

SEP 28 2016

LARAYNE CLEEK, CLERK
BY: SANDRA FLUD

Michael J. Lampe #82199
Michael P. Smith #206927
Law Offices of Michael J. Lampe
108 West Center Avenue
Visalia, California 93291
Telephone (559) 738-5975
Facsimile (559) 738-5644

Attorneys for Plaintiffs

BRET D. HILLMAN

Assigned to Judicial Officer _____

For All Purposes

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF TULARE

THOMAS DRILLING, WILLIAM K.
POSTLEWAITE, JOHN E. BECK, NED
KEHRLI, EDWARD T. HENRY, D.V.M.,
XAVIER J. AVILA, DOUGLAS JACOBS, J.D.
McNEARNEY, JENNIFER BURCHAM, DAVID
PHELPS, and PATRICIA DRILLING PHELPS,

Plaintiffs,

vs.

SHERRIE BELL; PARMOD KUMAR, M.D.;
LINDA WILBOURN; RICHARD TORREZ;
LAURA GADKE; TULARE LOCAL HEALTH
CARE DISTRICT dba TULARE REGIONAL
MEDICAL CENTER, a public entity;
HEALTHCARE CONGLOMERATE
ASSOCIATES, LLC, a California limited liability
company; REBECCA ZULIM, M.D.; BENNY
BENZEEVI, M.D.; and Does 1 through 100,
inclusive,

Defendants.

Case No. 267051

VERIFIED COMPLAINT FOR
DECLARATORY AND INJUNCTIVE
RELIEF

Related Matters:

Kumar, et al. v. Betre, et. al.
Tulare County Superior Court Case
No. 265230

*Martin-Soares, et al. v. Tulare Local
Health Care District, et al.*
Tulare County Superior Court Case
No. 266902

CASE MANAGEMENT CONFERENCE

Hearing Date: January 18, 2017

Time: 8:30

Department: 7

Plaintiffs allege:

GENERAL ALLEGATIONS:

1. Plaintiff Thomas Drilling is a former Mayor of the City of Tulare.

VERIFIED COMPLAINT FOR DECLARATORY
AND INJUNCTIVE RELIEF

1 2. Plaintiff William K. Postlewaite is a former Superintendent of the Tulare City School
2 District.

3 3. Plaintiff John E. Beck is a former Superintendent of the Tulare City School District.

4 4. Plaintiff Ned Kehrli is a former Superintendent of the Tulare Joint Union High School
5 District.

6 5. Plaintiff Edward T. Henry is a Dr. of Veterinary Medicine.

7 6. Each plaintiff named in this action is a resident of the Tulare Local Health Care
8 District *dba* Tulare Regional Medical Center, and a taxpayer of the District.

9 7. Each plaintiff in this action is a "person" and a "member of the public" within the
10 meaning of the California Public Records Act, Government Code § 6250 *et seq.* (*the Public*
11 *Records Act*).

12 8. Defendant Tulare Local Health Care District *dba* Tulare Regional Medical Center
13 (*the District*) is, and at all times herein mentioned was, a "local agency" within the meaning of the
14 Public Records Act.

15 9. Defendant Sherrie Bell (*Bell*) is the President of the District and serves on the Board
16 of Directors of the District.

17 10. Defendant Parmod Kumar, M.D. (*Kumar*), is the Vice President of the District and
18 serves on the Board of Directors of the District.

19 11. Defendant Linda Wilbourn (*Wilbourn*) is the Secretary of the District and serves on
20 the Board of Directors of the District.

21 12. Defendant Richard Torrez (*Torrez*) is the Treasurer of the District and serves on the
22 Board of Directors of the District.

23 13. Defendant Laura Gadke (*Gadke*) serves on the Board of Directors of the District.

24 14. Defendant Healthcare Conglomerate Associates, LLC (*HCCA*), is a California limited
25 liability company that currently provides day-to-day administrative and management services for
26 the hospital and other facilities owned by the District. Under the terms of a Management Services
27 Agreement entered into between HCCA and the District dated May 29, 2014, HCCA is currently

1 being paid an amount exceeding \$250,000.00 per month (plus expenses) to provide these
2 administrative and management services.

3 15. Defendants Parmod Kumar (*Kumar*), Rebecca Zulim (*Zulim*), and Benny Benzeevi
4 (*Benzeevi*), are medical doctors affiliated with the District.

5 16. On information and belief plaintiffs allege that Benzeevi is a member of HCCA.

6 17. Plaintiffs do not know the true names and capacities of the defendants named
7 herein as Does 1 through 100, and therefore sue these defendants by such fictitious names.
8 Plaintiffs will amend this complaint to allege their true names and capacities when ascertained.
9 Plaintiffs are informed and believe and thereon allege that each of the fictitiously named
10 defendants are legally responsible in some manner for the occurrences herein alleged, and that
11 the violations alleged herein were proximately caused by such wrongful acts. At all times herein
12 mentioned, each of the defendants was the agent, employee, or partner of each of the remaining
13 defendants, and in doing the things alleged herein, was acting within the purpose, scope and
14 course of such relationship.

15 FIRST CAUSE OF ACTION

16 (Taxpayers' Action to Enjoin Illegal Expenditure or Waste of Public Funds
17 against Bell, Kumar, Wilbourn, Torrez, Gadke, the District, HCCA,
18 and Does 1 through 100)

19 18. Plaintiffs reallege and incorporate herein by reference each and every allegation
20 contained in paragraphs 1 through 17 of this complaint.

21 19. On May 4, 2016, Kumar, Zulim and Benzeevi commenced a *private civil action*
22 against Abraham Betre in the Tulare County Superior Court, case no. 265230 (*the Kumar lawsuit*),
23 entitled:

24 "*Parmod Kumar, M.D., Rebecca Zulim, M.D. and Benny Benzeevi, M.D., Plaintiffs,*
25 *v. Abraham Betre, D.O. and Does 1 through 10, inclusive.*"

26 A true and correct copy of the face page of the Kumar lawsuit is attached hereto as Exhibit
27 1.

1 20. The Kumar lawsuit contained causes of action alleging (1) invasion of privacy, (2)
2 intentional interference with prospective economic relations, (3) unfair business practices, and (4)
3 injunctive relief.

4 21. *The District was not a party to the Kumar lawsuit.*

5 22. The Kumar lawsuit sought to recover actual damages, punitive damages, restitution,
6 prejudgment interest, and injunctive relief *all for the benefit of Defendants Kumar, Zulim and*
7 *Benzeevi.*

8 23. Neither the District nor the taxpayers of the District had any financial stake in the
9 outcome of the Kumar lawsuit. Notwithstanding this fact, plaintiffs allege on information and belief
10 that in a closed session of the District's Board of Directors conducted on March 29, 2016, Bell,
11 Wilbourn, Torrez, and Gadke, acting on behalf of the District, authorized public funds to be used
12 to prosecute the Kumar lawsuit, and reported to the public the following information only:

13 "Richard Torrez made a motion to approve the initiation of a legal action. Linda
14 Wilbourn seconded the motion. Dr. Parmod Kumar abstained from voting. The
15 motion passed unanimously. Other particulars will be disclosed upon inquiry, unless
16 doing so will jeopardize TRMC's ability to complete service of process on one or
17 more unserved parties, or will jeopardize TRMC's ability to conclude existing
18 settlement negotiations to its advantage."

19 A true and correct copy of the District's March 29 Regular Meeting Minutes reflecting this
20 action is attached hereto as Exhibit 2 (agenda item VII, *Item B*).

21 24. Plaintiffs allege on information and belief that the March 29 closed session report
22 to the public failed to identify Kumar, Zulim and Benzeevi as plaintiffs in the "legal action"
23 authorized by the Board of Directors in an attempt to hide the misuse of public funds as described
24 herein.

25 25. Plaintiffs allege on information and belief that, contrary to the March 29 closed
26 session report to the public, there were no "existing settlement negotiations" regarding the facts
27 and circumstances in the Kumar lawsuit.
28

1 26. On or about August 11, 2016, the Hon. David Mathias granted a Special Motion to
2 Strike the Kumar lawsuit under California's anti-SLAPP statute (CCP §425.15), and ordered the
3 complaint filed by Kumar, Zulim and Benzeevi be dismissed.

4 27. On information and belief, plaintiffs allege that Attorney Bruce Greene of the Baker
5 Hostetler law firm currently represents both the District and HCCA in various capacities.

6 28. On September 16, 2016, a Public Records Act request was served upon Attorney
7 Bruce Greene, who at the time was the only person authorized to accept Public Records Act
8 requests on behalf of the District, requesting, *inter alia*, the following documents:

9 "All billing statements for legal services either charged to the District or paid by the
10 District, *directly or indirectly*, regarding Tulare County Superior Court Case no.
VCU265230, entitled *Parmod Kumar, et al. v. Abraham Betre, et al.*, properly
redacted, to reflect (at a minimum) the following information:

- 11 (a) Hours worked;
12 (b) The identity of the person performing the work; and
13 (c) The amount charged.

14 All checks, warrants, or wire transfer statements issued by the District to any
15 provider of legal services described herein for any of the legal work described
16 herein."

17 A true and correct copy of this Public Records Act request is attached hereto as Exhibit 3.

18 29. On September 26, 2016, the District responded with 43 pages of redacted billing
19 statements from the Baker Hostetler law firm, reflecting the following billings to the District directly
20 related to the Kumar lawsuit:

| | |
|---|--------------------|
| 21 Legal services through March 31, 2016: | \$16,618.50 |
| 22 Legal services through April 30, 2016: | 8,100.00 |
| 23 Legal services through May 31, 2016: | 2,212.50 |
| 24 Legal services through June 30, 2016: | 894.15 |
| 25 Legal services through July 31, 2016: | 43,812.19 |
| 26 Legal services through August 31, 2016: | 26,576.50 |
| 27 Total: | \$98,213.84 |

1 A true and correct copy of the District's response is attached hereto as Exhibit 4 (bate
2 stamped 9-16-2016 PRA 000001 through 9-16-2016 PRA 0000046.)

3 30. Plaintiffs allege that the use of public funds to prosecute a purely private action for
4 the benefit of Kumar, Zulim and Benzeevi is an illegal expenditure of public funds and constitutes
5 a gross violation of the public trust.

6 31. Plaintiffs further allege that the use of public funds to prosecute a purely private civil
7 action for the benefit of Kumar, Zulim and Benzeevi is waste of public funds in violation of the
8 provisions of Code of Civil Procedure §526a, and should be enjoined by this court.

9 32. Defendants have expended public funds or obligated the District to use public funds
10 for the prosecution of a private civil action of no benefit to the public, and solely for the benefit of
11 Kumar, Zulim and Benzeevi.

12 33. Plaintiffs seek a preliminary and permanent injunction, enjoining defendants, and
13 their agents, employees, and representatives from using public funds to pay any legal fees,
14 directly or indirectly, for the prosecution, participation in, or board discussion of Tulare County
15 Superior Court case no. 265230, entitled *Parmod Kumar, M.D., Rebecca Zulim, M.D. and Benny*
16 *Benzeevi, M.D., Plaintiffs, v. Abraham Betre, D.O. and Does 1 through 10, inclusive.*

17 34. Plaintiffs additionally seek to recover their attorney's fees in this action under the
18 provisions of Code of Civil Procedure §1021.5, and any other legal or equitable bases for recovery
19 of attorneys' fees in actions such as this.

20 SECOND CAUSE OF ACTION

21 (Taxpayers' Action for Declaratory Relief Against All Defendants

22 and Does 1 through 100)

23 35. Plaintiffs reallege and incorporate herein by reference each and every allegation
24 contained in paragraphs 1 through 34 of this complaint.

25 36. Defendants Bell, Wilbourn, Torrez, and Gadke, acting on behalf of the District, the
26 District, and its agent HCCA, all contend that it is a proper use of public funds to finance a private
27 civil action of no benefit to the public, and solely for the benefit of Kumar, Zulim and Benzeevi.

1 37. Kumar, Zulim and Benzeevi contend that it is a proper use of public funds to finance
2 a private civil action of no benefit to the public, and solely for their benefit.

3 38. Plaintiffs dispute the contentions of the defendants as set forth above, and desire
4 a judicial determination of their taxpayer and citizen rights to recover any public funds used to
5 finance the prosecution of the Kumar lawsuit.

6 THIRD CAUSE OF ACTION

7 (Declaratory Relief for Public Records Act Violation

8 Against the District, HCCA, and Does 1 through 100)

9 39. Plaintiffs reallege and incorporate herein by reference each and every allegation
10 contained in paragraphs 1 through 38 of this complaint.

11 40. The California Legislature has declared that access to information concerning the
12 conduct of the people's business is a "fundamental and necessary right" of every person in this
13 state. Govt. Code §6250.

14 41. In 2004, California voters overwhelmingly approved Proposition 59, also known as
15 The Sunshine Act, which amended the California Constitution to provide its citizens "the right of
16 access to information concerning the conduct of the people's business, and, therefore ... the
17 writings of public officials and agencies shall be open to public scrutiny." Cal. Const. Art. 1,
18 §3(b)(1).

19 42. A statute, such as the Public Records Act, "shall be broadly construed if it furthers
20 the people's right of access, and narrowly construed if it limits the right of access." Cal. Const.
21 Art. 1, §3(b)(2).

22 43. A public record is broadly defined as "any writing containing information relating to
23 the conduct of the public's business prepared, owned, used, or retained by any state or local
24 agency." Govt. Code §6252(e).

25 44. Unless otherwise provided by law, public records are open to inspection at all times
26 during the office hours of the District. Govt. Code §6253(a).

1 45. Under the Public Records Act, the District must respond in no more than ten
2 calendar days to a request for copies of public records with notification whether the records will
3 be disclosed. Govt. Code §6253(c). In "unusual circumstances," the District may extend the ten
4 day response period for up to 14 additional days. Govt. Code §6253(c).

5 46. In addition to requiring notice of whether the requested records will be disclosed
6 within ten days of its receipt of a Public Records Act request, the Public Records Act further
7 requires that copies of the requested records be made "promptly available" to the person
8 requesting them. Govt. Code, §6253(b).

9 47. The Public Records Act specifically provides that, "Nothing in this chapter shall be
10 construed to permit an agency to delay or obstruct the inspection or copying of public records."
11 Govt. Code, §6253(d).

12 48. On September 16, 2016, a written Public Records Act request was directed to the
13 District (Exhibit 3 hereto).

14 49. The District responded to this Public Records Act request on September 26, 2016
15 (Exhibit 4 hereto).

16 50. The District's response is not in compliance with the Public Record Act.

17 51. Plaintiffs desire a judicial determination of their rights as interested citizens, and
18 defendants' duties as a public agency and the managing agent of the District, under the Public
19 Records Act.

20 52. Plaintiffs additionally seeks to recover their attorney's fees in this action under the
21 provisions of Government Code 6259(d) and Code of Civil Procedure section 1021.5.

22 WHEREFORE, plaintiffs pray judgment as follows:

23 ON THE FIRST CAUSE OF ACTION:

24 1. For a preliminary and permanent injunction, enjoining defendants, and their agents,
25 employees, and representatives from using public funds to pay any legal fees, directly or
26 indirectly, for the prosecution, participation in, or board discussion of Tulare County Superior Court
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1 case no. 265230, entitled *Parmod Kumar, M.D., Rebecca Zulim, M.D. and Benny Benzeevi, M.D.,*
2 *Plaintiffs, v. Abraham Betre, D.O. and Does 1 through 10, inclusive.*

3 ON THE SECOND CAUSE OF ACTION:

4 1. For a judicial declaration that any public funds used to finance the prosecution of
5 the Kumar lawsuit be returned to the District.

6 ON THE THIRD CAUSE OF ACTION:

7 1. For a declaration that the District has not complied with the September 16, 2016,
8 Public Records Act request, Exhibit 3 hereto, and that the requested documents be made
9 available for inspection and copying forthwith.

10 ON ALL CAUSES OF ACTION:

11 1. That plaintiffs be awarded reasonable attorneys' fees in this action under the
12 provisions of Government Code §6259(d), Code of Civil Procedure §1021.5, and any other legal
13 or equitable bases for recovery of attorneys' fees in actions such as this;

14 2. That plaintiffs be awarded their costs of suit incurred herein; and

15 3. That plaintiffs be awarded such other relief as this court may consider proper.

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19 Date: September 27, 2016


LAW OFFICES OF MICHAEL J. LAMPE,
Attorneys for Plaintiffs
By: Michael J. Lampe

1 VERIFICATION

2 I, Thomas Drilling, have read the foregoing VERIFIED COMPLAINT FOR DECLARATORY
3 AND INJUNCTIVE RELIEF, and know the contents thereof. The matters contained therein are
4 true of my own knowledge, except as to those matters which are alleged on information and belief,
5 or relate to the individual capacity of a single plaintiff, and as to those matters I believe them to
6 be true.

7 I declare under penalty of perjury under the laws of the State of the California that the
8 foregoing is true and correct.

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12 Dated: September 27, 2016


THOMAS DRILLING

1 VERIFICATION

2 I, William K. Postlewaite, have read the foregoing VERIFIED COMPLAINT FOR
3 DECLARATORY AND INJUNCTIVE RELIEF, and know the contents thereof. The matters
4 contained therein are true of my own knowledge, except as to those matters which are alleged
5 on information and belief, or relate to the individual capacity of a single plaintiff, and as to those
6 matters I believe them to be true.

7 I declare under penalty of perjury under the laws of the State of the California that the
8 foregoing is true and correct.

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12 Dated: September 28, 2016

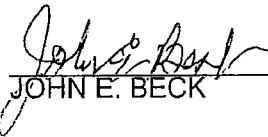

13 WILLIAM K. POSTLEWAITE
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1 VERIFICATION

2 I, John E. Beck, have read the foregoing VERIFIED COMPLAINT FOR DECLARATORY
3 AND INJUNCTIVE RELIEF, and know the contents thereof. The matters contained therein are
4 true of my own knowledge, except as to those matters which are alleged on information and belief,
5 or relate to the individual capacity of a single plaintiff, and as to those matters I believe them to
6 be true.

7 I declare under penalty of perjury under the laws of the State of the California that the
8 foregoing is true and correct.

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12 Dated: September 28, 2016

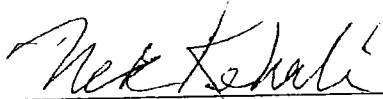

JOHN E. BECK

VERIFICATION

I, Ned Kehrli, have read the foregoing VERIFIED COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF, and know the contents thereof. The matters contained therein are true of my own knowledge, except as to those matters which are alleged on information and belief, or relate to the individual capacity of a single plaintiff, and as to those matters I believe them to be true.

I declare under penalty of perjury under the laws of the State of the California that the foregoing is true and correct.

Dated: September 28, 2016

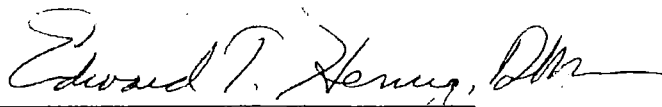

NED KEHRLI

1 VERIFICATION

2 I, Edward T. Henry, D.M.V., have read the foregoing VERIFIED COMPLAINT FOR
3 DECLARATORY AND INJUNCTIVE RELIEF, and know the contents thereof. The matters
4 contained therein are true of my own knowledge, except as to those matters which are alleged
5 on information and belief, or relate to the individual capacity of a single plaintiff, and as to those
6 matters I believe them to be true.

7 I declare under penalty of perjury under the laws of the State of the California that the
8 foregoing is true and correct.

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12 Dated: September 28, 2016

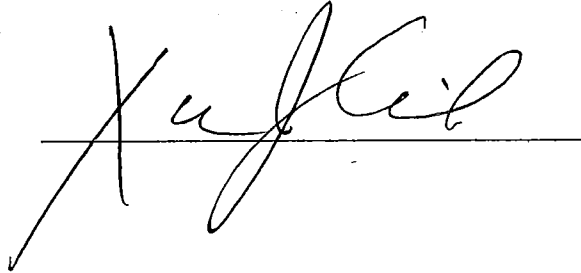

EDWARD T. HENRY, D.V.M.

VERIFICATION

I, Xavier J Avila, have read the foregoing VERIFIED COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF, and know the contents thereof. The matters contained therein are true of my own knowledge, except as to those matters which are alleged on information and belief, or relate to the individual capacity of a single plaintiff, and as to those matters I believe them to be true.

I declare under penalty of perjury under the laws of the State of the California that the foregoing is true and correct.

Dated: September 27, 2016

A handwritten signature in black ink, appearing to read "Xavier J. Avila", is written over a horizontal line. The signature is stylized with a large "X" and a long, sweeping underline.

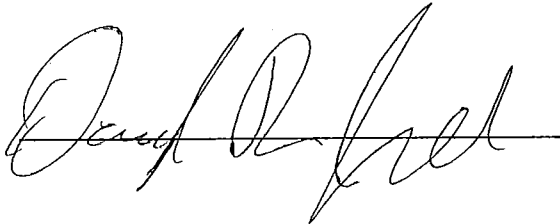
1 VERIFICATION

2 I, Douglas Jacobs, have read the foregoing VERIFIED COMPLAINT FOR
3 DECLARATORY AND INJUNCTIVE RELIEF, and know the contents thereof. The matters
4 contained therein are true of my own knowledge, except as to those matters which are alleged
5 on information and belief, or relate to the individual capacity of a single plaintiff, and as to those
6 matters I believe them to be true.

7 I declare under penalty of perjury under the laws of the State of the California that the
8 foregoing is true and correct.

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12 Dated: September 27, 2016

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A handwritten signature in black ink, appearing to read "Douglas Jacobs", is written over a horizontal line. The signature is cursive and stylized.

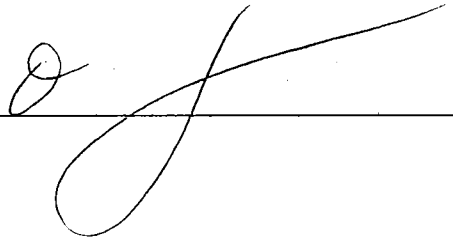
1 VERIFICATION

2 I, J. D. McNEARNEY, have read the foregoing VERIFIED COMPLAINT FOR
3 DECLARATORY AND INJUNCTIVE RELIEF, and know the contents thereof. The matters
4 contained therein are true of my own knowledge, except as to those matters which are alleged
5 on information and belief, or relate to the individual capacity of a single plaintiff, and as to those
6 matters I believe them to be true.

7 I declare under penalty of perjury under the laws of the State of the California that the
8 foregoing is true and correct.

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12 Dated: September 27, 2016

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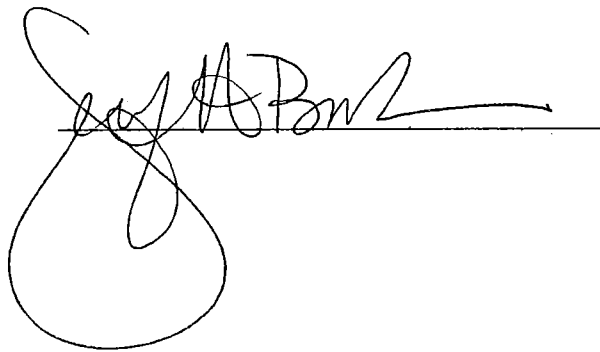
1 VERIFICATION

2 I, Jennifer Burcham, have read the foregoing VERIFIED COMPLAINT FOR
3 DECLARATORY AND INJUNCTIVE RELIEF, and know the contents thereof. The matters
4 contained therein are true of my own knowledge, except as to those matters which are alleged
5 on information and belief, or relate to the individual capacity of a single plaintiff, and as to those
6 matters I believe them to be true.

7 I declare under penalty of perjury under the laws of the State of the California that the
8 foregoing is true and correct.

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12 Dated: September 27, 2016

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A handwritten signature, likely of Jennifer Burcham, is written over a horizontal line. The signature is stylized and cursive, with a large loop at the bottom. The line extends to the right of the signature.

VERIFICATION

I, David Phelps, have read the foregoing VERIFIED COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF, and know the contents thereof. The matters contained therein are true of my own knowledge, except as to those matters which are alleged on information and belief, or relate to the individual capacity of a single plaintiff, and as to those matters I believe them to be true.

I declare under penalty of perjury under the laws of the State of the California that the foregoing is true and correct.

Dated: September 27, 2016

David Phelps

VERIFICATION

I, PATRICIA DRILLING PHELPS have read the foregoing VERIFIED COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF, and know the contents thereof. The matters contained therein are true of my own knowledge, except as to those matters which are alleged on information and belief, or relate to the individual capacity of a single plaintiff, and as to those matters I believe them to be true.

I declare under penalty of perjury under the laws of the State of the California that the foregoing is true and correct.

Dated: September 27, 2016

Patricia Drilling Phelps

1 Robert A. Levinson, Esq. [SBN 82300]
David Krol, Esq. [SBN 213740]
2 **LEVINSON ARSHONSKY & KURTZ, LLP**
15303 Ventura Blvd., Suite 1650
3 Sherman Oaks, CA 91403
Telephone: (818) 382-3434
4 Facsimile: (818) 382-3433
E-Mail: rlevinson@laklawyers.com
5 dkrol@laklawyers.com

6 Attorneys for Plaintiffs
PARMOD KUMAR, M.D. and
7 REBECCA ZULIM, M.D.

8 ****IN ASSOCIATION WITH****

9 Robert C. Welsh, Esq. [SBN 130782]
Blythe Golay, Esq. [SBN 285389]
10 **BAKER & HOSTETLER LLP**
11601 Wilshire Blvd., Suite 1400
11 Los Angeles, CA 90025-0509
Telephone: (310) 442-8852
12 Facsimile: (310) 820-8859

13 Attorneys for Plaintiff
BENNY BENZEEVI, M.D.

14
15 SUPERIOR COURT OF THE STATE OF CALIFORNIA
16 COUNTY OF TULARE

17
18 PARMOD KUMAR, M.D., REBECCA
ZULIM, M.D. and BENNY BENZEEVI, M.D.,

19 Plaintiffs,

20 v.

21 ABRAHAM BETRE, D.O. and DOES 1
through 10, inclusive,

22 Defendants.
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FILED
TULARE COUNTY SUPERIOR COURT
VISALIA DIVISION

MAY 04 2016

LARAYNE CLEEK, CLERK

BY: *[Signature]*

CASE MANAGEMENT CONFERENCE

Hearing Date: 9-13-16
Time: 8:30 am
Department: 7

BRET D. HILLMAN

Assigned to Judicial Officer _____

For All Purposes

265230

Case No.:

UNLIMITED JURISDICTION

COMPLAINT FOR:

1. INVASION OF PRIVACY –
INTRUSION INTO PRIVATE
AFFAIRS
2. INVASION OF PRIVACY – PUBLIC
DISCLOSURE OF PRIVATE FACTS
3. INTENTIONAL INTERFERENCE
WITH PROSPECTIVE ECONOMIC
RELATIONS
4. UNFAIR BUSINESS PRACTICES
(Bus. & Prof. Code, § 17200, et seq.)
5. INJUNCTIVE RELIEF





HCCA
Tulare Regional Medical Center

**Tulare Local Health Care District
Board of Directors
Regular Meeting Minutes**

**Tuesday, March 29, 2016
Board Convenes at 4:00 p.m.**

**Allied Services Building
Conference Room No. 2
869 N. Cherry Street – Tulare, CA 93274**

PRESENT

Sherrie Bell, Chair
Parmod Kumar, MD, Vice Chair
Richard Torrez, Treasurer
Linda Wilbourn, Secretary
Laura Gadke, Board Member

OTHERS PRESENT

Benny Benzeevi, M.D., Chair HCCA
Evelyn Vallarta, District Operations Manager
Community Members
Legal Counsel (Baker & Hostetler LLP)

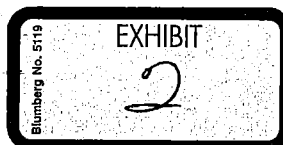
I. CALL TO ORDER

Chair Sherrie Bell called the meeting to order at approximately 4:01 p.m.

II. CITIZEN REQUESTS/PUBLIC COMMENTS

The following individuals provided public comments:

- Samantha Phillips-Bland
- Michael Coons
- Kimberley Hughes
- Alma Knudson
- Diane Martin-Soares
- Edward Henry
- Delbert Bryant
- David Ibarra
- Stephen Harrell
- Alberto Aguilar
- Teresa Berberia
- Sharon Fong
- Michelle Moore



Board of Directors:
Sherrie Bell
Chairman and President

Parmod Kumar, MD
Vice Chairman

Richard Torrez
Treasurer

Linda Wilbourn
Board Member

Laura Gadke
Board Member

III. APPROVAL OF MINUTES

- Special Board Meeting Minutes of March 7, 2016, Regular Board Meeting Minutes of February 24, 2016 and Amended Special Board Meeting Minutes of February 15, 2016.

Action: Dr. Parmod Kumar made a motion to approve the minutes for the March 7, 2016 Special Board Meeting, the February 24, 2016 Regular Board Meeting and the Amended minutes for the February 15, 2016 Special Board Meeting. Linda Wilbourn seconded the motion. The motion passed unanimously.

IV. OPEN SESSION AGENDA

A. Consent Agenda

1. Request to approve the following Tulare Local Health Care District (TLHCD) Medical Executive Committee Policies:

1-0003 Focused Professional Practice Evaluation (FPPE) Policy for Newly Privileged Practitioners

2. Request to approve the following Tulare Local Health Care District (TLHCD) Hospital Policies:

10-1132 Notifying Medicare Beneficiaries of Their Discharge Appeal Rights
10-1136 Discharge Planning
10-1137 Patient Complaint and Grievance Process
10-1140 Notifying Medicare Beneficiaries of Hospital Issued Notice of Non-Coverage
11-2013 Maternity Cash Discount Policy
12-3042 Surgery Department Anesthesia Services
12-3043 Anesthesia Service Case Scheduling
12-3106 Hospital Provided Scrubs in the Operating Room
12-3107 Discharge of Patient from OR to the Post Anesthesia Recovery Unit (PACU)
15-2068 Competency Assessment for Clinical Staff
ISO 9001 4.2.3 Document Control Policy

3. Request to approve the following Tulare Local Health Care District (TLHCD) Physician Orders:

None

4. Request to approve the following Physician/Other Agreements:

- a. **Rutherford Co. Change Orders #0016 through #0020**
- b. **Emergency Room On-Call Agreement (Nephrology)**
TRMC and Ajay K. Rachakonda, M.D.
- c. **Business Associate Agreement**
TRMC and Ajay K. Rachakonda, M.D.
- d. **Emergency Room On-Call Agreement (Nephrology)**
TRMC and Tariq Javed, M.D.
- e. **Business Associate Agreement**
TRMC and Tariq Javed, M.D.

- f. **Squire Patton Boggs**
Engagement Letter
- g. **Appointment of Tulare Home Care Services Administrator**
Angie Graziano, R.N.

Action: Dr. Parmod Kumar made the motion to approve the Consent Agenda Items. Richard Torrez seconded the motion. The motion passed unanimously.

B. Report by Administration - HCCA Management

1. Finance

- a. Monthly Financial Update – February 2016

Action: Linda Wilbourn made the motion to approve the Financial Statements of January 2016. Laura Gadke seconded the motion. The motion passed unanimously.

2. Compliance and Quality

Alan Germany presented the financial summary highlighting the results for the month of February. He also provided an overview of the volume trends of the various operating components within the healthcare district. He noted that the District's operating margin continues to be solidly positive and volume trends. The cash balance at the end of February was \$13.9 million and Days Cash on Hand at 71. He compared this to prior year at 10.9 million and Days Cash on Hand at 57. He also noted that the cash position is strong and continues to significantly improve.

3. Other

Dr. Benzeevi reviewed the hospital's dramatic turnaround over the past two years now having completed 24 consecutive months of positive net margins. While other hospitals are closing or laying off people, Tulare has managed to become profitable, hire more people, and provide pay raises. Dr. Benzeevi stressed that this is all possible because of the hundreds of hard working women and men that toil daily to make the hospital what it is. He also stressed that the hospital is a community asset and will take the whole community working together to ensure its sustainability and growth into the future.

C. Board of Director Update/Action Items - Board Chair

- 1. **Board Member Reports**
- 2. **Capital Expenditure Reimbursements – Board Chair**

Action: Linda Wilbourn made the motion to accept and adopt Resolution 847. Richard Torrez seconded the motion. The motion passed unanimously.

D. Medical Staff Report – Ronald Ostrom, D.O., Chief of Medical Staff (or MEC representative)

- 1. **MEC Recommendations to the Board and Report of Actions**

Action: Laura Gadke made a motion to approve the MEC Recommendations as presented to the Board. Richard Torrez seconded the motion. The motion passed unanimously.

V. SUSPEND OPEN SESSION - ADJOURN TO CLOSED SESSION

Board of Directors:
Sherrie Bell
Chairman and President

Parmod Kumar, MD
Vice Chairman

Richard Torrez
Treasurer

Linda Wilbourn
Board Member

Laura Gadke
Board Member

Chair Sherrie Bell adjourned to Closed Session at approximately 5:25 p.m.

VI. CLOSED SESSION

VII. ADJOURN CLOSED SESSION/RECONVENE OPEN SESSION

Chair Sherrie Bell adjourned Closed Session and reconvened to Open Session at approximately 6:45 p.m. Pursuant to Government Code section 54957.1, the following reportable actions were taken by the Board in Closed Session:

Item A – The Board took action to accept the closed session MEC Reports relating to Peer Review, Credentialing and Quality Assurance, as presented by Dr. Macaluso. The motion was made by Laura Gadke to accept the Reports as presented. Linda Wilbourn seconded the motion. Dr. Parmod Kumar abstained from voting. The motion passed unanimously.

Item B – Richard Torrez made a motion to approve the initiation of a legal action. Linda Wilbourn seconded the motion. Dr. Parmod Kumar abstained from voting. The motion passed unanimously. Other particulars will be disclosed upon inquiry, unless doing so will jeopardize TRMC's ability to complete service of process on one or more unserved parties, or will jeopardize TRMC's ability to conclude existing settlement negotiations to its advantage.

VIII. ADJOURNMENT

There being no further business, Chair Sherrie Bell adjourned the meeting at approximately 7 p.m.

Respectfully submitted,

Linda Wilbourn, Secretary

Board of Directors:

Sherrie Bell
Chairman and President

Parmod Kumar, MD
Vice Chairman

Richard Torrez
Treasurer

Linda Wilbourn
Board Member

Laura Gadke
Board Member

LAW OFFICES OF MICHAEL J. LAMPE

108 West Center Avenue
Visalia, California 93291
Telephone 559.738.5975
Facsimile 559.738.5644

Michael J. Lampe
Michael P. Smith
Matthew D. Owdom

VIA EMAIL

September 16, 2016

Bruce Greene
Baker Hostetler
11601 Wilshire Blvd.
Suite 1400
Los Angeles, California 90025-0509
email: bgreene@bakerlaw.com

Re: Tulare Regional Medical Center
Public Records Act request

Dear Mr. Greene:

Please consider this correspondence as a request under the California Public Records Act (Government Code section 6250 *et seq.*).

In making this request, please note that whenever I use the term "writing" or "writings," I am incorporating the definition of the term contained in section 6252(g) of the California Government Code, as well as section 250 of the California Evidence Code, which sections read as follows:

"Writing" means handwriting, typewriting, printing, photostating, photographing, photocopying, transmitting by electronic mail or facsimile, and every other means of recording upon any tangible thing any form of communication or representation, including letters, words, pictures, sounds, or symbols, or combinations thereof, and any record thereby created, regardless of the manner in which the record has been stored."



Copies of the following documents are hereby requested:

1. All contracts, retainer agreements, or similar documents (*the legal services contracts*) entered into between Tulare Local Healthcare District dba Tulare Regional Medical Center (*the District*), and any lawyer or law firm, relating to the furnishing of legal services for the District between January 1, 2015, and the date of the District's response to this request.
2. All modifications or extensions of the legal services contracts.
3. All billing statements for legal services rendered pursuant to the legal services contracts, properly redacted, to reflect (at a minimum) the following information:
 - (a) Hours worked;
 - (b) The identity of the person performing the work; and
 - (c) The amount charged.
4. All billing statements for legal services either charged to the District or paid by the District, *directly or indirectly*, regarding Tulare County Superior Court Case no. VCU265230, entitled *Parmod Kumar, et al. v. Abraham Betre, et al.*, properly redacted, to reflect (at a minimum) the following information:
 - (a) Hours worked;
 - (b) The identity of the person performing the work; and
 - (c) The amount charged.
5. All checks, warrants, or wire transfer statements issued by the District to any provider of legal services described herein for any of the legal work described herein.

To expedite the District's compliance with this request, we will accept electronic copies of the requested documents. If the District prefers to provide paper copies, my office will pay any reasonable charges.

September 16, 2016
Bruce Greene
Baker Hostetler
Page 2

If you have questions concerning the contents of this correspondence, please do not hesitate to contact my office.

Yours very truly,

MICHAEL J. LAMPE
MJL/ml
cc: client

BakerHostetler

Baker&Hostetler LLP

11601 Wilshire Boulevard
Suite 1400
Los Angeles, CA 90025-0509
T 310.820.8800
F 310.820.8869
www.bakerlaw.com

Bruce R. Greene
bgreene@bakerlaw.com

September 26, 2016

VIA E-MAIL (mjl@lampe-law.com)

Michael J. Lampe, Esq.
Law Offices of Michael J. Lampe
108 West Center Avenue
Visalia, California 93291

Re: Response to Records Request pursuant to California Public Records Act

Dear Mr. Lampe:

This firm is legal counsel for Tulare Local Health Care District dba Tulare Regional Medical Center ("TRMC"). This letter acknowledges your request for records from TRMC pursuant to the provisions of the California Public Records Act, as set forth in a letter dated September 16, 2016 (the "Request"). Please be advised that nothing in this response is intended to be nor shall it be construed to be a waiver of the right of TRMC to assert any and all claims of exemptions or privileges to the inspection of all or any part of the records you have requested. Specifically, you have requested the following:

1. All contracts, retainer agreements, or similar documents (*the legal service contracts*) entered into between Tulare Local Healthcare District dba Tulare Regional Medical Center (*the District*), and any lawyer or law firm, relating to the furnishing of legal services for the District between January 1, 2015, and the date of the District's response to this request.
2. All modifications or extensions of the legal service contracts.
3. All billing statements for legal services rendered pursuant to the legal services contracts, properly redacted, to reflect (at a minimum) the following information:
 - (a) Hours worked;
 - (b) The identity of the person performing the work; and
 - (c) The amount charged.
4. All billing statements for legal services either charged to the District or paid by the District, *directly or indirectly*, regarding Tulare County Superior Court Case no.

Atlanta Chicago Cincinnati Cleveland Columbus Costa Mesa Denver
Houston Los Angeles New York Orlando Philadelphia Seattle Washington, DC

093734.000003 609686271.1



9-16-2016 PRA 000001

VCU265230, entitled *Parmod Kumar, et al. v. Abraham Betre, et al.*, properly redacted, to reflect (at a minimum) the following information:

- (a) Hours worked;
- (b) The identity of the person performing the work; and
- (c) The amount charged.

5. All checks, warrants or wire transfer statements issued by the District to any provider of legal services described herein for any of the legal work described herein.

Response to Request No. 1: Engagement letters (and similar documents in the nature of legal service contracts) are privileged and need not be produced under the California Public Records Act. See Government Code Section 6254(k). Retainer agreements between local agencies and their attorneys constitute confidential communications within the scope of the attorney-client privilege. Ref: Bus & Prof Code 6068, 6149; Evidence Code 952, 954.

Response to Request No. 2: See response to Request No. 1 above.

Response to Request No. 3: We advise you that the number of records potentially responsive to this Request is voluminous in that there were many law firms engaged by TRMC during the time period in question, and all of such records will need to be identified (they are not maintained in electronic format) and sent to the different attorneys for redaction. We anticipate that it will take 90-120 days to comply with the request as written. If you desire to narrow the scope of this Request, the estimated time to respond will be shorter. Upon receipt of a revised request, we will advise you of the expected time that it will take to comply with the revised request. In any event, after the records have been located, we will advise you of the expected cost of reproduction.

Response to Request No. 4: Copies of records (redacted as you indicated) are attached.

Response to Request No. 5: See response to Request No. 3 above.

Please be advised that due to the unexpectedly large volume of Public Records Act requests which TRMC has been receiving recently, and due to the limited resources available to TRMC to respond to these requests (especially requests which seek voluminous amounts of records), the time

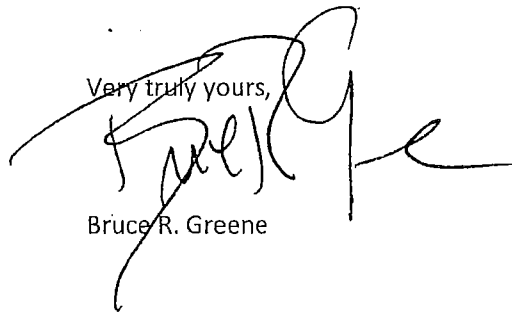
Michael J. Lampe, Esq.
September 26, 2016
Page 3

required to identify and reproduce records is likely to be substantially longer than it may have been in the past.

To the extent the requested records exist, TRMC will produce the requested records except to the extent that records that are exempt from disclosure: (i) as preliminary drafts, notes, etc. pursuant to Government Code §6254(a); (ii) as personnel, medical or similar files the disclosure of which would constitute an unwarranted invasion of personal privacy pursuant to §6254(c); (iii) as protected by the attorney client privilege and the attorney work product doctrine pursuant to §6254(k); (iv) as records of the organized committees of the TRMC Medical Staff, an independent self-governing entity, whose committees' records are exempt from disclosure by California Evidence Code §1157 pursuant to §6254(k); (v) as confidential trade secret information pursuant to §6254(k); and or (vi) where the public interest served by not disclosing the records clearly outweighs the public interest served by disclosure of the records (e.g., Performance Improvement records, individual evaluations of members of the Medical Staff).

If you have any further questions, please do not hesitate to contact me either by email at bgreene@bakerlaw.com or by phone at (310) 442-8834.

Very truly yours,

A handwritten signature in black ink, appearing to read 'B. R. Greene', written over the typed name.

Bruce R. Greene

BakerHostetler

Tulare Local Healthcare District
869 North Cherry St
Tulare, CA 93274-3462

Invoice Date: 04/28/16
Invoice Number: 50236648
B&H File Number: 07110/093734/000015
Taxpayer ID Number: 34-0082025
Page 1

Regarding: Potential Action Against [REDACTED] Betre

For professional services rendered through March 31, 2016.

BALANCE FOR THIS INVOICE DUE BY 05/28/16 \$ 16,618.50

Remittance Copy

Please include this page with payment

Invoice No: 50236648

Firm Contact Information

Brian Gross
(310) 979-8470
bgross@bakerlaw.com

Please Remit To:
Baker & Hostetler LLP
P.O. Box 70189
Cleveland, OH 44190-0189

FOR WIRE REMITTANCES:
Baker & Hostetler LLP
KeyBank, N.A., Cleveland, OH
Account No: 1001516552 / ABA 041001039
SWIFT Code: KEYBUS33

Reference Invoice No: 50236648

Email the "Remittance Copy" to bakerlockbox@bakerlaw.com
9-16-2016 PRA 000004

Baker Hostetler

Tulare Local Healthcare District
869 North Cherry St
Tulare, CA 93274-3462

Invoice Date: 04/28/16
Invoice Number: 50236648
B&H File Number: 07110/093734/000015
Taxpayer ID Number: 34-0082025
Page 2

Regarding: Potential Action Against [REDACTED] Betre

For professional services rendered through March 31, 2016

Fees

\$ 16,618.50

\$ 16,618.50

BALANCE FOR THIS INVOICE DUE BY 05/28/16

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New York

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Orlando

Columbus
Philadelphia

Costa Mesa
Seattle

9-16-2016 PRA 000005
Denver
Washington, DC

Tulare Local Healthcare District

Invoice Date:
Invoice Number:
Matter Number:

04/28/16
50236648
093734 000015
Page 3

Regarding: Potential Action Against [REDACTED] Betre

REDACTED

Matter Number: 093734 000015

| Name | Hours | Rate | Amount |
|-------------------|-------|-----------|--------------|
| Greene Bruce R | 1.00 | \$ 730.00 | \$ 730.00 |
| Golay, Blythe | 20.40 | 350.00 | 7,140.00 |
| Welsh Robert C | 12.30 | 675.00 | 8,302.50 |
| Maliniak, Abbie P | 0.60 | 600.00 | 360.00 |
| MacDonald, Hugh A | 0.40 | 215.00 | 86.00 |
| Total | 34.70 | | \$ 16,618.50 |

| Date | Name | Description | Hours | Amount |
|----------|----------------|-------------|-------|----------|
| 03/21/16 | Golay, Blythe | [REDACTED] | 0.40 | 140.00 |
| 03/21/16 | Golay, Blythe | [REDACTED] | 1.30 | 455.00 |
| 03/21/16 | Greene Bruce R | [REDACTED] | 1.00 | 730.00 |
| 03/21/16 | Welsh Robert C | [REDACTED] | 3.10 | 2,092.50 |

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9-16-2016 PRA 000006

Tulare Local Healthcare District

REDACTED

Invoice Date:
Invoice Number:
Matter Number:04/28/16
50236648
093734 000015
Page 4

| Date | Name | Description | Hours | Amount |
|----------|--------------------|-------------|-------|----------|
| 03/22/16 | Golay, Blythe | [REDACTED] | 0.20 | 70.00 |
| 03/23/16 | Golay, Blythe | [REDACTED] | 0.20 | 70.00 |
| 03/23/16 | Golay, Blythe | [REDACTED] | 1.90 | 665.00 |
| 03/23/16 | MacDonald, Hugh A. | [REDACTED] | 0.10 | 21.50 |
| 03/23/16 | Welsh Robert C | [REDACTED] | 1.10 | 742.50 |
| 03/24/16 | Golay, Blythe | [REDACTED] | 0.30 | 105.00 |
| 03/24/16 | Golay, Blythe | [REDACTED] | 3.40 | 1,190.00 |
| 03/24/16 | Golay, Blythe | [REDACTED] | 0.60 | 210.00 |
| 03/25/16 | Golay, Blythe | [REDACTED] | 0.30 | 105.00 |
| 03/25/16 | Golay, Blythe | [REDACTED] | 4.20 | 1,470.00 |

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Atlanta
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SeattleDenver
Washington, DC

9-16-2016 PRA 000007

Tulare Local Healthcare District

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Invoice Date:
Invoice Number:
Matter Number:04/28/16
50236648
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Page 5

| Date | Name | Description | Hours | Amount |
|----------|--------------------|-------------|-------|----------|
| 03/28/16 | Golay, Blythe | [REDACTED] | 2.10 | 735.00 |
| 03/28/16 | Golay, Blythe | [REDACTED] | 0.20 | 70.00 |
| 03/28/16 | Golay, Blythe | [REDACTED] | 0.40 | 140.00 |
| 03/28/16 | Maliniak, Abbie P. | [REDACTED] | 0.60 | 360.00 |
| 03/28/16 | Welsh, Robert C. | [REDACTED] | 2.80 | 1,890.00 |
| 03/29/16 | Golay, Blythe | [REDACTED] | 2.30 | 805.00 |
| 03/29/16 | Golay, Blythe | [REDACTED] | 0.50 | 175.00 |
| 03/29/16 | Golay, Blythe | [REDACTED] | 1.60 | 560.00 |
| 03/29/16 | Golay, Blythe | [REDACTED] | 0.50 | 175.00 |

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Atlanta
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Los AngelesCincinnati
New YorkCleveland
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Washington, DC

9-16-2016 PRA 000008

Tulare Local Healthcare District

REDACTED

Invoice Date:
Invoice Number:
Matter Number:

04/28/16
50236648
093734 000015
Page 6

| Date | Name | Description | Hours | Amount |
|----------|-------------------|-------------|-------|-----------|
| 03/29/16 | MacDonald, Hugh A | [REDACTED] | 0.30 | 64.50 |
| 03/29/16 | Welsh Robert C | [REDACTED] | 4.20 | 2,835.00 |
| 03/30/16 | Welsh Robert C | [REDACTED] | 1.10 | 742.50 |
| Total | | | 34.70 | 16,618.50 |

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Tulare Local Healthcare District
869 North Cherry St
Tulare, CA 93274-3462

Invoice Date: 05/09/16
Invoice Number: 50239542
B&H File Number: 07110/093734/000015
Taxpayer ID Number: 34-0082025
Page 1

Regarding: Potential Action Against [REDACTED] Betre

For professional services rendered through April 30, 2016

BALANCE FOR THIS INVOICE DUE BY 06/08/16 \$ 8,100.00

Remittance Copy

Please include this page with payment

Invoice No: 50239542

Firm Contact Information

Brian Gross
(310) 979-8470
bgross@bakerlaw.com

Please Remit To:
Baker & Hostetler LLP
P.O. Box 70189
Cleveland, OH 44190-0189

Reference Invoice No: 50239542

FOR WIRE REMITTANCES:
Baker & Hostetler LLP
KeyBank, N.A., Cleveland, OH
Account No: 1001516552 / ABA 041001039
SWIFT Code: KEYBUS33

Email the "Remittance Copy" to bakerlockbox@bakerlaw.com

9-16-2016 PRA 000010

BakerHostetler

Tulare Local Healthcare District
869 North Cherry St
Tulare, CA 93274-3462

Invoice Date: 05/09/16
Invoice Number: 50239542
B&H File Number: 07110/093734/000015
Taxpayer ID Number: 34-0082025
Page 2

Regarding: Potential Action Against [REDACTED] Betre

For professional services rendered through April 30, 2016

| | | |
|--|-------------|-------------|
| Fees | \$ 8,100.00 | |
| | | \$ 8,100.00 |
| BALANCE FOR THIS INVOICE DUE BY 06/08/16 | | |
| PREVIOUS BALANCE | 16,618.50 | |
| TOTAL BALANCE DUE | 24,718.50 | |

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Philadelphia

Costa Mesa
Seattle

9-16-2016 PRA 000011
Denver
Washington, DC

Tulare Local Healthcare District

Invoice Date:
Invoice Number:
Matter Number:

05/09/16
50239542
093734.000015
Page 3

Regarding: Potential Action Against [REDACTED] Batre

Matter Number: 093734.000015

REDACTED

| Name | Hours | Rate | Amount |
|--------------------|-------|-----------|-------------|
| Greene Bruce R | 1.00 | \$ 730.00 | \$ 730.00 |
| Wolin Robert M | 1.70 | 690.00 | 1,173.00 |
| Golay, Blythe | 0.40 | 350.00 | 140.00 |
| Welsh Robert C | 8.40 | 675.00 | 5,670.00 |
| MacDonald, Hugh A. | 1.80 | 215.00 | 387.00 |
| Total | 13.30 | | \$ 8,100.00 |

| Date | Name | Description | Hours | Amount |
|----------|--------------------|-------------|-------|--------|
| 04/01/16 | Welsh Robert C | [REDACTED] | 0.60 | 405.00 |
| 04/04/16 | MacDonald, Hugh A. | [REDACTED] | 1.30 | 279.50 |
| 04/05/16 | Greene Bruce R | [REDACTED] | 1.00 | 730.00 |
| 04/05/16 | MacDonald, Hugh A. | [REDACTED] | 0.20 | 43.00 |
| 04/06/16 | Welsh Robert C | [REDACTED] | 0.40 | 270.00 |

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Atlanta
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Cincinnati
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Orlando

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9-16-2016 PRA 000012

Tulare Local Healthcare District

REDACTED

Invoice Date
Invoice Number
Matter Number05/09/16
50239542
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Page 4

| Date | Name | Description | Hours | Amount |
|----------|--------------------|-------------|-------|--------|
| 04/08/16 | Welsh Robert C | [REDACTED] | 0.30 | 202.50 |
| 04/08/16 | Wolin Robert M | [REDACTED] | 0.60 | 414.00 |
| 04/11/16 | MacDonald, Hugh A. | [REDACTED] | 0.10 | 21.50 |
| 04/11/16 | Welsh Robert C | [REDACTED] | 1.00 | 675.00 |
| 04/11/16 | Wolin Robert M | [REDACTED] | 1.10 | 759.00 |
| 04/12/16 | MacDonald, Hugh A. | [REDACTED] | 0.10 | 21.50 |
| 04/14/16 | MacDonald, Hugh A. | [REDACTED] | 0.10 | 21.50 |
| 04/14/16 | Welsh Robert C | [REDACTED] | 0.40 | 270.00 |
| 04/18/16 | Welsh Robert C | [REDACTED] | 0.30 | 202.50 |

Baker & Hostetler LLP

9-16-2016 PRA 000013

Atlanta
HoustonChicago
Los AngelesCincinnati
New YorkCleveland
OrlandoColumbus
PhiladelphiaCosta Mesa
SeattleDenver
Washington, DC

Tulare Local Healthcare District

REDACTED

Invoice Date:
Invoice Number:
Matter Number:

05/09/16
50239542
098734.000015
Page 5

| Date | Name | Description | Hours | Amount |
|----------|----------------|-------------|-------|----------|
| 04/19/16 | Welsh Robert C | [REDACTED] | 1.10 | 742.50 |
| 04/20/16 | Golay, Blythe | [REDACTED] | 0.10 | 35.00 |
| 04/20/16 | Golay, Blythe | [REDACTED] | 0.10 | 35.00 |
| 04/20/16 | Welsh Robert C | [REDACTED] | 1.80 | 1,215.00 |
| 04/21/16 | Welsh Robert C | [REDACTED] | 1.60 | 1,080.00 |
| 04/22/16 | Welsh Robert C | [REDACTED] | 0.30 | 202.50 |
| 04/27/16 | Golay, Blythe | [REDACTED] | 0.20 | 70.00 |

Baker & Hostetler LLP

9-16-2016 PRA 000014

Atlanta
Houston

Chicago
Los Angeles

Cincinnati
New York

Cleveland
Orlando

Columbus
Philadelphia

Costa Mesa
Seattle

Denver
Washington, DC

Tulare Local Healthcare District

REDACTED

Invoice Date: 05/09/16
 Invoice Number: 50239542
 Matter Number: 093734.000015
 Page 6

| Date | Name | Description | Hours | Amount |
|----------|----------------|-------------|-------|----------|
| 04/27/16 | Welsh Robert C | [REDACTED] | 0.60 | 405.00 |
| Total | | | 13.30 | 8,100.00 |

ACCOUNT SUMMARY

| Invoice Date | Invoice Number | Original Amount | Last Payment Date | Total Payments Applied | Last Adjustment Date | Total Adjustment Applied | A/R Balance |
|-------------------------------------|----------------|-----------------|-------------------|------------------------|----------------------|--------------------------|--------------|
| 04/28/16 | 50236648 | \$ 16,618.50 | | \$ 0.00 | | \$ | \$ 16,618.50 |
| Total | | \$ 16,618.50 | | \$ 0.00 | | \$ | \$ 16,618.50 |
| Account Receivable Balance | | | | | | | \$ 16,618.50 |
| This Invoice | | | | | | | \$ 8,100.00 |
| Total Due including current invoice | | | | | | | \$ 24,718.50 |

Baker & Hostetler LLP

9-16-2016 PRA 000015

Atlanta Chicago Cincinnati Cleveland Columbus Costa Mesa Denver
 Houston Los Angeles New York Orlando Philadelphia Seattle Washington, DC

BakerHostetler

Tulare Local Healthcare District
869 North Cherry St
Tulare, CA 93274-3462

Invoice Date: 06/14/16
Invoice Number: 50253384
B&H File Number: 07110/093734/000015
Taxpayer ID Number: 34-0082025
Page 1

Regarding: Action Against Betre

For professional services rendered through May 31, 2016

BALANCE FOR THIS INVOICE DUE BY 07/14/16 \$ 2,212.50

Remittance Copy

Please include this page with payment

Invoice No: 50253384

Firm Contact Information

Brian Gross
(310) 979-8470
bgross@bakerlaw.com

Please Remit To:
Baker & Hostetler LLP
P.O. Box 70189
Cleveland, OH 44190-0189

FOR WIRE REMITTANCES:
Baker & Hostetler LLP
KeyBank, N.A., Cleveland, OH
Account No: 1001516552 / ABA 041001039
SWIFT Code: KEYBUS33

Reference Invoice No: 50253384

Email the "Remittance Copy" to bakerlockbox@bakerlaw.com

9-16-2016 PRA 000016

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Tulare Local Healthcare District
869 North Cherry St
Tulare, CA 93274-3462

Invoice Date: 06/14/16
Invoice Number: 50253384
B&H File Number: 07110/093734/000015
Taxpayer ID Number: 34-0082025
Page 2

Regarding: Action Against Betre

For professional services rendered through May 31, 2016

| | | |
|--|------------------|-------------|
| Fees | \$ 2,212.50 | |
| BALANCE FOR THIS INVOICE DUE BY 07/14/16 | | \$ 2,212.50 |
| PREVIOUS BALANCE | <u>24,718.50</u> | |
| TOTAL BALANCE DUE | <u>26,931.00</u> | |

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Tulare Local Healthcare District

REDACTED

Invoice Date:
Invoice Number:
Matter Number:

06/14/16
50253384
093734.000015
Page 3

Regarding: Action Against Betre

Matter Number: 093734.000015

| Name | Hours | Rate | Amount |
|--------------------|-------|-----------|-------------|
| Welsh Robert C | 2.80 | \$ 675.00 | \$ 1,890.00 |
| MacDonald, Hugh A. | 1.50 | 215.00 | 322.50 |
| Total | 4.30 | | \$ 2,212.50 |

| Date | Name | Description | Hours | Amount |
|----------|--------------------|-------------|-------|--------|
| 05/02/16 | Welsh Robert C | [REDACTED] | 0.80 | 540.00 |
| 05/05/16 | MacDonald, Hugh A. | [REDACTED] | 0.10 | 21.50 |
| 05/05/16 | Welsh Robert C | [REDACTED] | 0.60 | 405.00 |
| 05/12/16 | MacDonald, Hugh A. | [REDACTED] | 0.60 | 129.00 |
| 05/12/16 | Welsh Robert C | [REDACTED] | 0.40 | 270.00 |
| 05/13/16 | Welsh Robert C | [REDACTED] | 0.80 | 540.00 |

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Tulare Local Healthcare District

REDACTED

Invoice Date:
 Invoice Number:
 Matter Number:

06/14/16
 50253384
 093734.000015
 Page 4

| Date | Name | Description | Hours | Amount |
|----------|--------------------|-------------|-------|----------|
| 05/25/16 | MacDonald, Hugh A. | [REDACTED] | 0.80 | 172.00 |
| 05/26/16 | Welsh Robert C | [REDACTED] | 0.20 | 135.00 |
| Total | | | 4.30 | 2,212.50 |

ACCOUNT SUMMARY

| Invoice Date | Invoice Number | Original Amount | Last Payment Date | Total Payments Applied | Last Adjustment Date | Total Adjustment Applied | A/R Balance |
|--------------|----------------|-----------------|-------------------|------------------------|----------------------|--------------------------|-------------|
| 04/28/16 | 50236648 | \$ 16,618.50 | | \$ 0.00 | | \$ | 16,618.50 |
| 05/09/16 | 50239542 | 8,100.00 | | 0.00 | | | 8,100.00 |
| Total | | \$ 24,718.50 | | \$ 0.00 | | \$ | 24,718.50 |

| | |
|-------------------------------------|--------------|
| Account Receivable Balance | \$ 24,718.50 |
| This Invoice | \$ 2,212.50 |
| Total Due including current invoice | \$ 26,931.00 |

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Tulare Local Healthcare District
869 North Cherry St.
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Tulare, CA 93274-3462

Invoice Date: 07/13/16
Invoice Number: 50264274
B&H File Number: 07110/093734/000015
Taxpayer ID Number: 34-0082025
Page 1

Regarding: Action Against Betre

For professional services rendered through June 30, 2016

BALANCE FOR THIS INVOICE DUE BY 08/12/16 \$ 894.15

Remittance Copy

Please include this page with payment

Invoice No: 50264274

Firm Contact Information

Brian Gross
(310) 979-8470
bgross@bakerlaw.com

| | |
|--|---|
| Please Remit To: Baker & Hostetler LLP P.O. Box 70189 Cleveland, OH 44190-0189 | FOR WIRE REMITTANCES: Baker & Hostetler LLP KeyBank, N.A., Cleveland, OH Account No: 1001516552 / ABA 041001039 SWIFT Code: KEYBUS33 |
| Reference Invoice No: 50264274 | Email the "Remittance Copy" to bakerlockbox@bakerlaw.com 9-16-2016 PRA 000020 |

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Tulare Local Healthcare District
869 North Cherry St
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Invoice Date: 07/13/16
Invoice Number: 50264274
B&H File Number: 07110/093734/000015
Taxpayer ID Number: 34-0082025
Page 2

Regarding: Action Against Betre

For professional services rendered through June 30, 2016

| | |
|----------|------------------|
| Fees | \$ 583.00 |
| Expenses | <u>\$ 311.15</u> |

BALANCE FOR THIS INVOICE DUE BY 08/12/16 \$ 894.15

PREVIOUS BALANCE 26,931.00

TOTAL BALANCE DUE 27,825.15

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9-16-2016 PRA 000021

Tulare Local Healthcare District

REDACTED

Invoice Date:
Invoice Number:
Matter Number:

07/13/16
50264274
093734.000015
Page 3

Regarding: Action Against Betre

Matter Number: 093734.000015

| Name | Hours | Rate | Amount |
|--------------------|-------|-----------|-----------|
| Welsh Robert C | 0.80 | \$ 675.00 | \$ 540.00 |
| MacDonald, Hugh A. | 0.20 | 215.00 | 43.00 |
| Total | 1.00 | | \$ 583.00 |

| Date | Name | Description | Hours | Amount |
|----------|--------------------|-------------|-------|--------|
| 06/03/16 | Welsh Robert C | [REDACTED] | 0.20 | 135.00 |
| 06/08/16 | Welsh Robert C | [REDACTED] | 0.20 | 135.00 |
| 06/10/16 | Welsh Robert C | [REDACTED] | 0.30 | 202.50 |
| 06/23/16 | MacDonald, Hugh A. | [REDACTED] | 0.20 | 43.00 |
| 06/24/16 | Welsh Robert C | [REDACTED] | 0.10 | 67.50 |
| | Total | | 1.00 | 583.00 |

Expenses and Other Charges

| | | |
|----------|------------|--------|
| 05/31/16 | [REDACTED] | 15.00 |
| 05/31/16 | [REDACTED] | 196.20 |

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Fulare Local Healthcare District

REDACTED

Invoice Date
Invoice Number
Matter Number

07/13/16
50264274
093734 000016
Page 4

05/31/16 [REDACTED] 99.95
[REDACTED] 311.15
Total \$ 311.15

ACCOUNT SUMMARY

| Invoice Date | Invoice Number | Original Amount | Last Payment Date | Total Payments Applied | Last Adjustment Date | Total Adjustment Applied | A/R Balance |
|--------------|----------------|-----------------|-------------------|------------------------|----------------------|--------------------------|--------------|
| 04/28/16 | 50236648 | \$ 16,618.50 | | \$ 0.00 | | \$ | 16,618.50 |
| 05/09/16 | 50239542 | 8,100.00 | | 0.00 | | | 8,100.00 |
| 06/14/16 | 50253384 | 2,212.50 | | 0.00 | | | 2,212.50 |
| Total | | \$ 26,931.00 | | \$ 0.00 | | \$ | \$ 26,931.00 |

Account Receivable Balance

This Invoice

Total Due including current invoice

\$ 26,931.00
\$ 894.15
\$ 27,825.15

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Tulare Local Healthcare District
869 North Cherry St
Tulare, CA 93274-3462

Invoice Date: 08/18/16
Invoice Number: 50278646
B&H File Number: 07110/093734/000015
Taxpayer ID Number: 34-0082025
Page 1

Regarding: Action Against Betre

For professional services rendered through July 31, 2016

BALANCE FOR THIS INVOICE DUE BY 09/17/16 \$ 43,812.19

Remittance Copy

Please include this page with payment

Invoice No: 50278646

Firm Contact Information

Bonita Paul
(310) 979-8477
Bpaul@bakerlaw.com

Please Remit To:
Baker & Hostetler LLP
P.O. Box 70189
Cleveland, OH 44190-0189

FOR WIRE REMITTANCES:
Baker & Hostetler LLP
KeyBank, N.A., Cleveland, OH
Account No: 1001516552 / ABA 041001039
SWIFT Code: KEYBUS33

Reference Invoice No: 50278646

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Tulare Local Healthcare District
869 North Cherry St
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Invoice Date: 08/18/16
Invoice Number: 50278646
B&H File Number: 07110/093734/000015
Taxpayer ID Number: 34-0082025
Page 2

Regarding: Action Against Betre

For professional services rendered through July 31, 2016

Fees \$ 42,190.50

Expenses \$ 1,621.69

BALANCE FOR THIS INVOICE DUE BY 09/17/16 \$ 43,812.19

PREVIOUS BALANCE 27,825.15

TOTAL BALANCE DUE 71,637.34

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Tulare Local Healthcare District

REDACTED

Invoice Date: 08/18/16
Invoice Number: 50278646
Matter Number: 093734.000015
Page 3

Regarding: Action Against Betre

Matter Number: 093734.000015

| Name | Hours | Rate | Amount |
|--------------------|-------|-----------|--------------|
| Greene Bruce R | 1.70 | \$ 730.00 | \$ 1,241.00 |
| Kochsiek, Blythe | 55.10 | 350.00 | 19,285.00 |
| Welsh Robert C | 27.70 | 675.00 | 18,697.50 |
| MacDonald, Hugh A. | 13.80 | 215.00 | 2,967.00 |
| Total | 98.30 | | \$ 42,190.50 |

| Date | Name | Description | Hours | Amount |
|----------|--------------------|-------------|-------|----------|
| 07/05/16 | Welsh Robert C | [REDACTED] | 0.20 | 135.00 |
| 07/07/16 | Welsh Robert C | [REDACTED] | 0.20 | 135.00 |
| 07/08/16 | Kochsiek, Blythe | [REDACTED] | 0.80 | 280.00 |
| 07/08/16 | Kochsiek, Blythe | [REDACTED] | 3.50 | 1,225.00 |
| 07/08/16 | Kochsiek, Blythe | [REDACTED] | 1.90 | 665.00 |
| 07/08/16 | Kochsiek, Blythe | [REDACTED] | 0.90 | 315.00 |
| 07/08/16 | MacDonald, Hugh A. | [REDACTED] | 0.30 | 64.50 |
| 07/08/16 | MacDonald, Hugh A. | [REDACTED] | 1.10 | 236.50 |

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Tulare Local Healthcare District

REDACTED

Invoice Date:
Invoice Number:
Matter Number:

08/18/16
50278646
093734.000015
Page 4

| Date | Name | Description | Hours | Amount |
|----------|------------------|-------------|-------|----------|
| 07/08/16 | Welsh Robert C | [REDACTED] | 1.90 | 1,282.50 |
| 07/13/16 | Kochsiek, Blythe | [REDACTED] | 0.40 | 140.00 |
| 07/13/16 | Kochsiek, Blythe | [REDACTED] | 3.80 | 1,330.00 |
| 07/13/16 | Welsh Robert C | [REDACTED] | 0.40 | 270.00 |
| 07/14/16 | Kochsiek, Blythe | [REDACTED] | 0.60 | 210.00 |
| 07/14/16 | Welsh Robert C | [REDACTED] | 0.90 | 607.50 |
| 07/15/16 | Welsh Robert C | [REDACTED] | 0.30 | 202.50 |
| 07/18/16 | Greene Bruce R | [REDACTED] | 1.00 | 730.00 |

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Tulare Local Healthcare District

REDACTED

Invoice Date:
Invoice Number:
Matter Number:

08/18/16
50278646
093734.000015
Page 5

| Date | Name | Description | Hours | Amount |
|----------|--------------------|-------------|-------|----------|
| 07/18/16 | Kochsiek, Blythe | [REDACTED] | 0.30 | 105.00 |
| 07/18/16 | Kochsiek, Blythe | [REDACTED] | 0.50 | 175.00 |
| 07/18/16 | MacDonald, Hugh A. | [REDACTED] | 0.20 | 43.00 |
| 07/18/16 | MacDonald, Hugh A. | [REDACTED] | 0.80 | 172.00 |
| 07/18/16 | MacDonald, Hugh A. | [REDACTED] | 0.30 | 64.50 |
| 07/19/16 | Greene Bruce R | [REDACTED] | 0.70 | 511.00 |
| 07/19/16 | Kochsiek, Blythe | [REDACTED] | 3.20 | 1,120.00 |
| 07/19/16 | Kochsiek, Blythe | [REDACTED] | 0.40 | 140.00 |
| 07/19/16 | Kochsiek, Blythe | [REDACTED] | 0.20 | 70.00 |
| 07/19/16 | Welsh Robert C | [REDACTED] | 2.80 | 1,890.00 |

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Invoice Date:
Invoice Number:
Matter Number:

08/18/16
50278646
093734.000015
Page 6

| Date | Name | Description | Hours | Amount |
|----------|------------------|-------------|-------|----------|
| 07/20/16 | Kochsiek, Blythe | [REDACTED] | 4.30 | 1,505.00 |
| 07/20/16 | Kochsiek, Blythe | [REDACTED] | 0.30 | 105.00 |
| 07/20/16 | Kochsiek, Blythe | [REDACTED] | 3.90 | 1,365.00 |
| 07/20/16 | Kochsiek, Blythe | [REDACTED] | 0.30 | 105.00 |
| 07/20/16 | Welsh Robert C | [REDACTED] | 2.30 | 1,552.50 |
| 07/21/16 | Kochsiek, Blythe | [REDACTED] | 0.40 | 140.00 |
| 07/21/16 | Kochsiek, Blythe | [REDACTED] | 3.20 | 1,120.00 |
| 07/21/16 | Kochsiek, Blythe | [REDACTED] | 1.30 | 455.00 |

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Tulare Local Healthcare District

REDACTED

Invoice Date:
Invoice Number:
Matter Number:

08/18/16
50278646
093734.000015
Page 7

| Date | Name | Description | Hours | Amount |
|----------|------------------|-------------|-------|----------|
| | | [REDACTED] | | |
| 07/21/16 | Welsh Robert C | [REDACTED] | 0.80 | 540.00 |
| | | [REDACTED] | | |
| 07/22/16 | Kochsiek, Blythe | [REDACTED] | 0.30 | 105.00 |
| 07/22/16 | Kochsiek, Blythe | [REDACTED] | 0.20 | 70.00 |
| 07/22/16 | Kochsiek, Blythe | [REDACTED] | 0.70 | 245.00 |
| 07/22/16 | Kochsiek, Blythe | [REDACTED] | 0.40 | 140.00 |
| 07/22/16 | Kochsiek, Blythe | [REDACTED] | 2.10 | 735.00 |
| 07/22/16 | Welsh Robert C | [REDACTED] | 4.30 | 2,902.50 |
| 07/25/16 | Kochsiek, Blythe | [REDACTED] | 1.90 | 665.00 |

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Tulare Local Healthcare District

REDACTED

Invoice Date:
Invoice Number:
Matter Number:

08/18/16
50278646
093734.000015
Page 8

| Date | Name | Description | Hours | Amount |
|----------|--------------------|-------------|-------|----------|
| 07/25/16 | Kochsiek, Blythe | [REDACTED] | 2.90 | 1,015.00 |
| 07/25/16 | Kochsiek, Blythe | [REDACTED] | 4.80 | 1,680.00 |
| 07/25/16 | Kochsiek, Blythe | [REDACTED] | 0.20 | 70.00 |
| 07/25/16 | MacDonald, Hugh A. | [REDACTED] | 0.20 | 43.00 |
| 07/25/16 | MacDonald, Hugh A. | [REDACTED] | 0.60 | 129.00 |
| 07/25/16 | Welsh Robert C | [REDACTED] | 2.80 | 1,890.00 |
| 07/26/16 | Kochsiek, Blythe | [REDACTED] | 1.30 | 455.00 |
| 07/26/16 | Kochsiek, Blythe | [REDACTED] | 0.40 | 140.00 |
| 07/26/16 | Welsh Robert C | [REDACTED] | 4.30 | 2,902.50 |

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Tulare Local Healthcare District

REDACTED

Invoice Date:
Invoice Number:
Matter Number:

08/18/16
50278646
093734.000015
Page 9

| Date | Name | Description | Hours | Amount |
|----------|--------------------|-------------|-------|----------|
| 07/27/16 | Kochsiek, Blythe | [REDACTED] | 0.20 | 70.00 |
| 07/27/16 | Kochsiek, Blythe | [REDACTED] | 0.20 | 70.00 |
| 07/27/16 | Kochsiek, Blythe | [REDACTED] | 4.20 | 1,470.00 |
| 07/27/16 | Kochsiek, Blythe | [REDACTED] | 0.50 | 175.00 |
| 07/27/16 | MacDonald, Hugh A. | [REDACTED] | 1.10 | 236.50 |
| 07/27/16 | MacDonald, Hugh A. | [REDACTED] | 0.10 | 21.50 |
| 07/27/16 | MacDonald, Hugh A. | [REDACTED] | 1.30 | 279.50 |
| 07/27/16 | Welsh Robert C | [REDACTED] | 3.90 | 2,632.50 |

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Invoice Date:
Invoice Number:
Matter Number:

08/18/16
50278646
093734.000015
Page 10

| Date | Name | Description | Hours | Amount |
|----------|--------------------|-------------|-------|--------|
| | | [REDACTED] | | |
| 07/28/16 | Kochsiek, Blythe | [REDACTED] | 1.80 | 630.00 |
| | | [REDACTED] | | |
| 07/28/16 | Kochsiek, Blythe | [REDACTED] | 0.20 | 70.00 |
| | | [REDACTED] | | |
| 07/28/16 | Kochsiek, Blythe | [REDACTED] | 0.20 | 70.00 |
| | | [REDACTED] | | |
| 07/28/16 | Kochsiek, Blythe | [REDACTED] | 1.10 | 385.00 |
| | | [REDACTED] | | |
| | | [REDACTED] | | |
| 07/28/16 | MacDonald, Hugh A. | [REDACTED] | 0.70 | 150.50 |
| | | [REDACTED] | | |
| | | [REDACTED] | | |
| 07/28/16 | MacDonald, Hugh A. | [REDACTED] | 0.20 | 43.00 |
| | | [REDACTED] | | |
| | | [REDACTED] | | |
| 07/28/16 | MacDonald, Hugh A. | [REDACTED] | 0.20 | 43.00 |
| | | [REDACTED] | | |
| | | [REDACTED] | | |
| 07/28/16 | MacDonald, Hugh A. | [REDACTED] | 0.10 | 21.50 |
| | | [REDACTED] | | |
| | | [REDACTED] | | |
| 07/28/16 | MacDonald, Hugh A. | [REDACTED] | 0.70 | 150.50 |
| | | [REDACTED] | | |

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Tulare Local Healthcare District

REDACTED

Invoice Date:
Invoice Number:
Matter Number:

08/18/16
50278646
093734.000015
Page 11

| Date | Name | Description | Hours | Amount |
|----------|--------------------|-------------|-------|-----------|
| 07/28/16 | Welsh Robert C | [REDACTED] | 1.70 | 1,147.50 |
| 07/29/16 | Kochsiek, Blythe | [REDACTED] | 0.80 | 280.00 |
| 07/29/16 | Kochsiek, Blythe | [REDACTED] | 0.50 | 175.00 |
| 07/29/16 | MacDonald, Hugh A. | [REDACTED] | 1.20 | 258.00 |
| 07/29/16 | MacDonald, Hugh A. | [REDACTED] | 1.10 | 236.50 |
| 07/29/16 | MacDonald, Hugh A. | [REDACTED] | 3.60 | 774.00 |
| 07/29/16 | Welsh Robert C | [REDACTED] | 0.90 | 607.50 |
| Total | | | 98.30 | 42,190.50 |

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9-16-2016 PRA 000034

REDACTED

Expenses and Other Charges

| | | |
|----------|------------|----------|
| 07/08/16 | [REDACTED] | 328.24 |
| 07/11/16 | [REDACTED] | 4.72 |
| 07/13/16 | [REDACTED] | 287.76 |
| 07/19/16 | [REDACTED] | 34.80 |
| 07/20/16 | [REDACTED] | 74.48 |
| 07/21/16 | [REDACTED] | 235.20 |
| 07/22/16 | [REDACTED] | 60.24 |
| 07/25/16 | [REDACTED] | 425.20 |
| 07/26/16 | [REDACTED] | 7.92 |
| 07/27/16 | [REDACTED] | 12.64 |
| 07/28/16 | [REDACTED] | 15.84 |
| 07/29/16 | [REDACTED] | 79.12 |
| | [REDACTED] | 1,566.16 |

| | | |
|----------|------------|------|
| 07/27/16 | [REDACTED] | 1.00 |
| 07/27/16 | [REDACTED] | 3.00 |
| 07/27/16 | [REDACTED] | 1.00 |
| 07/28/16 | [REDACTED] | 0.60 |
| 07/28/16 | [REDACTED] | 0.20 |
| 07/29/16 | [REDACTED] | 0.80 |
| | [REDACTED] | 6.60 |

| | | |
|----------|------------|--------|
| 07/22/16 | [REDACTED] | 164.00 |
|----------|------------|--------|

164.00

05/18/16

(116.00)

(116.00)

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9-16-2016 PRA 000035

Tulare Local Healthcare District

REDACTED

Invoice Date: 08/18/16
 Invoice Number: 50278646
 Matter Number: 093734.000015
 Page 13

07/22/16

0.93

0.93

Total \$ 1,621.69

ACCOUNT SUMMARY

| Invoice Date | Invoice Number | Original Amount | Last Payment Date | Total Payments Applied | Last Adjustment Date | Total Adjustment Applied | A/R Balance |
|--------------|----------------|-----------------|-------------------|------------------------|----------------------|--------------------------|--------------|
| 04/28/16 | 50236648 | \$ 16,618.50 | | \$ 0.00 | | \$ | \$ 16,618.50 |
| 05/09/16 | 50239542 | 8,100.00 | | 0.00 | | | 8,100.00 |
| 06/14/16 | 50253384 | 2,212.50 | | 0.00 | | | 2,212.50 |
| 07/13/16 | 50264274 | 894.15 | | 0.00 | | | 894.15 |
| Total | | \$ 27,825.15 | | \$ 0.00 | | \$ | \$ 27,825.15 |

Account Receivable Balance

\$ 27,825.15

This Invoice

\$ 43,812.19

Total Due including current invoice

\$ 71,637.34

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9-16-2016 PRA 000036

BakerHostetler

Tulare Local Healthcare District
869 North Cherry St
Tulare, CA 93274-3462

Invoice Date: 09/13/16
Invoice Number: 50286847
B&H File Number: 07110/093734/000015
Taxpayer ID Number: 34-0082025
Page 1

Regarding: Action Against Betre

For professional services rendered through August 31, 2016

BALANCE FOR THIS INVOICE DUE BY 10/13/16 \$ 26,576.50

Remittance Copy

Please include this page with payment

Invoice No: 50286847

Firm Contact Information

Bonita Paul
(310) 979-8477
Bpaul@bakerlaw.com

Please Remit To:
Baker & Hostetler LLP
P.O. Box 70189
Cleveland, OH 44190-0189

Reference Invoice No:
50286847

FOR WIRE REMITTANCES:
Baker & Hostetler LLP
KeyBank, N.A., Cleveland, OH
Account No: 1001516552 / ABA 041001039
SWIFT Code: KEYBUS33

Email the "Remittance Copy" to
bakerlockbox@bakerlaw.com

9-16-2016 PRA 000037

BakerHostetler

Tulare Local Healthcare District
869 North Cherry St
Tulare, CA 93274-3462

Invoice Date: 09/13/16
Invoice Number: 50286847
B&H File Number: 07110/093734/000015
Taxpayer ID Number: 34-0082025
Page 2

Regarding: Action Against Betre

For professional services rendered through August 31, 2016

Fees \$ 24,480.00

Expenses \$ 2,096.50

BALANCE FOR THIS INVOICE DUE BY 10/13/16 \$ 26,576.50

PREVIOUS BALANCE 71,637.34

TOTAL BALANCE DUE 98,213.84

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9-16-2016 PRA 000038

Tulare Local Healthcare District

REDACTED

Invoice Date: 09/13/16
Invoice Number: 50286847
Matter Number: 093734.000015
Page 3

Regarding: Action Against Betre

Matter Number: 093734.000015

| Name | Hours | Rate | Amount |
|--------------------|-------|-----------|--------------|
| Kochsiek, Blythe | 21.00 | \$ 350.00 | \$ 7,350.00 |
| Welsh Robert C | 20.60 | 675.00 | 13,905.00 |
| MacDonald, Hugh A. | 15.00 | 215.00 | 3,225.00 |
| Total | 56.60 | | \$ 24,480.00 |

| Date | Name | Description | Hours | Amount |
|----------|--------------------|-------------|-------|--------|
| 08/01/16 | MacDonald, Hugh A. | [REDACTED] | 2.10 | 451.50 |
| 08/01/16 | Welsh Robert C | [REDACTED] | 1.00 | 675.00 |
| 08/03/16 | Kochsiek, Blythe | [REDACTED] | 1.40 | 490.00 |
| 08/03/16 | MacDonald, Hugh A. | [REDACTED] | 1.60 | 344.00 |
| 08/05/16 | Kochsiek, Blythe | [REDACTED] | 0.80 | 280.00 |
| 08/05/16 | Kochsiek, Blythe | [REDACTED] | 1.30 | 455.00 |
| 08/05/16 | Welsh Robert C | [REDACTED] | 0.90 | 607.50 |

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9-16-2016 PRA 000039

Tulare Local Healthcare District

REDACTED

Invoice Date:
Invoice Number:
Matter Number:

09/13/16
50286847
093734.000015
Page 4

| Date | Name | Description | Hours | Amount |
|----------|--------------------|-------------|-------|----------|
| 08/06/16 | Kochsiek, Blythe | [REDACTED] | 2.40 | 840.00 |
| 08/08/16 | Kochsiek, Blythe | [REDACTED] | 0.20 | 70.00 |
| 08/08/16 | Kochsiek, Blythe | [REDACTED] | 2.10 | 735.00 |
| 08/08/16 | MacDonald, Hugh A. | [REDACTED] | 0.60 | 129.00 |
| 08/08/16 | MacDonald, Hugh A. | [REDACTED] | 1.40 | 301.00 |
| 08/08/16 | MacDonald, Hugh A. | [REDACTED] | 2.40 | 516.00 |
| 08/08/16 | Welsh Robert C | [REDACTED] | 3.10 | 2,092.50 |
| 08/09/16 | Kochsiek, Blythe | [REDACTED] | 1.30 | 455.00 |
| 08/09/16 | MacDonald, Hugh A. | [REDACTED] | 5.10 | 1,096.50 |

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9-16-2016 PRA 000040
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Tulare Local Healthcare District

REDACTED

Invoice Date: 09/13/16
Invoice Number: 50286847
Matter Number: 093734.000015
Page 5

| Date | Name | Description | Hours | Amount |
|----------|--------------------|-------------|-------|----------|
| 08/09/16 | Welsh Robert C | [REDACTED] | 1.00 | 675.00 |
| 08/10/16 | Kochsiek, Blythe | [REDACTED] | 1.20 | 420.00 |
| 08/10/16 | Kochsiek, Blythe | [REDACTED] | 0.30 | 105.00 |
| 08/10/16 | Kochsiek, Blythe | [REDACTED] | 1.20 | 420.00 |
| 08/10/16 | MacDonald, Hugh A. | [REDACTED] | 0.10 | 21.50 |
| 08/10/16 | Welsh Robert C | [REDACTED] | 3.90 | 2,632.50 |
| 08/11/16 | Kochsiek, Blythe | [REDACTED] | 0.40 | 140.00 |
| 08/11/16 | Welsh Robert C | [REDACTED] | 7.60 | 5,130.00 |
| 08/12/16 | Kochsiek, Blythe | [REDACTED] | 0.30 | 105.00 |
| 08/12/16 | Welsh Robert C | [REDACTED] | 0.20 | 135.00 |

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9-16-2016 PRA 000041
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Washington, DC

Tulare Local Healthcare District

REDACTED

Invoice Date:
Invoice Number:
Matter Number:

09/13/16
50286847
093734.000015
Page 6

| Date | Name | Description | Hours | Amount |
|----------|--------------------|-------------|-------|--------|
| | | [REDACTED] | | |
| 08/16/16 | MacDonald, Hugh A. | [REDACTED] | 0.70 | 150.50 |
| 08/25/16 | Kochsiek, Blythe | [REDACTED] | 0.10 | 35.00 |
| | | [REDACTED] | | |
| 08/26/16 | Kochsiek, Blythe | [REDACTED] | 0.50 | 175.00 |
| | | [REDACTED] | | |
| 08/26/16 | Welsh Robert C | [REDACTED] | 1.30 | 877.50 |
| | | [REDACTED] | | |
| 08/29/16 | Kochsiek, Blythe | [REDACTED] | 1.30 | 455.00 |
| | | [REDACTED] | | |
| 08/29/16 | Kochsiek, Blythe | [REDACTED] | 1.20 | 420.00 |
| | | [REDACTED] | | |
| 08/29/16 | Kochsiek, Blythe | [REDACTED] | 0.50 | 175.00 |
| | | [REDACTED] | | |
| 08/29/16 | Kochsiek, Blythe | [REDACTED] | 1.30 | 455.00 |

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Tulare Local Healthcare District

REDACTED

Invoice Date:
Invoice Number:
Matter Number:

09/13/16
50286847
093734.000015
Page 7

| Date | Name | Description | Hours | Amount |
|----------|--------------------|-------------|-------|-----------|
| | | [REDACTED] | | |
| 08/29/16 | Kochsiek, Blythe | [REDACTED] | 0.20 | 70.00 |
| 08/29/16 | MacDonald, Hugh A. | [REDACTED] | 0.60 | 129.00 |
| 08/29/16 | Welsh Robert C | [REDACTED] | 1.30 | 877.50 |
| | | [REDACTED] | | |
| 08/30/16 | Kochsiek, Blythe | [REDACTED] | 1.30 | 455.00 |
| | | [REDACTED] | | |
| 08/31/16 | Kochsiek, Blythe | [REDACTED] | 1.50 | 525.00 |
| | | [REDACTED] | | |
| 08/31/16 | Kochsiek, Blythe | [REDACTED] | 0.20 | 70.00 |
| | | [REDACTED] | | |
| 08/31/16 | MacDonald, Hugh A. | [REDACTED] | 0.40 | 86.00 |
| 08/31/16 | Welsh Robert C | [REDACTED] | 0.30 | 202.50 |
| | | [REDACTED] | | |
| Total | | | 56.60 | 24,480.00 |

Expenses and Other Charges

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Washington, DC

Tulare Local Healthcare District

REDACTED

Invoice Date:
Invoice Number:
Matter Number:

09/13/16
50286847
093734.000015
Page 8

| | | |
|----------|------------|--------|
| 08/10/16 | [REDACTED] | 34.69 |
| 08/10/16 | [REDACTED] | 13.91 |
| 08/10/16 | [REDACTED] | 8.00 |
| 08/11/16 | [REDACTED] | 16.07 |
| | [REDACTED] | 72.67 |
| 08/10/16 | [REDACTED] | 208.05 |
| | [REDACTED] | 208.05 |
| 08/12/16 | [REDACTED] | 180.00 |
| | [REDACTED] | 180.00 |
| 08/25/16 | [REDACTED] | 500.00 |
| | [REDACTED] | 500.00 |
| 07/21/16 | [REDACTED] | 86.00 |
| 07/31/16 | [REDACTED] | 593.55 |
| | [REDACTED] | 679.55 |
| 07/29/16 | [REDACTED] | 14.72 |
| 07/29/16 | [REDACTED] | 18.33 |
| 08/15/16 | [REDACTED] | 20.57 |

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Tulare Local Healthcare District

REDACTED

Invoice Date:
Invoice Number:
Matter Number:

09/13/16
50286847
093734.000015
Page 9

08/15/16 [REDACTED] 20.57

74.19

08/05/16

14.20

08/08/16

11.00

08/09/16

3.30

08/26/16

3.70

32.20

08/09/16

51.36

08/29/16

75.04

08/30/16

35.52

08/31/16

143.92

305.84

08/10/16

3.00

08/10/16

2.00

08/10/16

5.00

08/10/16

34.00

44.00

Total \$ 2,096.50

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Denver
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Tulare Local Healthcare District

Invoice Date: 09/13/16
Invoice Number: 50286847
Matter Number: 093734.000015
Page 10

ACCOUNT SUMMARY

| Invoice Date | Invoice Number | Original Amount | Last Payment Date | Total Payments Applied | Last Adjustment Date | Total Adjustment Applied | A/R Balance |
|--------------|----------------|-----------------|-------------------|------------------------|----------------------|--------------------------|-------------|
| 04/28/16 | 50236648 | \$ 16,618.50 | | \$ 0.00 | | \$ | 16,618.50 |
| 05/09/16 | 50239542 | 8,100.00 | | 0.00 | | | 8,100.00 |
| 06/14/16 | 50253384 | 2,212.50 | | 0.00 | | | 2,212.50 |
| 07/13/16 | 50264274 | 894.15 | | 0.00 | | | 894.15 |
| 08/18/16 | 50278646 | 43,812.19 | | 0.00 | | | 43,812.19 |
| Total | | \$ 71,637.34 | | \$ 0.00 | | \$ | 71,637.34 |

Account Receivable Balance

This Invoice

Total Due Including current invoice

\$ 71,637.34
\$ 26,576.50
\$ 98,213.84

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