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Of Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
EUGENE DIVISION

KAREN STAPLETON, as guardian *ad litem*  
for JANE STAPLETON; DAN McGEE, MD,  
PhD, an individual and licensed medical  
practitioner; and EUGENE EMERGENCY  
PHYSICIANS, P.C., an Oregon professional  
corporation;

Plaintiffs,

v.

PEACEHEALTH, a Washington nonprofit  
corporation; APOLLOMD, INC., a Georgia  
corporation; APOLLOMD BUSINESS  
SERVICES, LLC; LANE EMERGENCY  
PHYSICIANS LLC, an Oregon limited  
liability corporation; and DOES 1 - 5;

Defendants.

Case No. 6:26-cv-00684-MTK

DECLARATION OF BRAD  
ANDERSON

In Support Of Plaintiffs' Motion For An  
Order To Show Cause Why Preliminary  
Injunction Should Not Issue

I, Brad Anderson, hereby declare:

1. I am the President of Eugene Emergency Physicians, P.C., an Oregon professional  
corporation ("EEP"), and I make this declaration based upon my personal knowledge.

2. I have been in charge of recruiting, interviewing, investigating and hiring emergency physicians in Lane County for EEP for nearly a decade.

3. Prior to an emergency physician providing emergency medical services to the community, there are a number of steps (requiring approximately three months) that must be taken to ensure they are qualified:

a. the physician's employment history must be verified and investigated, which can take significant time if the physician has worked in numerous locations over her or his career,

b. the physician's malpractice history must be verified and investigated, which similarly can require significant time depending upon prior experience,

c. the physician must apply for and obtain a license from the State of Oregon, which often requires at least multiple weeks,

d. once licensed, the physician must be vetted by the Credentialling Committee, which typically takes at least three weeks. A true copy of the New Provider Hiring/Credentialing Process that I follow is attached hereto as Exhibit 1.

e. once licensed, the physician must be presented to and approved by the Medical Executive Committee,

4. Defendants have no credentialled physicians for the Riverbend and Cottage Grove PeaceHealth hospitals, meaning not one provider could see a patient in need of emergency treatment.

5. Defendants have no physicians up for credentialling in April at Riverbend.

6. It is likely that Defendants will need to employ an "emergency" credentialling

process (because Defendants have no physicians up for credentialing in April) in order to try and credential virtually every physician that they can or have already recruited in May, so that emergency physicians can begin practicing in June.

7. This plan puts future emergency patients in Lane County at risk. There will either be an insufficient number of qualified emergency medical providers because there is insufficient time to properly vet them, or the emergency medical providers hired will not be properly vetted.

8. In addition to the general steps required for hiring an emergency physician described above, hiring emergency physicians in Eugene, Florence and Cottage Grove can be particularly challenging simply because of the geographic location(s).

9. In March of 2026, Defendants admitted that it would take at least two years to hire sufficient permanent staff for the emergency medicine needs for the PeaceHealth facilities in Lane County.

10. This is a significant overestimate. The maximum number of providers I have been able to hire in a year has been six.

11. The odds of any entity (let alone an entity like ApolloMD, which has no connection to or presence in Lane County) successfully recruiting sufficiently qualified full-time emergency physicians to Lane County between now and June of 2026 is zero and Defendants have conceded the same.

12. Further, the challenges associated with trying to bring in temporary emergency physicians with no experience in the hospital, no experience with nursing partners and staff, no experience in the geographical area, and no understanding of the types of emergencies common to the area will diminish the patient care available in the area for a significant period of time.

13. Attached hereto as Exhibits 2 and 3 are true copies of public statements by PeaceHealth that were provided to EEP.

14. Attached hereto as Exhibit 4 is a true copy of a public statement by ApolloMD that was provided to EEP.

15. Attached hereto as Exhibit 5 is a true copy of a text message on behalf of ApolloMD that was sent to EEP.

16. In late 2025, PeaceHealth suddenly announced that it would not renew its contract with EEP but would instead issue a Request for Proposal (“RFP”) from potential providers of emergency medical services. EEP participated in the RFP process in good faith, while PeaceHealth kept its evaluation and the process generally secret.

17. On February 3, 2026, PeaceHealth shocked Plaintiffs, the Eugene medical community, and the general public by announcing that it would end its long-standing relationship with EEP starting in May 2026. PeaceHealth further announced that, instead of continuing to contract with EEP, it had awarded a contract to ApolloMD, a Georgia corporation. At no point before the announcement did PeaceHealth identify any specific deficiencies for EEP (or give EEP any opportunities to address those deficiencies), before it ended their relationship.

18. EEP provides emergency medical staff to the PeaceHealth Hospitals, and has done so for over 35 years. EEP currently has 41 qualified, licensed and credentialed emergency physicians working in the PeaceHealth Hospitals.

19. Lane Emergency Physicians LLC has not advertised to hire any physicians to replace the 41 EEP physicians who will no longer be providing services at the PeaceHealth facilities in a matter of months.


20. I am not aware of a single ApolloMD-affiliated physician who is credentialed at any PeaceHealth hospital.

21. Dr. Dan McGee is a shareholder and physician with EEP, and has lived in Lane County and practiced emergency medicine here since 2013. He has practiced with EEP at PeaceHealth Hospitals since 2015 and participated in PeaceHealth's purported RFP process.

22. Because of the timeline for vetting, hiring and credentialing qualified emergency physicians, there is significant urgency to the issuance of a preliminary injunction to maintain the status quo. The scheduled transition of every current emergency physician serving at PeaceHealth Hospitals is in approximately two to three months. If action is not taken, not only will Defendants have no likelihood of adequately staffing emergency rooms with full time resident physicians but those who are currently here have, and will continue to, make plans to leave. In other words, without preliminary injunctive relief, the harm that this litigation is directed at avoiding will be suffered just by virtue of delay.

**I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.**

Dated: 4/7/2026 \_\_\_\_\_

DocuSigned by:  
  
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\_\_\_\_\_  
Brad Anderson

## New Provider Hiring/Credentialing Process

1. Interview
  - a. Check References
2. Sign Employment Agreement
  - a. Contract copy to attorney
3. PeaceHealth Attestation Form and CV submitted to PeaceHealth Medical Staff
  - a. Request which sites will need to be credentialed at.
  - b. Provider sent Oregon Credentialing application electronically
  - c. Provider must submit OMB license and DEA license
4. Complete LogixHealth provider sheet (billing company)
  - a. Provider must supply required documents to billing company
  - b. Provider will sign insurance paperwork as applicable
5. Complete EMPAC provider sheet (malpractice)
6. Complete EPIC training
7. PeaceHealth virtual orientation with Medical Staff
8. Pick up Badge at RiverBend hospital Security
9. Office orientation
  - a. Complete new hire paperwork to get set up with benefit package
10. Medical Director orientation



March 20, 2026

Governor Tina Kotek  
254 State Capitol  
Salem, OR 97301

**Re: PeaceHealth Emergency Department Transition**

Dear Governor Kotek,

On behalf of PeaceHealth, thank you for sharing your perspective regarding the transition of emergency physician services in Lane County. We appreciate your engagement on behalf of the patients, families and communities who depend on timely, high-quality emergency care.

We share your focus on restoring community trust and moving forward with transparency. As I recently shared internally with our caregivers, I should have communicated more clearly about the rationale for this change, the criteria used to select a new partner and what the decision would mean for the day-to-day operations of our hospitals. I am committed to more direct and consistent engagement as we move forward.

Our highest priority throughout this transition is uninterrupted access to safe and reliable emergency care. We welcome the opportunity to outline how we will deliver on this commitment and work collaboratively with your office to reinforce community confidence.

**A Safer, More Transparent Alternative to Delay**

We hear your concern about deterioration in emergency services. We believe the most effective way to address that concern is not delay, but transparency paired with accountability. Maintaining the transition timeline while openly measuring and reporting readiness metrics provides stronger protection for patients than postponement.

I want to be clear that this decision and the implementation timeline are not rushed. We followed a structured and rigorous process that included timely contract expiration notice, a formal request for proposals, careful evaluation, award and implementation planning. Since the process began in November 2025, service implementation dates of June 1 and July 1 have consistently guided planning, operational readiness and decision-making.

Introducing a delay at this stage would create meaningful patient safety risk by undermining the stability and certainty required to safely operate emergency departments. Reliable transition dates are essential to workforce planning, physician recruitment and clinical readiness.

PeaceHealth is confident in ApolloMD and Lane Emergency Physicians' ability to staff our emergency departments based on the established transition dates. Since early February, ApolloMD has made substantial investments in physician recruitment and operational preparedness in reliance on this timeline. A delay would disrupt those efforts by introducing uncertainty for recruited physicians, extending gaps created by departures of EEP physicians who choose not to stay and complicating staffing at a critical moment. These are conditions that increase rather than reduce risk to patient care.

In a noteworthy advancement toward our shared goals, **we propose regularly publishing community-facing transition dashboards** that track key indicators of emergency department performance, including mortality, diversion, "door to doctor" times, and recruitment statistics. These dashboards would provide



real-time visibility, reinforce public trust and ensure identification of and response to any emerging risks beginning in April and throughout the transition period.

#### **Staffing, Credentialing and Emergency Preparedness**

PeaceHealth is not replacing its emergency physicians with a temporary workforce. The physicians of Lane Emergency Physicians will live in our communities. Some temporary physician staffing will be used, particularly at the beginning of the transition, which is a safe and established practice. All physicians, permanent or temporary, must meet the same rigorous medical staff standards for clinical quality, competence and patient safety that the EEP physicians are required to meet today.

If some of the EEP physicians choose to stay in the community, reliance on temporary physicians will be reduced. But, regardless of the decisions of the EEP physicians, our emergency departments will be safely staffed and we do not anticipate the need for patient diversion.

The transition dashboards described above will also track the number of physicians moving through our hospitals' medical staff credentialing processes. This will complement your office's monitoring of the Oregon Medical Board licensing process. We welcome any information you are able to share regarding licensing status, as well as any support that may facilitate timely review of applications.

In collaboration with ApolloMD and Lane Emergency Physicians, we will ensure that a core group of physicians are physically present within the Lane County service area at all times, beginning as of the transition dates. This commitment ensures readiness to respond to mass-casualty incidents or other unforeseen events. ApolloMD physicians are experienced in incident and disaster response, having cared for patients affected by tornados, wildfires and hurricanes, and will be ready to serve our communities if needed.

In addition, consistent with your recommendations, we will share our current patient diversion policies, engage neighboring hospitals and regional healthcare providers, and develop and share risk mitigation and disaster response plans with OHA aligned to potential needs identified during the transition period.

#### **Clarifying the decision-making process**

While confidentiality obligations limit our ability to disclose proposal materials or detailed scoring, we recognize the importance of public understanding. We created a more thorough description of our process and decision framework (attached) which we will make publicly available today.

#### **Continuing collaboration in service of our communities**

We remain committed to ongoing cooperation with your office, state agencies and lawmakers whose constituents depend on our hospitals. We remain steadfast in our commitment to transparency, collaboration and the delivery of safe, high quality emergency care.

Sincerely,

Jim McGovern, MD  
Chief Hospital Executive, Oregon  
PeaceHealth



# PeaceHealth Oregon Emergency Department RFP: Reasoning, Participants, Process and Criteria

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## Why an RFP

PeaceHealth is committed to regularly and thoughtfully evaluating how we partner with external organizations to deliver care in our communities. This responsibility requires balancing respect and appreciation for longstanding relationships with a careful assessment of how best to support delivery of high quality, sustainable care to our patients now and in the future.

To support informed decision-making, we use structured request-for-proposal (RFP) processes to understand the range of potential partners and assess their capabilities, experience and alignment with our Mission, Vision and Values. We recently applied this approach for emergency services at PeaceHealth Ketchikan Medical Center and PeaceHealth Peace Island Medical Center, as well as for anesthesia services at PeaceHealth Sacred Heart Medical Center, RiverBend in 2023.

As part of the emergency department renewal process for 2026, PeaceHealth conducted an RFP for emergency physician services, with the transition timeline aligned to the conclusion of Eugene Emergency Physician's existing contract term.

## RFP Participant Organizations

Six organizations were invited to participate in the RFP, following a broad and intentional market scan. Four organizations, including Eugene Emergency Physicians, submitted proposals.

## RFP Selection Committee

The RFP responses were evaluated by a diverse committee including Drs. McGovern and Ruscher, along with leaders from nursing, finance and emergency departments representing all three Lane County hospitals. To ensure fairness, consistency and transparency, a non-voting system leader with experience in managing clinical services RFPs and clinical services transitions served as the sole point of contact for RFP submissions.

## RFP Evaluation Criteria

Participating organizations were notified that they would be evaluated based on the following criteria: qualifications, experience, ability to recruit and retain quality physicians, management platform sophistication, quality improvement programs and metrics, financial stability, transition planning, potential for collaboration on performance improvement initiatives, performance on operational and clinical indicators (including sample quality dashboards) patient satisfaction results, and cost.

## RFP Review Process

The RFP selection committee reviewed proposals on their individual merits. Each organization



participated in two interview rounds: the first to present themselves and ask questions about PeaceHealth and the three Lane County emergency departments, and the second for committee members to seek clarification on the submitted proposal. The committee then evaluated each participant based on a scorecard of 41 established criteria in nine review categories. Throughout the process, a non-voting system leader served as the sole point of contact for RFP submissions, ensuring consistent and transparent communication.

Following careful scoring and deliberation, the committee recommended awarding the contract to ApolloMD as the proposal best aligned with PeaceHealth Oregon's current and future needs. PeaceHealth system leadership approved this recommendation.

### Basis for Decision

The RFP process identified significant opportunities to enhance quality, access and clinician support by transitioning to a new organization, ApolloMD, including:

- **Proven success in process improvement:** ApolloMD provided detailed case studies demonstrating strong, hands-on support for process improvement initiatives that directly impact access and patient flow.
- **Strong clinical excellence infrastructure:** ApolloMD described extensive programs for benchmarking, monitoring and supporting adherence to clinical quality metrics, ensuring consistent, evidence-based care across sites.
- **Robust commitment to patient satisfaction:** ApolloMD uses detailed patient satisfaction tracking and training tools with clear accountability at the clinician level.
- **Comprehensive clinician support:** ApolloMD has demonstrated success in recruitment and retention, formal leadership development and mentoring programs. This provides stability and support for our care teams.
- **Deep community integration:** ApolloMD has a strong record of retaining local clinicians and deploying regional leadership as "boots on the ground" workers to ensure true understanding of community needs and ensure care reflects those needs.
- **Physician focus:** ApolloMD is a physician-owned and physician-led medical group, not a staffing company. They are financially stable and are not backed by any private equity funds.



# PeaceHealth Oregon Emergency Department physician management transition Fact Sheet

*As of March 3, 2026*

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## Overview

PeaceHealth is transitioning ED physician management services from Eugene Emergency Physicians (EEP) to ApolloMD across our three Lane County medical centers to strengthen patient access, throughput and quality. The transition will begin on June 1, 2026, at PeaceHealth Peace Harbor and Cottage Grove Community Medical Centers, and on July 1, 2026, at PeaceHealth Sacred Heart Medical Center at RiverBend.

## Challenges Driving the Change

The emergency department at PeaceHealth Sacred Heart Medical Center at RiverBend has experienced a sharp, sustained rise in patient volume, increasing from [roughly 55,000 visits in fiscal year 2024 to more than 80,000 projected this year](#). This rapid growth reflects both community-level and regional system pressures, including the closure of the University District emergency department, an aging population and the continued loss of primary care access across Lane County. Together, these factors have led to a surge in patients seeking emergency care, many of whom present with **higher acuity and more complex medical needs, and a growing reliance on ambulance transport**. With the rise in patient volume, the RiverBend emergency department's physical layout has become **too small since the facility opened in 2008**, forcing care teams to rely on temporary and non-traditional spaces, to safely manage the surge in high-acuity patients. [Emergency departments across Oregon are experiencing significant strain, with lengthy average visit times and high, variable and often crowded conditions](#).

## Why ApolloMD

PeaceHealth selected ApolloMD after completing a comprehensive and competitive review process that included proposals from multiple physician groups, including Eugene Emergency Physicians. The review focused on Lane County's future emergency medicine needs and the type of resource required to meet increasingly high patient volumes and clinical complexity. ApolloMD was chosen because it brings depth of experience, operational infrastructure, and demonstrated outcomes that align with PeaceHealth's long-term goals for access and quality.

ApolloMD has extensive experience operating **high-volume, high-acuity emergency departments**, including as a service provider to several departments with more than **80,000** annual visits and two



with more than 150,000. As patient complexity, ambulance traffic and community demand increase, PeaceHealth requires a partner with a proven ability to stabilize operations in rapidly growing emergency settings. **ApolloMD's record of managing high-volume environments distinguishes the organization as one capable of meeting today's challenges and planning for the future.**

### **ApolloMD Is Not Private Equity Owned (and Never Has Been)**

**ApolloMD operates as a physician-owned, physician-led organization, meaning it does not answer to private equity firms or other outside investors.** This structure reinforces PeaceHealth's emphasis on medical leadership, operational transparency and patient-focused decision-making. Because ApolloMD's leaders are practicing emergency physicians who work directly in clinical settings, they understand frontline realities and bring a level of accountability, responsiveness and clinical insight that aligns with PeaceHealth's Mission and Values. This model stood out during the evaluation process because it supports consistency across emergency departments while ensuring decisions remain rooted in patient care rather than investor interests.

ApolloMD is not, and has never been, owned, controlled or backed by private equity. The organization has been **privately held since its founding and has never pursued or accepted private equity investment.** Its prior ownership entity, ValorBridge, which included founders and active physician leaders, has also never been associated with private equity or outside stakeholders.

### **ApolloMD is Already a Proven PeaceHealth Partner**

PeaceHealth's confidence in ApolloMD is strengthened by **firsthand experience at PeaceHealth Ketchikan Medical Center.** When that emergency department experienced an abrupt service disruption, ApolloMD partnered with local leaders to stabilize operations, attract and retain physicians, **and improve patient experience scores.** This successful partnership demonstrated ApolloMD's ability to respond quickly, embed durable improvements and support both patient care and clinician well-being during challenging transitions. That record of performance was an important consideration for Lane County's emergency departments, which are navigating rapid growth.

PeaceHealth appreciates EEP physicians' decades of service to the community and continues to value their commitment and expertise. The decision **reflects the changing demands** placed on the emergency system and the **need for a partner equipped with national resources, large-scale operational experience** and a proven ability to enhance access and flow while supporting local physicians. **ApolloMD's ability to combine national best practices with local engagement** is central to PeaceHealth's belief that the organization is the right choice for Lane County's emergency departments.

### **This Is Not a Cost-Cutting Decision**

The transition to ApolloMD is **not** a cost-reduction strategy but part of a broader effort to expand capacity, improve patient flow and strengthen emergency care across Lane County. The organization has made **substantial financial investments in recent years** to meet rising demand, including adding



**23 new beds, 20 new care spaces** in the emergency department, **27 new nursing positions** and **205 additional caregiver hours per day** to support emergency operations. These enhancements reflect a commitment to reinforcing frontline staffing and expanding the space needed to manage sustained increases in high-acuity patients.

PeaceHealth has invested more than **\$25 million** over the past two years to expand access and clinical capacity, including a **\$6 million renovation of the RiverBend emergency department**, now underway. This project will further increase clinical care space, improve flow and help reduce bottlenecks as patient volume continues to rise. These capital improvements are paired with systemwide operational work and design changes intended to enhance reliability and reduce waiting during surges.

In addition to these investments, our goal is to grow emergency medicine services, unify care across Lane County and strengthen the long-term stability of its emergency departments. PeaceHealth and ApolloMD also share a commitment to maintaining well-staffed departments, emphasizing that competitive compensation is essential to attracting and retaining high-quality clinicians. This decision is **not about reducing physician compensation or lowering operating costs**. **PeaceHealth continues to invest in space, staffing and systems because strengthening the emergency care infrastructure is critical to ensuring patients can receive timely, reliable and safe care both now and in the future.**

### Clarifying Our Commitment to Local Emergency Physicians

We understand that the transition to ApolloMD has raised concern among clinicians and community members, and we are working to address several recurring misconceptions directly. One of the most significant clarifications is that **PeaceHealth is not replacing its emergency physicians with locums or physician assistants**. Both PeaceHealth and ApolloMD believe in the importance of physicians who live in and understand the communities they serve. ApolloMD has a strong track record of **recruiting and retaining emergency physicians**, and the emergency departments in Lane County will continue to operate under a **physician-led model**.

### What Patients & Community Can Expect

We will continue providing **uninterrupted emergency care** throughout this transition, and our teams remain focused on delivering safe, reliable service every day. Our emergency departments will continue to be staffed by **clinicians who care for this community**, supported by ApolloMD's national expertise. This approach reflects our commitment to clinical leadership and community-rooted care.

We are also continuing to **invest in improvements that reduce wait times and strengthen patient flow**, addressing the growing demands on our emergency departments. Above all, we remain grounded in our **Mission and Values**, ensuring every decision we make supports compassionate, high-quality care for the people we serve.



### PeaceHealth Conducted a Rigorous RFP

PeaceHealth carried out a thorough request-for-proposals (RFP) process to select a partner. The RFP process was initiated because EEP's contract was set to expire. **Six organizations were invited, with four submitting proposals.** One withdrew due to the demanding process, and another could not meet Oregon Senate Bill 951 requirements related to corporate structure. Proposals covered qualifications, experience, ability to recruit and retain quality staff, management platform sophistication, quality improvement programs and metrics, financial stability, transition planning, potential for collaboration, performance on operational and clinical indicators (including sample quality dashboards) and patient satisfaction results.

**A diverse group of seven PeaceHealth Oregon leaders, led by an experienced senior system leader, served on the RFP committee.** Participants included Drs. McGovern and Ruscher, along with leaders from nursing, finance and emergency departments.

**The committee adhered to best practices for RFP evaluation,** reviewing proposals on their individual merits. Each proposing organization participated in two interview rounds: the first to present themselves and ask questions about PeaceHealth and the RiverBend ED, and the second for committee members to seek clarification on the submitted proposal. The committee then evaluated each participant based on a scorecard of established criteria, held a deliberation session, and made a recommendation. Throughout, a non-voting system leader served as the sole point of contact, ensuring consistent and transparent communication, and the PeaceHealth legal team provided advice and oversight.

After careful scoring and deliberation, **the committee recommended awarding the contract to ApolloMD as the proposal best aligned with PeaceHealth Oregon's current and future needs.** PeaceHealth system leadership approved this recommendation. As a courtesy, Dr. McGovern informed EEP verbally of their non-selection before sending official notification letters to each participating organization.

The RFP process identified significant opportunities to enhance quality, access and clinician support by transitioning to a new organization, ApolloMD, including:

- **Proven success in process improvement:** ApolloMD provided detailed case studies demonstrating strong, hands-on support for process improvement initiatives that directly impact access and patient flow.
- **Strong clinical excellence infrastructure:** ApolloMD described mature programs for benchmarking, monitoring and supporting adherence to clinical quality metrics, ensuring consistent, evidence-based care across sites.
- **Robust commitment to patient satisfaction:** ApolloMD uses sophisticated patient satisfaction tracking and training tools with clear accountability at the clinician level.
- **Comprehensive clinician support:** ApolloMD has demonstrated success in recruitment and retention, formal leadership development and mentoring programs, and clinician wellness programs. This provides stability and support for our care teams.



- **Deep community integration:** ApolloMD has a strong record of retaining local clinicians and deploying regional leadership as “boots on the ground” workers to ensure true understanding of community needs and ensure care reflects those needs.
- **Physician focus:** ApolloMD is a physician-owned and physician-led medical group, not a staffing company. They are financially stable and are not backed by any private equity funds.

### **ApolloMD’s Practice Will Comply with Oregon’s Senate Bill 951**

ApolloMD will serve as the management services organization for Lane Emergency Physicians, a physician-owned practice. ApolloMD and Lane Emergency Physicians are committed to full compliance with Oregon’s SB 951 and will meet all requirements in advance of the transition dates.



Healthy Clinicians.  
Healthy Patients.  
**Healthy Communities.**

March 6, 2026

Representative Ben Bowman  
Representative Lisa Fragala  
Representative Nancy Nathanson  
Oregon House of Representatives  
900 Court Street NE, H-484  
Salem, Oregon 97301

*Via email to Hon. Ben Bowman ([rep.benbowman@oregonlegislature.gov](mailto:rep.benbowman@oregonlegislature.gov))*

Re: Your February 24, 2026 Letter Regarding SB 951 Compliance – Lane Emergency Physicians, LLC

Dear Representatives Bowman, Fragala, Nathanson:

Thank you for your February 24, 2026 letter and for your dedication to protecting patient centered, clinically independent emergency care across Oregon. We value your oversight and are pleased to provide the requested information, while reaffirming our commitment to full compliance with Senate Bill 951 and all relevant Oregon statutes.

Following a comprehensive and competitive Request for Proposal (RFP) process, PeaceHealth selected ApolloMD, in its capacity as a management services organization (“MSO”), to support the establishment of a physician-owned practice entity, Lane Emergency Physicians, LLC (“Lane”), and to provide non-clinical administrative services to Lane pursuant to an administrative services agreement. Lane will provide emergency department physician services at Sacred Heart Medical Center at RiverBend, Peace Harbor Medical Center, and Cottage Grove Community Medical Center. In early February 2026, ApolloMD and PeaceHealth commenced transition planning.

ApolloMD Business Services, LLC, an affiliate of ApolloMD (“ABS”), will serve solely as the management services organization to Lane, delivering non-clinical administrative and operational support pursuant to an administrative services agreement. All clinical judgment, patient care decisions, medical direction, and professional responsibilities will remain exclusively with Lane’s licensed Oregon physician owner and its clinicians, in full compliance with Oregon law, including Senate Bill 951. We are finalizing the formal governance and operational agreements and anticipate completion well before the June 1<sup>st</sup> and July 1<sup>st</sup>, 2026, service commencement dates.

In response to your request for information, and subject to completion of the various governance documents and operational agreements, we respond as follows:



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**1. The ownership structure of Lane Emergency Physicians, LLC, including the names and Oregon medical license numbers of the physician owners;**

Lane is structured as a physician-owned Oregon professional limited liability company. Upon completion of licensing and final documentation, Dr. John Philip Chapman will be the sole owner and member of Lane. Dr. Chapman is a board-certified emergency medicine physician with extensive clinical and leadership experience. He previously received an award for his work transforming an emergency department, fostering an environment of collaboration, compassion and excellence. Dr. Chapman's Oregon medical license application is pending and will be finalized prior to assuming ownership and well before any services are provided at PeaceHealth facilities. Upon completion, we will provide his Oregon license number and ownership documentation under separate cover or in a confidential briefing.

**2. The governance structure of Lane Emergency Physicians, LLC, including managers, members, officers, or directors, and the process for appointment and removal;**

As the sole owner and member, Dr. Chapman will also serve as the sole manager and hold all officer positions for Lane. This structure ensures direct physician control over all governance matters. Only Dr. Chapman, as sole member, may transfer ownership interests or appoint/remove managers/officers. ApolloMD and its affiliates have no role whatsoever in Lane's governance, ownership decisions, or officer appointments.

**3. The ownership and governance structure of any other corporate entities involved in the Peacehealth RiverBend contract, including any and all parent organizations and subsidiaries;**

The physician services contract will be solely between Lane Emergency Physicians, LLC and PeaceHealth Sacred Heart Medical Center at RiverBend. No other corporate entities are involved in the provision of clinical services. ABS provides only non-clinical administrative support to Lane.

**4. The identity and role of any management services organization (MSO) involved in Oregon operations;**

ABS will serve as the MSO to Lane and provide administrative services pursuant to an administrative services agreement.



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**5. The management services agreement(s), and any other agreements concerning operations, authority, or reserved powers, between ApolloMD, Lane Emergency Physicians, LLC, or any other affiliated corporate entity relating to the PeaceHealth RiverBend contract;**

Work is underway to finalize the administrative services agreement between Lane and ABS, but it will clearly delineate the separation between administrative support and clinical authority.

The administrative services agreement is expected to involve ABS support of Lane for various administrative tasks, including:

- Billing and collections;
- Payor contracting;
- HR and legal;
- Recruiting;
- Data management and analytics;
- Regulatory; and
- Other administrative services typically required of an MSO.

Importantly, ABS will have no authority over any of the following:

- The practice of medicine;
- Delivery of healthcare services;
- Determining how many patients a physician/clinician should see or hours to work;
- Which diagnostic tests are appropriate for patients;
- Need for patient referrals or consultation with other practitioners;
- Patient care or treatment options;
- Patient records;
- Terms of contractual relationships with third party payors;
- Coding or billing procedures for patient care;
- Which medical equipment and supplies to purchase;
- Selection, hiring or firing of physicians/clinicians related to clinical competency;
- Any activity that constitutes the practice of medicine or requires professional licensure; or
- Providing inducement or remuneration in exchange for recommending to patients any services provided by ABS.



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ABS will receive a fair market value management fee; all remaining revenue stays with Lane and its physician owner. We will provide the administrative services agreement (or key excerpts confirming the above) once final.

- 6. Any agreements defining which entities or persons have ultimate decision-making authority over administrative, business, or clinical operations of Lane Emergency Physicians, LLC that affect the nature or quality of medical care delivered by Lane Emergency Physicians, LLC, including physician staffing, scheduling, compensation methodology, billing/coding policy, and payor contracting; and**

The administrative services agreement to be entered into between Lane and ABS will outline the allocation of responsibilities between the parties. We do not expect any other agreements between Lane and ABS.

- 7. Whether any physician owner, manager, officer, or director of Lane Emergency Physicians, LLC receives compensation from any MSO owned by or affiliated with ApolloMD, and if so, the terms of that compensation.**

Dr. Chapman receives no compensation or other remuneration from ABS or any ApolloMD affiliate, or any MSO owned or affiliated with ApolloMD.

Over the past several weeks, including during yesterday's Senate hearing, there have been repeated references to ApolloMD's alleged affiliation with private equity. We take this opportunity to state unequivocally that we are a privately held company that is not, and has never been, under private equity ownership or control. We are, and have always been, privately held since our humble beginnings operating out of the basement of our first hospital partner. Although private equity firms have periodically approached us over our 40+ year history, we have never pursued or accepted such investment. ApolloMD is owned by 300+ of our physicians, advanced practice clinicians, and employees, some of which hold their ownership interests indirectly through holding companies. We also share concerns about private equity influence in healthcare and are dedicated to ensuring clinical decisions remain independent and in the best interest of patients.

Questions have also been raised regarding an entity named ValorBridge. ValorBridge is ApolloMD's legacy ownership entity through which our founders and active physician leaders originally invested in ApolloMD, as well as unrelated business opportunities. ValorBridge is similarly not owned nor associated with any outside private equity and has no external stakeholders. None of these entities have any outsider ownership and all involved individuals helped build the organization we have today.



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**Healthy Communities.**

We would be pleased to meet with you, your staff, or designated representatives virtually or in person to review redacted materials and address any further questions.

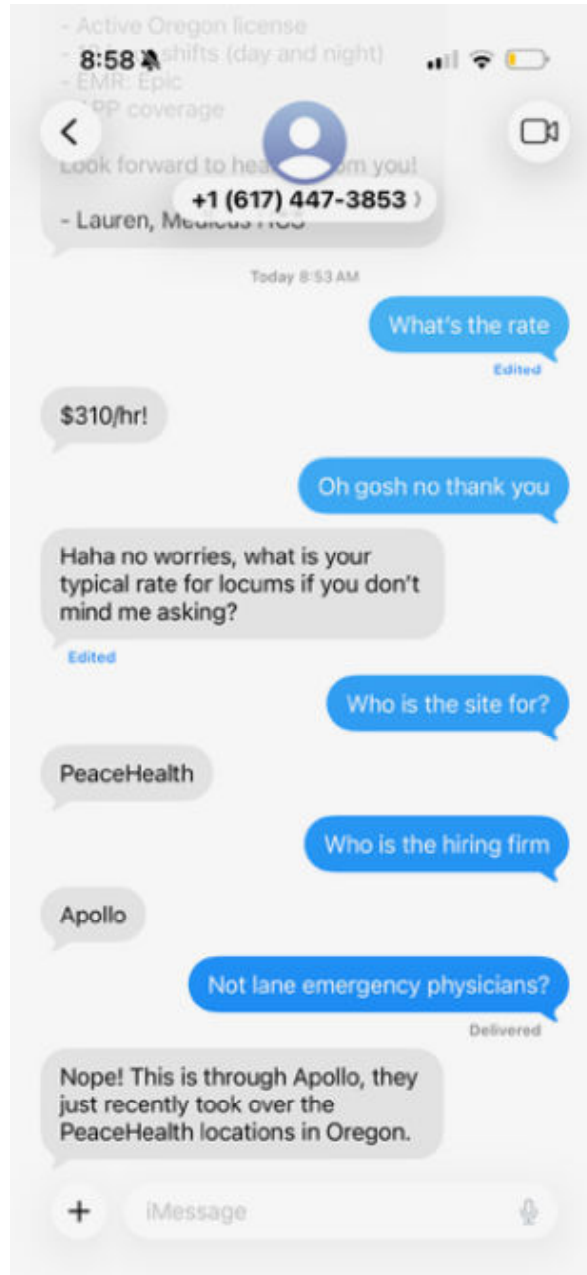
Thank you for your engagement on this matter. ApolloMD and Lane Emergency Physicians, LLC are fully committed to delivering safe, high-quality emergency care to Oregonians in strict compliance with state law, and we look forward to earning the confidence of the communities we will serve.

Sincerely,

A handwritten signature in black ink, appearing to read "Yogin Patel", is written over a light gray circular background.

Yogin Patel, M.D.  
CEO  
On Behalf of ApolloMD

Cc Dr. James McGovern, Chief Hospital Executive, PeaceHealth Oregon



Todd R. Johnston, OSB 992913  
tjohnston@hershnerhunter.com  
Alexandra P. Hilsher, OSB 114218  
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Hershner Hunter, LLP  
675 Oak St., Ste. 400  
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Telephone: (541) 686-8511  
Facsimile: (541) 344-2025

Of Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
EUGENE DIVISION

KAREN STAPLETON, as guardian *ad litem*  
for JANE STAPLETON; DAN McGEE, MD,  
PhD, an individual and licensed medical  
practitioner; and EUGENE EMERGENCY  
PHYSICIANS, P.C., an Oregon professional  
corporation;

Plaintiffs,

v.

PEACEHEALTH, a Washington nonprofit  
corporation; APOLLOMD, INC., a Georgia  
corporation; APOLLOMD BUSINESS  
SERVICES, LLC; LANE EMERGENCY  
PHYSICIANS LLC, an Oregon limited  
liability corporation; and DOES 1 - 5;

Defendants.

Case No. 6:26-cv-00684-MTK

DECLARATION OF COREY ORTON,  
MD

In Support Of Plaintiffs' Motion For An  
Order To Show Cause Why Preliminary  
Injunction Should Not Issue

I, Corey Orton, MD, hereby declare:

1. I make this declaration based upon my personal knowledge.

2. I am the President of Radiology Associates, P.C. (“RAPC”), and have been with RAPC and Oregon Imaging Centers, L.L.C. since 2016. I am also the Chair of Radiology/Pathology for Sacred Heart Riverbend and Medical Director for Radiology at Sacred Heart Riverbend and Cottage Grove Medical Center.

3. I understand that PeaceHealth has awarded a contract to ApolloMD for the provision of emergency medical services at its Lane County Hospitals.

4. Despite participation in multiple meetings with Defendants’ “transition teams,” it is not clear and there has been no actual explanation of, a meaningful plan, let alone strategy for implementing that plan.

5. I am a member of the medical staff and Medical Executive Committee of Sacred Heart Riverbend. If the plan that has been articulated to me by PeaceHealth and ApolloMD is executed, Lane County patients will be at significant risk and the quality and availability of emergency medical care, and even non-emergency medical care, will be significantly reduced.

5. Regardless of whether the underlying arrangements are legal or not, the rapid transition of emergency care to an entirely new group of Emergency Medicine providers will result in extraordinary inefficiencies and reduced quality of care. This is not a statement on the inherent quality of the incoming professionals, but rather the realities of a wholesale dismantling and reforming of an entire department tasked with being a regional safety net and referral center as well as a level 2 trauma center and a stroke center over the course of just a few weeks.


6. One of the outcomes that will directly affect RAPC will be the demand for additional imaging and image guided intervention that is inherent in the practice of locums (non-resident, temporary physicians) medicine where the providers are not well versed in the systems in which they are working. Even the few full-time replacement providers will not have the institutional memory to efficiently navigate the local system, to the point they will not be able to provide guidance and advice to the locums providers filling in the staffing gaps caused by this

rapid wholesale replacement. This will lead to additional systemic cost, longer wait times for imaging not just for emergency and hospital-admitted patients, but also outpatients who rely on the hospital to provide their complex imaging (including specifically pediatric patients and those who have implantable devices or may require anesthesia), and an overall increased stress on the delivery of medical care.

7. These changes have the potential to increase Diagnostic as well as Interventional Radiologist burnout, decrease our ability to recruit to the area, and long term may impact our ability to provide the excellent level of care we currently are able to deliver to the community.

**I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.**

Dated: 4/7/2026

Signed by:  
  
4C7293E0E0C64FE  
Corey Orton, MD

Todd R. Johnston, OSB 992913  
tjohnston@hershnerhunter.com  
Alexandra P. Hilsher, OSB 114218  
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Facsimile: (541) 344-2025

Of Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
EUGENE DIVISION

KAREN STAPLETON, as guardian *ad litem*  
for JANE STAPLETON; DAN McGEE, MD,  
PhD, an individual and licensed medical  
practitioner; and EUGENE EMERGENCY  
PHYSICIANS, P.C., an Oregon professional  
corporation;

Plaintiffs,

v.

PEACEHEALTH, a Washington nonprofit  
corporation; APOLLOMD, INC., a Georgia  
corporation; APOLLOMD BUSINESS  
SERVICES, LLC; LANE EMERGENCY  
PHYSICIANS LLC, an Oregon limited  
liability corporation; and DOES 1 - 5;

Defendants.

Case No. 6:26-cv-00684-MTK

DECLARATION OF JUDITH SABAH,  
MD, PHD, MBA

In Support Of Plaintiffs' Motion For An  
Order To Show Cause Why Preliminary  
Injunction Should Not Issue

I, Dr. Judith Sabah, hereby declare:

1. I make this declaration based upon my personal knowledge.

2. I am one of the owners of Eugene Eye Care Associates, P.C. doing business as Eugene Eye Care Associates and Advanced Eye Care Associates (“Eugene Eye Care Associates”), and have been with Eugene Eye Care Associates since July 2019. Eugene Eye Care Associates has and continues to provide emergency services at PeaceHealth’s Riverbend facility.

3. I understand that PeaceHealth has awarded a contract to ApolloMD for the provision of emergency medical services at its Lane County Hospitals.

4. If the current plan, as explained by PeaceHealth and ApolloMD is executed, Lane County patients will be at significant risk and the quality and availability of emergency medical care, and even non-emergency medical care, will be significantly reduced.

5. Regardless of whether the underlying arrangements are legal or not, the rapid transition of emergency care to new physicians will also result in extraordinary inefficiencies and reduced quality of care. If the transition that PeaceHealth and ApolloMD have described happens, patients will be at significant risk.

6. One of the outcomes that will directly affect Eugene Eye Care Associates will be inefficiencies inherent with working with locums physicians (non-resident, temporary physicians) who are unfamiliar with Eugene Eye Care Associates’ physicians, hospital procedures and the local medical community. This will lead to additional cost, additional wait times and an overall increased stress on the delivery of medical care.

**I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.**

Dated: 4/7/2026

DocuSigned by:

*Judith Sabah, MD, PhD, MBA*

DD2498524B2E4CF

Judith Sabah, MD, PhD, MBA

Todd R. Johnston, OSB 992913  
tjohnston@hershnerhunter.com  
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Telephone: (541) 686-8511  
Facsimile: (541) 344-2025

Of Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
EUGENE DIVISION

KAREN STAPLETON, as guardian *ad litem*  
for JANE STAPLETON; DAN McGEE, MD,  
PhD, an individual and licensed medical  
practitioner; and EUGENE EMERGENCY  
PHYSICIANS, P.C., an Oregon professional  
corporation;

Plaintiffs,

v.

PEACEHEALTH, a Washington nonprofit  
corporation; APOLLOMD, INC., a Georgia  
corporation; APOLLOMD BUSINESS  
SERVICES, LLC; LANE EMERGENCY  
PHYSICIANS LLC, an Oregon limited  
liability corporation; and DOES 1 - 5;

Defendants.

Case No. 6:26-cv-00684-MTK

DECLARATION OF ALLAN A.  
HUNTER, MD

In Support Of Plaintiffs' Motion For An  
Order To Show Cause Why Preliminary  
Injunction Should Not Issue

I, Dr. Allan A. Hunter, hereby declare:

1. I make this declaration based upon my personal knowledge.

2. I am one of the owners of Oregon Eye Consultants, P.C. (“Oregon Eye Consultants”), and have been with Oregon Eye Consultants since May 2018. Oregon Eye Consultants has and continues to provide emergency services at PeaceHealth’s Riverbend facility.

3. I understand that PeaceHealth has awarded a contract to ApolloMD for the provision of emergency medical services at its Lane County Hospitals.

4. If the current plan, as explained by PeaceHealth and ApolloMD is executed, Lane County patients will be at significant risk and the quality and availability of emergency medical care, and even non-emergency medical care, will be significantly reduced.


5. Regardless of whether the underlying arrangements are legal or not, the rapid transition of emergency care to new physicians will also result in extraordinary inefficiencies and reduced quality of care. If the transition that PeaceHealth and ApolloMD have described happens, patients will be at significant risk.

6. One of the outcomes that will directly affect Oregon Eye Consultants will be inefficiencies inherent with working with locums physicians (non-resident, temporary physicians) who are unfamiliar with Oregon Eye Consultants’ physicians, hospital procedures and the local medical community. This will lead to additional cost, additional wait times and an overall increased stress on the delivery of medical care.

7. If the status quo is not immediately preserved, the impacts to the delivery of emergency medical care and the unavailability of care will begin occur well before the announced transition dates in May and June and those impacts will likely be irreversible.

**I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.**

Dated: 4/8/2026

Signed by:   
 CB7B285CFE7A4AC...  
 Allan A. Hunter, MD

Todd R. Johnston, OSB 992913  
tjohnston@hershnerhunter.com  
Alexandra P. Hilsher, OSB 114218  
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Telephone: (541) 686-8511  
Facsimile: (541) 344-2025

Of Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
EUGENE DIVISION

KAREN STAPLETON, as guardian *ad litem*  
for JANE STAPLETON; DAN McGEE, MD,  
PhD, an individual and licensed medical  
practitioner; and EUGENE EMERGENCY  
PHYSICIANS, P.C., an Oregon professional  
corporation;

Plaintiffs,

v.

PEACEHEALTH, a Washington nonprofit  
corporation; APOLLOMD, INC., a Georgia  
corporation; APOLLOMD BUSINESS  
SERVICES, LLC; LANE EMERGENCY  
PHYSICIANS LLC, an Oregon limited  
liability corporation; and DOES 1 - 5;

Defendants.

Case No. 6:26-cv-00684-MTK

DECLARATION OF ROBERT M.  
BEARDSLEY, MD

In Support Of Plaintiffs' Motion For An  
Order To Show Cause Why Preliminary  
Injunction Should Not Issue

I, Dr. Robert M. Beardsley, hereby declare:

1. I make this declaration based upon my personal knowledge.

2. I am one of the owners of Oregon Eye Consultants, P.C. (“Oregon Eye Consultants”), and have been with Oregon Eye Consultants since 2008. Oregon Eye Consultants has and continues to provide emergency services at PeaceHealth’s Riverbend facility.

3. I understand that PeaceHealth has awarded a contract to ApolloMD for the provision of emergency medical services at its Lane County Hospitals.

4. If the current plan, as explained by PeaceHealth and ApolloMD is executed, Lane County patients will be at significant risk and the quality and availability of emergency medical care, and even non-emergency medical care, will be significantly reduced.

5. Regardless of whether the underlying arrangements are legal or not, the rapid transition of emergency care to new physicians will also result in extraordinary inefficiencies and reduced quality of care. If the transition that PeaceHealth and ApolloMD have described happens, patients will be at significant risk.

6. One of the outcomes that will directly affect Oregon Eye Consultants will be inefficiencies inherent with working with locums physicians (non-resident, temporary physicians) who are unfamiliar with Oregon Eye Consultants’ physicians, hospital procedures and the local medical community. This will lead to additional cost, additional wait times and an overall increased stress on the delivery of medical care.

7. If the status quo is not immediately preserved, the impacts to the delivery of emergency medical care and the unavailability of care will begin occur well before the announced transition dates in May and June and those impacts will likely be irreversible.

**I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.**

Dated: 4/7/2026

DocuSigned by:  
*Robert M. Beardsley, MD*  
CF3E503B9A494E9  
Robert M. Beardsley, MD

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tjohnston@hershnerhunter.com  
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Telephone: (541) 686-8511  
Facsimile: (541) 344-2025

Of Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
EUGENE DIVISION

KAREN STAPLETON, as guardian *ad litem*  
for JANE STAPLETON; DAN McGEE, MD,  
PhD, an individual and licensed medical  
practitioner; and EUGENE EMERGENCY  
PHYSICIANS, P.C., an Oregon professional  
corporation;

Plaintiffs,

v.

PEACEHEALTH, a Washington nonprofit  
corporation; APOLLOMD, INC., a Georgia  
corporation; APOLLOMD BUSINESS  
SERVICES, LLC; LANE EMERGENCY  
PHYSICIANS LLC, an Oregon limited  
liability corporation; and DOES 1 - 5;

Defendants.

Case No. 6:26-cv-00684-MTK

DECLARATION OF CHRISTOPHER  
ROMPALA, RN, BSN

In Support Of Plaintiffs' Motion For An  
Order To Show Cause Why Preliminary  
Injunction Should Not Issue

I, Christopher Rompala, RN, BSN, on behalf of the Oregon Nurses Association (“ONA”) hereby declare:

1. I make this declaration based upon my personal and professional knowledge.
2. I am a registered nurse who works in the operating room at PeaceHealth Riverbend and have practiced in the PeaceHealth hospitals in Lane County, Oregon since 2014. Additionally, I am chair of the ONA bargaining unit at PeaceHealth Riverbend and a member of ONA's statewide board of directors.
3. I understand that PeaceHealth has awarded a contract to ApolloMD for the provision of emergency medical services at its Lane County Hospitals.
4. If the current plan, as explained by PeaceHealth and ApolloMD is executed, Lane County patients will be at significant risk and the quality and availability of emergency medical care, and even non-emergency medical care, will be significantly reduced.
5. Regardless of whether the underlying arrangements are legal or not, the rapid transition of emergency care to new physicians will also result in extraordinary inefficiencies and reduced quality of care.
6. Recently, PeaceHealth has needed to hire an unprecedented number of new nurses to fill extensive vacancies. Many of these new hires are recent nursing school graduates. Traditionally, new graduates need additional time and support from experienced physicians and nurses. It will be more difficult and time-consuming to onboard and train new graduates while onboarding and training new emergency department physicians. This will likely lead to increased wait times for patients.
7. Many nurses and providers at PeaceHealth Riverbend have indicated they may leave their positions due to PeaceHealth executive's decision to terminate the EEP and other factors. This will exacerbate our community's healthcare crisis and make it more challenging for community members to receive timely care.
8. My colleagues in the operating room work closely with emergency department providers. Our established working relationship is essential for facilitating care in the operating

room. It is essential that patients who arrive at the emergency department and are transferred to the operating room are treated quickly and professionally. Creating new relationships between a new external team of doctors and current staff at Riverbend will take significant time and energy which may slow processes and procedures and ultimately delay patient care.

9. Patients are already reaching out to nurses with concerns about accessing healthcare at PeaceHealth and are choosing to seek other care options due to PeaceHealth’s planned emergency department physician transition. Community members delaying care or traveling farther to access healthcare negatively affects individual and community health in Lane County and beyond.

10. Fundamentally, if the status quo is not preserved until a time when there is a more reasoned and transparent transition plan, patients in Lane County will be at risk and have dramatically reduced access to medical care as well as a fundamentally lower quality of care.

**I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.**

Dated: 4/7/2026

Signed by:  
*Christopher Kompala, RN, BSN*  
2B1561BF26A9477...  
Christopher Kompala, RN, BSN

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tjohnston@hershnerhunter.com  
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Telephone: (541) 686-8511  
Facsimile: (541) 344-2025

Of Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
EUGENE DIVISION

KAREN STAPLETON, as guardian *ad litem*  
for JANE STAPLETON; DAN McGEE, MD,  
PhD, an individual and licensed medical  
practitioner; and EUGENE EMERGENCY  
PHYSICIANS, P.C., an Oregon professional  
corporation;

Plaintiffs,

v.

PEACEHEALTH, a Washington nonprofit  
corporation; APOLLOMD, INC., a Georgia  
corporation; APOLLOMD BUSINESS  
SERVICES, LLC; LANE EMERGENCY  
PHYSICIANS LLC, an Oregon limited  
liability corporation; and DOES 1 - 5;

Defendants.

Case No. 6:26-cv-00684-MTK

DECLARATION OF ROSE  
FANTOZZI, RN, BSN

In Support Of Plaintiffs' Motion For An  
Order To Show Cause Why Preliminary  
Injunction Should Not Issue

I, Rose Fantozzi, RN, BSN on behalf of the Oregon Nurses Association (“ONA”) hereby  
declare:

1. I make this declaration based upon my personal and professional knowledge.
2. I am a registered nurse who works in the emergency room at PeaceHealth Riverbend and have practiced in the PeaceHealth hospitals in Lane County, Oregon since 1995.
3. I understand that PeaceHealth has awarded a contract to ApolloMD for the provision of emergency medical services at its Lane County Hospitals.
4. If the current plan, as explained by PeaceHealth and ApolloMD is executed, Lane County patients will be at significant risk and the quality and availability of emergency medical care, and even non-emergency medical care, will be significantly reduced.
5. Regardless of whether the underlying arrangements are legal or not, the rapid transition of emergency care to new physicians will also result in extraordinary inefficiencies and reduced quality of care.
6. Several of the inevitable results that will directly affect patients and providers is a dramatic increase in the wait times and “wall times” experienced, as staff is forced to adapt to working with new providers while treating record numbers of patients.
7. The nurses and medical staff at the hospital have a long and well-established working relationship and rapport with the current physician team at EEP. This special relationship will be difficult to recreate with new, possibly temporary physicians from ApolloMD even under optimal conditions.
8. Furthermore, this transition is scheduled to take place during the summer months, a historically busy time for the hospital’s emergency department. During this busy season we see and treat extraordinary numbers of trauma patients. Healthcare providers rely on our established working relationships in order to care for and facilitate care of trauma patients from our local community and the surrounding areas.

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9. Fundamentally, if the status quo is not preserved until a time when there is a more reasoned and transparent transition plan, patients in Lane County will be at risk and have dramatically reduced access to medical care as well as a fundamentally lower quality of care.

**I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.**

Dated: 4/7/2026

Signed by:  
*Rose Fantozzi, RN, BSN*  
83C4E53C2DD448B...  
\_\_\_\_\_  
Rose Fantozzi, RN, BSN

Todd R. Johnston, OSB 992913  
tjohnston@hershnerhunter.com  
Alexandra P. Hilsher, OSB 114218  
ahilsher@hershnerhunter.com  
Hershner Hunter, LLP  
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Eugene, OR 97401  
Telephone: (541) 686-8511  
Facsimile: (541) 344-2025

Of Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
EUGENE DIVISION

KAREN STAPLETON, as guardian *ad litem*  
for JANE STAPLETON; DAN McGEE, MD,  
PhD, an individual and licensed medical  
practitioner; and EUGENE EMERGENCY  
PHYSICIANS, P.C., an Oregon professional  
corporation;

Plaintiffs,

v.

PEACEHEALTH, a Washington nonprofit  
corporation; APOLLOMD, INC., a Georgia  
corporation; APOLLOMD BUSINESS  
SERVICES, LLC; LANE EMERGENCY  
PHYSICIANS LLC, an Oregon limited  
liability corporation; and DOES 1 - 5;

Defendants.

Case No. 6:26-cv-00684-MTK

DECLARATION OF BRETT DEEDON

In Support Of Plaintiffs' Motion For An  
Order To Show Cause Why Preliminary  
Injunction Should Not Issue

I, Brett Deedon on behalf of Local 851 hereby declare:

1. I make this declaration based upon my personal and professional knowledge.

2. I am a Paramedic and the President of Local 851 Lane Professional Firefighters and have practiced in Lane County, Oregon since 2018.

3. I understand that PeaceHealth has awarded a contract to ApolloMD for the provision of emergency medical services at its Lane County Hospitals.

4. If the current plan, as explained by PeaceHealth and ApolloMD is executed, Lane County patients will be at significant risk and the quality and availability of emergency medical care, and even non-emergency medical care, will be significantly reduced.

5. Regardless of whether the underlying arrangements are legal or not, the rapid transition of emergency care to new physicians will also result in extraordinary inefficiencies and reduced quality of care.

6. Several of the inevitable results that will directly affect patients and providers is a dramatic increase in the wait times experienced, as well as a fundamentally lower quality of care.

7. Fundamentally, if the status quo is not preserved until a time when there is a more reasoned and transparent transition plan, patients in Lane County will be at risk and may have dramatically reduced access to medical care.

8. Eugene Springfield Fire (ESF) is the largest publicly ran ambulance provider in the state of Oregon. ESF responds to approximately 50,000 calls for service annually resulting in approximately 28,000 transports, 90% of which are to Peace Health Riverbend ED Pre hospital emergency care (the ambulance) is required by the Oregon Health Authority that their EMT's operate under written protocol. Additionally, the ambulance must have emergent access to medical control, a physician available at the receiving facility familiar with their protocol, to order more advanced care and procedures when called for. There has been no plan or discussion regarding how this will be accomplished with the new staffing plan with physicians that are "transient", unfamiliar, and likely not invested in the system or community. Furthermore, without a plan in

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place this change stands to immediately degrade ongoing quality assurance of prehospital care and continuity of care.

**I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.**

Dated: 4/7/2026

Signed by:  
  
R0FF965870644E3  
\_\_\_\_\_  
Brett Deedon

Todd R. Johnston, OSB 992913  
tjohnston@hershnerhunter.com  
Alexandra P. Hilsher, OSB 114218  
ahilsher@hershnerhunter.com  
Hershner Hunter, LLP  
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Facsimile: (541) 344-2025

Of Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
EUGENE DIVISION

KAREN STAPLETON, as guardian *ad litem*  
for JANE STAPLETON; DAN McGEE, MD,  
PhD, an individual and licensed medical  
practitioner; and EUGENE EMERGENCY  
PHYSICIANS, P.C., an Oregon professional  
corporation;

Plaintiffs,

v.

PEACEHEALTH, a Washington nonprofit  
corporation; APOLLOMD, INC., a Georgia  
corporation; APOLLOMD BUSINESS  
SERVICES, LLC; LANE EMERGENCY  
PHYSICIANS LLC, an Oregon limited  
liability corporation; and DOES 1 - 5;

Defendants.

Case No. 6:26-cv-00684-MTK

DECLARATION OF KAREN  
STAPLETON

In Support Of Plaintiffs' Motion For An  
Order To Show Cause Why Preliminary  
Injunction Should Not Issue

I, Karen Stapleton, hereby declare:

1. I make this declaration based upon my personal knowledge.

2. I am the mother and appointed guardian ad litem of Jane Stapleton.
3. Jane is a minor who has lived in Eugene her entire life.
4. Jane is a former patient at PeaceHealth's Sacred Heart Medical Center at Riverbend, received emergency services there, and because of an underlying health condition, Jane is likely to need emergency medical care in the future.

**I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.**

Dated: 4/7/2026

DocuSigned by:  
*Karen Stapleton*  
147C92B0EB4E41E  
\_\_\_\_\_  
Karen Stapleton

Todd R. Johnston, OSB 992913  
tjohnston@hershnerhunter.com  
Alexandra P. Hilsher, OSB 114218  
ahilsher@hershnerhunter.com  
Hershner Hunter, LLP  
675 Oak St., Ste. 400  
Eugene, OR 97401  
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Of Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
EUGENE DIVISION

KAREN STAPLETON, as guardian *ad litem*  
for JANE STAPLETON; DAN McGEE, MD,  
PhD, an individual and licensed medical  
practitioner; and EUGENE EMERGENCY  
PHYSICIANS, P.C., an Oregon professional  
corporation;

Plaintiffs,

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PEACEHEALTH, a Washington nonprofit  
corporation; APOLLOMD, INC., a Georgia  
corporation; APOLLOMD BUSINESS  
SERVICES, LLC; LANE EMERGENCY  
PHYSICIANS LLC, an Oregon limited  
liability corporation; and DOES 1 - 5;

Defendants.

Case No. 6:26-cv-00684-MTK

DECLARATION OF LAURIE  
PARRISH

In Support Of Plaintiffs' Motion For An  
Order To Show Cause Why Preliminary  
Injunction Should Not Issue

I, Laurie Parrish, hereby declare as follows:

1. I am a paralegal with Hershner Hunter, LLP, attorneys for Plaintiffs in the above matter. I make this statement based upon my own personal knowledge or upon my review of

records kept by the law firm of Hershner Hunter, LLP, of acts, events, conditions, or opinions, which records were made at or near the time of the act, event, condition, or opinion, by or from information transmitted by a person with knowledge of the act, event, condition, or opinion, whose regular practice it was to create such records, and which records are kept in the course of the regularly conducted business of the firm. I make this declaration in support of Plaintiffs' Motion for an Order to Show Cause Why Preliminary Injunction Should Not Issue.

2. Attached hereto as Exhibit 1 is a true copy of an article "*From Corporate to Care: Dr. Chapman's Inspiring Journey to Medicine as a Second Career*" published on ApolloMD's website, that I located on April 6, 2026, (<https://apolloomd.com/blog/from-corporate-to-care-dr-chapmans-inspiring-journey-to-medicine-as-a-second-career/>).

3. Attached hereto as Exhibits 2, 3, and 4 are true copies of advertisements published on AplloMD's website, that I located on April 6, 2026, (<https://apolloomd.com/jobs/?viewCareer=list-tab&locationCareer%5B%5D=oregon&categoryCareer=&specialtyCareer=>).

4. On April 6, 2026, I searched the Business Name Search page of the Secretary of State, Corporation Division website and there were no entities registered in Oregon containing the name "ApolloMD" ([https://egov.sos.state.or.us/br/pkg\\_web\\_name\\_srch\\_inq.login](https://egov.sos.state.or.us/br/pkg_web_name_srch_inq.login)).

5. Attached hereto as Exhibit 5 is a true copy of Lane Emergency Physicians LLC's Articles of Organization filed with the Oregon Secretary of State.

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6. Attached hereto as Exhibit 6 is a true copy of the Licensee Search for John Chapman published on the Oregon Medical Board website, that I located on April 6, 2026 (<https://omb.oregon.gov/Clients/ORMB/Public/Verification.aspx>).

**I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.**

Dated: 4/7/2026

DocuSigned by:  
*Laurie Parrish*  
62B7129E8AB94AA  
\_\_\_\_\_  
Laurie Parrish

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# From Corporate to Care: Dr. Chapman's Inspiring Journey to Medicine as a Second Career



The path to becoming a physician is rarely straightforward, but few stories are as compelling as Dr. Chapman's. After a successful career in healthcare IT, Dr. Chapman made the bold decision to transition to medicine—a move that has since earned him

recognition as ApolloMD's Medical Director of the Year. His story, marked by perseverance, self-discovery, and a deep commitment to service, offers invaluable lessons for aspiring physicians, especially those who might be considering medicine as a second career.

## A Foundation Rooted in Service

Growing up in Kansas City, Missouri, and moving frequently due to his father's corporate career, Dr. Chapman learned adaptability at an early age. Despite the challenges of changing schools every two years, his upbringing was steeped in values of community service and giving back. His family's dedication to helping others, from volunteering in soup kitchens to international mission trips, laid the foundation for his eventual calling in medicine.



"It wasn't one key moment," Dr. Chapman reflects, "but a childhood full of service and giving. It's simply what my family did." This ethos of service carried through his early career and eventually directed him toward a profession where he could make a tangible difference—medicine.

## The First Career: Healthcare IT

Before donning the white coat, Dr. Chapman spent six years in healthcare IT at Cerner/Oracle. His early career saw him living abroad in Dubai, London, and Berlin, with the opportunity to witness healthcare systems across the globe. But despite the career success, something was missing.

"I enjoyed my job and did well," he explains. "But after a few years, I realized I wanted a more focused career—a vocation." This realization led him to pursue a Master's in Healthcare Administration at the University of North Carolina at Chapel Hill. Yet, it was during this time that he had a moment of self-actualization, realizing that his true calling was in clinical medicine.

## The Leap to Medicine

Making the leap to medical school wasn't easy—Dr. Chapman was 30 years old when he found himself in classrooms filled with 18-year-olds. "The imposter syndrome was real," he admits. But he drew strength from the examples of resilience set by his family, particularly his grandmother, who overcame numerous hardships to achieve a successful career in education and philanthropy.



For Dr. Chapman, medicine wasn't just a career change—it was a second calling. He recalls the profound impact of the 2010 Haiti earthquake, which further solidified his decision to pursue medicine. "I realized that if I wanted to make the most change, I needed to become a healthcare worker, not just a public health advocate," he says.

## Overcoming Challenges and Doubt

The road to becoming a physician is notoriously difficult, and Dr. Chapman's journey was no exception. He faced doubts along the way, missing out on significant life events like friends' weddings and spending time far from family. However, the support of his peers, his wife, and the friendships he made during medical school helped him push through. "It was tough," he admits, "but at the end of it all, I became an Emergency Medicine doctor, which I think is the best specialty in the best field of work."

Dr. Chapman's transition into medicine didn't just lead to personal fulfillment—it also allowed him to become a leader in his field. After completing his residency, he accepted the role of Medical Director at Riverside Medical Center, a position in which he has truly thrived.

## Leading by Example at Riverside Medical Center

When Dr. Chapman took on the role of Medical Director at Riverside, the hospital was undergoing a period of transition. ApolloMD had

recently taken over staffing and management of the Emergency Department, and he was the fourth medical director in just two years. His leadership approach? Steady, compassionate, and grounded in evidence-based medicine.

"I focused on providing steady leadership," Dr. Chapman explains, "by making myself available, listening to nursing leadership, and reassuring my team." His efforts

were instrumental in improving patient satisfaction and streamlining clinical processes, including stroke protocols and emergency department orders, resulting in significant operational improvements.

Under his leadership, Riverside Medical Center achieved a 50% door-to-needle time for stroke care of under 45 minutes, and the ED's patient satisfaction soared above the 90th percentile. These remarkable achievements were the result of teamwork, a fact Dr. Chapman is quick to point out. "I have passionate team members across the board, from nursing leadership to Advanced Practice Clinicians. Without them, it wouldn't matter how hard I worked."

## Director of the Year

In recognition of his outstanding leadership and commitment to patient care, Dr. Chapman was named ApolloMD's Medical Director of the Year. This prestigious award highlights not only his clinical acumen but also his ability to inspire and uplift those around him. His leadership has transformed the Emergency Department at Riverside, fostering an environment of collaboration, compassion, and excellence.

## A Message for Aspiring Physicians

For those considering a career in medicine later in life, Dr. Chapman offers a simple yet profound piece of advice: "How many lives do you plan on living? If medicine is truly something you are passionate



about, I can't imagine letting age get in the way. It is hard, no doubt, but the reward is immense."

Dr. Chapman's journey from healthcare IT to emergency medicine is a testament to the power of perseverance, service, and the pursuit of purpose. His story resonates deeply with those who seek to make a difference, not just through their work, but through their commitment to others. At ApolloMD, he has found a place where his values align with his vocation, and where his passion for medicine continues to inspire those around him.

For physicians seeking to join a team where compassionate care and clinical excellence are not just goals but daily practices, Dr. Chapman's story serves as a powerful example of what's possible at ApolloMD. Here, you won't just find a job—you'll find a calling.

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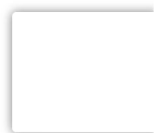
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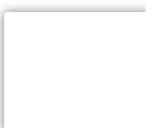
    



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# PeaceHealth Sacred Heart Medical Center RiverBend – Emergency Medicine

PeaceHealth Sacred Heart Medical Center at RiverBend is part of the PeaceHealth health system—a Catholic, not-for-profit healthcare network—the medical center is one of the largest and most advanced hospitals in Oregon, serving patients from Lane County and across southern and coastal Oregon. As a



Level II Trauma Center, RiverBend operates 24/7 with comprehensive emergency services and the capability to provide definitive care for severe adult and pediatric trauma. It is a primary destination for complex and urgent medical needs across a broad multi-county region.

- Annual Volume: 85,000
- ED Beds: 44
- Documentation: EPIC
- Physician Daily Coverage: 96 Hours (8-hour shifts)
- APC Daily Coverage: 30 hours
- Full time \$315-365+/hour

Springfield , Oregon | Emergency Medicine | PeaceHealth

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\* Required fields.

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Title \*

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Board Certification \*

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Specialty \*

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Your Phone Number

Current Citizenship Status \*

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States Licensed

List States

State of Interest

List States

Relocation \*

Are you willing to relocate?

Yes  No

Current Residency Status \*

Are you currently in a medical residency program?

Yes  No

Earliest Available Start Date \*

When are you available to start working?

mm/dd/yyyy

Email \*

Your Email Address

Message to Recruiter

Write your message

Upload Your CV \*

[Choose File](#) No file chosen

Accepted file types: pdf, doc, docx, Max. file size: 256 MB.

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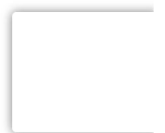
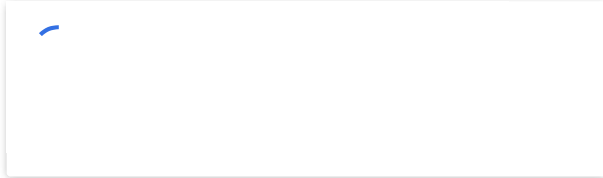


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## Springfield, Oregon

Springfield, Oregon offers a great balance of small-city comfort and easy access to big-city amenities. Located in the southern Willamette Valley, it has a welcoming, community-focused feel and scenic surroundings just minutes from Eugene. Outdoor recreation is part of everyday life, with the McKenzie and Willamette Rivers, local parks, and miles of trails for biking, hiking, and fishing. Weekend trips to the Oregon Coast, waterfalls, or the Cascade Mountains are all within easy reach. Springfield's revitalized downtown features breweries, coffee shops, art spaces, and local events, while neighboring Eugene adds festivals, live music, University of Oregon activities, and a vibrant food scene. Together, the two cities offer affordable neighborhoods, outdoor adventure, and cultural amenities — without the congestion of a large metro area.





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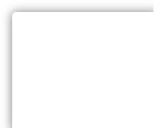
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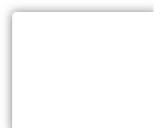
    



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# PeaceHealth Peace Harbor Medical Center – Emergency Medicine

The Peace Harbor Emergency Department is a Level III Trauma Center, serving the Oregon Coast with people and technology that are ready to handle any life-threatening emergency with Board Certified Emergency Physicians, Surgeons and highly trained nursing and support staff.



- Annual Volume: 13,000
- ED Beds: 11
- Documentation: EPIC
- Physician Daily Coverage: 24 hours
- APC Daily Coverage: 12 hours
- Full time \$300/hour

Florence , Oregon | Emergency Medicine | PeaceHealth

# Apply Now

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Title \*

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Board Certification \*

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Specialty \*

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How Did You Hear About Us? \*

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Phone Number \*

Your Phone Number

Current Citizenship Status \*

—Please choose an option—

States Licensed

List States

State of Interest

List States

Relocation \*

Are you willing to relocate?

- Yes  No

Current Residency Status \*

Are you currently in a medical residency program?

- Yes  No

Earliest Available Start Date \*

When are you available to start working?

mm/dd/yyyy

Email \*

Your Email Address

### Message to Recruiter

Write your message

### Upload Your CV \*

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Accepted file types: pdf, doc, docx, Max. file size: 256 MB.




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**Maya Brown**

 [mbrown@apollomd.com](mailto:mbrown@apollomd.com)

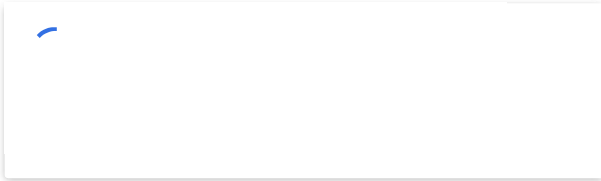
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# Florence, Oregon

Nestled on the Central Oregon Coast between the Siuslaw River and the Pacific Ocean, Florence offers breathtaking natural beauty right outside your doorstep — from pristine beaches and sand dunes to lush forests and riverfront trails. Outdoor enthusiasts can enjoy kayaking, fishing, hiking, golf, and sand dune adventures just minutes from town. Iconic landmarks like the Siuslaw River Bridge and nearby Heceta Head Lighthouse add historic charm to this coastal playground. With a tight-knit community of just over ~8,000 residents, Florence delivers friendly neighborhoods without the stress of big-city living.

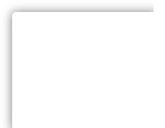




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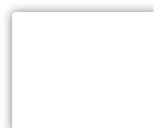
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# PeaceHealth Cottage Grove Community Medical Center – Emergency Medicine

PeaceHealth Cottage Grove Community Medical Center is part of the PeaceHealth system, an independent, nonprofit Catholic healthcare organization dedicated to compassionate, patient-centered care. The hospital promotes wellness across the lifespan while fostering a healing environment for mind, body,



and spirit. Open 24/7, the medical center serves as a vital healthcare resource for residents of southern Lane County and northern Douglas County, including surrounding rural communities such as Creswell, Lorane, Dexter, Dorena, Drain, Elkton, Oakland, and Yoncalla.

- Annual Volume: 15,000
- ED Beds: 7 (Licensed for 14 ED Beds)
- Daily Physician Hours: 24
- Daily APC Hours: 1
- Critical Access Hospital
- Full time \$290/hour

Cottage Grove , Oregon | Emergency Medicine |  
PeaceHealth

# Apply Now

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Title \*

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Board Certification \*

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Relocation \*

Are you willing to relocate?

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Current Residency Status \*

Are you currently in a medical residency program?

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Earliest Available Start Date \*

When are you available to start working?

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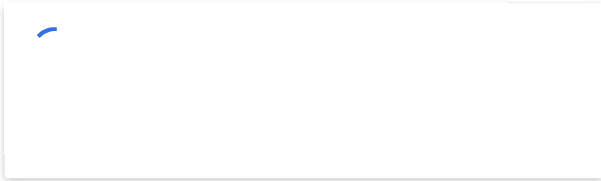
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# Cottage Grove, Oregon

Nestled in Oregon's southern Willamette Valley, Cottage Grove is a welcoming small city of about 10,500 residents known for its scenic beauty and strong sense of community. Its historic downtown features preserved early 20th-century architecture, colorful murals, and a lively Main Street filled with local cafés, boutiques, and diverse dining. Outdoor recreation is part of everyday life. The Row River Trail offers more than 16 miles of paved paths for biking and walking, while nearby Dorena Lake and Cottage Grove Lake provide easy access to boating, fishing, and camping. Located just 20 miles south of Eugene, Cottage Grove delivers a relaxed small-town lifestyle with convenient access to city amenities, culture, and entertainment — the best of both worlds.

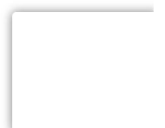




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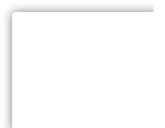
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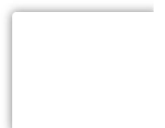
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252877296

**TYPE**

DOMESTIC LIMITED LIABILITY COMPANY

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LANE EMERGENCY PHYSICIANS LLC

**2. MAILING ADDRESS**

5665 NEW NORTHSIDE DR STE 320  
ATLANTA GA 30328 USA

**3. PRINCIPAL PLACE OF BUSINESS**

5665 NEW NORTHSIDE DR STE 320  
ATLANTA GA 30328 USA

**4. NAME & ADDRESS OF REGISTERED AGENT**

15872088 - CORPORATION SERVICE COMPANY  
  
1127 BROADWAY ST NE STE 310  
SALEM OR 97301 USA

**5. ORGANIZERS**

MELISSA ATKINS  
  
5665 NEW NORTHSIDE DR STE 320  
ATLANTA GA 30328 USA

**6. INDIVIDUALS WITH DIRECT KNOWLEDGE**

JOHNE PHILIP CHAPMAN  
  
5665 NEW NORTHSIDE DR STE 320  
ATLANTA GA 30328 USA

**7. DURATION**

PERPETUAL

**8. MANAGEMENT**

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**9. PROFESSIONAL SERVICES**

Physicians



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**ELECTRONIC SIGNATURE**

**NAME**

MELISSA ATKINS

**TITLE**

ORGANIZER

**DATE**

02-09-2026