

No. 21-20311

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**In the United States Court of Appeals for the Fifth Circuit**

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JENNIFER BRIDGES; BOB NEVENS; MARIA TREVINO;  
RICARDO ZELANTE; LATRICIA BLANK; ET AL,

*Plaintiffs-Appellants,*

v.

THE HOUSTON METHODIST HOSPITAL,  
DOING BUSINESS AS THE METHODIST HOSPITAL SYSTEM;  
HOUSTON METHODIST THE WOODLANDS HOSPITAL,

*Defendants-Appellees.*

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On Appeal from United States District Court  
for the Southern District of Texas  
No. 4:21-CV-1774

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**AGREED MOTION TO CORRECT  
COURT'S OFFICIAL CAPTION**

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**CERTIFICATE OF INTERESTED PERSONS**

No. 21-20311

JENNIFER BRIDGES; BOB NEVENS; MARIA TREVINO;  
RICARDO ZELANTE; LATRICIA BLANK; ET AL,

*Plaintiffs-Appellants,*

v.

THE HOUSTON METHODIST HOSPITAL,  
DOING BUSINESS AS THE METHODIST HOSPITAL SYSTEM;  
HOUSTON METHODIST THE WOODLANDS HOSPITAL,

*Defendants-Appellees.*

The undersigned counsel of record certifies that the following listed persons and entities as described in the fourth sentence of Rule 28.2.1 have an interest in the outcome of this case. These representations are made in order that the judges of this court may evaluate their possible recusal or disqualification:

1. No publicly held company owns 10% or more of the stock of Defendant-Appellee The Houston Methodist Hospital, doing business as The Methodist Hospital System.
2. No publicly held company owns 10% or more of the stock of Defendant-Appellee Houston Methodist The Woodlands Hospital.

3. Defendants-Appellees The Houston Methodist Hospital, doing business as The Methodist Hospital System, and Houston Methodist The Woodlands Hospital are represented in the Fifth Circuit by:

Constance H. Pfeiffer  
Grant B. Martinez  
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Additional counsel who represented the Defendants-Appellees, The Houston Methodist Hospital, doing business as The Methodist Hospital System, and Houston Methodist The Woodlands Hospital in the district-court proceedings are:

Daniel F. Patton  
Andrew Paul Barber  
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4. Plaintiffs-Appellants Rose Aldaya, Sandra Altamirano, Judith Andriko, Alison Antu, Mary Apacway, Dajuana Armstrong, Amber Baker, Edna Barrera, Debra Baugh, Latricia Blank, Amanda Blanton, James Borje, Laura Bowden, Jennifer Bridges, John Brockus, Katherine Brol, Arlin Cameron, Pierre Charland, Brian Clegg, Celina Clvir, Sherry Colbert, Joann Crump Creamer, Zoretta Curry, Lorri Curto, Julie De Torre, Madeline Dib, Sierra Dockray, Stephanie Dunlap, Ana

Escobar, Brenda Escobar, Teryn Essler, Monica Estrella, Brian Felgere, Rebekah Fontenot, Michelle Fuentes, Adriana Galvan, Darius Gardner, Ashton Hanley, Samantha Hanlon, Tara Hansen, Savannah Hanson, Stacy Hanzelka, Starla Haugenator, Ashley Heinrich, Santana Henderson-Jones, Paul Herin, Shauna Herin, Jade Hernandez, Luz Hernandez, Stephanie Hilton, Jeffrey Hinton, Sharon Hollier, Joseph Hoyt, Walter Infantes, Shaylonda Jackson, Dana Janoch, Jason Jimenez, Amber Kimich, Carmen LaTorre, Gilberto Lara, Priscilla Lara, John Lasseigne, Angela Lavespere, Tatyana Lazarenko, Ashley Leon, Brooke Lighthall, Tammy Linkenhoker, Alexis Lopez, Bennie Lopez, Brandy Mann, James McCann, II, Generia McGraw, Elsa Mejia, Rogelio Mendez, Kim Mikeska, Norma Miller, Yolunda Milton, Ahmed Montgomery, Robert Morin, Cherri Mosley, Bob Nevens, Linda Pickard, Sara Pika, Christina Pineros, McKenli Pinkney, Theresa Porche, Jonae Powell, Cynthia Puente, Averi Reed, Kimberly Rensi, Pamela Robins, Janet Robison, Saul Rodriguez, Timothy Rosilez, Betty Samuel, Giovanni Savans, Leevetgra Seals, Maria Serrano, Kara Sheperd, James Smiley, Nicole Smith, Freenea Stewart, Cynthia Strauss, Katherine Sweitzer, Karene Tanner, Maria Trevino, Terah Trevino, Charles Vargnese, Randi Vincent, Mathea Volesky, Hunter Ward, Jennifer Warren, Victoria Webb, Alexandra Williams, Mona Wilson,

Karen Witt, Latasha Woods, Laurica Wooten, Katie Yarber, Oscar Zamudio, and Ricardo Zelante are represented in the Fifth Circuit by:

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/s/ Constance H. Pfeiffer

Constance H. Pfeiffer

*Attorney of record for Appellees*

*The Houston Methodist Hospital, d/b/a*

*The Methodist Hospital System; Houston*

*Methodist The Woodlands Hospital*

### **GROUND AND RELIEF SOUGHT**

1. The Court's Official Caption uses inaccurate names for the two Defendants-Appellees in this appeal, presumably because the names were incorrectly docketed in the district court. The error in the names was not discovered until the case was already docketed in this Court.

2. The parties agree that the Court's Official Caption should be corrected to use the correct legal and business names for Defendants-Appellees.

3. Those correct legal names are: (1) The Methodist Hospital d/b/a Houston Methodist, and (2) Methodist Health Centers d/b/a Houston Methodist The Woodlands Hospital.

4. After conferring with the Clerk's Office and Opposing Counsel, Appellees timely filed their brief using correct names and have been afforded 14 days, until February 11, 2022, to file a sufficient brief. If this motion is granted, the already filed brief will be sufficient.

5. In the event of a remand, or if it becomes otherwise necessary, Appellees will also move to correct the names of Defendants-Appellees in the district court.

**CONCLUSION**

Appellees respectfully pray that the Court correct the Court's Official Caption in this case.

Dated: January 31, 2022

Respectfully submitted,

*/s/ Constance H. Pfeiffer*

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*Houston Methodist The Woodlands Hospital*

**CERTIFICATE OF SERVICE**

I certify that this document was filed with the Court via the court's electronic filing system, on the 31st day of January, 2022, and an electronic copy of the document was served on all counsel of record, as listed below, via the court's electronic filing system on the same date:

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/s/ Constance H. Pfeiffer

Constance H. Pfeiffer



**CERTIFICATE OF CONFERENCE**

I certify that on January 28, 2022, I conferred via email with Jared Woodfill and Jillian L. Schumacher, counsel for appellants, who indicated that appellants agree to the relief requested.

/s/ Constance H. Pfeiffer  
Constance H. Pfeiffer

### CERTIFICATE OF COMPLIANCE

1. This document complies with the type-volume limitations of Federal Rule of Appellate Procedure 27(d)(2) because this document contains 180 words, excluding the parts of the document exempted by Federal Rule of Appellate Procedure 27.

2. This document complies with the typeface and type-style requirements of Federal Rules of Appellate Procedure 32(a)(5) and (a)(6) because this document has been prepared in a proportionally spaced typeface.

Date: January 31, 2022

/s/ Constance H. Pfeiffer  
Constance H. Pfeiffer