

**UNITED STATES DISTRICT COURT**  
**SOUTHERN DISTRICT OF TEXAS**  
**HOUSTON DIVISION**

**REACH AIR MEDICAL SERVICES  
LLC, CALSTAR AIR MEDICAL  
SERVICES, LLC and GUARDIAN  
FLIGHT, LLC**

**Plaintiffs**

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**Civil Action No. 4:22-CV-  
03979**

**vs.**

**KAISER FOUNDATION HEALTH  
PLAN INC., and MEDICAL  
EVALUATORS OF TEXAS ASO,  
LLC**

**Defendant**

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**DEFENDANT MEDICAL EVALUATORS OF TEXAS ASO, LLC’S JOINDER OF  
KAISER FOUNDATION HEALTH PLAN INC’S MOTION TO DISALLOW  
DISCOVERY IN THIS MATTER, OR ALTERNATIVELY, FOR A STAY OF  
DISCOVERY**

Defendant Medical Evaluators of Texas ASO, LLC (hereinafter “MET” or “Defendant”), by and through their undersigned counsel, files this Joinder of Defendant Kaiser Foundation Health Plan Inc.’s (hereinafter “Kaiser” or “Defendant”) Motion to Disallow in this Matter, or Alternatively, for a Stay of Discovery

Defendant MET joins Defendant Kaiser in their Motion to Disallow Discovery or Alternatively for a Stay in Discovery pending Kaiser’s and MET’s Motions to dismiss filed in this case. Defendant MET adopts the arguments raised by Defendant Kaiser in it Motion and urges the Court to grant the Motion to Disallow Discovery in this Matter, or Alternatively, for a Stay of Discovery. *See* FED. R. CIV. P. 10(c).

Defendant MET respectfully requests that the Court accepts this Joinder in connection with Defendant Kaiser's motion.

Respectfully submitted,

THE VETHAN LAW FIRM, PC

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*ATTORNEYS FOR DEFENDANT  
MEDICAL EVALUATORS OF TEXAS ASO, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was filed electronically on February 24, 2023. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt.

/s/ Charles M. R. Vethan

Charles M. R. Vethan