

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

ISABELLA BRISTOW, on behalf of herself	:	
and others similarly situated,	:	
	:	2:22-cv-00235-WB
Plaintiff,	:	
	:	
v.	:	
	:	
AMERIHEALTH CARITAS,	:	
	:	
Defendant.	:	

JOINT PROPOSAL FOR REPRESENTATIVE DISCOVERY

Having conferred pursuant to the Proposed Case Management Plan submitted for the Court’s consideration on May 18, 2022, counsel for all parties have met and conferred and now submit the following Joint Proposal for Representative Discovery.

1. Written Discovery

a. For Defendant

- i. Full discovery from Named Plaintiff
- ii. Limited to 15 Opt-In Plaintiffs, randomly selected, and up to 5 additional Opt-In Plaintiffs, to be selected by Defendant, and up to an additional 5 Opt-In Plaintiffs to be selected by Plaintiff.

1. The combined sample of 25 selected Opt-In Plaintiffs is hereinafter referred to as “Sample Opt-In Plaintiffs.”

- iii. 10 interrogatories and 10 document requests per Sample Opt-In Plaintiff.

b. For Plaintiff

- i. One set of 10 interrogatories and 10 document requests seeking class-wide

payroll/time data and certain relevant policy documents.

- ii. Individualized discovery requests (no more than 10 interrogatories and 10 document requests) pertaining to the Named Plaintiff and each of the Sample Opt-In Plaintiffs.

2. Depositions

a. For Defendant

- i. Limited to the Named Plaintiff and up to 15 of the Sample Opt-In Plaintiffs.

b. For Plaintiff

- i. The ability to depose an immediate supervisor of (i) the Named Plaintiff and (ii) up to 10 of the Sample Opt-In Plaintiffs.
- ii. Up to 5 additional depositions of individuals with relevant knowledge or within the supervisory chain of CHC Service Coordinators (including a 30(b)(6) deposition).
 1. Defendant reserves the right to designate more than one 30(b)(6) designee, which will not diminish Plaintiff's four remaining depositions.

In consideration for Defendant's agreement to this limited discovery proposal, Plaintiff agrees that opt-in declarations related to decertification will be limited to the Named Plaintiff and Sample Opt-In Plaintiffs. By agreeing to the above, the parties do not waive any objection to any particular discovery request or deposition notice.

FOR PLAINTIFF:

/s/ Michael Groh

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SO ORDERED this 14th day of June 2022.

BY THE COURT:

/s/Wendy Beetlestone, J.

Wendy Beetlestone, U.S.D.J.