

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION**

Charles Ivy on behalf of himself
and all others similarly situated,

Plaintiff,

v.

Central Florida Regional Hospital, Inc.,
Transworld Systems, Inc.,

Defendants.

CLASS ACTION

CASE NO.

JURY TRIAL DEMANDED

6:17-CV-221-ORL
31-GJK

**PLAINTIFF’S CLASS ACTION COMPLAINT FOR VIOLATING THE TELEPHONE
CONSUMER PROTECTION ACT OF 1991 AND FOR OTHER RELIEF**

NOW COMES, the Plaintiff Charles Ivy (hereinafter “Plaintiff”), by and through the undersigned counsel and files this Class Action Complaint against Defendants Central Florida Regional Hospital, Inc. and Transworld Systems, Inc. respectfully showing the Court as follows:

INTRODUCTION

1.

Plaintiff brings this action to remedy Defendant’s unlawful business practices in violation of the Telephone Consumer Protection Act of 1991, 47 U.S.C. § 227 *et seq.* (hereinafter “TCPA”) by calling his cellular telephone numbers utilizing an automated telephone dialing system within the past 4 years

without his prior permission nor for emergency purposes. Plaintiff also seeks a judicial declaration that the payments applied to his account for services rendered covered the balance owed.

PARTIES AND SERVICE

2.

Plaintiff is a natural person and is the subject of the dispute complained about herein. Plaintiff is currently a resident of Volusia County, Florida.

3.

Defendant Central Florida Regional Hospital, Inc. (hereinafter “CFRH”) is a full-service, level II trauma center specializing in heart care and rehabilitation in the Orlando/Sanford area and is located at 1401 W Seminole Blvd, Sanford, FL 32771.

4.

Defendant CFRH may be served with the Summons and Complaint through its registered agent CT Corporation System located at 1201 Peachtree Street, NE, Atlanta, GA, 30361.

5.

Defendant Transworld Systems, Inc. (hereinafter “Transworld”) is a corporation organized and existing under the laws of the state of California and is

engaged in the business of debt collection throughout the United States including Volusia and Orange County, Florida.

6.

Defendant Transworld may be served with the Summons and Complaint through its registered agent CT Corporation System located at 1201 Peachtree Street, NE, Atlanta, GA, 30361.

SUBJECT MATTER JURISDICTION AND VENUE

7.

The court has jurisdiction to grant the relief sought by Plaintiff pursuant to 28 U.S.C. § 1331, because this is a civil action arising under the laws of the United States.

8.

Pursuant to 28 U.S.C. § 1391(b)(1) and (c)(2), venue is proper in this district because a substantial part of the events or omissions giving rise to the claims asserted herein occurred within this judicial district, i.e. Volusia and Orange county, Florida.

FACTUAL ALLEGATIONS

9.

Plaintiff has received over two hundred twenty (220) unsolicited debt collection calls from the Defendants on his cellular telephone number 386-315-

XXXX and 407-800-XXXX in the past 4 years measured from the date of the filing of this complaint.

10.

In or around August 2015 Defendant CFRH began contacting the Plaintiff on his cellular telephone numbers noted above and leaving automated voice mails, also known as robocalls, asking the Plaintiff to contact the hospital regarding his past due account.¹ These phone calls:

- a) invaded Plaintiff's privacy; and
- b) intruded upon Plaintiff's peace and solitude;
- c) caused Plaintiff to suffer annoyance, inconvenience, and aggravation;
- d) necessitated the hiring of legal counsel and incurring of fees and expenses.

11.

The automated voice mails left by CFRH have continued up to January 2017.

¹ A robocall is a phone call that uses a computerized autodialer to deliver a pre-recorded message, as if from a robot. If the call is answered then the person is transferred to a live agent.

12.

In or around August 2016 Plaintiff answered one of the telephone calls on his cellular telephone, after a brief pause he was then transferred to a live agent.

13.

Next, Plaintiff listened to the agent state the call was from Defendant Transworld and the reason for the call was for \$150 (approximately) debt owed on a medical bill for a visit to the emergency room at CFRH on May 30th, 2015.

14.

Plaintiff stated he was not paying the purported balance owed because the hospital had already received approximately \$12,000 for one short (6 hour) visit to the hospital to treat kidney stones and to stop calling his cellular telephone numbers.

15.

Both Defendants nonetheless continued to call Plaintiff's cellular telephone numbers in an attempt to collect the debt. Said calls:

- a) invaded Plaintiff's privacy; and
 - b) intruded upon Plaintiff's peace and solitude;
 - c) caused Plaintiff to suffer annoyance, inconvenience, and aggravation;
- and

d) necessitated the hiring of legal counsel and incurring of fees and expenses.

16.

Plaintiff never supplied his cellular telephone numbers to the original hospital/creditor CFRH because he was incapacitated at the time of admission and did not release either cellular telephone number to CFRH at any time during his stay for treatment.

17.

Plaintiff never gave consent pursuant to the TCPA to be contacted on his cellular telephone numbers to CFRH.

18.

Plaintiff never gave consent pursuant to the TCPA to be contacted on his cellular telephone numbers to Transworld.

19.

Approximately 30 calls in violation of the TCPA originated from Defendant CFRH according to Plaintiff's caller ID.

20.

Approximately 190 calls in violation of the TCPA originated from Defendant Transworld according to Plaintiff's caller ID.

21.

Before the calls were made, Defendants were aware of the prohibitions on making such a call pursuant to the Telephone Consumer Protection Act.

22.

Nevertheless, Defendants chose to suffer the consequences should the unlawful conduct alleged herein be uncovered due to the fact it is more profitable to not comply with the TCPA because robocalling is an extremely effective tool in the debt collection industry.

23.

The last call to Plaintiff's cellular telephone prior to the filing of this complaint initiated by both Defendants occurred in January, 2017.

24.

Plaintiff was charged for all the telephone calls alleged *supra*.

25.

All the telephone calls alleged *supra* were to Plaintiff's cellular telephone numbers identified above using an automatic telephone dialing system and were made without his prior express consent nor for emergency purposes.

CLASS ACTION ALLEGATIONS

26.

The named Plaintiff and others similarly situated to him, repeat and reallege the allegations in the preceding paragraphs of this Complaint, and incorporate the same herein by reference as though set forth herein in full.

27.

Plaintiff brings this claim on behalf of a proposed class, consisting of:

All persons from February 6th, 2013 through the date of the Court granting class certification, that were admitted to CFRH and that were then called by Defendant CFRH or Transworld using an automated telephone dialing system without the recipients' prior consent and the calls were not made for emergency purposes.

28.

Plaintiff and all others similarly situated respectfully request the Court enter an injunction Ordering Defendants, consistent with industry standards, to comply with the TCPA and all its regulations.

29.

Excluded from the Class are the Defendants and any entities in which Defendants or their subsidiaries or affiliates have a controlling interest, Defendant's officers, agents and employees, the judicial officer to whom this action is assigned and any member of the Court's staff and immediate families, as well as claims for personal injury, wrongful death, and emotional distress.

30.

Plaintiff seeks class action certification and is authorized to maintain this lawsuit as a class action pursuant to the Federal Rules of Civil Procedure 23(b)(1); 23(b)(2) and 23(b)(3).

31.

The persons included in each Class set out above are so numerous that joinder of all parties is impractical. Upon information and belief, there are more than one thousand (1,000) members of the proposed class. More precise information concerning the size and identification of class members will be obtained through discovery and set forth in Plaintiffs subsequent Motion for Class Certification.

32.

The statutory penalty for each violation is set by law at between \$500 - \$1,500 per violation per class member. Thus, the claim of each potential class member is relatively small, such that it is not economically feasible to bring individual actions for each member of the class.

33.

The claims of the class representative are typical of the claims of the proposed class. Plaintiff and each of the class members were called by Defendants using an automatic telephone dialing system on their cellular telephone number

without having consented to such action and was not made for emergency purposes.

34.

The questions of law and fact which are common among members of the class. The common issues include:

- (a) whether the unsolicited calls to wrong party class members cellular telephone using an automatic telephone dialing system violated the TCPA;
- (b) whether Defendants acted willfully and award treble damages.

35.

The questions of law or fact common to the members of the class predominate over any questions affecting only individual members and a class action is superior to any other method of fair adjudication of the class presented.

36.

The prosecution of separate actions by individual members of the class would create a risk of inconsistent or varying adjudications with respect to individual members which would establish incompatible standards of conduct for the party opposing the class.

37.

The representative party and their counsel will take those actions necessary to protect the interests of the class members.

38.

Plaintiff has retained counsel with experience in prosecuting complex litigation and consumer protection statutes.

39.

The basis for class certification under Rule 23(b)(1)(A) is that the prosecution of separate actions by individual members of the class would create a risk of inconsistent or varying adjudications with respect to individual members of the class which would establish incompatible standards of conduct for the Defendants.

40.

The basis for class certification under Rule 23(b)(1)(B) is that adjudication with respect to individual members of the class would be, as a practical matter, dispositive of the interests of the other members not parties to the adjudications.

COUNT I
VIOLATION OF 47 U.S.C. § 227(b)(1)(A) (iii) (TCPA)

41.

On at least two hundred twenty (220) separate occasions within the past four (4) years, Defendants willfully and knowingly violated the TCPA by using an

automatic telephone dialing system to contact the Plaintiff on his cellular telephone numbers without his prior express consent and that was not made for emergence purposes.

42.

The Telephone Consumer Protection Act provides for actual damages or \$500.00, whichever is greater pursuant to 47 USC 227b(3)(B) and for treble damages for a willful or knowing violation pursuant to 47 USC 227b(3).

43.

As a result of Defendants' violations of the TCPA, Plaintiff is entitled to damages in the amount of \$500 per violation or \$1,500 for each knowing or willful violation.

44.

As a result of Defendants' violations of the TCPA, Plaintiff is entitled to attorneys' fees and costs.

COUNT II
DECLARATORY JUDGMENT

45.

This claim is an action for Declaratory Judgment brought pursuant to the provisions of 28 U.S.C. § 2201 et seq.

46.

An actual controversy exists between the parties in this case in regard to the

telephone calls alleged *supra*.

47.

Plaintiff seeks a judicial declaration that the payments made on his account were sufficient to cover the balance owed to CFRH for the emergency room visit.

48.

Plaintiff and putative class members seek a judicial declaration as to whether calls made by the Defendant violated the TCPA.

DEMAND FOR TRIAL BY JURY

49.

Plaintiff and the putative class members request a trial by jury on all of their claims so triable.

WHEREFORE, Plaintiff request that the Court enter judgment in favor of Plaintiff and putative class members and against Defendant for:

- a. As to Count I award the sum of \$1,500 for the Plaintiff for each knowing or willful violation or in the alternative the sum of \$500 for each violation of the TCPA;
- b. As to Count II a declaration the purported medical debt had been timely paid and the Defendant violated the TCPA with respect to the Plaintiff and putative class members;

- c. Certify a nationwide class and award the sum of \$1,500 for the Plaintiff and each member of the class for each knowing or willful violation or in the alternative the sum of \$500 for each violation of the TCPA;
- d. Issue ssue an injunction Ordering defendants to comply with the TCPA and its regulations;
- e. Litigation expenses and costs of suit; and
- f. Such other and further relief as the Court deems just and proper.

Respectfully submitted this 8th day of February, 2017.

/s/ Harlan S. Miller

Harlan S. Miller

Georgia Bar No. 506709

Application for Pro Hac Admission Pending

Miller Legal, P.C.

3646 Vineville Ave.

Macon, GA, 31204

(404) 931-6490

(478) 292-7808 (FAX)

hmler@millerlegalpc.com

Pro Hac Vice Admission pendin

/s/ Kenneth D'Apice

Florida Bar No. 0104206

489 Palm Springs Drive, Suite100

Altamonte Springs, Florida, 32701

(407) 434-1208

Kdapice.law@gmail.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 8th, 2017, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record or pro se parties identified on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

JS44 (Rev. 11/16 NDGA)

CIVIL COVER SHEET

The JS44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form is required for the use of the Clerk of Court for the purpose of initiating the civil docket record. (SEE INSTRUCTIONS ATTACHED)

I. (a) PLAINTIFF(S).

Charles Ivy on behalf of himself
and all others similarly situated,

DEFENDANT(S)

Central Florida Regional Hospital, Inc &
Transworld Systems, Inc.

(b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF

Volusia
(EXCEPT IN U.S. PLAINTIFF CASES)

COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT

Volusia
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED

(c) ATTORNEYS

(FIRM NAME, ADDRESS, TELEPHONE NUMBER, AND E-MAIL ADDRESS)

Harlan S. Miller
Miller Legal, P.C.
3646 Vineville Ave.
Macon, GA, 31204
(404) 931-6490

ATTORNEYS (IF KNOWN)**II. BASIS OF JURISDICTION**

(PLACE AN "X" IN ONE BOX ONLY)

- ☐ 1 U.S. GOVERNMENT PLAINTIFF
☐ 2 U.S. GOVERNMENT DEFENDANT
☒ 3 FEDERAL QUESTION (U.S. GOVERNMENT NOT A PARTY)
☒ 4 DIVERSITY (INDICATE CITIZENSHIP OF PARTIES IN ITEM III)

III. CITIZENSHIP OF PRINCIPAL PARTIES

(PLACE AN "X" IN ONE BOX FOR PLAINTIFF AND ONE BOX FOR DEFENDANT)
(FOR DIVERSITY CASES ONLY)

- | PLF | DEF | PLF | DEF |
|---------------------------------------|---------------------------------------|----------------------------|---|
| <input checked="" type="checkbox"/> 1 | <input type="checkbox"/> 1 | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| | | | INCORPORATED OR PRINCIPAL PLACE OF BUSINESS IN THIS STATE |
| <input type="checkbox"/> 2 | <input checked="" type="checkbox"/> 2 | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| | | | INCORPORATED AND PRINCIPAL PLACE OF BUSINESS IN ANOTHER STATE |
| <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |
| | | | FOREIGN NATION |

IV. ORIGIN

(PLACE AN "X" IN ONE BOX ONLY)

- ☒ 1 ORIGINAL PROCEEDING
☐ 2 REMOVED FROM STATE COURT
☐ 3 REMANDED FROM APPELLATE COURT
☐ 4 REINSTATED OR REOPENED
☐ 5 TRANSFERRED FROM ANOTHER DISTRICT (Specify District)
☐ 6 MULTIDISTRICT LITIGATION - TRANSFER
☐ 7 APPEAL TO DISTRICT JUDGE FROM MAGISTRATE JUDGE JUDGMENT
☐ 8 MULTIDISTRICT LITIGATION - DIRECT FILE

V. CAUSE OF ACTION

(CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE A BRIEF STATEMENT OF CAUSE - DO NOT CITE JURISDICTIONAL STATUTES UNLESS DIVERSITY)

VIOLATION OF THE TCPA of 1991 - 47 U.S.C. § 227(b)(1)(A) (iii)

(IF COMPLEX, CHECK REASON BELOW)

- | | |
|---|---|
| <input type="checkbox"/> 1. Unusually large number of parties. | <input type="checkbox"/> 6. Problems locating or preserving evidence |
| <input type="checkbox"/> 2. Unusually large number of claims or defenses. | <input type="checkbox"/> 7. Pending parallel investigations or actions by government. |
| <input type="checkbox"/> 3. Factual issues are exceptionally complex | <input type="checkbox"/> 8. Multiple use of experts. |
| <input type="checkbox"/> 4. Greater than normal volume of evidence. | <input type="checkbox"/> 9. Need for discovery outside United States boundaries. |
| <input type="checkbox"/> 5. Extended discovery period is needed. | <input type="checkbox"/> 10. Existence of highly technical issues and proof. |

CONTINUED ON REVERSE

VI. NATURE OF SUIT (PLACE AN "X" IN ONE BOX ONLY)**CONTRACT - "0" MONTHS DISCOVERY TRACK**

- ☐ 150 RECOVERY OF OVERPAYMENT & ENFORCEMENT OF JUDGMENT
- ☐ 152 RECOVERY OF DEFAULTED STUDENT LOANS (Excl. Veterans)
- ☐ 153 RECOVERY OF OVERPAYMENT OF VETERAN'S BENEFITS

CONTRACT - "4" MONTHS DISCOVERY TRACK

- ☐ 110 INSURANCE
- ☐ 120 MARINE
- ☐ 130 MILLER ACT
- ☐ 140 NEGOTIABLE INSTRUMENT
- ☐ 151 MEDICARE ACT
- ☐ 160 STOCKHOLDERS' SUITS
- ☐ 190 OTHER CONTRACT
- ☐ 195 CONTRACT PRODUCT LIABILITY
- ☐ 196 FRANCHISE

REAL PROPERTY - "4" MONTHS DISCOVERY TRACK

- ☐ 210 LAND CONDEMNATION
- ☐ 220 FORECLOSURE
- ☐ 230 RENT LEASE & EJECTMENT
- ☐ 240 TORTS TO LAND
- ☐ 245 TORT PRODUCT LIABILITY
- ☐ 290 ALL OTHER REAL PROPERTY

TORTS - PERSONAL INJURY - "4" MONTHS DISCOVERY TRACK

- ☐ 310 AIRPLANE
- ☐ 315 AIRPLANE PRODUCT LIABILITY
- ☐ 320 ASSAULT, LIBEL & SLANDER
- ☐ 330 FEDERAL EMPLOYERS' LIABILITY
- ☐ 340 MARINE
- ☐ 345 MARINE PRODUCT LIABILITY
- ☐ 350 MOTOR VEHICLE
- ☐ 355 MOTOR VEHICLE PRODUCT LIABILITY
- ☐ 360 OTHER PERSONAL INJURY
- ☐ 362 PERSONAL INJURY - MEDICAL MALPRACTICE
- ☐ 365 PERSONAL INJURY - PRODUCT LIABILITY
- ☐ 367 PERSONAL INJURY - HEALTH CARE/ PHARMACEUTICAL PRODUCT LIABILITY
- ☐ 368 ASBESTOS PERSONAL INJURY PRODUCT LIABILITY

TORTS - PERSONAL PROPERTY - "4" MONTHS DISCOVERY TRACK

- ☐ 370 OTHER FRAUD
- ☐ 371 TRUTH IN LENDING
- ☐ 380 OTHER PERSONAL PROPERTY DAMAGE
- ☐ 385 PROPERTY DAMAGE PRODUCT LIABILITY

BANKRUPTCY - "0" MONTHS DISCOVERY TRACK

- ☐ 422 APPEAL 28 USC 158
- ☐ 423 WITHDRAWAL 28 USC 157

CIVIL RIGHTS - "4" MONTHS DISCOVERY TRACK

- ☐ 440 OTHER CIVIL RIGHTS
- ☐ 441 VOTING
- ☐ 442 EMPLOYMENT
- ☐ 443 HOUSING/ ACCOMMODATIONS
- ☐ 445 AMERICANS with DISABILITIES - Employment
- ☐ 446 AMERICANS with DISABILITIES - Other
- ☐ 448 EDUCATION

IMMIGRATION - "0" MONTHS DISCOVERY TRACK

- ☐ 462 NATURALIZATION APPLICATION
- ☐ 465 OTHER IMMIGRATION ACTIONS

PRISONER PETITIONS - "0" MONTHS DISCOVERY TRACK

- ☐ 463 HABEAS CORPUS- Alien Detainees
- ☐ 510 MOTIONS TO VACATE SENTENCE
- ☐ 530 HABEAS CORPUS
- ☐ 535 HABEAS CORPUS DEATH PENALTY
- ☐ 540 MANDAMUS & OTHER
- ☐ 550 CIVIL RIGHTS - Filed Pro se
- ☐ 555 PRISON CONDITION(S) - Filed Pro se
- ☐ 560 CIVIL DETAINEE: CONDITIONS OF CONFINEMENT

PRISONER PETITIONS - "4" MONTHS DISCOVERY TRACK

- ☐ 550 CIVIL RIGHTS - Filed by Counsel
- ☐ 555 PRISON CONDITION(S) - Filed by Counsel

FORFEITURE/PENALTY - "4" MONTHS DISCOVERY TRACK

- ☐ 625 DRUG RELATED SEIZURE OF PROPERTY
- ☐ 21 USC 881
- ☐ 690 OTHER

LABOR - "4" MONTHS DISCOVERY TRACK

- ☐ 710 FAIR LABOR STANDARDS ACT
- ☐ 720 LABOR/MGMT. RELATIONS
- ☐ 740 RAILWAY LABOR ACT
- ☐ 751 FAMILY and MEDICAL LEAVE ACT
- ☐ 790 OTHER LABOR LITIGATION
- ☐ 791 EMPL. RET. INC. SECURITY ACT

PROPERTY RIGHTS - "4" MONTHS DISCOVERY TRACK

- ☐ 820 COPYRIGHTS
- ☐ 840 TRADEMARK

PROPERTY RIGHTS - "8" MONTHS DISCOVERY TRACK

- ☐ 830 PATENT

SOCIAL SECURITY - "0" MONTHS DISCOVERY TRACK

- ☐ 861 HIA (1395f)
- ☐ 862 BLACK LUNG (923)
- ☐ 863 DIWC (405(g))
- ☐ 863 DIWW (405(g))
- ☐ 864 SSD TITLE XVI
- ☐ 865 RSI (405(g))

FEDERAL TAX SUITS - "4" MONTHS DISCOVERY TRACK

- ☐ 870 TAXES (U.S. Plaintiff or Defendant)
- ☐ 871 IRS - THIRD PARTY 26 USC 7609

OTHER STATUTES - "4" MONTHS DISCOVERY TRACK

- ☐ 375 FALSE CLAIMS ACT
- ☐ 376 Qui Tam 31 USC 3729(a)
- ☐ 400 STATE REAPPORTIONMENT
- ☐ 430 BANKS AND BANKING
- ☐ 450 COMMERCE/CC RATES/ETC.
- ☐ 460 DEPORTATION
- ☐ 470 RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS
- ☐ 480 CONSUMER CREDIT
- ☐ 490 CABLE/SATELLITE TV
- ☒ 890 OTHER STATUTORY ACTIONS
- ☐ 891 AGRICULTURAL ACTS
- ☐ 893 ENVIRONMENTAL MATTERS
- ☐ 895 FREEDOM OF INFORMATION ACT
- ☐ 899 ADMINISTRATIVE PROCEDURES ACT / REVIEW OR APPEAL OF AGENCY DECISION
- ☐ 950 CONSTITUTIONALITY OF STATE STATUTES

OTHER STATUTES - "8" MONTHS DISCOVERY TRACK

- ☐ 410 ANTITRUST
- ☐ 850 SECURITIES / COMMODITIES / EXCHANGE

OTHER STATUTES - "0" MONTHS DISCOVERY TRACK

- ☐ 896 ARBITRATION
(Confirm / Vacate / Order / Modify)

*** PLEASE NOTE DISCOVERY TRACK FOR EACH CASE TYPE. SEE LOCAL RULE 26.3**

VII. REQUESTED IN COMPLAINT:

☒ CHECK IF CLASS ACTION UNDER F.R.Cv.P. 23 DEMAND \$ _____

JURY DEMAND ☒ YES ☐ NO (CHECK YES ONLY IF DEMANDED IN COMPLAINT)

VIII. RELATED/REFILED CASE(S) IF ANY JUDGE _____

DOCKET NO. _____

CIVIL CASES ARE DEEMED RELATED IF THE PENDING CASE INVOLVES: (CHECK APPROPRIATE BOX)

- ☐ 1. PROPERTY INCLUDED IN AN EARLIER NUMBERED PENDING SUIT.
- ☐ 2. SAME ISSUE OF FACT OR ARISES OUT OF THE SAME EVENT OR TRANSACTION INCLUDED IN AN EARLIER NUMBERED PENDING SUIT.
- ☐ 3. VALIDITY OR INFRINGEMENT OF THE SAME PATENT, COPYRIGHT OR TRADEMARK INCLUDED IN AN EARLIER NUMBERED PENDING SUIT.
- ☐ 4. APPEALS ARISING OUT OF THE SAME BANKRUPTCY CASE AND ANY CASE RELATED THERETO WHICH HAVE BEEN DECIDED BY THE SAME BANKRUPTCY JUDGE.
- ☐ 5. REPETITIVE CASES FILED BY PRO SE LITIGANTS.
- ☐ 6. COMPANION OR RELATED CASE TO CASE(S) BEING SIMULTANEOUSLY FILED (INCLUDE ABBREVIATED STYLE OF OTHER CASE(S)):

☐ 7. EITHER SAME OR ALL OF THE PARTIES AND ISSUES IN THIS CASE WERE PREVIOUSLY INVOLVED IN CASE NO. _____, WHICH WAS DISMISSED. This case ☐ IS ☐ IS NOT (check one box) SUBSTANTIALLY THE SAME CASE.

SIGNATURE OF ATTORNEY OF RECORD

DATE

2/7/2017

ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Central Florida Regional Hospital, Transworld Systems Hit with TCPA Suit](#)
