

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION**

MED-TRANS CORPORATION,

Plaintiff,

v.

**CAPITAL HEALTH PLAN, INC.
and C2C INNOVATIVE
SOLUTIONS, INC.**

Defendant.

Case No. 3:22-cv-1077-TJC-JBT

**REACH AIR MEDICAL SERVICES
LLC,**

Plaintiff,

v.

**KAISER FOUNDATION HEALTH
PLAN INC. and C2C INNOVATIVE
SOLUTIONS, INC.**

Defendant.

Case No. 3:22-cv-1153-TJC-JBT

**MED-TRANS CORPORATION AND
REACH AIR MEDICAL SERVICES LLC'S
NOTICE OF INTENT TO STAND ON EXISTING COMPLAINTS**

Plaintiffs Med-Trans Corporation (“Med-Trans”) and REACH Air Medical Services LLC (“REACH”) (collectively “Plaintiffs”) file this Notice of Intent to Stand on Existing Complaints and would respectfully show the Court as follows:

Plaintiffs have reviewed this Court's Order dated November 1, 2023 (3:23-cv-1077, Doc. 65 and 3:23-cv-1153, Doc. 64). While the Court has provided Plaintiffs with an opportunity to replead, Plaintiffs believe their complaints adequately allege claims warranting denial of the motions to dismiss filed by Defendants in the above captioned matters. Accordingly, Plaintiffs hereby disclaim leave to amend and request that the Court enter final orders in the above captioned proceedings. *See Hagan v. Rogers*, 570 F.3d 146, 151 (3d. Cir. 2009) (noting a Plaintiff may elect to stand on a complaint dismissed without prejudice for purposes of finality and appeal).

For the reasons stated above, Plaintiffs respectfully request that this Court enter final orders in the above captioned proceedings.

Dated: November 3, 2023

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Respectfully submitted,

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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I certify that on November 3, 2023, a true and correct copy of the foregoing was served via the Court's ECF system on all counsel of record.

/s/ Adam T. Schramek
Adam T. Schramek