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| ARAPAHOE COUNTY DISTRICT COURT STATE OF COLORADO | DATE FILED: March 11, 2019 1:44 PM  FILING ID: 281130431B067 CASE NUMBER: 2019CV30584 |
| Court Address:  7325 South Potomac Street Centennial, Colorado 80112 | Court Use Only |
| **Plaintiff(s):** |  |
| **Defendant(s):** | Case Number: |
| *Attorneys for Plaintiffs*  ADDRESS:  Phone Number:  Fax Number: | Division/ Courtroom: |
| **COMPLAINT FOR DECLARATORY JUDGMENT** | |

**COMES NOW,** the Plaintiff, Casey Garrett-Taylor, by and through her attorneys Anderson Hemmat, LLC, and for her Complaint for Declaratory Judgment against the Defendants Centura Health Meridian Emergency and Urgent Care and RevSolve, Inc., alleges and avers as follows:

# PARTIES, VENUE AND JURISDICTION

1. At all times relevant hereto, Plaintiff Casey Garrett-Taylor (hereinafter “Plaintiff”) was a resident and domiciliary of the City and County of Arapahoe, State of Colorado, with a mailing address of 7640 West Grand Avenue, Littleton, Colorado 80123.
2. At all times relevant hereto Defendant PAHS Emergency and Urgent Care Centers, LLC d/b/a Centura Health Meridian Emergency and Urgent Care (hereafter “Defendant

Centura”) is a Colorado limited liability company registered to conduct business in the State of Colorado.

1. At all times relevant hereto Defendant RevSolve, Inc. (hereafter “Defendant RevSolve”) is a Colorado foreign corporation registered to conduct business in the State of Colorado.
2. Pursuant to C.R.C.P. 98(c), venue is proper in Arapahoe County, State of Colorado, as it is the location of money being held in Plaintiff counsel’s trust account pending the outcome of this action.
3. This Court has jurisdiction over this Complaint for Declaratory Judgment pursuant to C.R.S. § 13-51-101, *et. seq.*, and C.R.C.P. 57.

# FACTUAL ALLEGATIONS

1. Plaintiff incorporates herein by this reference all allegations contained in Paragraphs 1 through 5 of this Complaint, as if set forth *verbatim*.
2. On May 3, 2018, Plaintiff experienced a sore throat with a slight fever and went to Centura Health Meridian Emergency and Urgent Care.
3. On this same date, Defendant Centura drew blood from Plaintiff.
4. Defendant Centura billed Plaintiff $6,086.21 for medical services.
5. Plaintiff’s health insurance paid agreed amounts to Defendants.
6. Despite accepting health insurance payments, Defendant Centura continue to maintain outstanding balances suggesting Plaintiff’s continued indebtedness.
7. Defendant Centura turned over the outstanding balance of $2,434.48 to RevSolve, Inc. to collect the debt.

# FIRST CLAIM FOR RELIEF

**Declaratory Judgment**

1. Plaintiff seeks a declaratory judgment based on the reasonable determination of usual and customary charges by medical professionals for the medical care provided to Plaintiff in accordance with C.R.C.P. Rule 57(b).
2. Plaintiff is an interested party consistent with C.R.C.P. 57(d).
3. Accordingly, Plaintiff prays for a declaratory judgment of the appropriate value of the medical expenses.

WHEREFORE, Plaintiff prays for relief all is as more particularly hereinafter set forth.

WHEREFORE, Plaintiff requests this Court Order to determine what, if any, outstanding charges are or should be Plaintiff’s responsibility consistent with Rule 57 for ultimate declaratory relief and for such other and further relief as to the Court appears proper in the premises.

Respectfully submitted this 11th day of March, 2019.

ANDERSON HEMMAT, LLC

*s/ Chad P. Hemmat*

Chad P. Hemmat, No. 20845

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Attorneys for Plaintiff

Plaintiff’s Address:

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