

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

Case No.: 0:24-cv-60591-MD

CONSWALLO TURNER, TIESHA  
FOREMAN, ANGELINA WELLS,  
PAULA LANGLEY, VERONICA KING,  
NAVAQUOTE, LLC and WINN  
INSURANCE AGENCY, LLC, individually  
and on behalf of all others similarly situated,

Plaintiffs,

v.

ENHANCE HEALTH, LLC,  
TRUECOVERAGE, LLC, SPERIDIAN  
TECHNOLOGIES, LLC, BENEFITALIGN,  
LLC, NUMBER ONE PROSPECTING, LLC  
d/b/a MINERVA MARKETING, BAIN  
CAPITAL INSURANCE FUND L.P.,  
DIGITAL MEDIA SOLUTIONS LLC, NET  
HEALTH AFFILIATES, INC., MATTHEW  
B. HERMAN, BRANDON BOWSKY,  
GIRISH PANICKER, AND MATTHEW  
GOLDFUSS.

Defendants.

**JOINT NOTICE OF SETTLEMENT OF CLAIMS AGAINST SETTLING DEFENDANTS**

Plaintiffs, CONSWALLO TURNER, TIESHA FOREMAN, ANGELINA WELLS, PAULA LANGLEY, VERONICA KING, NAVAQUOTE, LLC and WINN INSURANCE AGENCY, LLC (collectively, "Plaintiffs") and Defendants ENHANCE HEALTH, LLC, BAIN CAPITAL INSURANCE FUND L.P., NET HEALTH AFFILIATES, INC., and MATTHEW B. HERMAN (collectively, the "Settling Defendants"), by and through their respective undersigned counsel and pursuant to Local Rule 16.4, notify the Court that Plaintiffs and the Settling Defendants have reached a settlement of the Plaintiffs' claims against the Settling Defendants.

The Plaintiffs and the Settling Defendants will file a stipulation of dismissal without prejudice of the Plaintiffs' claims against the Settling Defendants upon satisfaction of certain conditions of the settlement. The Plaintiffs and Settling Defendants anticipate filing the stipulation of dismissal within thirty (30) days from the date of this notice.

Dated: April 11, 2025

By: /s/ Olga M. Vieira

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

Samuel G. Williamson (FBN: 1033817)  
Olga M. Vieira (FBN: 29783)  
Laura N. Ferguson (FBN: 1047701)  
2601 South Bayshore Dr., Suite 1550  
Miami, FL 33133  
Telephone: (305) 496-2988  
samwilliamson@quinnemanuel.com  
olgavieira@quinnemanuel.com  
lauraferguson@quinnemanuel.com

*Attorneys for Enhance Health LLC, and  
Matthew B. Heman*

By: /s/ Timothy A. Kolaya

STUMPHAUZER KOLAYA  
NADLER & SLOMAN, PLLC  
2 South Biscayne Blvd., Suite 1600  
Miami, Florida 33131  
Telephone: (305) 614-1400

Timothy A. Kolaya, Esq. (FBN 056140)  
tkolaya@sknlaw.com

*Attorneys for Net Health Affiliates, Inc.*

By: /s/ Ariel Deitchman

KIRKLAND & ELLIS LLP  
Ariel Deitchman  
Fla Bar No. 118163  
Three Brickell City Centre  
98 S.E. 7th Street, Suite 700  
Miami, FL 33131  
Telephone: +1 305 432 5600  
Facsimile: +1 305 432 5601  
ariel.deitchman@kirkland.com

KIRKLAND & ELLIS LLP  
Jay P. Lefkowitz *pro hac vice*  
Josh Greenblatt *pro hac vice*  
601 Lexington Avenue  
New York, NY 10022  
Telephone: +1 212 446 4800  
Facsimile: +1 212 446 4900  
lefkowitz@kirkland.com  
josh.greenblatt@kirkland.com

KIRKLAND & ELLIS LLP  
John M. Robinson *pro hac vice*  
333 West Wolf Point Plaza  
Chicago, IL 60654  
Telephone: +1 312 862 2000  
Facsimile: +1 312 862 2200  
john.robinson@kirkland.com

*Attorneys for Defendant Bain Capital  
Insurance Fund L.P.*

By: /s/ Jason Kellogg  
LEVINE KELLOGG LEHMAN  
SCHNEIDER + GROSSMAN LLP  
Jason K. Kellogg, P.A.  
Florida Bar No. 0578401  
Primary email: jk@lklsg.com  
Secondary email: ame@lklsg.com  
Victoria J. Wilson  
Florida Bar No. 92157  
Primary email: vjw@lklsg.com  
Secondary email: rm@lklsg.com  
100 Southeast Second Street  
Miami Tower, 36th Floor  
Miami, Florida 33131  
Telephone: (305) 403-8788  
Facsimile: (305) 403-8789

By: /s/ Jason R. Doss  
THE DOSS FIRM, LLC  
Jason R. Doss  
Florida Bar No. 0569496  
Primary email: jasondoss@dossfirm.com  
1827 Powers Ferry Road Southeast  
Atlanta, Georgia 30339  
Telephone: (770) 578-1314  
Facsimile: (770) 578-1302

*Attorneys for Plaintiffs*