

EXHIBIT A

IN THE CIRCUIT COURT OF THE 11TH JUDICIAL CIRCUIT
IN AND FOR MIAMI-DADE COUNTY, FLORIDA

GENERAL JURISDICTION DIVISION



Ernest D. Moody, CPS #229
2nd Judicial Circuit of Florida

Date: 11/1/21 Time: 10:48am

JOEL SCHECHTER,

Plaintiff,

vs.

Case No.: 2021-020715-CA-01

CAREPLUS HEALTH PLANS, INC.,
a Florida corporation,

Defendant.

SUMMONS

TO: CAREPLUS HEALTH PLANS, INC.
Through its Registered Agent, Corporation Service Company
1201 Hays Street
Tallahassee, FL 32301-2525

You have 20 calendar days after this summons is served on you to file a written response to the attached Complaint in this Court. If you do not file your response on time, you may lose the case, and your wages, money, and property may thereafter be taken without further warning from the Court. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the phone book).

If you choose to file a written response yourself, at the same time you file your written response to the Court, located at:

73 West Flagler Street
Miami, FL 33130

you must also mail or take a carbon copy or photocopy of your written response to the "Plaintiff/Plaintiff's Attorney" named below:

whose address is:

BRAD E. KELSKY, ESQ.
KELSKY LAW, P.A.
150 S. Pine Island Road, Suite 300
Plantation, FL 33324
Telephone: 954.449.1400
Fax: 954.449.8986
Primary: bradkelsky@kelskylaw.com
Secondary: barbarallinas@kelskylaw.com

THE STATE OF FLORIDA

TO EACH SHERIFF OF THE STATE: *You are commanded to serve this Summons and a copy of the Complaint on the above-named Defendant.*

DATED ON 10/25/2021

(SEAL)

Harvey Ruvin, Esq.
CLERK OF THE CIRCUIT COURT

By: _____



219401

IMPORTANT

A lawsuit has been filed against you. You have twenty (20) calendar days after this Summons is served on you to file a written response to the attached Complaint with the Clerk of this Court. A phone call will not protect you. Your written response, including the case number given above and the names of the parties, must be filed if you want the Court to hear your side of the case. If you do not file your response on time, you may lose the case, and your wages, money, and property may thereafter be taken without further warning from the Court. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the phone book).

If you choose to file a written response yourself, at the same time you file your written response to the Court you must also mail or take a copy of your written response to the "Plaintiff/Plaintiff's Attorney" named below.

IMPORTANTE

Usted ha sido demandado legalmente. Tiene veinte (20) días, contados a partir del recibo de esta notificación, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefónica no lo protegerá. Si usted desea que el tribunal considere su defensa, debe presentar su respuesta por escrito, incluyendo el número del caso y los nombres de las partes interesadas. Si usted no contesta la demanda a tiempo, pudiese perder el caso y podría ser despojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea, puede usted consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guía telefónica.

Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, deberá usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff's Attorney" (Demandante o Abogado del Demandante).

IMPORTANT

Des poursuites judiciaires ont été entreprises contre vous. Vous avez vingt (20) jours consécutifs à partir de la date de l'assignation de cette citation pour déposer une réponse écrite à la plainte ci-jointe auprès de ce tribunal. Un simple coup de téléphone est insuffisant pour vous protéger. Vous êtes obligés de déposer votre réponse écrite, avec mention du numéro de dossier ci-dessus et du nom des parties nommées ici, si vous souhaitez que le tribunal entende votre cause. Si vous ne déposez pas votre réponse écrite dans le délai requis, vous risquez de perdre la cause ainsi que votre salaire, votre argent, et vos biens peuvent être saisis par la suite, sans aucun préavis ultérieur du tribunal. Il y a d'autres obligations juridiques et vous pouvez requérir les services immédiats d'un avocat. Si vous ne connaissez pas d'avocat, vous pourriez téléphoner à un service de référence d'avocats ou à un bureau d'assistance juridique (figurant à l'annuaire de téléphones).

Si vous choisissez de déposer vous-même une réponse écrite, il vous faudra également, en même temps que cette formalité, faire parvenir ou expédier une copie de votre réponse écrite au "Plaintiff/Plaintiff's Attorney" (Plaignant ou à son avocat) nommé ci-dessous.

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Plaintiff,

vs.

Case No.: _____

CAREPLUS HEALTH PLANS, INC.,
a Florida corporation,

Defendant.

COMPLAINT FOR DAMAGES AND DEMAND FOR JURY TRIAL

Plaintiff, JOEL SCHECHTER, sues the Defendant, CAREPLUS HEALTH PLANS, INC., a Florida corporation, and states as follows:

1. This is a cause of action exceeding the Court's minimum jurisdictional limits of Thirty Thousand (\$30,000.00) dollars exclusive of costs, prejudgment interest and attorney's fees.
2. At all times material hereto, Plaintiff was *sui juris*.
3. At all times material hereto, Defendant, CAREPLUS HEALTH PLANS, INC., was and is a corporation organized under the laws of the State of Florida that maintained an office for the regular transaction of business in Miami-Dade County, Florida.
4. Venue is appropriate in this Court as the Defendant resides in Miami-Dade County, Florida.
5. In response to a television advertisement, Plaintiff, JOEL SCHECHTER, in approximately December 2019, contacted a CarePlus Health Plans, Inc., employee and/or agent to discuss the possibility of enrolling in a CarePlus Health Plan.

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