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July 23, 2026

VIA ECF

Hon. Judith C. McCarthy
United States Magistrate Judge
United States District Court
Southern District of New York
300 Quarropas St.
White Plains, NY 10601

Re: *U.S.* et rel. *Integra Med Analytics LLC v. Laufer,* et al., No. 17-cv-9424

Dear Judge McCarthy:

On behalf of defendants in this action, we write to notify the Court that, due to circumstances beyond their control, defendants are unable to complete production of the 382 patient records ordered produced by the Court in its May 6 Order by the court-ordered deadline of August 3, 2026, the end date for document discovery in this case. Defendants have started producing these records on a rolling basis and anticipate producing well over 200 of such records by the deadline. Despite best efforts, however, additional time is needed to finish production of the balance of the records.

After the Court ordered the production, defendant Paragon coordinated efforts to locate these records from the various defendant Facilities, many of which records are from 2010 and 2011 – over fifteen years ago. Defendants have multiple storage sites for medical records, including each of the eleven Facilities' building storage areas and three off-site storage units at warehouse locations that contain approximately 10,000 boxes of records, with each box containing multiple patient records. Paragon assigned one of its full-time employees to oversee the search for and production of these records, and a team of employees (eleven in total) has been working diligently to locate, and then scan and upload these files, which is a time-intensive process.

We advised plaintiff's counsel of this timing issue and will confer with counsel before the July 31 court conference about the additional time needed or possible alternatives. We bring this matter to the Court's attention now, however, because, despite acting in good faith to meet the court-ordered deadline, defendants are unable to make the complete production of these records by that deadline.

Respectfully submitted,

/s/ Michael Paul Bowen
Michael Paul Bowen