

From: [Tucci, Theodore](#)
To: [Paul E. Knag](#); [Csuka, Daniel](#); [Duffy, Conor O.](#)
Cc: [Boyle, Lisa M](#); [Lazarus, Steven](#); [McLaughlin, Yadira](#); [Faiella, Annaliese](#); [Julia Boisvert](#); [Manziona, Lara](#); [Casagrande, Antony](#)
Subject: RE: [EXTERNAL] Re: Docket No. 22-32511-CON, Petition for Intervenor Status of Save Sharon Hospital, Inc. and Howard Mortman, M.D.
Date: Friday, October 14, 2022 5:35:23 PM

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Dear Hearing Officer Csuka:

In an email sent this morning at 11:11 am, counsel for Proposed Intervenor's represented to OHS that they "will submit prefiled testimony with the reply [brief which they sought to file by October 17th at noon]. Below, Proposed Intervenor's take the position that they now should be allowed to have until Friday, October 21st to submit the same pre-filed testimony they said would be filed next Monday. Accordingly, we are already seeing evidence of impairment to the orderly conduct of these proceedings.

Conn. Gen. Stat. Section 4-177a(b) states in plain language that any person seeking status as an intervenor must submit a written petition to the agency "at least five days before the date of the hearing". The Proposed Intervenor's filed their petition on October 13th, five days before the legally noticed date for the hearing. A continuance of the hearing is purely a matter of procedure and conveys no substantive rights and certainly does not permit a "do-over" of an as-filed petition in order to materially alter the grounds on which intervenor status has been requested.

Respectfully submitted,

Ted Tucci
Lisa Boyle
Conor Duffy

From: Paul E. Knag <PKNAG@murthalaw.com>
Sent: Friday, October 14, 2022 5:13 PM
To: Csuka, Daniel <Daniel.Csuka@ct.gov>; Duffy, Conor O. <CDuffy@rc.com>; Tucci, Theodore <TTUCCI@RC.com>
Cc: Boyle, Lisa M <lboyle@RC.com>; Lazarus, Steven <Steven.Lazarus@ct.gov>; McLaughlin, Yadira <Yadira.McLaughlin@ct.gov>; Faiella, Annaliese <Annaliese.Faiella@ct.gov>; Julia Boisvert <jboisvert@murthalaw.com>; Manziona, Lara <Lara.Manziona@ct.gov>; Casagrande, Antony <Antony.Casagrande@ct.gov>
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Many in the community had been planning to testify on Tuesday and rescheduling will create issues for them. So we were prepared to proceed on Tuesday.

Nuvance delayed submitting its prefiled testimony with the Hearing Officer's consent and our non-opposition, and this put pressure on us to review such testimony and then submit our petition. We were not being "strategic" as we needed the time allotted in order to complete our petition. And because of such delay, we are still working on our prefile.

If the hearing is to be postponed, we request until Friday October 21 to file our prefiled testimony. This need not delay the rescheduled hearing date. In addition, if the Hospital is given until

Wednesday October 19 to submit its response to the petition (6 days from our filing), we would request until Tuesday, October 25 to respond. Counsel for Petitioner has another matter which will require his attention at the end of next week.

We are not presently planning any change to our petition but we do not believe that it would be appropriate to preclude change in advance. If the Hospital cites a deficiency that can be remedied we should not be precluded in advance from doing so.

PAUL E. KNAG | PARTNER

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From: Csuka, Daniel <Daniel.Csuka@ct.gov>

Sent: Friday, October 14, 2022 4:44 PM

To: Paul E. Knag <PKNAG@murthalaw.com>; Duffy, Conor O. <CDuffy@rc.com>; Tucci, Theodore <TTUCCI@RC.com>

Cc: Boyle, Lisa M <lboyle@RC.com>; Lazarus, Steven <Steven.Lazarus@ct.gov>; McLaughlin, Yadira <Yadira.McLaughlin@ct.gov>; Faiella, Annaliese <Annaliese.Faiella@ct.gov>; Julia Boisvert <jboisvert@murthalaw.com>; Manzione, Lara <Lara.Manzione@ct.gov>; Casagrande, Antony <Antony.Casagrande@ct.gov>

Subject: RE: [EXTERNAL] Re: Docket No. 22-32511-CON, Petition for Intervenor Status of Save Sharon Hospital, Inc. and Howard Mortman, M.D.

Will do. No rush.

Daniel J. Csuka, Esq. (he/him/his)

Staff Attorney / Hearing Officer

Office of Health Strategy

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From: Paul E. Knag <PKNAG@murthalaw.com>

Sent: Friday, October 14, 2022 4:40 PM

To: Csuka, Daniel <Daniel.Csuka@ct.gov>; Duffy, Conor O. <CDuffy@rc.com>; Tucci, Theodore <TTUCCI@RC.com>

Cc: Boyle, Lisa M <lboyle@RC.com>; Lazarus, Steven <Steven.Lazarus@ct.gov>; McLaughlin, Yadira <Yadira.McLaughlin@ct.gov>; Faiella, Annaliese <Annaliese.Faiella@ct.gov>; Julia Boisvert <jboisvert@murthalaw.com>; Manzione, Lara <Lara.Manzione@ct.gov>; Casagrande, Antony <Antony.Casagrande@ct.gov>

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Please give me a few minutes to finish an email I am planning to send you.

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From: Csuka, Daniel <Daniel.Csuka@ct.gov>

Sent: Friday, October 14, 2022 4:38 PM

To: Duffy, Conor O. <CDuffy@rc.com>; Tucci, Theodore <TTUCCI@RC.com>; Paul E. Knag <PKNAG@murthalaw.com>

Cc: Boyle, Lisa M <lboyle@RC.com>; Lazarus, Steven <Steven.Lazarus@ct.gov>; McLaughlin, Yadira <Yadira.McLaughlin@ct.gov>; Faiella, Annaliese <Annaliese.Faiella@ct.gov>; Julia Boisvert <jboisvert@murthalaw.com>; Manzione, Lara <Lara.Manzione@ct.gov>; Casagrande, Antony

<Antony.Casagrande@ct.gov>

Subject: RE: [EXTERNAL] Re: Docket No. 22-32511-CON, Petition for Intervenor Status of Save Sharon Hospital, Inc. and Howard Mortman, M.D.

I will issue an order shortly. I think the briefing schedule that has been proposed should be fine. In the meantime, the Applicant can ignore today's 5:00 PM deadline that was set for responding to the Petitioners' filing. Several staff members from my office are out today so I am not in a position to schedule a new date, but that can be addressed separately early next week. The rest of your suggestions are duly noted and may be included in some fashion in the order. Thank you.

Daniel J. Csuka, Esq. (he/him/his)

Staff Attorney / Hearing Officer

Office of Health Strategy

Mailing Address: 450 Capitol Avenue, MS#51OHS, P.O. Box 340308, Hartford, CT 06134-0308

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From: Duffy, Conor O. <CDuffy@rc.com>

Sent: Friday, October 14, 2022 4:13 PM

To: Csuka, Daniel <Daniel.Csuka@ct.gov>; Tucci, Theodore <TTUCCI@RC.com>; Paul E. Knag <PKNAG@murthalaw.com>

Cc: Boyle, Lisa M <lboyle@RC.com>; Lazarus, Steven <Steven.Lazarus@ct.gov>; McLaughlin, Yadira <Yadira.McLaughlin@ct.gov>; Faiella, Annaliese <Annaliese.Faiella@ct.gov>; Julia Boisvert <jboisvert@murthalaw.com>; Manzione, Lara <Lara.Manzione@ct.gov>; Casagrande, Antony <Antony.Casagrande@ct.gov>

Subject: RE: [EXTERNAL] Re: Docket No. 22-32511-CON, Petition for Intervenor Status of Save Sharon Hospital, Inc. and Howard Mortman, M.D.

Importance: High

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Dear Hearing Officer Csuka:

On behalf of our client, Vassar Brother Connecticut, Inc., d/b/a Sharon Hospital ("Sharon Hospital"), we appreciate your careful consideration of and attention to this matter as it pertains to both the substantive issues involved, as well as the process and procedure that will govern the public hearing.

Sharon Hospital's goal has been and remains to have a complete, fair and orderly consideration of the CON Application concerning labor and delivery services at the Hospital. To that end, Sharon Hospital has been preparing diligently for the upcoming public hearing for months and more than 15 people (including practicing physicians providing care to patients) cleared schedules in order to participate in the hearing scheduled for October 18th. The Proposed Intervenor made a strategic choice not to include pre-filed testimony with their joint intervenor petition, and from Sharon Hospital's perspective this has resulted in the apparent need to postpone the public hearing.

Because of the approach taken by the proposed intervenors, Sharon Hospital understands your desire to put in place a schedule and impose requirements that will allow you to reach a full and reasoned conclusion regarding intervenor status. However, as the Applicant, Sharon Hospital is also concerned about potential prejudice should there be any extended delay in scheduling a new public hearing date. Accordingly, if the hearing is continued, Sharon Hospital respectfully offers the following suggestions for your consideration in managing this process going forward. First, Proposed Intervenor should still be required to produce pre-filed written testimony by no later than October 17th at noon. Sharon Hospital will file its objection to the Intervenor Petition and pre-filed testimony by October 19th at 5 pm. If the Hearing Officer decides to permit a reply, the Proposed Intervenor should be required to file such reply by Friday October 21st at 12 pm. The Intervenor Petition would then be ripe for written decision at your soonest convenience thereafter. With respect to any such reply, Sharon Hospital requests that the Hearing Officer not permit Proposed Intervenor to change, alter or amend any grounds for seeking intervenor status or to otherwise alter the substance of their Intervenor Petition, which is already on file with OHS as a matter of record. Second, with respect to the hearing, Sharon Hospital requests that the hearing be rescheduled to the earliest practicable date this year, considering any public notice requirements that must be met or availability considerations of key witnesses for the Applicant.

Thank you in advance for your attention to and consideration of Sharon Hospital's position.

Respectfully submitted,

Ted Tucci
Lisa Boyle
Conor Duffy

From: Csuka, Daniel <Daniel.Csuka@ct.gov>
Sent: Friday, October 14, 2022 2:00 PM
To: Tucci, Theodore <TTUCCI@RC.com>; Paul E. Knag <PKNAG@murthalaw.com>
Cc: Duffy, Conor O. <CDuffy@rc.com>; Boyle, Lisa M <lboyle@RC.com>; Lazarus, Steven <Steven.Lazarus@ct.gov>; McLaughlin, Yadira <Yadira.McLaughlin@ct.gov>; Faiella, Annaliese <Annaliese.Faiella@ct.gov>; Julia Boisvert <jboisvert@murthalaw.com>; Manzione, Lara <Lara.Manzione@ct.gov>; Casagrande, Antony <Antony.Casagrande@ct.gov>
Subject: RE: [EXTERNAL] Re: Docket No. 22-32511-CON, Petition for Intervenor Status of Save Sharon Hospital, Inc. and Howard Mortman, M.D.

Counsel:

Given the scope and volume of what has been filed by both the Applicant and the proposed intervenors in the past few days, and what I am expecting may be filed in the coming days, along with the nature and gravity of the application itself, I am planning to continue the hearing. Along with that, I would order that the petitioners file their proposed pre-file testimony by a date certain, followed by giving the Applicant a fair and adequate amount of time to prepare a response to both the petition and the petitioners' pre-file. It would also provide me with more time so that I may fully

consider the information and arguments for and against letting in the petitioners and, if they do come in, how I might want to limit the scope of their participation.

Please let me know if you have any thoughts or objections to this, otherwise I will plan to move forward with rescheduling. Thank you.

Daniel J. Csuka, Esq. (he/him/his)

Staff Attorney / Hearing Officer

Office of Health Strategy

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Physical Address: 450 Capitol Avenue, 1st Floor, Hartford, CT 06106

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Email: daniel.csuka@ct.gov

From: Tucci, Theodore <TTUCCI@RC.com>

Sent: Friday, October 14, 2022 11:32 AM

To: Paul E. Knag <PKNAG@murthalaw.com>; Csuka, Daniel <Daniel.Csuka@ct.gov>

Cc: Duffy, Conor O. <CDuffy@rc.com>; Boyle, Lisa M <lboyle@RC.com>; Lazarus, Steven <Steven.Lazarus@ct.gov>; McLaughlin, Yadira <Yadira.McLaughlin@ct.gov>; Faiella, Annaliese <Annaliese.Faiella@ct.gov>; Julia Boisvert <jboisvert@murthalaw.com>

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Dear Hearing Officer Csuka:

For the sake of clarity, Sharon Hospital's objection is to Petitioner's request to submit any reply brief, regardless of the timing or what may or may not accompany it.

The Petitioner is not entitled to a reply brief as a matter of right. This is purely a question that falls within the discretion of the Hearing Officer based on maintaining an orderly and fair process for the hearing. This matter will be ripe for decision by no later than 5 pm today when Sharon Hospital submits its Opposition. Petitioner made the strategic choice regarding the content and nature of its Petition as-filed and should not be permitted to disrupt the process by requesting further opportunity to make submissions less than 24 hours before the public hearing commences.

Respectfully submitted,

Ted Tucci

From: Paul E. Knag <PKNAG@murthalaw.com>

Sent: Friday, October 14, 2022 11:11 AM

To: Tucci, Theodore <TTUCCI@RC.com>; Csuka, Daniel <Daniel.Csuka@ct.gov>

Cc: Duffy, Conor O. <CDuffy@rc.com>; Boyle, Lisa M <lboyle@RC.com>; Lazarus, Steven <Steven.Lazarus@ct.gov>; McLaughlin, Yadira <Yadira.McLaughlin@ct.gov>; Faiella, Annaliese <Annaliese.Faiella@ct.gov>; Julia Boisvert <jboisvert@murthalaw.com>

Subject: Re: [EXTERNAL] Re: Docket No. 22-32511-CON, Petition for Intervenor Status of Save Sharon Hospital, Inc. and Howard Mortman, M.D.

We will submit prefiled testimony with the reply.

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From: Tucci, Theodore <TTUCCI@RC.com>

Sent: Friday, October 14, 2022 11:09:51 AM

To: Csuka, Daniel <Daniel.Csuka@ct.gov>

Cc: Duffy, Conor O. <CDuffy@rc.com>; Boyle, Lisa M <lboyle@RC.com>; Lazarus, Steven <Steven.Lazarus@ct.gov>; McLaughlin, Yadira <Yadira.McLaughlin@ct.gov>; Faiella, Annaliese <Annaliese.Faiella@ct.gov>; Julia Boisvert <jboisvert@murthalaw.com>; Paul E. Knag <PKNAG@murthalaw.com>

Subject: RE: [EXTERNAL] Re: Docket No. 22-32511-CON, Petition for Intervenor Status of Save Sharon Hospital, Inc. and Howard Mortman, M.D.

Dear Hearing Officer Csuka:

The Applicant, Vassar Brothers Connecticut, Inc., d/b/a Sharon Hospital hereby objects to Petitioners' request to submit a reply brief to Sharon Hospital's Opposition.

In its Intervenor Petition, Petitioners state at page 19 that "[i]f granted intervenor status, each intervenor requests permission to submit pre-filed testimony to OHS in advance of the hearing in accordance with a schedule to be determined by OHS."

If Petitioner's request for submission of a reply brief by noon on October 17th is granted, the end result will be that the Hearing Officer will not be in a position to decide the matter until sometime later in the day, after which Petitioners would then submit written pre-file testimony. This would mean that such written testimony would not be available to Sharon Hospital until the night before the public hearing,

which is highly prejudicial. This is a problem of Petitioner's own making because they chose not to submit pre-filed testimony as part of their October 13th Petition.

Respectfully submitted,

Ted Tucci

From: Paul E. Knag <PKNAG@murthalaw.com>

Sent: Friday, October 14, 2022 10:56 AM

To: Csuka, Daniel <Daniel.Csuka@ct.gov>

Cc: Tucci, Theodore <TTUCCI@RC.com>; Duffy, Conor O. <CDuffy@rc.com>; Boyle, Lisa M <lboyle@RC.com>; Lazarus, Steven <Steven.Lazarus@ct.gov>; McLaughlin, Yadira <Yadira.McLaughlin@ct.gov>; Faiella, Annaliese <Annaliese.Faiella@ct.gov>; Julia Boisvert <jboisvert@murthalaw.com>

Subject: Re: [EXTERNAL] Re: Docket No. 22-32511-CON, Petition for Intervenor Status of Save Sharon Hospital, Inc. and Howard Mortman, M.D.

We'd like until Monday noon to file a reply.

Sent from my iPhone

PAUL E. KNAG | PARTNER

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On Oct 13, 2022, at 5:59 PM, Csuka, Daniel <Daniel.Csuka@ct.gov> wrote:

Thank you. Tomorrow by 5:00 works for me. Have a good evening, everyone.

Daniel J. Csuka, Esq.

Staff Attorney / Hearing Officer

Office of Health Strategy

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From: Tucci, Theodore <TTUCCI@RC.com>

Sent: Thursday, October 13, 2022 5:02:52 PM

To: Csuka, Daniel <Daniel.Csuka@ct.gov>

Cc: Paul E. Knag <PKNAG@murthalaw.com>; Duffy, Conor O. <CDuffy@rc.com>; Boyle, Lisa M <lboyle@RC.com>; Lazarus, Steven <Steven.Lazarus@ct.gov>; McLaughlin, Yadira <Yadira.McLaughlin@ct.gov>; Faiella, Annaliese <Annaliese.Faiella@ct.gov>; jboisvert@murthalaw.com <jboisvert@murthalaw.com>

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Dear Hearing Officer Csuka:

The Applicant, Vassar Brothers Connecticut, Inc., d/b/a Sharon Hospital ("Sharon Hospital") is in receipt of the 21 page Petition for Intervenor Status on behalf of Save Sharon Hospital, Inc. and Howard Mortman, MD ("Proposed Intervenor"), accompanied by approximately 200 pages of documents.

Sharon Hospital intends to object to the Petition submitted by the Proposed Intervenor on multiple legal and factual grounds. In light of the importance of this issue to the orderly hearing process and the large volume of material submitted, Sharon Hospital respectfully requests until 5 pm on October 14th to submit its opposition to the request by the Proposed Intervenor.

Thank you for your attention to this request.

Ted Tucci

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