



IN THE CIRCUIT COURT OF MOBILE COUNTY, ALABAMA

STATE OF ALABAMA,

*

Plaintiff,

*

*

v.

CV-2025-901925

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**SOUTH ALABAMA MEDICAL &
REHAB LLC, et al.**

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AMENDMENT TO THE COMPLAINT

COMES NOW, the State of Alabama, by and through the undersigned Assistant District Attorney for the Thirteenth Judicial Circuit (Mobile County), pursuant to Rule 9(h) of the Alabama Rules of Civil Procedure, now substitutes the following real parties for the fictitious defendants in its Complaint (Doc. 2) and hereby substitutes by amendment as follows:

1. Substituted for “Fictitious Party B” is Media Placement Services, Inc., (“MPS”), a Wyoming corporation, with its principal place of business at 1919 Veterans Memorial Blvd, Ste 300, Kenner, Louisiana 70062. At all times relevant, this Defendant did and continues to work in active concert, participation and/or in partnership with the Runner Defendants and/or the Clinic Defendants to obtain accident victim contact information and/or solicit accident victims either for its own

benefit and/or for the benefit of Attorney Defendants and/or the Clinic Defendants and otherwise engaged in acts of deception and/or committed violations of the Alabama Deceptive Trade Practices Act against Alabama consumers.

2. Substituted for “Fictitious Party C” is Douglas Friedman (“Freidman”) is a resident of Louisiana, and whose address is 214 Douglas Dr, New Orleans, Louisiana 70123. At all times relevant, this Defendant did and continues to work in active concert, participation and/or in partnership with the Runner Defendants and/or the Clinic Defendants to obtain accident victim contact information and/or solicit accident victims either for his own benefit and/or for the benefit of Attorney Defendants and/or the Clinic Defendants and otherwise engaged in acts of deception and/or committed violations.
3. Substituted for “Fictitious Party D” is Brian Culliney (“Culliney”), is a resident of Kentucky, and whose address is 2624 Phoenix Hill Dr, Louisville, Kentucky 40207-1261. At all times relevant, this Defendant did and continues to work in active concert, participation and/or in partnership with the Runner Defendants and/or the Clinic Defendants to obtain accident victim contact information and/or solicit accident victims either for his own benefit and/or for the benefit of Attorney Defendants and/or the Clinic Defendants and otherwise engaged in acts of deception and/or committed violations.
4. Substituted for “Fictitious Party E” is Nicolas Probosz (“Probosz”), a resident of Florida and whose address is 1450 Pine Warbler Place, Unit 2403, Sarasota, Florida 34240-1559. At all times relevant, this Defendant did and continues to work in

active concert, participation and/or in partnership with the Runner Defendants and/or the Clinic Defendants to obtain accident victim contact information and/or solicit accident victims either for his own benefit and/or for the benefit of Attorney Defendants and/or the Clinic Defendants and otherwise engaged in acts of deception and/or committed violations.

5. Substituted for “Fictitious Party H” is Skyrise Management, LLC is a Wyoming Corporation with its principal place of business at 1919 Veterans Memorial Blvd, Kenner, Louisiana 70062. At all times relevant this Defendant did and continues to work in active concert, participation and/or in partnership with and/or as agents and/or employees of the Clinic Defendants and/or independently engaged in acts of deception and/or constituting violations of the Alabama Deceptive Trade Practices Act against Alabama consumers.
6. Substituted for “Fictitious Party I” is Chiropractic Strategies Group, Inc. (“CSG”) is a Texas corporation, with its principal place of business at 1919 Veterans Memorial Blvd, Ste 200, Kenner, Louisiana 70062. At all times relevant this Defendant did and continues to work in active concert, participation and/or in partnership with and/or as agents and/or employees of the Clinic Defendants and/or independently engaged in acts of deception and/or constituting violations of the Alabama Deceptive Trade Practices Act against Alabama consumers.
7. Substituted for “Fictitious Party J” is WEGOTYOURBACKUP LLC (“WGYBU”), an Indiana corporation with its principal place of business at 114 N Routiers Ave,

Indianapolis, Indiana 46219. At all times relevant this Defendant did and continues to work in active concert, participation and/or in partnership with and/or as agents and/or employees of the Clinic Defendants and/or independently engaged in acts of deception and/or constituting violations of the Alabama Deceptive Trade Practices Act against Alabama consumers.

8. Substituted for “Fictitious Party K” is KDS, LLC (“KDS”) an Indiana corporation with its principal place of business at 114 N Routiers Ave, Indianapolis, Indiana 46219. At all times relevant this Defendant did and continues to work in active concert, participation and/or in partnership with and/or as agents and/or employees of the Clinic Defendants and/or independently engaged in acts of deception and/or constituting violations of the Alabama Deceptive Trade Practices Act against Alabama consumers.
9. Substituted for “Fictitious Party L” is 448 Holdings, LLC (“448”) a Wyoming Corporation with its principal place of business at 1919 Veterans Memorial Blvd, Kenner, Louisiana 70062. At all times relevant this Defendant did and continues to work in active concert, participation and/or in partnership with and/or as agents and/or employees of the Clinic Defendants and/or independently engaged in acts of deception and/or constituting violations of the Alabama Deceptive Trade Practices Act against Alabama consumers.
10. Substituted for “Fictitious Party M” is Vacek Holdings, LLC (“Vacek Holdings”) is a Florida company and whose principal place of business is 6009 Courtside Dr, Bradenton, Florida 34210-4018. At all times relevant this Defendant did and

continues to work in active concert, participation and/or in partnership with and/or as agents and/or employees of the Clinic Defendants and/or independently engaged in acts of deception and/or constituting violations of the Alabama Deceptive Trade Practices Act against Alabama consumers.

11. Substituted for “Fictitious Party U” is Sterling Sheild Legal, LLC (“SSL”) is an Arizona corporation and law firm, who registered to do business in the State of Alabama June 24, 2024 and withdrew on October 8, 2025, and whose principal place of business is whose address is 2400 W Dunlap Ave, Ste 110, Phoenix, AZ 85012. At all times relevant, this Defendant did and continues to work in active concert, participation and/or partnership with and/or as agents and/or employees of the Clinic Defendants and engaged in acts of deception and/or for whom attorney representation agreements were tendered by the Defendants and knowingly accepted the benefit of the Defendants unlawful acts and/or engaged in acts of deception and/or committed violations of the Alabama Deceptive Trade Practices Act against Alabama consumers.

12. Substituted for “Fictitious Party AA” is Williem Vacek whose address is 6009 Courtside Dr, Bradenton, Florida 34210-4018. At all times relevant, this Defendant did and continues to work in active concert, participation and/or partnership with and/or as agent and/or master, and/or employee and/or employer and/or confederate of the Defendants, including but not limited to the Clinic Defendants and Attorney Defendants with whom upon knowledge and belief it shares certain ownership, and

otherwise engaged in acts of deception and/or committed violations of the Alabama Deceptive Trade Practices Act against Alabama consumers.

13. Substituted for “Fictitious Party BB” is Huntsville Medical & Rehab LLC (“HMR”) is an Alabama corporation with its principal place of business at 150 W Park Loop NW, Suite 360, Huntsville, Alabama 35806. At all times relevant, this Defendant did and continues to work in active concert, participation and/or partnership with and/or as agent and/or confederate of the Defendants, including but not limited to the Clinic Defendants, with whom upon knowledge and belief it shares ownership, and otherwise engaged in acts of deception and/or committed violations of the Alabama Deceptive Trade Practices Act against Alabama consumers.

14. Substituted for “Fictitious Party CC” is Homewood Medical, LLC (“Homewood”) is an Alabama corporation with its principal place of business at 601 Beacon Pkwy W Ste 212, Birmingham, Alabama 35806. At all times relevant, this Defendant did and continues to work in active concert, participation and/or partnership with and/or as agents and/or confederates of the Defendants, including but not limited to the Clinic Defendants, with whom upon knowledge and belief it shares ownership, and otherwise engaged in acts of deception and/or committed violations of the Alabama Deceptive Trade Practices Act against Alabama consumers.

15. Substituted for “Fictitious Party DD” is Montgomery Medical & Rehab LLC (“MMR”) is an Alabama corporation with its principal place of business at 100 Interstate Park Dr Ste 104, Montgomery, Alabama 36109. At all times relevant, this Defendant did and continues to work in active concert, participation and/or

partnership with and/or as agents and/or confederates of the Defendants, including but not limited to the Clinic Defendants, with whom upon knowledge and belief it shares ownership, and otherwise engaged in acts of deception and/or committed violations of the Alabama Deceptive Trade Practices Act against Alabama consumers.

16. The State will serve these defendants with the Summons and Complaint in accordance with the Alabama Rules of Civil Procedure.

Respectfully submitted this 17th day of July, 2026

Respectfully submitted,

/s/ Clay T. Rossi

Clay T. Rossi (ROS045)

Peter F. Burns (BUR054)

Louis C. Walker IV (WAL207)

Assistant District Attorneys

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CERTIFICATE OF SERVICE

I hereby certify that on the 17th day of July, 2026, electronically filed the foregoing with the Clerk of Court using the Alafile system, and that I hereby certify that I have mailed by placing a copy of same in the United States Mail, first-class postage prepaid and properly addressed, or sent via email, to those Alafile participants:

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/s/ Clay T. Rossi
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