

**U.S. District Court  
District of Columbia (Washington, DC)  
CIVIL DOCKET FOR CASE #: 1:23-cv-03907-JMC**

HOLLAND LAW FIRM et al v. U.S. DEPARTMENT OF  
HEALTH AND HUMAN SERVICES et al  
Assigned to: Judge Jia M. Cobb  
Cause: 05:552 Freedom of Information Act

Date Filed: 12/29/2023  
Jury Demand: None  
Nature of Suit: 895 Freedom of  
Information Act  
Jurisdiction: U.S. Government Defendant

**Plaintiff**

**HOLLAND LAW FIRM**

represented by **James Woodside Orth , I**  
NELSON MULLINS RILEY &  
SCARBOROUGH LLP  
New York  
330 Madison Avenue  
27th Floor  
New York, NY 10017  
267-229-6029  
Email: [james.orth@nelsonmullins.com](mailto:james.orth@nelsonmullins.com)  
*ATTORNEY TO BE NOTICED*

**Rebecca Lecaroz**  
BROWN, RUDNICK LLP  
One Financial Center  
Boston, MA 02111  
617-856-8200  
Email: [rlucaroz@brownrudnick.com](mailto:rlucaroz@brownrudnick.com)  
*PRO HAC VICE*  
*ATTORNEY TO BE NOTICED*

**Charles Munn**  
NELSON MULLINS RILEY &  
SCARBOROUGH LLP  
One Wells Fargo Center  
23rd Floor  
301 South College Street  
Charlotte, NC 28202  
704-417-3014  
Email: [charles.munn@nelsonmullins.com](mailto:charles.munn@nelsonmullins.com)  
*ATTORNEY TO BE NOTICED*

**Plaintiff**

**LANIER LAW FIRM**

represented by **James Woodside Orth , I**  
(See above for address)  
*ATTORNEY TO BE NOTICED*

**Rebecca Lecaroz**  
(See above for address)  
*ATTORNEY TO BE NOTICED*

**Charles Munn**  
(See above for address)  
*ATTORNEY TO BE NOTICED*

V.

**Defendant**

**U.S. DEPARTMENT OF HEALTH  
AND HUMAN SERVICES**

represented by **Tabitha Bartholomew**  
DOJ-USAO

Civil Division  
601 D Street NW  
Washington, DC 20530  
202-252-2529  
Email: [tabitha.bartholomew@usdoj.gov](mailto:tabitha.bartholomew@usdoj.gov)  
**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED**

**Defendant**

**CENTERS FOR MEDICARE AND  
MEDICAID SERVICES**

represented by **Tabitha Bartholomew**  
(See above for address)  
**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED**

Date Filed	#	Docket Text
12/29/2023	<u>1</u>	COMPLAINT against CENTERS FOR MEDICARE AND MEDICAID SERVICES, U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES ( Filing fee \$ 405 receipt number ADCDC-10587205) filed by HOLLAND LAW FIRM, LANIER LAW FRM. (Attachments: # <u>1</u> Exhibit A – Freedom of Information Act Request dated July 20, 2023, # <u>2</u> Exhibit B – CMS Response dated July 28, 2023, # <u>3</u> Civil Cover Sheet, # <u>4</u> Summons – U.S. Department of Health and Human Services, # <u>5</u> Summons – Centers for Medicare and Medicaid Services)(Munn, Charles) (Entered: 12/29/2023)
12/29/2023	<u>2</u>	LCvR 26.1 CERTIFICATE OF DISCLOSURE of Corporate Affiliations and Financial Interests by HOLLAND LAW FIRM, LANIER LAW FRM (Munn, Charles) (Entered: 12/29/2023)
12/29/2023	<u>3</u>	NOTICE of Appearance by James Woodside Orth, I on behalf of HOLLAND LAW FIRM, LANIER LAW FRM (Orth, James) (Entered: 12/29/2023)
12/29/2023	<u>4</u>	MOTION for Leave to Appear Pro Hac Vice :Attorney Name– Rebecca MacDowell Lecaroz, Filing fee \$ 100, receipt number ADCDC-10587587. Fee Status: Fee Paid. by HOLLAND LAW FIRM, LANIER LAW FRM. (Attachments: # <u>1</u> Declaration of Rebecca MacDowell Lecaroz, # <u>2</u> Exhibit A – certificate of good standing)(Munn, Charles) (Entered: 12/29/2023)
12/29/2023	<u>5</u>	MOTION to Expedite <i>Motion to Set Expedited Scheduling Order</i> by HOLLAND LAW FIRM, LANIER LAW FRM. (Munn, Charles) (Entered: 12/29/2023)
01/03/2024		NOTICE OF ERROR re <u>1</u> Complaint; emailed to cmunn@brownrudnick.com, cc'd 2 associated attorneys -- The PDF file you docketed contained errors: 1. Noncompliance with LCvR 5.1(c). Please file an errata correcting the initiating pleading to include the name & full residence address of each party using the event Errata., 2. <b>COMPLIANCE DEADLINE is by close of business today. This case will not proceed any further until all errors are satisfied.</b> (zsl, ) (Entered: 01/03/2024)
01/03/2024	<u>6</u>	ERRATA <i>Corrected Complaint to comply with LCvR 5.1(c)</i> by HOLLAND LAW FIRM, LANIER LAW FIRM re <u>1</u> Complaint,, (Munn, Charles) (Entered: 01/03/2024)
01/04/2024		Case Assigned to Judge Jia M. Cobb. (zljn) (Entered: 01/04/2024)
01/04/2024	<u>7</u>	SUMMONS (2) Issued Electronically as to CENTERS FOR MEDICARE AND MEDICAID SERVICES, U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES. (zljn) (Entered: 01/04/2024)
01/04/2024		NOTICE OF ERROR re <u>1</u> Complaint; emailed to cmunn@brownrudnick.com, cc'd 3 associated attorneys -- The PDF file you docketed contained errors: 1. Missing summonses–government. When naming a government agent or agency as a defendant, you must supply a summons for each defendant & two additional summonses for the U.S. Attorney & U.S. Attorney General. Please submit using the event Request for Summons to Issue. (zljn, ) (Entered: 01/04/2024)
01/04/2024	<u>8</u>	REQUEST FOR SUMMONS TO ISSUE <i>to Attorney General of the United States and US Attorney's Office</i> filed by HOLLAND LAW FIRM, LANIER LAW FIRM.(Munn,

		Charles) (Entered: 01/04/2024)
01/05/2024	<u>9</u>	SUMMONS (2) Issued Electronically as to U.S. Attorney and U.S. Attorney General (znmw) (Entered: 01/05/2024)
01/08/2024		MINUTE ORDER granting <u>4</u> Motion for Leave to Appear Pro Hac Vice: <b>Counsel should register for e-filing via PACER and file a notice of appearance pursuant to LCvR 83.6(a) <a href="#">Click for instructions</a></b> . Signed by Judge Jia M. Cobb on January 8, 2024. (lcjmc3) (Entered: 01/08/2024)
01/18/2024	<u>10</u>	NOTICE of Appearance by Rebecca Lecaroz on behalf of HOLLAND LAW FIRM, LANIER LAW FIRM (Lecaroz, Rebecca) (Entered: 01/18/2024)
01/24/2024	<u>11</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed on United States Attorney General. Date of Service Upon United States Attorney General January 8, 2024. (Munn, Charles) (Entered: 01/24/2024)
01/24/2024	<u>12</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed as to the United States Attorney. Date of Service Upon United States Attorney on 1/8/2024. Answer due for ALL FEDERAL DEFENDANTS by 2/7/2024. (Munn, Charles) (Entered: 01/24/2024)
01/24/2024	<u>13</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed. CENTERS FOR MEDICARE AND MEDICAID SERVICES served on 1/11/2024 (Munn, Charles) (Entered: 01/24/2024)
01/24/2024	<u>14</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed. U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES served on 1/10/2024 (Munn, Charles) (Entered: 01/24/2024)
02/05/2024	<u>15</u>	NOTICE of Appearance by Tabitha Bartholomew on behalf of All Defendants (Bartholomew, Tabitha) (Entered: 02/05/2024)
02/05/2024	<u>16</u>	Consent MOTION for Extension of Time to File Answer re <u>1</u> Complaint,, by CENTERS FOR MEDICARE AND MEDICAID SERVICES, U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES. (Bartholomew, Tabitha) (Entered: 02/05/2024)
02/06/2024		MINUTE ORDER granting <u>16</u> Motion for Extension of Time to Answer: In light of the consent motion, and finding good cause, the motion is GRANTED. Defendants' Answer is due March 8, 2024. Signed by Judge Jia M. Cobb on February 6, 2024. (lcjmc3) (Entered: 02/06/2024)
03/05/2024	<u>17</u>	Consent MOTION for Extension of Time to File Answer re <u>1</u> Complaint,, by CENTERS FOR MEDICARE AND MEDICAID SERVICES, U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES. (Bartholomew, Tabitha) (Entered: 03/05/2024)
03/05/2024		MINUTE ORDER granting <u>17</u> Motion for Extension of Time to Answer: In light of the consent motion, and finding good cause, the motion is GRANTED. Defendants' answer is due June 7, 2024. Signed by Judge Jia M. Cobb on March 5, 2024. (lcjmc3) (Entered: 03/05/2024)
03/25/2024		MINUTE ORDER finding as moot <u>5</u> Motion to Expedite: In light of the consent motions to extend the Defendants' time to Answer, the Court FINDS AS MOOT the Motion to Expedite. Signed by Judge Jia M. Cobb on March 25, 2024. (lcjmc3) (Entered: 03/25/2024)
04/12/2024	<u>18</u>	NOTICE of Change of Address by Charles Munn (Munn, Charles) (Entered: 04/12/2024)
04/12/2024	<u>19</u>	NOTICE of Change of Address by James Woodside Orth, I (Orth, James) (Entered: 04/12/2024)
06/05/2024	<u>20</u>	Consent MOTION for Extension of Time to File Answer re <u>1</u> Complaint,, by CENTERS FOR MEDICARE AND MEDICAID SERVICES, U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES. (Bartholomew, Tabitha) (Entered: 06/05/2024)

06/10/2024		MINUTE ORDER granting <u>20</u> motion for extension: In light of the consent motion, and finding good cause, the motion is GRANTED. Defendants' answer is due August 9, 2024. Signed by Judge Jia M. Cobb on June 10, 2024. (lcjmc3) (Entered: 06/10/2024)
08/09/2024	<u>21</u>	Consent MOTION for Extension of Time to File Answer by CENTERS FOR MEDICARE AND MEDICAID SERVICES, U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES. (Bartholomew, Tabitha) (Entered: 08/09/2024)
08/13/2024		MINUTE ORDER granting <u>21</u> Motion for Extension: Having considered the motion, and for good cause shown, the Court GRANTS the motion. It is further ORDERED that Defendants shall respond to the complaint in this action by September 9, 2024. Signed by Judge Jia M. Cobb on August 13, 2024. (lcjmc3) (Entered: 08/13/2024)
09/09/2024	<u>22</u>	Consent MOTION for Extension of Time to File Answer re <u>1</u> Complaint,, by CENTERS FOR MEDICARE AND MEDICAID SERVICES, U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES. (Bartholomew, Tabitha) (Entered: 09/09/2024)
09/10/2024		MINUTE ORDER granting <u>22</u> Motion for Extension of Time to Answer: Having considered the motion, and for good cause shown, the Court GRANTS the motion. It is further ORDERED that Defendants shall respond to the complaint in this action by November 8, 2024. Signed by Judge Jia M. Cobb on September 10, 2024. (lcjmc3) (Entered: 09/10/2024)