

Exhibit A

**HYDERALLY & ASSOCIATES, P.C.**  
33 PLYMOUTH STREET, SUITE 202  
MONTCLAIR, NEW JERSEY 07042  
TELEPHONE (973) 509-8500  
FACSIMILE (973)509-8501  
Attorneys for Plaintiff, Michelle Ferreira

Came To Hand: 4/4/2022  
Delivered: 4/6/2022  
By: Betsy Mese

**MICHELLE FERREIRA,**

**PLAINTIFF,**

**VS.**

**SALVASEN HEALTH, BLACKHAWK  
CLAIMS SERVICES, JOHN DOES 1-10,  
AND XYZ CORPS. 1-10,**

**DEFENDANTS.**

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION: HUDSON COUNTY  
DOCKET NO.: HUD-L-1103-22

CIVIL ACTION

SUMMONS

**BLACKHAWK CLAIMS SERVICES**

From The State of New Jersey To The Defendant(s) Named Above:

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (The address of each deputy clerk of the Superior Court is provided.) If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, P.O. Box 971, Trenton, NJ 08625-0971. A filing fee payable to the Treasurer, State of New Jersey and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee of \$175.00 and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live or the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529). A list of these offices is provided. If you do not have an attorney and are not eligible for free legal assistance, you may

obtain a referral to an attorney by calling one of the Lawyer Referral Services. A list of these numbers is also provided.

*Michelle M. Smith, Esq.*

Michelle M. Smith, Esq.,  
Clerk of the Superior Court

DATED: April 4, 2022

Name of Defendant to be served:

**BLACKHAWK CLAIMS SERVICES**

Address of the Defendant to be served:

**11111 Richmond Avenue  
Suite 215  
Houston, TX 77082**

Phone Number:

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SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION: HUDSON COUNTY

CIVIL ACTION

**COMPLAINT AND JURY DEMAND**

Plaintiff, Michelle Ferreira (“Ferreira” or “Plaintiff”), who resides at 361 Highland Avenue, Kearny, New Jersey, 07032, Hudson County, by way of this Complaint against the Defendants, Salvasen Health, Blackhawk Claims Services, John Does 1-10, and XYZ Corps. 1-10 (hereinafter collectively “Defendants”) hereby says:

**I. Nature of Action, Jurisdiction, and Venue**

1. This is an action seeking equitable and legal relief for: (1) breach of express contract; (2) breach of implied covenant of good faith and fair dealing; (3) breach of implied contract; (4) fraud; (5) fraudulent inducement; (6) detrimental reliance; and (7) a violation of the New Jersey Consumer Fraud Act, N.J.S.A. 56:8 *et seq.*
2. Under Rule 4:4-4, this court has specific jurisdiction due to Defendants’ contacts with New Jersey, the nature of the action and the amount in controversy. Additionally, Plaintiff has satisfied all prerequisites, and exhausted administrative remedies, prior to bringing these claims.
3. Venue is appropriate in that the illegal and improper acts which are the basis for the within asserted cause(s) of action occurred within the State of New Jersey, and the Defendants in

this matter are the entities or organizations located within the State of Texas doing business in New Jersey under color of law.

## **II. Parties**

4. Ferreira was a member of Defendants' health insurance plan.
5. Defendant, Salvasen Health ("Salvasen"), has its corporate office located at 10713 West Sam Houston North, Suite 100, Houston, TX 77064.
6. Defendant, Blackhawk Claims Services ("Blackhawk"), has its corporate office located at 11111 Richmond Avenue, Suite 215, Houston, TX 77082.
7. During the relevant time period, JOHN DOES 1-10 are currently unknown employees who aided and/or abetted in the commission of conduct complained of herein and/or who either acted within the scope of their employment at the workplace during working hours, or, to the extent they went beyond the scope of their employment, defendants ratified, embraced and added to this conduct. As the parties engage in discovery, plaintiff retains the right to amend the Complaint to add these individual employees by name.
8. During the relevant time period, XYZ Corps. 1-10 are unknown affiliated corporations or entities or other corporations who have liability for the claims set forth herein. As the parties engage in discovery, plaintiff retains the right to amend the Complaint to add these individual entities by name.
9. Thus, all defendants are subject to suit under the statutes alleged above.
10. At all times referred to in this Complaint, employees of the corporate defendants, who are referred to herein, were acting within the scope of their employment at the workplace during working hours, or, to the extent that they were not so acting, the corporate defendants ratified, embraced and added to their conduct.

## **III. Factual Allegations**

11. Defendants are in the business of providing healthcare insurance to residents located in New Jersey.
12. Defendants purposefully engage in business in New Jersey to provide health care coverage so that New Jersey residents can treat with medical providers in New Jersey.
13. In or about April, 2020, Ferreira contacted Defendants to inquire about obtaining individual health insurance in New Jersey.

14. Defendants advised that they were legally authorized to provide healthcare insurance to New Jersey residents to cover healthcare services in New Jersey.
15. Thus, Ferreira went forward with signing paperwork with Defendants to obtain healthcare insurance in New Jersey.
16. On or about April 24, 2020, Ferreira received confirmation of coverage via a debit from her bank account in New Jersey from Defendants in the amount of \$398.45.
17. Sometime after April 24, 2020, Ferreira called Defendants and spoke with a customer sales representative who confirmed that Ferreira's New Jersey healthcare coverage was effective as of May 1, 2020.
18. Defendants then sent Ferreira a New Jersey insurance card, with an effective date of May 1, 2020.
19. Defendants then began debiting Ferreira's New Jersey account biweekly, for \$105.45 and \$168.00 alternately.
20. This pattern of charges continued until October 27, 2020.
21. Beginning in or around October 26, 2020, based on Defendants' representation of coverage in New Jersey, Ferreira began seeing medical providers in New Jersey.
22. Ferreira treated with ZOV Medical from October, 2020 until May, 2021. (Exhibit "1").
23. Ferreira treated with Larry Shemen, MD, PC, in November, 2020. (Exhibit "2").
24. Ferreira treated with Brian Herschorn, MD in November, 2020. (Exhibit "3").
25. On November 30, 2020, Ferreira modified her coverage to include her spouse, Pedro Calisto ("Calisto").
26. From November 30, 2020 through February 26, 2021, Ferreira was debited \$459.00 monthly.
27. Ferreira was treated at Lenox Hill Hospital on November 6, 2020. (Exhibit "4").
28. Ferreira treated with The Dermatology Group in February, 2021 and March, 2021. (Exhibit "5").
29. Ferreira treated with Barnabas Health Multispecialty in February, 2021. (Exhibit "6").
30. Calisto treated with Summit Medical Group, PA in March, 2021. (Exhibit "7").
31. Calisto underwent surgery in August, 2021.

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