

**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, et al.,

Defendants.

_____ /

**PLAINTIFFS' RESPONSE TO
DEFENDANTS' TIME-SENSITIVE MOTION TO REOPEN THE EVIDENCE**

Pursuant to M.D. Loc. R. 3.01(b) and the Court's endorsed order (Doc. 169), Plaintiffs file this response to Defendants' Time-Sensitive Motion to Reopen the Evidence. (Doc. 168). After having the opportunity to review Defendants' motion, Plaintiffs were able to craft a proposed stipulation and maintain that this matter can be resolved through such a stipulation, without expending judicial resources to reopen live testimony. But, in the event the parties cannot reach agreement, Plaintiffs do not oppose reopening the record on limited grounds.

On Thursday, August 22, 2024, counsel for Defendants emailed counsel for Plaintiffs and requested their position about a motion to reopen the evidence or, in the alternative, consider filing a joint stipulation "regarding reason code 241 that Mr. Kallumkal testified about at trial" which defense counsel represented

“would be live in production on notices no later than Monday the 29th.” The entire conferral email exchange between the parties is attached hereto as Exhibit 1.

On Monday, August 26, 2024, defense counsel emailed Plaintiffs’ counsel and asked for a response by close of business on August 27, 2024. Within the hour, Plaintiffs responded they were still reviewing but would get a response to defense by the requested deadline.

On August 27th, Plaintiffs provided their position, offering that, while they opposed reopening the record, they were open to a stipulation. Prior to agreeing to a stipulation, however, Plaintiffs asked Defendants to provide their proposed language for the stipulation, explain the probative value of the new evidence, and supply any additional evidence about the nature of the reason code change and how DCF planned to implement it.¹ Defendants did not answer Plaintiffs questions. Instead, they filed the instant motion the evening of August 27th.

Defendants’ request to reopen a closed trial record is not a small matter. Plaintiffs took the time necessary to confer internally about all possible

¹ Mr. Kallumkal did not (and could not) testify to how a reason code will appear in notices actually sent to enrollees (referred to as “production notices”) because Mr. Kallumkal is not a DCF employee and Deloitte does not routinely review production notices as part of its work. *See Depo. Desig. of Hari Kallumkal at 142:14-24* (“our job description doesn't have that we have to review notices...[w]e don't actually look into the notice to see if a specific code is printed, and what language it is printed in.”). In their motion, Defendants did not (and could not) cite to any trial testimony describing how DCF actually implements a reason code change like the one described because none was offered. This lack of evidence, serves, in part, as the basis for Plaintiffs’ concern about reopening the record.

consequences of agreeing to reopen the record or, alternatively, entering into a stipulation that would alter a closed trial record. Given the significance of the request, it was especially important that key members of Plaintiffs' counsel be part of the final response decision. And, due to a personal family medical matter, one of those key members, Sarah Grusin, was unavailable starting Friday, August 23, 2024, and could not return to the office until Tuesday, August 27, 2024. Prior to August 27th, defense counsel did not indicate that they believed their motion was "time-sensitive."

When Plaintiffs responded with their position to Defendants' request, the hope was to work through Plaintiffs' concerns so a stipulation could be reached, saving the time and resources of the parties and the Court. Rather than engage with Plaintiffs about their concerns, however, Defendants filed this motion.

After reading Defendants' motion (Doc. 168 at 4-5), Plaintiffs' first concern regarding the proposed probative value of Ms. Anderson's testimony has now been addressed. To address Plaintiffs' second concern, on August 28th, they asked Defendants to consider the following stipulation:

"The change to reason code 241 that Mr. Hari Kallumkal testified about during trial² went into production on August 24, 2024. This stipulation does not constitute evidence of the actual effect of the change."

² See Kallumkal Test., Tr. Vol. VI, 15:15-20:6.

This stipulation would ensure that no further inferences about the efficacy of DCF's putting the reason code change into production would be drawn from the new evidence.

At 4pm on August 29, 2024, Defendants responded that they could not agree to the second sentence of Plaintiffs' proposed stipulation. Plaintiffs promptly replied and invited Defendants to offer alternatives. As of the time of filing this motion, Defendants have not answered Plaintiffs' reply.

If the parties cannot reach agreement on a stipulation, then Plaintiffs do not oppose reopening the record to allow Defendants the opportunity to provide very limited testimony about when the change to reason code 241 "was put into production" so long as Plaintiffs can fully and fairly cross-examine Defendants' witness.

Respectfully Submitted,

/s/Katy DeBriere

NATIONAL HEALTH LAW PROGRAM

Sarah Grusin (admitted *pro hac vice*)
Jane Perkins (admitted *pro hac vice*)
Miriam Heard (admitted *pro hac vice*)
Amanda Avery (admitted *pro hac vice*)

1512 E. Franklin Street, Suite 110
Chapel Hill, NC 27541

FLORIDA HEALTH JUSTICE PROJECT

Katy DeBriere (FL Bar No. 58506)
Miriam Harmatz (FL Bar No. 562017)
Lynn Hearn (FL Bar No. 123633)
Ronnie Graham (FL Bar No. 1032153)
Jerron Wheeler (FL Bar No. 1032240)

3900 Richmond St.
Jacksonville, FL 32205

(919) 968-6308

(352) 496-5419

grusin@healthlaw.org
perkins@healthlaw.org
heard@healthlaw.org
avery@healthlaw.org

debriere@floridahealthjustice.org
harmatz@floridahealthjustice.org
hearn@floridahealthjustice.org
graham@floridahealthjustice.org
wheeler@floridahealthjustice.org



Katy DeBriere <debriere@floridahealthjustice.org>

Re: Chianne D. v. Weida - Conferral

1 message

Katy DeBriere <debriere@floridahealthjustice.org>

Thu, Aug 29, 2024 at 4:02 PM

To: Andy Bardos <Andy.Bardos@gray-robinson.com>

Cc: Sarah Grusin <grusin@healthlaw.org>, Ashley Hoffman Lukis <ashley.lukis@gray-robinson.com>, "Tim Moore, Jr." <tim.moore@gray-robinson.com>, Lynn Hearn <hearn@floridahealthjustice.org>, Miriam Heard <heard@healthlaw.org>, Miriam Harmatz <harmatz@floridahealthjustice.org>, Ronnie Graham <graham@floridahealthjustice.org>, Jerron Wheeler <wheeler@floridahealthjustice.org>, Amanda Avery <avery@healthlaw.org>

Would you like to propose any alternatives?

On Thu, Aug 29, 2024 at 4:01 PM Andy Bardos <Andy.Bardos@gray-robinson.com> wrote:

Hi Katy,

Thanks for this proposed revision to our proposal, but we cannot agree to the second sentence.

Thanks,

Andy

Andy Bardos

Tallahassee Deputy Managing Shareholder

T 850.577.9090
D 850.577.6959
F 850.577.3311



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From: Katy DeBriere <debriere@floridahealthjustice.org>
Sent: Wednesday, August 28, 2024 12:07 PM
To: Andy Bardos <Andy.Bardos@gray-robinson.com>
Cc: Sarah Grusin <grusin@healthlaw.org>; Ashley Hoffman Lukis <ashley.lukis@gray-robinson.com>; Tim Moore, Jr. <tim.moore@gray-robinson.com>; Lynn Hearn <hearn@floridahealthjustice.org>; Miriam Heard <heard@healthlaw.org>; Miriam Harmatz <harmatz@floridahealthjustice.org>; Ronnie Graham <graham@floridahealthjustice.org>; Jerron Wheeler <wheeler@floridahealthjustice.org>; Amanda Avery <avery@healthlaw.org>
Subject: Re: Chianne D. v. Weida - Conferral

This message originated outside of GrayRobinson.

Hi Andy,

In an effort to work toward a resolution of your pending motion, Plaintiffs offer the following edits to the proposed stip:

"The change to reason code 241 that Mr. Hari Kallumkal testified about during trial^[1] went into production on August 24, 2024. This stipulation does not constitute evidence of the actual effect of the change."

[1] Vol. VI, 15:15-20:6

This stipulation would alleviate Plaintiffs' concerns that Sarah raised yesterday. Thanks for letting us know your thoughts.

Sincerely,

Katy

Katy DeBriere

Legal Director

Florida Health Justice Project

www.floridahealthjustice.org

(352) 496-5419

debriere@floridahealthjustice.org

On Tue, Aug 27, 2024 at 5:23 PM Andy Bardos <Andy.Bardos@gray-robinson.com> wrote:

Hi Sarah,

I'm sorry to hear about your personal family emergency and hope that you and your family are well.

We are happy to continue to discuss a potential stipulation and to try to better understand what evidence you are looking for. In the meantime, I'm sure you understand why we think the filing of our motion is time-sensitive.

Rather than attach a lengthy email chain, we will prepare a certificate of conferral that we think accurately summarizes our conferral.

Thank you,

Andy

Andy Bardos

Tallahassee Deputy Managing Shareholder

T 850.577.9090

D 850.577.6959

F 850.577.3311



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From: Sarah Grusin <grusin@healthlaw.org>

Sent: Tuesday, August 27, 2024 5:11 PM

To: Andy Bardos <Andy.Bardos@gray-robinson.com>

Cc: Ashley Hoffman Lukis <ashley.lukis@gray-robinson.com>; Katy DeBriere <debriere@floridahealthjustice.org>; Tim Moore, Jr. <tim.moore@gray-robinson.com>; Lynn Hearn <hearn@floridahealthjustice.org>; Miriam Heard <heard@healthlaw.org>; Miriam Harmatz <harmatz@floridahealthjustice.org>; Ronnie Graham <graham@floridahealthjustice.org>; Jerron Wheeler <wheeler@floridahealthjustice.org>; Amanda Avery <avery@healthlaw.org>

Subject: Re: Chianne D. v. Weida - Conferral

This message originated outside of GrayRobinson.

Andy,

We appreciate Defendants' sense of urgency here, but from our view we believe the parties could take a few more days to try and work this out. Plaintiffs have been internally discussing Defendants' proposal - though, as I mentioned last week, I was traveling due to a personal family medical emergency, and so it took us an extra couple of days to reach our position.

That said, this email exchange reinforces our concern: Ashley's email said that the "change went into production" on August 24th, whereas your email states that it "was implemented." As we stated previously, we have no evidence related to the nature of the implementation - thus, we don't yet know whether the change will work as intended and, therefore, are hesitant to stipulate to that fact. Therefore, the exact language of the stipulation is important to us.

We do remain open to conferring to see if the parties can reach agreement and avoid needing to involve the Court. But if Defendants insist on filing this motion imminently, without engaging in this process, then we believe, at this point, the best way to capture Plaintiffs' position would be to attach this email chain to your motion.

-Sarah

On Tue, Aug 27, 2024 at 4:55 PM Andy Bardos <Andy.Bardos@gray-robinson.com> wrote:

Hi Sarah,

The stipulation would say just what Ashley said in her email: that the change regarding reason code 241 that Mr. Kallumkal testified about at trial was implemented on August 24, 2024.

Given that our post-trial briefs are due in 22 days, and time is of the essence, we think we need to go ahead and file the motion. It is already five days since Ashley sent her conferral email, and you have already represented that the plaintiffs oppose our motion. I am happy to include your three paragraphs in the certificate of conferral if you don't intend to file a response. Otherwise, we will note your opposition and let your response speak for itself.

Thanks,

Andy

Andy Bardos

Tallahassee Deputy Managing Shareholder

T 850.577.9090

D 850.577.6959

F 850.577.3311



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From: Sarah Grusin <grusin@healthlaw.org>

Sent: Tuesday, August 27, 2024 4:37 PM

To: Andy Bardos <Andy.Bardos@gray-robinson.com>

Cc: Ashley Hoffman Lukis <ashley.lukis@gray-robinson.com>; Katy DeBriere <debriere@floridahealthjustice.org>; Tim Moore, Jr. <tim.moore@gray-robinson.com>; Lynn Hearn <hearn@floridahealthjustice.org>; Miriam Heard <heard@healthlaw.org>; Miriam Harmatz <harmatz@floridahealthjustice.org>; Ronnie Graham <graham@floridahealthjustice.org>; Jerron Wheeler <wheeler@floridahealthjustice.org>; Amanda Avery <avery@healthlaw.org>

Subject: Re: Chianne D. v. Weida - Conferral

This message originated outside of GrayRobinson.

Andy,

We asked to review a draft of a proposed stipulation and any evidence of the implementation of 241 -- which Mr. Kallumkal anticipated, but could not testify to, since as Ashley stated, the change was not implemented until August 24th. We simply cannot agree to a stipulation that we have not seen.

If Defendants do not wish to engage in this attempt to reach agreement prior to filing, then we ask that you include the full three paragraphs in my prior email and indicate that Defendants elected not to provide a draft stipulation for our review. Alternatively, you can attach this email chain.

-Sarah

On Tue, Aug 27, 2024 at 4:28 PM Andy Bardos <Andy.Bardos@gray-robinson.com> wrote:

Hi Sarah,

Could you please clarify what additional information you are looking for?

- “evidence related to the nature of the 241 reason code change and its implementation” – this was presented by Mr. Kallumkal at trial.
- “Defendants’ explanation of the need for further evidence on this point” – this was presented in Ashley’s email.

I'm happy to include the three paragraphs. Do you intend to file a separate written response?

Thanks,

Andy

Andy Bardos

Tallahassee Deputy Managing Shareholder

T 850.577.9090

D 850.577.6959

F 850.577.3311



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From: Sarah Grusin <grusin@healthlaw.org>

Sent: Tuesday, August 27, 2024 4:24 PM

To: Andy Bardos <Andy.Bardos@gray-robinson.com>

Cc: Ashley Hoffman Lukis <ashley.lukis@gray-robinson.com>; Katy DeBriere <debriere@floridahealthjustice.org>; Tim Moore, Jr. <tim.moore@gray-robinson.com>; Lynn Hearn <hearn@floridahealthjustice.org>; Miriam Heard <heard@healthlaw.org>; Miriam Harmatz <harmatz@floridahealthjustice.org>; Ronnie Graham <graham@floridahealthjustice.org>; Jerron Wheeler <wheeler@floridahealthjustice.org>; Amanda Avery <avery@healthlaw.org>

Subject: Re: Chianne D. v. Weida - Conferral

This message originated outside of GrayRobinson.

Andy, if you do not plan on sharing the additional information we mentioned at the end of the email, then we ask that you include the full three paragraphs as our position in the motion.

Thanks,

Sarah

On Tue, Aug 27, 2024 at 4:21 PM Andy Bardos <Andy.Bardos@gray-robinson.com> wrote:

Thanks Sarah. We will note the plaintiffs' opposition.

Andy Bardos

Tallahassee Deputy Managing Shareholder

T 850.577.9090

D 850.577.6959

F 850.577.3311



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From: Sarah Grusin <grusin@healthlaw.org>

Sent: Tuesday, August 27, 2024 4:02 PM

To: Ashley Hoffman Lukis <ashley.lukis@gray-robinson.com>

Cc: Katy DeBriere <debriere@floridahealthjustice.org>; Andy Bardos <Andy.Bardos@gray-robinson.com>; Tim Moore, Jr. <tim.moore@gray-robinson.com>; Lynn Hearn <hearn@floridahealthjustice.org>; Miriam Heard <heard@healthlaw.org>; Miriam Harmatz <harmatz@floridahealthjustice.org>; Ronnie Graham <graham@floridahealthjustice.org>; Jerron Wheeler <wheeler@floridahealthjustice.org>; Amanda Avery <avery@healthlaw.org>

Subject: Re: Chianne D. v. Weida - Conferral

This message originated outside of GrayRobinson.

Hi Ashley,

Plaintiffs oppose reopening the trial record. The parties have had ample opportunity to present relevant evidence to the Court, including on the changes to the 241 reason code. In fact, the record already includes testimony on the nature of the change and the anticipated timing of the change. Given the state of the record, Plaintiffs do not understand what further probative value this evidence has. Thus, Plaintiffs' position is that reopening of the trial record is inefficient and unnecessary to resolve the issues before the court.

Furthermore, reopening the trial record on this point--without providing Plaintiffs any opportunity to conduct discovery about the practical implementation of the change--risks prejudice to Plaintiffs. For instance, we don't yet know whether the change will work as intended and, therefore, are hesitant to stipulate to that fact.

That said, to avoid presenting the Court with a contested motion at this late stage in the proceedings and to conserve judicial resources, Plaintiffs are willing to review evidence related to the nature of the 241 reason code change and its implementation and Defendants' explanation of the need for further evidence on this point, along with a draft of a concise proposed stipulation, to see if the parties can reach agreement.

Thanks,
Sarah

On Mon, Aug 26, 2024 at 6:33 PM Ashley Hoffman Lukis <ashley.lukis@gray-robinson.com> wrote:

Thanks!

Ashley Hoffman Lukis

Shareholder

T 850.577.9090

F 850.577.3311



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On Aug 26, 2024, at 6:04 PM, Katy DeBriere <debriere@floridahealthjustice.org> wrote:

This message originated outside of GrayRobinson.

Yes, we're still reviewing but we will definitely get you a response before the end of the day tomorrow.

Sincerely,

Katy DeBriere

Legal Director

Florida Health Justice Project

www.floridahealthjustice.org

(352) 496-5419

debriere@floridahealthjustice.org

On Mon, Aug 26, 2024 at 5:24 PM Ashley Hoffman Lukis <ashley.lukis@gray-robinson.com> wrote:

Good afternoon,

The reason code 241 change went into production on Saturday 8/24. Could you please let us know Plaintiffs' position on the motion to reopen by close of business tomorrow? Let us know if you would like to discuss.

Thanks,

Ashley

Ashley Hoffman Lukis

Shareholder

T 850.577.9090

F 850.577.3311



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From: Ashley Hoffman Lukis
Sent: Thursday, August 22, 2024 9:21 AM
To: debriere@floridahealthjustice.org
Cc: Andy Bardos <Andy.Bardos@gray-robinson.com>; Tim Moore, Jr. <tim.moore@gray-robinson.com>; Sarah Grusin <grusin@healthlaw.org>; Lynn Hearn <hearn@floridahealthjustice.org>; Miriam Heard <heard@healthlaw.org>; Miriam Harmatz <harmatz@floridahealthjustice.org>; Ronnie Graham <graham@floridahealthjustice.org>; Jerron Wheeler <wheeler@floridahealthjustice.org>; Amanda Avery <avery@healthlaw.org>
Subject: RE: Chianne D. v. Weida - Conferral

I apologize, Katy, I misspoke. The supplemental testimony would come from Laquetta Anderson—not Mr. Kallumkal.

From: Ashley Hoffman Lukis
Sent: Thursday, August 22, 2024 9:19 AM
To: debriere@floridahealthjustice.org
Cc: Andy Bardos <Andy.Bardos@gray-robinson.com>; Tim Moore, Jr. <tim.moore@gray-robinson.com>; Sarah Grusin <grusin@healthlaw.org>; Lynn Hearn <hearn@floridahealthjustice.org>; Miriam Heard <heard@healthlaw.org>; Miriam Harmatz <harmatz@floridahealthjustice.org>; Ronnie Graham <graham@floridahealthjustice.org>; Jerron Wheeler <wheeler@floridahealthjustice.org>; Amanda Avery <avery@healthlaw.org>
Subject: Chianne D. v. Weida - Conferral

Good morning Katy,

DCF plans to implement this Friday the change regarding reason code 241 that Mr. Kallumkal testified about at trial. The change should therefore be live in production on notices no later than Monday the 29th. Assuming the change is implemented on schedule, Defendants plan to file a motion to reopen the evidence for the purpose of having Mr. Kallumkal testify for the limited purpose of establishing the fact that the reason code 241 change he testified about during trial was effectuated as of April 29, 2024. We anticipate that this testimony would take only a few minutes. The motion will suggest that it can be accomplished via remote videoconference and of course note that Plaintiffs would have the opportunity to cross-examine Mr. Kallumkal within the scope of his direct. Can you please let us know Plaintiffs' position on this motion?

As an alternative, if Plaintiffs are agreeable, we could instead file a joint notice of stipulation setting forth this fact (similar to the stipulation filed after trial regarding the creation dates of the video exhibits, ECF No. 152), which would obviate the need for a motion and Mr. Kallumkal's supplemental testimony.

Let us know your thoughts, and if you would like to discuss.

Thanks!

Ashley

--

Sarah Grusin (she/her/hers)

Senior Attorney
National Health Law Program
1512 E. Franklin Street, Suite
110
Chapel Hill, NC 27514

grusin@healthlaw.org
healthlaw.org

Bar admissions: Illinois.
*Not admitted to practice in North
Carolina*

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to the Medicaid Program](#)



"Securing Health Rights for Those in Need"

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Sarah Grusin (she/her/hers)

Senior Attorney
National Health Law Program
1512 E. Franklin Street, Suite
110
Chapel Hill, NC 27514

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to the Medicaid Program](#)



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