

STATE OF WISCONSIN**CIRCUIT COURT****LA CROSSE**

Brian Elder vs. Quartz Health Solutions, Inc.

**Electronic Filing
Notice**Case No. 2021CV000448
Class Code: Money JudgmentFILED
09-01-2021
Clerk of Circuit Court
La Crosse County WI
2021CV000448
Honorable Elliott M Levine
Branch 2QUARTZ HEALTH SOLUTIONS, INC.
840 CAROLINA STREET
SAUK CITY WI 53583

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If you have questions regarding this notice, please contact the Clerk of Circuit Court at 608-785-9590.

La Crosse County Circuit Court
Date: September 1, 2021

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STATE OF WISCONSIN

CIRCUIT COURT

LA CROSSE COUNTY

BRIAN ELDER,
2435 Lakeshore Drive
La Crosse, WI 54603,

Plaintiff,

Case No.

Case Code: 30301, 30307

vs.

QUARTZ HEALTH SOLUTIONS, INC.,
840 Carolina Street
Sauk City, WI 53583,

Defendant.

SUMMONS

THE STATE OF WISCONSIN, To the person named above as Defendant:

You are hereby notified that the Plaintiff named above has filed a lawsuit or other legal action against you. The Complaint which is attached, states the nature and basis of the legal action.

Within **forty-five (45) days**, you must respond with a written Answer, as that term is used in Chapter 802 of the Wisconsin Statutes, to the Complaint. The Court may reject or disregard an Answer that does not follow the requirements of the statutes. The Answer must be sent or delivered to the Court, at **La Crosse County Courthouse, 333 Vine Street, La Crosse, WI 54601** and to **James M. Burrows, Plaintiff's attorney**, whose address is listed below. You may have an attorney help or represent you.

If you do not provide a proper Answer within **forty-five (45) days**, the Court may grant judgment against you for the award of money or other legal action requested in the Complaint, and you may lose your right to object to anything that is or may be incorrect in the Complaint. A judgment may be enforced as provided by law. A judgment awarding money may become a lien against any real estate you own now or in the future, and may also be enforced by garnishment or seizure of property.

BOSSHARD PARKE Ltd.

s/ James M. Burrows _____

James M. Burrows

WI State Bar ID No. 1084705

jburrows@bosshardparkelaw.com

750 3rd Street N, Suite A

P.O. Box 966

La Crosse, WI 54602-0966

Telephone: (608) 782-1469

Attorneys for Plaintiff

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STATE OF WISCONSIN

CIRCUIT COURT

LA CROSSE COUNTY

BRIAN ELDER,
2435 Lakeshore Drive
La Crosse, WI 54603,

Plaintiff,

Case No.

Case Codes: 30301, 30701

vs.

QUARTZ HEALTH SOLUTIONS, INC.,
840 Carolina Street
Sauk City, WI 53583,

Defendant.

COMPLAINT

Plaintiff Brian Elder, by his attorneys, Bosshard Parke, Ltd., and as for his Complaint against Defendant Quartz Health Solutions, Inc., alleges as follows:

THE PARTIES

1. Plaintiff Brian Elder (“Plaintiff” or “Elder”) is an adult Wisconsin resident, residing at 2435 Lakeshore Drive, La Crosse, Wisconsin 54603.
2. Defendant Quartz Health Solutions, Inc. (“Defendant” or “Quartz”) is a Wisconsin corporation with, upon information and belief, a principal place of business located at 840 Carolina Street, Sauk City, Wisconsin 53583. Quartz is the insurer under a policy for health insurance covering Plaintiff.

JURISDICTION AND VENUE

3. The Court has general and specific jurisdiction over Defendant under Wis. Stat. §§ 801.05(1)(c), 801.05(5), and 801.05(10).
4. Venue is proper in La Crosse County under Wis. Stat. §§ 801.50(2)(a).

FACTUAL BACKGROUND

5. In the fall of 2019, Plaintiff was hospitalized at Gundersen Lutheran Medical Center in La Crosse, Wisconsin (“Gundersen”) with an infection.
6. Into his stay, on or about September 25, 2019, Gundersen staff attempted to discuss discharge planning—to a Skilled Nursing Facility (“SNF”)—with Plaintiff.
7. Due to his infection, Plaintiff would need to be discharged to SNF with a wound vac available for his use.

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