IN THE SUPERIOR COURT FOR THE STATE OF DELAWARE

RISEDELAWARE INC., et al.,	:	
Plaintiffs,	: :	
v.	•	C.A. No. N22C-09-526-CLS
SECRETARY CLAIRE DEMATTEIS in	:	
her official capacity as Secretary of the	:	
Delaware Department of Human	:	
Resources and Co-Chair of the State	:	
Employee Benefits Committee, et al.,	:	
	:	
Defendants.	:	

PLAINTIFFS' MOTION TO STAY

Pursuant to 29 *Del. C.* § 10144, Plaintiffs present their motion to stay Defendants' implementation of the new Highmark Medicare Advantage Plan for State retirees and the open enrollment period currently in effect for State retirees. The bases supporting Plaintiffs' motion are set forth in the opening brief filed contemporaneously herewith. Dated: October 4, 2022

Of Counsel:

Steve Cohen Sara Haviva Mark Pollock Cohen LLP 111 Broadway, Suite 1804 New York, New York 10006 Telephone: (212) 337-5361

Jacob S. Gardener Walden Macht & Haran LLP 250 Vesey Street, 27th floor New York, New York 10281 Telephone: (212) 335-2030 /s/ David A. Felice

David A. Felice (#4090) Bailey & Glasser, LLP Red Clay Center at Little Falls 2961 Centerville Road, Suite 302 Wilmington, Delaware 19808 Telephone: (302) 504-6333 Facsimile: (302) 504-6334

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on October 4, 2022, I caused a true and correct copy of

the foregoing *Plaintiffs' Motion to Stay* to be served by File & ServeXpress upon

the following counsel of record:

Jennifer Singh, Esq. Adria Martinelli, Esq. Patricia DavisEsq. Department of Justice Carvel State Office Building 820 N. French Street, 6th Floor Wilmington, DE 19801

Dated: October 4, 2022

/s/ David A. Felice

David A. Felice (#4090) BAILEY & GLASSER LLP