## UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA JACKSONVILLE DIVISION

Med-Trans Corporation,

Plaintiff,

v.

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

Capital Health Plan, Inc. and C2C Innovative Solutions, Inc.,

Defendants.

REACH Air Medical Services, LLC,

Plaintiff,

v.

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

Kaiser Foundation Health Plan Inc. and C2C Innovative Solutions, Inc.,

Defendants.

# **JOINT STATUS REPORT**

The parties in the above-captioned cases are in receipt of the Court's order of July 24, 2023, directing a jointly filed status report on whether settlement is likely. Case No. 3:22-cv-1153, Dkt. No. 59; Case No. 3:22-cv-1077, Dkt. No. 61. The parties hereby report that no settlement discussions have occurred or are currently expected between Plaintiffs and Kaiser. It is possible that Capital Health and Plaintiffs may resolve their dispute but any such resolution is not imminent.

### Respectfully submitted,

#### NORTON ROSE FULBRIGHT US LLP

By: /s/Adam Schramek

ADAM T. SCHRAMEK
Texas Bar No. 24033045 (pro hac vice)
ABRAHAM CHANG
Texas Bar. No. 24102827 (pro hac vice)
98 San Jacinto Blvd Ste 1100
Austin, TX 78701
Telephone: 512-536-5232
adam.schramek@nortonrosefulbright.com

abraham.chang@nortonrosefulbright.com

Attorneys for Plaintiff
REACH AIR MEDICAL SERVICES. LLC

### SHEPPARD MULLIN RICHTER & HAMPTON LLP

By:/s/ Moe Keshavarzi

MOE KESHAVARZI
Cal. Bar No. 223759 (pro hac vice)
JOHN F. BURNS
Cal. Bar No. 290523 (pro hac vice)
MEGAN MCKISSON
Cal. Bar. No. 336003 (pro hac vice)
333 South Hope Street, 43rd Floor
Los Angeles, CA 90071-1422
Telephone: 213.620.1780
mkeshavarzi@sheppardmullin.com
jburns@sheppardmullin.com
mmckisson@sheppardmullin.com

Attorneys for Defendant KAISER FOUNDATION HEALTH PLAN, INC.

#### HINSHAW & CULBERTSON LLP

By:/s/Steven Lehner

STEVEN D. LEHNER, 39373 RUEL W. SMITH, 36548 100 S. Ashley Dr. Ste 500 Tampa, FL 33602-5301 Tel: 813.276.1956 slehner@hinshawlaw.com; rsmith@hinshawlaw.com

Attorneys for Defendant CAPITAL HEALTH PLAN. INC.

### MILAM HOWARD NICANDRI & GILLAM, P.A.

By:/s/Michael Fackler

MICHAEL T. FACKLER, 612421 14 East Bay Street Jacksonville, FL 32202 Tel: 904-357-3660 mfackler@milamhoward.com

Attorneys for Defendant C2C INNOVATIVE SOLUTIONS, INC.

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 3<sup>rd</sup> day of August 2023, a true and correct copy of the above and the foregoing document has been served on all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system.

/s/Elisabeth Walters
Elisabeth Walters