

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION

CASE NO. 9:25-CV-80526-DMM

GOOD SAMARITAN MEDICAL
CENTER, INC., et al.,

Plaintiffs,

v.

THE LEAPFROG GROUP,

Defendant.

JOINT STIPULATION

Plaintiffs Good Samaritan Medical Center, Inc., Delray Medical Center, Inc., Palm Beach Gardens Community Hospital, Inc. d/b/a Palm Beach Gardens Medical Center, St. Mary's Medical Center, Inc., and West Boca Medical Center, Inc. (collectively, "the Plaintiff Hospitals") and Defendant The Leapfrog Group ("TLG") hereby stipulate and agree to the following:

WHEREAS, on April 30, 2025, the Plaintiff Hospitals filed their complaint in this matter, requesting "a jury trial on all issues so triable." ECF No. 1 ¶ 139 ("Complaint").

WHEREAS, on July 29, 2025, TLG filed its answer, similarly requesting "a jury trial on all issues so triable." ECF No. 43 at 62 ("Answer").

WHEREAS, on August 28, 2025, the Plaintiff Hospitals filed an amended complaint that, *inter alia*, removed their jury-trial demand and request for damages. ECF No. 74 ("Amended Complaint").

WHEREAS, on September 3, 2025, TLG filed an amended answer that, *inter alia*, removed its own jury-trial demand. ECF No. 75 ("Amended Answer").

WHEREAS, the parties agree that, absent a request for monetary damages, no jury trial right attaches in this case.

THE PARTIES HEREBY AGREE AS FOLLOWS: Pursuant to Federal Rule of Civil Procedure 39(a)(1), the parties jointly stipulate to a bench trial before the Honorable Donald M. Middlebrooks.

Dated: September 8, 2025

Respectfully submitted,

By: /s/ Kimberly E. Blair

Kimberly E. Blair

By: /s/ Brandon S. Floch

Brandon S. Floch

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