NO. 15-26-00142-CV

IN THE FIFTEENTH COURT OF APPEALS

IN RE GILEAD SCIENCES, INC.,
Relator.

Original Proceeding from Cause No. 23-800
71st Judicial District Court, Harrison County, Texas

BRIEF OF AMICUS CURIAE WASHINGTON LEGAL FOUNDATION IN SUPPORT OF RELATOR

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INTEREST OF AMICUS CURIAE*

Washington Legal Foundation is a nonprofit, public-interest law firm and policy center with supporters nationwide, including many in Texas. WLF promotes free enterprise, individual rights, limited government, and the rule of law. It regularly advocates for these values in False Claims Act litigation. *See*, *e.g.*, *U.S. ex rel. Polansky v. Exec. Health Res., Inc.*, No. 21-1052 (U.S.); *Univ. Health Servs., Inc. v. U.S. ex rel. Escobar*, No. 15-7 (U.S.); *U.S. ex rel. Penelow v. Janssen Products, LP*, No. 25-1818 (3d Cir.); *U.S. ex rel. Zafirov*, No. 24-13581 (11th Cir.). And it filed an earlier amicus brief supporting mandamus in this case. *In re Gilead Sciences, Inc.*, No. 24-0281 (Tex.).

WLF's Legal Studies division—the foundation's publishing arm—often produces scholarly articles on qui tam litigation. *See, e.g.,* Alaap Shah & Stuart M. Gerson, *DOJ's Cyber Fraud Initiative: What Contractors Need to Know About Novel Use of False Claims Act*, WLF Working Paper (Jan. 28, 2022), https://perma.cc/H6Y4-BTBC; Kristin

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*No party's counsel authored any part of this brief. No one, apart from Washington Legal Foundation and its counsel, contributed money intended to fund the brief's preparation or submission. *See* Tex. R. App. P. 11.

Graham Koehler & Joshua Fougere, *Open Invitation to Challenge the Constitutionality of Qui Tam False Claims Act Cases* (Sep. 29, 2023), https://perma.cc/G6EA-63GK. WLF submits this brief to ensure that Texas's penal qui tam statute is confined to its terms—and not converted by serial relators into a settlement-extraction device aimed at lawful, federally endorsed business conduct.

INTRODUCTION

Health Choice Advocates is not a whistleblower. It is a shell company—one node in a network of affiliates formed to file copycat qui tam suits against pharmaceutical manufacturers nationwide. *See United States ex rel. Health Choice Alliance, L.L.C. v. Eli Lilly & Co.*, 4 F.4th 255, 259 (5th Cir. 2021) (describing eleven affiliate suits against thirty-eight defendants). The theory is always the same: that mere patient support—a nurse teaching a patient to safely self-inject part of a prescribed treatment regimen, a phone call to an insurer to learn whether it requires prior authorization for a prescribed medicine—is really a "kickback" to doctors because it might save a doctor's staff some time.

As shown below, that theory has failed everywhere it has been tested. The United States investigated it for years, found it meritless, and intervened to end it wherever it appeared. Federal courts of appeals have sustained those dismissals. *See id.* at 259 n.1. Health Choice ended two identical federal suits against Gilead Sciences rather than meet the same fate. A New Jersey appellate court held its New Jersey copycat suit barred. *State ex rel. Health Choice Advocates, LLC v. Gilead Scis., Inc.*, 2024 WL 875636 (N.J. Super. Ct. App. Div. Mar. 1, 2024) (per curiam). And Health Choice walked away from two earlier petitions in this State in the very court below. *State ex rel. Health Choice Advocates, LLC v. Gilead Scis., Inc.*, No. 20-0416 (71st Dist. Ct., Harrison County, Tex.).

Yet the theory lives on in Harrison County. Three years into this suit, on a complete summary-judgment record, the trial court denied summary judgment without explanation in a one-page order, thus allowing this theory to proceed to trial. The Texas Medicaid Fraud Prevention Act is a penal statute that reaches only conduct falling clearly within its terms. *Malouf v. State ex rels. Ellis*, 694 S.W.3d 712, 721 (Tex. 2024). Its text commands that it be applied "in relation to applicable federal laws and regulations" to maximize access to care. Tex. Hum. Res. Code § 32.002(a). And this Court construes the Texas Medicaid Fraud Prevention Act's (the "Act") provisions in harmony with the federal statutes they mirror. *State v. Alvarez*, No. 15-25-00034-CV, 2026 WL 1900046, at *6 (Tex. App.—15th Dist. July 2, 2026, no pet. h.).

Federal law is settled that support programs integral to a prescribed medicine that offer prescribers no independent value are not remuneration. The essential elements of remuneration and inducement therefore cannot be proved—not after more discovery, not at trial, not ever. In short, here a serial relator is marching a qui tam theory that federal law rejects, Texas law forecloses, and no facts can rescue toward a punitive trial that only this Court's writ can prevent—both in this case and in the parallel suits queuing up behind it.

This brief advances three points. *First*, this is the exceptional case in which mandamus review of a summary-judgment denial is not merely available but imperative. *Second*, the trial court had no discretion to send a legally foreclosed theory to a jury. *Third*, the stakes reach well beyond this case. Parallel suits against other manufacturers are pending, and all of them turn on the core question presented here: whether Texas courts will become the refuge of last resort for qui tam theories the federal system has repeatedly rejected.

ARGUMENT

I. THIS IS THE EXCEPTIONAL CASE IN WHICH MANDAMUS REVIEW OF A SUMMARY-JUDGMENT DENIAL IS IMPERATIVE.

Mandamus requires a clear abuse of discretion and the lack of an adequate remedy by appeal. *Walker v. Packer*, 827 S.W.2d 833, 839–40 (Tex. 1992) (orig. proceeding). Both requirements are met here, and each reinforces the other. Because the dispositive question is purely legal, the trial court had no room for error—a court has no "discretion in determining what the law is." *Id.* at 840. And because the error greenlights a legally foreclosed theory for a costly punitive trial, no ultimate appeal can undo the harm.

A. Mandamus lies when trial itself would defeat the right at stake.

Mandamus is generally unavailable to review the denial of summary judgment. But this principle "is not, and cannot be, absolute." *In re Academy, Ltd.*, 625 S.W.3d 19, 32 (Tex. 2021) (orig. proceeding). The adequacy of an appeal is not a rigid rule but a practical balance of benefits and detriments. Mandamus review of significant rulings in exceptional cases preserves substantive rights from loss and spares litigants and the public "the time and money utterly wasted enduring eventual reversal."

In re Prudential Ins. Co. of Am., 148 S.W.3d 124, 136 (Tex. 2004) (orig. proceeding). The touchstone is that an appeal is no remedy at all when "the very act of proceeding to trial" would defeat the right involved. *In re McAllen Med. Ctr., Inc.*, 275 S.W.3d 458, 465 (Tex. 2008) (orig. proceeding).

The Texas Supreme Court has put the point plainly: relegating a party to a wasted trial, with justice to come someday on appeal, is no remedy at all. *Id.* at 467. The Court has applied these principles to summary-judgment denials specifically. In *In re United Services Automobile Ass'n*, 307 S.W.3d 299, 313–14 (Tex. 2010) (orig. proceeding), it directed a trial court to grant summary judgment on limitations—an ordinary affirmative defense—because forcing trial on a time-barred claim presented extraordinary circumstances meriting extraordinary relief. In *Academy*, 625 S.W.3d at 35–36, it held that trial itself would consume the protection of a federal statute barring the claims as a matter of law and directed the trial court to grant the defendant's summary-judgment motion. And just weeks ago, the Court did so again, directing rendition of judgment for a manufacturer whose liability a federal statute of repose foreclosed. *In re Bell Helicopter Servs., Inc.*, No. 24-0883 (Tex.

Apr. 24, 2026) (orig. proceeding). The rule is plain: when a purely legal bar forecloses a claim, and the costs of ignoring the error are severe and systemic, appellate courts do not sit on their hands while a case resting on a legally baseless theory is tried.

B. Every consideration that has justified mandamus review is present here.

Start with the nature of the question. Whether patient-support programs integrally tied to a manufacturer's own medicine can constitute "remuneration" or "inducement" under the Act is a question of statutory construction, which this Court reviews de novo. *In re Sanofi-Aventis U.S. LLC*, 711 S.W.3d 732, 735 (Tex. App.—15th Dist. 2025, orig. proceeding). No amount of discovery can change the answer, and no jury can be asked what a statute means. When the controlling question is purely legal, the trial court's room for error is zero, *Walker*, 827 S.W.2d at 840, and immediate review costs little and settles much, *see Prudential*, 148 S.W.3d at 136.

Next, the stakes. This is not garden-variety civil exposure. The Act's remedies are "undeniably punitive in the aggregate," imposing liability far beyond anything the State actually spent. *In re Xerox Corp.*, 555 S.W.3d 518, 527 (Tex. 2018) (orig. proceeding); *see* Tex. Hum. Res. Code

§ 36.052(a) (multiplied recoveries plus civil penalties for each unlawful act). That severity is why the Supreme Court classifies the statute as penal and construes it strictly. *Malouf*, 694 S.W.3d at 721. Forcing a defendant to a punitive trial on a theory the law forecloses inflicts precisely the harm that no verdict, and no appeal from one, can repair—the in terrorem pressure to settle a meritless case rather than risk ruinous liability. That pressure is the point of filing suits like this one; it should never be the product of an order that Texas law cannot sustain.

Then, the multiplier effect. This is not one case. Materially identical kickback theories against other manufacturers are pending in Texas courts, and this Court has already been called upon three times to superintend them. *See Sanofi-Aventis*, 711 S.W.3d at 735–36; *In re AstraZeneca Pharms. LP*, 726 S.W.3d 573 (Tex. App.—15th Dist. 2025, orig. proceeding); *In re Novartis Pharms. Corp.*, No. 15-25-00207-CV (Tex. App.—15th Dist. Apr. 30, 2026, orig. proceeding) (mem. op.). The prospect of multiple trials across related suits weighed heavily in *Academy*, 625 S.W.3d at 35, and it weighs heavily here—all the more because each suit sweeps in years of prescriptions, office visits, and reimbursement claims. *See Novartis*, dissenting op. at 6–7 (Brister, C.J.)

(explaining why the scale of these qui tam claims makes a plenary trial impracticable and the waste of judicial and public resources irreversible).

The Legislature created this Court to bring statewide coherence to significant litigation involving the State. One decision now—resolving a pure question of law—will give the district courts direction in every pending parallel case, direction that piecemeal appeals from separate final judgments would supply too late or not at all. *Cf. Prudential*, 148 S.W.3d at 136.

C. *Novartis* confirms that this petition arrives at the right time.

This Court recently declined to review, by mandamus, constitutional challenges to the Act's qui tam provisions, concluding that review at that stage was premature. *Novartis*, mem. op. at 2. Each premise of that conclusion points the other way here.

Consider the harm asserted. Novartis claimed appeal was inadequate because it faced cost-intensive discovery, and the Court answered with the settled rule that the expense and delay of litigation, without more, never make an appeal inadequate. Mem. op. at 2–3 (citing *In re Kappmeyer*, 668 S.W.3d 651, 659 (Tex. 2023) (orig. proceeding)). Gilead Sciences' injury is different in kind, not degree. The harm here is the trial itself—a trial on a claim the law forecloses—and that is the category of injury that *McAllen*, *United Services*, *Academy*, and *Bell Helicopter* all place beyond an appeal's power to cure. Indeed, on the *Novartis* panel's own framework, mandamus lies where denying relief would waste judicial and public resources. *See Kappmeyer*, 668 S.W.3d at 659. Trying a legally doomed, punitive-exposure case—while parallel suits queue up behind it—is that waste.

The case's posture confirms the point. Novartis arrived at the Rule 91a threshold, before any factual development, and the Court was unpersuaded that letting the case proceed to discovery had distorted the dynamics of the litigation. Mem. op. at 4. This case lies on the far side of that reasoning. Factual development has run its course; the summary-judgment record is complete; and the purely statutory question emerged unchanged, because no record can alter what a statute means. The *Novartis* panel expressly looked ahead to a case arriving "from summary judgment or after trial, when the record will be developed." *Id.* This is that case, at that stage, presenting a discrete question of statutory construction rather than a sweeping constitutional attack—and with the governing law clarified in the interim by *Alvarez*. *Novartis* was an exercise of restraint about timing. Its own terms mark this petition as not merely timely but urgent.

II. The Trial Court Had No Discretion to Send a Legally Foreclosed Theory to Trial.

A. The Act is penal and reaches only conduct clearly within its terms.

The Supreme Court of Texas has held that the Act is "the very type of penal statute" courts must construe strictly. *Malouf*, 694 S.W.3d at 721. A plaintiff must show that the defendant engaged in conduct falling clearly within the statute's terms, and any ambiguity is resolved against enforcement. *Id.* The Act is a potent weapon against genuine fraud on the Medicaid program. *Xerox*, 555 S.W.3d at 525. But precisely because its penalties are so severe, its boundaries must be policed—and the Supreme Court has been doing so. Twice in the last two years it has rejected expansive readings of the Act: in *Malouf*, and again just weeks ago. *See Lab'y Corp. of Am. Holdings v. State*, No. 25-0127, 2026 WL 1782485 (Tex. June 19, 2026) (rejecting the State's reading of the Act's false-statement provisions). Strict construction is not a tiebreaker for a jury to apply after the fact. It is a rule of law that determines, before trial, whether the alleged conduct is within the statute at all.

B. Texas law tracks federal law—and federal law forecloses the relator's theory.

The Legislature told courts how to read this statute: it is to be construed and applied "in relation to applicable federal laws and regulations" so that adequate, high-quality health care is available to Texans who cannot pay for it. Tex. Hum. Res. Code § 32.002(a). That instruction reflects how Medicaid works. It is a cooperative program, jointly funded and operated by the federal and state governments. *El Paso Hosp. Dist. v. Tex. Health & Human Servs. Comm'n*, 247 S.W.3d 709, 711 (Tex. 2008). And the Act's anti-kickback provisions replicate the federal Anti-Kickback Statute nearly word for word. *Compare* Tex. Hum. Res. Code § 32.039(b)(5)–(7), *with* 42 U.S.C. § 1320a-7b(b)(2). This Court has already drawn the natural conclusion: where the Act's provisions parallel federal law, federal cases interpreting the parallel provisions are "instructive" and guide the Texas analysis. *Alvarez*, 2026 WL 1900046, at *6.

Federal law on this question is not close. For more than fifteen years, the Office of Inspector General of the U.S. Department of Health and Human Services has carefully distinguished between items or services that carry independent value to prescribers versus support that is integral to the manufacturer's own product—holding that the latter is not remuneration at all. *See, e.g.*, OIG Advisory Op. No. 10-04 (May 6, 2010). When the relator's network pressed the contrary theory in federal court, the United States moved to end the suits, and the federal courts of appeals agreed that the government's judgment was sound. The Seventh Circuit thus summarized the government's consistent position, expressed across nearly a dozen guidance documents: the challenged conduct is not only lawful but "beneficial to patients and the public." *United States ex rel. CIMZNHCA, LLC v. UCB, Inc.*, 970 F.3d 835, 852 (7th Cir. 2020). The Fifth Circuit affirmed dismissal of an affiliate's flagship case—the same network, the same theory, the same federal district where Health Choice first sued Gilead Sciences. *Eli Lilly*, 4 F.4th at 259–60.

Put those pieces together and the relator's theory has nowhere to stand. Under section 32.002(a), *Alvarez*, and *Malouf*, the words "remuneration" and "inducement" cannot be stretched to punish product-integrated patient support that federal authorities have deemed lawful for decades. Reading identical statutory language to produce opposite results on either side of a jointly funded program would defy both text and purpose. It would transform patient assistance that is lawful nationwide under federal law into a multiplied-liability offense in Texas alone. It also would restrict—not expand—Texans' access to care, inverting section 32.002(a)'s command. And it would create exactly the fair-notice problem that strict construction aims to prevent—punitive liability for industry-standard conduct that the enforcing federal agencies publicly approved while it occurred. A trial court has no discretion to adopt that reading, and its unexplained refusal to reject it was a clear abuse of discretion. *Walker*, 827 S.W.2d at 840.

C. *Shire* decided nothing to the contrary.

Expect the plaintiff to answer with *In re Shire PLC*, 633 S.W.3d 1 (Tex. App.—Texarkana 2021, orig. proceeding). *Shire* holds far less than the plaintiff needs. *Shire* arose under Rule 91a, and its holding was about pleadings: federal guidance did not render the relator's claims baseless on the face of the petition. The court took pains to distinguish Rule 91a's pleading standard from the summary-judgment standard that governs here. *Id.* at 20–21. And it decided the case years before *Malouf* announced the Act's strict construction and before this Court decided *Alvarez*. A pleadings ruling from another court, under a different standard, applying a superseded interpretive baseline, cannot justify a trial that current law forbids. Even if *Shire* assumed in passing that summary-judgment denials are never reviewable by mandamus, *id.* at 20–21 & n.12, the Supreme Court's decisions in *Academy* and *Bell Helicopter* foreclose that view.

III. TEXAS COURTS SHOULD NOT BECOME THE REFUGE FOR FEDERALLY REJECTED QUI TAM THEORIES.

The pattern here is not subtle. A network of shell entities filed eleven federal qui tam suits against thirty-eight defendants on this theory. *Eli Lilly*, 4 F.4th at 259. The United States—the party in whose name those suits were brought—investigated them and moved to end them, and federal courts sustained those dismissals.

Health Choice saw the writing on the wall. It voluntarily dismissed its two federal suits against Gilead Sciences. *United States ex rel. Health Choice Advocates, LLC v. Gilead Scis., Inc.*, No. 5:17-cv-121 (E.D. Tex. July 27, 2018); No. 5:18-cv-95 (E.D. Tex. Mar. 11, 2020). It watched New Jersey's courts hold its New Jersey version of this suit barred. *State ex rel. Health Choice Advocates, LLC*, 2024 WL 875636 (N.J. Super. Ct. App. Div. Mar. 1, 2024). It abandoned two earlier petitions in the court below. *State ex rel. Health Choice Advocates, LLC*, No. 20-0416 (71st Dist. Ct., Harrison County, Tex.). Then it refiled the same theory under a Texas label, in a single county, and the State intervened. That is regulatory arbitrage, not fraud enforcement.

The Act exists to protect the integrity of the Texas Medicaid program. *Xerox*, 555 S.W.3d at 525. Nothing in it suggests the Legislature designed Texas courts as a secondary market for claims the United States has repudiated—claims that, once the government responsible for the program declines them, overwhelmingly fail. *See* Jonathan Diesenhaus, U.S. Chamber Inst. for Legal Reform, *The Great Myths of State False Claims Acts* 24 (Feb. 2018) (collecting Department of Justice statistics showing that the vast majority of declined qui tam suits are ultimately dismissed).

But a secondary market is what Texas courts will become if a serial relator can convert an unexplained, one-page denial of summary judgment into an unreviewable path to a punitive trial. The economic incentives will take care of the rest. Multiplied recoveries and per-act penalties give even a meritless case settlement value, and the order below—if it stands—becomes the template: survive to trial by summary order, then price the settlement off the penalty exposure rather than the merits. Indeed, if one wanted to send a signal that serves as a lawsuitgenerating machine—an unending source of billable hours for lawyers and crowded dockets for Texas judges and their clerks—one could hardly do better than to declare that Texas is the place where federally rejected qui tam theories come to feast.

Nor is the harm confined to defendants. The programs at issue help patients obtain, understand, and correctly take medicines they have already been prescribed—the very reason the federal government gave for shutting these suits down. *See UCB*, 970 F.3d at 851–52. A manufacturer facing punitive exposure in one state for a nationwide, federally accepted program will not run fifty versions of it; it will scale the program back everywhere or switch it off in Texas. Either way, the cost falls on the patients whom section 32.002(a) says this statute serves.

This Court sits where these threads converge. The Legislature created it to bring coherent, statewide resolution to significant litigation involving the State, and it has already superintended this cluster of Harrison County qui tam suits. *See Sanofi-Aventis*, 711 S.W.3d at 735–36; *AstraZeneca*, 726 S.W.3d 573. Members of the Texas Supreme Court, for their part, have urged that the recurring questions these Harrison County suits present should reach a statewide court sooner rather than later. *See In re Novartis Pharms. Corp.*, 722 S.W.3d 720, 723–24 (Tex. 2025) (Young, J., joined by Sullivan, J., concurring in denial of petition for writ of mandamus).

This Court's answer here will govern not one trial but many. Granting review would give the district court the direction that Texas law already supplies—and would tell relators everywhere that Texas courtrooms are not the venue of last resort for repudiated legal theories.

PRAYER

The Court should grant the petition for writ of mandamus and direct the trial court to vacate its order denying summary judgment and to render summary judgment for Gilead Sciences.

August 17, 2026 Respectfully submitted,

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CERTIFICATE OF COMPLIANCE

In compliance with Texas Rule of Appellate Procedure 9.4(i)(2), I certify that this brief contains 3,587 words, excluding the portions of the brief exempted by Rule 9.4(i)(1).

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CERTIFICATE OF SERVICE

I certify that, on August 17, 2026, a true and correct copy of the foregoing Brief of Amicus Curiae Washington Legal Foundation in Support of Relator was served via electronic service on:

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