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9 Attorneys for Plaintiffs

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

11 **COUNTY OF ORANGE**

Assigned for All Purposes
Judge James Crandall

12 THE DISCOVERY HOUSE, LLC, a
13 California limited liability company;
DISCOVERY TRANSITIONS
14 OUTPATIENT, INC., a California
corporation; DHP HEIGHTS, LLC, doing
15 business as CIRCLE OF HOPE, a California
limited liability company; MT GOLDEN
16 CORPORATION, doing business as
ADJUSTMENTS FAMILY SERVICES, a
17 California corporation; MT PROCESS LLC,
doing business as DIVINE DETOX, a
18 California limited liability company;

19 Plaintiffs,

20 v.

21 ANTHEM BLUE CROSS LIFE AND
HEALTH INSURANCE COMPANY, a
22 California corporation;
ANTHEM INC., an Indiana corporation doing
23 business in California as ANTHEM
HEALTH, INC.;
24 THE ANTHEM COMPANIES OF
CALIFORNIA, a California corporation;
25 THE ANTHEM COMPANIES, INC., an
Indiana corporation;
26 ANTHEM INSURANCE COMPANIES,
INC., an Indiana corporation;
27 BLUE CROSS OF CALIFORNIA, a
California corporation;
28 BLUE CROSS AND BLUE SHIELD

Case No.: 30-2021-01179856-CU-BC-CJC

COMPLAINT FOR:

1. **CLAIMS FOR PLAN BENEFITS UNDER ERISA, 29 U.S.C. §1132(a)(1)(B)**
2. **BREACH OF WRITTEN CONTRACT**
3. **BREACH OF IMPLIED COVENANT OF GOOD FAITH AND FAIR DEALING**
4. **BREACH OF IMPLIED CONTRACT**
5. **BREACH OF ORAL CONTRACT**
6. **PROMISSORY ESTOPPEL**
7. **UNFAIR COMPETITION**

DEMAND FOR JURY TRIAL

1 ASSOCIATION, an Illinois corporation;
2 VIANT, INC., a Nevada corporation;
3 MULTIPLAN, INC., a New York
corporation; and
4 DOES 1 through 100, inclusive,
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Defendants.

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1 Plaintiffs The Discovery House, LLC (“Discovery House”), Discovery Transitions
 2 Outpatient, Inc. (“Discovery Transitions”), DHP Heights, LLC *doing business as* Circle of Hope
 3 (“DHP Heights”), MT Golden Corporation *doing business as* Adjustments Family Services (“MT
 4 Golden”), and MT Process, LLC *doing business as* Divine Detox (“MT Process”) (collectively
 5 “Plaintiffs”) hereby allege against Defendants Anthem Blue Cross Life and Health Insurance
 6 Company, Anthem Inc., doing business in California as Anthem Health, Inc., The Anthem
 7 Companies of California, The Anthem Companies, Inc., Anthem Insurance Companies, Inc., Blue
 8 Cross of California, Blue Cross and Blue Shield Association, Viant, Inc., Multiplan, Inc., and
 9 Does 1 through 100, (collectively “Defendants”) as follows:

THE PARTIES

The Plaintiffs

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 12 1. **Discovery House** (TIN 90-0852664) is, and at all relevant times herein mentioned
 13 was, a California limited liability company, qualified to do business in the State of California.
 14 Discovery House is, and at all relevant times herein was, a mental health and alcoholism and
 15 substance use disorder treatment provider with its principal place of business in Los Angeles
 16 County, California. Discovery House is in the profession of helping individuals recover from
 17 alcoholism and addiction and return to their families and communities as productive and
 18 contributing members of society. Discovery House is, and at all relevant times herein was,
 19 certified and/or licensed by the California Department of Health Care Services (“DHCS”) to
 20 operate alcoholism and substance use disorder residential and detoxification treatment programs,
 21 including to provide incidental medical services (“IMS”). Discovery House is, and at all relevant
 22 times herein was, accredited by The Joint Commission, Behavioral Health Care Accreditation
 23 Program (“JCAHO”), and has a Centers for Medicare and Medicaid Services (“CMS”), Clinical
 24 Laboratory Improvements Amendments (“CLIA”) certificate of waiver.

25 2. **Discovery Transitions** (TIN 82-1366868) is, and at all relevant times herein
 26 mentioned was, a California corporation, qualified to do business in the State of California.
 27 Discovery Transitions is a substance use disorder treatment provider. Discovery Transitions is in
 28 the profession of helping individuals recover from alcoholism and addiction and return to their

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1 families and communities as productive and contributing members of society. Discovery
2 Transitions is, and at all relevant times herein was, certified by the California Department of
3 Health Care Services (“DHCS”) to operate a substance use disorder outpatient treatment program.
4 Discovery Transitions is, and at all relevant times herein was, accredited by The Joint
5 Commission, Behavioral Health Care Accreditation Program (“JCAHO”), and holds a Centers for
6 Medicare and Medicaid Services (“CMS”), Clinical Laboratory Improvements Amendments
7 (“CLIA”) certificate of waiver.

8 3. **DHP Heights** (TIN 82-4178957) is, and at all relevant times herein mentioned was,
9 a California limited liability company, qualified to do business in the State of California. DHP
10 Heights is a substance use disorder treatment provider. DHP Heights is in the profession of
11 helping individuals recover from alcoholism and addiction and return to their families and
12 communities as productive and contributing members of society. DHP Heights is, and at all
13 relevant times herein was, certified and/or licensed by the California Department of Health Care
14 Services (“DHCS”) to operate substance use disorder inpatient and detoxification treatment
15 programs, including to provide incidental medical services (“IMS”). DHP Heights is, and at all
16 relevant times herein was, accredited by The Joint Commission, Behavioral Health Care
17 Accreditation Program (“JCAHO”), and holds a Centers for Medicare and Medicaid Services
18 (“CMS”), Clinical Laboratory Improvements Amendments (“CLIA”) certificate of waiver.

19 4. **MT Golden** (TIN 82-4823403) is, and at all relevant times herein mentioned was, a
20 California corporation, qualified to do business in the State of California. MT Golden is a
21 substance use disorder treatment provider. MT Golden is in the profession of helping individuals
22 recover from alcoholism and addiction and return to their families and communities as productive
23 and contributing members of society. MT Golden is, and at all relevant times herein was, certified
24 by the California Department of Health Care Services (“DHCS”) to operate a substance use
25 disorder outpatient treatment program. MT Golden is, and at all relevant times herein was,
26 accredited by The Joint Commission, Behavioral Health Care Accreditation Program (“JCAHO”),
27 and holds a Centers for Medicare and Medicaid Services (“CMS”), Clinical Laboratory
28 Improvements Amendments (“CLIA”) certificate of waiver.

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