

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

Joseph Lovera,	)	
	)	
<i>Plaintiff</i>	)	
	)	No. 21-cv-06837
-vs-	)	
	)	Jury Demand
Wexford Health Sources, Inc., and	)	
Dr. Kul Sood, Dr. Marlene Henze,	)	Judge Martha Pacold
and Dr. Kurt Osmundson,	)	Magistrate Judge Gabriel Fuentes
	)	
<i>Defendants.</i>	)	

**UNOPPOSED MOTION TO STAY DEFENDANTS' ANSWERS TO  
PLAINTIFF'S SECOND AMENDED COMPLAINT AT LAW**

NOW COME the Defendants, WEXFORD HEALTH SOURCES, INC., DR. KUL SOOD, DR. MARLENE HENZE and DR. KURT OSMUNDSON, by and through their attorneys, CONNOLLY KRAUSE LLC, and hereby move this Honorable Court to stay the Defendants' answers to Plaintiff's Second Amended Complaint at Law and in support state as follows:

1. Plaintiff, JOSEPH LOVERA, filed his operative Second Amended Complaint on September 13, 2022. (ECF #30).
2. On March 25, 2024, Plaintiff's counsel advised Defendants that they had been unable to reach their client, Joseph Lovera, and after an Internet search revealing an obituary indicating that Joseph Lovera had passed away, they filed an Agreed Motion to Extend Time to File, (ECF #51), for the Magistrate Judge assigned to this matter, Judge Gabriel Fuentes.
3. In said Agreed Motion to Extend time to File the joint status report, Plaintiff and Defendants agreed to request the Court to stay the Defendants' answers to Plaintiff's operative Second Amended Complaint pending confirmation that Mr. Lovera had passed away. (ECF #51).

4. As the parties are unsure whether or not Mr. Lovera is alive at this point and based on the aforementioned Agreed Motion and investigation by Plaintiff's counsel has indicated that Mr. Lovera is deceased, and until such time that a suggestion of death has been filed with the Court and a substitution of party has been made, there is no Plaintiff currently a party to this case.

5. Accordingly, the Defendants respectfully request this Court stay their answers to the operative Second Amended Complaint until such time that the proper party has been substituted for the Plaintiff.

6. Defendants have contacted Plaintiff's counsel regarding this motion, and Plaintiff's counsel does not oppose this motion.

WHEREFORE, Defendants, WEXFORD HEALTH SOURCES, INC., DR. KUL SOOD, DR. MARLENE HENZE and DR. KURT OSMUNDSON, respectfully request the entry of an order staying the Defendants' answers to the operative Second Amended Complaint.

Respectfully Submitted,

By: /s/ Victor F. Price  
*One of the Attorneys for Defendants*

Robert Tengesdal (#6288650)  
Victor F. Price (#6313766)  
CONNOLLY KRAUSE LLC  
500 West Madison Street – Suite 3900  
Chicago, Illinois 60661  
Phone: (312) 253-6200  
Email(s): [rtengesdal@cktrials.com](mailto:rtengesdal@cktrials.com)  
[yprice@cktrials.com](mailto:yprice@cktrials.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on the date set forth below, I caused the foregoing document to be filed electronically with the Clerk of the Court through ECF and served on all counsel of record.

Dated: March 28, 2024

By: /s/ Victor F. Price