

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

ELECTRICAL MEDICAL TRUST et al.,

Plaintiffs,

v.

U.S. ANESTHESIA PARTNERS, INC., et al.,

Defendants.

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Civil Action No. 4:23-cv-04398

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**REPLY IN SUPPORT OF THE WELSH CARSON ENTITIES' MOTION TO DISMISS**

Plaintiffs' Opposition confirms that the Complaint states no viable claim against any Welsh Carson entity. Indeed, it doubles down on Plaintiffs' improper conflation of USAP with the Welsh Carson entities, seeking to impose liability for a decade-old initial investment and long-ago acquisitions by USAP. Plaintiffs' stale and defective pleading compels dismissal.

*First*, all of Plaintiffs' claims against the Welsh Carson entities are barred by the statute of limitations. As the Opposition concedes, the Complaint alleges only two USAP acquisitions (in 2019 and 2020) that fall within the limitations period, and it fails to allege any independent wrongful conduct by minority investor Welsh Carson as to either. The Opposition argues a Welsh