

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

TERESA HEARTSILL,)	
)	
Plaintiff,)	
)	4:17-CV-00155-ERW
v.)	
)	
ASCENSION HEALTH ALLIANCE)	
<i>et al.</i>)	
Defendants.)	

PLAINTIFF’S MOTION FOR LIMITED DISCOVERY

COMES NOW Plaintiff, and for her Motion for Limited Discovery, states as follows:

Plaintiff seeks to take very limited discovery in this case, specifically Plaintiff seeks written discovery to obtain a copy of written instruments governing the administration of relevant documents that should have been included in the “Administrative Record,” but were omitted specifically the Administrative Services Agreement (“ASO”) between the Defendants and Defendants’ claim and procedural manuals, and a corporate representative deposition to determine the extent of Defendants conflict of interest.

In addition, Plaintiff seeks to subpoena documents from the Defendants’ third party vendor Dane Street and a corporate representative deposition(s) of Dane Street to explore a procedural irregularity in Dane Street’s process of obtaining and editing reports from “Independent Physician Reviewers” relied upon by Defendants in denying plaintiff’s claim for benefits.

WHEREFORE, for the reasons set forth more fully in Plaintiff’s Memorandum in Support of this Motion, Plaintiff prays that the Court enter an Order allowing limited discovery and for whatever further relief is just and necessary.

GALLAGHER DAVIS, L.L.P.

/s/ Matthew R. Davis

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CERTIFICATE OF SERVICE

I certify that on June 6, 2017 this document was served on all counsel of record via the Court's electronic filing system.

/s/ Matthew R. Davis