (Dkt. Nos. 276, 283, 289). As directed by the Court, the Parties met and conferred and agreed on a briefing schedule for these motion. *See* (Dkt. No. 308). In addition to setting dates for briefing, the Parties agreed to request that the Court set argument on these motions for May 15, 2025 to coincide with the status conference already scheduled for that day. If acceptable to the Court, the Parties ask that the Court enter the Order.

3. ***Certain Defendants' Personal Jurisdiction Motions.*** On April 21, 2025, Certain Defendants filed motions to dismiss for lack of personal jurisdiction. As mentioned above, Plaintiffs sought discovery to respond to these motions and the Parties agreed on a process to lift the stay and serve discovery. That discovery will now be subject to objections, meet and confers, and, potentially,

some production. Because of the time necessary to undertake this discovery process, the current deadline for Plaintiffs to respond to Defendants' motions to dismiss (April 25, 2025) will not work for the personal jurisdiction motions. The Parties continue to meet and confer regarding an appropriate briefing schedule regarding Defendants Rule 12(b)(2) Motion, including whether Plaintiffs' responses to Defendants other pending Rule 12 motions should also be delayed.. The Parties agree to update the Court as soon as practicable.

4. ***Motion to Compel on "Forensic Reports."*** The Plaintiffs originally planned to file their motion to compel on the "forensic reports" in early April but the Parties meet and confers on this issue is ongoing. The Parties have now met and conferred (and Defendants have agreed to provide certain documents to Plaintiffs) so that the Parties are now conferring about a stipulated briefing schedule. Assuming that Defendants produce the agreed upon documents no later than April 18, 2025, the Parties agree to update the Court as to briefing of this issue shortly thereafter.

5. ***The Production of Early Discovery.*** The Parties are working on collecting the information subject to early discovery agreements and orders. No Court action is required at this time.

The Parties are happy to discuss these issues and others as the Court desires whether in person, by video/teleconference. The Parties have no other issues to raise with the Court and thus, would also be amendable to cancelling the April conference if so desired by the Court.

Please call us if you have any questions.

Dated: April 11, 2025

/s/ Daniel E. Gustafson

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