April 6, 2023

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11487975

**Florida Pain Care**  
Dr. Dan Shaffer

2749 Citrus Tower Blvd,   
Clermont, FL 34711

RE: Our Client: Tracy Horton

DOB: 01/02/1967

DOA: 2/20/2021

**Patient’s Acknowledgement of Financial Responsibility**

This firm has been employed to represent Tracy Horton for personal injuries sustained on February 20, 2021. Your office has requested that we send you this Patient’s Acknowledgement of Financial Responsibility because you may have an outstanding balance regarding this unfortunate event caused by someone’s negligent conduct. Since all doctors and medical facilities routinely request such assurances, I have no problem complying with your reasonable request. I also want it to be clear that nothing in this letter constitutes a “special agreement”, or a “unique contract” between our offices in as much as this is a standard form letter that is provided to all medical providers who are willing to treat my clients for injuries that the totally careless insurance corporation is contesting.

On behalf of our client, thank you for being so flexible regarding the financial aspects of their medical treatment. Victims of negligence are almost always put in a financial bind and, naturally, they cannot expect cooperation from multi-billion dollar insurance corporations. If it were not for health care providers like you who are willing to wait for payment until a reasonable settlement or verdict can be forced out of the insurance corporation, then many legitimately injured people like Ms. Horton would not be able to receive proper medical treatment for their injuries.

The insurance adjuster may wish for our office to provide medical narratives or reports in the future for purposes of settling her clear liability claim. We will let you know if such a report is needed. In the meantime, kindly keep our office updated on the amount of Ms. Horton’s medical charges.

At the request of our client, we hereby advise that we will protect so much of your bill that is reasonable, customary and necessary. If the client recovers money damages from any person or entity responsible for injuries sustained by the client in the crash, Morgan & Morgan agrees to withhold sufficient funds from any check or draft in which Morgan & Morgan is an additional named payee, after deduction of attorney’s fees and costs, for reimbursement of all reasonable and medically necessary expenses as a result of the loss. This Patient’s Acknowledgement of Financial Responsibility does not guarantee payment of your entire bill, but rather ensures that your bill will be paid from any settlement with the completely careless party’s multi-billion dollar insurance corporation before any settlement funds are disbursed to your patient/our client. Please understand that payment of your balance is uncertain. This uncertainty is due in large part to the questionable opinions offered at trial by physicians hired by defense attorneys who are working for huge insurance corporations with unlimited resources and money to combat the totally reasonable claims brought by our injured client/your patients.

This Patient’s Acknowledgement of Financial Responsibility of your billing only applies to that portion of your bill that is not covered by the patient’s health insurance available to him, if any, for the loss of February 20, 2021. This is further conditioned upon you first submitting my client’s bills to applicable health insurance carriers, for payment if any, to reduce your outstanding balance.  Additionally, this is conditioned upon the cooperation of your office in seeing that we timely receive medical records, reports, and itemized bills upon request to assist us in dealing with the negligent party’s huge insurance company.  Finally, this Patient’s Acknowledgement of Financial Responsibility will become null and void if our client’s medical bills are sent to collections, if interest is charged upon the account, or if the account is sold to another vendor.

            Regardless of the outcome of this case, whether by settlement with the totally careless party’s multi-billion dollar insurance corporation or as a result of a jury verdict, my client is, and shall remain, solely liable for all medical services rendered to my client by your office. My client understands that their obligation for payment of your bill is not contingent on the outcome of the case. Nor is it contingent on testimony from you as the healthcare provider, and you and your office shall only be required to testify if subpoenaed to do so.  My client does not want nor expect you to provide any “favorable testimony” simply because there is a Patient’s Acknowledgement of Financial Responsibility in place, and asks only that should you be forced into court, at the cost of shutting your practice down for that time period, that your testimony only be truthful, fair, and balanced.  That would be unethical, illegal, and I know you would not resort to those tactics despite what others may outrageously allege in the defense of my client’s claim.  It is understood that my client alone, and not this firm, is personally responsible for all charges incurred with your office irrespective of the outcome of this case even though all these charges were due to the carelessness of another, and those personal obligations of my client will be paid out of my client’s insurance settlement, should there be sufficient settlement proceeds to make such payment.

            I appreciate your willingness to treat my client during this difficult time in my client’s life.  Not many healthcare professionals are willing to help others in need without payment up front. Many doctors have forgotten that the ability to help heal others is the primary reason for going to medical school.  Too many others doctors seem to just want money for doing little more than just talking.  This Patient’s Acknowledgement of Financial Responsibility will provide my client peace of mind (financially, medically and legally) at a time when my client needs it the most.  We will advise you as soon as his case is settled and/or tried to verdict. In the event we close our file for any reason without a settlement or verdict for the case, we will notify you in order that you may take whatever action is necessary.

Sincerely,

Nicholas Panagakis, Esq.  
NPP/ee/bnr