
Nos. 24-10134 & 24-10135

IN THE UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT

MED-TRANS CORPORATION, *et al.*,

Plaintiffs-Appellants,

v.

CAPITAL HEALTH PLAN, *et al.*,

Defendants-Appellees.

On Appeal from the United States District Court
for the Middle District of Florida, Hon. Timothy J. Corrigan
Case Nos. 3:22-cv-01077-TJC-JBT & 3:22-cv-01153-TJC-JBT

**APPELLANTS' UNOPPOSED MOTION FOR DISMISSAL OF APPEAL
NO. 24-10134**

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CERTIFICATE OF INTERESTED PERSONS

As required by Federal Rule of Appellate Procedure 26.1 and 11th Circuit Rule 26.1-1(a), Plaintiffs-Appellants Med-Trans Corporation and REACH Air Medical Services LLC provide this Certificate of Interested Persons and Corporate Disclosure Statement. The following trial judges, attorneys, persons, associations of persons, firms, partnerships, or corporations have an interest in the outcome of this appeal:

1. Air Medical Group Holdings, LLC (Parent Company of REACH Air Medical Services LLC)
2. America's Health Insurance Plans (Amicus Curiae)
3. Barcia, Giselle (Counsel for Interested Party United States of America)
4. Burns, John F. (Counsel for Defendant-Appellee Kaiser Foundation Health Plan Inc.)
5. Burns, P.A. (Counsel for Amicus Curiae)
6. Burns, Thomas A. (Counsel for Amicus Curiae)
7. C2C Innovative Solutions, Inc. (Defendant-Appellee)
8. Capital Health Plan, Inc. (Defendant-Appellee)
9. Carlton Fields, P.A. (Counsel for Defendant-Appellee C2C Innovative Solutions, Inc.)
10. Chang, Abraham (Counsel for Plaintiff-Appellant)

11. Cohen, Jeffrey A. (Counsel for Defendant-Appellee C2C Innovative Solutions, Inc.)
12. Corrigan, Timothy J. (U.S. District Judge, United States District Court for the Middle District of Florida)
13. DeGory, Amelia A. (Counsel for Plaintiffs-Appellants)
14. Deutsch Hunt PLLC (Counsel for Amicus Curiae)
15. Dodd, Christian Edward (Counsel for Defendant-Appellee Kaiser Foundation Health Plan Inc.)
16. Fackler, Michael T. (Counsel for Defendant-Appellee C2C Innovative Solutions, Inc.)
17. Giboney, Pierce N. (Counsel for Defendant-Appellee C2C Innovative Solutions, Inc.)
18. Global Medical Response, Inc. (Parent Company of Air Medical Group Holdings, LLC, which is the parent company of REACH Air Medical Services LLC)
19. Guilday Law, PA (Counsel for Defendant-Appellee Capital Health Plan, Inc.)
20. Halgren, Matthew G. (Counsel for Defendant-Appellee Kaiser Foundation Health Plan Inc.)

21. Hatch, George W. III (Counsel for Defendant-Appellee Capital Health Plan, Inc.)
22. Hickey Smith LLP (Counsel for Defendant-Appellee Kaiser Foundation Health Plan Inc.)
23. Hinshaw & Culbertson (Counsel for Defendant-Appellee Capital Health Plan, Inc.)
24. Hunt, Hyland (Counsel for Amicus Curiae)
25. Jones Day (Counsel for Plaintiffs-Appellants)
26. Kaiser Foundation Health Plan Inc. (Defendant-Appellee)
27. Keshavarzi, Mohammed (Counsel for Defendant-Appellee Kaiser Foundation Health Plan Inc.)
28. Lang, Joseph H. Jr. (Counsel for Defendant-Appellee C2C Innovative Solutions, Inc.)
29. Lehner, Steven D. (Counsel for Defendant-Appellee Capital Health Plan, Inc.)
30. McKisson, Megan Kathleen (Counsel for Defendant-Appellee Kaiser Foundation Health Plan Inc.)
31. Med-Trans Corporation (Plaintiff-Appellant)
32. Milam Howard Nicandri & Gillam, P.A. (Counsel for Defendant-Appellee C2C Innovative Solutions, Inc.)

33. Nicandri, Peter E. (Counsel for Defendant-Appellee C2C Innovative Solutions, Inc.)
34. Norton Rose Fulbright US LLP (Counsel for Plaintiffs-Appellants)
35. REACH Air Medical Services, LLC (Plaintiff-Appellant)
36. Russell, Lanny (Counsel for Plaintiff-Appellant)
37. Schramek, Adam T. (Counsel for Plaintiffs-Appellants).
38. Sheppard Mullin Richter & Hampton LLP (Counsel for Defendant-Appellee Kaiser Foundation Health Plan Inc.)
39. Smith Hulsey & Busey (Counsel for Plaintiff-Appellant)
40. Smith, Ruel W. (Counsel for Defendant-Appellee Capital Health Plan, Inc.)
41. Spinner, Samuel B. (Counsel for Defendant-Appellee C2C Innovative Solutions, Inc.)
42. Taylor, Charlotte H. (Counsel for Plaintiffs-Appellants)
43. TMF Health Quality Institute (Parent Company of Defendant-Appellee C2C Innovative Solutions, Inc.)
44. Toomey, Joel B. (U.S. Magistrate Judge, United States District Court for the Middle District of Florida)
45. United States of America (Interested Party)

46. Van Den Berg, Elizabeth Minor (Counsel for Defendant-Appellee
Capital Health Plan, Inc.)

47. Vincent, Joshua G. (Counsel for Defendant-Appellee Capital Health Plan,
Inc.)

No other persons, associations of persons, firms, partnerships, corporations,
guarantors, insurers, affiliates, parent or subsidiary corporations, or other legal
entities are financially interested in the outcome of this case or appeal.

Dated: May 15, 2024.

/s/ Charlotte H. Taylor
Charlotte H. Taylor
Counsel for Plaintiff-Appellant

**APPELLANTS' UNOPPOSED MOTION FOR VOLUNTARY DISMISSAL
OF APPEAL NO. 24-10134.**

Pursuant to Federal Rule of Appellate Procedure 42(b) and Eleventh Circuit Rule 42-1(a), Med-Trans Corporation (“Med-Trans Corp.”) and REACH Air Medical Services, LLC (“REACH”) (collectively, “Plaintiffs-Appellants”) hereby move for the voluntary dismissal of Appeal No. 24-10134. In support of this motion, Plaintiffs-Appellants state as follows:

This consolidated appeal arises from Complaints that REACH and Med-Trans Corp. brought against C2C Innovative Solutions, Inc. (“C2C”) and insurers Kaiser Foundation Health Plan Inc. (“Kaiser”) and Capital Health HMO (“Capital Health”), respectively. Med-Trans Corp. brought claims against Capital Health and C2C in Case No. 3:22-cv-01077. REACH brought claims against Kaiser and C2C in Case No. 3:22-cv-01153. The District Court dismissed both Complaints in a single order. D. Ct. Dkt. No. 65 (Case No. 3:22-cv-01077); D. Ct. Dkt. No. 70 (Case No. 3:22-cv-01153). Med-Trans Corp. and REACH both appealed, ECF 1 (No. 24-10134); ECF 1 (No. 24-10135), and this Court granted their unopposed motion to consolidate the two appeals, ECF 15 (No. 24-10134); ECF 20 (No. 24-10135).

Med-Trans Corp. has subsequently resolved its dispute with Capital Health, and thus moves to dismiss Appeal No. 24-10134, including its claims against C2C

arising from that dispute. *See* Fed. R. App. P. 42(b) (“An appeal may be dismissed on the appellant’s motion on terms agreed to by the parties or fixed by the court.”).

Plaintiffs-Appellants ***do not*** move to dismiss Appeal No. 24-10135, which arises from REACH’s claims against Kaiser Health and C2C in Case No. 3:22-cv-01153. REACH’s separate claims against C2C and Kaiser in Appeal No. 24-10135 remain live, and Plaintiffs-Appellants intend to timely file their opening brief as to those claims on May 22, 2024.

CONCLUSION

For the foregoing reasons, Plaintiffs-Appellants respectfully request that the Court dismiss Appeal No. 24-10134 arising from Med-Trans Corp.’s claims against Capital Health and C2C.

May 15, 2024

Respectfully submitted,

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Nos. 24-10134 & 24-10135

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CERTIFICATE OF COMPLIANCE

This document complies with the type-volume limitation of Fed. R. App. P. 27(d)(2)(A) because, excluding the parts of the document exempted by Fed. R. App. P. 32(f), this document contains 304 words. This document complies with the typeface requirements of Fed. R. App. P. 32(a)(5) and the type-style requirements of Fed. R. App. P. 32(a)(6) because this document has been prepared in a proportionally spaced typeface using Microsoft Word in 14-point Times New Roman font in text and footnotes.

Dated: May 15, 2024.

/s/ Charlotte H. Taylor
Charlotte H. Taylor
Counsel for Plaintiff-Appellant

CERTIFICATE OF SERVICE

I hereby certify that on May 15, 2024, the foregoing was electronically filed with the Clerk of the Court by using the Court's Appellate PACER system, which will automatically send a notice of electronic filing to all counsel of record. Under 11th Circuit Rule 25-3(a), no independent service by other means is required.

Dated: May 15, 2024.

/s/ Charlotte H. Taylor
Charlotte H. Taylor
Counsel for Plaintiff-Appellant