

CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT  
IN AND FOR HILLSBOROUGH COUNTY, FLORIDA  
CIVIL DIVISION

In re:

TOTAL SPINE CARE, LLC,

Assignor,

Case No. 2019-CA-002776

to

SONEET KAPILA,

Assignee.

**NOTICE OF FILING COMPLEX BUSINESS LITIGATION DIVISION ADDENDUM**

Assignee, Soneet Kapila of KapilaMukamal, by and through his undersigned attorneys,  
hereby gives notice of filing the attached Complex Litigation Division Addendum.

Dated: March 15, 2019

*/s/ Edward J. Peterson*

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## COMPLEX BUSINESS LITIGATION DIVISION ADDENDUM

### Party or Attorney Filing Action Must Place an "X" in One of the Boxes Below

The categories of cases set out below shall guide the parties and the Court in the designation of cases for the Complex Business Litigation Division ("CBLD").

#### AMOUNT IN CONTROVERSY GREATER THAN \$150,000.00

- Non-consumer UCC-related transactions;
- Purchases and sales of businesses or the assets of a business, including contract disputes, commercial landlord-tenant claims, and business torts;
- Non-consumer sale of goods or services by or to business enterprises;
- Non-consumer bank or brokerage accounts, including loan, deposit, cash management, and investment accounts;
- Purchase, sale, lease of commercial (real or personal) property or security interests therein;
- Commercial surety bonds;
- Franchisee / franchisor relationships and liabilities;
- Malpractice against professionals, except health care providers, in connection with rendering services relating to a business enterprise;
- Business torts, including unfair competition, breach of fiduciary duty, and tortious interference with contracts;
- Complex construction litigation, other than consumer home construction disputes, unless a court determines that the home construction dispute is business-related and complex; or
- Insurance coverage, bad faith litigation, and third party indemnity actions against insurers arising under policies issued to businesses, such as claims arising under a commercial general liability policy, commercial property policy, or title insurance policy, not including claims where the underlying dispute is a personal injury claim, unless a court determines that the personal injury insurance claim is business-related and complex.

#### ANY AMOUNT IN CONTROVERSY

- Internal affairs or governance, dissolution or liquidation rights, obligations between or among owners (shareholders, partners, members), or liability or indemnity of managers (officers, directors, managers, trustees, or members or partners functioning as managers) of corporations, partnerships, limited partnerships, limited liability companies or partnerships;
- Trade secrets and non-compete agreements;
- Intellectual property;
- Securities or state securities laws;
- Antitrust statutes;
- Shareholder derivative actions and related class actions; and
- Corporate trust affairs or director and officer liability.

**NOTE: A copy of the Civil Cover Sheet and this Addendum must be served with the Complaint for all Complex Business Litigation Division cases. See Administrative Order S-2008-105 for further Complex Business Litigation Division requirements.**