

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

WELLPATH HOLDINGS, INC. et al.,¹

Debtors.

)
) Chapter 11
)

) Case No. 24-90533 (ARP)
)
)

**OBJECTION OF CERTAIN CLAIMANTS TO JOINT EMERGENCY MOTION FOR
CONTINUANCE OF HEARING ON THE DEBTOR’S STAY EXTENSION MOTION
AND PC MOTION**

The plaintiffs in the Lawsuits reflected in **Exhibit A** (the “Claimants”) hereby object to Joint Emergency Motion for Continuance of Hearing on the Debtor’s Stay Extension Motion and PC Motion (the “Motion”) as follows:

1. The automatic stay has been inappropriately extended for sixty (60) days without an opportunity to be heard.² The hearing on the Stay Extension Motion has been continued twice before, both times without the opportunity for the Claimants to be heard. This has crossed the line into abuse of the first-day hearing process.

2. The purported justification—to address the Committee’s objections—is lacking. The Committee represents the interests of creditors in the abstract. The Claimants are directly affected. There cannot be a settlement between the Committee and the Debtors that resolves the issue. It is a complete waste of time.

3. Working toward a “Stay Determination Process” with the Committee is similarly misguided. The Claimants have not consented to the Committee having a say in whether the stay

¹ A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://dm.epiq11.com/Wellpath>.

² While the undersigned attended the first-day hearings, the Court did not unmute the line to allow him to raise an objection and alert the Court to the Debtors’ misrepresentations about the relief sought.

applies to non-debtor defendants in their lawsuits. That is for the Court to decide, and it has been set for hearing on January 14, 2025, for more than a month. Further, it contemplates impermissibly shifting the burden to the Claimants when it is the Debtors who must establish to the Court that the stay should be extended beyond what the statute says.

4. For those and other reasons to be argued at the hearing on the Motion, the Court should deny the Motion and go forward with the hearings on the Stay Motion and Professional Corporation Motion as scheduled.

Dated: January 14, 2025

SHANNON & LEE LLP

/s/ R. J. Shannon

R. J. Shannon

State Bar No. 24108062

2100 Travis Street, STE 1525

Houston, Texas 77002

Tel. (713) 714-5770

rshannon@shannonleellp.com

*Bankruptcy Co-Counsel to the Claimants for the
Limited Purpose of Responding to the Stay Motion*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served (a) by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas on all parties registered to receive such service in the above captioned case and (b) by separate email on the following:

mheld@mwe.com; fperلمان@mwe.com; bgiordano@mwe.com; jjumbeck@mwe.com;
cwurzelbacher@mwe.com; sszanzer@mwe.com; cdingman@mwe.com; nicholas.zluticky@stinson.com;
zachary.hemenway@stinson.com; lucas.schneider@stinson.com

/s/R. J. Shannon

R. J. Shannon

EXHIBIT A**Claimants' Lawsuits**

<i>Case Name & No.</i>	<i>Defendants (In Order of Reference)</i>	<i>Causes of Action/Counts (In Order of Reference)</i>
A.G. v. Tulare County, et al., 1:23-cv-00500-JLT-SKO (E.D. Cal.).	<ol style="list-style-type: none"> 1. County of Tulare 2. Jose Sanchez Perez (Correctional Deputy Trainee) 3. James Dillon (Correctional Deputy) 4. Rodrigo Deochoa (Correctional Deputy) 5. Andrew P. Ho, MD 6. Alla Liberstein, MD 7. Does 7-50 	<ol style="list-style-type: none"> 1. 42 U.S.C. § 1983 –Civil Rights Violations 2. 42 U.S.C. § 1983 – <i>Monell</i> and Supervisory Liability 3. California Civil Code § 52.1 (b) – State Civil Rights Violations 4. Negligence
Alameda County Male Prisoners, et al. v. Alameda County Sheriff's Office, et al., Case No. 3:19-cv-07423-JSC (N.D. Cal.).	<ol style="list-style-type: none"> 1. Alameda County Sheriff's Office 2. Alameda County 3. Deputy Joe 4. Deputy Ignont (Sp) 5. John And Jane Roes, Nos. 1 – 25 6. Well-Path Management, Inc. 7. Aramark Correctional Services, LLC 	<ol style="list-style-type: none"> 1. Deprivation of Federal Civil Rights under 42 U.S.C. § 1983— Fourteenth Amendment—Sufficient Unspoilt, Food Necessary to Sustain Health 2. Deprivation of Federal Civil Rights under 42 U.S.C. § 1983— Eighth Amendment—Sufficient, Non-Contaminated, Food Necessary to Sustain Health 3. Deprivation of Federal Civil Rights under 42 U.S.C. § 1983— Fourteenth Amendment—Medical Services 4. Deprivation of Federal Civil Rights under 42 U.S.C. § 1983— Eighth Amendment—Medical Services 5. Deprivation of Federal Civil Rights under 42 U.S.C. § 1983— Fourteenth Amendment—Adequate Sanitation 6. Deprivation of Federal Civil Rights under 42 U.S.C. § 1983— Eighth Amendment—Adequate Sanitation 7. Deprivation of Federal Civil Rights under 42 U.S.C. § 1983— First Amendment
Balliet v. Luzerne County et al., Case No. 3:22-cv-02032 (M.D. Penn.).	<ol style="list-style-type: none"> 1. Luzerne County 2. Wellpath, LLC 3. Chris Gale 4. Holly Green 	<ol style="list-style-type: none"> 1. 42 U.S.C. § 1983—Denial of Medical Care (Individual Medical Defendants) 2. 42 U.S.C. § 1983—Denial of Medical Care (County & Wellpath)

	<ul style="list-style-type: none"> 5. Nelson Iannuzzi 6. Jade Talarico 7. T.J. Brown 8. William Wilk 9. LPN Biane Emmett 10. C.O. Robert Calvey 11. LT. Kate Romiski 12. C.O. William Wilk 13. Cheri Steever 14. Carleen Kendig 15. Donald Fuller 16. Nancy Soers 17. Shana Feichter 	<ul style="list-style-type: none"> 3. 42 U.S.C. § 1983—Denial of Medical Care (Lieutenant & Correctional Officers) 4. State Law Negligence—Individual Wellpath Defendants 5. State Law Negligence—State Law Negligence (Vicarious)
Beckner v. County of Santa Cruz, et al., Case No. 5:23-cv-05032-BLF (N.D. Cal.).	<ul style="list-style-type: none"> 1. County of Santa Cruz 2. California Forensic Medical Group 3. Wellpath, Inc. 4. Wellpath, LLC 5. Wellpath, Management 6. James Hart 7. Sarah Hewitt 8. Santa Cruz Sheriff's Correction Officer Joshua Johnson 9. Santa Cruz Sheriff's Correction Officer Buchanan 10. Does 5-20 	<ul style="list-style-type: none"> 1. Violation of Due Process/Deliberate Indifference to Serious Medical Needs (42 U.S.C. § 1983) 2. Failure to Properly Train (42 U.S.C. §1983) 3. Failure to Properly Supervise and Discipline (42 U.S.C. §1983) 4. <i>Monell</i> Policy, Pattern and Practice (42 U.S.C. §1983) 5. Wrongful Death (CCP §377.60, et seq.) 6. Bane Act (CCP §52.1)
Brazelton v. Wellpath et al., Case No. 1:22-cv-01324 (C.D. Ill.).	<ul style="list-style-type: none"> 1. Wellpath, LLC 2. Chris Watkins (Sheriff of Peoria Cnty) 3. Susan Brobston 4. Sally Foley 5. Shamaila Gorski 6. Carrie Joanne Roe 7. Jana Huston 	<ul style="list-style-type: none"> 1. 42 U.S.C. § 1983 – Failure to Provide Medical Care (All Individual Defendants) 2. 42 U.S.C. § 1983 – Failure to Intervene (All Individual Defendants) 3. 42 U.S.C. § 1983 – <i>Monell</i> Claims (Wellpath and Chris Watkins) 4. State Law Negligence (All Defendants) 5. Respondeat Superior (Wellpath)

	<ol style="list-style-type: none"> 8. Patricia Rice 9. Erin O'Malley 10. Susan Gilles 11. Emily Dawson 12. Lisa Stout 13. Michelle Newman 14. Morgan Renee Abraham 15. Patrica Eddlemon 16. Brittany Vanfleet 17. Deandra Snoddy 18. Peoria County 	<ol style="list-style-type: none"> 6. State Law Indemnification (Peoria County)
Bush et al. v. Luzerne County et al., Case No. 23-cv-01152 (M.D. Penn.).	<ol style="list-style-type: none"> 1. Luzerne County 2. Mark Rockovich 3. Wellpath, LLC 4. Christopher Gale 5. Elizabeth Anselm 6. Joseph Delany 7. Melissa Yankovich 8. Harry Reese 9. Heather Wilson 	<ol style="list-style-type: none"> 1. 42 U.S.C. § 1983—Eighth/Fourteenth Amendments (Deliberate Indifference, Vulnerability to Suicide) 2. 42 U.S.C. § 1983—Eighth/Fourteenth Amendments (Deliberate Indifference, Inadequate Medical Care) 3. Americans with Disabilities Act 4. Rehabilitation Act 5. 42 U.S.C. § 1983—Eighth/Fourteenth Amendments (Deliberate Indifference, Vulnerability to Suicide) 6. 42 U.S.C. § 1983—Eighth/Fourteenth Amendments (Deliberate Indifference, Inadequate Medical Care)
Capaci v. CO Dasraj, et al., Case No. 7:24-cv-4626 (PMH) (S.D.N.Y.).	<ol style="list-style-type: none"> 1. Cyrel Dasraj (C.O.) 2. County of Orange 3. Teneshia Washington, RN 4. Wellpath, LLC 5. Wellpath NY, LLC 6. John and Jane Doe #1-10 	<ol style="list-style-type: none"> 1. 42 U.S.C. § 1983— Deliberate Indifference to Serious Medical Need (CO Dasraj and Nurse Washington) 2. 42 U.S.C. § 1983—Municipal Liability (County of Orange) 3. 42 U.S.C. § 1983—Municipal Liability (Wellpath LLC and Wellpath NY LLC) 4. Medical Malpractice (County of Orange, Wellpath, and Nurse Washington) 5. Negligence (County of Orange and CO Dasraj) 6. Negligence Hiring, Training, and Supervision (County of Orange and Wellpath) 7. Wrongful Death (All Defendants)

C.R.A et al. v. Fresno County et al., Case No. 2:23-00672 (E.D. Cal.).	<ol style="list-style-type: none"> 1. Fresno County 2. Fresno County Sheriff's Department 3. Wellpath LLC 4. Does 1-25 	<ol style="list-style-type: none"> 1. Failure to Provide Medical Care, Fourteenth Amendment Violation (42 U.S.C. § 1983) 2. Failure to Protect from Harm, Fourteenth Amendment Violation (42 U.S.C. § 1983) 3. Deprivation of Substantive Due Process, First and Fourteenth Amendment Violation (42 U.S.C. § 1983) 4. Negligent Supervision, Training, Hiring, Retention (County of Fresno) 5. Negligent Supervision, Training, Hiring, Retention (Wellpath) 6. Wrongful Death 7. State Civil Rights Violation (Cal. Civ. Code § 52.1) 8. Survivorship Action and Request for Punitive Damages
Curtis v. Lackawanna County et al., Case No. 3:23-cv-02092-JFS (M.D. Penn.).	<ol style="list-style-type: none"> 1. Lackawanna County 2. Wellpath, LLC 3. Haseebuddin Ahmed, M.D. 4. Nelson Iannuzzi 5. Rae Olivia 6. June Mahoney 7. Stephanie Wayman 8. India Smith 9. Kimberly Peterson 10. Alexandria Geisler 11. Angela Furman 12. C.O. Burda 13. C.O. Houman 14. C.O. Wharton 15. C.O. Jonas 16. C.O. Kelly 17. C.O. Kopa 18. C.O. Bloom 19. C.O. Loven 20. Sgt. Dranchak 21. Sgt. Mills. 	<ol style="list-style-type: none"> 1. 42 U.S.C. § 1983—Denial of Medical Care (Individual Medical Defendants) 2. 42 U.S.C. § 1983—Denial of Medical Care (Individual Officer Defendants) 3. 42 U.S.C. § 1983—Denial of Medical Care (Lackawanna County and Wellpath) 4. Negligence—Wellpath and Nurse Iannuzzi 5. Negligence—Wellpath and Dr. Ahmed 6. Negligence—Wellpath 7. Negligence—Nurse Iannuzzi 8. Negligence—Dr. Ahmed

	22. C.O. Burrier 23. Sgt. Trichilo 24. C.O. Tavares 25. C.O. Wesley 26. C.O. Posluszny 27. C.O. Dixon 28. C.O. Moskwa 29. C.O. Jackson	
Desir v. Sheriff Gregory Tony et al., Case No. 0:23-cv-60499 (S.D. Fla.).	1. Sheriff Gregory Tony 2. Ryan Daniel 3. Angela McNeal 4. Kimberly Green 5. Christopher Williams 6. Devon Parker 7. Jeremiah Howard 8. Wellpath LLC 9. Wellpath Management, Inc. 10. Etude Petit-Homme Datus 11. Leon Tennant 12. Veronica Edwards 13. Rio Flemming	1. 42 U.S.C. § 1983 – Fourteenth Amendment – Use of Excessive Force 2. 42 U.S.C. § 1983 – Fourteenth Amendment – Use of Excessive Force 3. 42 U.S.C. § 1983 – Fourteenth Amendment – Failure to Intervene 4. 42 U.S.C. § 1983 – Fourteenth Amendment – Use of Excessive Force 5. 42 U.S.C. § 1983 – Fourteenth Amendment – Deliberate Indifference to Serious Medical Needs 6. 42 U.S.C. § 1983 – Fourteenth Amendment – Deliberate Indifference to Serious Medical Needs 7. 42 U.S.C. § 1983 – Fourteenth Amendment – Deliberate Indifference to Serious Medical Needs 8. 42 U.S.C. § 1983 – Fourteenth Amendment – Deliberate Indifference to Serious Medical Needs 9. 42 U.S.C. § 1983 – Fourteenth Amendment – Failure to Train 10. 42 U.S.C. § 1983 – Fourteenth Amendment – Failure to Supervise and Discipline 11. 42 U.S.C. § 1983 – Fourteenth Amendment – Supervisor Liability 12. 42 U.S.C. § 12101 – The Americans with Disabilities Act 13. Section 504 of the Rehabilitation Act 14. Fla. Stat. §§ 768.16-.26 and 768.28 – Wrongful Death

Esparza v. Wellpath, LLC et al., 23-cv-02161-JCM-VCF (D. Nev.).	<ol style="list-style-type: none"> 1. Wellpath, LLC 2. Las Vegas Metropolitan Police Department 3. Kevin McMahonill 4. Fred Haas 5. Brian Fucile 6. Scott Zavsza 7. Leah Anderson 8. Alyssa Williams 9. Julian Abram 10. Douglas Thrasher 11. Larry Williamson 12. Catherine Ryan 13. Jessica Arabski 14. Richard Medrano 15. Vivek Shah 16. Cole Casey 17. Kesha Poland 18. Maria Hopkins 19. Rachel Clark 20. Kyle Martineau 21. Earl Salviejo 22. Ulyana Biloskurska 23. Amy Kathryn Anapolsky 24. Does 1-10 25. Fernando Martinez Santos (Nominal) 	<ol style="list-style-type: none"> 1. Deliberate Indifference to Serious Medical Needs (42 U.S.C. § 1983; Nevada Constitution, Article 1, § 8) 2. Deprivation of Familial Association (42 U.S.C. § 1983; Nevada Constitution, Article 1, § 8) 3. Overdetention (42 U.S.C. § 1983; Nevada Constitution, Article 1, § 8) 4. Municipal Liability, Failure to Train/Policy and Custom (42 U.S.C. § 1983) 5. Disability Discrimination (42 U.S.C. § 12131 et seq.; 29 U.S.C. § 794 (A)) 6. Wrongful Death (Nevada State Law) 7. Negligence of a Vulnerable Person (Nevada State Law)
Fahrni et al. v. Tulare County, et al., 1:23-cv-01265-KES-SAB (E.D. Cal.).	<ol style="list-style-type: none"> 1. County of Tulare 2. Adolfo Gallardo, Jr. 3. Salvador Santillan 4. Anyval Suarez 5. Wellpath, LLC 6. Alla Liberstein, MD 	<ol style="list-style-type: none"> 1. 42 U.S.C. § 1983 – Civil Rights Violations 2. 42 U.S.C. § 1983 – <i>Monell</i> and Supervisory Liability 3. California Civil Code § 52.1 (b) – State Civil Rights Violations 4. Negligence

	<ol style="list-style-type: none"> 7. Precision Psychiatric Services, Inc. 8. Anthony Ceja, AMFT 9. Sureshababu Kurra, MD 10. Does 6–50 	
Hirsch v. Will County, et al., Case No. 19-CV-7398 (N.D. Ill.).	<ol style="list-style-type: none"> 1. Will County 2. Sheriff Mike Kelley 3. Officer Frederick Abdullah 4. Officer Derek Coppes 5. Officer Edward Hayes, Jr. 6. Officer Villegas 7. Officer Desadier 8. Officer Nathan Little 9. Officer Charles Kavanaugh 10. Erica Wuensen-Diez 11. Correct Care Solutions, Inc. 12. Wellpath LLC, 13. Penelope Johnson 14. Cindy Smith 15. Guadalupe Zuniga 16. Olivia Simpri-Mensah 17. Young Sun Kim 18. Kia Green 19. Amanda North-Shea 20. Carmina Feliciano 21. Carmina Shaw 22. Corina Shaw 23. Deatrice Black 24. Molly Weigel 25. Dona Petruskis 26. Tiffany Utke 27. Mohammed Ibrahim 28. Patricia Loparco 	<ol style="list-style-type: none"> 1. 42 U.S.C. §1983—Due Process claim 2. 42 U.S.C. §1983, <i>Monell</i> claim—Defendant Sheriff 3. 42 U.S.C. §1983, <i>Monell</i> policy claim—Defendant Wellpath 4. 42 U.S.C. §12101, et seq., Americans with Disabilities Act—Will County 5. 42 U.S.C. §12101, et seq., Americans with Disabilities Act—CCS/Wellpath 6. 740 ILCS 180/1 et seq., Illinois Wrongful Death 7. Illinois Survival Claim – Willful and Wanton Claim 8. Illinois Survival Claim, Intentional Infliction of Emotional Distress 9. State Law Claim for Medical Malpractice—Defendants Kim and Simpri-Mensah

	29. Sheila Corrigan 30. Jeffrey Saffold	
Johnston et al. v. County of Ventura, et al., 2:23-cv-05902 (C.D. Cal.).	1. County of Ventura 2. Ventura County Sheriff's Office 3. Sheriff Bill Ayub 4. Wellpath Management Inc., 5. Wellpath LLC, 6. Commander Mike Hartmann, 7. Deputy Spencer Iwansky, 8. Deputy John Ennis 9. Health Services Administrator Leah James, R.N. 10. John Riggs, M.D. 11. Sylvia Meza, R.N. 12. Griselda Beauvais, R.N., 13. Jennifer Alvarez, R.N. 14. Jessica Melger, LVN 15. Does 1 through 10	1. Failure to Protect from Harm, Fourteenth Amendment Violation (42 U.S.C. § 1983) 2. Failure to Provide Medical Care, Fourteenth Amendment Violation (42 U.S.C. § 1983); 3. Deprivation of the Right to Familial Relationship with Decedent (42 U.S.C. § 1983); 4. Policies, Customs, Practices Causing Constitutional Violations (<i>Monell</i> , 42 U.S.C. § 1983); 5. Supervisory Liability Causing Constitutional Violations (Failure to Properly Train, Supervise and Discipline, 42 U.S.C. § 1983); 6. Negligence – Wrongful Death; 7. Negligence – Medical Malpractice; 8. Violation of California Government Code §845.6; 9. Violation of California Civil Code §52.1 (Tom Bane Act)
J.S. et al. v. County of Fresno et al., Case No. :23-cv-01070-NODJ-EPG (N.D. Cal.).	1. County of Fresno 2. Fresno County Sheriff's Office Employees Does 1-30 3. Wellpath LLC 4. Jessica Martinez, LMFT 5. Does 33-50 6. Does 51-70	1. 42 U.S.C. § 1983—Civil Rights Violations 2. 42 U.S.C. § 1983 – <i>Monell</i> and Supervisory Liability 3. California Civil Code § 52.1 (b) –State Civil Rights Violations 4. Negligence
K.C. et al. v. Alameda County, et al., 4:22-cv-01817-DMR (N.D. Cal.).	1. County of Alameda 2. Gregory J. Ahern 3. Karyn L. Tribble 4. Rinata Wagle, M.D. 5. Zazi Morsell, R.N. 6. Jennifer L. Sells 7. Marc R. Solopow	1. 42 U.S.C. § 1983 Fourteenth Amendment—Deliberate Indifference to Serious Medical Needs/Failure to Protect 2. 42 U.S.C. § 1983 First and Fourteenth Amendments—Interference with Familial Association 3. 42 U.S.C. § 1983— <i>Monell</i> Liability 4. 42 U.S.C. § 1983—Supervisory Liability 5. Violation of Civil Code § 52.1—Bane Act

	8. Leslie A. Gerbacio, 9. Prentice J. Howard 10. Reginal D. Aaron 11. Ruben Pola 12. Napoleon M. Terrell 13. Wellpath, LLC 14. Kerry-Ann Kelly, M.D., 15. Janet Robinson 16. Maria Magat, M.D. 17. Szilvia Molitorisz, M.D. 18. Gabriele Quaglia, R.N., 19. Evelyn Hirsch, R.N.; 20. Stella Lewis, R.N. 21. Rajbinder Mand, L.V.N. 22. Felicidad C. Ramilo, L.V.N. 23. Cella Barron, R.N. 24. Harvin Ferrer, R.N. 25. Rosalyn Williams, L.V.N. 26. Chisa Earl, L.V.N. 27. Hector Luz, R.N. 28. Harpreet K. Sidhu, L.V.N. 29. Jharana Shreesh, R.N. 30. H. Singh, R.N. 31. Michell Tadeo, L.V.N. 32. Does 1-30	6. Negligence—Wrongful Death and Survival Claim
Laurel v. County of Alameda, et al., Case No. 3:24-cv-04427 (N.D. Cal.).	1. County of Alameda 2. Yesenia Sanchez 3. Wellpath, LLC 4. Asaad Traina, M.D. 5. Adiam Haile, R.N. 6. Shelby Moore, R.N. 7. Homayun Saleh, P.A.	1. 42 U.S.C. § 1983 14th Am.—Deliberate Indifference to Serious Medical Needs (Traina, Haile, Moore, Saleh, Karim, Brown, and Does 1-30) 2. 42 U.S.C. § 1983 14th Am.—Interference with Familial Association (Traina, Haile, Moore, Saleh, Karim, Brown, and Does 1-30) 3. 42 U.S.C. § 1983 14th Am.— <i>Monell</i> Liability (County and Wellpath)

	<ol style="list-style-type: none"> 8. Laila Karim, R.N. 9. K. Brown, R.N. 10. Does 1-30 	<ol style="list-style-type: none"> 4. Violation of Civil Code § 52.1 – Bane Act (County, Wellpath, Traina, Haile, Moore, Saleh, Karim, Brown, and Does 1-30) 5. Negligence—Wrongful Death and Survival Claim (County and Does 1-30)
Magana v. County of Alameda et al., 24-cv-04716-JD (N.D. Cal.).	<ol style="list-style-type: none"> 1. County of Alameda 2. Alameda County Sheriff’s Office 3. Yesenia Sanchez 4. Erik Baker 5. Zachary Tsanglee 6. Peter Candelario 7. California Forensic Medical Group 8. Rajendra Mahajan 9. Sumeet Chagger 10. Harpreet Hundal 11. Doe 1 to 20, 	<ol style="list-style-type: none"> 1. U.S. Const. Amend. XIV; 42 U.S.C. § 1983—Deliberate Indifference/Special Relationship 2. Title II of the Americans with Disabilities Act; 42 U.S.C. § 12101, et seq. 3. Section 504 of the Rehabilitation Act; 29 U.S.C. § 701, et seq. 4. Failure to Summon Medical Care; Cal. Gov. Code § 845.6 5. California Public Records Act; Cal. Gov. Code § 7920.000 et seq. 6. Failure to Produce Patient Records; Cal. Evid. Code § 1158 7. Tom Bane Civil Rights Act; Cal. Civ. Code § 52.1 8. Intentional Infliction of Emotional Distress 9. Negligence
McCullough v. Clinton County et al., Case No. 4:23-cv-00171 (M.D. Penn.).	<ol style="list-style-type: none"> 1. Clinton County 2. Wellpath, LLC 3. Jeremy Shank 4. Lieutenant Muthler 5. Officer Etters 6. Iantha King 7. Officer Young 8. William Detterline 9. Christina Mazzulla 10. Supplemental Health Care Services, Inc. 	<ol style="list-style-type: none"> 1. 42 U.S.C. § 1983—Fourteenth Amendment Deliberate Indifference 2. 42 U.S.C. § 1983—Fourteenth Amendment Deliberate Indifference 3. Americans with Disabilities Act (Title II) 4. Rehabilitation Act 5. 42 U.S.C. § 1983—Fourteenth Amendment State-Created Danger
Mohrbacher, et al. v. Alameda County Sheriff’s Office, et al., 3:18-cv-00050-JD (N.D. Cal.).	<ol style="list-style-type: none"> 1. Alameda County Sheriff’s Office 2. Gregory J. Ahern 3. Brett M. Keteles 4. Tom Madigan, 5. T. Pope 6. T. Russell 	<ol style="list-style-type: none"> 1. 42 U.S.C. § 1983—Deprivation of Federal Civil Rights (Alameda County Sheriff’s Office) 2. 42 U.S.C. § 1983—Deprivation of Federal Civil Rights (Against CFMG/Wellpath) 3. 42 U.S.C. § 1983—Deprivation of Federal Civil Rights (Against Alameda County Sheriff’s Office and Aramark)

	<ol style="list-style-type: none"> 7. D. Skoldqvist 8. Lt. Hattaway 9. Sgt. Calagari 10. Deputy Divine (#512) 11. Deputy Debra Farmanian 12. Deputy Weatherbee (#238) 13. Deputy Tania Pope 14. Deputy Winstead 15. Deputy Caine 16. Alameda County 17. John & Jane Does, Nos. 1 – 50 18. California Forensic Medical Group, its employees and subcontractors, and Rick & Ruth Roes Nos. 1-50 19. Aramark Correctional Services, LLC, its employees and sub-contractors, and Rick and Ruth Roes Nos. Nos. 1-50 	<ol style="list-style-type: none"> 4. Article I, Section 17 of the California Constitution—Deprivation of Rights (All Defendants) 5. Article I, Section 17 of the California Constitution—Deprivation of Rights (Alameda County and Alameda County Sheriff's Office)
Moone v. Board of County Commissioners of the County of San Juan et al., Case No. 1:21-cv-01130 (D. N.M.).	<ol style="list-style-type: none"> 1. Board of County Commissioners ff The County of San Juan 2. Daniel Webb 3. Thomas Wilson 4. Jorge Rodriguez 5. Bryan Banyacya 6. Wellpath, LLC 7. Susan Long 	<p><u>Generally:</u> 42 USC § 1983, the New Mexico Tort Claims Act, the Americans with Disabilities Act, and the Constitution of the United States</p> <ol style="list-style-type: none"> 1. Violation of Procedural Due Process (Webb) 2. Inhumane Conditions of Confinement/ Inadequate Medical Care in Violation of the Fourteenth Amendment (All Defendants) 3. Negligent Provision of Medical Care (Wellpath and Long) 4. Violation of Fourteenth Amendment – Excessive Force (Banyacya, Rodriguez, and Wilson) 5. Battery (Banyacya, Rodriguez, and Wilson) 6. Violation of the Americans with Disabilities Act (Board of County Commissioners, and Webb) 7. Custom and Policy of Violating Constitutional Rights (Official Capacity Defendants)

O'Neil v. Las Vegas Metropolitan Police Department et al., Case No. 2:22-cv-00474-ART-NJK (D. Nev.)	<ol style="list-style-type: none"> 1. Las Vegas Metropolitan Police Department 2. County of Clark 3. Clark County Detention Center 4. Sheriff Joe Lombardo, 5. Wellpath, LLC 6. Doe Nurse Coco 7. Doe Officers 1 through 10, 8. Doe Nurses 1 through 10, 9. Does 1 through 10 10. Roe Corporations 11 through 20; 11. ABC Limited Liability Companies 21 through 30 	<ol style="list-style-type: none"> 1. 42 U.S.C. § 1983 2. 42 U.S.C. § 1983—Violation of Eighth Amendment to the United States Constitution (Cruel and Unusual Punishment) 3. Negligence 4. Violation of Plaintiffs Civil Rights—<i>Monell</i> Liability for Failure to Train 5. Violation of Plaintiffs Civil Rights—<i>Monell</i> Liability for Failure to Train 6. Violations of the Constitution of the State of Nevada 7. Negligent Hiring, Training, Supervision and Retention 8. Concert of Action against all Defendants 9. Negligent Infliction of Emotional Distress
Ontiveros v. Bd. of Cnty. Comm'rs of San Juan, et al., Case No. D-1116-CV-2023-01315 (11th Judicial District Court for N.M.).	<ol style="list-style-type: none"> 1. Board of County Commissioners of the County of San Juan 2. John Does 1-5 3. Wellpath, LLC 4. Mya Donaldson 	<p><u>Generally:</u> New Mexico Tort Claims Act and New Mexico Civil Rights Act</p> <ol style="list-style-type: none"> 1. Negligent Provision of Medical Care (Wellpath and Mya Donaldson) 2. Negligent Maintenance of a Medical Facility (Board of Commissioners) 3. Negligent Operation and Maintenance of a Building (Board of Commissioners) 4. Violation of the New Mexico Constitution—Cruel and Unusual Punishment (John Does 1-5) 5. Violations of the New Mexico Constitution (Board of Commissioners)
Polachek v Luzerne County et al., Case No. 23-cv-01545 (M.D. Penn.).	<ol style="list-style-type: none"> 1. Luzerne County 2. Mark Rockovich 3. Wellpath, LLC 4. Tamra J. Roper 5. Joell Petrovich 6. Mike Chudoba 7. Kelsey Chambers 8. Jodi Hall 	<ol style="list-style-type: none"> 1. 42 U.S.C. § 1983—Eighth/Fourteenth Amendments, Deliberate Indifference, Vulnerability to Suicide (County, Rockovich, Wellpath) 2. 42 U.S.C. § 1983—Eighth/Fourteenth Amendments, Inadequate Medical Care (County, Rockovich, Wellpath) 3. Americans with Disabilities Act (Title II) (County) 4. Rehabilitation Act (County) 5. 42 U.S.C. § 1983—Eighth/Fourteenth Amendments, Deliberate Indifference, Vulnerability to Suicide (Officers

	9. Katie Hermanoski 10. Heather Wilson 11. Elizabeth Anselm	Roper, Petrovich, Chudoba, Hall & Wilson; Ms. Chambers & Ms. Hermanoski) 6. 42 U.S.C. § 1983—Eighth/Fourteenth Amendments, Inadequate Medical Care (Ms. Anselm)
Pugh v. Wellpath, et al., 3:23-cv-03677-CRB (N.D. Cal.).	1. Wellpath, LLC 2. Dinesh Nagar, MD 3. Don Purcell, MD 4. John Maike, MFT 5. Jordan Alarcon, RN 6. County of Solano 7. Sheriff Thomas A. Ferrara 8. Sgt. Joshua Esquibel 9. Officer Raymond Johnson, 10. Officer Ricky Perez 11. Officer Roberto Valdez 12. Does 5–50	1. 42 U.S.C. § 1983 (Nagar, Purcell, Maike, Alarcon, Esquibel, Johnson, Perez, Valdez, and Does 5–30) 2. 42 U.S.C. § 1983 – <i>Monell</i> and Supervisory Liability (Wellpath, Nagar, Purcell, Esquibel, County, Ferrara, And Does 31–50) 3. Violation of California Civil Code § 52.1 (B) – Bane Act (Nagar, Purcell, Maike, Alarcon, Esquibel, Johnson, Perez, Valdez and Does 5–50) 4. Negligence (Esquibel, Johnson, Perez, Valdez, and Does 5–50)
Reynolds et al. v. County of Madera et al., Case No. 1:23-cv-00538 (E.D. Cal.).	1. County of Madera 2. Does 1-25 3. Wellpath, LLC 4. Jennifer Lorin Johnson (Nominal Defendant) 5. Does 26-50	1. 42 U.S.C. § 1983 – Civil Rights Violations 2. 42 U.S.C. § 1983 – <i>Monell</i> and Supervisory Liability 3. California Civil Code § 52.1 (b) – State Civil Rights Violations Negligence
Roberts et al. v. Wellpath et al., Case No. 3:23-cv-03662 (N.D. Cal.).	1. Wellpath, LLC 2. Dinesh Nagar, M.D. 3. Donald Purcell, M.D. 4. Erin Estes, L.P.N. 5. John Maike, M.F.T. 6. County of Solano 7. Jonathan Benton 8. Karina Wilson 9. Does 1-70	1. 42 U.S.C. § 1983 – Federal Civil Rights Violations 2. 42 U.S.C. § 1983 – Monell and Supervisory Liability 3. California Civil Code § 52.1 (b) – State Civil Rights Violations 4. California Government Code § 845.6 – Failure to Summon Medical Care 5. Negligence

Rodriguez-Gonzalez et al. v. County of Santa Barbara et al., 2:24-cv-04685-ODW-E (C.D. Cal.).	<ol style="list-style-type: none"> 1. County of Santa Barbara 2. Shawn Lammer 3. Deputy John Hartly Freedman 4. Cottage Health System 5. Santa Barbara Cottage Hospital 6. Goleta Valley Cottage Hospital 7. Brett Wilson, M.D. 8. Wellpath Inc. 9. Wellpath Management, Inc. 10. Wellpath, LLC 11. California Forensic Medical Group, Inc. 12. Jayna Liford 13. Kathleen McElroy 14. Hanna Fordahl 15. Caleb Tammar 	<ol style="list-style-type: none"> 1. 42 U.S.C. § 1983 – Deliberate Indifference 2. 42 U.S.C. § 1983 – Failure to Train/Supervise 3. 42 U.S.C. § 1983 – <i>Monell</i> 4. California Govt Code §845.6 – Failure to Summon Medical Care 5. Negligence 6. Medical Negligence 7. Substantive Due Process 8. Medical Negligence
Smith et al. v. County of Santa Cruz, et al., Case No. 5:21-cv-00421 (N.D. Cal.).	<ol style="list-style-type: none"> 1. County of Santa Cruz 2. Sheriff James Hart 3. California Forensic Medical Group 4. Wellpath, LLC 5. Gerald Lazar, M.D. 6. Does 4-50 	<ol style="list-style-type: none"> 1. Deliberate Indifference to Serious Medical Need (42 U.S.C. §1983) 2. Right of Association (42 U.S.C. §1983) 3. Violation of 42 U.S.C. §1983 4. <i>Monell</i> (42 U.S.C. §1983) 5. Wrongful Death (CCP §377.60) 6. Negligence 7. ADA—42 U.S.C. §12132 8. 29 U.S.C. §794(a)
Smith et al. v. Bains et al., Case No. 24-cv-02102-TWT (N.D. Ga.).	<ol style="list-style-type: none"> 1. Stacey Bains 2. Kara Padgett 3. Amanda Brown 4. Stacey Kelly 5. Octavia Keitt 6. Daniele Cathey 7. Jeronia Bowden 	<ol style="list-style-type: none"> 1. Deliberate indifference to serious risk of harm (Kelly and Keitt) 2. Violation of Ga. Const., art. I, § II, ¶ IX (d) (Kelly and Keitt) 3. Ga. Const., art. I, § II, ¶ IX (d) (Cathey) 4. Ga. Const., art. I, § II, ¶ IX (d) (Brown) 5. Deliberate indifference/Fourteenth Amendment (Padgett) 6. Deliberate indifference/Fourteenth Amendment (Bains)

	<ol style="list-style-type: none"> 8. Tiarra Carter 9. Caryn Forbes 10. Wellpath, LLC 	<ol style="list-style-type: none"> 7. Respondeat Superior (Wellpath) 8. Respondeat Superior (Wellpath) 9. Attorney's fees under O.C.G.A. § 13-6-11 (All defendants)
Smith v. Las Vegas Metropolitan Police Department et al., Case No. 23-cv-00092 (D. Nev.).	<ol style="list-style-type: none"> 1. Las Vegas Metropolitan Police Department 2. Wellpath, LLC 3. RN Rachel Clark 4. RN Tanja Wasielewski 5. RN Geneva Bessie 6. LCSW Sandra Celis 7. MA/LNA Meleka St. John 8. RN Stephanie Estala; 9. NP Hugh Andrew Rosset 10. NP Shelley Ameduri 11. PA Andrea Balogh 12. RN Aynur Kabota 13. Corrections Officer Vanessa Mitchell 14. Corrections Officer Don'te Mitchell 15. Corrections Officer Joshua Waldman 16. Does 1-30 	<ol style="list-style-type: none"> 1. Failure To Protect in Violation of the Fourteenth Amendment (42 U.S.C. § 1983) 2. Inadequate Medical and Mental Health Care in Violation of the Fourteenth Amendment (42 U.S.C. § 1983) 3. Deprivation of Familial Association in Violation of the Fourteenth Amendment (42 U.S.C. § 1983) 4. Municipal Liability—Failure to Train (42 U.S.C. § 1983) 5. Municipal Liability—Policy & Custom (42 U.S.C. § 1983) 6. Disability Discrimination in Violation of Title II of the Americans with Disabilities Act; Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. § 12131 et seq.; 29 U.S.C. § 794(A)) 7. Wrongful Death 8. Neglect of a Vulnerable Person 9. Negligent Infliction of Emotional Distress 10. Intentional Infliction of Emotional Distress
Vargas v. United States of America et al., Case No. 5:23-cv-00380 (C.D. Cal.).	<ol style="list-style-type: none"> 1. United States of America 2. GEO Group 3. Wellpath, LLC 	<ol style="list-style-type: none"> 1. Federal Tort Claims Act—Negligence (United States) 2. Federal Tort Claims Act—Negligent Infliction of Emotional Distress (United States) 3. Federal Tort Claims Act—Intentional Infliction of Emotional Distress (United States) 4. Federal Tort Claims Act—False Arrest/Imprisonment (United States) 5. Violation of Detention Standards (Wellpath and GEO) 6. Negligence (Wellpath and GEO) 7. Negligent Infliction of Emotional Distress (Wellpath and GEO) 8. Wrongful Death (All Defendants)

<p>Yang et al. v. County of Yuba et al., 2:23-cv-00066-TLN-JDP (E.D. Cal.).</p>	<ol style="list-style-type: none"> 1. County of Yuba 2. Sgt. Jeffrey T. Palmer 3. Correctional Officer Ismael Ramos 4. Wellpath, LLC 	<ol style="list-style-type: none"> 1. 42 U.S.C. § 1983 – Deliberate Indifference to Serious Medical Needs 2. 42 U.S.C. § 1983 – Deprivation of Familial Relation 3. 42 U.S.C. § 1983 – <i>Monell</i> Entity Liability 4. 42 U.S.C. § 1983 – Supervisory Liability 5. California Civil Code § 52.1 (b) – State Civil Rights Violations 6. Negligence
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