

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

In re:

Laser Spine Institute, LLC ¹	Case No. 2019-CA-2762
CLM Aviation, LLC	Case No. 2019-CA-2764
LSI HoldCo, LLC	Case No. 2019-CA-2765
LSI Management Company, LLC	Case No. 2019-CA-2766
Laser Spine Surgery Center of Arizona, LLC	Case No. 2019-CA-2767
Laser Spine Surgery Center of Cincinnati, LLC	Case No. 2019-CA-2768
Laser Spine Surgery Center of Cleveland, LLC	Case No. 2019-CA-2769
Laser Spine Surgical Center, LLC	Case No. 2019-CA-2770
Laser Spine Surgery Center of Pennsylvania, LLC	Case No. 2019-CA-2771
Laser Spine Surgery Center of St. Louis, LLC	Case No. 2019-CA-2772
Laser Spine Surgery Center of Warwick, LLC	Case No. 2019-CA-2773
Medical Care Management Services, LLC	Case No. 2019-CA-2774
Spine DME Solutions, LLC	Case No. 2019-CA-2775
Total Spine Care, LLC	Case No. 2019-CA-2776
Laser Spine Institute Consulting, LLC	Case No. 2019-CA-2777
Laser Spine Surgery Center of Oklahoma, LLC	Case No. 2019-CA-2780

Assignors,

Consolidated Case No.
2019-CA-2762

to

Soneet Kapila,

Division L

Assignee.

**ASSIGNEE'S RESPONSE TO
JONNA LEMIEUX'S MOTION FOR RELIEF FROM STAY**

Assignee, Soneet Kapila of KapilaMukamal, as assignee of Laser Spine Institute, LLC and the above-captioned affiliate assignors (“**Assignee**”), by and through his undersigned attorneys, files this response (the “**Response**”) to Claimant Jonna Lemieux’s Motion for Relief from Stay

¹ On April 8, 2019, the Court entered an order administratively consolidating this case with the assignment cases of the following entities: LSI Management Company, LLC; Laser Spine Institute Consulting, LLC; CLM Aviation, LLC; Medical Care Management Services, LLC; LSI HoldCo, LLC; Laser Spine Surgical Center, LLC; Laser Spine Surgery Center of Arizona, LLC; Laser Spine Surgery Center of Cincinnati, LLC; Laser Spine Surgery Center of St. Louis, LLC; Laser Spine Surgery Center of Pennsylvania, LLC; Laser Spine Surgery Center of Oklahoma, LLC; Laser Spine Surgery Center of Warwick, LLC; Laser Spine Surgery Center of Cleveland, LLC; Total Spine Care, LLC; and Spine DME Solutions, LLC.

(the “**Motion**”), and states:

Prior to the commencement of the assignment cases, Jonna Lemieux (the “**Claimant**”) filed a lawsuit seeking to recover damages based on allegations of medical malpractice, which was pending in Hillsborough County, Case No. 16-CA-4548 (the “**Lawsuit**”). The Motion seeks relief to continue prosecution of the Lawsuit “. . . to extent insurance proceeds are available to compensate the Claimant for her injuries.” Motion p. 2. The Assignee consents to the relief requested in the Motion provided that the Claimant is limited to recovering from available insurance and does not obtain any *in personam* relief against the assignment entities.

/s/ Scott A. Stichter

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Counsel for Assignee

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing *Assignee's Response to Jonna Lemieux's Motion for Relief from Stay* has been furnished on May 30, 2019 by the Court's electronic system to all parties receiving electronic service.

/s/ Scott A. Stichter

Scott Stichter