

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

MELANIE MOCK, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

ST. DAVID’S HEALTHCARE
PARTNERSHIP, L.P., LLP,

Defendant.

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CIVIL ACTION NO. 1:19-cv-00611

NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1332, 1441, 1446, and 1453, St. David’s Healthcare Partnership, L.P., LLP (“St. David’s”) hereby removes to this Court the action styled “*Melanie Mock, Individually and on Behalf of All Others Similarly Situated v. St. David’s Healthcare Partnership, L.P., LLP,*” Cause No. D-1-GN-19-002790, in the 419th District Court of Travis County, Texas. St. David’s removes this case under the Class Action Fairness Act of 2005 (“CAFA”).

I. The State Court Action

1. On May 21, 2019, Melanie Mock (“Plaintiff”) filed Plaintiff’s Original Class Action Petition in Cause No. D-1-GN-19-002790, in the 419th District Court of Travis County, Texas (the “State Court Action”). St. David’s registered agent was served with process on May 22, 2019, via process server.

2. Pursuant to 28 U.S.C. § 1446(a), copies of the following documents are attached to this Notice of Removal:

- (a) Plaintiff's Original Class Action Petition,¹ **Exhibit 1**; and
- (b) Citation and related service documents, **Exhibit 2**.

II. Original Subject Matter Jurisdiction

3. This Court has jurisdiction over this case under 28 U.S.C. §§ 1332(d) and 1453. Plaintiff asserts a class action consisting of more than 100 members in which (1) at least one member of the class is a citizen of a different state than St. David's, and (2) the amount in controversy exceeds \$5,000,000, exclusive of interest and costs. 28 U.S.C. § 1332(d)(2). Thus, the State Court Action may be removed to this Court under 28 U.S.C. § 1441(a).

A. Number of Putative Class Members

4. Plaintiff defines the putative class as “[a]ll individuals who, within the last four years, received treatment at a St. David's HeathCare hospital's emergency department located in the State of Texas, and who were charged an emergency department facility fee which was billed on top of the charges for the individual items of treatment and services provided.” Ex. 1, Petition at ¶ 6.1. Plaintiff alleges that “the Class consists of at least tens of thousands of persons.” *Id.* ¶ 6.3.

5. Although St. David's does not believe that Plaintiff has defined a proper class, there are over one million individuals in the putative class defined by Plaintiff. *See* Declaration of Daniel Huffine (“Huffine Decl.”) ¶ 4, attached as **Exhibit 3**.

B. Minimal Diversity of Citizenship

6. CAFA requires only minimal diversity—in other words, at least one plaintiff must be from a different state than at least one defendant. *See Preston v. Tenet Healthsystem Memorial Med. Ctr., Inc.*, 485 F.3d 793, 797 (5th Cir. 2007). Minimal diversity exists here if at

¹ Plaintiff attached a “Placeholder Motion for Class Certification” as an exhibit to Plaintiff's Original Class Action Petition. *See* Ex. 1, Petition at ¶ 8 and Exhibit 1.

least one member of the putative class is a citizen of a different state than St. David's. *See Berniard v. Down Chem. Co.*, 481 F. App'x 859, 860 (5th Cir. 2010) (per curiam) ("CAFA authorizes federal jurisdiction over class actions that allege (1) the class of plaintiffs would exceed 100 persons, (2) ***at least one member of the class is diverse in citizenship from at least one of the defendants***, and (3) the aggregate quantum of damages suffered by members of the plaintiff class exceeds \$5 million (exclusive of interest or costs).") (emphasis added) (citing 28 U.S.C. § 1332(d)(2) and (5)(B)).

1. Citizenship of Plaintiff's Putative Class

7. The citizenship of a natural person is determined by his or her domicile, which is established "by physical presence in a location coupled with an intent to remain there indefinitely." *In re Ran*, 607 F.3d 1017, 1022 (5th Cir. 2010); *Coury v. Prot*, 85 F.3d 244, 249 (5th Cir. 1996). "A person's domicile is the place of his true, fixed, and permanent home and principal establishment, and to which he has the intention of returning whenever he is absent therefrom." *Mas v. Perry*, 489 F.2d 1396, 1399 (5th Cir. 1974) (internal citation and quotations omitted). In determining domicile, the Court should consider the following factors: "the places where the litigant exercises civil and political rights, pays taxes, owns real and personal property, has driver's and other licenses, maintains bank accounts, belongs to clubs and churches, has places of business or employment, and maintains a home for his family." *Coury*, 85 F.3d at 251.

8. At least one member of the putative class defined by Plaintiff is a citizen of a state other than Texas. *See* Ex. 3, Huffine Decl. ¶¶ 5-6. St. David's has attached evidence demonstrating that at least three members of the putative class are residents of states other than Texas. *See id.* ¶ 6; *see also* Declaration of William M. Katz, Jr. ¶¶ 3-7 & Exs. A-C, attached as **Exhibit 4**.

2. Citizenship of St. David's

9. St. David's is a limited liability partnership. *See* Declaration of Denise Bradley ("Bradley Decl.") ¶ 3, attached as **Exhibit 5**. "For purposes of [section 1332(d)] and section 1453, an unincorporated association [*e.g.*, a limited liability partnership] shall be deemed to be a citizen of the State where it has its principal place of business and the State under whose laws it is organized." 28 U.S.C. § 1332(d)(10).

10. St. David's is organized under the laws of the State of Texas, and its principal place of business is Austin, Texas. *See* Ex. 5, Bradley Decl. ¶ 3. Therefore, under 28 U.S.C. § 1332(d)(10), St. David's is a Texas citizen. *See* 28 U.S.C. § 1332(d)(10).

11. Accordingly, as provided by 28 U.S.C. § 1332(d), minimal diversity exists between St. David's and at least one member of the putative class.

12. St. David's Texas citizenship does not defeat CAFA jurisdiction. *See* 28 U.S.C. § 1453(b) ("A class action may be removed . . . without regard to whether any defendant is a citizen of the State in which the action is brought.").

C. Amount in Controversy

13. The amount in controversy in this purported class action exceeds \$5,000,000, exclusive of interest and costs.

14. The Fifth Circuit has "required the removing defendant [to] prove by a preponderance of the evidence that the amount in controversy equals or exceeds the jurisdictional amount." *Perritt v. Westlake Vinyls Co.*, 562 F. App'x 228, 231 (5th Cir. 2014) (citation and internal quotation marks omitted). In sustaining its burden of proof, St. David's may either (1) "[a]dduce summary judgment evidence of the amount in controversy, or (2) demonstrate that, from the class plaintiffs' pleadings alone, it is 'facially apparent' that

CAFA's amount in controversy is met." *Id.* (citation and internal quotation marks omitted). "The amount in controversy may be established either from the viewpoint of the plaintiff or the viewpoint of the defendant, and regardless of the type of relief sought (e.g., damages, injunctive relief, or declaratory relief)." *Magnum Minerals, L.L.C. v. Homeland Ins. Co. of New York*, No. 2:13-cv-103-J, 2013 WL 4766707, at *3 (N.D. Tex. Sept. 5, 2013) (quoting *Raspberry v. Capitol Cnty. Mut. Fire Ins. Co.*, 609 F. Supp. 2d 594, 600–01 (E.D. Tex. 2009) (citations omitted)); see *Stephenson v. Standard Ins. Co.*, No. SA:12-cv-01081-DAE, 2013 WL 3146977, at *5 (W.D. Tex. June 18, 2013).

15. Although St. David's disputes Plaintiff's allegations and the propriety of certifying any putative class, if the Court were to certify the putative class proposed by Plaintiff, the amount in controversy will exceed \$5,000,000, exclusive of interest and costs. See Ex. 3, Huffine Decl. ¶ 7. Moreover, it is facially apparent from Plaintiff's Petition that the amount in controversy is satisfied here. Plaintiff alleges that the putative class "consists of at least *tens of thousands* of persons," which means that the putative class consists of at least 20,000 individuals. See Ex. 1, Petition ¶ 6.3 (emphasis added). Plaintiff further alleges that St. David's improperly charged each class member an emergency department facility fee that ranged between \$396 and \$3,975. *Id.* ¶ 5.5. Assuming that St. David's billed each of the 20,000 putative class members \$396, the low end of the range, the amount in controversy would be 20,000 x \$396, or \$7,920,000, which exceeds CAFA's \$5,000,000 threshold.

16. In sum, because St. David's has established that: (1) this action involves over 100 putative class members; (2) there is minimal diversity between St. David's and at least one putative class member; and (3) the amount in controversy exceeds \$5,000,000, exclusive of

interest and costs, this Court has jurisdiction over this case under 28 U.S.C. §§ 1332, 1441, 1446, and 1453.

III. Timeliness of Removal

17. As required by 28 U.S.C. § 1446(b), this Notice of Removal is timely because it is filed within thirty (30) days of St. David's receipt of the Petition on May 22, 2019.

IV. Other Procedural Requirements

18. St. David's files this Notice of Removal in the United States District Court for the Western District of Texas, Austin Division, which is the district and division within which the State Court Action was pending. *See* 28 U.S.C. §§ 1441(a), 124(d).

19. Plaintiff filed a Placeholder Motion for Class Certification as an exhibit to Plaintiff's Original Class Action Petition. There are no hearings currently set in the State Court Action.

20. Immediately following the filing of this Notice of Removal, written notice of the filing of this Notice of Removal will be served on Plaintiff's counsel, as required by 28 U.S.C. § 1446(d).

21. St. David's will promptly file a copy of this Notice of Removal with the Clerk of the 419th District Court of Travis County, Texas, where the State Court Action was pending, as required by 28 U.S.C. § 1446(d).

22. By removing this action to this Court, St. David's does not waive any defenses, objections, or motions under state or federal law.

V. Conclusion

For all of these reasons, St. David's hereby removes the State Court Action to the United States District Court for the Western District of Texas, Austin Division, in accordance with §§

1332, 1441, 1446, and 1453. St. David's respectfully requests that this Court assume jurisdiction over this action and that all further proceedings in the State Court Action be stayed.

Respectfully submitted,

THOMPSON & KNIGHT LLP

By: /s/ J. Patrick Bredehoft

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ATTORNEYS FOR DEFENDANT
ST. DAVID'S HEALTHCARE
PARTNERSHIP, L.P., LLP

CERTIFICATE OF SERVICE

I hereby certify that this document was filed electronically on the 13th day of June 2019, and that service was achieved through the court's electronic filing system, as provided by Local Rule CV-5(b)(1).

/s/ J. Patrick Bredehoft
J. Patrick Bredehoft

EXHIBIT 1

EXHIBIT 2

EXHIBIT 3

EXHIBIT 4

EXHIBIT A

EXHIBIT B

EXHIBIT C

EXHIBIT 5

EXHIBIT 1



**Service of Process
Transmittal**

05/22/2019

CT Log Number 535534600

TO: Kathy Gibson
HCA Inc.
1 Park Plz Bldg 1-2W
Nashville, TN 37203-6527

RE: Process Served in Texas

FOR: St. David's Healthcare Partnership L.P., LLP (Domestic State: TX)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: MELANIE MOCK, etc., Pltf. vs. ST. DAVIDS HEALTHCARE PARTNERSHIP, L.P., etc., Dft.

DOCUMENT(S) SERVED: Citation, Original Class Petition, Exhibit(s)

COURT/AGENCY: 419th Judicial District Court Travis County, TX
Case # D1GN19002790

NATURE OF ACTION: Plaintiff Demand Judgment against Defendant

ON WHOM PROCESS WAS SERVED: C T Corporation System, Dallas, TX

DATE AND HOUR OF SERVICE: By Process Server on 05/22/2019 at 15:56

JURISDICTION SERVED : Texas

APPEARANCE OR ANSWER DUE: By 10:00 A.M. on the Monday next following the expiration of 20 days after you were served this citation and petition

ATTORNEY(S) / SENDER(S): Daniel E. Blum
BLUMBERG BAGLEY PLLC
2304 Interstate 20 West, Suite 190
Arlington, TX 76017
817-277-1500

ACTION ITEMS: CT has retained the current log, Retain Date: 05/22/2019, Expected Purge Date: 06/01/2019

Image SOP

Email Notification, Kathy Gibson kathy.gibson@hcahealthcare.com

Email Notification, Ivana Shallcross ivana.shallcross@hcahealthcare.com

Email Notification, Rob Hendrix Robert.Hendrix@hcahealthcare.com

Email Notification, Neal Rigsby Neal.Rigsby@hcahealthcare.com

SIGNED: C T Corporation System

ADDRESS: 1999 Bryan Street
Suite 900
Dallas, TX 75201

TELEPHONE: 214-932-3601

CITATION
THE STATE OF TEXAS
CAUSE NO. D-1-GN-19-002790

MELANIE MOCK, ON BEHALF OF HERSELF AND ALL OTHERS SIMILARLY SITUATED

, Plaintiff

vs.

ST. DAVID'S HEALTHCARE PARTNERSHIP, L.P., LLP, A TEXAS LIMITED LIABILITY PARTNERSHIP

, Defendant

TO: ST DAVIDS HEALTHCARE PARTNERSHIP LP LLP
d/b/a St. David's South Austin Medical Center
d/b/a St. David's HealthCare
BY SERVING ITS REGISTERED AGENT CT CORPORATION
1999 BRYAN STREET SUITE 900
DALLAS, TEXAS 75201-3136

Defendant, in the above styled and numbered cause:

YOU HAVE BEEN SUED. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 A.M. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you.

Attached is a copy of the PLAINTIFF'S ORIGINAL CLASS ACTION PETITION of the PLAINTIFF in the above styled and numbered cause, which was filed on MAY 21, 2019 in the 419TH JUDICIAL DISTRICT COURT of Travis County, Austin, Texas.

ISSUED AND GIVEN UNDER MY HAND AND SEAL of said Court at office, May 22, 2019.

REQUESTED BY:
DANIEL E. BLUMBERG
2304 W INTERSTATE 20 STE 190
ARLINGTON, TX 76017-1672
BUSINESS PHONE: (817) 277-1500 FAX: (817) 277-1170



Velva L. Price
Travis County District Clerk
Travis County Courthouse
1000 Guadalupe, P.O. Box 679003 (78767)
Austin, TX 78701

PREPARED BY: VICTORIA BENAVIDES

RETURN
Came to hand on the ___ day of ___, ___ at ___ o'clock ___ M., and
executed at ___ within the County of
___ on the ___ day of ___, ___, at ___ o'clock ___ M.,
by delivering to the within named ___, each
in person, a true copy of this citation together with the PLAINTIFF'S ORIGINAL CLASS ACTION
PETITION accompanying pleading, having first attached such copy of such citation to such copy of
pleading and endorsed on such copy of citation the date of delivery.

Service Fee: \$ _____

Sworn to and subscribed before me this the

___ day of ___, _____.

Notary Public, THE STATE OF TEXAS

Table with 3 columns: Date, Time, Server-Initials. Includes a row with handwritten date 5-22-19, time 9:20 AM, and initials JC. Also includes a row for Printed Name of Server and a row for County, Texas.

D-1-GN-19-002790

SERVICE FEE NOT PAID

P01 - 000078088

Original

Service Copy

5/21/2019 12:20 PM

Velva L. Price
District Clerk
Travis County
D-1-GN-19-002790
Victoria Benavides

D-1-GN-19-002790

CAUSE NO. _____

**MELANIE MOCK, on behalf of herself
and all others similarly situated,
Plaintiff,**

vs.

**ST. DAVID’S HEALTHCARE
PARTNERSHIP, L.P., LLP, a Texas
Limited Liability Partnership,
Defendant.**

§ IN THE DISTRICT COURT OF
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§ TRAVIS COUNTY, TEXAS
§
§
§ 419TH JUDICIAL DISTRICT
§

PLAINTIFF’S ORIGINAL CLASS ACTION PETITION

I. INTRODUCTION

1.1 Plaintiff Melanie Mock (“Plaintiff”), on behalf of herself and all others similarly situated, files this Class Action Petition against Defendant St. David’s Healthcare Partnership, L.P., LLP (“Defendant”), challenging Defendant’s unfair, false, misleading and deceptive practice of charging its emergency care patients a substantial but undisclosed emergency room facility fee (hereinafter, “Surcharge”) on top of the charges for the individual items of treatment and services provided. Although knowledge of this Surcharge, which is essentially a “cover charge” or “surcharge” for being seen at Defendant’s emergency room facilities, would be a substantial factor in a patient’s decision to seek emergency care from Defendant, it is effectively hidden from Defendant’s emergency room patients.

1.2 Using the brand name “St. David’s HealthCare,” Defendant operates approximately seven hospitals with emergency departments in the State of Texas. Plaintiff files this petition on behalf of patients of Defendant who received treatment at any of these hospital emergency departments and who were billed a Surcharge. By this petition, Plaintiff seeks declaratory and injunctive relief on the basis that these undisclosed Surcharges were unauthorized by contract and unconscionable.

II. DISCOVERY CONTROL PLAN LEVEL

2. Plaintiff intends that discovery be conducted under Level 3.

III. PARTIES

3.1 Plaintiff Melanie Mock, a Texas citizen and resident of Travis County, was admitted to, treated at, and released from St. David's South Austin Medical Center, one of Defendant's hospitals, which is located in Travis County, Texas.

3.2 Defendant St. David's Healthcare Partnership, L.P., LLP, is a Texas Limited Liability Partnership with its principal place of business in Austin, Travis County, Texas, that does business as "St. David's HealthCare" and as "St. David's South Austin Medical Center." Plaintiff is informed, believes and alleges that Defendant owns, operates and/or provides management and billing services to all the St. David's HealthCare Hospitals, including South Austin Medical Center. "St. David's South Austin Medical Center" is named as a defendant herein pursuant to the provisions of TEX. R. CIV. P. 28. Plaintiff specifically invokes her right to institute suit against whatever entity was conducting business using the assumed or common name of "St. David's South Austin Medical Center" and/or "St. David's HealthCare" with regard to the events hereinafter described. Plaintiff specifically invokes her right under TEX. R. CIV. P. 28 to have the true name of this party substituted at a later time if necessary. **Defendant St. David's Healthcare Partnership, L.P., LLP, may be served with process by serving its registered agent, CT Corporation System, at its registered address, 1999 Bryan Street, Suite 900, Dallas, Dallas County, Texas 75201.**

IV. JURISDICTION AND VENUE

4.1 The amount in controversy exceeds this Court's minimum jurisdictional requirements.

4.2 This Court has personal jurisdiction over Defendant because Defendant is a Texas Limited Liability Partnership; because Defendant's principal place of business is in Texas; because Defendant does business in Texas; because Defendant is registered to do business in Texas; because Defendant maintains an office, place of business or agency for transacting business in Texas; because Defendant contracted in Texas with Texas residents; and/or because Defendant's performance of the subject contracts, in whole or in part, occurred or is to occur in Texas.

4.3 Venue of this matter is proper in Travis County because Defendant's principal office in this State is in Travis County, because the contracts were to be performed in whole or in part in Travis County, and/or because a substantial part of the events or omissions giving rise to the claims pleaded herein occurred in Travis County.

4.4 Two-thirds or more of the members of the proposed plaintiff class, and the only defendants, are citizens of Texas. Accordingly, there is no basis for federal court jurisdiction. *See* 28 U.S.C.A. § 1332(d)(4)(B).

V. FACTS

A. AGENCY ALLEGATIONS

5.1 Plaintiff is informed, believes and alleges that Defendant St. David's Healthcare Partnership, L.P., LLP, exercises control over its constituent hospitals by developing and controlling their internal policies relating to pricing, billing, and collection practices.

5.2 Plaintiff is informed, believes and alleges that at Defendant's direction and with its approval, each of the St. David's HealthCare Hospitals represents itself as being part of the St. David's healthcare system.

5.3 At all relevant times each and every individual St. David's HealthCare Hospital included in this action was and is the agent of Defendant. In committing the acts alleged herein each and every St. David's HealthCare Hospital acted in the course and scope of its

agency and was acting with the consent, permission, authorization, satisfaction and knowledge of Defendant and perpetrated and/or aided and abetted the wrongdoings described herein. Plaintiff is informed, believes and alleges that all actions of each St. David's HealthCare Hospital were ratified and approved by Defendant or its officers, directors, controlling persons, agents, partners or joint venturers.

B. GENERAL ALLEGATIONS

5.4 Plaintiff is informed, believes and alleges that at all relevant times all St. David's HealthCare Hospitals used a substantially similar form contract (hereinafter "Contract") drafted by Defendant, the terms of which are not dictated by statute or otherwise, which all emergency care patients (or their agents) were presented with and requested to sign, and which contained a financial responsibility provision under which the patient (or his/her agent) promised to pay the hospital for the treatment and services being provided. However, none of Defendant's emergency room Contracts disclosed or even mentioned the Surcharge that Defendant intended to charge and did charge to its emergency room patients in addition to the charges for the specific services provided. Further, neither the Surcharge nor Defendant's intention to add a Surcharge to an emergency patient's bill is disclosed on signage posted in or around Defendant's emergency rooms or disclosed verbally during the emergency room registration process.

5.5 Despite the lack of disclosure, at all relevant times Defendant has had a practice of charging emergency department patients (other than Medicare/Medicaid patients) a hidden and undisclosed Surcharge set at one of five levels, according to the seriousness and complexity of the patient's condition, with such level being based on a secret formula or algorithm known only to Defendant, and determined only after treatment is rendered. This Surcharge is imposed in addition to the itemized charges for the individual items of treatment or service provided to the patient. For example, for Defendant's South Austin Medical Center

the 2019 Surcharge amounts are as follows: Level 1: \$396; Level 2: \$719; Level 3: \$1,364; Level 4: \$2,800; and Level 5: \$3,975.

5.6 Plaintiff is informed, believes and based thereon alleges that all of Defendant's hospitals included in this action likewise charged a hidden and undisclosed Surcharge to their emergency department patients.

5.7 Plaintiff is informed and believes and based thereon alleges that this substantial Surcharge is not based on the individual items of treatment or services provided to the patient, such as X-rays, laboratory services, sterile supplies, drugs, etc. Rather, it is a Surcharge charged to emergency patients simply for presenting and being seen at any one of Defendant's hospital emergency departments, and such Surcharge is imposed on top of the charges for specific items of treatment/services. Further, the formula or algorithm which Defendant uses to determine the level of Surcharge (1, 2, 3, 4 or 5) is also hidden from patients, making it virtually impossible for patients to know or seek to control the level or amount of the Surcharge they will be charged for their visit. Further, it is not disclosed in Defendant's Contract and is not visibly posted on signage in or around Defendant's emergency departments, where a patient would at least have the opportunity of knowing of its existence, nor is it disclosed to patients verbally during the registration process. Thus, Plaintiff is informed, believes and alleges that Defendant failed to inform emergency care patients that they would be billed a substantial undisclosed and unmentioned Surcharge which is charged on top of the charges for individual items of treatment furnished to the patient, and which, if known to patients prior to treatment, would be a substantial factor in a patient's decision to remain at the hospital and proceed with treatment. The high cost of medical services is a matter of great public concern and emergency care patients have a right to be informed of a substantial Surcharge before it is incurred. Defendant's failure to disclose its Surcharges contributes to a lack of pricing transparency and a lack of informed consent by patients, who

are generally totally unaware of such Surcharges or how they are determined. Plaintiff is further informed, believes and alleges that many emergency care patients, if informed of Defendant's Surcharges prior to their being incurred, would choose to seek less costly treatment elsewhere.

5.8 Emergency patients have no reasonable opportunity to review or negotiate these Surcharges and they are not disclosed to patients in Defendant's Contracts or otherwise before Defendant's patients receive care. Accordingly, these patients cannot be deemed to have agreed to pay such Surcharges.

5.9 Despite being entitled to charge no more than the charges for services rendered, Defendant bills these additional Surcharges even though (a) these substantial Surcharges are not disclosed to patients in Defendant's Contracts, in signage posted in or around its emergency departments, or verbally to patients at the time of registration, (b) emergency care patients cannot reasonably be expected to be aware of these Surcharges, (c) Defendant is well aware that most emergency patients are unaware of its intention to add a Surcharge to their bill, and (d) knowledge of the existence and amounts of this Surcharges would be a substantial factor in influencing a reasonable patient's decision as to whether to remain and seek treatment at a St. David's HealthCare Hospital emergency department. The failure to disclose the Surcharges is particularly egregious in light of the fact that Defendant represents itself as a partnership with two non-profit foundations which reinvest the proceeds of operating Defendant's hospitals back into the local community. Unlike a normal arms-length transaction between a buyer and seller, a patient seeking medical services at one of Defendant's emergency departments places a great degree of trust and confidence on the good intentions of the hospital to treat him or her fairly and with compassion. This trust and reliance is heightened by Defendant's Values statement, in which Defendant represents its Values as "I.C.A.R.E.: Integrity; Compassion; Accountability; Respect; Excellence."

5.10 Defendant's failure to disclose its intention to bill Plaintiff and Class members a substantial emergency department Surcharge constitutes actionable consumer fraud or deceit because Defendant had exclusive knowledge that it would be billing Plaintiff and Class members such a Surcharge; this fact was not known or reasonably accessible to Plaintiff or Class members at the time of their emergency department visits; and/or Defendant actively concealed its intention to bill Plaintiff and Class members such a Surcharge by failing to mention it in its Contract, in signage posted in the emergency room facilities, or verbally during registration. A reasonable consumer would deem the fact that he or she would be billed a substantial Surcharge to be an important factor in determining whether or not to remain and obtain treatment at the hospital's emergency room facilities.

C. THE REPRESENTATIVE PLAINTIFF'S CLAIM

5.11 On or about October 27, 2018, Plaintiff Melanie Mock received emergency treatment/services at St. David's South Austin Medical Center, where she was provided with and signed Defendant's form Contract. While there, Plaintiff received no notice or warning, either in Defendant's Contract, in posted signage in the emergency department, or verbally at the time of registration, as to the substantial Surcharge that Defendant intended to add (and did add) to Plaintiff's bill on top of the individual charges for each item of treatment and services provided to her.

5.12 The gross amount (before discounts) subsequently billed for the treatment/services provided to Plaintiff by the hospital was \$13,288.00, which included a Surcharge of \$2,800.00. This Surcharge was hidden by Defendant's failure to disclose the Surcharge prior to treatment or on the summary billing statement sent to Plaintiff.

5.13 Plaintiff was shocked, dismayed and aggrieved after she obtained an itemized billing statement and found out that she had been charged a "LVL 4 EMER DEPT" Surcharge of \$2,800 in addition to all of the individual items of treatment and services as a result of

merely being seen in the Hospital's emergency department.

VI. CLASS ACTION ALLEGATIONS

6.1 Plaintiff brings this claim for declaratory relief pursuant to Texas Rules of Civil Procedure 42 and/or other applicable law on behalf of herself and a class of all other persons similarly situated, defined as follows:

All individuals who, within the last four years, received treatment at a St. David's HealthCare hospital's emergency department located in the State of Texas, and who were charged an emergency department facility fee which was billed on top of the charges for the individual items of treatment and services provided (the "Class").

Excluded from the Class are any officers or directors of Defendant, together with the legal representatives, heirs, successors, or assigns of Defendant, and any judicial officer assigned to this matter and his or her immediate family.

6.2 This action has been brought and may properly be maintained as a class action, satisfying the numerosity, commonality, predominance, typicality, adequacy of representation, and superiority requirements. Plaintiff seeks to represent an ascertainable Class with a well-defined community of interest in the questions of law and fact involved in this matter.

6.3 The members of the Class are so numerous that joinder of all members of the Class is impractical. Plaintiff is informed, believes and alleges that the Class consists of at least tens of thousands of persons.

6.4 This action involves the question of whether Defendant's uniform practice of failing to disclose and subsequently billing emergency care patients a substantial Surcharge is unfair, false, deceptive, and/or misleading. This question predominates over any individual issues that might exist.

6.5 The claims of Plaintiff are typical of the claims of the Class, and Plaintiff is a member of the Class as defined.

6.6 Plaintiff will fairly and adequately represent and protect the interests of the Class. Plaintiff shares the same interests as all Class members because Plaintiff's claims are

typical of those of other Class members. Plaintiff has retained competent class counsel who are experienced in class action litigation and who will fairly and adequately protect the interests of the Class members.

6.7 This action is properly maintained as a class action in 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 for the party opposing the class.

6.8 This action is properly maintained as a class action in that the prosecution of separate actions by or against individual members of the class would create a risk of adjudications with respect to individual members of the class which would as a practical matter be dispositive of the interests of the other members not parties to the adjudications or substantially impair or impede their ability to protect their interest.

6.9 This action is properly maintained as a class action in that Defendant has acted or refused to act on grounds generally applicable to all the members of the Class and has engaged in a systemwide policy of billing emergency care patients a substantial undisclosed Surcharge, thereby making final injunctive and corresponding declaratory relief concerning the Class as a whole appropriate.

6.10 There are questions of law and fact common to the Class including, but not limited to:

- (a) Whether Defendant had a policy and practice of using a single, adhesive, admissions agreement for incoming patients in each of its emergency departments;
- (b) Whether Defendant had a duty to disclose to its emergency patients its policy of imposing Surcharges on top of the charges for the specific items of treatment and services provided;

- (c) Whether Defendant had a policy and practice of failing to inform its emergency care patients of the existence and amounts of these Surcharges;
- (d) Whether Defendant had a policy and practice of concealing this information from its emergency care patients;
- (e) Whether Defendant had a policy and practice of concealing its formula or algorithm for determining the level of its Surcharge from its emergency care patients;
- (f) Whether Defendant knew that some patients would not have sought emergency services from Defendant had this information been disclosed;
- (g) Whether Defendant's Contract authorizes Defendant to bill Class members these Surcharges;
- (h) Whether Defendant's Contract contains a promise by patients to pay these Surcharges;
- (i) Whether Defendant's practice of billing undisclosed Surcharges to Class members is an unconscionable billing practice;
- (j) Whether Defendant properly disclosed its Surcharges in its Contracts or on signage posted at or around its emergency departments; and
- (k) Whether the acts and conduct of Defendant alleged herein render a declaration necessary and proper as to the rights of Defendant and the obligations of Plaintiff and the Class.

6.11 A class action is superior to other available methods for the fair and efficient adjudication of this litigation, since joinder of all Class members is impracticable and it would be virtually impossible for the Class members to efficiently redress their wrongs individually. Even if all Class members could afford such individual litigation themselves the court system would benefit from a class action. Individualized litigation would present the potential for

inconsistent or contradictory judgments, particularly because this action revolves around a “duty to disclose,” which is the same determination for every class member. Individualized litigation would also magnify the delay and expense to all parties and the court system presented by the issues of the case. By contrast, the class action device presents far fewer management difficulties and provides the benefit of comprehensive supervision by a single court, as well as economies of scale and expense.

6.12 The definition of the class is clear and the members of the class are easily identifiable based on objective information. Members of the class can be identified using information that is kept by Defendant in the usual course of business and/or in the control of Defendant. Class members can be notified of the class action through publication and direct mailings to address lists maintained in the usual of course of business by Defendant.

VII. FIRST CAUSE OF ACTION: SUIT FOR DECLARATORY JUDGMENT

7.1 Plaintiff herein repeats, reiterates and realleges each and every allegation contained in the preceding paragraphs with the same force and effect as though the same were set forth at length herein.

7.2 Pursuant to the Uniform Declaratory Judgments Act, Texas Civil Practice & Remedies Code § 37.001 *et seq.*, Plaintiff requests that this Court issue a declaratory judgment declaring:

- (a) that Defendant’s billing practices as they relate to Class members are unconscionable;
- (b) that the Contract does not authorize Defendant to charge undisclosed Surcharges; and
- (c) that Plaintiff and members of the Class are liable to Defendant, under the Contract, for no more than the charges for the individual items of treatment/services provided.

7.3 An actual controversy exists between Plaintiff and Defendant relating to their respective legal rights and duties. Plaintiff contends that Defendant has a duty to fully disclose its emergency room Surcharge and to disclose the basis on which the amount of that charge will be determined prior to rendering services that result in such Surcharge being incurred. Plaintiff further contends that under Defendant's Contract she is only required to pay the Hospital's charges for individual items of treatment/services rendered and not its undisclosed Surcharge. In contrast, Defendant asserts that its Contract entitles it to bill a Surcharge in addition to the individual items of treatment/services rendered and has billed Plaintiff a Surcharge. To resolve the ongoing disputes over Defendant's Surcharges, Plaintiff and members of the Class are entitled to a determination as to whether Defendant has a duty to disclose its Surcharge in advance of such Surcharge being incurred and are further entitled to a declaration and appropriate injunctive relief with regard to a patient's legal rights and duties with respect to Defendant's Surcharges and the construction of Defendant's Contract. Specifically, Plaintiff and members of the Class are entitled to a declaration that Defendant's practice of charging a substantial undisclosed Surcharge in addition to the charges for the specific services and treatments provided is not authorized by Defendant's Contract. Significantly, the Uniform Declaratory Judgments Act is remedial in nature and should be liberally construed. *See Texas Civil Practice & Remedies Code § 37.002(b).*

7.4 Plaintiff and members of the Class are entitled to a further declaration that Defendant owed Plaintiff and Class members a duty to disclose, in advance of providing treatment that would trigger a Surcharge, its intention to charge such a Surcharge because of (1) the substantial nature of Defendant's Surcharge, (2) the special relationship that exists between Defendant and emergency department patients, (3) the hidden nature of Defendant's Surcharge, (4) the general lack of knowledge of emergency department patients as to Defendant's intention to bill them such a Surcharge, (5) the lack of reasonable opportunity for

an emergency department patient to find out about such a Surcharge prior to incurring it, (6) the fact that Defendant is aware that many, if not most patients, are unaware of Defendant's intention to bill them a Surcharge, and (7) the fact that knowledge of such a Surcharge would be a material factor in a patient's decision regarding whether to remain at Defendant's emergency department in order to obtain treatment and services.

7.5 Plaintiff is also entitled to declaratory and injunctive relief to prohibit Defendant from continuing to bill emergency patients for Surcharges without full and fair disclosure in advance of treatment which will trigger such Surcharges, and to prohibit Defendant from pursuing existing collection activity based on such Surcharges.

7.6 The declarations sought above are necessary and appropriate, since Plaintiff and the Class have been impacted financially by Defendant's undisclosed Surcharges. By granting the declaratory relief sought by Plaintiff, this Court will clarify and resolve an ongoing and continuing dispute as to the rights and duties of the parties with regard to Defendant's billing practices. Even for those patients whose Surcharge has not yet been paid, they should not have to wait until collection efforts are under way before obtaining a legal determination of their obligations with respect to Defendant's Surcharges. Finally, the declarations sought herein would benefit future emergency care patients of Defendant, by bringing about increased pricing transparency and informed consent.

7.7 No monetary damages or restitution are sought in this petition. However, Plaintiff has incurred and is entitled to recover costs and reasonable and necessary attorney's fees in seeking this declaratory judgment.

VIII. MOTION FOR CLASS CERTIFICATION

8. Plaintiff is filing—and serving on Defendant with this petition—a motion for class certification and request for a scheduling order to govern discovery and briefing regarding class certification issues. The motion is attached hereto as Exhibit 1.

IX. COMPLAINT WITH TEX. R. CIV. P. 47

9. A short statement of Plaintiffs' causes of action sufficient to give fair notice of the claims involved appears above. As also noted above, the damages sought herein are within the jurisdictional limits of this court. Plaintiff and the Class seek declaratory relief; injunctive relief; an order certifying the Class, appointing the undersigned attorneys counsel for the Class, directing that reasonable notice of this action be given by Defendants to the members of the Class and awards of costs of suit (including reasonable attorneys' fees and expert fees); and such other relief as may be just and proper.

X. REQUESTS FOR DISCLOSURES

10. Pursuant to TEX. R. CIV. P. 194, Defendant is requested to disclose, within fifty (50) days of service of this Petition, the information and/or material described in TEX. R. CIV. P. 194.2(a)-(l).

PRAYER FOR RELIEF

WHEREFORE, Plaintiff, on her own behalf and on behalf of the Class, prays for the following relief against Defendant:

1. For an order certifying that this action may be maintained as a class action against Defendant, appointing Plaintiff and her counsel to represent the Class, and directing that reasonable notice of this action be given by Defendant to the members of the Class;
2. For a declaration or declarations as prayed for herein;
3. For injunctive relief to enforce the relief prayed for herein;
4. For an order awarding Plaintiff and members of the Class the costs of the suit including, but not limited to, reasonable attorneys' fees and expenses and expert fees; and
5. For such other and further relief as may be just and proper.

Respectfully submitted,

BLUMBERG BAGLEY PLLC

by: /s/ Daniel E. Blumberg

Daniel E. Blumberg

Texas Bar No. 02512985

daniel@blumbergbagley.com

Peter F. Bagley

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2304 Interstate 20 West, Suite 190

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(817) 277-1500

Facsimile (817) 277-1170

LAW OFFICE OF BARRY KRAMER

By: /s/ Barry L. Kramer

Barry L. Kramer

kramerlaw@aol.com

9550 S. Eastern Avenue, Suite 253

Las Vegas, NV 89123

(702) 778-6090

ATTORNEYS FOR PLAINTIFF

EXHIBIT

1

CAUSE NO. _____

MELANIE MOCK, on behalf of herself and all others similarly situated, Plaintiff,	§	IN THE DISTRICT COURT OF
	§	
vs.	§	
	§	TRAVIS COUNTY, TEXAS
ST. DAVID’S HEALTHCARE PARTNERSHIP, L.P., LLP, a Texas Limited Liability Partnership, Defendant.	§	
	§	
	§	_____ JUDICIAL DISTRICT

PLACEHOLDER MOTION FOR CLASS CERTIFICATION

Plaintiff Melanie Mock (hereinafter “Plaintiff”), by and through her undersigned counsel, hereby respectfully moves the Court for an order certifying this action as a class action in accordance with Tex. R. Civ. P. 42 on behalf of herself and a class of all other persons similarly situated, but respectfully requests that the Court continue the instant motion until a discovery schedule and briefing deadlines are established by the Court in connection with the parties’ submission of a proposed case management schedule.

I. THE REASON FOR THIS MOTION

This case is in its infancy and no discovery by either side has taken place as of this time. While Defendant has given no indication that it intends to attempt a so-called “buy off” or “pick off” in an effort to moot Plaintiff’s representative claims, Plaintiff submits this motion out of an abundance of caution and to remove any such attempt as a potential issue. See, e.g., *Damasco v. Clearwire Corp.*, 662 F.3d 891, 896 (7th Cir. 2011). (“Class Action Plaintiffs can move to certify the class at the same time that they file their complaint. The pendency of that motion protects a putative class from attempts to buy off the named plaintiffs. . . . If the parties have yet to fully develop the facts needed for certification, they then can ask the district court to delay its ruling to provide time for additional discovery or investigation.”) Plaintiff respectfully asks the

Court to continue its consideration of the merits of this motion until there has been an opportunity to complete discovery on class issues and to submit supplemental briefing in support of or in opposition to the motion.

II. JURISDICTION

Texas courts allow for class actions to seek classwide relief under the Uniform Declaratory Judgments Act, Tex. Civ. Prac. & Rem. Code § 37.001 et seq. Plaintiff's Original Class Action Petition easily satisfies Texas law's requisites for such class certification. Plaintiff's Original Class Action Petition alleges that through a common course of conduct Defendant and its affiliated hospitals bill and seek payment from emergency room patients of a hidden and undisclosed emergency department fee (hereinafter "Surcharge") which is improperly added to each patient's bill on top of the itemized charges for individual items of treatment and services provided to the patient. A justiciable controversy is presented herein as to (1) whether Defendant's Emergency Room admissions form (hereinafter "Contract") authorizes Defendant's affiliated hospitals to bill and requires emergency room patients to pay such Surcharges and (2) whether Defendant's billing of such Surcharges is unconscionable. Defendant has acted in a substantially similar manner with respect to each Class member such that final declaratory and injunctive relief is necessary and appropriate for the Class as a whole under the causes of action alleged in the Complaint.

III. THE PROPOSED CLASS

The proposed "Class" is defined in Plaintiff's operative pleading as follows:

All individuals who, within the last four years, received treatment at a St. David's Healthcare emergency department in Texas, and who were charged an emergency department facility fee which was billed on top of the charges for the

individual items of treatment and services provided (the “Class”).

Excluded from the Class are any officers or directors of Defendants, together with the legal representatives, heirs, successors, or assigns of Defendant, and any judicial officer assigned to this matter and his or her immediate family.

IV. NUMEROSITY, COMMONALITY, TYPICALITY AND ADEQUACY

Financial and usage figures reported for Saint David’s South Austin Medical Center to governmental authorities reflect that for the most recently reported single year the hospital maintains 252 General Med/Surg Beds with a Total Patient Revenue of \$2,284,456,492. The reported figures further reflect hospital estimates of 29,500 Emergency Room visits during which the patient was seen in the emergency room and 17,200 emergency room visits during which the patient was seen in the emergency room and admitted to the hospital. These figures represent numbers for only one of Defendant’s several hospitals and for only a single year. With tens of thousands of emergency room patient visits for just one of Defendant’s hospitals during a single year, numerosity is unquestionably met in this action.

As alleged in Plaintiff’s pleadings, Defendant’s standard practice is to use a standard form admissions agreement in its Emergency Room facilities which is drafted solely by Defendant. The terms of the agreement are not dictated by statute or otherwise. All emergency care patients or their agents were presented with the agreement and asked to sign it. The questions regarding whether that document authorizes Defendant’s hospitals to bill emergency room patients a “Surcharge” and contains a promise by patients to pay that “Surcharge” are common questions applicable to all of Defendant’s emergency room patients and a simple matter of contract

interpretation. Interpretation of a form, adhesive contract is properly made on an “objective” or “reasonable person” standard and should be the same for all patients. This is particularly the case where, as here, the only issue of contract interpretation to be decided is whether the Contract itself does or does not provide for Defendant’s Surcharges. These shared and common issues are more than sufficient to meet the requirement of commonality.

Typicality is met in the instant action because Plaintiff was an emergency room patient who visited a hospital representing itself as being part of the St. David’s Healthcare system, who signed Defendant’s form Contract, and who was subsequently billed a Surcharge.

Adequacy is met by the interest shown by Plaintiff and her legal representatives who have substantial class action litigation experience.¹

V. CONCLUSION

Plaintiff seeks a contract interpretation as to Defendant’s form Contract and a finding that Defendant’s billing emergency room patients its undisclosed Surcharges is unconscionable. For the foregoing reasons, and for those that will be borne out by further class discovery, this case is appropriate for class certification pursuant to Tex. R. Civ. P. 42. Accordingly, Plaintiff, on behalf of herself and the proposed Class, respectfully requests that the Court: (i) enter and reserve ruling on Plaintiff’s Motion for Class Certification, (ii) permit discovery on class-wide issues as set forth under an appropriate case management and discovery schedule, (iii) grant Plaintiff leave to file a supplemental memorandum in support of her Motion for Class Certification upon the conclusion of class-wide discovery, (iv) grant Plaintiff’s Motion for Class Certification

¹ Law Office of Barry Kramer has extensive experience in class action litigation.

after full briefing of the issues presented herein, and (v) provide all other and further relief that the Court deems reasonable and just.

Respectfully submitted,

BLUMBERG BAGLEY PLLC

by: /s/ Daniel E. Blumberg

Daniel E. Blumberg

Texas Bar No. 02512985

daniel@blumbergbagley.com

Peter F. Bagley

Texas Bar No. 00783581

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(817) 277-1500

Facsimile (817) 277-1170

LAW OFFICE OF BARRY KRAMER

By: /s/ Barry L. Kramer

Barry L. Kramer

kramerlaw@aol.com

9550 S. Eastern Avenue, Suite 253

Las Vegas, NV 89123

(702) 778-6090

ATTORNEYS FOR PLAINTIFF

EXHIBIT 2

CITATION
THE STATE OF TEXAS

CAUSE NO. D-1-GN-19-002790

Velva L. Price
District Clerk
Travis County
D-1-GN-19-002790
Irene Silva

MELANIE MOCK, ON BEHALF OF HERSELF AND ALL OTHERS SIMILARLY SITUATED

vs.

, Plaintiff

ST. DAVID'S HEALTHCARE PARTNERSHIP, L.P., LLP, A TEXAS LIMITED LIABILITY PARTNERSHIP

, Defendant

TO: ST DAVIDS HEALTHCARE PARTNERSHIP LP LLP
d/b/a St. David's South Austin Medical Center
d/b/a St. David's HealthCare
BY SERVING ITS REGISTERED AGENT CT CORPORATION
1999 BRYAN STREET SUITE 900
DALLAS, TEXAS 75201-3136

Defendant, in the above styled and numbered cause:

YOU HAVE BEEN SUED. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 A.M. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you.

Attached is a copy of the PLAINTIFF'S ORIGINAL CLASS ACTION PETITION of the PLAINTIFF in the above styled and numbered cause, which was filed on MAY 21, 2019 in the 419TH JUDICIAL DISTRICT COURT of Travis County, Austin, Texas.

ISSUED AND GIVEN UNDER MY HAND AND SEAL of said Court at office, May 22, 2019.

REQUESTED BY:
DANIEL E. BLUMBERG
2304 W INTERSTATE 20 STE 190
ARLINGTON, TX 76017-1672
BUSINESS PHONE: (817) 277-1500 FAX: (817) 277-1170



Velva L. Price
Velva L. Price
Travis County District Clerk
Travis County Courthouse
1000 Guadalupe, P.O. Box 679003 (78767)
Austin, TX 78701

PREPARED BY: VICTORIA BENAVIDES

--- -- -- -- -- R E T U R N --- -- -- -- --
Came to hand on the 22 day of MAY, 2019 at 1:30 o'clock PM., and executed at 1999 BRYAN ST, DALLAS TEXAS within the County of DALLAS on the 22 day of MAY, 2019, at 3:20 o'clock PM., by delivering to the within named ST. DAVIDS HEALTHCARE PARTNERSHIP DELIVERED each in person, a true copy of this citation together with the PLAINTIFF'S ORIGINAL CLASS ACTION PETITION accompanying pleading, having first attached such copy of such citation to such copy of pleading and endorsed on such copy of citation the date of delivery.

TO REG. AGT CT CORPORATION

Service Fee: \$ _____

Jerry Caldwell PSA 9785
Sheriff / Constable / Authorized Person
7-31-20

Sworn to and subscribed before me this the

23rd day of MAY, 2019.

By: _____
JERRY CALDWELL
Printed Name of Server

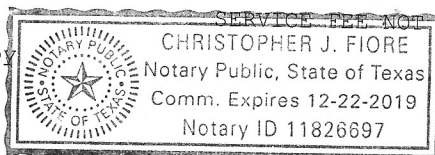
TRAVIS County, Texas

Notary Public, THE STATE OF TEXAS

D-1-GN-19-002790

Original

Service Copy



SERVICE FEE NOT PAID

P01 - 000078088

EXHIBIT 3

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

MELANIE MOCK, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

ST. DAVID'S HEALTHCARE
PARTNERSHIP, L.P., LLP,

Defendant.

§
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CIVIL ACTION NO. _____

DECLARATION OF DANIEL HUFFINE

1. My name is Daniel Huffine. I am over the age of 21, of sound mind, and I am competent and legally capable of making this declaration. The facts stated herein are true and correct and are within my personal knowledge based on my experience described below.

2. I am the Chief Financial Officer at St. David's Medical Center (the "Hospital"), which is owned by St. David's Healthcare Partnership, L.P., LLP ("St. David's"), Defendant in this lawsuit. In my position as Chief Financial Officer at the Hospital, I have obtained personal knowledge about how the Hospital and St. David's gather, maintain, and manage patient data, including data related to billing and collection for services rendered.

3. I have reviewed Plaintiff's Original Class Action Petition (the "Petition") filed by Melanie Mock in the lawsuit styled No. D-1-GN-19-002790, *Melanie Mock v. St. David's Healthcare Partnership, LP, LLP*, in the 419th Judicial District Court of Travis County, Texas. I understand that Plaintiff is trying to bring claims on behalf of a proposed class of individuals described in paragraph 6.1 of the Petition.

4. Based on the allegations in the Petition, Plaintiff's proposed class has over one million persons who (a) received treatment at an emergency department operated by St. David's within the last four years; and (b) were billed for an "emergency department facility fee."

5. Many of the individuals described in paragraph 6.1 of the Petition as members of the proposed class have mailing addresses outside of Texas in the following states: Alabama, Arizona, California, Colorado, Florida, Georgia, Illinois, Indiana Iowa, Kentucky, Louisiana, Maryland, New Mexico, New York, South Carolina, and Tennessee.

6. For example, three patients were admitted to the Hospital's emergency department on or around May 21, 2019—the date on which Plaintiff filed the Petition—and provided mailing addresses outside of Texas: (a) patient M.P. provided a mailing address in Indiana; (b) patient S.B. provided a mailing address in Maryland; and (c) patient T.C. provided a mailing address in Louisiana.¹

7. The individuals described as proposed class members in paragraph 6.1 of the Petition were billed over \$5,000,000 (exclusive of interest and costs) for the emergency room facility fee at issue in this lawsuit. By providing this number, neither the Hospital nor St. David's admits that the emergency room facility fee was in any way improper.

8. I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 12th, 2019, in Austin, Texas.


Daniel Huffine

¹ Because patient confidentiality must be maintained under the Health Insurance Portability and Accountability Act and there is no protective order in place yet, I use the patients' initials to protect confidentiality and have refrained from disclosing detailed information about the patients.

EXHIBIT 4

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

MELANIE MOCK, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

ST. DAVID’S HEALTHCARE
PARTNERSHIP, L.P., LLP,

Defendant.

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CIVIL ACTION NO. _____

DECLARATION OF WILLIAM M. KATZ, JR.

1. My name is William M. Katz, Jr. I am over the age of 21, of sound mind, and I am competent and legally capable of making this declaration. The facts stated herein are true and correct and based on my personal knowledge.

2. I am a partner at the law firm of Thompson & Knight LLP, and I am licensed to practice law in California, the District of Columbia, New York, and Texas. I am counsel for Defendant St. David’s Healthcare Partnership, L.P., LLP (“St. David’s”) in the above-referenced matter.

3. As noted in the declaration from Daniel Huffine, Chief Financial Officer for St. David’s Medical Center, St. David’s has identified certain patients who provided mailing addresses outside of Texas. For example, patient S.B. provided a mailing address in Maryland; patient M.P. provided a mailing address in Indiana; and patient T.C. provided a mailing address in Louisiana.¹

¹ Because patient confidentiality must be maintained under the Health Insurance Portability and Accountability Act and there is no protective order in place yet, I use the patients’ initials, have redacted certain information in the attached documents to protect confidentiality, and have refrained from disclosing detailed information about the patients.

4. I have taken the information about these three patients and had additional research and analysis performed to determine whether those individuals currently reside outside of Texas, have driver's licenses or professional licenses from states other than Texas, have vehicles registered in states other than Texas, are registered to vote in states other than Texas, and own real or personal property outside of Texas. The results of this research and analysis are explained below and establish that these three patients are citizens of states other than Texas.

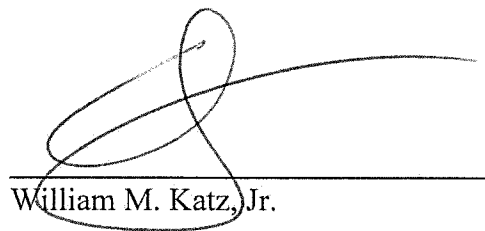
5. S.B. received services from St. David's on May 21, 2019, the date on which Plaintiff filed the Petition. Upon admission at St. David's, S.B. provided a mailing address in Bethesda, Maryland. Attached as **Exhibit A** are true and correct copies of redacted documents establishing that S.B. holds a Maryland driver's license, has a vehicle registered in Maryland, owns real property in Bethesda, Maryland, and currently resides in Bethesda, Maryland.

6. M.P. received services from St. David's on May 20, 2019, the day before Plaintiff filed the Petition. Upon admission at St. David's, M.P. provided a mailing address in Kokomo, Indiana. Attached as **Exhibit B** are true and correct copies of redacted documents establishing that M.P. owns a vehicle registered in Indiana, holds a nursing license issued by the Indiana State Board of Nursing, works in Indiana, owns real property in Kokomo, Indiana, and currently resides in Kokomo, Indiana.

7. T.C. also received services from St. David's on May 20, 2019, the day before Plaintiff filed the Petition. Upon admission at St. David's, T.C. provided a mailing address in New Orleans, Louisiana. Attached as **Exhibit C** are true and correct copies of redacted documents establishing that T.C. owns a vehicle that is registered in Louisiana, is registered to vote in Louisiana, and currently resides in New Orleans, Louisiana.

8. I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 13, 2019, in Dallas, Texas.



William M. Katz, Jr.

EXHIBIT A

Important: The Public Records and commercially available data sources used on reports have errors. Data is sometimes entered poorly, processed incorrectly and is generally not free from defect. This system should not be relied upon as definitively accurate. Before relying on any data this system supplies, it should be independently verified. For Secretary of State documents, the following data is for information purposes only and is not an official record. Certified copies may be obtained from that individual state's Department of State. The criminal record data in this product or service may include records that have been expunged, sealed, or otherwise have become inaccessible to the public since the date on which the data was last updated or collected.

Accurint does not constitute a "consumer report" as that term is defined in the federal Fair Credit Reporting Act, 15 USC 1681 et seq. (FCRA). Accordingly, Accurint may not be used in whole or in part as a factor in determining eligibility for credit, insurance, employment or another permissible purpose under the FCRA.

Your DPPA Permissible Use: Civil, Criminal, Administrative, or Arbitral Proceedings

Your GLBA Permissible Use: Legal Compliance

Your DMF Permissible Use: Legitimate Business Purpose Pursuant to a Law, Government Rule, Regulation, or Fiduciary Duty




Comprehensive Report

Date: 06/05/19

Report processed by:

THOMPSON & KNIGHT
1722 ROUTH STREET
Dallas, TX 75201-2532
214-969-1700 Main Phone

Report Legend:

-  - Shared Address
-  - Deceased
-  - Probable Current Address

Subject Information

(Best Information for Subject)

Name: S [redacted] E [redacted]
Date of Birth: [redacted]
Age: [redacted]
SSN: [redacted] issued in Maryland
between [redacted] and [redacted]
[View All Sources](#)

AKAs

(Names Associated with Subject)

S [redacted] E [redacted]
Age: [redacted] SSN: [redacted]
S [redacted] E [redacted]
Age: [redacted] SSN: [redacted]
S [redacted] E [redacted]
Age: [redacted] SSN: [redacted]
S [redacted] E [redacted]
Age: [redacted] SSN: [redacted]
S [redacted] E [redacted]
Age: 65 SSN: [redacted]
S B [redacted]
Age: 65 SSN: [redacted]
S [redacted]
Age: [redacted] SSN: [redacted]
S [redacted]
Age: [redacted] SSN: [redacted]
S [redacted]
Age: [redacted] SSN: [redacted]
Utility Locator - Connect Date: 8/2/2011
S [redacted]
Age: [redacted] SSN: [redacted]

Indicators

Bankruptcy: **No**
Property: **Yes**
Corporate Affiliations: **No**

Others Associated With Subjects SSN:

(DOES NOT usually indicate any type of fraud or deception)

[None Found]

Address Summary: [View All Address Variation Sources](#)

[redacted], BETHESDA, MD 20814-6118, MONTGOMERY COUNTY
(Sep 1987 - May 2019)
Utility Locator - Connect Date: 8/2/2011
[redacted] CENTER SANDWICH, NH 03227-3150, CARROLL COUNTY
(2009 - 2018)
[redacted] CHEVY CHASE, MD 20815-6615, MONTGOMERY COUNTY
(Jun 2009 - Mar 2011)
[redacted] BETHESDA, MD 20816-1874, MONTGOMERY COUNTY (May 1988 - Nov 2006)
[redacted] WASHINGTON, DC 20003-1140, D.C COUNTY (Jan 1983 - Jan 2003)
[redacted] CHEVY CHASE, MD 20815-5442, MONTGOMERY COUNTY
(Jul 1984 - Sep 2001)
[redacted] NEW YORK, NY 10128-0679, NEW YORK COUNTY (Jan 1983 - Dec 1992)
[redacted] WASHINGTON, DC 20001-5129, D.C COUNTY (Mar 1985 - Apr 1986)
[redacted] WASHINGTON, DC (Jun 1985)

Active Address(es): [View All Address Variation Sources](#)

[None Found]

Previous And Non-Verified Address(es): [View All Address Variation Sources](#)

[REDACTED] [BETHESDA, MD 20814-6118, MONTGOMERY COUNTY](#)
(Sep 1987 - May 2019)

Utility Locator - Connect Date: 8/2/2011

Name Associated with Address:

S [REDACTED] I [REDACTED] E [REDACTED]

Current Residents at Address:

S [REDACTED] I [REDACTED] E [REDACTED]

Property Ownership Information for this Address

Property:

Parcel Number - [REDACTED]

Book - [REDACTED]

Page - [REDACTED]

Owner Name: S [REDACTED] I [REDACTED] E [REDACTED]

Owner Name 2: [REDACTED]

Property Address: - [REDACTED] [BETHESDA, MD 20814-6118, MONTGOMERY COUNTY](#)

Sale Date - [REDACTED]

Sale Price - [REDACTED]

Land Usage - [REDACTED]

Subdivision Name - [REDACTED]

Total Market Value - [REDACTED]

Assessed Value - [REDACTED]

Land Value - [REDACTED]

Improvement Value - [REDACTED]

Land Size - [REDACTED]

Year Built - [REDACTED]

Seller Name: [REDACTED]

Legal Description - [REDACTED]

Data Source - [REDACTED]

Neighborhood Profile (2010 Census)

Average Age: [REDACTED]

Median Household Income: [REDACTED]

Median Owner Occupied Home Value: [REDACTED]

Average Years of Education: [REDACTED]

[REDACTED] [CENTER SANDWICH, NH 03227-3150, CARROLL COUNTY](#)
(2009 - 2018)

Name Associated with Address:

S [REDACTED] I [REDACTED] E [REDACTED]

Current Residents at Address:

[REDACTED]

Property Ownership Information for this Address

Property:

Parcel Number - [REDACTED]

Owner Name: S [REDACTED] I [REDACTED] E [REDACTED]

Owner Name 2: [REDACTED]

Property Address: - [REDACTED] [SANDWICH, NH 03227-3150, CARROLL COUNTY](#)

Owner Address: [REDACTED] [BETHESDA, MD 20814-6118, MONTGOMERY COUNTY](#)

Assessed Value - [REDACTED]

Year Built - [REDACTED]

Data Source - [REDACTED]

Neighborhood Profile (2010 Census)

Average Age: [REDACTED]

Median Household Income: [REDACTED]

Median Owner Occupied Home Value: [REDACTED]

Average Years of Education: [REDACTED]

[REDACTED] [CHEVY CHASE, MD 20815-6615, MONTGOMERY COUNTY](#)
(Jun 2009 - Mar 2011)

Name Associated with Address:

S [REDACTED] B [REDACTED]

Current Residents at Address:

[REDACTED]

Property Ownership Information for this Address

Property:

Parcel Number - [REDACTED]
 Book - [REDACTED]
 Page - [REDACTED]
 Owner Name: [REDACTED]
 Owner Name 2: [REDACTED]
 Property Address: - [REDACTED]
 [REDACTED]
 Sale Date - [REDACTED]
 Sale Price - [REDACTED]
 Land Usage - [REDACTED]
 Subdivision Name - [REDACTED]
 Total Market Value - [REDACTED]
 Assessed Value - [REDACTED]
 Land Value - [REDACTED]
 Improvement Value - [REDACTED]
 Land Size - [REDACTED]
 Year Built - [REDACTED]
 Seller Name: [REDACTED]
 Legal Description - [REDACTED]
 Loan Amount - [REDACTED]
 Loan Type - [REDACTED]
 Lender Name - [REDACTED]
 Data Source - [REDACTED]

Neighborhood Profile (2010 Census)

Average Age: [REDACTED]
 Median Household Income: [REDACTED]
 Median Owner Occupied Home Value: [REDACTED]
 Average Years of Education: [REDACTED]

[BETHESDA, MD 20816-1874, MONTGOMERY COUNTY](#) (May 1988 - Nov 2006)

Name Associated with Address:

S [REDACTED] P [REDACTED]

Current Residents at Address:

[REDACTED]

Property Ownership Information for this Address

Property:

Parcel Number - [REDACTED]
 Book - [REDACTED]
 Page - [REDACTED]
 Owner Name: [REDACTED]
 Owner Name 2: [REDACTED]
 Property Address: - [REDACTED]
 [REDACTED]
 Sale Date - [REDACTED]
 Sale Price - [REDACTED]
 Land Usage - [REDACTED]
 Total Market Value - [REDACTED]
 Assessed Value - [REDACTED]
 Land Value - [REDACTED]
 Improvement Value - [REDACTED]
 Land Size - [REDACTED]
 Year Built - [REDACTED]
 Seller Name: [REDACTED]
 Seller Name 2: [REDACTED]
 Legal Description - [REDACTED]
 Loan Amount - [REDACTED]
 Loan Type - [REDACTED]
 Lender Name - [REDACTED]
 Data Source - [REDACTED]

Neighborhood Profile (2010 Census)

Average Age: [REDACTED]
 Median Household Income: [REDACTED]
 Median Owner Occupied Home Value: [REDACTED]
 Average Years of Education: [REDACTED]
 [REDACTED] WASHINGTON, DC 20003-1140, D.C COUNTY (Jan 1983 - Jan 2003)

Name Associated with Address:

S [REDACTED] E [REDACTED]

Current Residents at Address:

[REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]

Property Ownership Information for this Address

Property:

Parcel Number - [REDACTED]
 Owner Name: [REDACTED]
 Owner Name 2: [REDACTED]
 Property Address: - [REDACTED]
 Sale Price - [REDACTED]
 Total Market Value - [REDACTED]
 Assessed Value - [REDACTED]
 Land Value - [REDACTED]
 Improvement Value - [REDACTED]
 Land Size - [REDACTED]
 Year Built - [REDACTED]
 Legal Description - [REDACTED]
 Data Source - [REDACTED]

Neighborhood Profile (2010 Census)

Average Age: [REDACTED]
 Median Household Income: [REDACTED]
 Median Owner Occupied Home Value: [REDACTED]
 Average Years of Education: [REDACTED]
 [REDACTED] CHEVY CHASE, MD 20815-5442, MONTGOMERY COUNTY

(Jul 1984 - Sep 2001)

Name Associated with Address:

S [REDACTED] E [REDACTED]

Current Residents at Address:

[REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]

Property Ownership Information for this Address

Property:

Parcel Number - [REDACTED]
 Book - [REDACTED]
 Page - [REDACTED]
 Owner Name: [REDACTED]
 Owner Name 2: [REDACTED]
 Property Address: - [REDACTED]
 [REDACTED]
 Sale Date - [REDACTED]
 Sale Price - [REDACTED]
 Land Usage - [REDACTED]
 Subdivision Name - [REDACTED]
 Total Market Value - [REDACTED]
 Assessed Value - [REDACTED]
 Land Value - [REDACTED]
 Improvement Value - [REDACTED]
 Land Size - [REDACTED]
 Year Built - [REDACTED]
 Seller Name: [REDACTED]
 Seller Name 2: [REDACTED]
 Legal Description - [REDACTED]

Loan Amount - [REDACTED]
Loan Type - [REDACTED]
Lender Name - [REDACTED]
Data Source - [REDACTED]

Neighborhood Profile (2010 Census)

Average Age: [REDACTED]
Median Household Income: [REDACTED]
Median Owner Occupied Home Value: [REDACTED]
Average Years of Education: [REDACTED]

[REDACTED] NEW YORK, NY 10128-0679, NEW YORK COUNTY (Jan 1983 - Dec 1992)

Name Associated with Address:

S [REDACTED] E [REDACTED]

Current Residents at Address:

[REDACTED]

Property Ownership Information for this Address

Property:

Parcel Number - [REDACTED]
Book - [REDACTED]
Page - [REDACTED]
Owner Name: [REDACTED]
Property Address: - [REDACTED] NEW YORK, NY 10128-0659, NEW YORK

COUNTY

Sale Date - [REDACTED]
Land Usage - [REDACTED]
Total Market Value - [REDACTED]
Assessed Value - [REDACTED]
Land Value - [REDACTED]
Improvement Value - [REDACTED]
Land Size - [REDACTED]
Year Built - [REDACTED]
Seller Name: [REDACTED]
Data Source - [REDACTED]

Neighborhood Profile (2010 Census)

Average Age: [REDACTED]
Median Household Income: [REDACTED]
Median Owner Occupied Home Value: [REDACTED]
Average Years of Education: [REDACTED]

[REDACTED] WASHINGTON, DC 20001-5129, D.C COUNTY (Mar 1985 - Apr 1986)

Name Associated with Address:

S [REDACTED] E [REDACTED]

Current Residents at Address:

[REDACTED]

Property Ownership Information for this Address

Property:

Parcel Number - [REDACTED]
Owner Name: [REDACTED]
Owner Name 2: [REDACTED]
Property Address: - [REDACTED] WASHINGTON, DC 20001-5129, D.C COUNTY

Sale Date - [REDACTED]
Sale Price - [REDACTED]
Subdivision Name - [REDACTED]
Total Market Value - [REDACTED]
Assessed Value - [REDACTED]
Land Value - [REDACTED]
Improvement Value - [REDACTED]
Land Size - [REDACTED]
Year Built - [REDACTED]
Seller Name: [REDACTED]
Loan Amount - [REDACTED]
Loan Type - [REDACTED]
Lender Name - [REDACTED]
Data Source - [REDACTED]

Neighborhood Profile (2010 Census)

Average Age: [REDACTED]
Median Household Income: [REDACTED]

Median Owner Occupied Home Value: [REDACTED]

Average Years of Education: [REDACTED]

[REDACTED] WASHINGTON, DC (Jun 1985)

Name Associated with Address:

S [REDACTED] P [REDACTED]

Bankruptcies:

[None Found]

UCC Filings:

[None Found]

Phones Plus:

[None Found]

People at Work:

Maximum 50 People at Work records returned

[None Found]

Driver's License Information:

Name: S [REDACTED] E [REDACTED]

DL Number: xxxxxxxxxxxxxx

State: Maryland

License Address: [REDACTED] BETHESDA, MD 20814-6118, MONTGOMERY COUNTY

DOB: [REDACTED]

Potential SSN [REDACTED]

Gender: [REDACTED]

Expiration Date: [REDACTED]

Height: [REDACTED]

Weight: [REDACTED]

Data Source: [REDACTED]

Restrictions: [REDACTED]

Possible Properties Owned by Subject:

Property:

Parcel Number - [REDACTED]

Owner Name: S [REDACTED] E [REDACTED]

Owner Name 2: [REDACTED]

Property Address: - [REDACTED] SANDWICH, NH 03227-3150, CARROLL

COUNTY

Owner Address: [REDACTED] BETHESDA, MD 20814-6118, MONTGOMERY COUNTY

Assessed Value - [REDACTED]

Year Built - [REDACTED]

Data Source - [REDACTED]

Property:

Parcel Number - [REDACTED]

Book - [REDACTED]

Page - [REDACTED]

Owner Name: S [REDACTED] E [REDACTED]

Owner Name 2: [REDACTED]

Property Address: - [REDACTED] BETHESDA, MD 20814-6118, MONTGOMERY

COUNTY

Sale Date - [REDACTED]

Sale Price - [REDACTED]

Land Usage - [REDACTED]

Subdivision Name - [REDACTED]

Total Market Value - [REDACTED]

Assessed Value - [REDACTED]

Land Value - [REDACTED]

Improvement Value - [REDACTED]

Land Size - [REDACTED]
Year Built - [REDACTED]
Seller Name: [REDACTED]
Legal Description - [REDACTED]
Data Source - [REDACTED]

Property:

Parcel Number - [REDACTED]
Book - [REDACTED]
Page - [REDACTED]
Owner Name: S [REDACTED] B [REDACTED]
Property Address - [REDACTED] SANDWICH, NH 03227-3150, CARROLL

COUNTY

Seller Name: S [REDACTED] -B [REDACTED]
Seller Name 2: [REDACTED]
Loan Type - [REDACTED]
Data Source - [REDACTED]

Property:

Parcel Number - [REDACTED]
Book - [REDACTED]
Page - [REDACTED]
Owner Name: S [REDACTED] B [REDACTED]
Property Address: - [REDACTED] SANDWICH, NH 03227-3150, CARROLL

COUNTY

Sale Price - [REDACTED]
Land Usage - [REDACTED]
Assessed Value - [REDACTED]
Land Size - [REDACTED]
Year Built - [REDACTED]
Seller Name: [REDACTED]
Loan Amount - [REDACTED]
Loan Type - [REDACTED]
Lender Name - [REDACTED]
Data Source - [REDACTED]

Property:

Parcel Number - [REDACTED]
Book - [REDACTED]
Page - [REDACTED]
Owner Name: S [REDACTED] B [REDACTED]
Owner Name 2: [REDACTED]
Property Address - [REDACTED] BETHESDA, MD 20814-6118, MONTGOMERY

COUNTY

Owner Address: [REDACTED] BETHESDA, MD 20814-6118, MONTGOMERY COUNTY
Sale Date - [REDACTED]
Seller Name: S [REDACTED] B [REDACTED]
Loan Type - [REDACTED]
Data Source - [REDACTED]

Property:

Parcel Number - [REDACTED]
Owner Name: S [REDACTED] B [REDACTED]
Owner Name 2: [REDACTED]
Property Address: - [REDACTED] SANDWICH, NH 03227-3150, CARROLL

COUNTY

Owner Address: [REDACTED] BETHESDA, MD 20814-6118, MONTGOMERY COUNTY
Assessed Value - [REDACTED]
Year Built - [REDACTED]
Data Source - [REDACTED]

Property:

Parcel Number - [REDACTED]
Book - [REDACTED]
Page - [REDACTED]
Owner Name: S [REDACTED] B [REDACTED]
Owner Name 2: [REDACTED]
Property Address: - [REDACTED] SANDWICH, NH 03227-3150, CARROLL

COUNTY

Owner Address: [REDACTED] SANDWICH, NH 03227-3150, CARROLL COUNTY
Sale Price - [REDACTED]
Land Usage - [REDACTED]
Land Size - [REDACTED]
Seller Name: [REDACTED]
Legal Description - [REDACTED]
Loan Amount - [REDACTED]
Loan Type - [REDACTED]
Lender Name - [REDACTED]
Data Source - [REDACTED]

Property:

Parcel Number - [REDACTED]
Book - [REDACTED]
Page - [REDACTED]
Owner Name: S [REDACTED] -E [REDACTED]
Owner Name 2: [REDACTED]

COUNTY

Property Address - [REDACTED] SANDWICH, NH 03227-3150, CARROLL

Sale Price - [REDACTED]
Seller Name: [REDACTED]
Loan Amount - [REDACTED]
Loan Type - [REDACTED]
Data Source - [REDACTED]

Property:

Parcel Number - [REDACTED]
Book - [REDACTED]
Page - [REDACTED]
Owner Name: S [REDACTED] E [REDACTED]

COUNTY

Property Address - [REDACTED] BETHESDA, MD 20814-6118, MONTGOMERY

Sale Date - [REDACTED]
Loan Amount - [REDACTED]
Loan Type - [REDACTED]
Data Source - [REDACTED]

Property:

Parcel Number - [REDACTED]
Book - [REDACTED]
Page - [REDACTED]
Owner Name: S [REDACTED] E [REDACTED]

COUNTY

Property Address: - [REDACTED] BETHESDA, MD 20814-6118, MONTGOMERY

Owner Address: [REDACTED] BETHESDA, MD 20814-6118, MONTGOMERY COUNTY
Sale Date - [REDACTED]
Sale Price - [REDACTED]
Land Usage - [REDACTED]
Subdivision Name - [REDACTED]
Total Market Value - [REDACTED]
Assessed Value - [REDACTED]
Land Value - [REDACTED]
Improvement Value - [REDACTED]
Land Size - [REDACTED]
Year Built - [REDACTED]
Seller Name: [REDACTED]
Legal Description - [REDACTED]
Data Source - [REDACTED]

Motor Vehicles Registered To Subject:

Vehicle:

Description: [REDACTED]
VIN: [REDACTED]
State Of Origin: MARYLAND
Engine: 4 Cylinder 150 Cubic Inch
Anti Lock Brakes: 4 wheel standard

Air Conditioning: Standard
Daytime Running Lights: Standard
Power Steering: Standard
Power Brakes: Standard
Power Windows: Standard
Security System: Passive Engine Immobilizer, Keyless Entry & Alarm
Roof: Power sun/moon roof
Price: [REDACTED]
Radio: AM/FM CD/MP3
Front Wheel Drive: No
Four Wheel Drive: No
Tilt Wheel: Standard
Data Source: Governmental

Registrant(s)

Record Type: CURRENT
Name: S [REDACTED] B [REDACTED]
Potential SSN: [REDACTED]
Address: [REDACTED] BETHESDA, MD 20814-6118, MONTGOMERY COUNTY
DOB: [REDACTED]
Sex: [REDACTED]
Age: [REDACTED]
DL #: xxxxxxxxxxxxxx
Tag Number: [REDACTED]
License State: MD
Earliest Registration Date: [REDACTED]
Latest Registration Date: [REDACTED]
Expiration Date: [REDACTED]

Vehicle:

Description: [REDACTED]
VIN: [REDACTED]
State Of Origin: MARYLAND
Engine: 4 Cylinder 150 Cubic Inch
Anti Lock Brakes: 4 wheel standard
Air Conditioning: Standard
Daytime Running Lights: Standard
Power Steering: Standard
Power Brakes: Standard
Power Windows: Standard
Security System: Passive Engine Immobilizer, Keyless Entry & Alarm
Roof: Power sun/moon roof
Price: [REDACTED]
Radio: AM/FM CD/MP3
Front Wheel Drive: No
Four Wheel Drive: No
Tilt Wheel: Standard
Data Source: Governmental

Owner(s)

Name: S [REDACTED] B [REDACTED]
Potential SSN: [REDACTED]
Address: [REDACTED] BETHESDA, MD 20814-6118, MONTGOMERY COUNTY
DOB: [REDACTED]
Sex: [REDACTED]
Age: [REDACTED]
DL #: xxxxxxxxxxxxxx
Title Number: [REDACTED]
Title Issue Date: [REDACTED]

Lien Holder(s)

None

Vehicle:

Description: [REDACTED]

VIN: [REDACTED]
 State Of Origin: MARYLAND
 Engine: 4 Cylinder 122 Cubic Inch
 Anti Lock Brakes: 4 wheel standard
 Air Conditioning: Standard
 Daytime Running Lights: Standard
 Power Steering: Standard
 Power Brakes: Standard
 Power Windows: Standard
 Security System: Passive Engine Immobilizer & keyless entry
 Roof: Power sun/moon roof
 Price: [REDACTED]
 Radio: AM/FM CD/MP3
 Front Wheel Drive: No
 Four Wheel Drive: Yes
 Tilt Wheel: Standard
 Data Source: Governmental

Registrant(s)

Record Type: CURRENT
 Name: S [REDACTED] B [REDACTED]
 Potential SSN: [REDACTED]
 Address: [REDACTED] BETHESDA, MD 20814-6118, MONTGOMERY COUNTY
 DOB: [REDACTED]
 Sex: [REDACTED]
 Age: [REDACTED]
 DL #: xxxxxxxxxxxxxx
 Tag Number: [REDACTED]
 License State: MD
 Earliest Registration Date: [REDACTED]
 Latest Registration Date: [REDACTED]
 Expiration Date: [REDACTED]

Vehicle:

Description: [REDACTED]
 VIN: [REDACTED]
 State Of Origin: MARYLAND
 Engine: 4 Cylinder 122 Cubic Inch
 Anti Lock Brakes: 4 wheel standard
 Air Conditioning: Standard
 Daytime Running Lights: Standard
 Power Steering: Standard
 Power Brakes: Standard
 Power Windows: Standard
 Security System: Passive Engine Immobilizer & keyless entry
 Roof: Power sun/moon roof
 Price: [REDACTED]
 Radio: AM/FM CD/MP3
 Front Wheel Drive: No
 Four Wheel Drive: Yes
 Tilt Wheel: Standard
 Data Source: Governmental

Owner(s)

Name: S [REDACTED] B [REDACTED]
 Potential SSN: [REDACTED]
 Address: [REDACTED] BETHESDA, MD 20814-6118, MONTGOMERY COUNTY
 DOB: [REDACTED]
 Sex: [REDACTED]
 Age: [REDACTED]
 DL #: xxxxxxxxxxxxxx
 Title Number: [REDACTED]
 Title Issue Date: [REDACTED]

Lien Holder(s)

None

Vehicle:

Description: [REDACTED]
 VIN: [REDACTED]
 State Of Origin: MARYLAND
 Engine: 6 Cylinder 183 Cubic Inch
 Anti Lock Brakes: 4 wheel standard
 Air Conditioning: Standard
 Daytime Running Lights: Standard
 Power Steering: Standard
 Power Brakes: Standard
 Power Windows: Standard
 Security System: Passive Immobilize Key, Keyless entry, and alarm
 Roof: Power sun/moon roof
 Price: [REDACTED]
 Radio: AM/FM CD/MP3
 Front Wheel Drive: No
 Four Wheel Drive: Yes
 Tilt Wheel: Standard
 Data Source: Governmental

Registrant(s)

Record Type: HISTORICAL
 Name: S [REDACTED] B [REDACTED]
 Potential SSN: [REDACTED]
 Address: [REDACTED] BETHESDA, MD 20814-6118, MONTGOMERY COUNTY
 DOB: [REDACTED]
 Sex: [REDACTED]
 Age: [REDACTED]
 DL #: xxxxxxxxxxxxxx
 Tag Number: [REDACTED]
 License State: MD
 Earliest Registration Date: [REDACTED]
 Latest Registration Date: [REDACTED]
 Expiration Date: [REDACTED]

Vehicle:

Description: [REDACTED]
 VIN: [REDACTED]
 State Of Origin: MARYLAND
 Engine: 6 Cylinder 183 Cubic Inch
 Anti Lock Brakes: 4 wheel standard
 Air Conditioning: Standard
 Daytime Running Lights: Standard
 Power Steering: Standard
 Power Brakes: Standard
 Power Windows: Standard
 Security System: Passive Immobilize Key, Keyless entry, and alarm
 Roof: Power sun/moon roof
 Price: [REDACTED]
 Radio: AM/FM CD/MP3
 Front Wheel Drive: No
 Four Wheel Drive: Yes
 Tilt Wheel: Standard
 Data Source: Governmental

Owner(s)

Name: S [REDACTED] B [REDACTED]
 Potential SSN: [REDACTED]
 Address: [REDACTED] BETHESDA, MD 20814-6118, MONTGOMERY COUNTY
 DOB: [REDACTED]
 Sex: [REDACTED]
 Age: [REDACTED]
 DL #: xxxxxxxxxxxxxx
 Title Number: [REDACTED]

Title Issue Date: 7/3/2013

Lien Holder(s)
None

Vehicle:

Description: [REDACTED]
VIN: [REDACTED]
State Of Origin: MARYLAND
Engine: 6 Cylinder 152 Cubic Inch
Anti Lock Brakes: 4 wheel standard
Air Conditioning: Standard
Daytime Running Lights: Optional
Power Steering: Standard
Power Brakes: Standard
Power Windows: Standard
Security System: Pass key
Roof: None / not available
Price: [REDACTED]
Radio: AM/FM Cassette
Front Wheel Drive: No
Four Wheel Drive: No
Tilt Wheel: Standard
Data Source: Governmental

Registrant(s)

Record Type: HISTORICAL
Name: S [REDACTED] B [REDACTED]
Potential SSN: [REDACTED]
Address: [REDACTED] BETHESDA, MD 20814-6118, MONTGOMERY COUNTY
DOB: [REDACTED]
Sex: [REDACTED]
Age: [REDACTED]
DL #: xxxxxxxxxxxxxx
Tag Number: [REDACTED]
License State: MD
Earliest Registration Date: [REDACTED]
Latest Registration Date: [REDACTED]
Expiration Date: [REDACTED]

Vehicle:

Description: [REDACTED]
VIN: [REDACTED]
State Of Origin: MARYLAND
Engine: 6 Cylinder 152 Cubic Inch
Anti Lock Brakes: 4 wheel standard
Air Conditioning: Standard
Daytime Running Lights: Optional
Power Steering: Standard
Power Brakes: Standard
Power Windows: Standard
Security System: Pass key
Roof: None / not available
Price: [REDACTED]
Radio: AM/FM Cassette
Front Wheel Drive: No
Four Wheel Drive: No
Tilt Wheel: Standard
Data Source: Governmental

Owner(s)

Name: S [REDACTED] B [REDACTED]
Potential SSN: [REDACTED]
Address: [REDACTED] BETHESDA, MD 20814-6118, MONTGOMERY COUNTY
DOB: [REDACTED]

Sex: [REDACTED]
Age: [REDACTED]
DL #: xxxxxxxxxxxxxxxx
Title Number: [REDACTED]
Title Issue Date: [REDACTED]

Lien Holder(s)
None

Vehicle:

Description: [REDACTED]
VIN: [REDACTED]
State Of Origin: MARYLAND
Engine: 6 Cylinder 182 Cubic Inch
Anti Lock Brakes: 4 wheel optional
Air Conditioning: Standard
Daytime Running Lights: Optional
Power Steering: Standard
Power Brakes: Standard
Power Windows: Standard
Security System: None
Roof: None / not available
Price: [REDACTED]
Radio: AM/FM
Front Wheel Drive: Yes
Four Wheel Drive: No
Tilt Wheel: Standard
Data Source: Governmental

Owner(s)

Name: [REDACTED]
Address: [REDACTED]
DOB: [REDACTED]
Sex: [REDACTED]
Age: [REDACTED]
Title Number: [REDACTED]
Title Issue Date: 3/17/1997

Registrant(s)

Record Type: EXPIRED
Name: S [REDACTED] B [REDACTED]
Potential SSN: [REDACTED]
Address: [REDACTED] BETHESDA, MD 20814-6118, MONTGOMERY COUNTY
DOB: [REDACTED]
Sex: [REDACTED]
Age: [REDACTED]
DL #: xxxxxxxxxxxxxxxx
Tag Number: [REDACTED]
Earliest Registration Date: [REDACTED]
Latest Registration Date: [REDACTED]
Expiration Date: [REDACTED]

Lien Holder(s)
None

Watercraft:
[None Found]

FAA Certifications:
[None Found]

FAA Aircrafts:
[None Found]

Possible Criminal Records:

[None Found]

Sexual Offenses:

[None Found]

Florida Accidents:

[None Found]

Professional License(s):

[None Found]

Voter Registration:

[None Found]

Hunting/Fishing Permit:

Name: S [REDACTED] B [REDACTED]
Address: [REDACTED] BETHESDA, MD 20814-6118
Permit Type: Hunting
Home State: Maryland
Permit State: Montana

Concealed Weapons Permit:

[None Found]

Possible Associates:

D [REDACTED]
[REDACTED]
[REDACTED]
D [REDACTED]
[REDACTED]
[REDACTED]
D [REDACTED]
[REDACTED]
[REDACTED]
D [REDACTED]
[REDACTED]
[REDACTED]
D [REDACTED]
[REDACTED]
[REDACTED]
D [REDACTED]
[REDACTED]
[REDACTED]
D [REDACTED]
[REDACTED]
[REDACTED]
S [REDACTED]
[REDACTED]
[REDACTED]

[Redacted text block]

[Redacted text block]

[Redacted text block]

[Redacted text block]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[Redacted]

Possible Relative Summary: *(Click on name to link to more details within this report - No Charge)*

[Redacted]

- D [Redacted]
- D [Redacted]
- D [Redacted]
- D [Redacted]
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- D [Redacted]
- D [Redacted]


[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

 [REDACTED] BETHESDA, MD 20814-6118, MONTGOMERY COUNTY
(Dec 1990 - Nov 2012)

Current Residents at Address:

 [REDACTED]

 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]


[REDACTED]

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[REDACTED] as deceased.

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[REDACTED]

[REDACTED]

Neighbors:

Neighborhood:

[REDACTED] BETHESDA, MD 20814-6118, MONTGOMERY COUNTY
(Sep 1987 - May 2019)

S [REDACTED] E [REDACTED] DOB: [REDACTED]
[REDACTED] issued in Maryland between [REDACTED] and [REDACTED]

Address(es):

✓ [REDACTED] BETHESDA, MD 20814-6117, MONTGOMERY COUNTY
(Sep 1987 - Mar 2019)

Residents:

[REDACTED]

[Redacted]

Current phones listed at this address:

[Redacted]

[Redacted] BETHESDA, MD 20814-6117, MONTGOMERY COUNTY
(Sep 1987 - Mar 2019)

Residents:

[Redacted]

[Redacted] BETHESDA, MD 20814-6117, MONTGOMERY COUNTY
(May 1985 - Mar 2019)

Residents:

[Redacted]

Current phones listed at this address:

[Redacted]

[Redacted] BETHESDA, MD 20814-6118, MONTGOMERY COUNTY
(Aug 1987 - Mar 2019)

Residents:

[Redacted]

Neighborhood:

[Redacted] CENTER SANDWICH, NH 03227-3150, CARROLL COUNTY

Address(es):

COUNTY  [REDACTED] CENTER SANDWICH, NH 03227-3150, CARROLL

[REDACTED] CENTER SANDWICH, NH 03227-3140, CARROLL COUNTY

Residents:

[REDACTED]
[REDACTED]
[REDACTED]

 [REDACTED] CENTER SANDWICH, NH 03227-3150, CARROLL COUNTY

[REDACTED]
[REDACTED]

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[REDACTED]
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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



Source Information:

All Sources	126 Source Document(s)
Driver Licenses	1 Source Document(s)
Motor Vehicle Registrations	10 Source Document(s)
Person Locator 1	7 Source Document(s)
Hunting and Fishing Licenses	1 Source Document(s)
Historical Person Locator	17 Source Document(s)
Person Locator 2	16 Source Document(s)
Deed Transfers	6 Source Document(s)
Tax Assessor Records	48 Source Document(s)
Utility Locator	2 Source Document(s)
Person Locator 4	2 Source Document(s)
Person Locator 5	9 Source Document(s)
Person Locator 6	7 Source Document(s)

EXHIBIT B

Important: The Public Records and commercially available data sources used on reports have errors. Data is sometimes entered poorly, processed incorrectly and is generally not free from defect. This system should not be relied upon as definitively accurate. Before relying on any data this system supplies, it should be independently verified. For Secretary of State documents, the following data is for information purposes only and is not an official record. Certified copies may be obtained from that individual state's Department of State. The criminal record data in this product or service may include records that have been expunged, sealed, or otherwise have become inaccessible to the public since the date on which the data was last updated or collected.

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Your DPPA Permissible Use: Civil, Criminal, Administrative, or Arbitral Proceedings
Your GLBA Permissible Use: Legal Compliance
Your DMF Permissible Use: Legitimate Business Purpose Pursuant to a Law, Government Rule, Regulation, or Fiduciary Duty

Comprehensive Report

Date: 06/05/19

Report processed by:
THOMPSON & KNIGHT
1722 ROUTH STREET
Dallas, TX 75201-2532
214-969-1700 Main Phone

Report Legend:

-  - Shared Address
-  - Deceased
-  - Probable Current Address

Subject Information
(Best Information for Subject)

Name: M [redacted] F [redacted]
Date of Birth: [redacted]
Age: [redacted]
SSN: [redacted] issued in Illinois between [redacted]
[View All S](#)

AKAs
(Names Associated with Subject)

M [redacted] F [redacted]
Age: [redacted] SSN: [redacted]
Utility Locator - Connect Date: 4/30/2008

M [redacted] F [redacted]
Age: [redacted] SSN: [redacted]

M [redacted] F [redacted]
Age: [redacted] SSN: [redacted]

M [redacted] F [redacted]
Age: [redacted] SSN: [redacted]

Indicators

Bankruptcy: No
Property: Yes
Corporate Affiliations: No

Others Associated With Subjects SSN:

(DOES NOT usually indicate any type of fraud or deception)

[Redacted list of associated individuals]

Address Summary: [View All Address Variation Sources](#)

[redacted] KOKOMO, IN 46902-8108, HOWARD COUNTY (Apr 2003 - May 2019)
Utility Locator - Connect Date: 4/30/2008

[redacted] LAWRENCEVILLE, IL 62439-9802, LAWRENCE COUNTY (2007 - 2017)
[redacted] KOKOMO, IN 46901-3434, HOWARD COUNTY (Apr 1986 - 2009)
[redacted] KOKOMO, IN 46901-3454, HOWARD COUNTY (Mar 2007 - Sep 2007)
[redacted] KOKOMO, IN 46901-3454, HOWARD COUNTY (Mar 2007 - May 2007)

Active Address(es): [View All Address Variation Sources](#)

[None Found]

Previous And Non-Verified Address(es): [View All Address Variation Sources](#)

[REDACTED] KOKOMO, IN 46902-8108, HOWARD COUNTY (Apr 2003 - May 2019)

Utility Locator - Connect Date: 4/30/2008

Name Associated with Address:

M [REDACTED] P [REDACTED]

Current Residents at Address:

M [REDACTED] P [REDACTED]

[REDACTED]

Property Ownership Information for this Address

Property:

Parcel Number - [REDACTED]

Owner Name: M [REDACTED] P [REDACTED]

Owner Name 2: [REDACTED]

Property Address: - [REDACTED] KOKOMO, IN 46902-8108, HOWARD

COUNTY

Sale Date - [REDACTED]

Subdivision Name - [REDACTED]

Total Market Value - [REDACTED]

Assessed Value - [REDACTED]

Land Value - [REDACTED]

Improvement Value - [REDACTED]

Land Size - [REDACTED] Square Feet

Year Built - [REDACTED]

Legal Description - [REDACTED]

Data Source - [REDACTED]

Neighborhood Profile (2010 Census)

Average Age: [REDACTED]

Median Household Income: [REDACTED]

Median Owner Occupied Home Value: [REDACTED]

Average Years of Education: [REDACTED]

[REDACTED] LAWRENCEVILLE, IL 62439-9802, LAWRENCE COUNTY (2007 - 2017)

Name Associated with Address:

M [REDACTED] P [REDACTED]

Property Ownership Information for this Address

Property:

Parcel Number - [REDACTED]

Owner Name: [REDACTED]

Owner Name 2: [REDACTED]

Other Owners: [REDACTED]

Property Address: - [REDACTED] LAWRENCEVILLE, IL 62439-9802, LAWRENCE COUNTY

Assessed Value - [REDACTED]

Land Size - [REDACTED]

Legal Description - [REDACTED]

[REDACTED]

Data Source - [REDACTED]

[REDACTED] KOKOMO, IN 46901-3434, HOWARD COUNTY (Apr 1986 - 2009)

Name Associated with Address:

M [REDACTED] P [REDACTED]

[REDACTED]

Property Ownership Information for this Address

Property:

Parcel Number - [REDACTED]

Owner Name: [REDACTED]

Owner Name 2: [REDACTED]

Property Address: - [REDACTED] KOKOMO, IN 46901-3434, HOWARD

COUNTY

Owner Address: [REDACTED] KOKOMO, IN 46901-3422, HOWARD

COUNTY

Total Market Value - [REDACTED]

Assessed Value - [REDACTED]

Land Value - [REDACTED]

Improvement Value - [REDACTED]

Land Size - [REDACTED]

Year Built - [REDACTED]

Legal Description - [REDACTED]

Data Source - [REDACTED]

Neighborhood Profile (2010 Census)

Average Age: [REDACTED]
Median Household Income: [REDACTED]
Median Owner Occupied Home Value: [REDACTED]
Average Years of Education: [REDACTED]

[REDACTED] KOKOMO, IN 46901-3454, HOWARD COUNTY (Mar 2007 - Sep 2007)

Name Associated with Address:

M [REDACTED] P [REDACTED]

Current Residents at Address:

[REDACTED]

Property Ownership Information for this Address

Property:

Parcel Number - [REDACTED]
Owner Name: [REDACTED]
Property Address: - [REDACTED] KOKOMO, IN 46901-3454, HOWARD COUNTY
Owner Address: [REDACTED] KOKOMO, IN 46901-3454, HOWARD COUNTY
Subdivision Name - [REDACTED]
Assessed Value - [REDACTED]
Land Size - [REDACTED]
Year Built - [REDACTED]
Legal Description - [REDACTED]
Data Source - [REDACTED]

Neighborhood Profile (2010 Census)

Average Age: [REDACTED]
Median Household Income: [REDACTED]
Median Owner Occupied Home Value: [REDACTED]
Average Years of Education: [REDACTED]

[REDACTED] KOKOMO, IN 46901-3454, HOWARD COUNTY (Mar 2007 - May 2007)

Name Associated with Address:

M [REDACTED] P [REDACTED]

Current Residents at Address:

[REDACTED]

Neighborhood Profile (2010 Census)

Average Age: [REDACTED]
Median Household Income: [REDACTED]
Median Owner Occupied Home Value: [REDACTED]
Average Years of Education: [REDACTED]

Bankruptcies:

[None Found]

UCC Filings:

[None Found]

Phones Plus:

Phones Plus1

Name: M [REDACTED] P [REDACTED]
Address: [REDACTED] LAWRENCEVILLE, IL 62439-9802
Phone Number: [REDACTED] - EDT
Carrier: AMERITECH INDIANA - (KOKOMO, IN)

Phones Plus2

Name: M [REDACTED] P [REDACTED]
Address: [REDACTED] KOKOMO, IN 46902-8108
Phone Number: [REDACTED] - EDT
Carrier: AMERITECH INDIANA - (KOKOMO, IN)

Phones Plus3

Name: M [REDACTED] P [REDACTED]
Address: [REDACTED] KOKOMO, IN 46902-8108
Phone Number: [REDACTED] - EDT
Phone Type: Mobile
Carrier: NEW CINGULAR WRLS IL - (KOKOMO, IN)

People at Work:

Maximum 50 People at Work records returned

Name: M [REDACTED] F [REDACTED]
SSN: [REDACTED]
Company: [REDACTED]
Address: [REDACTED] KOKOMO, IN 46901-4622
Phone: [REDACTED]
FEIN: [REDACTED]
Dates: [REDACTED]

Driver's License Information:

[None Found]

Possible Properties Owned by Subject:

Property:

Parcel Number - [REDACTED]
Owner Name: M [REDACTED] F [REDACTED]
Owner Name 2: [REDACTED]
Property Address: - [REDACTED] KOKOMO, IN 46902-8108, HOWARD COUNTY
Sale Date - [REDACTED]
Subdivision Name - [REDACTED]
Total Market Value - [REDACTED]
Assessed Value - [REDACTED]
Land Value - [REDACTED]
Improvement Value - [REDACTED]
Land Size - [REDACTED]
Year Built - [REDACTED]
Legal Description - [REDACTED]
Data Source - [REDACTED]

Property:

Parcel Number - [REDACTED]
Book - [REDACTED]
Page - [REDACTED]
Owner Name: M [REDACTED] F [REDACTED]
Property Address: - [REDACTED] LAWRENCEVILLE, IL 62439-9802, LAWRENCE COUNTY
Sale Date - [REDACTED]
Land Usage - [REDACTED]
Assessed Value - [REDACTED]
Land Size - [REDACTED]
Legal Description - [REDACTED]

Data Source - [REDACTED]

Property:

Parcel Number - [REDACTED]
Owner Name: M [REDACTED] F [REDACTED]
Owner Name 2: [REDACTED]
Property Address: - [REDACTED] KOKOMO, IN 46902-8108, HOWARD COUNTY
Seller Name: [REDACTED]
Data Source - [REDACTED]

Property:

Parcel Number - [REDACTED]
Owner Name: M [REDACTED] F [REDACTED]
Owner Name 2: [REDACTED]
Property Address: - [REDACTED] KOKOMO, IN 46901-3434, HOWARD COUNTY
Owner Address: [REDACTED] KOKOMO, IN 46901-3434, HOWARD COUNTY
Assessed Value - [REDACTED]
Year Built - [REDACTED]
Legal Description - [REDACTED]
Data Source - [REDACTED]

Motor Vehicles Registered To Subject:

Vehicle:

Description: [REDACTED]
 VIN: [REDACTED]
 State Of Origin: INDIANA
 Engine: 6 Cylinder 220 Cubic Inch
 Anti Lock Brakes: 4 wheel standard
 Air Conditioning: Standard
 Daytime Running Lights: Optional
 Power Steering: Standard
 Power Brakes: Standard
 Power Windows: Standard
 Security System: Passive Immobilize Key, Keyless entry, and alarm
 Roof: None / not available
 Price: [REDACTED]
 Radio: AM/FM CD/MP3
 Front Wheel Drive: Yes
 Four Wheel Drive: No
 Tilt Wheel: Standard
 Data Source: Non-Governmental
 Source Date First Seen: [REDACTED]
 Source Date Last Seen: [REDACTED]

Owner(s)

Name: M [REDACTED] F [REDACTED]
 Address: [REDACTED] KOKOMO, IN 46902-8108, HOWARD COUNTY
 DOB: [REDACTED]
 Sex: [REDACTED]
 Age: [REDACTED]

Lien Holder(s)
 None

Watercraft:

[None Found]

FAA Certifications:

[None Found]

FAA Aircrafts:

[None Found]

Possible Criminal Records:

[None Found]

Sexual Offenses:

[None Found]

Florida Accidents:

[None Found]

Professional License(s):

Professional License 1

Name: M [REDACTED] F [REDACTED]
 License Address: [REDACTED] KOKOMO, IN 46902-8108, HOWARD COUNTY
 License State: Indiana
 License Number: [REDACTED]
 License Type: REGISTERED NURSE
 Profession/Board: NURSING BOARD
 License Status: ACTIVE
 Issue Date: [REDACTED]
 Expiration Date: [REDACTED]

Professional License 2

Name: M [REDACTED] F [REDACTED]
 License Address: [REDACTED] KOKOMO, IN 46902-8108, HOWARD COUNTY

License State: Indiana
License Number: [REDACTED]
License Type: REGISTERED NURSE
Profession/Board: NURSING BOARD
License Status: ACTIVE
Issue Date: [REDACTED]
Expiration Date: [REDACTED]

Professional License 3
Name: M [REDACTED] F [REDACTED]
License Address: [REDACTED] KOKOMO, IN 46902-8108, HOWARD COUNTY
License State: Indiana
License Number: [REDACTED]
License Type: REGISTERED NURSE
Profession/Board: NURSING BOARD
License Status: ACTIVE
Issue Date: [REDACTED]
Expiration Date: [REDACTED]

Professional License 4
Name: M [REDACTED] F [REDACTED]

License State: Indiana
License Number: [REDACTED]
License Type: REGISTERED NURSE
Profession/Board: NURSING
License Status: ACTIVE
Issue Date: [REDACTED]
Expiration Date: [REDACTED]

Professional License 5
Name: M [REDACTED] F [REDACTED]
License Address: [REDACTED] KOKOMO, IN 46902-8108, HOWARD COUNTY
License State: Indiana
License Number: [REDACTED]
License Type: NURSE REGISTERED (RN)
License Status: CURRENT
Issue Date: [REDACTED]

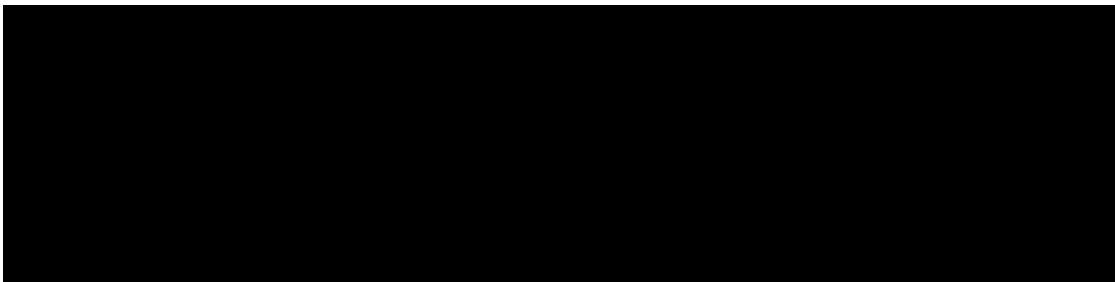
Professional License 6
Name: M [REDACTED] F [REDACTED]
License Address: KOKOMO, IN
License State: Indiana
License Number: [REDACTED]
License Type: REGISTERED NURSE
Profession/Board: STATE BOARD OF NURSING
License Status: ACTIVE

Voter Registration:
[None Found]

Hunting/Fishing Permit:
[None Found]

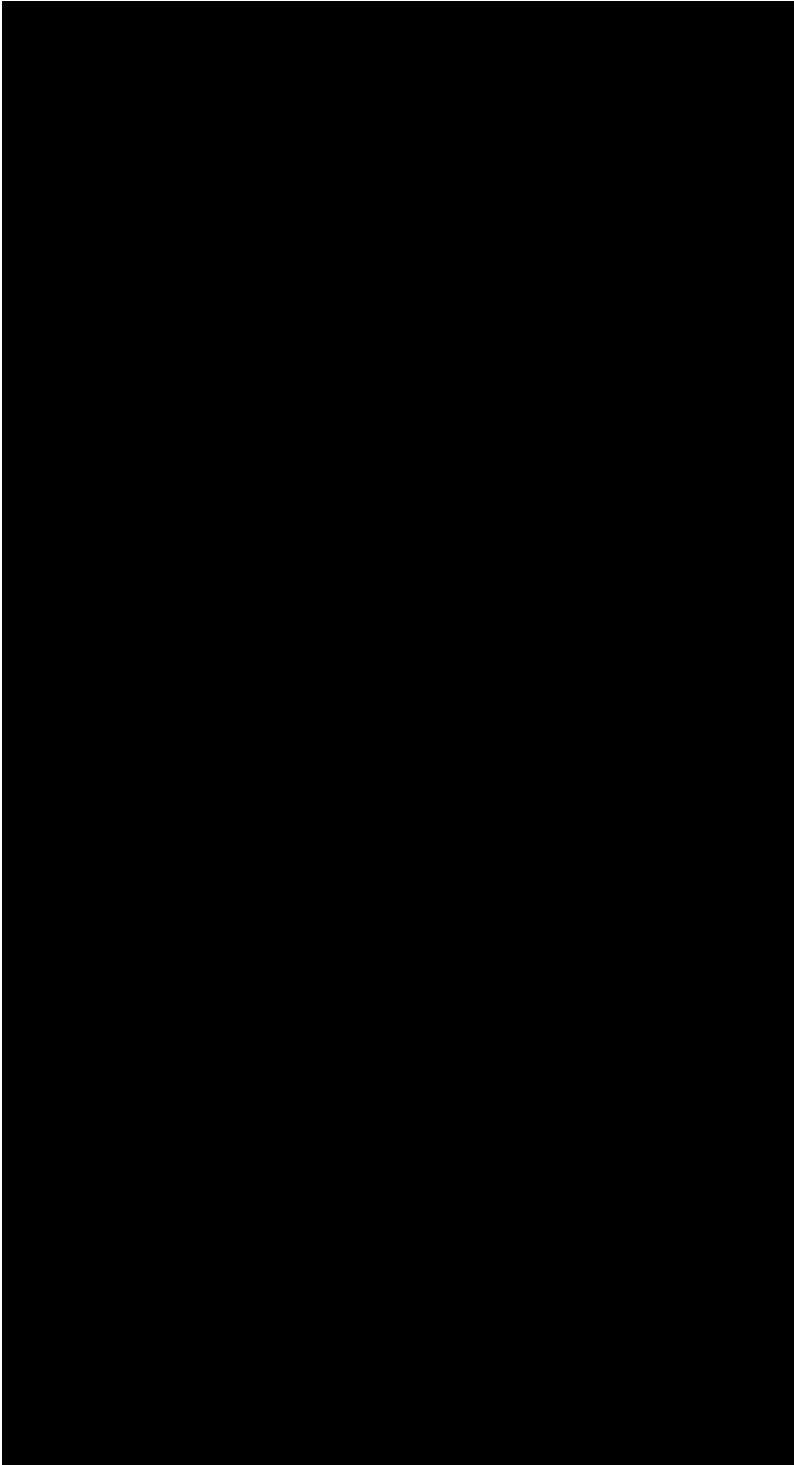
Concealed Weapons Permit:
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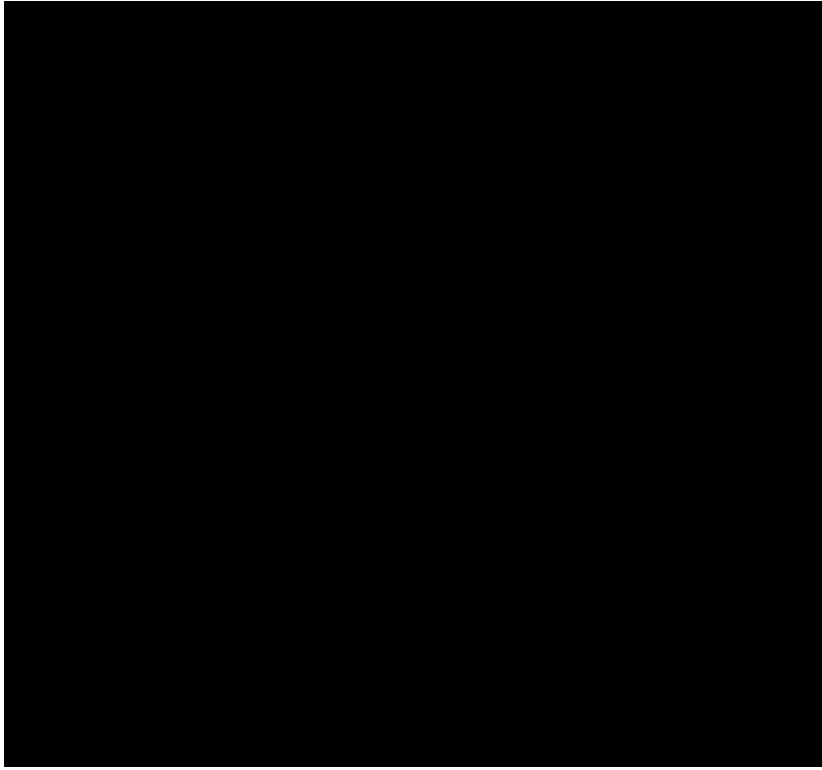
Possible Associates:



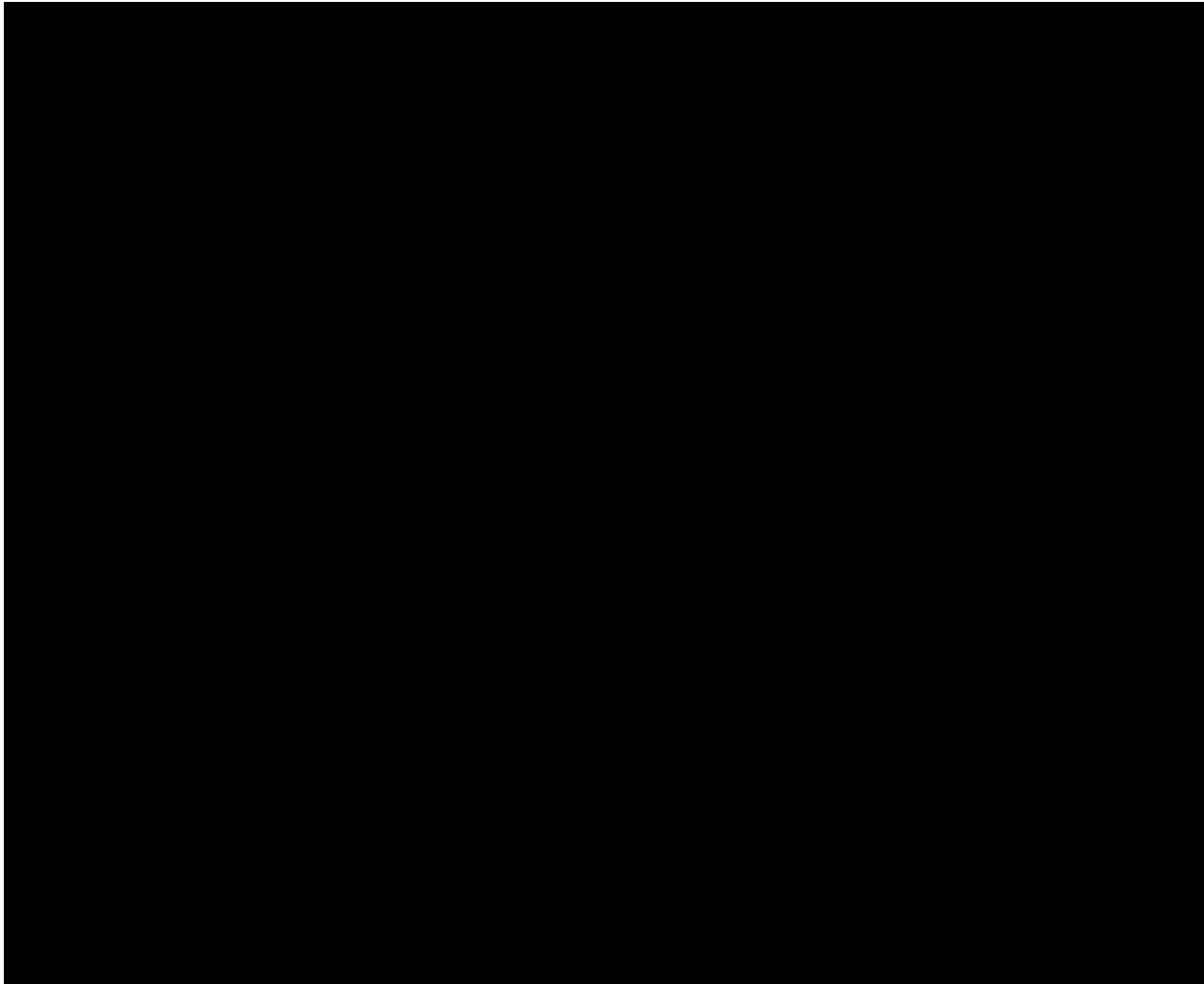


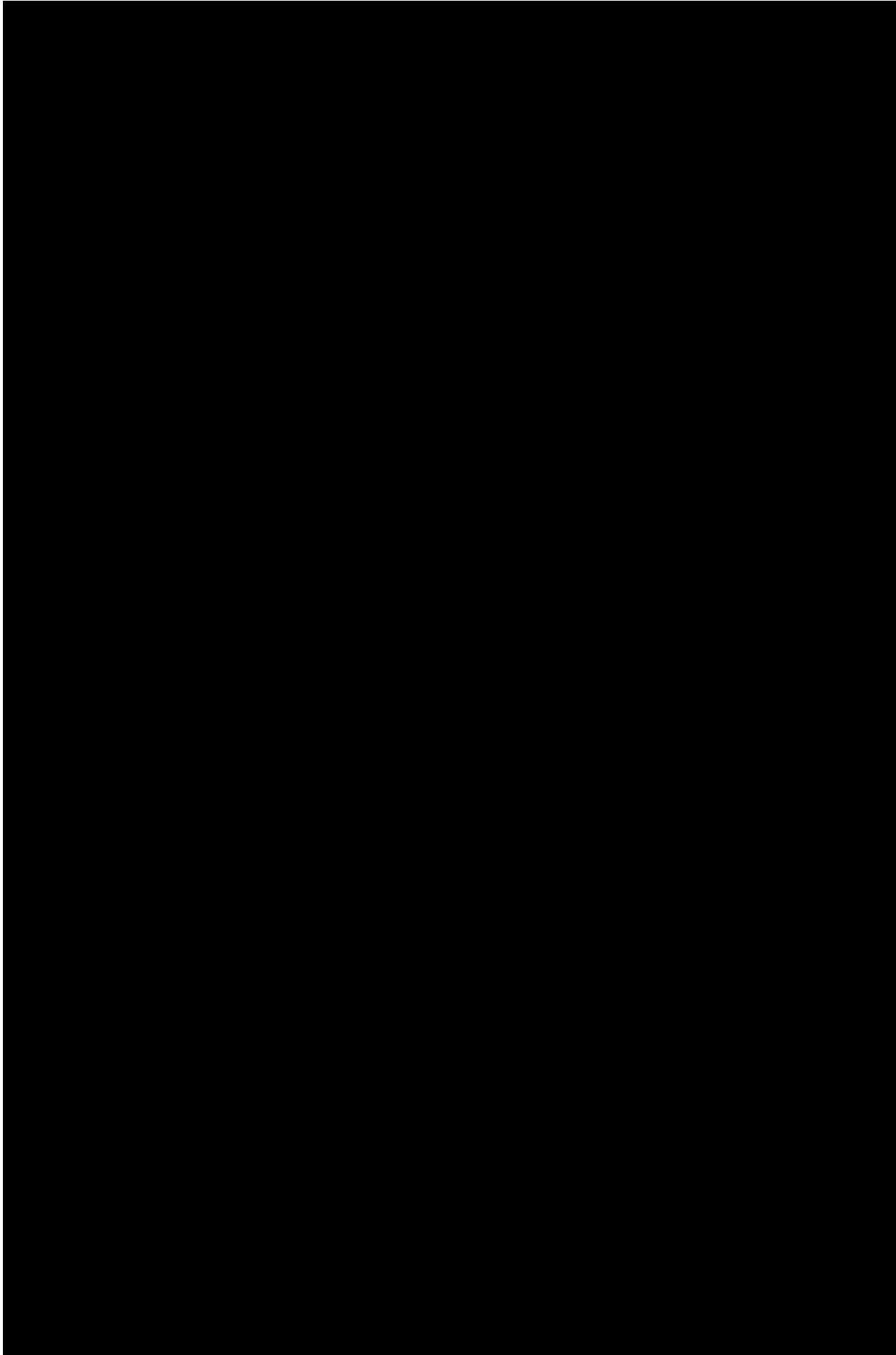
Possible Relative Summary: *(Click on name to link to more details within this report - No Charge)*

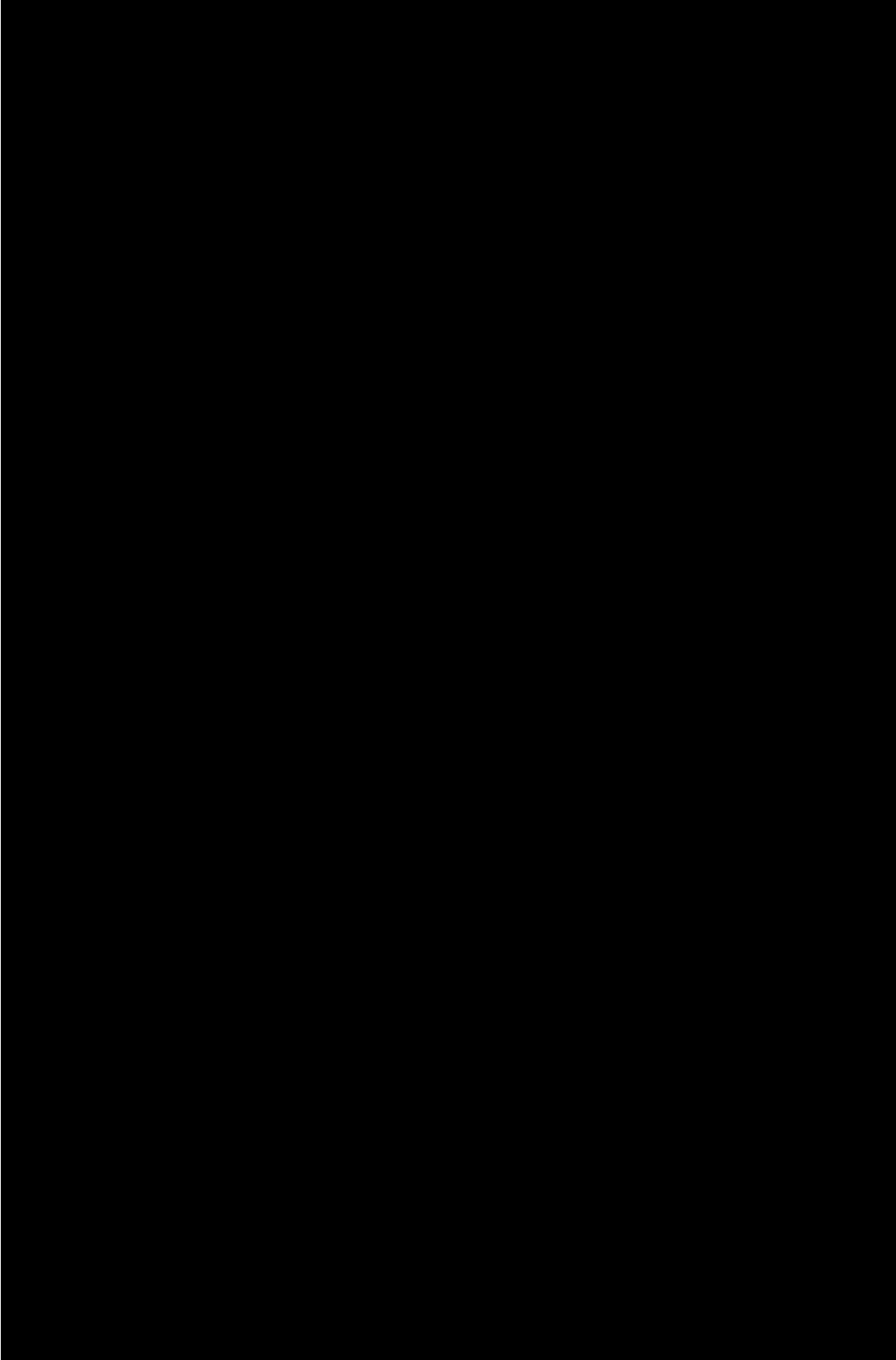


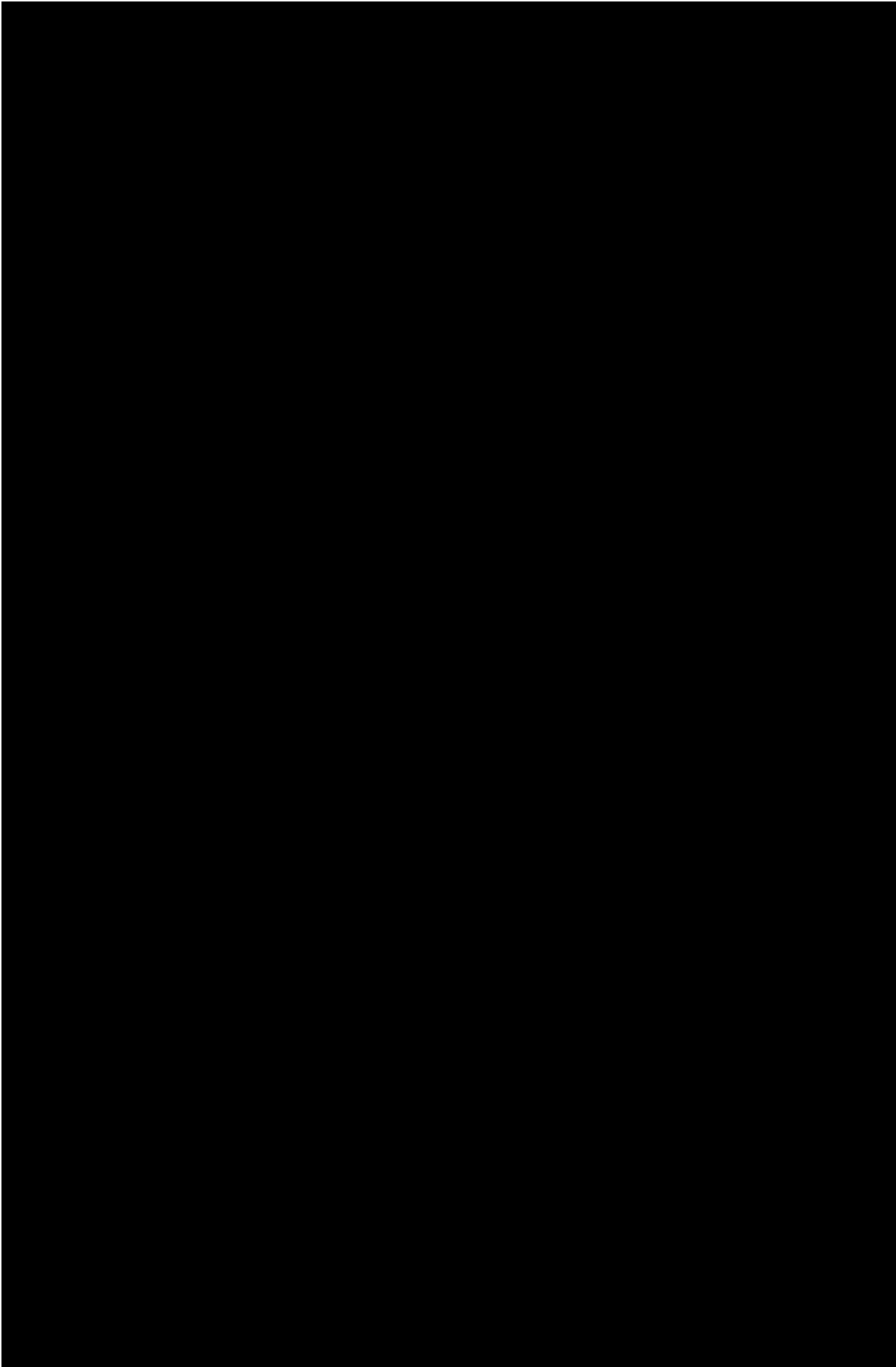


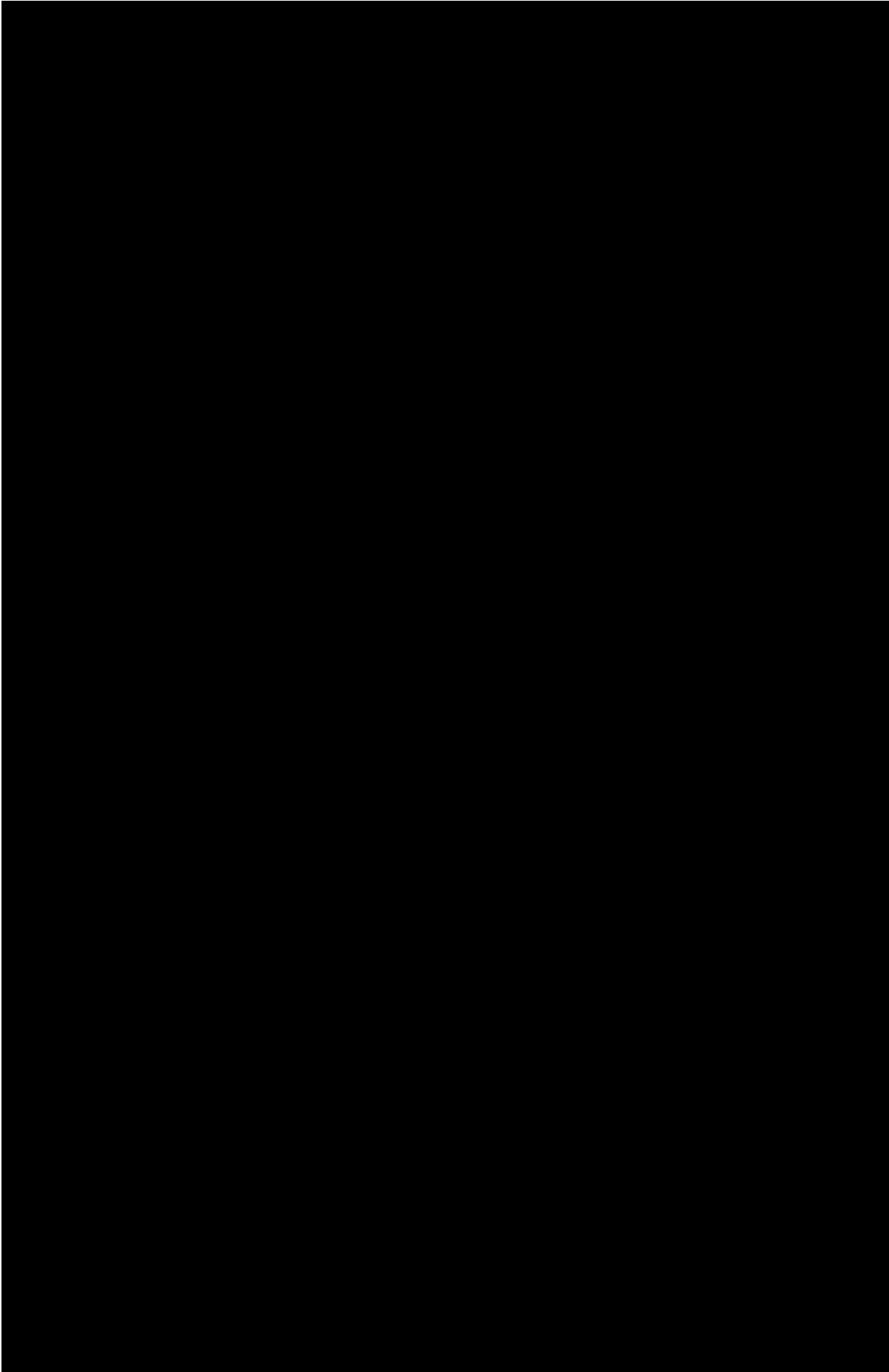
Possible Relatives:

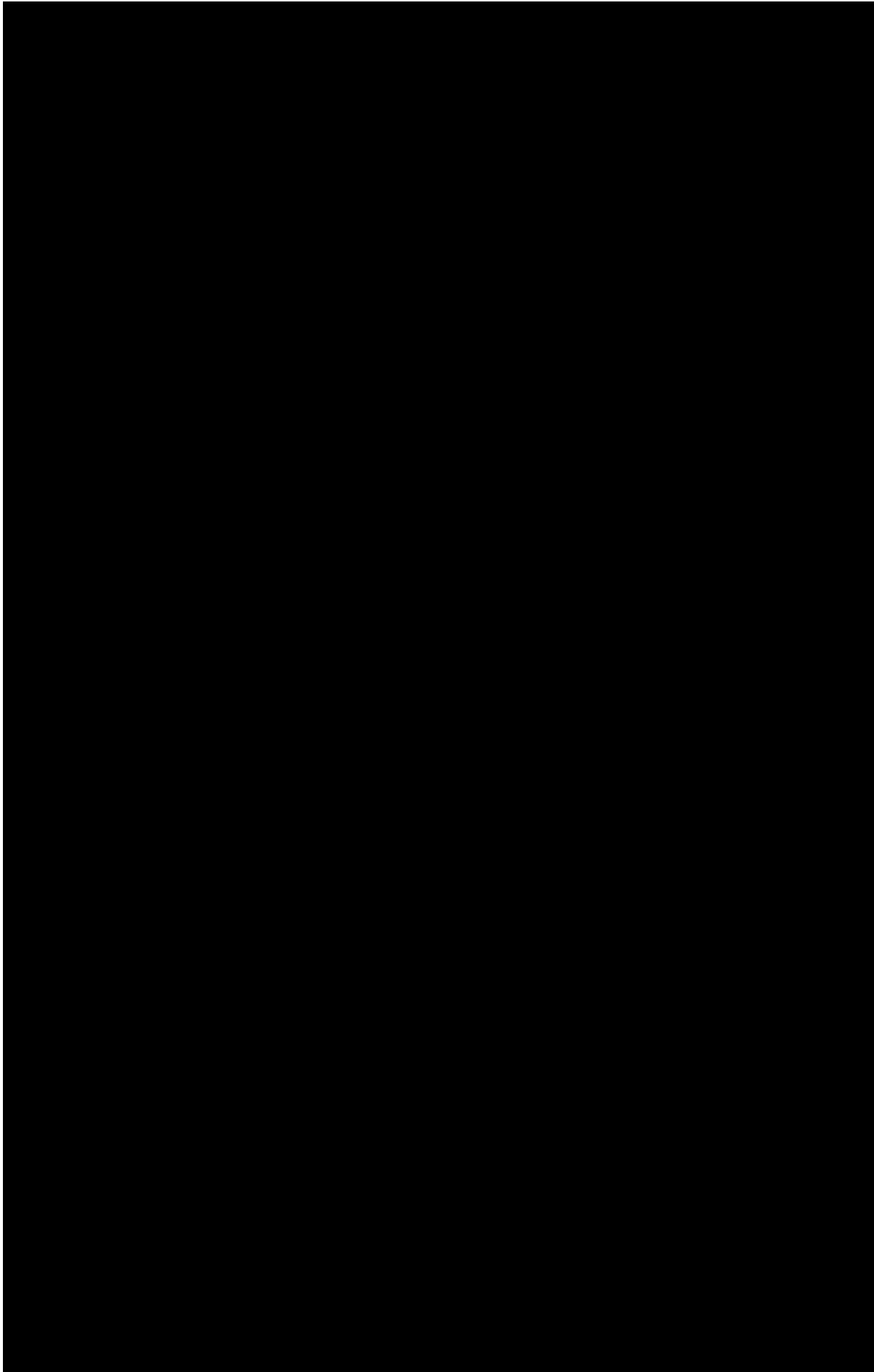


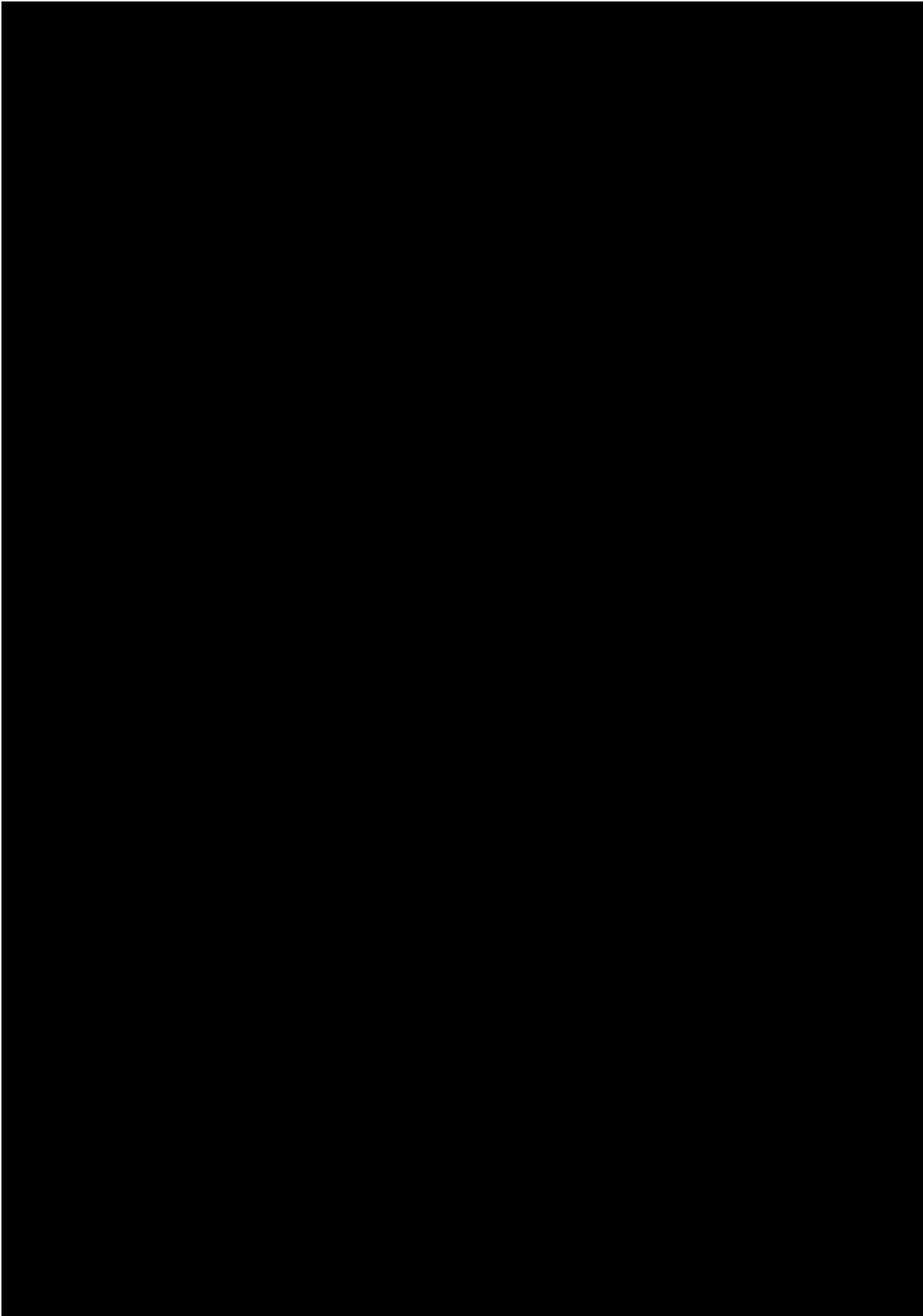


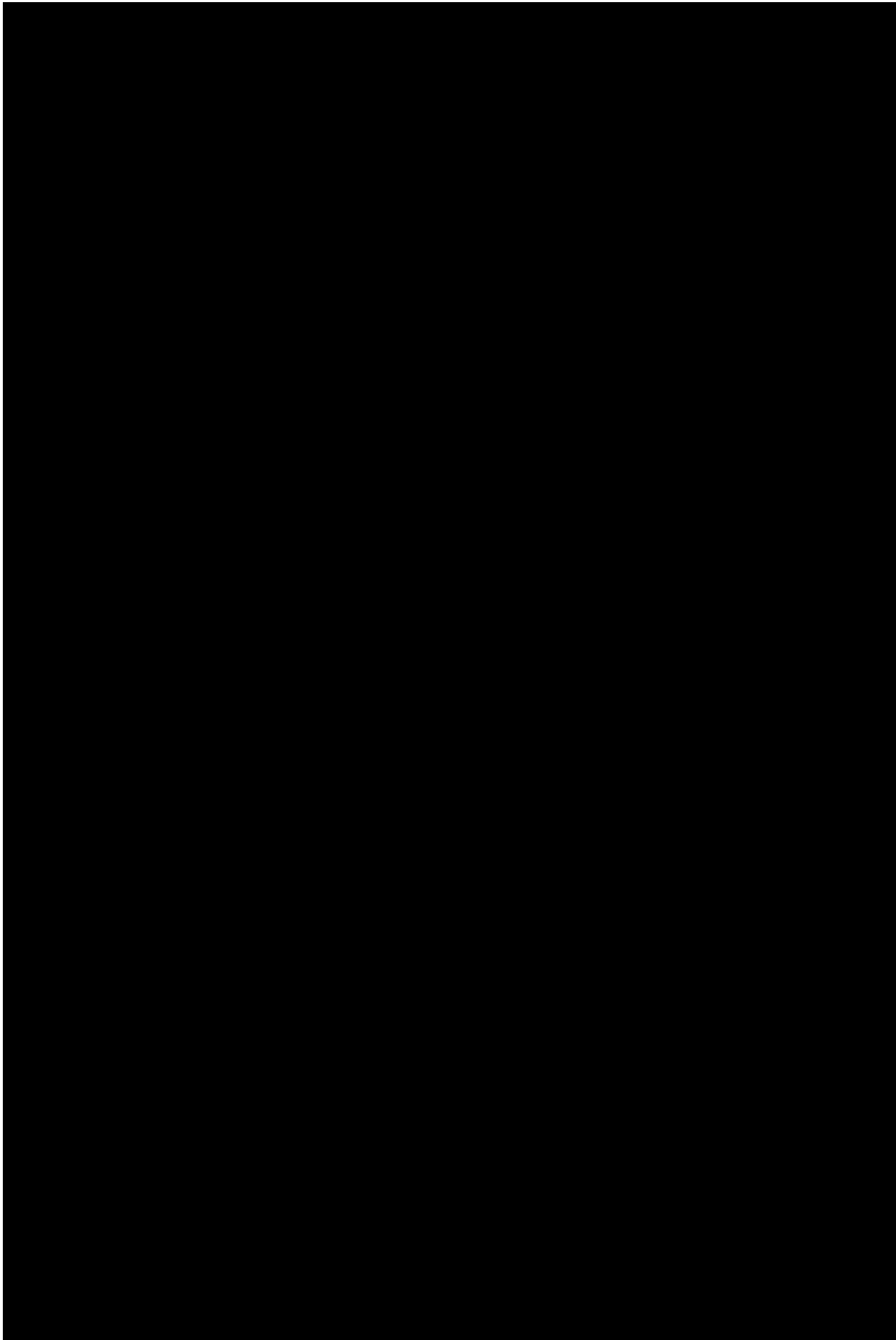


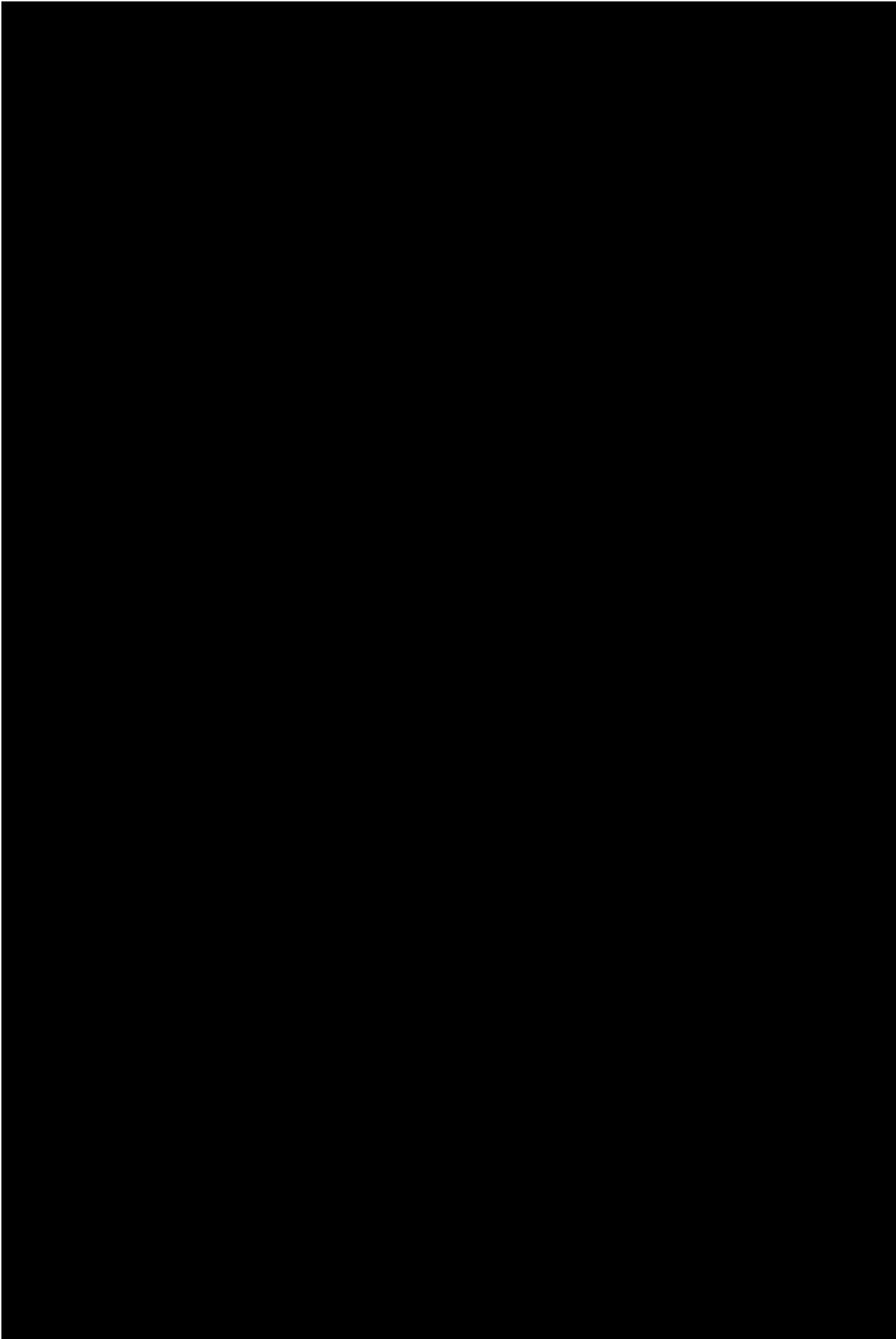


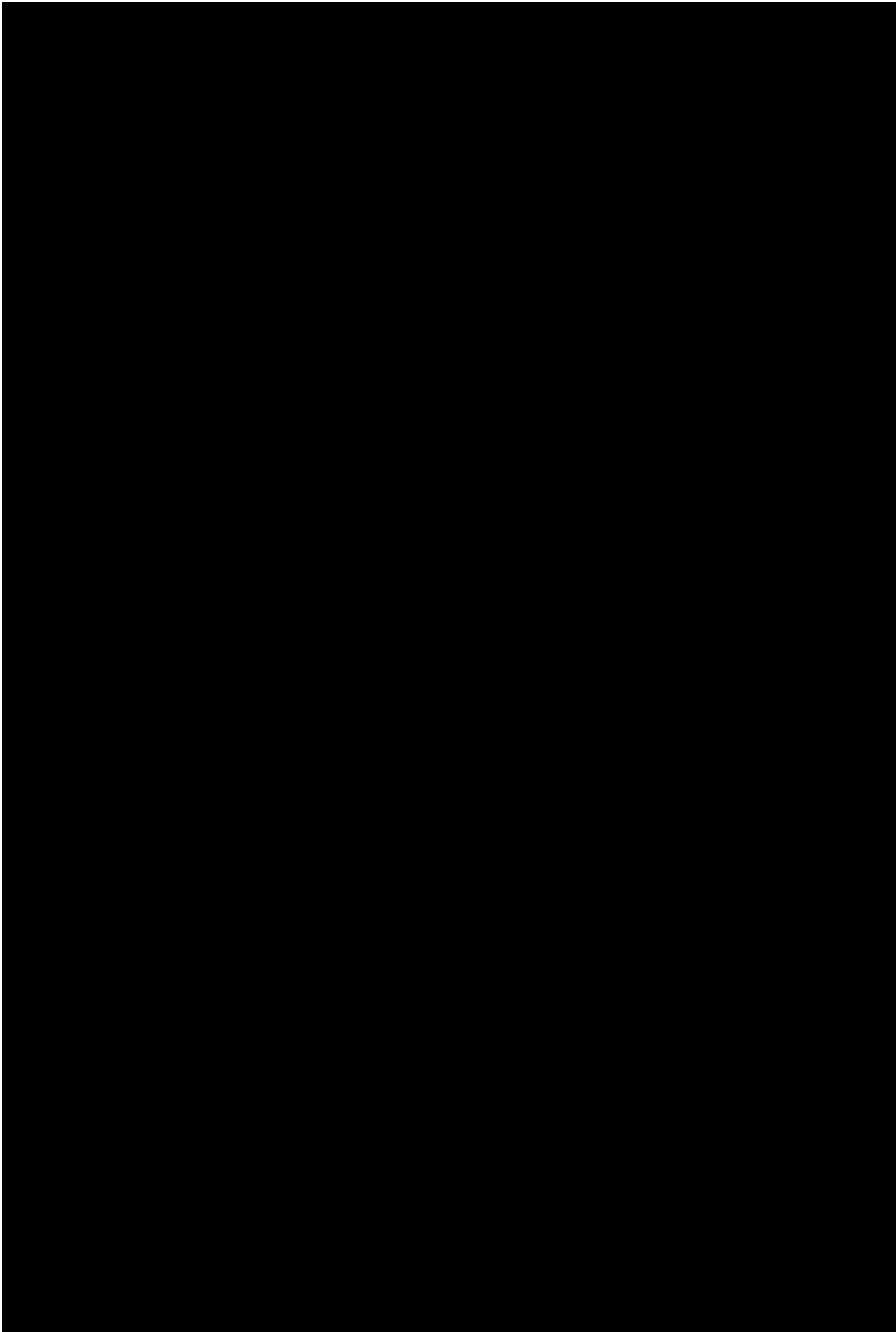


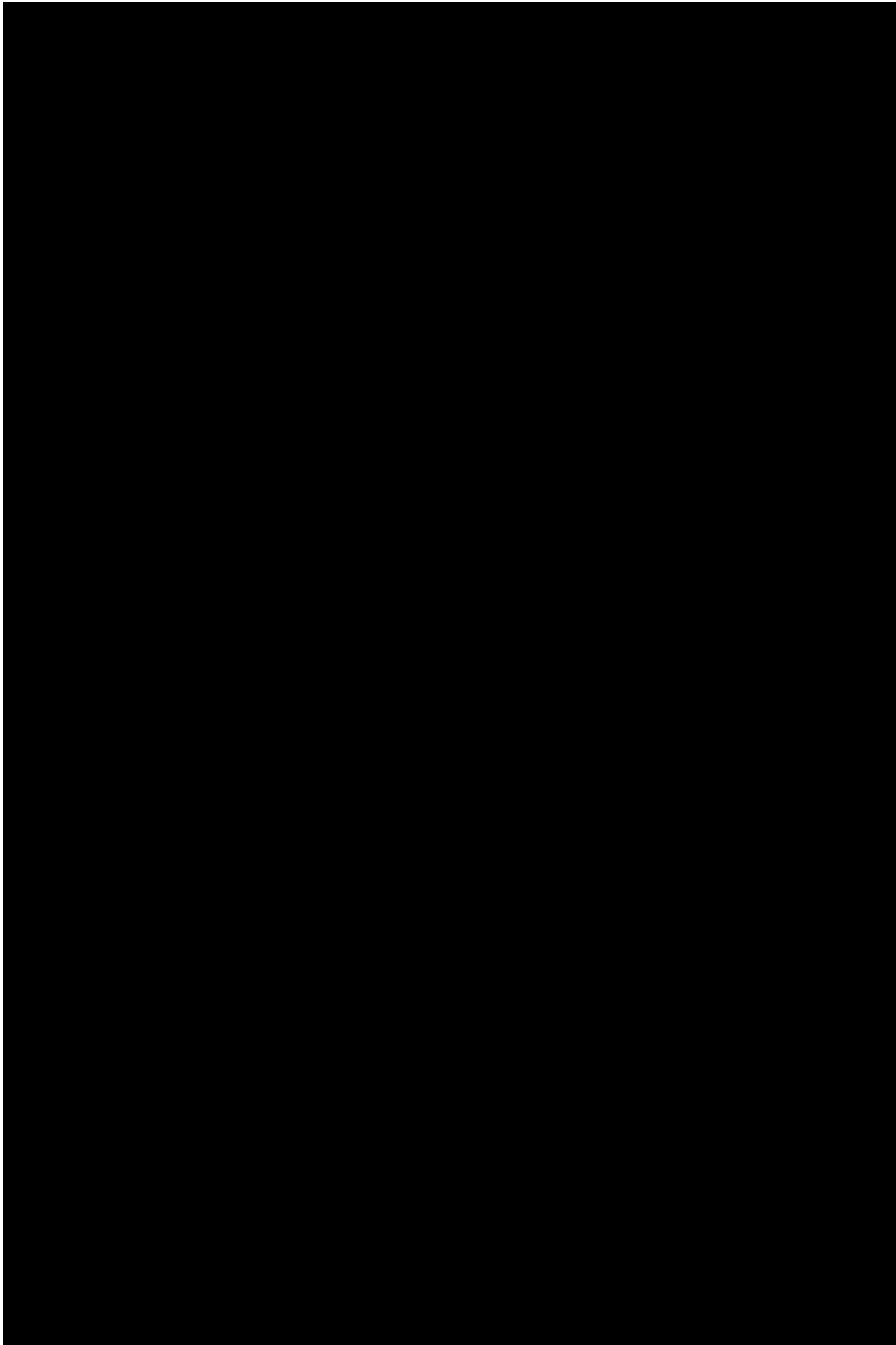


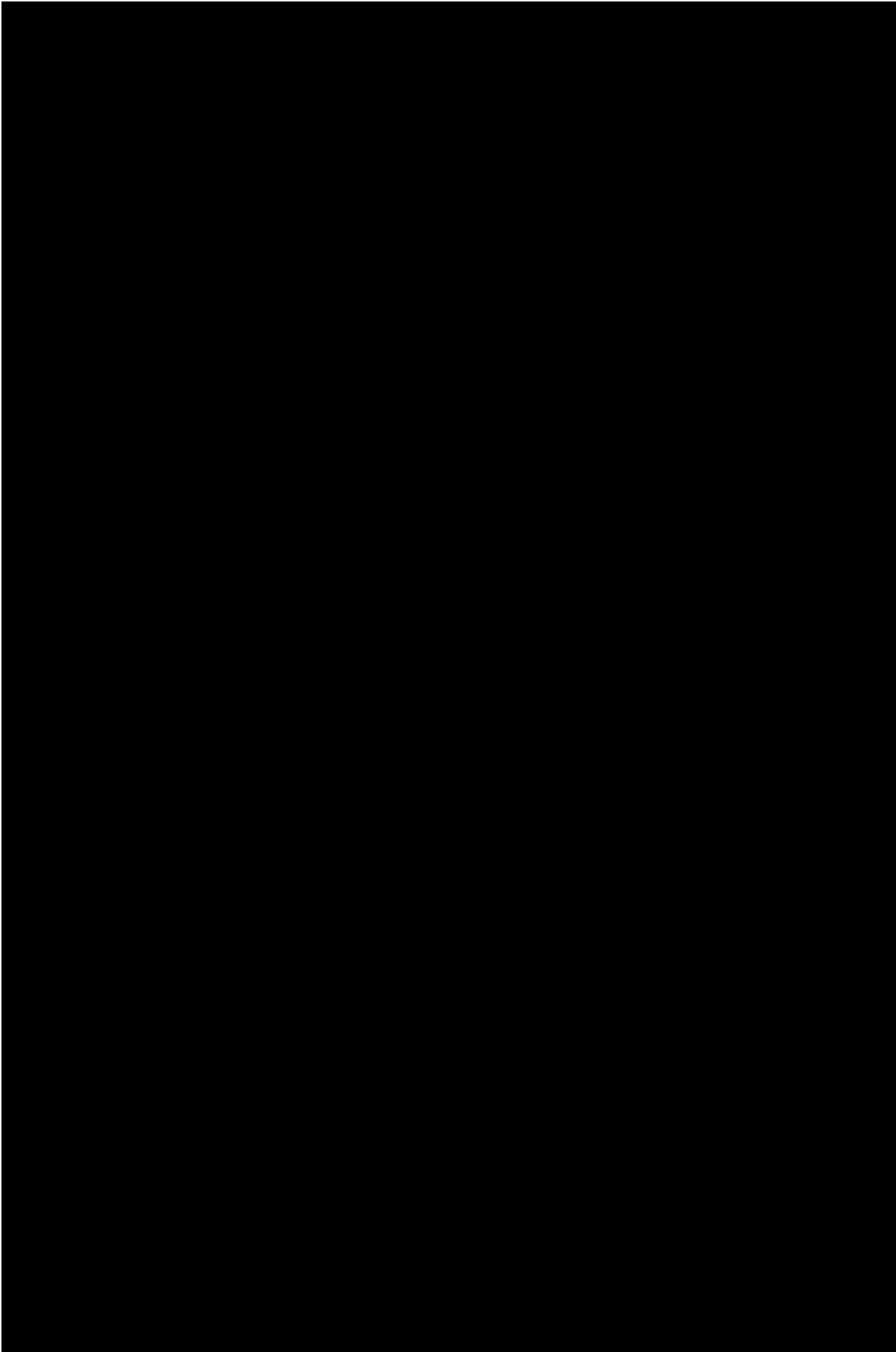


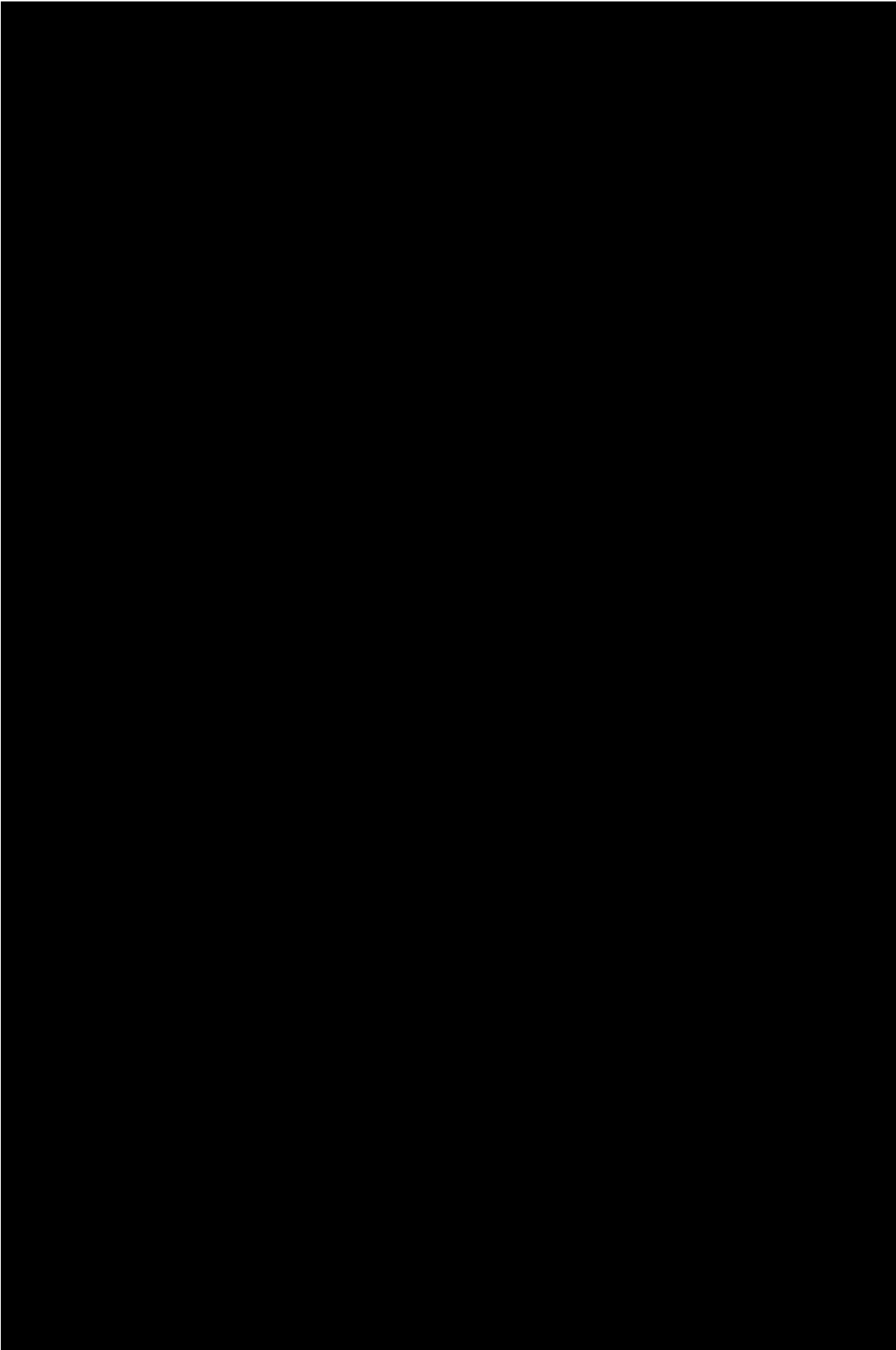














Neighbors:

Neighborhood:

[Redacted] KOKOMO, IN 46902-8108, HOWARD COUNTY
(Apr 2003 - May 2019)

Residents:

M [Redacted] P [Redacted] DOB: [Redacted]
[Redacted] issued in Illinois between [Redacted]

D [Redacted]
[Redacted]
[Redacted]

Address(es):

[Redacted] KOKOMO, IN 46902-8109, HOWARD COUNTY
(Aug 2002 - Mar 2019)

Residents:

[Redacted]
[Redacted]
[Redacted]



[Redacted] KOKOMO, IN 46902-8108, HOWARD COUNTY
(Apr 2003 - Mar 2019)

Residents:

[Redacted]
[Redacted]
[Redacted]



[Redacted] KOKOMO, IN 46902-8108, HOWARD COUNTY
(Apr 2003 - Mar 2019)

Residents:

[Redacted]
[Redacted]
[Redacted]

[Redacted] KOKOMO, IN 46902-8109, HOWARD COUNTY
(Apr 2003 - Mar 2019)

Residents:

[Redacted]
[Redacted]
[Redacted]

[Redacted]
[Redacted]

[Redacted]

EXHIBIT C

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Your DPPA Permissible Use: Civil, Criminal, Administrative, or Arbitral Proceedings
Your GLBA Permissible Use: Legal Compliance
Your DMF Permissible Use: Legitimate Business Purpose Pursuant to a Law, Government Rule, Regulation, or Fiduciary Duty

Comprehensive Report

Date: 06/07/19
Reference Code: [Redacted]

Report processed by:
THOMPSON & KNIGHT
1722 ROUTH STREET
Dallas, TX 75201-2532
214-969-1700 Main Phone

Report Legend:
 - Shared Address
 - Deceased
 - Probable Current Address

Subject Information
(Best Information)
Name: [Redacted]
Date of Birth: [Redacted]
Age: [Redacted]
SSN: [Redacted] issued in [Redacted] iana
Connect Date: 10/12/2013

AKAs
(N s cja Subject)
[Redacted]
[Redacted]
[Redacted]
[Redacted]

Indicators
Bankruptcy: No
Property: No
Corporate Affiliations: No

Others Associated With Subjects SSN:

(DOES NOT usually indicate any type of fraud or deception)

Address Summary: [View All Address Variation Sources](#)

[Redacted] NEW ORLEANS, LA 70122-1522, ORLEANS COUNTY (Feb 2011 - May 2019)
[Redacted] NEW ORLEANS, LA 70123-6232, JEFFERSON COUNTY (Oct 2013 - Apr 2018)

Utility Locator - Connect Date: 10/12/2013

- [Redacted] GRETNA, LA 70053-6657, JEFFERSON COUNTY (Feb 2011 - Nov 2016)
- [Redacted] EDGARD, LA 70049-2619, ST. JOHN BAPTIST COUNTY (Jul 2002 - Apr 2016)
- [Redacted] NEW ORLEANS, LA 70117-4612, ORLEANS COUNTY (Aug 2009 - Jan 2015)
- [Redacted] METAIRIE, LA 70001-1837, JEFFERSON COUNTY (Aug 2008 - Jun 2014)
- [Redacted] KENNER, LA 70063-2757, JEFFERSON COUNTY (Apr 2008 - Feb 2009)
- [Redacted] NEW ORLEANS, LA 70127-1448, ORLEANS COUNTY (May 2006 - Nov 2008)
- [Redacted] EDGARD, LA 70049-2619, ST. JOHN BAPTIST COUNTY (Jul 2002 - Nov 2008)
- [Redacted] PORT SULPHUR, LA 70083-2833, PLAQUEMINES COUNTY (May 2006)
- [Redacted] NEW ORLEANS, LA 70122-3520, ORLEANS COUNTY (Apr 2006)
- [Redacted] BAKER, LA 70714-4805, EAST BATON ROUGE COUNTY (Oct 2005 - Apr 2006)

Active Address(es): [View All Address Variation Sources](#)

[None Found]

Previous And Non-Verified Address(es): [View All Address Variation Sources](#)

[Redacted] NEW ORLEANS, LA 70122-1522, ORLEANS COUNTY (Feb 2011 - May 2019)

Name Associated with Address:

[Redacted]

Current Residents at Address:

[Redacted]

Neighborhood Profile (2010 Census)

Average Age: [Redacted]
Median Household Income: [Redacted]
Median Owner Occupied Home Value: [Redacted]
Average Years of Education: [Redacted]

[Redacted] NEW ORLEANS, LA 70123-6232, JEFFERSON COUNTY

(Oct 2013 - Apr 2018)

Utility Locator - Connect Date: 10/12/2013

Name Associated with Address:

[Redacted]

Property Ownership Information for this Address

Property:

Parcel Number - [REDACTED]
Book - [REDACTED]
Page - [REDACTED]
Owner Name: [REDACTED]
Property Address: - [REDACTED] RIVER RIDGE, LA 70123-6212, JEFFERSON

COUNTY

Land Usage - [REDACTED]
Subdivision Name - [REDACTED]
Total Market Value - [REDACTED]
Assessed Value - [REDACTED]
Land Value - [REDACTED]
Improvement Value - [REDACTED]
Land Size - [REDACTED]
Legal Description - [REDACTED]
Data Source - [REDACTED]

Neighborhood Profile (2010 Census)

Average Age: [REDACTED]
Median Household Income: [REDACTED]
Median Owner Occupied Home Value: [REDACTED]
Average Years of Education: [REDACTED]
[REDACTED] GRETNA, LA 70053-6657, JEFFERSON COUNTY (Feb 2011 - Nov 2016)

Name Associated with Address:

T [REDACTED] C [REDACTED]

Property Ownership Information for this Address

Property:

Parcel Number - [REDACTED]
Owner Name: [REDACTED]
Property Address: - [REDACTED] GRETNA, LA 70053-6623, JEFFERSON COUNTY
Subdivision Name - [REDACTED]
Total Market Value - [REDACTED]
Assessed Value - [REDACTED]
Land Value - [REDACTED]
Land Size - [REDACTED]
Legal Description - [REDACTED]
Data Source - [REDACTED]

Neighborhood Profile (2010 Census)

Average Age: [REDACTED]
Median Household Income: [REDACTED]
Median Owner Occupied Home Value: [REDACTED]
Average Years of Education: [REDACTED]
[REDACTED] EDGARD, LA 70049-2619, ST. JOHN BAPTIST COUNTY (Jul 2002 - Apr 2016)

Name Associated with Address:

T [REDACTED] C [REDACTED]

Current Residents at Address:

[REDACTED]

Property Ownership Information for this Address

Property:

Parcel Number - [REDACTED]
Owner Name: [REDACTED]
Property Address: - [REDACTED] EDGARD, LA 70049-2619, ST. JOHN BAPTIST COUNTY
Subdivision Name - [REDACTED]
Total Market Value - [REDACTED]
Assessed Value - [REDACTED]
Land Value - [REDACTED]
Improvement Value - [REDACTED]
Legal Description - [REDACTED]
Data Source - [REDACTED]

Neighborhood Profile (2010 Census)

Average Age: [REDACTED]
Median Household Income: [REDACTED]
Median Owner Occupied Home Value: [REDACTED]
Average Years of Education: [REDACTED]
[REDACTED] NEW ORLEANS, LA 70117-4612, ORLEANS COUNTY (Aug 2009 - Jan 2015)

Name Associated with Address:

T [REDACTED] C [REDACTED]

Current Residents at Address:

[REDACTED]

Property Ownership Information for this Address

Property:

Parcel Number - [REDACTED]
Book - [REDACTED]
Page - [REDACTED]
Owner Name: [REDACTED]
Property Address: - [REDACTED] NEW ORLEANS, LA 70117-4612, ORLEANS COUNTY
Sale Date - [REDACTED]
Sale Price - [REDACTED]

Land Usage - [REDACTED]
Total Market Value - [REDACTED]
Assessed Value - [REDACTED]
Land Value - [REDACTED]
Improvement Value - [REDACTED]
Land Size - [REDACTED] Square Feet
Legal Description - [REDACTED]
Data Source - [REDACTED]

Neighborhood Profile (2010 Census)

Average Age: [REDACTED]
Median Household Income: [REDACTED]
Median Owner Occupied Home Value: [REDACTED]
Average Years of Education: [REDACTED]

[REDACTED] METAIRIE, LA 70001-1837, JEFFERSON COUNTY (Aug 2008 - Jun 2014)

Name Associated with Address:

T [REDACTED] C [REDACTED]

Property Ownership Information for this Address

Property:

Parcel Number - [REDACTED]
Owner Name: [REDACTED]
Property Address: - [REDACTED] METAIRIE, LA 70001-1837, JEFFERSON COUNTY
Owner Address: [REDACTED]
Subdivision Name - [REDACTED]
Data Source - [REDACTED]

Neighborhood Profile (2010 Census)

Average Age: [REDACTED]
Median Household Income: [REDACTED]
Median Owner Occupied Home Value: [REDACTED]
Average Years of Education: [REDACTED]

[REDACTED] KENNER, LA 70063-2757, JEFFERSON COUNTY (Apr 2008 - Feb 2009)

Name Associated with Address:

T [REDACTED] C [REDACTED]

Neighborhood Profile (2010 Census)

Average Age: [REDACTED]
Median Household Income: [REDACTED]
Median Owner Occupied Home Value: [REDACTED]
Average Years of Education: [REDACTED]

[REDACTED] NEW ORLEANS, LA 70127-1448, ORLEANS COUNTY (May 2006 - Nov 2008)

Name Associated with Address:

T [REDACTED] C [REDACTED]

Current Residents at Address:

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Property Ownership Information for this Address

Property:

Parcel Number - [REDACTED]
Book - [REDACTED]
Page - [REDACTED]
Owner Name: [REDACTED]
Property Address: - [REDACTED] NEW ORLEANS, LA 70127-1448, ORLEANS COUNTY
Sale Date - [REDACTED]
Sale Price - [REDACTED]
Land Usage - [REDACTED]
Subdivision Name - [REDACTED]
Total Market Value - [REDACTED]
Assessed Value - [REDACTED]
Land Value - [REDACTED]
Improvement Value - [REDACTED]
Land Size - [REDACTED]
Legal Description - [REDACTED]
Data Source - [REDACTED]

Neighborhood Profile (2010 Census)

Average Age: [REDACTED]
Median Household Income: [REDACTED]
Median Owner Occupied Home Value: [REDACTED]
Average Years of Education: [REDACTED]

[REDACTED] EDGARD, LA 70049-2619, ST. JOHN BAPTIST COUNTY (Jul 2002 - Nov 2008)

Name Associated with Address:

T [REDACTED] C [REDACTED]

Property Ownership Information for this Address

Property:

Parcel Number - [REDACTED]
Owner Name: [REDACTED]
Property Address: - [REDACTED] EDGARD, LA 70049-2619, ST. JOHN BAPTIST COUNTY
Assessed Value - [REDACTED]
Legal Description - [REDACTED]

Data Source - [REDACTED]
Neighborhood Profile (2010 Census)

Average Age: [REDACTED]
Median Household Income: [REDACTED]
Median Owner Occupied Home Value: [REDACTED]
Average Years of Education: [REDACTED]

[REDACTED] PORT SULPHUR, LA 70083-2833, PLAQUEMINES COUNTY (May 2006)

Name Associated with Address:

Neighborhood Profile (2010 Census)

Average Age: [REDACTED]
Median Household Income: [REDACTED]
Median Owner Occupied Home Value: [REDACTED]
Average Years of Education: [REDACTED]

[REDACTED] NEW ORLEANS, LA 70122-3520, ORLEANS COUNTY (Apr 2006)

Name Associated with Address:

Property Ownership Information for this Address

Property:

Parcel Number - [REDACTED]
Owner Name: [REDACTED]
Property Address: - [REDACTED] NEW ORLEANS, LA 70122-3520, ORLEANS

COUNTY

Subdivision Name - [REDACTED]
Total Market Value - [REDACTED]
Assessed Value - [REDACTED]
Land Value - [REDACTED]
Legal Description - [REDACTED]

Data Source - [REDACTED]
Neighborhood Profile (2010 Census)

Average Age: [REDACTED]
Median Household Income: [REDACTED]
Median Owner Occupied Home Value: [REDACTED]
Average Years of Education: [REDACTED]

[REDACTED] BAKER, LA 70714-4805, EAST BATON ROUGE COUNTY (Oct 2005 - Apr 2006)

Name Associated with Address:

Current Residents at Address:

Property Ownership Information for this Address

Property:

Parcel Number - [REDACTED]
Book - [REDACTED]
Page - [REDACTED]
Owner Name: [REDACTED]
Property Address: - [REDACTED] BAKER, LA 70714-4805, EAST BATON ROUGE

COUNTY

Land Usage - [REDACTED]
Subdivision Name - [REDACTED]
Total Market Value - [REDACTED]
Assessed Value - [REDACTED]
Land Value - [REDACTED]
Improvement Value - [REDACTED]
Land Size - [REDACTED]
Legal Description - [REDACTED]
Data Source - [REDACTED]

Neighborhood Profile (2010 Census)

Average Age: [REDACTED]
Median Household Income: [REDACTED]
Median Owner Occupied Home Value: [REDACTED]
Average Years of Education: [REDACTED]

Bankruptcies:

[None Found]

UCC Filings:

[None Found]

Phones Plus:

Phones Plus1

Name: T [REDACTED] C [REDACTED]
Address: [REDACTED] NEW ORLEANS, LA 70122-1522
Phone Number: [REDACTED] - CD1
Phone Type: Mobile
Carrier: SPRINT SPECTRUM LP - (KENNER, LA)

Phones Plus2

Name: T [REDACTED] C [REDACTED]
Address: [REDACTED] GRETNA, LA 70053-6657
Phone Number: [REDACTED] - CDT
Phone Type: Mobile
Carrier: SPRINT SPECTRUM LP - (KENNER, LA)

Phones Plus3

Name: T [REDACTED] C [REDACTED]
Address: [REDACTED] METAIRIE, LA 70001-1864
Phone Number: [REDACTED] - CDT
Phone Type: Mobile
Carrier: SPRINT SPECTRUM LP - (KENNER, LA)

Phones Plus4

Name: T [REDACTED] C [REDACTED]
Address: [REDACTED] GRETNA, LA 70053-6657
Phone Number: [REDACTED] - CDT
Phone Type: Mobile
Carrier: SPRINT SPECTRUM LP - (KENNER, LA)

Phones Plus5

Name: T [REDACTED] C [REDACTED]
Address: [REDACTED] EDGARD, LA 70049-2619
Phone Number: [REDACTED] - CDT
Carrier: BELLSOUTH SO CNTL - (EDGARD, LA)

People at Work:

Maximum 50 People at Work records returned

[None Found]

Driver's License Information:

[None Found]

Possible Properties Owned by Subject:

[None Found]

Motor Vehicles Registered To Subject:

Vehicle:

Description: [REDACTED]
VIN: [REDACTED]
State Of Origin: LOUISIANA
Engine: 6 Cylinder 214 Cubic Inch
Anti Lock Brakes: 4 wheel standard
Air Conditioning: Standard
Daytime Running Lights: Not available
Power Steering: Standard
Power Brakes: Standard
Power Windows: Standard
Security System: Passive Immobilize Key, Keyless entry, and alarm
Roof: Power sun/moon roof
Price: [REDACTED]
Radio: AM/FM CD/MP3
Front Wheel Drive: Yes
Four Wheel Drive: No
Tilt Wheel: Standard
Data Source: Governmental

Registrant(s)

Record Type: HISTORICAL
Name: T [REDACTED] C [REDACTED]
Potential SSN: [REDACTED]
Address: [REDACTED] NEW ORLEANS, LA 70122-1522, ORLEANS COUNTY
DOB: [REDACTED]
Sex: [REDACTED]
Age: [REDACTED]
Tag Number: [REDACTED]
License State: LA
Earliest Registration Date: [REDACTED]
Latest Registration Date: [REDACTED]
Expiration Date: [REDACTED]

Vehicle:

Description: [REDACTED]
VIN: [REDACTED]
State Of Origin: LOUISIANA
Engine: 6 Cylinder 214 Cubic Inch
Anti Lock Brakes: 4 wheel standard

Air Conditioning: Standard
 Daytime Running Lights: Not available
 Power Steering: Standard
 Power Brakes: Standard
 Power Windows: Standard
 Security System: Passive Immobilize Key, Keyless entry, and alarm
 Roof: Power sun/moon roof
 Price: [REDACTED]
 Radio: AM/FM CD/MP3
 Front Wheel Drive: Yes
 Four Wheel Drive: No
 Tilt Wheel: Standard
 Data Source: Governmental

Owner(s)

Name: T [REDACTED] C [REDACTED]
 Potential SSN: [REDACTED]
 Address: [REDACTED] NEW ORLEANS, LA 70122-1522, ORLEANS COUNTY
 DOB: [REDACTED]
 Sex: [REDACTED]
 Age: [REDACTED]
 Title Number: [REDACTED]
 Title Issue Date: [REDACTED]

Lien Holder(s)
 None

Vehicle:

Description: [REDACTED]
 VIN: [REDACTED]
 State Of Origin: LOUISIANA
 Engine: 8 Cylinder 287 Cubic Inch
 Anti Lock Brakes: 4 wheel standard
 Air Conditioning: Standard
 Daytime Running Lights: Not available
 Power Steering: Standard
 Power Brakes: Standard
 Power Windows: Standard
 Security System: Anti-theft device
 Roof: None / not available
 Price: [REDACTED]
 Radio: AM/FM CD
 Front Wheel Drive: No
 Four Wheel Drive: No
 Tilt Wheel: Standard
 Data Source: Governmental

Registrant(s)

Record Type: HISTORICAL
 Name: T [REDACTED] C [REDACTED]
 Potential SSN: [REDACTED]
 Address: [REDACTED] NEW ORLEANS, LA 70117-4612, ORLEANS COUNTY
 DOB: [REDACTED]
 Sex: [REDACTED]
 Age: [REDACTED]
 License State: LA
 Earliest Registration Date: [REDACTED]
 Latest Registration Date: [REDACTED]
 Expiration Date: [REDACTED]

Vehicle:

Description: [REDACTED]
 VIN: [REDACTED]
 State Of Origin: LOUISIANA
 Engine: 8 Cylinder 287 Cubic Inch
 Anti Lock Brakes: 4 wheel standard
 Air Conditioning: Standard
 Daytime Running Lights: Not available
 Power Steering: Standard
 Power Brakes: Standard
 Power Windows: Standard
 Security System: Anti-theft device
 Roof: None / not available
 Price: [REDACTED]
 Radio: AM/FM CD
 Front Wheel Drive: No
 Four Wheel Drive: No
 Tilt Wheel: Standard

Data Source: Governmental

Owner(s)

Name: T [redacted] C [redacted]
Potential SSN: [redacted]
Address: [redacted] NEW ORLEANS, LA 70117-4612, ORLEANS COUNTY
DOB: [redacted]
Sex: [redacted]
Age: [redacted]
Title Number: [redacted]
Title Issue Date: [redacted]

Lien Holder(s)

None

Vehicle:

Description: [redacted]
VIN: [redacted]
State Of Origin: LOUISIANA
Engine: 4 Cylinder 153 Cubic Inch
Anti Lock Brakes: 4 wheel standard
Air Conditioning: Optional
Daytime Running Lights: Not available
Power Steering: Standard
Power Brakes: Standard
Power Windows: Standard
Security System: Passive Engine Immobilizer, Keyless Entry & Alarm
Roof: None / not available
Price: [redacted]
Radio: AM/FM CD
Front Wheel Drive: Yes
Four Wheel Drive: No
Tilt Wheel: Standard
Data Source: Governmental

Registrant(s)

Record Type: HISTORICAL
Name: T [redacted] C [redacted]
Potential SSN: [redacted]
Address: [redacted] EDGARD, LA 70049-2619, ST. JOHN BAPTIST COUNTY
DOB: [redacted]
Sex: [redacted]
Age: [redacted]
License State: LA
Earliest Registration Date: [redacted]
Latest Registration Date: [redacted]
Expiration Date: [redacted]

Vehicle:

Description: [redacted]
VIN: [redacted]
State Of Origin: LOUISIANA
Engine: 4 Cylinder 153 Cubic Inch
Anti Lock Brakes: 4 wheel standard
Air Conditioning: Optional
Daytime Running Lights: Not available
Power Steering: Standard
Power Brakes: Standard
Power Windows: Standard
Security System: Passive Engine Immobilizer, Keyless Entry & Alarm
Roof: None / not available
Price: [redacted]
Radio: AM/FM CD
Front Wheel Drive: Yes
Four Wheel Drive: No
Tilt Wheel: Standard
Data Source: Governmental

Owner(s)

Name: T [redacted] C [redacted]
Potential SSN: [redacted]
Address: [redacted] EDGARD, LA 70049-2619, ST. JOHN BAPTIST COUNTY
DOB: [redacted]
Sex: [redacted]
Age: [redacted]
Title Number: [redacted]
Title Issue Date: [redacted]

Lien Holder(s)
None

Vehicle:

Description: [REDACTED]
VIN: [REDACTED]
State Of Origin: LOUISIANA
Engine: 4 Cylinder 122 Cubic Inch
Anti Lock Brakes: 4 wheel standard
Air Conditioning: Standard
Daytime Running Lights: Not available
Power Steering: Standard
Power Brakes: Standard
Power Windows: Standard
Security System: Passive Engine Immobilizer
Roof: None / not available
Price: [REDACTED]
Radio: AM/FM CD
Front Wheel Drive: Yes
Four Wheel Drive: No
Tilt Wheel: Standard
Data Source: Governmental

Registrant(s)

Record Type: HISTORICAL
Name: T [REDACTED] C [REDACTED]
Potential SSN: [REDACTED]
Address: [REDACTED] EDGARD, LA 70049-2619, ST. JOHN BAPTIST COUNTY
DOB: [REDACTED]
Sex: [REDACTED]
Age: [REDACTED]
License State: LA
Earliest Registration Date: [REDACTED]
Latest Registration Date: [REDACTED]
Expiration Date: [REDACTED]

Vehicle:

Description: [REDACTED]
VIN: [REDACTED]
State Of Origin: LOUISIANA
Engine: 4 Cylinder 122 Cubic Inch
Anti Lock Brakes: 4 wheel standard
Air Conditioning: Standard
Daytime Running Lights: Not available
Power Steering: Standard
Power Brakes: Standard
Power Windows: Standard
Security System: Passive Engine Immobilizer
Roof: None / not available
Price: [REDACTED]
Radio: AM/FM CD
Front Wheel Drive: Yes
Four Wheel Drive: No
Tilt Wheel: Standard
Data Source: Governmental

Owner(s)

Name: T [REDACTED] C [REDACTED]
Potential SSN: [REDACTED]
Address: [REDACTED] EDGARD, LA 70049-2619, ST. JOHN BAPTIST COUNTY
DOB: [REDACTED]
Sex: [REDACTED]
Age: [REDACTED]
Title Issue Date: [REDACTED]

Lien Holder(s)
None

Vehicle:

Description: [REDACTED]
VIN: [REDACTED]
State Of Origin: LOUISIANA
Engine: 4 Cylinder 90 Cubic Inch
Anti Lock Brakes: Not available
Air Conditioning: Optional
Daytime Running Lights: Not available
Power Steering: Optional

Power Brakes: Standard
Power Windows: Not available
Security System: None
Roof: None / not available
Price: [REDACTED]
Radio: None
Front Wheel Drive: Yes
Four Wheel Drive: No
Tilt Wheel: Not available
Data Source: Governmental

Registrant(s)

Record Type: HISTORICAL
Name: T [REDACTED] C [REDACTED]
Potential SSN [REDACTED]: [REDACTED]
Address: [REDACTED] BAKER, LA 70714-4805, EAST BATON ROUGE COUNTY
DOB: [REDACTED]
Sex: [REDACTED]
Age: [REDACTED]
License State: LA
Earliest Registration Date: [REDACTED]
Latest Registration Date: [REDACTED]
Expiration Date: [REDACTED]

Record Type: HISTORICAL
Name: T [REDACTED] C [REDACTED]
Potential SSN [REDACTED]: [REDACTED]
Address: [REDACTED] EDGARD, LA 70049-2619, ST. JOHN BAPTIST COUNTY
DOB: [REDACTED]
Sex: [REDACTED]
Age: [REDACTED]
License State: LA
Earliest Registration Date: [REDACTED]
Latest Registration Date: [REDACTED]
Expiration Date: [REDACTED]

Vehicle:

Description: [REDACTED]
VIN: [REDACTED]
State Of Origin: LOUISIANA
Engine: 4 Cylinder 90 Cubic Inch
Anti Lock Brakes: Not available
Air Conditioning: Optional
Daytime Running Lights: Not available
Power Steering: Optional
Power Brakes: Standard
Power Windows: Not available
Security System: None
Roof: None / not available
Price: [REDACTED]
Radio: None
Front Wheel Drive: Yes
Four Wheel Drive: No
Tilt Wheel: Not available
Data Source: Governmental

Owner(s)

Name: T [REDACTED] C [REDACTED]
Potential SSN [REDACTED]: [REDACTED]
Address: [REDACTED] BAKER, LA 70714-4805, EAST BATON ROUGE COUNTY
DOB: [REDACTED]
Sex: [REDACTED]
Age: [REDACTED]
Title Issue Date: [REDACTED]

Name: T [REDACTED] C [REDACTED]
Potential SSN [REDACTED]: [REDACTED]
Address: [REDACTED] EDGARD, LA 70049-2619, ST. JOHN BAPTIST COUNTY
DOB: [REDACTED]
Sex: [REDACTED]
Age: [REDACTED]
Title Issue Date: [REDACTED]

Lien Holder(s)

None

Vehicle:

Description: [REDACTED]
 VIN: [REDACTED]
 State Of Origin: LOUISIANA
 Engine: 6 Cylinder 181 Cubic Inch
 Anti Lock Brakes: Not available
 Air Conditioning: Optional
 Daytime Running Lights: Not available
 Power Steering: Standard
 Power Brakes: Standard
 Power Windows: Optional
 Security System: None
 Roof: None / not available
 Price: [REDACTED]
 Radio: None
 Front Wheel Drive: No
 Four Wheel Drive: No
 Tilt Wheel: Not available
 Data Source: Governmental

Registrant(s)

Record Type: HISTORICAL
 Name: T [REDACTED] C [REDACTED]
 Potential SSN: [REDACTED]
 Address: [REDACTED] EDGARD, LA 70049-2619, ST. JOHN BAPTIST COUNTY
 DOB: [REDACTED]
 Sex: [REDACTED]
 Age: [REDACTED]
 License State: LA
 Earliest Registration Date: [REDACTED]
 Latest Registration Date: [REDACTED]
 Expiration Date: [REDACTED]

Vehicle:

Description: [REDACTED]
 VIN: [REDACTED]
 State Of Origin: LOUISIANA
 Engine: 6 Cylinder 181 Cubic Inch
 Anti Lock Brakes: Not available
 Air Conditioning: Optional
 Daytime Running Lights: Not available
 Power Steering: Standard
 Power Brakes: Standard
 Power Windows: Optional
 Security System: None
 Roof: None / not available
 Price: [REDACTED]
 Radio: None
 Front Wheel Drive: No
 Four Wheel Drive: No
 Tilt Wheel: Not available
 Data Source: Governmental

Owner(s)

Name: T [REDACTED] C [REDACTED]
 Potential SSN: [REDACTED]
 Address: [REDACTED] EDGARD, LA 70049-2619, ST. JOHN BAPTIST COUNTY
 DOB: [REDACTED]
 Sex: [REDACTED]
 Age: [REDACTED]
 Title Number: [REDACTED]
 Title Issue Date: [REDACTED]

Lien Holder(s)

None

Watercraft:

[None Found]

FAA Certifications:

[None Found]

FAA Aircrafts:

[None Found]

Possible Criminal Records:

[None Found]

Sexual Offenses:

[None Found]

Florida Accidents:

[None Found]

Professional License(s):

[None Found]

Voter Registration:

Name: T [REDACTED] C [REDACTED]
Address: [REDACTED] GRETNA, LA 70053-6657
DOB: [REDACTED]
Gender: [REDACTED]
Ethnicity: [REDACTED]
Last Vote Date: [REDACTED]
Registration Date: [REDACTED]
Political Party: [REDACTED]
State of Registration: Louisiana
Status: ACTIVE

Name: T [REDACTED] C [REDACTED]
Address: [REDACTED] GRETNA, LA 70053-6657
DOB: [REDACTED]
Gender: [REDACTED]
Ethnicity: [REDACTED]
Registration Date: [REDACTED]
Political Party: [REDACTED]
State of Registration: Louisiana

Name: T [REDACTED] C [REDACTED]
Address: [REDACTED] GRETNA, LA 70053-6657
DOB: [REDACTED]
Gender: [REDACTED]
Ethnicity: [REDACTED]
Last Vote Date: [REDACTED]
Registration Date: [REDACTED]
Political Party: [REDACTED]
State of Registration: Louisiana
Status: ACTIVE

Name: T [REDACTED] C [REDACTED]
Address: [REDACTED] NEW ORLEANS, LA 70122-1522
DOB: [REDACTED]
Gender: [REDACTED]
Ethnicity: [REDACTED]
Last Vote Date: [REDACTED]
Registration Date: [REDACTED]
Political Party: [REDACTED]
State of Registration: Louisiana
Status: ACTIVE

Name: T [REDACTED] C [REDACTED]
Address: [REDACTED] NEW ORLEANS, LA 70127-1448
DOB: [REDACTED]
Gender: [REDACTED]
Ethnicity: [REDACTED]
Last Vote Date: [REDACTED]
Registration Date: [REDACTED]
Political Party: [REDACTED]
State of Registration: Louisiana
Status: ACTIVE

Name: T [REDACTED] C [REDACTED]
Address: [REDACTED] NEW ORLEANS, LA 70127-1448
DOB: [REDACTED]
Gender: [REDACTED]
Ethnicity: [REDACTED]
Last Vote Date: [REDACTED]
Registration Date: [REDACTED]
Political Party: [REDACTED]
State of Registration: Louisiana

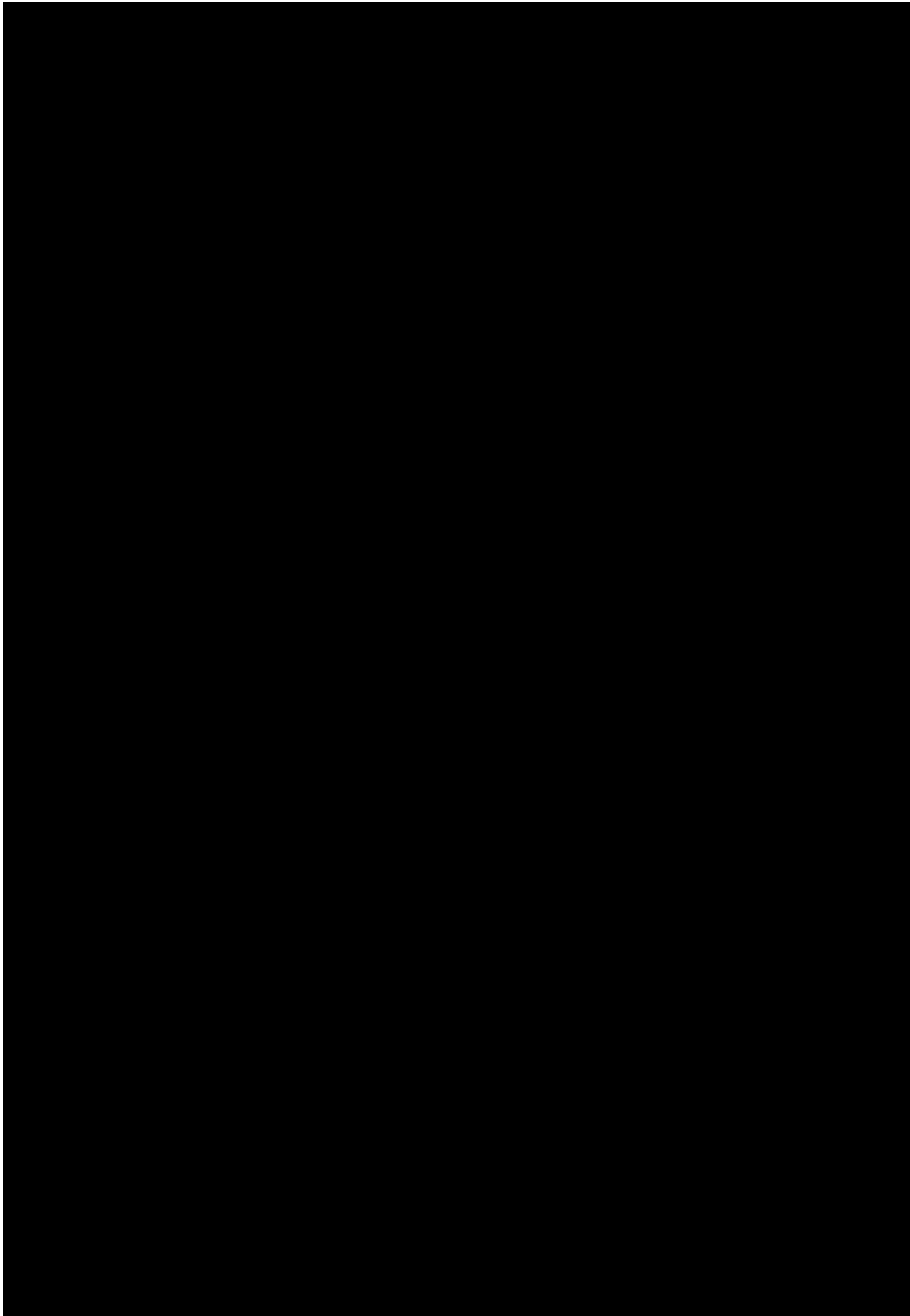
Hunting/Fishing Permit:

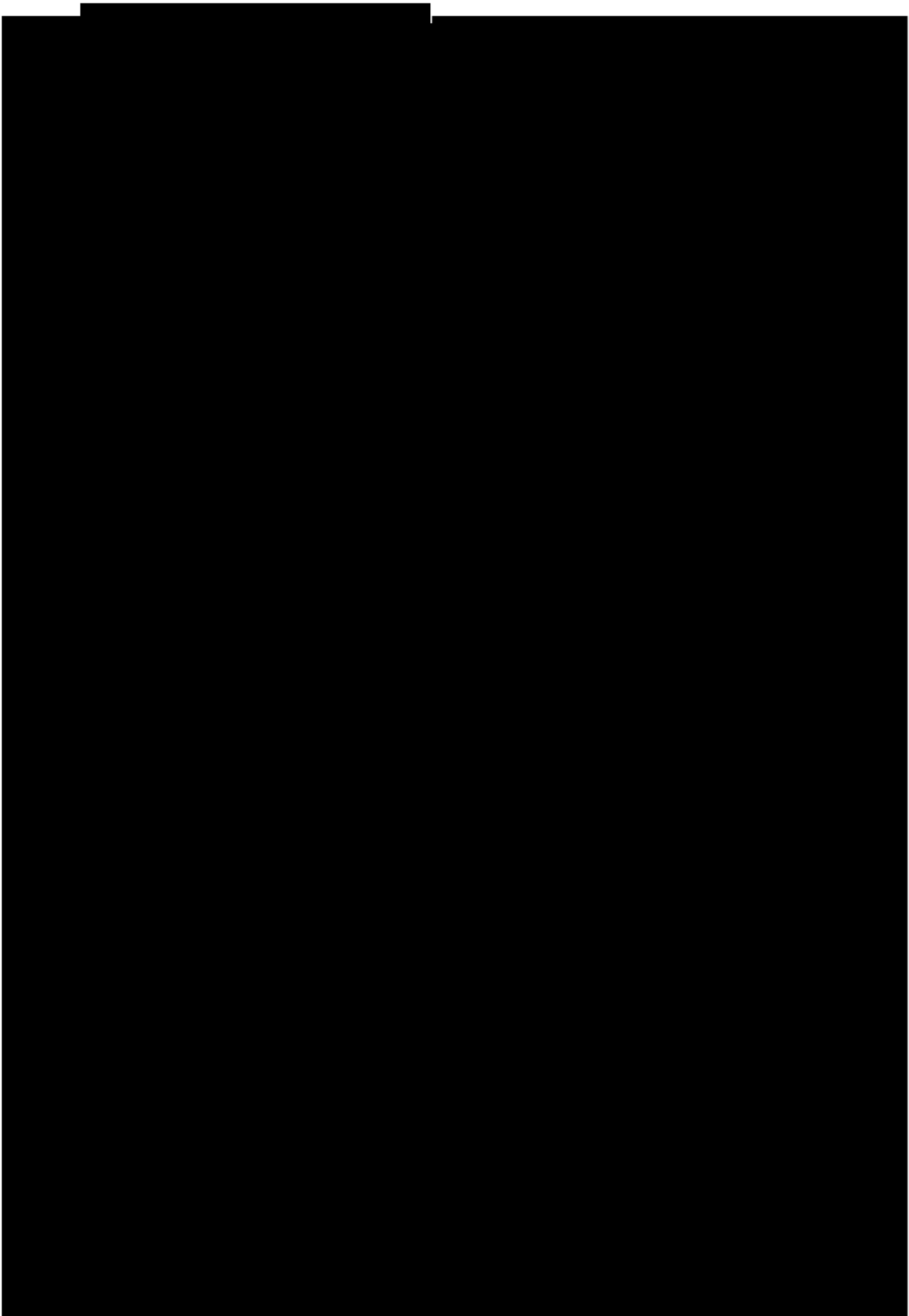
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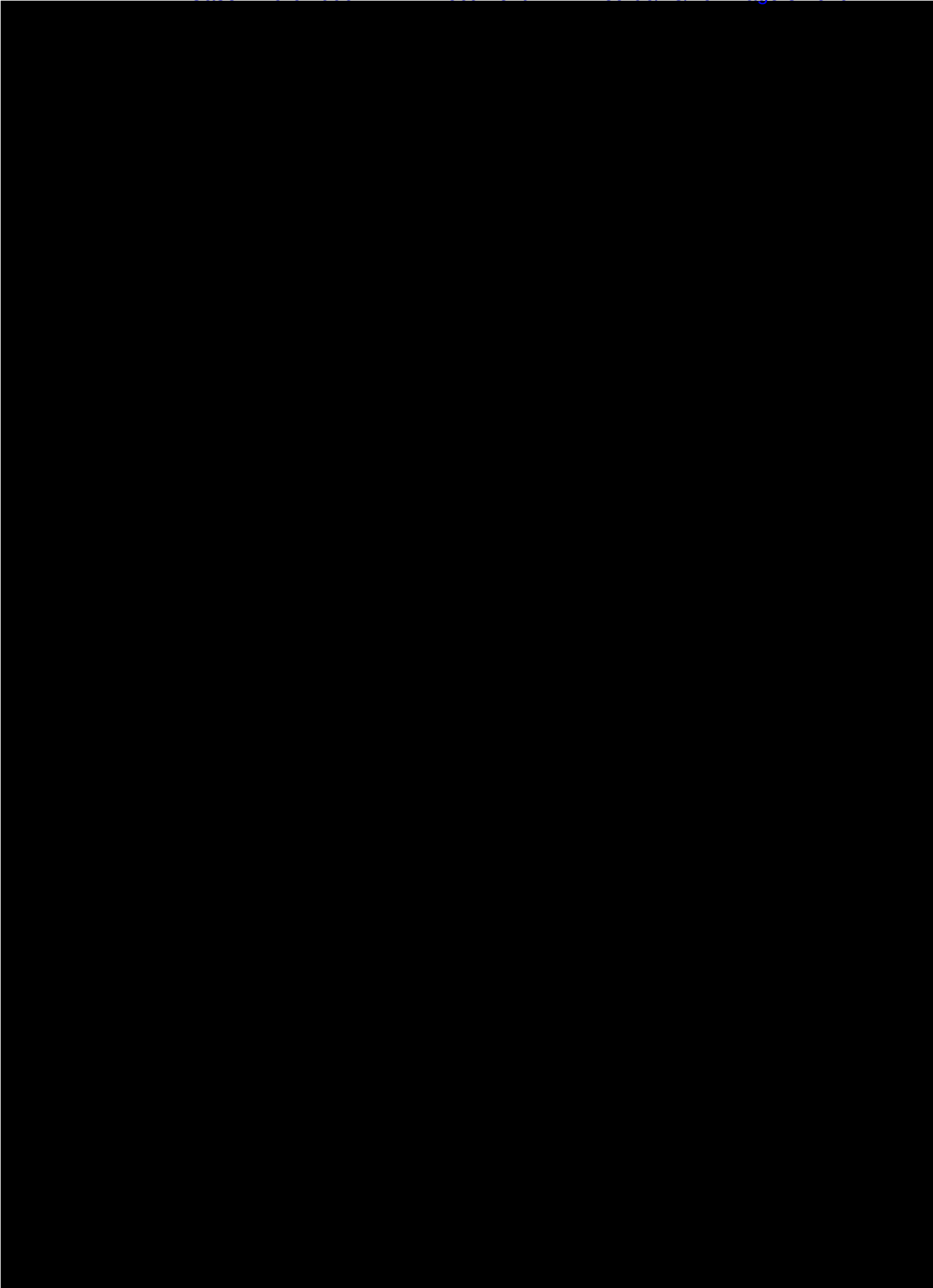
Concealed Weapons Permit:

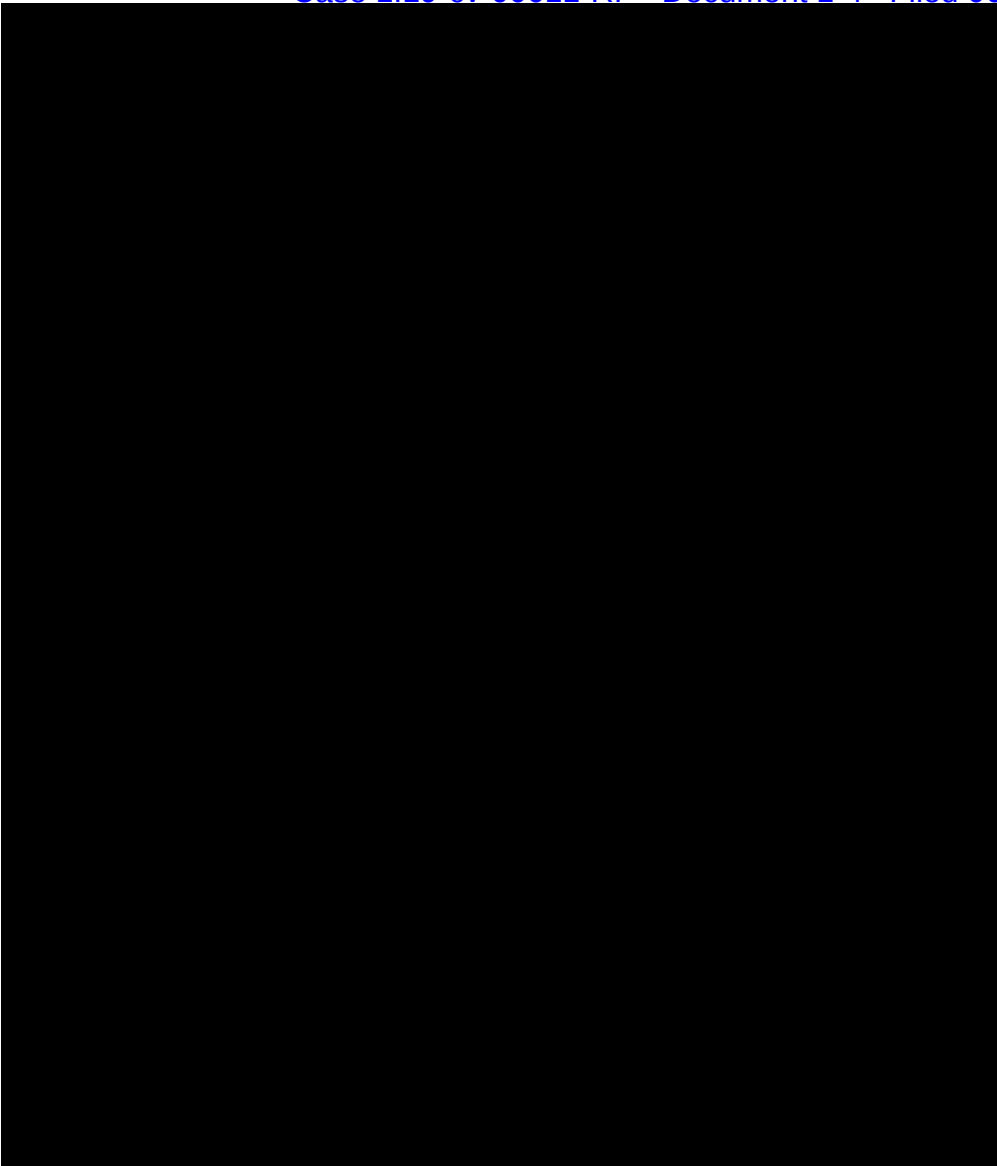
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Possible Associates:

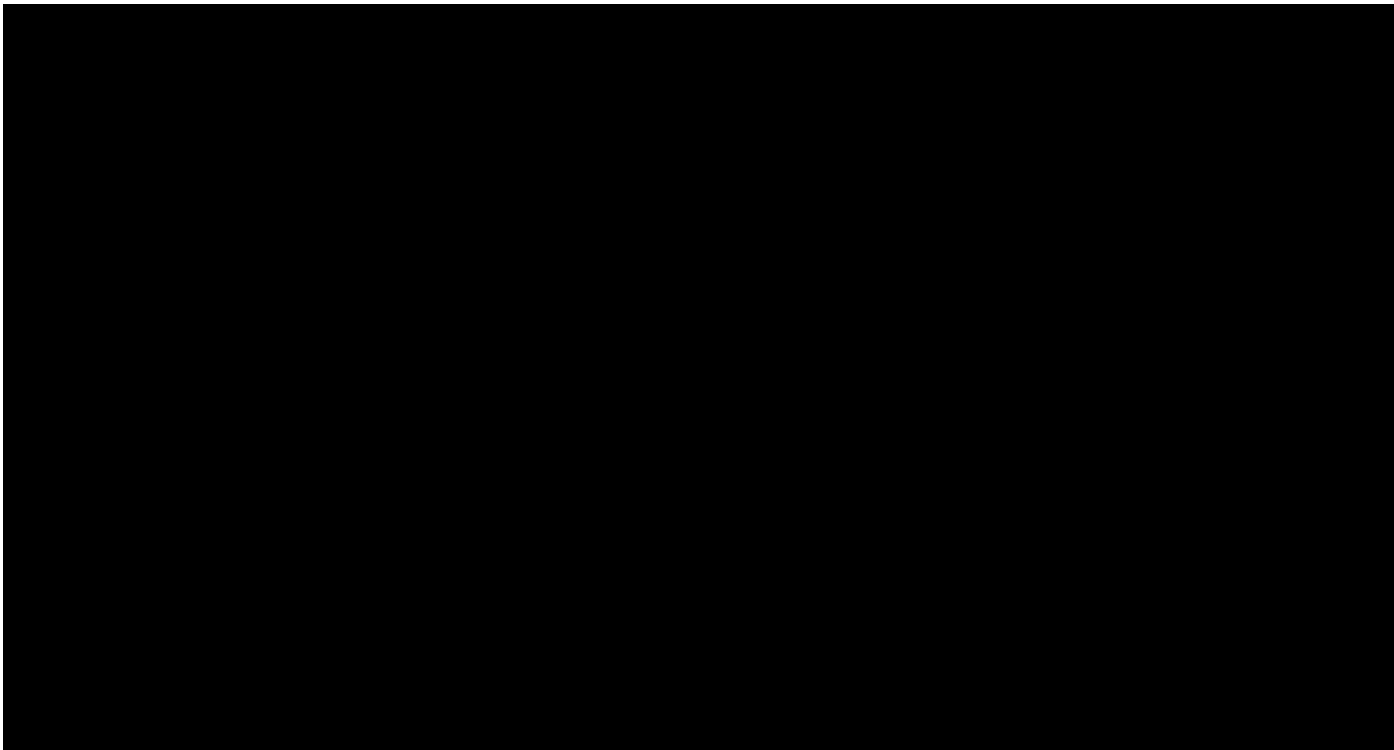


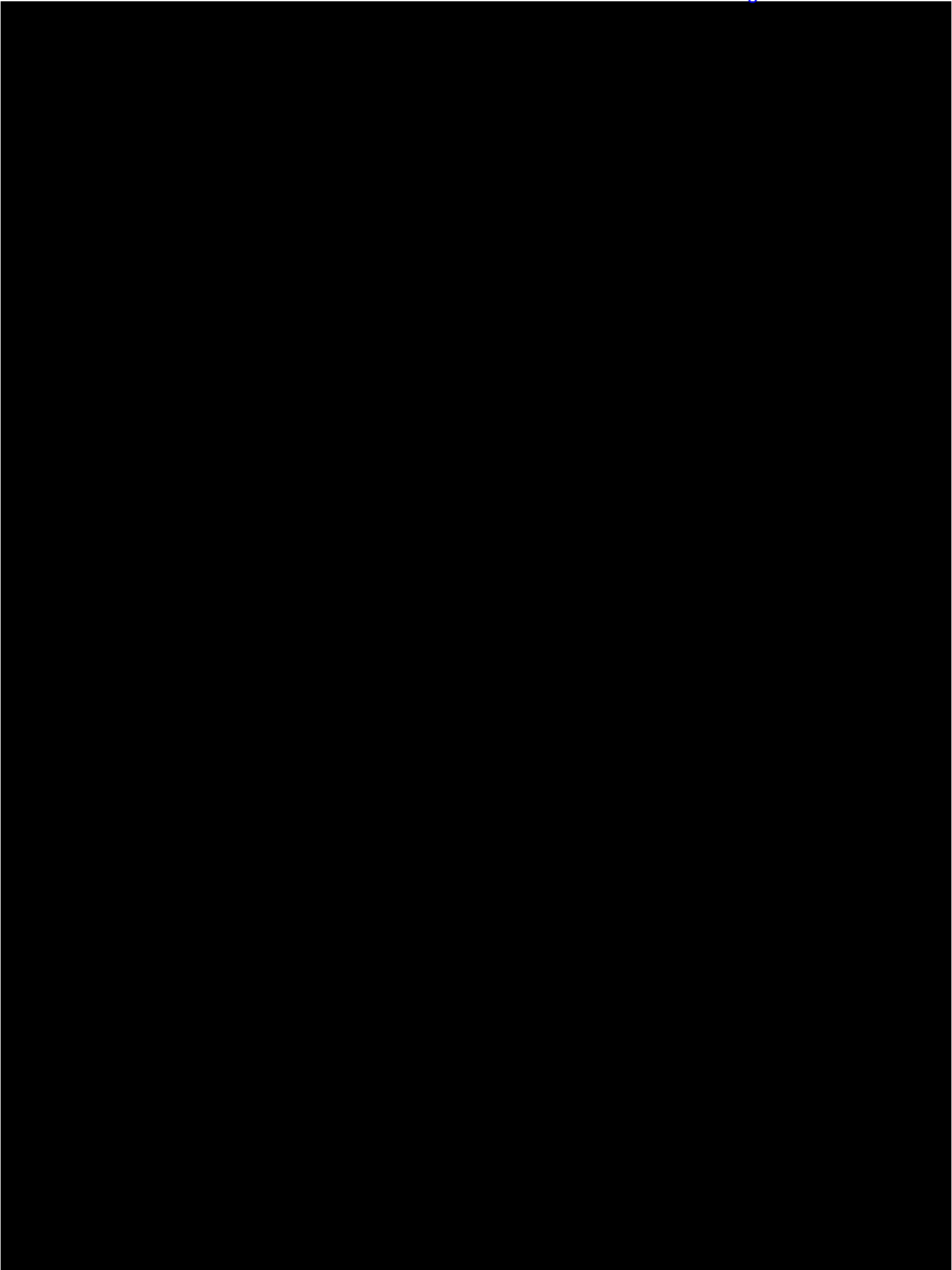


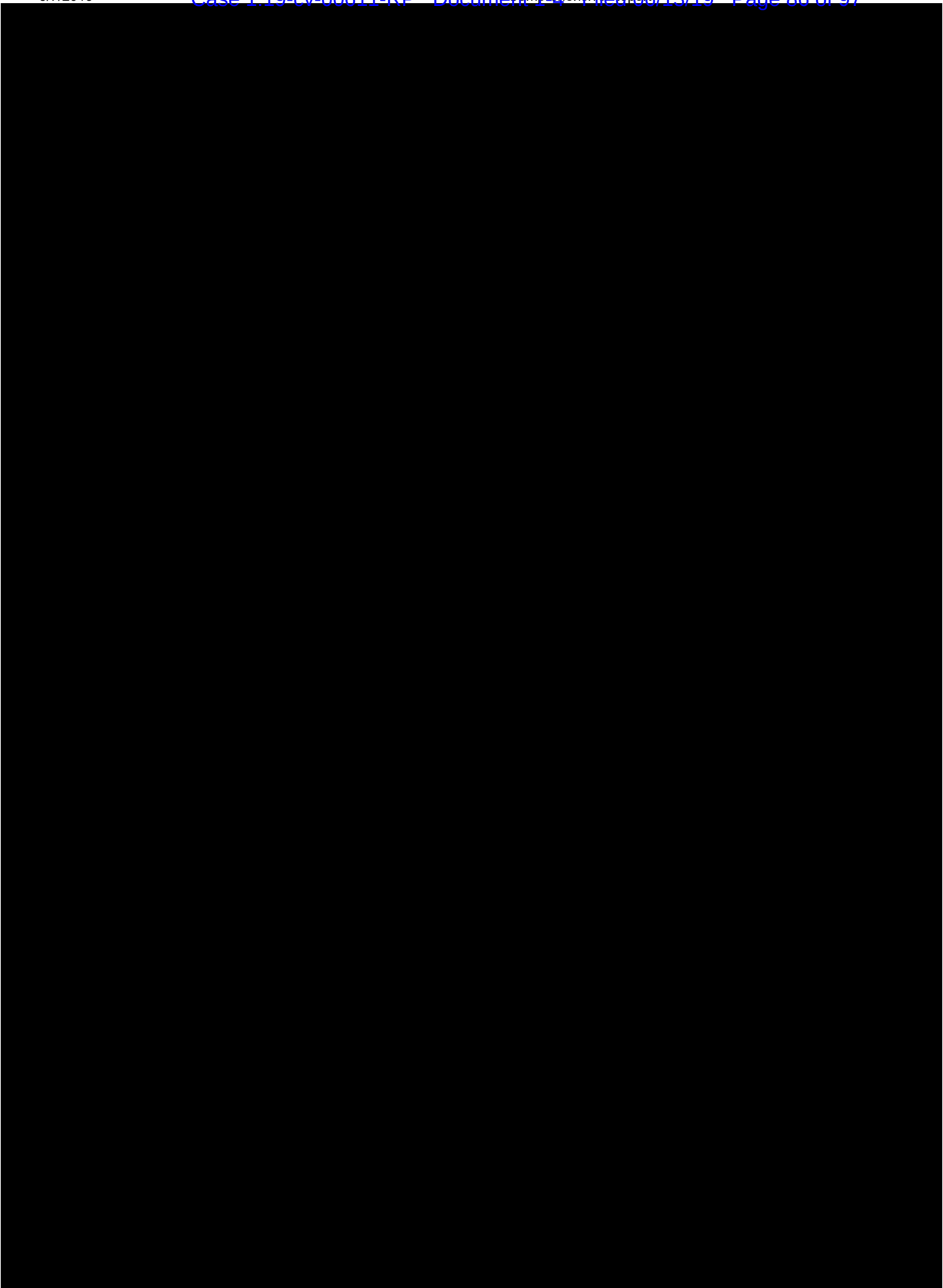


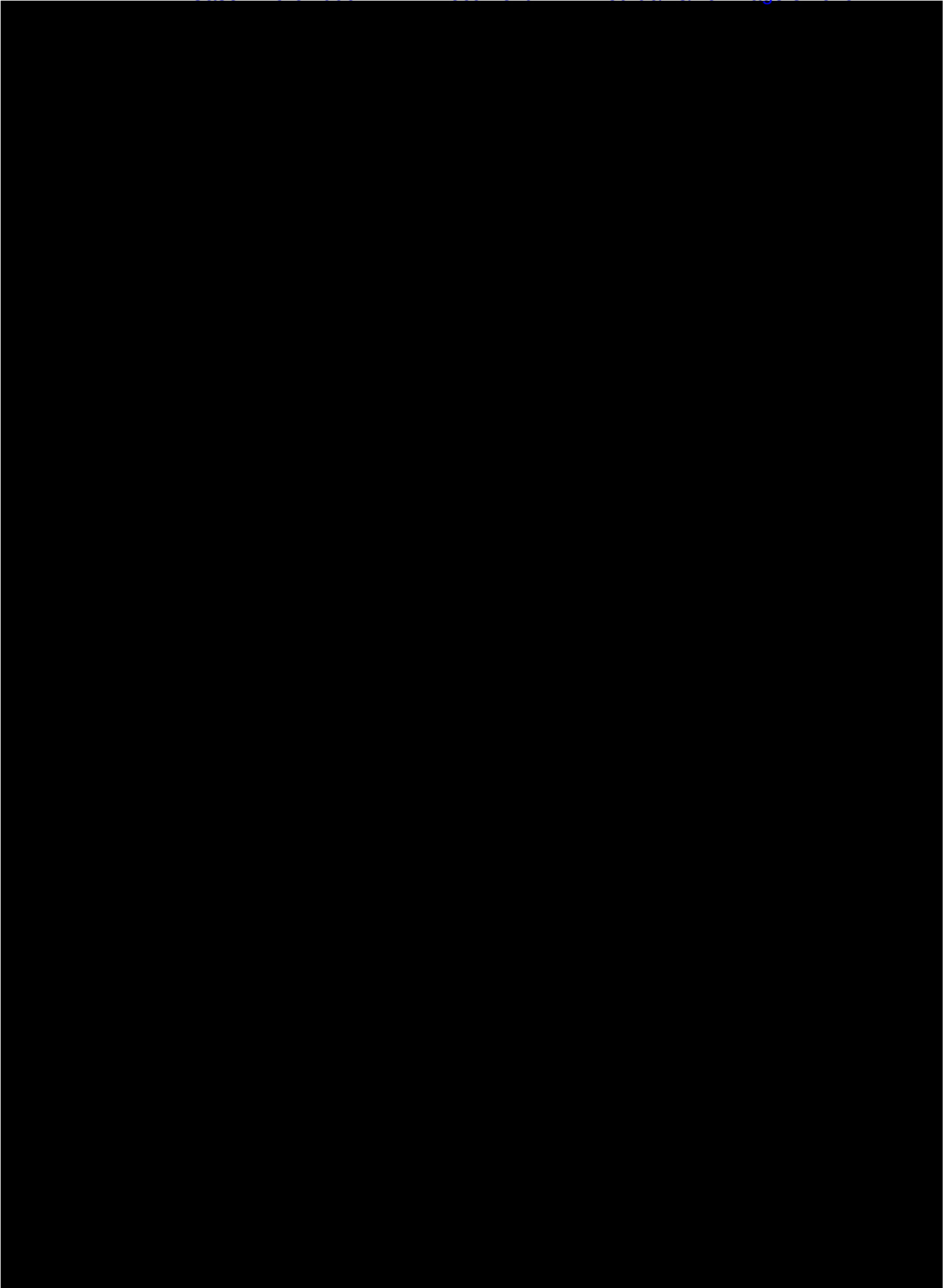


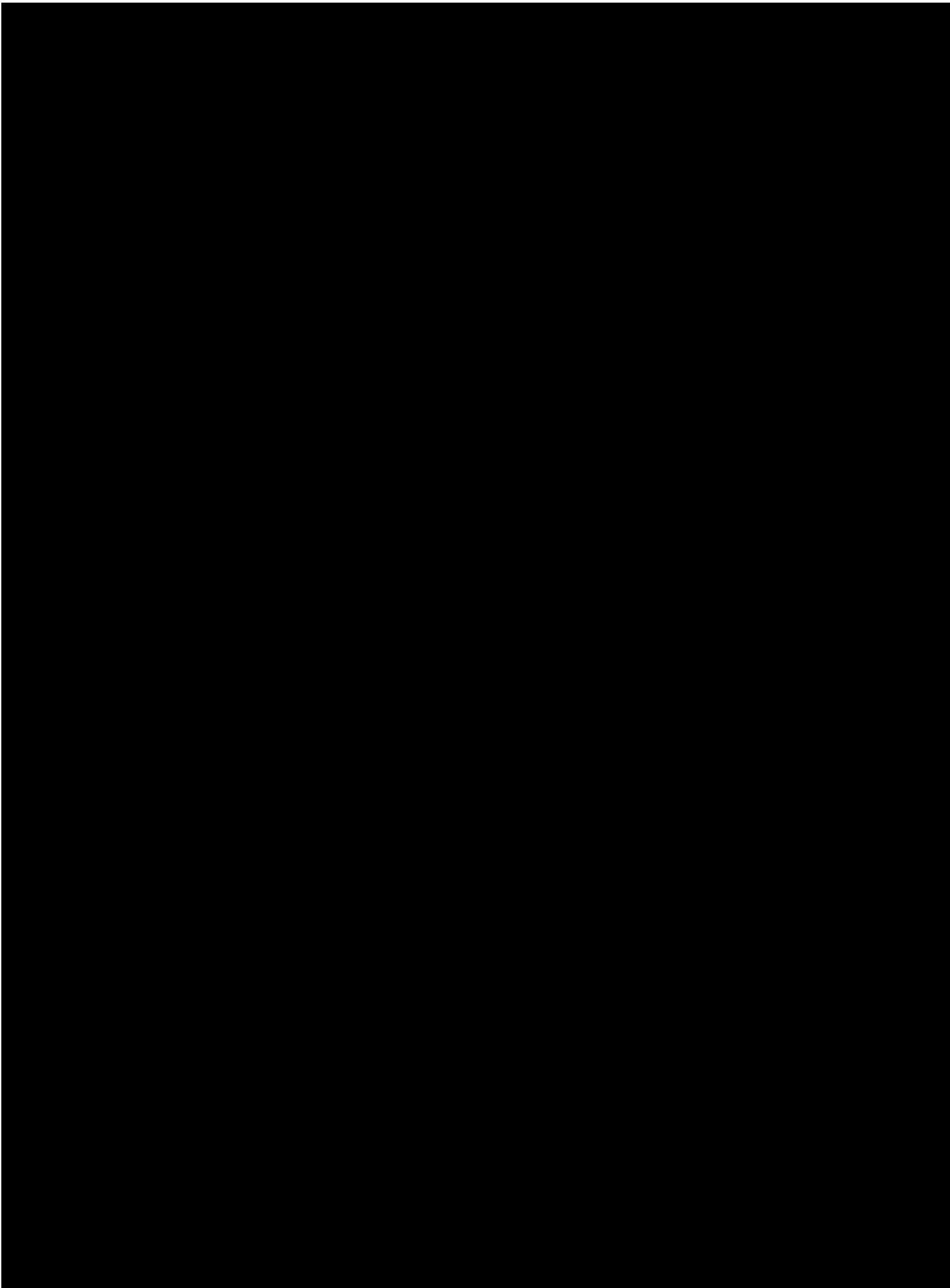
Possible Relatives:

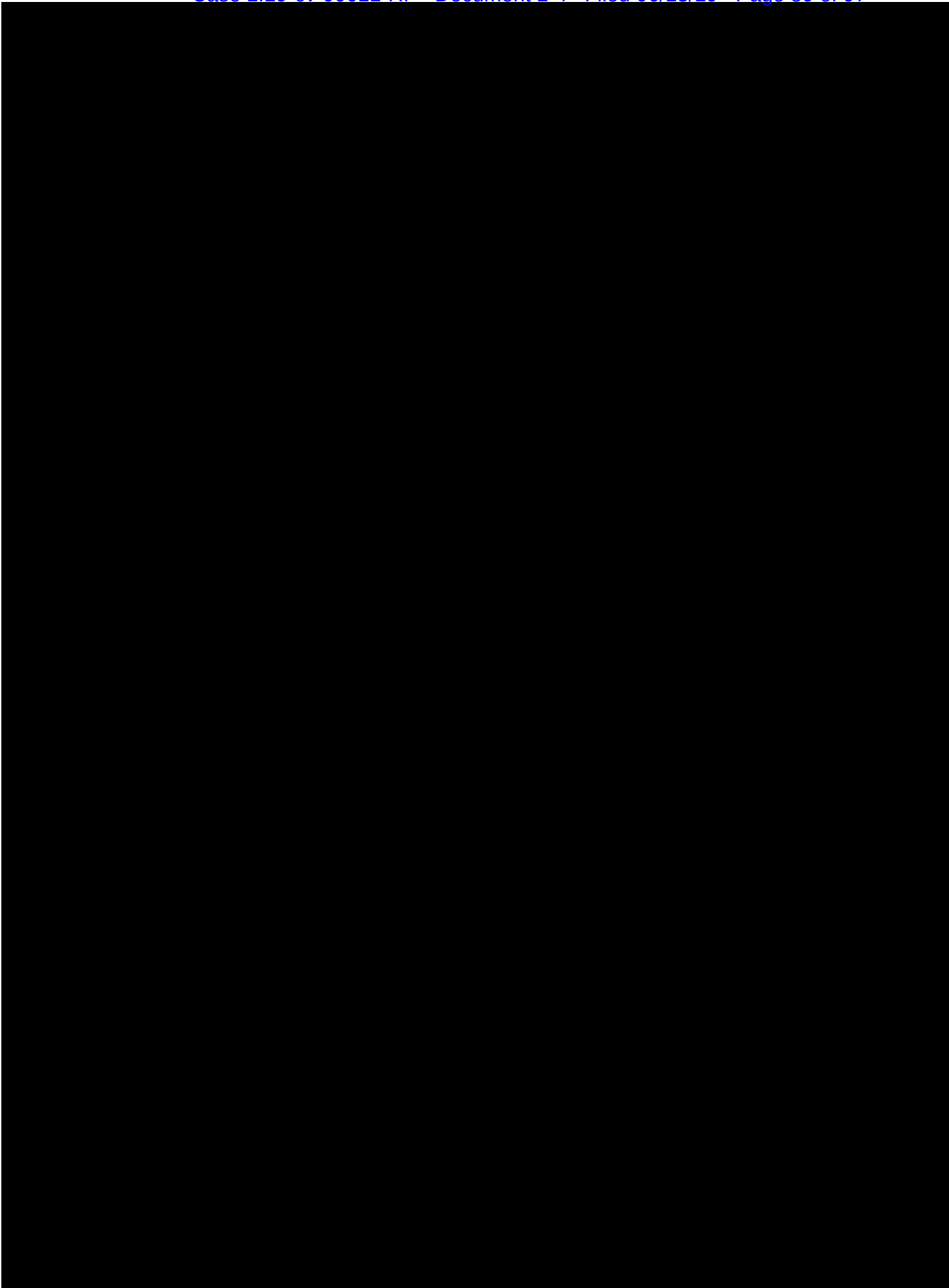


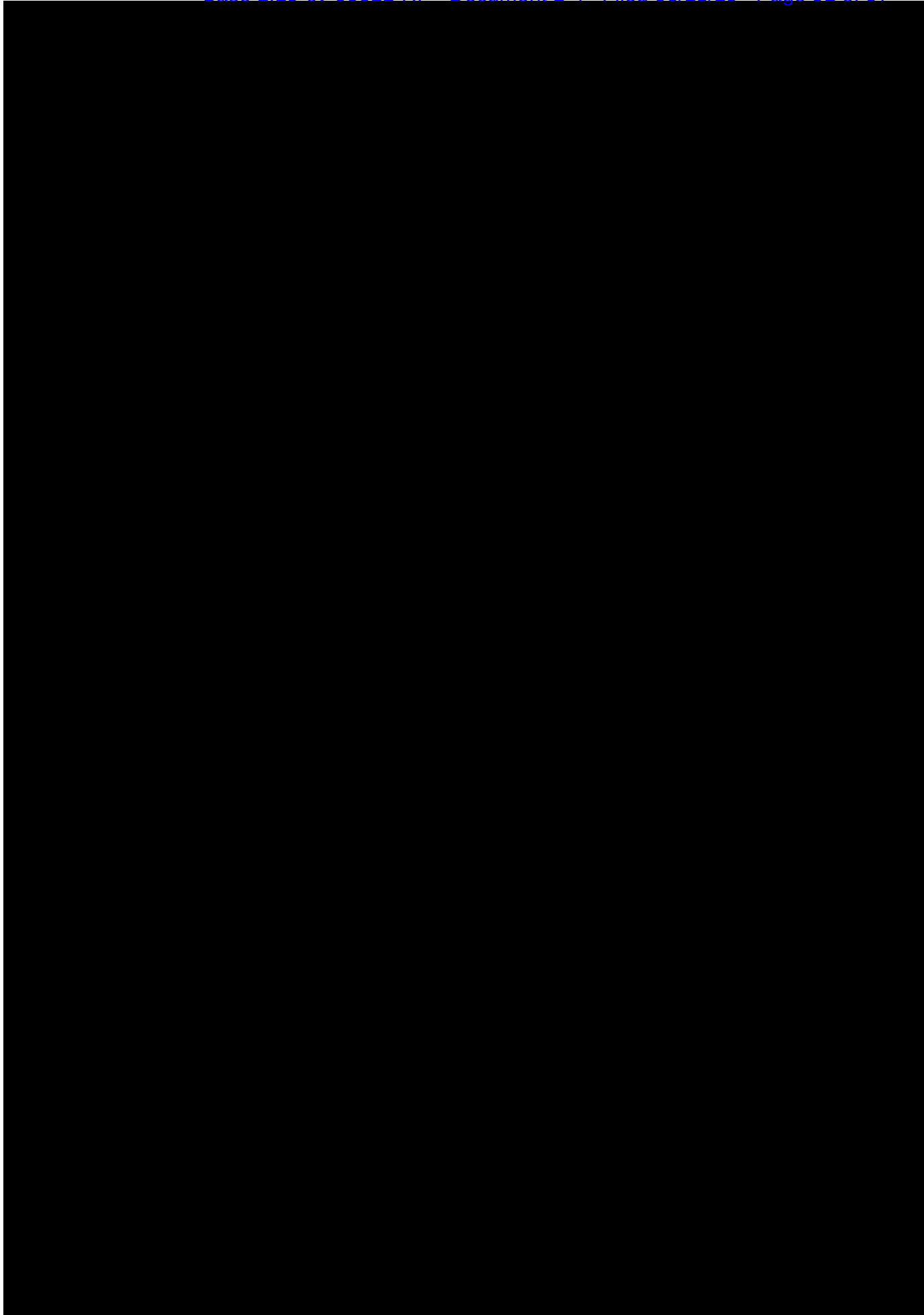


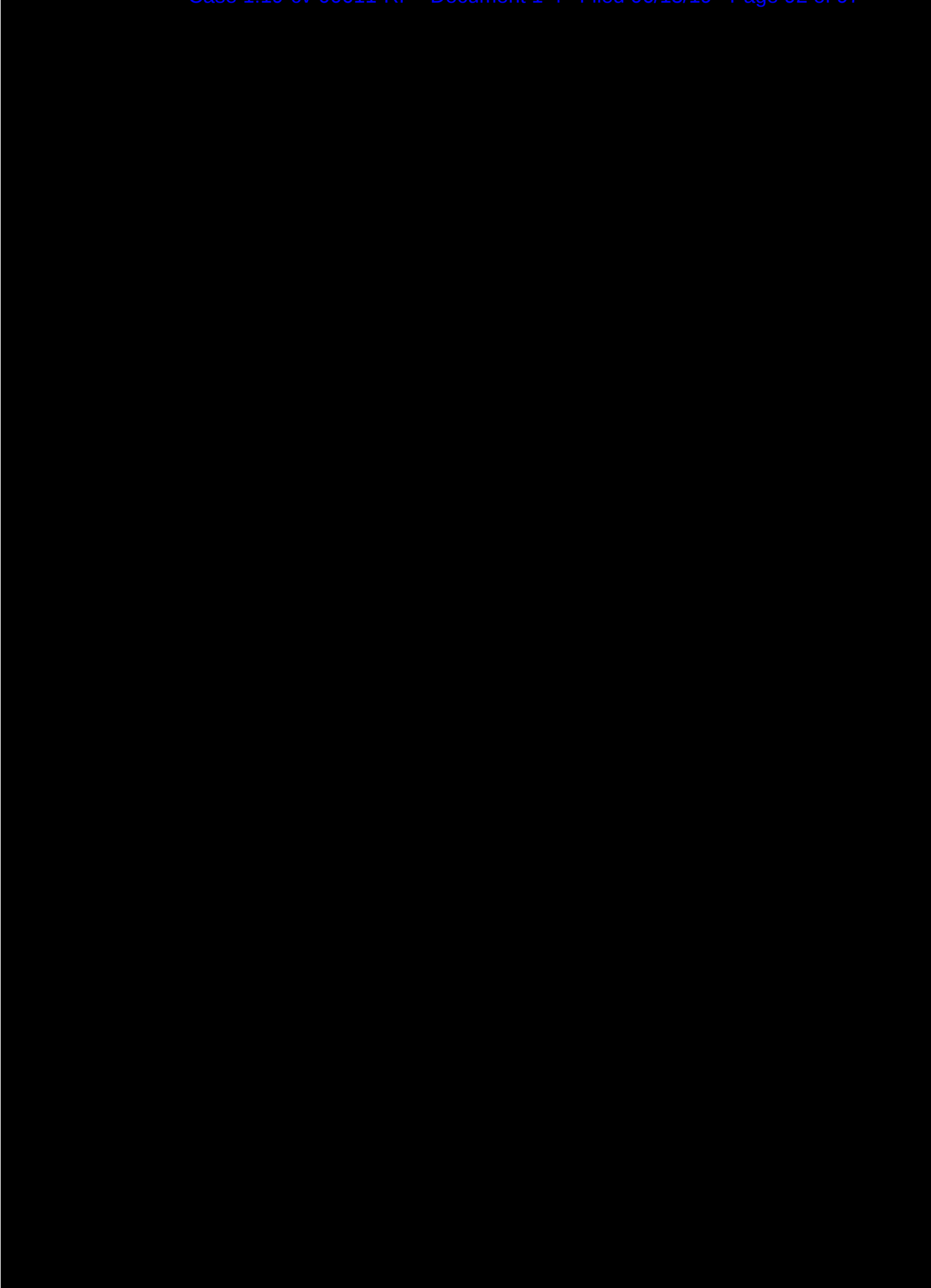


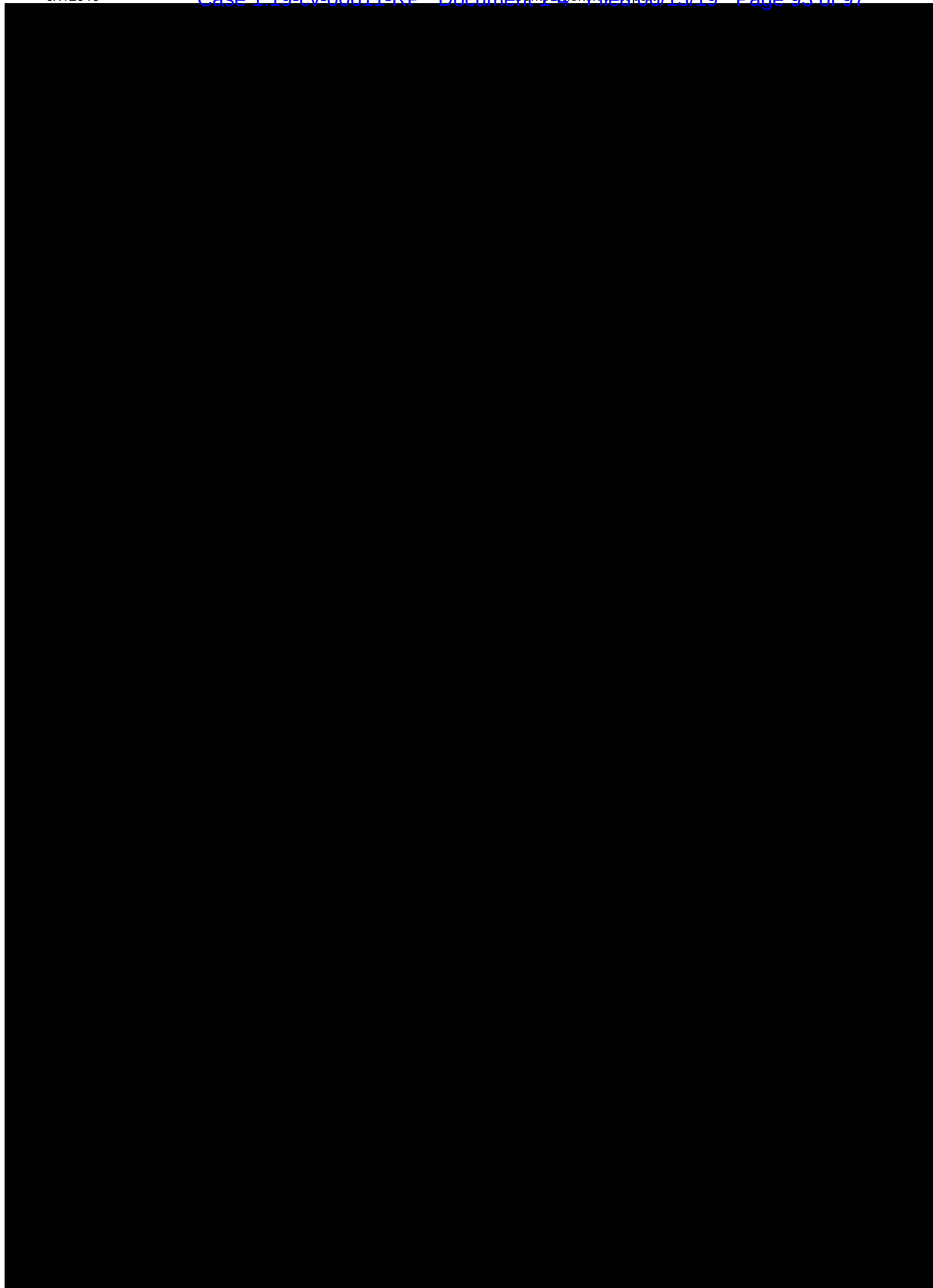


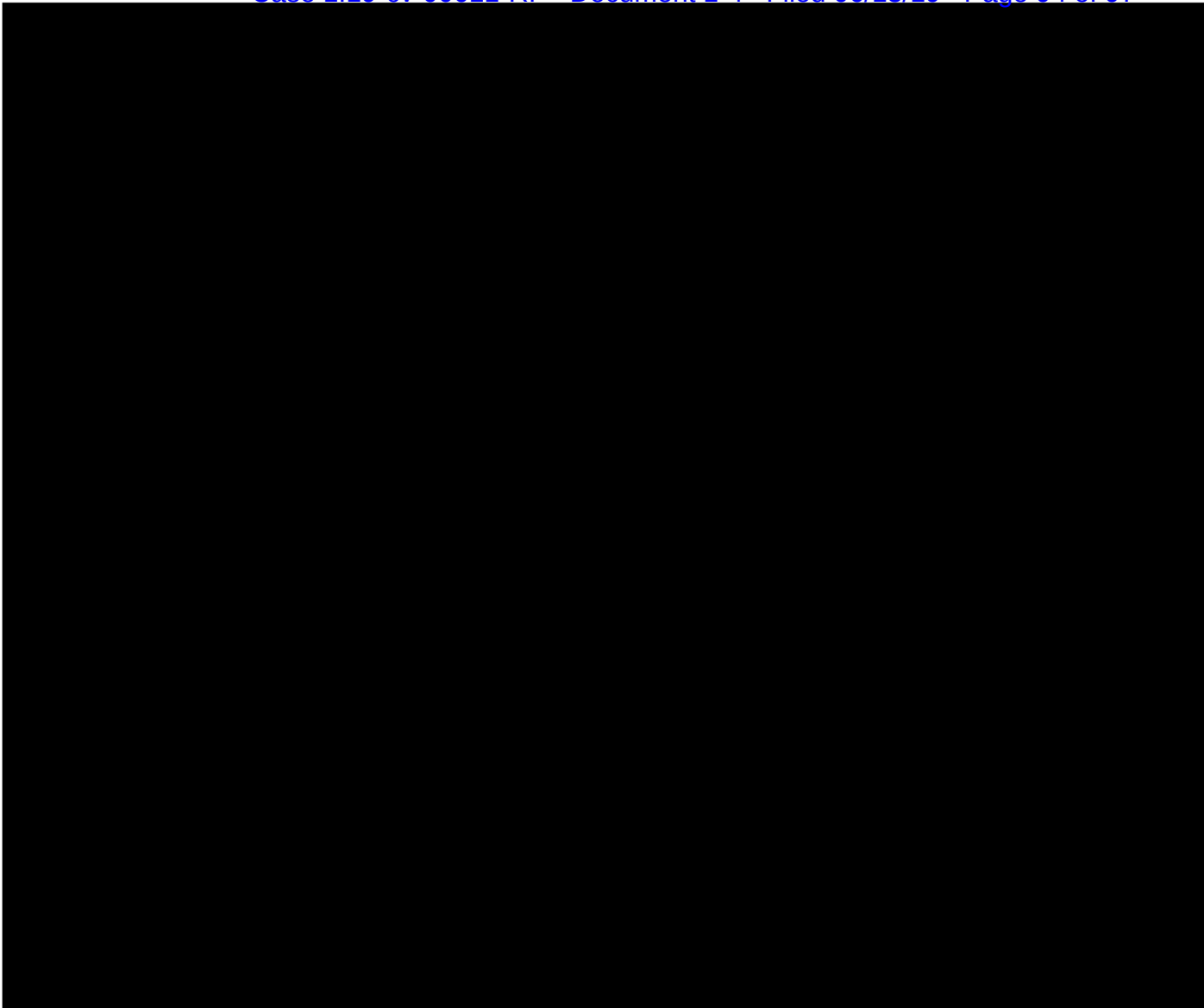












Neighbors:

Neighborhood:



NEW ORLEANS, LA 70122-1522, ORLEANS COUNTY

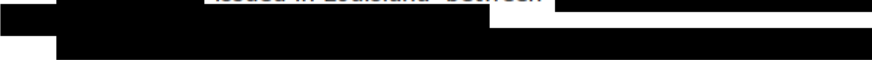
(Feb 2011 - May 2019)

Residents:

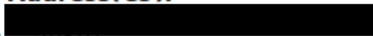
T [redacted] C [redacted]

DOB: [redacted]

Issued in Louisiana between [redacted]



Address(es):

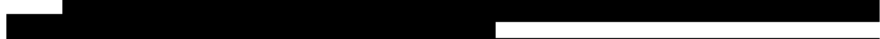
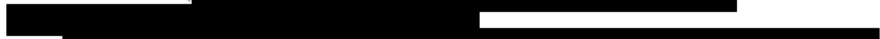
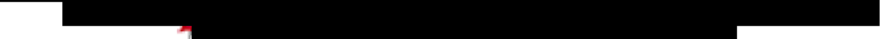


NEW ORLEANS, LA 70122-1522, ORLEANS COUNTY

(Feb 2011 - Mar 2019)

Residents:

D [redacted]



[Redacted text block]

[Redacted text block]

[Redacted text block]

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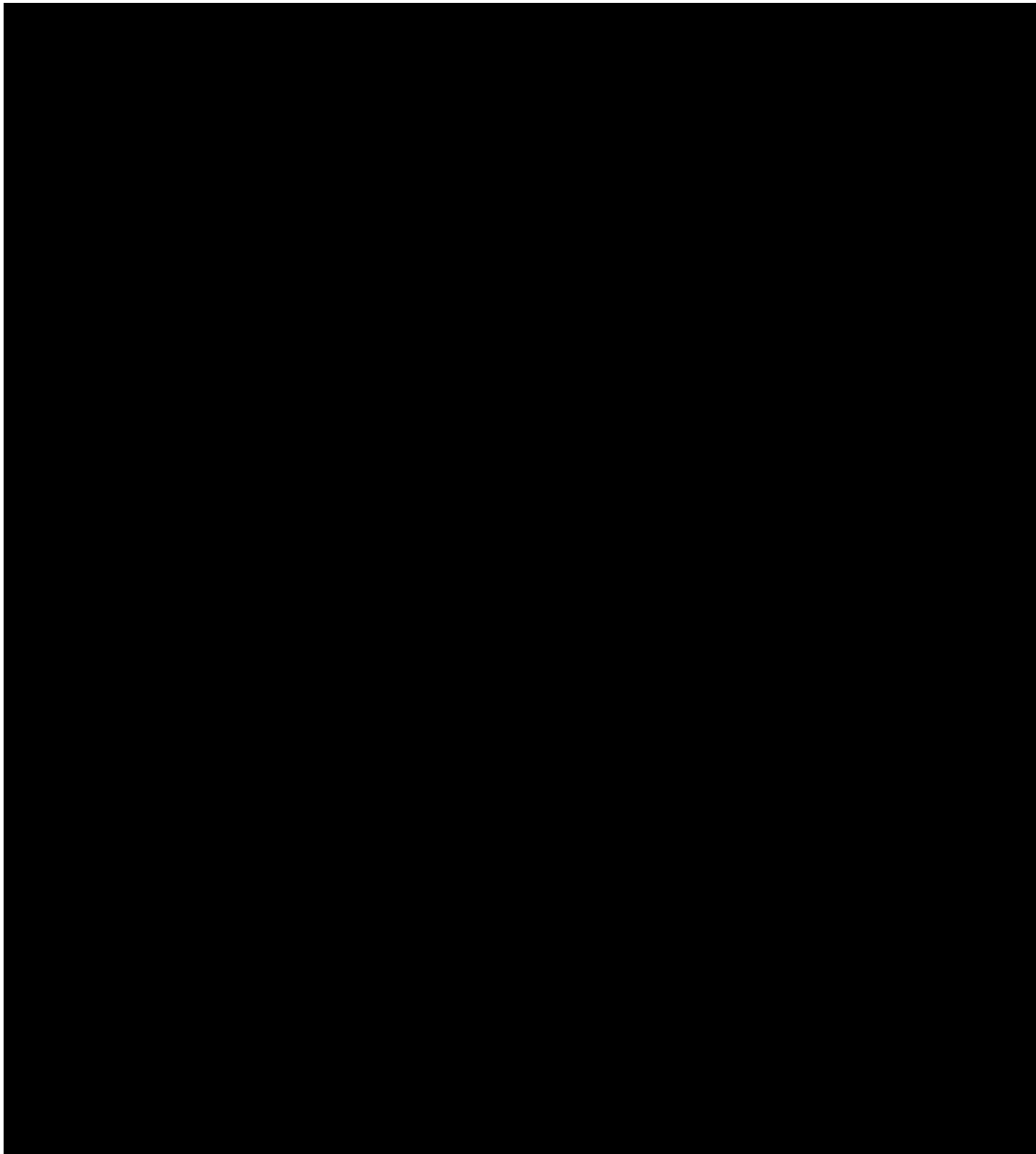
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Source Information:

All Sources	102 Source Document(s)
Motor Vehicle Registrations	31 Source Document(s)
Person Locator 1	6 Source Document(s)
Voter Registrations	6 Source Document(s)
PhonesPlus Records	5 Source Document(s)
Historical Person Locator	17 Source Document(s)
Utility Locator	2 Source Document(s)
Person Locator 5	21 Source Document(s)
Person Locator 6	14 Source Document(s)

EXHIBIT 5

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

MELANIE MOCK, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

ST. DAVID'S HEALTHCARE
PARTNERSHIP, L.P., LLP,

Defendant.

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§

CIVIL ACTION NO. _____

DECLARATION OF DENISE BRADLEY

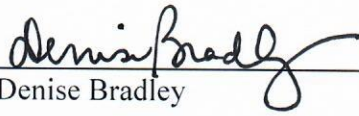
1. My name is Denise Bradley. I am over the age of 21, of sound mind, and I am competent and legally capable of making this declaration. The facts stated herein are true and correct and are within my personal knowledge based on my experience described below.

2. I am the Vice President of Communications and Community Affairs of St. David's Healthcare Partnership, L.P., LLP ("St. David's"). In that capacity, I have personal knowledge of the legal structure of St. David's. I have worked at St. David's for eight and a half years.

3. St. David's is a limited liability partnership organized under the laws of the State of Texas. St. David's principal place of business and principal office is in Austin, Texas. St. David's operates in Austin, Texas, and its partners direct, control, and coordinate St. David's activities in and from Austin, Texas.

4. I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 11, 2019 in Austin, Texas.


Denise Bradley

CIVIL COVER SHEET

The JS 44 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, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Melanie Mock, on behalf of herself and all others similarly situated

(b) County of Residence of First Listed Plaintiff Travis County, TX (EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number) Daniel Blumberg & Peter Bagley, Blumberg Bagley PLLC, 2304 Interstate 20 West, Suite 190, Arlington, TX 76017, Tel: (817) 277-1500, Fax: (817) 277-1170

DEFENDANTS

St. David's Healthcare Partnership, L.P., LLP

County of Residence of First Listed Defendant (IN U.S. PLAINTIFF CASES ONLY)

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

Attorneys (If Known) J. Patrick Bredehoff & William M. Katz, Jr., Thompson & Knight LLP, 1722 Routh Street, Suite 1500, Dallas, TX 75201, Tel: (214) 969-1700, Fax: (214) 969-1751

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)

Table with columns for Plaintiff (PTF) and Defendant (DEF) citizenship and business location. Includes categories like Citizen of This State, Citizen of Another State, Citizen or Subject of a Foreign Country, and Foreign Nation.

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Large table with columns: CONTRACT, REAL PROPERTY, CIVIL RIGHTS, TORTS, PRISONER PETITIONS, LABOR, IMMIGRATION, FORFEITURE/PENALTY, SOCIAL SECURITY, FEDERAL TAX SUITS, BANKRUPTCY, OTHER STATUTES. Contains numerous checkboxes for specific legal categories.

V. 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), 6 Multidistrict Litigation - Transfer, 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): 28 U.S.C. s. 1332(d)
Brief description of cause: Plaintiff seeks declaratory and injunctive relief that defendant's billing practices are allegedly unconscionable

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ 5,000,000.00 CHECK YES only if demanded in complaint: JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY

(See instructions): JUDGE DOCKET NUMBER

DATE 06/13/2019 SIGNATURE OF ATTORNEY OF RECORD William M. Katz, Jr.

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
- (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
- (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
 United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.
 United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
 Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
 Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- V. Origin.** Place an "X" in one of the seven boxes.
 Original Proceedings. (1) Cases which originate in the United States district courts.
 Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441. When the petition for removal is granted, check this box.
 Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
 Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
 Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
 Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.
 Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.
PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7. Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
 Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
 Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

Date and Attorney Signature. Date and sign the civil cover sheet.

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS

AUSTIN

DIVISION

Supplement to JS 44 Civil Cover Sheet
Cases Removed from State District Court

This form must be filed with the Clerk's Office no later than the **first business day** following the filing of the Notice of Removal. Additional sheets may be used as necessary.

The attorney of record for the removing party **MUST** sign this form.

STATE COURT INFORMATION:

1. Please identify the court from which the case is being removed; the case number; and the complete style of the case.

"Melanie Mock, Individually and on Behalf of All Others Similarly Situated v. St. David's Healthcare Partnership, L.P., LLP," Cause No. D-1-GN-19-002790, in the 419th District Court of Travis County, Texas.

2. Was jury demand made in State Court? Yes No

If yes, by which party and on what date?

Party Name

Date

STATE COURT INFORMATION:

1. List all plaintiffs, defendants, and intervenors still remaining in the case. Also, please list the attorney(s) of record for each party named and include the attorney's firm name, correct mailing address, telephone number, and fax number (including area codes).

See attached.

2. List all parties that have not been served at the time of the removal, and the reason(s) for non-service.

None.

3. List all parties that have been non-suited, dismissed, or terminated, and the reason(s) for their removal from the case.

None.

COUNTERCLAIMS, CROSS-CLAIMS, and/or THIRD-PARTY CLAIMS:

1. List separately each counterclaim, cross-claim, or third-party claim still remaining in the case and designate the nature of each such claim. For each counterclaim, cross-claim, or third-party claim, include all plaintiffs, defendants, and intervenors still remaining in the case. Also, please list the attorney(s) of record for each party named and include the attorney's firm name, correct mailing address, telephone number, and fax number (including area codes).

None.

VERIFICATION:

/s/ William M. Katz, Jr.

Attorney for Removing Party

June 13, 2019

Date

Defendant St. David's Healthcare Partnership, L.P., LLP

Party/Parties

State Court Information – Parties and Counsel

Plaintiffs

Melanie Mock, on behalf of herself and all others
similarly situated

Plaintiffs' Counsel

Daniel E. Blumberg
Daniel@blumbergbagley.com
Peter Bagley
Peter@blumbergbagley.com

Blumberg Bagley PLLC
2304 Interstate 20 West, Suite 190
Arlington, TX 76017
Telephone: (817) 277-1500
Facsimile: (817) 277-1170

Barry L. Kramer
kramerlaw@aol.com

Law Office of Barry Kramer
9550 S. Eastern Avenue, Suite 253
Las Vegas, NV 89123
Telephone: (702) 778-6090
Facsimile: Unlisted/unknown

Defendant

St. David's Healthcare Partnership, L.P., LLP

Defendant's Counsel

J. Patrick Bredehoff
Patrick.Bredehoff@tklaw.com
William M. Katz, Jr.
William.Katz@tklaw.com

THOMPSON & KNIGHT LLP
1722 Routh Street, Suite 1500
Dallas, TX 75201
Telephone: (214) 969-1700
Facsimile: (214) 969-1751

ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [St. David's Healthcare Partnership Facing Class Action Over 'Undisclosed' Emergency Room Fees](#)
