STATE OF MICHIGAN
COURT OF CLAIMS

MOBILE MEDICAL RESPONSE, INC.,

Plaintiff,

v

MICHIGAN DEPARTMENT OF TECHNOLOGY, MANAGEMENT & BUDGET and MICHIGAN DEPARTMENT OF CORRECTIONS,

Defendants.

No. 25-000042-MZ

HON. RANDY J. WALLACE

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STIPULATED ORDER TO STAY CASE UNTIL FRIDAY, NOVEMBER 13, 2026

At a session of said Court held in the City of Lansing,
County of Ingham, State of Michigan,
This 24 day of August, 2026.

PRESENT: Hon. Randy J. Wallace
The Honorable Randy J. Wallace

The parties, through their respective counsel, hereby stipulate and agree as follows:

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1. Plaintiff filed the instant action on March 18, 2025, asserting claims of unjust enrichment and quantum meruit.

2. The basis of Plaintiff's claims pertain to a contract that existed between the State of Michigan and Grand Prairie Healthcare Services, PC and Wellpath, LLC (collectively "Wellpath"), which permitted Wellpath to subcontract ambulance related services to the Plaintiff and required Wellpath to pay for such services within 45 days of receipt of a claim.

3. Plaintiff's complaint asserts that it provided five hundred eighty-two (582) ambulance transports between July 2022 and April 2024, but Wellpath frequently failed to pay Plaintiff.

4. The State of Michigan allegedly assigned the Contract that it had with Wellpath to another entity effective February 10, 2024.

5. Wellpath allegedly filed a Chapter 11 bankruptcy on November 11, 2024.

6. Plaintiff asserts that prior to the State assigning the contract to another entity, Plaintiff was owed $770,159.59 for ambulance services that it had already provided; however, Wellpath failed to pay for the ambulance transports and related medical services.

7. Plaintiff filed a first amended complaint on March 28, 2025, and a second amended complaint on April 28, 2025.

8. The second amended complaint asserts the same claims as the initial complaint: unjust enrichment and quantum meruit.

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9. On May 16, 2025, Defendants filed a motion to dismiss in lieu of an answer to the complaint.

10. Defendants sought dismissal pursuant to MCR 2.116(C)(7) or (8).

11. Judge Yates held a hearing on March 6, 2026, regarding Defendants' motion for summary disposition, and after hearing arguments from both parties issued an order denying summary disposition under MCR 2.116(C)(7) without prejudice to filing a future motion and denying summary disposition under MCR 2.116(C)(8).

12. Following the issuance of Judge Yates' order, Defendants filed an answer to the complaint, and Judge Yates issued a scheduling order.

13. The scheduling order directed that discovery must be completed no later than October 23, 2026.

14. The parties are currently in discovery and recently filed a stipulated order extending the deadline for Defendants to respond to Plaintiffs' discovery requests to August 26, 2026, which this Court granted.

15. More recently, the parties became aware that the 2026-2027 appropriations bill passed by the Legislature and signed by the Governor includes a one-time appropriation for reimbursement payments to ambulance providers—identified as the "emergency services contracted providers fund."

16. Plaintiff may qualify to receive reimbursement payments from the emergency services contracted providers fund for the full amount of unpaid services identified in Plaintiff's complaint, which may resolve Plaintiff's claims.

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17. Accordingly, the parties agree that a stay of this action is appropriate to permit Plaintiff to submit an application for reimbursement payments and to permit the State of Michigan to review and issue reimbursement payments from the emergency services contracted providers fund.

ORDER

This matter having come before the Court on the parties' stipulation and the Court having been fully advised thereon;

IT IS HEREBY ORDERED that the parties agree and stipulate that this case, including all discovery response deadlines, is stayed until Friday, November 13, 2026.

IT IS FURTHER ORDERED that the parties will file a joint status report by Friday, November 13, 2026, providing this Court with an update on the status of Plaintiff's application for, or receipt of, reimbursement funds from the emergency services contracted providers fund.

THIS IS NOT A FINAL ORDER.

IT IS SO ORDERED

Date: August 24, 2026

Hon. Randy J. Wallace
Court of Claims Judge

We stipulate to entry of the above order.

/s/ Millicent E. Shek (w/ consent)
Millicent E. Shek (P78871)
Attorney for Plaintiff

/s/ Tyler R. Kitzmiller
Tyler R. Kitzmiller (P86684)
Attorney for Defendants

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Court of Claims
TUEBOR
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