



David P. Billings (11510)
FABIAN VANCOTT
95 S. State Street, Suite 2300
Salt Lake City, Utah 84111
Phone: 801-531-8900
dbillings@fabianvancott.com
Attorneys for Plaintiff Balanced Management, LLC

**IN THE THIRD JUDICIAL DISTRICT COURT
IN AND FOR SALT LAKE COUNTY, STATE OF UTAH**

BALANCED MANAGEMENT, LLC, Plaintiff, v. FRONTIER HEALTHCARE, LLC; THOMAS HUTCHINSON; AND ROGER MORGAN, Defendants.	DEFAULT JUDGMENT Case No: 260901400 Judge: Thaddeus May Tier 3
--	--

1. The Summons and Petition to Confirm Arbitration Award were served on Defendants Frontier Healthcare, LLC, Thomas Hutchinson, and Roger Morgan (“Defendants”) as follows: Frontier Healthcare, LLC, via its registered agent, on March 10, 2026; Roger Morgan, via personal service, on March 10, 2026; and Thomas Hutchinson, via personal service, on March 11, 2026. Verified Proofs of Service were filed on March 16, 2026. (Dkt. Nos. 8, 9, and 10.)

2. Defendants’ time in which to file an Answer has passed, and Defendants have not answered or otherwise appeared.

3. The Clerk of the Court entered a Default Certificate against all Defendants on July 7, 2026. (Dkt. No. 16.)

4. The military status of defaulting Defendant Frontier Healthcare, LLC, under the Servicemembers Civil Relief Act, 50 U.S.C. § 3911, is not applicable, as it is a limited liability company, not a natural person. *See, e.g., CenturyLink v. Logic Tree LLC*, No. 14-CV-02747-REB-MJW, 2015 WL 430217, at *3 (D. Colo. Jan. 30, 2015) (“Defendant is a business entity (not a natural person), and therefore is not a minor, incompetent, or in the military service.”).

5. Under the Servicemembers Civil Relief Act, 50 U.S.C. § 3911, Plaintiff has certified that its counsel performed an adequate and reasonable search and determined that Defendants Thomas Hutchinson and Roger Morgan are not in military service. See Department of Defense Manpower Data Center status reports (Dkt. No. 13, Exs. B & C).

6. Therefore, Plaintiff Balanced Management, LLC, is entitled to the following relief, as prayed for in the Petition to Confirm Arbitration Award:

a. Defendants are ORDERED, jointly and severally, to pay Plaintiff one hundred thirty-eight thousand, nine hundred fifty-eight dollars and 42/100 (\$138,958.42) in damages pursuant to the Stipulated Consent Award (Petition Ex. 4 at ¶ 8);

b. Defendants are ORDERED, jointly and severally, to pay post-judgment interest on the foregoing amount at the rate of ten percent (10%) per annum, calculated from November 21, 2025, until paid in full (Petition Ex. 4 at ¶ 9);

c. Defendants are ORDERED, jointly and severally, to pay Plaintiff’s reasonable attorneys’ fees and costs incurred in enforcing the Loan Agreement, the Settlement Agreement, and the Consent Award, including, but not limited to, all attorneys’ fees accrued through the process of the Arbitration, all costs of the Arbitration, and all costs and fees associated with any efforts to register or confirm the Consent

Award (Petition Ex. 4 at ¶ 10), in an amount to be determined upon Plaintiff's submission of a supporting declaration;

d. This judgment may be supplemented and/or augmented by attorney fees, costs, and/or other amounts reasonably incurred in the collection of the judgment; and

e. The Court retains the authority to take measures to enforce this judgment in the event it is not timely paid.

-----**END OF ORDER**-----

**EFFECTIVE ON THE DATE AND TIME INDICATED BY THE COURT'S SIGNATURE
AND SEAL AT THE TOP OF THIS DOCUMENT**

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of July, 2026, I caused a true and correct copy of the foregoing proposed DEFAULT JUDGMENT to be filed electronically with the Court and served via certified mail to the following:

Frontier Healthcare, LLC
30 N. Gould Street, Suite R
Sheridan, WY 82801

Thomas Hutchinson
4 Hawks Ridge Court
Novato, CA 94949

Roger Morgan
22527 Petrizzi Lane
Katy, TX 77449

/s/ David P. Billings

4926-6670-0732, v. 2