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December 19, 2019

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East Baton Rouge Parish Clerk of Court
P.O. Box 1991
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Via US Mail

RE: MEDICAL ASSISTANCE PROGRAMS EX REL.: J. R. vs. PLANNED PARENTHOOD GULF COAST, INC.

NO.: 666742 SEC. 22, 19TH JUDICIAL DISTRICT COURT, EAST BATON ROUGE PARISH, LOUISIANA

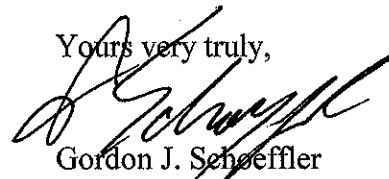
Dear Sir/Madame:

Enclosed please find an original and one copy of Qui Tam Plaintiff's Notice of Election to Proceed Individually in the above referenced matter. Please file the original into the records of your office, thereafter, issuing citation and service of the original Petition upon the defendant, Planned Parenthood Gulf Coast, Inc. as instructed on the enclosed pleadings. Further, please return the additional enclosed copy to our office stamped with the date and time of filing.

In accordance with LSA C.C.P. Article 1572, you are requested to give me written notice by mail ten (10) days in advance of the date fixed for the trial or hearing of the case, whether on exceptions, motions, rules or the merits. I also request immediate notice of all orders or judgments, whether interlocutory or final, made or rendered in this case upon the rendition thereof as provided by LSA C.C.P. Article 1913 and 1914, including notice of judgment in the event this case is taken under advisement, or if the judgment is not signed at the conclusion of the trial.

My office will be jointly prosecuting this case with the attorney, Joseph Joy, therefore, please allow this correspondence to serve as a request for written notice under La.C.C.P. Art. 1572, et seq, as detailed above on behalf Mr. Joy as well. Please take note that Attorney Richard T. Haik will no longer be acting as counsel in this matter. Your assistance in this matter is greatly appreciated and should you have any questions, please do not hesitate to contact the undersigned.

Yours very truly,



Gordon J. Schoeffler

cc: Attorney General Jeff Landry
all counsel of record

**MEDICAL ASSISTANCE
PROGRAMS EX REL.: J. R.**

19TH JUDICIAL DISTRICT COURT

DOCKET NO.: 666742 SEC. 22

VERSUS

**EAST BATON ROUGE PARISH,
LOUISIANA**

**PLANNED PARENTHOOD GULF
COAST, INC.**

**QUI TAM PLAINTIFF'S NOTICE OF ELECTION TO
PROCEED INDIVIDUALLY PURSUANT TO LA. R.S.46:439.2(B)(4)**

NOW COMES, through undersigned counsel, **J. R.**, as *Qui Tam Plaintiff* under the provisions of La. R.S. 46:439.1, a person of the full age of majority and resident of and domiciled in the State of Louisiana, Parish of Acadia, who alleges as follows:

1.

Qui Tam Plaintiff, **J. R.**, brought this civil action under the provisions of the Louisiana Medical Assistance Programs Integrity Law, La. R.S. 46:438.1, et seq. on or about February 28, 2018.

2.

The suit was filed under seal pursuant to law and served upon the Louisiana Attorney General's Office for its review. The Attorney General's Office has had the opportunity to review and investigate this matter pursuant to law, obtaining multiple extensions of time with which to intervene. Recently though, the Attorney General's Office has declined to intervene.

3.

The Attorney General sought and obtained an Order of Declination on November 15, 2019, thereby lifting the seal in this matter.

4.

Qui Tam Plaintiff hereby gives notice of his intent to proceed individually in his name and on behalf of the State of Louisiana pursuant to the provisions of LA. R.S.46:439.2(B)(4).

5.

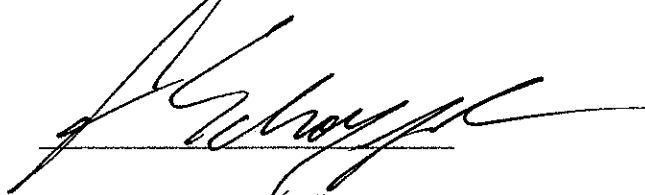
Accordingly, Plaintiff requests that the seal be lifted on this matter, and that the qui tam complaint, disclosure statement, and all written disclosure of substantially all material evidence and information submitted therewith be served upon **PLANNED PARENTHOOD GULF COAST, INC.** AND ITS CERTAIN UNIDENTIFIED EMPLOYEES at the following:

PLANNED PARENTHOOD GULF COAST, INC.
Through its registered agent
CAPITOL CORPORATE SERVICES, INC.
8550 United Plaza Building II, Ste. 305
Baton Rouge, LA 70809

WHEREFORE, Qui Tam Plaintiff, J. R., respectfully prays that Defendants herein be served with a copy of qui tam complaint, disclosure statement, and all written disclosure of substantially all material evidence and information submitted therewith and that they be duly cited to appear and answer same, and after due proceedings be had, there be judgment in favor of Qui Tam Plaintiff, J.R., and against defendants, PLANNED PARENTHOOD GULF COAST, INC. AND ITS CERTAIN UNIDENTIFIED EMPLOYEES, for all amounts and relief prayed for in said Petition which are reasonable under the premises and for all costs of these proceedings.

FURTHER, Qui Tam Plaintiff, J.R. prays for all other general and equitable relief as may be appropriate in the premises.

Respectfully submitted:



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