

Exhibit A

Carl Charles

From: Altman, Jennifer <jennifer.altman@pillsburylaw.com>
Sent: Thursday, December 15, 2022 5:39 PM
To: Carl Charles
Subject: FW: Dekker

From: Michael Beato <mbeato@HoltzmanVogel.com>
Sent: Tuesday, December 13, 2022 6:18 PM
To: Altman, Jennifer <jennifer.altman@pillsburylaw.com>
Subject: RE: Dekker

Thanks, Jennifer. Have a nice night.

Michael Beato
Office: (850) 354-5645
mbeato@HoltzmanVogel.com // www.HoltzmanVogel.com



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From: Altman, Jennifer <jennifer.altman@pillsburylaw.com>
Sent: Tuesday, December 13, 2022 6:14 PM
To: Michael Beato <mbeato@HoltzmanVogel.com>
Subject: Dekker

I will get back to you tomorrow on your request.

Jennifer Altman | Partner
Pillsbury Winthrop Shaw Pittman LLP
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SILICON VALLEY TAIPEI TOKYO WASHINGTON, DC



Carl Charles

From: 'Altman, Jennifer' via FL Trans Care <FLtransCare@healthlaw.org>
Sent: Wednesday, December 14, 2022 9:39 AM
To: fltranscare@healthlaw.org
Subject: [FL Trans Care] FW: Dekker: Responses to Discovery

Jennifer Altman | Partner

Pillsbury Winthrop Shaw Pittman LLP
600 Brickell Avenue, Suite 3100 | Miami, FL 33131
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From: Altman, Jennifer
Sent: Wednesday, December 14, 2022 9:39 AM
To: Michael Beato <mbeato@HoltzmanVogel.com>
Subject: Dekker: Responses to Discovery

Michael,

Thank you for reaching out yesterday. Plaintiffs will agree to a reciprocal extension of the December 16discovery production deadline to January 3rd, 2023, on the following conditions:

1. Defendants agree to draft a joint motion to the Court that includes that Defendants solicited this extension, explains the good cause for so doing, and notes that Plaintiffs do not need such an extension but are agreeing to it in good faith and because of the upcoming holidays. The motion will also request to **extend all deadlines on the case schedule by two weeks**, including the closest possible two-week trial extension date if the Court cannot schedule trial to begin on May 23rd. We will promptly review the draft, provide limited edits, and ensure you can file by Friday (or sooner).
2. Defendants agree to accept service on behalf of the following witnesses: (1) Romina Brignardello-Petersen, PhD; (2) James Cantor, Ph.D.; (3) Quentin Van Meter, MD; (4) Patrick Lappert, MD; (5) Kevin Donovan, MD; (6) Michael Laidlaw, MD; (7) Andre Van Mol, MD; and (8) Miriam Grossman, MD. Please note that Dr. Brignardello-Petersen and Dr. Cantor live in Canada. Because AHCA relied on these two individuals to adopt the rule provision challenged here, we would expect AHCA to cooperate in the production of these witnesses and relevant documents.
3. Prompt response to our forthcoming motion for, and draft of, protective order so that we can file an agreed upon motion and PO no later than December 22.

Let me know if have any questions,

Jennifer

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Carl Charles

From: 'Altman, Jennifer' via FL Trans Care <FLtransCare@healthlaw.org>
Sent: Wednesday, December 14, 2022 10:17 AM
To: fltranscare@healthlaw.org
Subject: [FL Trans Care] FW: Dekker: Responses to Discovery

See below.

From: Michael Beato <mbeato@HoltzmanVogel.com>
Sent: Wednesday, December 14, 2022 10:11 AM
To: Altman, Jennifer <jennifer.altman@pillsburylaw.com>
Subject: RE: Dekker: Responses to Discovery

Thank you for the quick response, Jennifer.

I just note two things. First, for the Defendants, our deadline to respond to the Plaintiffs' first set of interrogatories and first request for production is Monday, December 19; we were served with the discovery on November 17, 2022 at 12:33 A.M. E.S.T. Thirty days from November 17 is December 17, which is a Saturday.

And second, we simply asked for a two-week discovery extension. It looks like we are just going to file a motion for an extension of time. If the Plaintiffs oppose, please let us know.

Michael Beato
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mbeato@HoltzmanVogel.com // www.HoltzmanVogel.com



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From: Altman, Jennifer <jennifer.altman@pillsburylaw.com>
Sent: Wednesday, December 14, 2022 9:39 AM
To: Michael Beato <mbeato@HoltzmanVogel.com>
Subject: Dekker: Responses to Discovery

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Thank you for reaching out yesterday. Plaintiffs will agree to a reciprocal extension of the December 16 discovery production deadline to January 3rd, 2023, on the following conditions:

1. Defendants agree to draft a joint motion to the Court that includes that Defendants solicited this extension, explains the good cause for so doing, and notes that Plaintiffs do not need such an extension but are agreeing to it in good faith and because of the upcoming holidays. The motion will also request to **extend all deadlines on the case schedule by two weeks**, including the closest possible two-week trial extension date if the Court cannot schedule trial to begin on May 23rd. We will promptly review the draft, provide limited edits, and ensure you can file by Friday (or sooner).
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3. Prompt response to our forthcoming motion for, and draft of, protective order so that we can file an agreed upon motion and PO no later than December 22.

Let me know if have any questions,

Jennifer

Jennifer Altman | Partner

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Carl Charles

From: Altman, Jennifer <jennifer.altman@pillsburylaw.com>
Sent: Thursday, December 15, 2022 5:36 PM
To: Carl Charles
Subject: FW: Dekker: Responses to Discovery

From: 'Altman, Jennifer' via FL Trans Care <FLtransCare@healthlaw.org>
Sent: Wednesday, December 14, 2022 12:48 PM
To: fltranscare@healthlaw.org
Cc: Garcia, Soraya M. <soraya.garcia@pillsburylaw.com>
Subject: [FL Trans Care] FW: Dekker: Responses to Discovery

From: Michael Beato <mbeato@HoltzmanVogel.com>
Sent: Wednesday, December 14, 2022 12:45 PM
To: Altman, Jennifer <jennifer.altman@pillsburylaw.com>
Subject: RE: Dekker: Responses to Discovery

Understood, Jennifer. I will attach this email chain to the motion, including this email, which will provide the court with an accurate account of what we discussed.

Michael Beato
Office: (850) 354-5645
mbeato@HoltzmanVogel.com // www.HoltzmanVogel.com



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From: Altman, Jennifer <jennifer.altman@pillsburylaw.com>
Sent: Wednesday, December 14, 2022 12:28 PM

To: Michael Beato <mbeato@HoltzmanVogel.com>

Subject: Dekker: Responses to Discovery

Michael,

We generally do not want to oppose requests for extension and are loathe to do so now, but unless we can agree on the other scheduling considerations we have no choice. Given the schedule we all agreed to, it will make the rest of the deadlines too tight. We hope you reconsider accepting our proposal, but if not, please accurately reflect in the motion our position vis-à-vis modifying the other deadlines.

jga

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