UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS, HOUSTON DIVISION

ELECTRICAL MEDICAL TRUST, et al., Plaintiffs, v. U.S. ANESTHESIA PARTNERS, INC., et al. Defendants.	Case No. 4:23-cv-04398

NOTICE OF SETTLEMENT

Pursuant to Rule B.6 of the Court's Procedures and Practices, the Parties in the above-captioned action, by and through their undersigned counsel, hereby notify the Court that Plaintiffs Electrical Medical Trust and Plumbers Local Union No. 68 Welfare Fund, and Defendants U.S. Anesthesia Partners, Inc., U.S. Anesthesia Partners of Texas, P.A., and U.S. Anesthesia Partners Holdings, Inc. have reached a settlement in principle that resolves the claims in this action, subject to the completion of a final settlement agreement. The Parties are currently in the process of drafting, finalizing, and executing a formal, written settlement agreement. The Parties respectfully request that the Court vacate the Scheduling Order (Dkt. No. 243) and stay this case only so that the Parties may complete the settlement agreement and file a motion for preliminary approval of the settlement. A stay will conserve the resources of the Court and the Parties, including by avoiding the expense of further expert discovery, and will not prejudice any Party.

Nothing in this Notice, or in the Parties' settlement discussions, is intended to waive or otherwise prejudice any right, claim, defense, or argument of any Party to this action. Neither this Notice, nor the Parties' settlement discussions, constitutes, or may be construed as, an admission by any Party of any liability, fact, or issue, or an admission or concession that class certification is

appropriate, and all such negotiations and communications are subject to Federal Rule of Evidence 408.

The Parties expressly reserve all rights in the event the settlement is not finalized, executed, or approved, or is otherwise terminated, including, but not limited to, the right to submit rebuttal and reply expert reports. In that event, the Parties will notify the Court and submit a proposed schedule for the resumption of the stayed deadlines, including those governing expert discovery.

This settlement does not involve any claim against Defendants made by the Plaintiff Christy Burbage in the related action styled as *Christy Burbage v. U.S. Anesthesia Partners, Inc., et al.*, Case No. 4:25-cv-116. A Notice of Settlement has been filed separately in that action.

Accordingly, the Parties respectfully request that the Court stay all pending deadlines only in the above-captioned action for sixty (60) days from the date of filing of this Notice. The Parties will provide a status update to the Court by December 1, 2026 if Plaintiffs have not filed a motion for preliminary approval of class action settlement prior to that time.

Dated: October 30, 2026

By: */s/ Brendan P. Glackin*

Brendan P. Glackin (CA Bar No. 199643) (pro hac vice)
Attorney-In-Charge
Lin Y. Chan (CA Bar No. 255027) (pro hac vice)
Nimish Desai (TX Bar No. 24105238, S.D. Tex. Bar No. 3370303)
Rebecca P. Chang (NY Bar No. 5493028) (pro hac vice)
Jules A. Ross (CA Bar No. 348368) (pro hac vice)
Benjamin A. Trouvais (CA Bar No. 353034) (pro hac vice)

By: */s/ Julianne Jaquith*

Karl S. Stern (TX Bar No. 19175665)
(Federal I.D. No. 04870)
Christopher D. Porter (TX Bar No. 24070437)
(Federal I.D. No. 1052367)
Julianne Jaquith (TX Bar No. 24134925)
(Federal I.D. No. 3921126)
Melanie Guzman (TX Bar No. 24117175)
(Federal I.D. No. 3745044)
QUINN EMANUEL URQUHART & SULLIVAN, LLP
700 Louisiana St., Suite 3900
Houston, TX 77002
Tel: (713) 221-7000
Fax: (713) 221-7100

LIEFF CABRASER HEIMANN & BERNSTEIN, LLP
275 Battery Street, 29th Floor
San Francisco, CA 94111-3339
Phone: (415) 956-1000
Fax: (415) 956-1008
bglackin@lchb.com
lchan@lchb.com
ndesai@lchb.com
rchang@lchb.com
jross@lchb.com
btrouvais@lchb.com

Counsel for Plaintiffs and the Proposed Class

karlstern@quinnemanuel.com
chrisporter@quinnemanuel.com
juliannejaquith@quinnemanuel.com
melanieguzman@quinnemanuel.com

David B. Hennes (*pro hac vice*)
Noah B. Yavitz (*pro hac vice forthcoming*)
ROPES & GRAY LLP
1211 Avenue of the Americas
New York, NY 10036
Tel.: (212) 596-9000
Fax: (212) 596-9090
David.Hennes@ropesgray.com
Noah.Yavitz@ropesgray.com

Geoffrey M. Klineberg (D.C. Bar No. 444503) (*pro hac vice*)
Attorney-in-Charge
Kenneth M. Fetterman (D.C. Bar No. 474220) (*pro hac vice*)
Bradley E. Oppenheimer (D.C. Bar No. 1025006) (*pro hac vice*)
KELLOGG, HANSEN, TODD, FIGEL & FREDERICK, P.L.L.C.
1615 M Street N.W., Suite 400
Washington, D.C. 20036
Tel: (202) 326-7900
Fax: (202) 326-7999
gklineberg@kellogghansen.com
kfetterman@kellogghansen.com
boppenheimer@kellogghansen.com

Counsel for Defendants U.S. Anesthesia Partners Inc., U.S. Anesthesia Partners of Texas, P.A., and U.S. Anesthesia Partners Holdings, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of October 2026, I caused to be filed the foregoing Notice of Settlement with the Court through ECF filing, which caused a copy to be sent to all counsel of record.

DATED: October 30, 2026 */s/ Julianne Jaquith*