

CASE NO. 0:24-cv-60591-DAMIAN/Valle

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 0:24-cv-60591-DAMIAN/Valle

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,

CLASS ACTION

(Jury Trial Demanded)

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 STATUS REPORT

Pursuant to the Court’s Order Requiring Joint Status Report (the “Order”) [ECF No. 154], Plaintiffs, Conswallo Turner, Tiesha Foreman, Angelina Wells, Veronica King, Paula Langley, Navaquote, LLC, and Winn Insurance Agency, LLC (collectively, “Plaintiffs”), Defendants TrueCoverage, LLC, Speridian Technologies, LLC, Benefitalign LLC, Girish Panicker and Matthew Goldfuss (collectively the “TrueCoverage Parties”), and Defendants Enhance Health

LLC, Bain Capital Insurance Fund L.P., Net Health Affiliates, Inc. and Matthew Herman (collectively, the “Enhance Parties”),¹ respectfully submit this Joint Status Report, and state:

Plaintiffs have settled with the Enhance Health Parties and expect to be in a position to file a formal voluntary dismissal shortly.

Plaintiffs and the TrueCoverage Parties anticipate that Plaintiffs will be filing an unopposed motion for leave to bring a Second Amended Complaint that streamlines the lawsuit and focuses on the remaining defendants. In the meantime, Plaintiffs and the TrueCoverage Parties continue to work diligently toward a resolution of this matter. The Plaintiffs and the TrueCoverage Parties expect that continued efforts may soon be successful. Because Plaintiffs and the TrueCoverage Parties are focused on resolution of the matter, they respectfully submit that lifting the current stay (other than to grant the motion for leave) would not be in the interests of judicial economy. However, the Parties respectfully request that the Court grant Plaintiffs’ forthcoming unopposed motion for leave to bring a Second Amended Complaint as soon as possible because it will help facilitate settlement discussions.

¹ Defendant Digital Media Solutions Inc. d/b/a Protect Health filed for bankruptcy shortly after the Amended Complaint was filed. *See In re Digital Media Solutions, Inc.*, No. 24-90468 (ARP) (S.D. Tex.). An automatic stay is in place.

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the forgoing document was served on May 1, 2025, via the Court's CM/ECF filing system to all recipients registered to receive notices of electronic filings generated by CM/ECF for this case.

By: /s/ Jason Kellogg