

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION**

Chianne D., et al.,

Plaintiffs,

v.

Case No. 3:23-cv-00985-MMH-LLL

Jason Weida, in his official capacity
as Secretary for the Florida Agency
for Health Care Administration, et al.,

Defendants.

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JOINT PROPOSED BRIEFING SCHEDULE

PLEASE TAKE NOTICE that in accordance with the Court’s direction during the August 29, 2023 status conference (Dkt. 23) to file a proposed briefing schedule for Plaintiffs’ Motion for Class Certification (Dkt. 2) and Motion for a Classwide Preliminary Injunction (Dkt. 3) (collectively, the “Motions”), the Parties jointly submit the following:

1. Proposed briefing and hearing schedule.

Action or Event	Date or Deadline
Defendants’ Responses to Plaintiffs’ Motions.	October 6, 2023 (28 days from filing joint briefing schedule).
Plaintiffs’ Reply to Defendants’ Responses to Plaintiffs’ Motions.	October 16 (10 days after Defendants’

	responses are due). ¹
Hearing and oral argument on Plaintiffs' Motions.	Between October 23 and November 3 (7 to 18 days after Plaintiffs' replies are due). ²
Defendants' response to Plaintiffs' Complaint.	14 days after the Court's Order(s) on Plaintiffs' Motions.
Plaintiffs' Response to Defendants' dispositive motion, if one is filed.	21 days after Defendants' responsive pleading is due.

2. Discovery Proposal.

The parties have agreed to conduct narrow document discovery in advance of Defendants' response to Plaintiffs' Motion for Class Certification in order to identify the universe of documents and communications exchanged between named Plaintiffs and the Department of Children and Families (DCF) since January 2022 (the "Responsive Documents"). Specifically:

- a. DCF³ will produce the Responsive Documents in its possession.
- b. Within seven days of DCF's production, Plaintiffs will:
 - i. Supplement that production with any different or additional Responsive Documents not contained in DCF's production.

¹ Defendants oppose the submission of new evidence with Plaintiffs' reply and reserve their rights to seek relief in that respect.

² Counsel for Plaintiffs are unavailable on October 26, 2023. Counsel for Defendants are unavailable on October 26 and 27, 2023.

³ DCF was sued through its Secretary, Shevaun Harris, in her official capacity.

ii. For each document or communication produced by DCF, stipulate whether or not Plaintiffs received that document or communication, and if so, identify the date and method of receipt.

c. To the extent either party later discovers Responsive Documents that were not previously produced by any party, the party that discovers the Responsive Documents will produce them without delay. If DCF makes a supplemental production, the requirements of Paragraph 2.b.ii. above shall apply.

Dated: September 8, 2023

Respectfully submitted,

FOR THE PLAINTIFFS

By: /s/ Katy DeBriere

FLORIDA HEALTH JUSTICE PROJECT

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CERTIFICATE OF SERVICE

I hereby certify that, on September 8, 2023, I electronically filed the foregoing with the Clerk of the Court on all counsel of record by using the CM/ECF system.

/s/Katy DeBriere
Katy DeBriere