



IN THE CIRCUIT COURT OF MOBILE COUNTY, ALABAMA

STATE OF ALABAMA,

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Plaintiff,

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*

v.

CV-2025-901925

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

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STATE OF ALABAMA’S SUPPLEMENT TO ITS PENDING DISCOVERY MOTIONS

COMES NOW the State of Alabama, by and through the undersigned Assistant District Attorney, and respectfully supplements its two pending discovery motions—its Motion for Sanctions, Appointment of Special Master Pursuant to Ala. R. Civ. P. 53 (Doc. 285), and Award of Attorneys’ Fees (the “SAMR Master Motion”), and its Motion to Compel Discovery Responses from Dolinsky Law Group, LLC, and for Appointment of Master Upon Failure to Comply (Doc. 295) (the “DLG Compel Motion”).

The State writes to bring to the Court’s attention newly received evidence that the Defendants are, in all likelihood, violating this Court’s Preliminary Injunction (Doc. 63) by perpetrating the very claim-jacking scheme the Court enjoined (currently operating it through a differently-named clinic in a different Alabama city) and that the Defendants are concealing the entities’ common identity and control by refusing to produce the discovery

that would prove it. The discovery the State has sought for nearly a year is the key to unmasking that concealment. In support, the State shows the Court as follows:

I. WHAT THE COURT ENJOINED

This Court's Preliminary Injunction was directed not merely at a single storefront but at a course of conduct, the claim-jacking scheme, and at "SAMR Clinic, and those working in concert with the clinic." (Doc. 63 at 3) The Order forbids the Clinic Defendants and "anyone acting on their behalf" from soliciting treatment and from referring patients to the Attorney Defendants; bars the Attorney Defendants from accepting clients solicited through any "case runner" associated with SAMR; and, in its broadest provision, enjoins the Runner Defendants "from making contact with accident victims in the State of Alabama." (Doc. 63 at 4–5)

The Court entered the Order "to prevent any further harm to the public and to prevent future violations" of the Deceptive Trade Practices Act. (Doc. 63 at 3) An injunction that could be evaded simply by re-papering the same scheme under a alter-ego name in a different city would serve none of those purposes.

II. THE SAME SCHEME, THE SAME PEOPLE, A NEW NAME AND CITY

Since the two pending motions were filed, the State has received sworn accounts from two Huntsville accident victims describing the enjoined scheme in operation, under the name "Huntsville Medical and Rehab" rather than "South Alabama Medical & Rehab."

A. Anna Marie Jacks (Ex. 1).

After a January 19, 2026, collision in Huntsville, Ms. Jacks was contacted by a person claiming to be an insurance advocate and directed to Huntsville Medical and Rehab. While she was at the clinic, an employee said he would obtain a lawyer for her, and a representation agreement with John C. Baker of Vacek Law Group was transmitted to her by DocuSign and executed while she remained at the clinic.

Approximately two and a half weeks into treatment, she met Chad Loveless at Huntsville Medical and Rehab. (HMR) A technician told her that Chad Loveless was “the boss.” Mr. Loveless asked her about the lawyer and matters related to her claim. Chad told her that he had retired from chiropractic work to do this practice.

During her interaction with the telemarketer and representatives of HMR she dealt with many people whose identities were not revealed to her.

B. Kathleen M. Rafey (Ex. 2).

After a February 27, 2026, collision, Ms. Rafey was cold-called on March 2, 2026, by a caller who did not identify himself but implied he was affiliated with the police. When she asked questions, the caller told her he was with a network of clinics and that she should go to Huntsville Medical and Rehab for a free examination. She then received a text appointment confirmation at Huntsville Medical and Rehab.

At the clinic, she met with Chad Loveless and an unidentified office manager. Loveless steered her to an attorney at Vacek Law Group. An unidentified person at HMR's front desk confirmed that it obtains accident victims' police reports and contact information through a "third-party service."

C. Collections South Alabama Medical (Ex. 3).

As demonstrated in the State's Motion to Appoint a Master, SAMR has relied on the Fifth Amendment privilege of its employees to avoid identifying them, their job duties, and their knowledge of the company's operational details.

Even so, as demonstrated by the attached Exhibit 3, as of May 20, 2026, SAMR was actively pursuing collection of at least one debt allegedly due it for medical services it purports to have provided. There is no individual's name associated with that collection effort by SAMR.

III. A SINGLE ENTERPRISE OPERATING INTERCHANGEABLE SHELL CLINICS ACROSS ALABAMA

Loveless and the Vacek Law Group are Defendants in this case. According to the affidavits, they are continuing to engage in claim-jacking and are likely doing so in cooperation with other defendants in this case. Without the long-overdue discovery, the State is unable, at this point, to prove the involvement of other defendants in this case. However, the method is identical to the scheme this Court enjoined.

Three points support the conclusion that “SAMR” is one interchangeable shell in a single enterprise that operates the same claim-jacking scheme through similarly-named clinic entities in different Alabama cities.

First, the naming pattern.

The State’s own discovery has long targeted a set of clinics sharing an unmistakable naming convention: South Alabama Medical & Rehab, Montgomery Medical & Rehab LLC, Huntsville Medical & Rehab LLC, and Homewood Medical LLC. (See Doc. 296, pp. 74-75, DLG RFP No. 2.) Huntsville Medical and Rehab—where Ms. Jacks and Ms. Rafey were taken—fits that pattern exactly.

Second, the shared personnel and pipeline.

The Huntsville clinic receives “patients” through telemarketers, is staffed by Loveless, and feeds cases to VLG. And as the pending motions show (Ex. A to each), Judge Hambright heard sworn testimony only weeks ago that the victim there was introduced to a preselected law group by “*Stephanie Wilson from South Alabama Medical & Rehab,*” who “*presented that contract to*” her “[*a*]*t South Alabama Medical & Rehab in Stephanie’s office,*” after which the victim “*never ever spoke to an attorney*” and the court awarded “*zero attorneys’ fees.*” *Mohave Transp. Ins. Co. v. Dean Waite & Assocs., LLC & Dolinsky Law Grp., LLC*, No. CV-2025-902799, Tr. of Mar. 11, 2026 Hr’g at 6–7, 28.

Third, SAMR behaves as a shell.

In its sworn-to-objections-only responses, SAMR claims not to know its own operations—who drafted its own Medical Provider Lien form, its own patient protocols, the details of its own office manager’s employment, and the reason for its own payments to Skyrise Management, KDS LLC, Media Placement Services, and other named entities. An operating clinic knows these things; a shell used to obscure who controls it does not. Those undisclosed payees are the lead-generation and runner apparatus through which victims like Ms. Jacks and Ms. Rafey are identified and cold-called statewide.

Fourth—and decisively—the Defendants are hiding the connection by refusing discovery.

The State cannot place the common ownership and control of these clinics before the Court because the Defendants have withheld the very records that would establish it. That concealment allows it to continue defrauding insurance companies and victimizing injured Alabama citizens. The State should not be required to prove the corporate links of a shell network from the outside while the Defendants refuse to open the books that would prove them from within.

IV. CONCLUSION

The Defendants appear to be doing precisely what this Court forbade—running the claim-jacking scheme under a new shell name in a new city—and they are shielding that conduct by refusing the discovery that would expose the network behind it. The purpose

of the injunction to prevent “future violations” cannot be served while the Defendants rename and relocate faster than the State can identify them.

WHEREFORE, in further support of its two pending motions, the State respectfully requests that this Court:

- GRANT the SAMR Master Motion and appoint a Special Master pursuant to Ala. R. Civ. P. 53 as requested therein, with authority to trace the ownership, control, and payments linking SAMR to its affiliated clinics;
- GRANT the DLG Compel Motion, ordering full and verified responses within seven (7) days—including the affiliated-clinic representation agreements sought by RFP No. 2—with automatic appointment of a Master upon non-compliance as requested therein; and
- GRANT such other and further relief as the Court deems just and proper, including expedited consideration in light of the ongoing harm described above.

Respectfully submitted,

/s/ Peter “Pete” F. Burns
Peter F. Burns (BUR054)
Clay T. Rossi (ROS045)
Louis C. Walker IV (WAL207)
Assistant District Attorneys

Mobile County District Attorney’s Office
Mobile Government Plaza
205 Government Street, Suite C-701
Mobile, AL 36644-2501

CERTIFICATE OF SERVICE

I hereby certify that on the 25th day of June, 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:

Jacob A. Fuller, Esq.
J. Fuller Law, LLC
1706 Dauphin Street
Mobile, Alabama 36604
jacob@fullerlaw.us
Attorney for Defendant
Stephanie Wilson

Cole R. Gresham, Esq.
STARNES DAVIS FLORIE LLP
100 Brookwood Place, Seventh Floor
Birmingham, Alabama 35209
cgresham@starneslaw.com
Attorney for Defendants
South Alabama Medical & Rehab LLC
Chad Loveless
Stephanie Wilson
Bryan Walters
Michael Kent Plambeck

Frederick G. Helmsing, Jr., Esq.
JONES WALKER, LLP
11 North Water St., Ste. 1200
Mobile, Alabama 36602
fhelmsing@joneswalker.com
Attorney for Defendants
Dolinsky Law Group LLC
Robert Dolinsky
Tiffany Tolliver

Hube Dodd
The Dodd Law Firm
600 University Park Place, Suite 100
Birmingham, Alabama 35209
hube@hdoddllaw.com
Attorney for Defendants
Vacek Law Group PLLC
John C. Baker
Hube Dodd

/s/ Clay T. Rossi
Assistant District Attorney