

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF FLORIDA**

UNITED STATES OF AMERICA )  
*ex rel.* DR. CLARISSA ZAFIROV, )  
) )  
Plaintiff and Relator, )  
) )  
v. ) )  
) )  
FLORIDA MEDICAL ASSOCIATES, LLC, )  
d/b/a VIPCARE; PHYSICIAN PARTNERS, LLC, )  
PHYSICIAN PARTNERS SPECIALITY )  
SERVICES, LLC; SUN LABS USA, INC. )  
ANION TECHNOLOGIES, LLC; ANTHEM, )  
INC.; FREEDOM HEALTH, INC.; OPTIMUM )  
HEALTHCARE, INC.; and SIDDHARTHA )  
PAGIDIPATI, )  
) )  
Defendants. )  
\_\_\_\_\_ )

CASE NO. 8:19-cv-01236-SDM-SPF

**NOTICE OF PENDENCY OF OTHER ACTIONS**

In accordance with Local Rule 1.04(c), Plaintiff and Relator Dr. Clarissa Zafirov certifies that the instant action **IS RELATED** to pending or closed civil or criminal cases previously filed in this Court, or any other Federal or State court, or administrative agency as indicated below:

- *United States ex rel. Keith Fernandez v. Freedom Health, Inc. et al.*, Case No. 8:18-cv-01959-MSS-JSS (M.D. Fla.) (unsealed on 09/22/2020) – no common issues of fact or law; potential for resolution process to intersect due to overlap of defendants
- *United States ex rel. Dr. George Mansour v. Freedom Health, Inc. et al.*, Case No. 8:19-cv-2977-T-36JSS (M.D. Fla.) (unsealed on 09/28/2020) – common issues of fact and law; overlap of defendants

Relator further certifies that she will serve a copy of this Notice of Pendency of Other Actions upon any new parties added to this case no later than eleven days after appearance of the party.

Respectfully submitted this 1st day of October, 2020,

Jillian L. Estes

Frederick M. Morgan, Jr. (Ohio Bar No. 0027687)

Jillian L. Estes (Fla. Bar No. 0055774)

MORGAN VERKAMP LLC

35 East 7<sup>th</sup> Street, Suite 600

Cincinnati, OH 45202

Phone: (513) 651-4400

Fax: (513) 651-4405

rmorgan@morganverkamp.com

jillian.estes@morganverkamp.com

Kenneth J. Nolan (Fla. Bar No. 603406)

Marcella Auerbach (Fla. Bar No. 249335)

NOLAN, AUERBACH & WHITE, LLP

435 N. Andrews Ave., Suite 401

Fort Lauderdale, FL 33301

Phone: (954) 779-3943

Fax: (954) 779-3937

ken@whistleblowerfirm.com

marcella@whistleblowerfirm.com

*Counsel for Relator Dr. Clarissa Zafirov*

**CERTIFICATE OF SERVICE**

I, Jillian Estes, hereby certify that the foregoing Notice was served on October 1, 2020, to all parties of record via the CM/ECF electronic filing system.

/s/ Jillian L. Estes

Jillian L. Estes (Fla. Bar No. 0055774)