

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re MULTIPLAN HEALTH INSURANCE
PROVIDER LITIGATION

This Document Relates To:
LEE HEALTH SYSTEM, INC., d/b/a Lee Health

Plaintiff,

v.

MULTIPLAN, INC. and MULTIPLAN CORP.,
VIANT, INC.

Defendants

Case No. 1:24-cv-06795 MDL No.
3121

Hon. Matthew F. Kennelly

DIRECT FILED COMPLAINT
PURSUANT TO MDL ORDER
NO. 6

DIRECT ACTION PLAINTIFF SHORT-FORM COMPLAINT

The Plaintiff named below files this Short-Form Complaint and (if checked off below) Demand for Jury Trial against the Defendant(s) named below by and through the undersigned counsel. Plaintiff incorporates by reference the factual allegations, as well as the claims and relief checked off below, sought in Plaintiffs' Consolidated Master Direct Action Plaintiff Complaint ("Consolidated Master DAP Complaint") as it relates to the named Defendant(s) (checked-off below), filed in *In re Multiplan Health Insurance Provider Litigation*, MDL No. 3121, in the United States District Court for the Northern District of Illinois. Plaintiff files this Short-Form Complaint pursuant to Case Management Order No. 6, filed on the MDL Docket (No. 1:24-cv-06795) at ECF 179.

Plaintiff indicates by checking the relevant boxes below the Parties, Designated Forum, Jurisdiction and Venue, Causes of Actions and other Relevant Information specific to Plaintiff's case. Plaintiff, by and through the undersigned counsel, alleges as follows:

I. IDENTIFICATION OF PARTIES**A. PLAINTIFF**

1. Name of the Plaintiff alleging claims against Defendant(s):

LEE HEALTH SYSTEM, INC., d/b/a Lee Health, as successor to Lee Memorial Health System

2. For each Plaintiff that is a corporation, list the state of incorporation and state of principal place of business. For each Plaintiff that is an LLC or partnership, list the state citizenship of each of its members. For each Plaintiff that is a natural person, list the state of residency and citizenship at the time of the filing of this Short-Form Complaint [Indicate State[s]]:

Florida

B. DEFENDANT(S)

3. Plaintiff names the following Defendant(s)¹ in this action [*Check all that apply*]:

☒	MultiPlan, Inc.
☒	Aetna, Inc., a subsidiary of CVS Health Corporation
☐	Blue Shield of California Life & Health Insurance Company
☐	Blue Cross Blue Shield of Michigan Mutual Insurance Company
☐	Aware Integrated, Inc. and BCBSM, Inc. d/b/a Blue Cross Blue Shield Of Minnesota
☐	Cambia Health Solutions, Inc. f/k/a The Regence Group
☐	Centene Corporation
☒	The Cigna Group
☒	Elevance Health, Inc. f/k/a Anthem, Inc.
☐	Health Care Service Corporation
☒	Highmark Health

¹ Each Defendant named in this Short-Form Complaint acted directly or through each of that entity's executives, employees, directors, and majority-owned subsidiaries. For example, UnitedHealth Group Inc. acted directly or through, among others, the following majority-owned subsidiaries: United Healthcare Insurance Company, and its affiliates; United Healthcare Services Inc.; United Healthcare Service LLC; Oxford Benefit Management, Inc.; UMR, Inc.; Sierra Health and Life Insurance Company, Inc.; Sierra Health-Care Options, Inc.; Health Plan of Nevada, Inc.; and United Healthcare of Florida, Inc.

☐	Horizon Healthcare Services, Inc. d/b/a Horizon Blue Cross Blue Shield of New Jersey
☒	Humana Inc.
☐	Kaiser Foundation Health Plan, Inc.
☐	Molina Healthcare, Inc.
☒	UnitedHealth Group Inc.
☐	Allied National, LLC
☐	Benefit Plans Administrators of Eau Claire, LLC
☐	Central States Southeast and Southwest Areas Health and Welfare Fund
☐	Consociate, Inc. d/b/a Consociate Health
☐	Healthcare Highways Health Plan (ASO), LLC
☐	Secure Health Plans Of Georgia, LLC D/B/A Secure Health
☐	Sanford Health Plan
☐	CareFirst Of Maryland
☐	Blue Cross Blue Shield of Massachusetts

C. OTHER DEFENDANTS

For each “Other Defendant” Plaintiff contends are additional parties and are liable or responsible for Plaintiff’s damages alleged herein, Plaintiff must identify by name each Defendant and its citizenship, and Plaintiff must plead the specific facts supporting any claim against each “Other Defendant” in a manner complying with the requirements of the Federal Rules of Civil Procedure. In doing so, Plaintiff may attach additional pages to this Short-Form Complaint.

	NAME	CITIZENSHIP
1		
2		
3		
4		

II. DESIGNATED FORUM

4. For Direct Filed Cases: Identify the Federal District Court in which the Plaintiff would have filed in the absence of direct filing: Middle District of Florida

5. For Transferred Cases: Identify the Federal District Court in which the Plaintiff originally filed and the date of filing: _____

III. **JURISDICTION AND VENUE**

6. Subject Matter Jurisdiction is based on:

X	Diversity of Citizenship
X	Federal Question
X	Other (The basis of any additional grounds for jurisdiction must be pled in sufficient detail as required by the applicable Federal Rules of Civil Procedure): Supplemental Jurisdiction (28 U.S.C. § 1367)

IV. **FACTS AND INJURIES ASSERTED**

7. Plaintiff adopts all paragraphs of the Consolidated Master DAP Complaint by reference, except for the allegations set forth in any cause of action that Plaintiff does not adopt (as indicated below).
8. Plaintiff adopts and alleges as injuries resulting from the challenged conduct the injuries to DAPs set forth in the Consolidated Master DAP Complaint.

V. **ADDITIONAL FACTS DEMONSTRATING STANDING TO BRING CAUSES OF ACTION**

9. Plaintiff alleges the following additional facts in support of its standing to bring causes of action:

Plaintiff Lee Health System, Inc. ("Lee Health") is a private non-profit health system organized under the laws of the State of Florida with its principal place of business in Fort Myers, Florida. Lee Health is successor to Lee Memorial Health System, by virtue of a conveyance transaction effective November 1, 2024. During the time period of this matter, Lee Memorial Health System was one of the largest public health systems in the State of Florida and provided hospital, emergency, surgical, and specialty medical services to residents and visitors throughout Southwest Florida. Lee Health currently owns and operates the multiple former Lee Memorial Health System acute care hospitals and healthcare facilities, including Lee Memorial Hospital, Cape Coral Hospital, Gulf

Coast Medical Center, and HealthPark Medical Center, as well as numerous outpatient and specialty care facilities. Lee Health currently (and Lee Memorial Health System previously) provides medically necessary healthcare services to patients who are insured by, or whose health benefit plans are administered by, the Defendant insurers and payors identified in this Complaint. In the ordinary course of its business, Lee Health and (Lee Memorial Health System previously) submits claims for reimbursement to the Defendant insurers and third-party administrators for medical services rendered to patients covered by health plans that utilize MultiPlan's preferred provider organization ("PPO"), network leasing, repricing, or related cost-containment services.

Defendant MultiPlan, Inc. and its affiliated entities contract with insurers, third-party administrators, and other payors to facilitate the repricing of out-of-network healthcare claims. Through these arrangements, MultiPlan applies pricing algorithms, benchmark methodologies, and coordinated reimbursement policies designed to reduce payments to healthcare providers below the amounts that would otherwise be paid in a competitive market. As a result of the agreements, information exchanges, and coordinated conduct alleged in the Consolidated Master Direct Action Plaintiff Complaint, Defendants have systematically repriced and reduced reimbursement owed to Lee Health for medically necessary services provided to insured patients.

This conduct has caused Lee Health to receive reimbursement substantially below the reasonable value of the healthcare services it provided and below the levels that would have prevailed in a competitive marketplace absent Defendants' unlawful agreements and anticompetitive conduct.

Lee Health has therefore suffered direct economic injury, including reduced reimbursements, lost revenue, and other damages resulting from Defendants' anticompetitive repricing practices. These injuries constitute antitrust injury and were proximately caused by Defendants' unlawful conduct as alleged in the Consolidated Master Direct Action Plaintiff Complaint.

VI. CAUSES OF ACTION ASSERTED

10. Plaintiff adopts and asserts the following Causes of Action alleged in the Consolidated Master DAP Complaint, and the allegations with regard thereto, against the Defendants identified above (*check all that are adopted*).

Check all that apply	Count	Cause of Action	Law pursuant to which the cause of action is asserted in the Master Complaint
X	I	Horizontal Agreements in Restraint of Trade (Section 1 of the Sherman Act, 15 U.S.C. § 1)	Federal Law
X	II	Hub-And-Spoke Agreement in Restraint of Trade (Section 1 of the Sherman Act, 15 U.S.C. § 1)	Federal Law
X	III	Principal-Agent Combinations in Restraint of Trade (Section 1 of the Sherman Act, 15 U.S.C. § 1)	Federal Law
X	IV	Agreements to Unreasonably Restrain Trade (Section 1 of the Sherman Act, 15 U.S.C. § 1)	Federal Law

X	V	Anticompetitive Information Exchange (Section 1 of the Sherman Act, 15 U.S.C. § 1)	Federal Law
X	VI	Violation of State and D.C. Antitrust Statutes	Florida Law
X	VII	Violation of State Consumer Protection Laws	Florida Law
X	VIII	Unjust Enrichment	Florida Law

NOTE

If Plaintiff wants to allege additional Causes of Action other than those selected in the preceding paragraph, which are the Causes of Action set forth in the Master Complaint, the facts supporting those additional Causes of Action, must be pled in a manner complying with the requirements of the Federal Rules of Civil Procedure. In doing so, Plaintiff may attach additional pages to this Short-Form Complaint.

VII. ADDITIONAL CAUSES OF ACTION

11. Plaintiff asserts the following additional Causes of Action and supporting allegations against the following Defendants:

Cause of Action	Governing Law
Monopolization (Section 2 of the Sherman Act, 15 U.S.C. § 2)	Federal Law
Conspiracy to Monopolize (Section 2 of the Sherman Act, 15 U.S.C. § 2)	Federal Law

These additional causes of action are attached to this Short Form Complaint as **Appendix A**.

VIII. PRAYER FOR RELIEF

12. *Check all that apply:*

X	WHEREFORE , Plaintiff prays for all available compensatory damages, treble damages, punitive damages in amounts to be proven at trial, and judgment against Defendant(s) and all such further relief that this Court deems equitable and just as set forth in the Master Complaint, and any additional relief to which Plaintiff may be entitled, including disgorgement.
X	WHEREFORE , Plaintiff prays for declaratory and injunctive relief and judgment against Defendant(s) and all such further relief that this Court deems equitable and just as set forth in the Master Complaint, and any additional relief to which Plaintiff may be entitled.

JURY DEMAND

[Check the applicable box]:

X	Plaintiff hereby demands a trial by jury as to all claims in this action.
	Plaintiff does not demand a trial by jury as to all claims in this action.

By signature below, Plaintiff's counsel hereby confirms their submission to the authority and jurisdiction of the United States District Court of the Northern District of Illinois and oversight of counsel's duties under Federal Rule of Civil Procedure 11, including enforcement as necessary through sanctions and/or revocation of pro hac vice status.

Date: June 24, 2026

Respectfully Submitted,

HARTLEY LAW OFFICES, PLC

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CERTIFICATE OF SERVICE

The undersigned attorney certifies that on June 24, 2026, we electronically filed a copy of the attached via the CM/ECF filing system, which sent notification of such filing to all Filing Users.

Date: June 24, 2026

By: /s/ Curtis B. Miner
Curtis B. Miner, Esq.