

CAUSE NO. DC-22-08056

KEN CARLSEN and MARY VASQUEZ,	:	IN THE DISTRICT COURT OF
on behalf of themselves and on behalf of all others	:	
similarly situated,	:	
	:	
Plaintiffs,	:	
	:	DALLAS COUNTY, TEXAS
v.	:	
	:	
TENET HEALTHCARE CORPORATION,	:	
and VHS SAN ANTONIO PARTNERS, L.L.C.,	:	
dba Baptist Health System,	:	
	:	
Defendants.	:	14th JUDICIAL DISTRICT

CAUSE NO. DC-22-08226

AIMEE LADNER, individually and as natural	:	IN THE DISTRICT COURT OF
parent and next friend of E.W., a minor, and	:	
ELIZABETH LADNER, individually and on	:	
behalf of all others similarly situated	:	
	:	
Plaintiffs,	:	
	:	DALLAS COUNTY, TEXAS
v.	:	
	:	
TENET HEALTHCARE CORPORATION,	:	
VHS SAN ANTONIO PARTNERS LLC	:	
d/b/a BAPTIST HEALTH SYSTEM, and	:	
RESOLUTE HOSPITAL COMPANY, LLC	:	
d/b/a RESOLUTE HEALTH HOSPITAL	:	
	:	
Defendants.	:	193rd JUDICIAL DISTRICT

[PROPOSED] ORDER CONSOLIDATING ACTIONS

Plaintiffs' Unopposed Motion to Transfer and Consolidate Cases having been read and considered, and it appearing to the Court that there are common questions of law and fact and that consolidation will avoid expense and delay for good cause shown, the Court hereby GRANTS the Motion and ORDERS the following:

1. *Contreras v. Tenet Healthcare Corporation and VHS San Antonio Partners LLC, d/b/a Baptist Health System*, No. DC-22-07513, filed July 5, is hereby consolidated with *Aimee Ladner and Elizabeth Ladner v. Tenet Healthcare Corporation, VHS San Antonio Partners LLC d/b/a Baptist Health System, and Resolute Hospital Company, LLC d/b/a Resolute Health Hospital*, No. DC-22-08226, filed July 19, 2022 in the 193rd Judicial District (hereafter the “*Ladner Action*”), *Burrell v. Tenet Healthcare Corporation*, No. DC-22-07963, filed on July 12, 2022 in the 14th Judicial District (hereinafter, the “*Burrell Action*”), 2022, *Ken Carlson and Mary Vasquez v. Tenet Healthcare Corporation and VHS San Antonio Partners, L.L.C. dba Baptist Health System*, No. DC-22-08056, filed July 13, 2022 in the 14th Judicial District Court (hereafter the “*Carlson Action*”), *Charles Earley v. Tenet Healthcare Corporation and VHS San Antonio Partners, LLC, dba Baptist Health System*, No. DC-22-07885, filed July 11, 2022 in the 160th Judicial District (hereinafter, the “*Earley Action*”), and *Lopez v. Tenet Healthcare Corporation and VHS San Antonio Partners, LLC d/b/a Baptist Health System*, Case No. DC-22-07814, filed on July 11, 2022 in the 160th Judicial District (hereinafter, the “*Lopez Action*”) for all purposes.

2. Thereafter, the *Ladner, Burrell, Carlson, Earley, and Lopez* Actions will be administratively closed and will proceed under No. DC-22-07513 as a consolidated action with the *Contreras v. Tenet Healthcare Corporation*.

3. All papers filed in the Consolidated Action shall be filed under Case No. DC-22-07513 and shall bear the following caption:

4. Each new case that arises out of the subject matter of the *Contreras* consolidated Action which is filed in this Court or transferred to this Court, shall be consolidated with the *Contreras* Action and this Order shall apply thereto, unless a party objects to consolidation, as provided for herein, or any provision of this Order, within ten (10) days after the date upon which a copy of this Order is served on counsel for such party, by filing an application for relief and this Court deems it appropriate to grant such application. Nothing in the forgoing shall be construed as a waiver of Defendant's right to object to consolidation of any subsequently-filed or transferred related action;

5. Any motions for appointment of interim class counsel shall be filed within fourteen (14) days after the entry of this Order. No response briefs shall be accepted;

6. Plaintiffs shall file a consolidated amended complaint within thirty (30) days of the Court's entry of an Order appointing interim class counsel; and,

7. Defendants shall have 30 days from the filing of the consolidated amended complaint to answer or otherwise respond to the consolidated amended complaint, and Defendants' deadline to file a motion to dismiss under Rule 91a of the Texas Rules of Civil Procedure shall be 30 days from the filing of the consolidated amended complaint. If Defendants file a Rule 91a motion, Plaintiffs' opposition shall be due 30 days from the filing of the motion, and Defendants shall then have 21 days to file a reply in support. Any hearing on a Rule 91a motion shall not be set until after Defendants file a reply in support. All parties agree that compliance with these

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