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UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF CALIFORNIA

In re  
BORREGO COMMUNITY  
HEALTH FOUNDATION,  
Debtor and Debtor In  
Possession.

Case No. 22-02384-11  
Chapter 11 Case

**CERTIFICATE OF SERVICE BY  
KURTZMAN CARSON CONSULTANTS,  
LLC RE NOTICE OF WITHDRAWAL,  
AMENDED TENTATIVE RULING**

**[No Hearing Required]**

Judge: Honorable Laura S. Taylor

I, Alejandro Guerra, do declare and state as follows:

1. I am a Consultant at Kurtzman Carson Consultants, LLC, claims and noticing agent for the debtor and debtor-in-possession Borrego Community Health Foundation (the “Debtor”), in the referenced chapter 11 bankruptcy case.

2. On February 13, 2024, at my direction and under my supervision, employees of Kurtzman Carson Consultants caused the following document to be served via Email upon the service list attached hereto as **Exhibit A**; and via First Class Mail upon the service list attached hereto as **Exhibit B**:

*(Continued on Next Page)*



- 1 • *Notice of Withdrawal of Debtor's Fourth Motion for Entry of an Order*  
2 *Pursuant to Section 1121 of the Bankruptcy Code Extending the Exclusive*  
3 *Period to File a Chapter 11 Plan and Solicit Acceptances* [Docket No. 1306]

4  
5 3. Furthermore, on February 13, 2024, at my direction and under my  
6 supervision, employees of Kurtzman Carson Consultants caused the following  
7 document to be served via Email upon the service list attached hereto as **Exhibit A**:

- 8 • *Amended Tentative Ruling re: Debtor's Notice of Motion and Fourth Motion*  
9 *for Entry of an Order Pursuant to Section 1121 of the Bankruptcy Code*  
10 *Extending the Exclusive Periods to File a Chapter 11 Plan and Solicit*  
11 *Acceptances; Memorandum of Points and Authorities in Support Thereof;*  
12 *Declaration of Isaac Lee* [Docket No. 1307]

13  
14 4. I declare under penalty of perjury under the laws of the United States of  
15 America, that the foregoing is true and correct and that if called upon as a witness, I  
16 could and would competently testify thereto.

17  
18 Executed this 16<sup>th</sup> day of February, 2024, at El Segundo, CA.

19  
20 /s/ Alejandro Guerra

21 Alejandro Guerra  
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# EXHIBIT A

**Exhibit A**  
**Core/2002 Service List**  
**Served via Electronic Mail**

| Description   | CreditorName                               | CreditorNoticeName   | Email   |
|---|--|--|---|
| Counsel for Ally Bank , c/o AIS Portfolio Services, LLC   | AIS Portfolio Services, LLC                | Ally Bank Department   | ECFNotices@aisinfo.com  |
| Secured Creditors   | Ally Auto                                  |  | corporatefinance@ally.com   |
| Secured Creditors   | Ally Auto                                  |  | support@invest.ally.com   |
| Counsel for Premier Healthcare Management, Inc, Inland Valley Investments, LLC & DRP Holdings, LLC, Promenade Square, LLC         | Barnes & Thornburg LLP                     | Ali M. M. Mojdehi  | amojdehi@btlaw.com  |
| Counsel for San Ysidro Health   | Bienert Katzman Littrell Williams LLP      | Anthony R. Bisconti  | tbisconti@bklwlaw.com   |
| Counsel for AB Staffing Solutions, LLC  | Bryan Cave Leighton Paisner LLP            | Kyle S. Hirsch   | kyle.hirsch@bclplaw.com   |
| Counsel for AB Staffing Solutions, LLC  | Bryan Cave Leighton Paisner LLP            | Olivia J. Scott  | olivia.scott3@bclplaw.com   |
| Counsel for Mckesson Corporation, on Behalf of itself and Certain Corporate Affiliates  | Buchalter                                  | Jeffrey K. Garfinkle   | jgarfinkle@buchalter.com  |
| Counsel for Creditor Oracle America, Inc., successor in interest to NetSuite, Inc.  | Buchalter, A Professional Corporation      | Shawn M. Christianson, Esq.  | schristianson@buchalter.com   |
| California Department of Public Health  | CA Department of Public Health             | Stephanie Spich  | stephanie.spich@cdph.ca.gov   |
| California Health & Human Services Agency   | CA Health & Human Services Agency (CalHHS) | Mark Ghaly, Secretary & Jared Goldman, General Counsel                   | Mark.Ghaly@chhs.ca.gov;<br>Jared.Goldman@chhs.ca.gov                  |
| Center for Medicare and Medicaid Services   | Center for Medicare and Medicaid Services  |  | OPOLE_IFM_Bankruptcy@cms.hhs.gov                                      |
| Counsel for Tower Energy Group, Inc.  | Elkins Kalt Weintraub Reuben Gartside LLP  | Michael I. Gottfried, Esq., Roye Zur, Esq.                               | mgottfried@elkinskalt.com;<br>rzur@elkinskalt.com                     |
| Secured Creditors   | Enterprise Fleet Management                |  | fleetquestions@erac.com   |
| Secured Creditors   | First American Equipment Finance           |  | mail@faef.com   |
| Counsel for Ramona Crossings, LLC   | Franklin Soto Leeds LLP                    | Dean T. Kirby, Jr.   | dkirby@fsl.law  |
| Committee Member  | Greenway Health, LLC                       | Attn Stephen Janes   | Stephen.janes@greenwayhealth.com                                      |
| Counsel for Philip D. Szold, M.D., Inc. dba La Mesa Pediatrics, Desert AIDS Project, Inc. dba DAP                                 | Hanson Bridgett LLP                        | Anthony J. Dutra   | adutra@hansonbridgett.com   |
| Claims and Noticing Agent   | KCC  | P. Joe Morrow IV   | BorregoHealthInfo@kccllc.com  |
| Counsel for Waleed Stephan, D.D.S., W.A. Stephan, a Dental Corporation, Marcelo G. Toledo, D.D.S. and Marcelo Toledo D.D.S., Inc. | Keith H. Rutman                            |  | krutman@krutmanlaw.com  |
| Counsel for Premier Healthcare Management, Inc (Top Creditor)   | Kyle Harris LLP                            | Laura Kimberly Gantney, Jeffrey Harris                                   | lgantney@klhipbiz.com;<br>jharris@KLHIPBIZ.com                        |
| Counsel for Greenway Health, LLC  | Law Office Of Christine E. Baur            | Christine E. Baur, Esq.  | christine@baurbklaw.com   |
| Committee Member  | McKesson Corporation                       | Attn Pamela M. Craik, Regional Credit Director                           | Pamela.craik@McKesson.com   |
| Committee Member  | Mustafa Bilal, DDS, Inc.                   | Attn Mustafa Bilala, DDS   | VillageDentalGrouponline@yahoo.com                                    |
| California Attorney General   | Office of the Attorney General             | Darin L Wessel, Deputy Attorney General                                  | Darin.Wessel@doj.ca.gov   |
| Co-Counsel for U.S. Department of Health and Human Services   | Office of the U.S. Attorney                | Leslie M. Gardner and Randy S. Grossman                                  | leslie.gardner2@usdoj.gov   |
| Counsel for the Official Committee of Unsecured Creditors   | Pachulski Stang Ziehl & Jones LLP          | Jeffrey N. Pomerantz, Esq., Teddy M. Kapur, Esq., Steven W. Golden, Esq. | jpomerantz@pszjlaw.com;<br>tkapur@pszjlaw.com;<br>sgolden@pszjlaw.com |
| Counsel for or Family Health Centers of San Diego   | Polsinelli LLP                             | Randy B. Soref   | rsoref@polsinelli.com   |
| Counsel for Creditor Pourshirazi & Youssefi Dental Corporation  | Pourshirazi & Youssefi Dental              | c/o Brinkman Law Group, PC   | firm@brinkmanlaw.com;<br>office@brinkmanlaw.com                       |
| Committee Member  | Pourshirazi & Youssefi Dental Corporation  | Attn Homayoun Pourshirazi  | Drhpemail@gmail.com   |
| Counsel for BETA Healthcare Group ("BETA")  | Pyle Sims Duncan & Stevenson, APC          | Gerald N. Sims, Susan C. Stevenson                                       | jerrys@psdslaw.com;<br>sstevenson@psdslaw.com                         |
| SEC Headquarters  | Securities & Exchange Commission           | Secretary of the Treasury  | SECBankruptcy-OGC-ADO@SEC.GOV   |
| Counsel for Creditor Anna Navarro   | Small Law PC                               | Kelly Ann Tran   | kelly@smalllawcorp.com  |

**Exhibit A**  
**Core/2002 Service List**  
**Served via Electronic Mail**

| Description  | CreditorName                           | CreditorNoticeName                    | Email   |
|--|--|---------------------------------------|---|
| Counsel for California Physicians Service dba Blue Shield of California and Blue Shield of California Promise Health Plan, California Physicians Service dba Blue Shield of California and Blue Shield of California Promise Health Plan | Snell & Wilmer L.L.P.                  | Andrew B. Still & Michael B. Reynolds | astill@swlaw.com;<br>mreynolds@swlaw.com                |
| Counsel for Inland Empire Health Plan  | Squire Patton Boggs (US) LLP           | Helen H. Yang                         | helen.yang@squirepb.com                                 |
| Counsel for Inland Empire Health Plan  | Squire Patton Boggs (US) LLP           | Kelly E. Singer                       | kelly.singer@squirepb.com                               |
| Office of The United States Trustee  | US Trustee for Southern District of CA | Tiffany Carroll                       | tiffany.l.carroll@usdoj.gov;<br>ustp.region15@usdoj.gov |
| Secured Creditors  | VAR Technology Finance                 |                                       | karchibald@LEAFnow.com;<br>info@vartechologyfinance.com |
| Committee Member   | Vista Village Family Dentistry         | Attn Mehrnaz Irani, DDS               | info@vistavillagefamilydentistry.com                    |
| Committee Member   | Vitamin D Public Relations, LLC        | Attn Denise Gitsham                   | dgitsham@gmail.com                                      |
| Committee Member   | We Klean Inc.                          | Attn Aracelis Gutierrez               | agutierrez@weklean.org;<br>nleal@weklean.org            |

# **EXHIBIT B**

**Exhibit B**  
**Core/2002 Service List**  
**Served via First Class Mail**

| Description   | CreditorName                               | CreditorNoticeName                                      | Address1                           | Address2   | City          | State | Zip        |
|---|--|---|------------------------------------|--|---------------|-------|------------|
| Counsel for Ally Bank , c/o AIS Portfolio Services, LLC   | AIS Portfolio Services, LLC                | Ally Bank Department                                    | 4515 N Santa Fe Ave. Dept. APS     | Account:<br>XXXXXXXX3052,<br>XXXXXXXX5851,<br>XXXXXXXX9419 | Oklahoma City | OK    | 73118      |
| Secured Creditors   | Ally Auto                                  |   | PO Box 78369                       |  | Phoenix       | AZ    | 85062-8369 |
| Secured Creditors   | Ally Auto                                  |   | 6716 Grade Lane                    | Building No 9,<br>Suite 910                                | Louisville    | KY    | 40213      |
| Office of the Attorney General of the United States   | Attorney General of the United States      | US DOJ  | 950 Pennsylvania Avenue, NW        |  | Washington    | DC    | 20530-0001 |
| Counsel for Premier Healthcare Management, Inc, Inland Valley Investments, LLC & DRP Holdings, LLC, Promenade Square, LLC | Barnes & Thornburg LLP                     | Ali M. M. Mojdehi                                       | 655 West Broadway,<br>Suite 1300   |  | San Diego     | CA    | 92101      |
| Counsel for San Ysidro Health   | Bienert Katzman Littrell Williams LLP      | Anthony R. Bisconti                                     | 360 E. 2nd Street,<br>Suite 625    |  | Los Angeles   | CA    | 90012      |
| Counsel for AB Staffing Solutions, LLC  | Bryan Cave Leighton Paisner LLP            | Kyle S. Hirsch  | 2 North Central Avenue, Suite 2100 |  | Phoenix       | AZ    | 85004      |
| Counsel for AB Staffing Solutions, LLC  | Bryan Cave Leighton Paisner LLP            | Olivia J. Scott   | 1920 Main Street,<br>Suite 1000    |  | Irvine        | CA    | 92614-7276 |
| Counsel for Mckesson Corporation, on Behalf of itself and Certain Corporate Affiliates                                    | Buchalter                                  | Jeffrey K. Garfinkle                                    | 18400 Von Karman Ave., Suite 800   |  | Irvine        | CA    | 92612      |
| Counsel for Creditor Oracle America, Inc., successor in interest to NetSuite, Inc.  | Buchalter, A Professional Corporation      | Shawn M. Christianson, Esq.                             | 425 Market Street,<br>Suite 2900   |  | San Francisco | CA    | 94105-3493 |
| California Department of Industrial Relations   | CA Department of Industrial Relations      | Labor Law Enforcement                                   | 1550 West Main Street              |  | El Centro     | CA    | 92243-2105 |
| California Department of Public Health  | CA Department of Public Health             | Stephanie Spich   | PO Box 997377, MS 0500             |  | Sacramento    | CA    | 95899-7377 |
| California Department of Tax & Fee Administration   | CA Department of Tax & Fee Administration  | Account Information Group, MIC 29                       | PO Box 942879                      |  | Sacramento    | CA    | 94279-0029 |
| California Department of Tax & Fee Administration   | CA Department of Tax & Fee Administration  | Special Operations Bankruptcy Team, MIC 74              | PO Box 942879                      |  | Sacramento    | CA    | 94279-0074 |
| California Department of Tax & Fee Administration   | CA Department of Tax & Fee Administration  |   | PO Box 942879                      |  | Sacramento    | CA    | 94279      |
| California Division of Labor Standards Enforcement  | CA Division of Labor Standards Enforcement |   | 7575 Metropolitan Drive, Ste 210   |  | San Diego     | CA    | 92108-4424 |
| California Employment Development Department  | CA Employment Development Department       | Bankruptcy Unit, MIC 92E                                | PO Box 826880                      |  | Sacramento    | CA    | 94280-0001 |
| California Employment Development Department  | CA Employment Development Department       |   | PO Box 120831                      |  | San Diego     | CA    | 92112-0831 |
| California Employment Development Department  | CA Employment Development Office           |   | 800 Capitol Mall                   |  | Sacramento    | CA    | 95814      |
| California Franchise Tax Board  | CA Franchise Tax Board                     | Bankruptcy Section                                      | PO Box 2952                        | MS A-340   | Sacramento    | CA    | 95812-2952 |
| California Health & Human Services Agency   | CA Health & Human Services Agency (CalHHS) | Mark Ghlaly, Secretary & Jared Goldman, General Counsel | 1215 O Street                      |  | Sacramento    | CA    | 95814      |

**Exhibit B**  
**Core/2002 Service List**  
**Served via First Class Mail**

| Description   | CreditorName                              | CreditorNoticeName   | Address1                             | Address2       | City            | State | Zip        |
|---|---|--|--------------------------------------|----------------|-----------------|-------|------------|
| California State Board of Pharmacy  | CA State Board of Pharmacy                |  | 1625 North Market Boulevard          |                | Sacramento      | CA    | 95834      |
| Center for Medicare and Medicaid Services   | Center for Medicare and Medicaid Services |  | 90 - 7th Street, Suite 5-300         |                | San Francisco   | CA    | 94103-6706 |
| Counsel for Tower Energy Group, Inc.  | Elkins Kalt Weintraub Reuben Gartside LLP | Michael I. Gottfried, Esq., Roye Zur, Esq.                               | 10345 W. Olympic Blvd.               |                | Los Angeles     | CA    | 90064      |
| Secured Creditors   | Enterprise Fleet Management               |  | 6330 Marindustry Dr, Ste 210         |                | San Diego       | CA    | 92121      |
| Secured Creditors   | First American Equipment Finance          |  | 211 High Point Drive                 |                | Victor          | NY    | 14564      |
| Counsel for Ramona Crossings, LLC   | Franklin Soto Leeds LLP                   | Dean T. Kirby, Jr.   | 444 West C Street                    | Suite 1750     | San Diego       | CA    | 92101      |
| Committee Member  | Greenway Health, LLC                      | Attn Stephen Janes   | 4301 W. Boy Scout Blvd.              | Suite 800      | Tampa           | FL    | 33607      |
| Counsel for Philip D. Szold, M.D., Inc. dba La Mesa Pediatrics, Desert AIDS Project, Inc. dba DAP                                 | Hanson Bridgett LLP                       | Anthony J. Dutra   | 425 Market Street, 26th Floor        |                | San Francisco   | CA    | 94105      |
| IRS   | Internal Revenue Service                  | Centralized Insolvency Operation   | PO Box 7346                          |                | Philadelphia    | PA    | 19101-7346 |
| Counsel for Waleed Stephan, D.D.S., W.A. Stephan, a Dental Corporation, Marcelo G. Toledo, D.D.S. and Marcelo Toledo D.D.S., Inc. | Keith H. Rutman                           |  | 501 West Broadway, Ste 1650          |                | San Diego       | CA    | 92101-3541 |
| Counsel for Premier Healthcare Management, Inc (Top Creditor)   | Kyle Harris LLP                           | Laura Kimberly Gantney, Jeffrey Harris                                   | 2305 Historic Decatur Rd             | Suite 100      | San Diego       | CA    | 92106      |
| Counsel for Greenway Health, LLC  | Law Office Of Christine E. Baur           | Christine E. Baur, Esq.  | 4653 Carmel Mountain Road            | Suite 308 #332 | San Diego       | CA    | 92130      |
| Committee Member  | McKesson Corporation                      | Attn Pamela M. Craik, Regional Credit Director                           | 3775 Seaport Blvd.                   |                | West Sacramento | CA    | 95691      |
| Committee Member  | Mustafa Bilal, DDS, Inc.                  | Attn Mustafa Bilal, DDS  | 1210 S. Brookhurst St.               |                | Anaheim         | CA    | 92804      |
| California Attorney General   | Office of the Attorney General            | Consumer Protection Section, Attn Bankruptcy Notices                     | 455 Golden Gate Avenue, Suite 11000  |                | San Francisco   | CA    | 94102-7004 |
| California Attorney General   | Office of the Attorney General            | Darin L Wessel, Deputy Attorney General                                  | 600 West Broadway, Suite 1800        | P.O. Box 85266 | San Diego       | CA    | 92186-5266 |
| California Attorney General   | Office of the Attorney General            |  | 1300 I Street                        |                | Sacramento      | CA    | 95814-2919 |
| Co-Counsel for U.S. Department of Health and Human Services   | Office of the U.S. Attorney               | Leslie M. Gardner and Randy S. Grossman                                  | 880 Front Street, Room 6293          |                | San Diego       | CA    | 92101-8893 |
| Counsel for the Official Committee of Unsecured Creditors   | Pachulski Stang Ziehl & Jones LLP         | Jeffrey N. Pomerantz, Esq., Teddy M. Kapur, Esq., Steven W. Golden, Esq. | 10100 Santa Monica Blvd., 13th Floor |                | Los Angeles     | CA    | 90067-4100 |
| Counsel for or Family Health Centers of San Diego   | Polsinelli LLP                            | Randy B. Soref   | 2049 Century Park East, Suite 2900   |                | Los Angeles     | CA    | 90067      |
| Counsel for Creditor Pourshirazi & Youssefi Dental Corporation  | Pourshirazi & Youssefi Dental Corporation | c/o Brinkman Law Group, PC   | 543 Country Club Drive, Suite B      |                | Wood Ranch      | CA    | 93065      |
| Committee Member  | Pourshirazi & Youssefi Dental Corporation | Attn Homayoun Pourshirazi  | 31569 Canyon Estates Dr.             | Suite 120      | Lake Elsinore   | CA    | 92532      |
| Counsel for BETA Healthcare Group ("BETA")  | Pyle Sims Duncan & Stevenson, APC         | Gerald N. Sims, Susan C. Stevenson                                       | 1620 Fifth Avenue, Suite 400         |                | San Diego       | CA    | 92101      |



**Exhibit B**  
**Core/2002 Service List**  
**Served via First Class Mail**

| Description  | CreditorName                               | CreditorNoticeName                       | Address1                                  | Address2                          | City          | State | Zip        |
|--|--|--|---|-----------------------------------|---------------|-------|------------|
| Counsel for Ramona Crossings, LLC  | Ramona Crossings, LLC                      | Carrie Arendt                            | 14908 Gavan Vista Road                    |                                   | Poway         | CA    | 92064      |
| Secured Creditors  | Ricoh USA                                  |  | PO Box 31001-0850                         |                                   | Pasadena      | CA    | 91110      |
| SEC Headquarters   | Securities & Exchange Commission           | Secretary of the Treasury                | 100 F St NE                               |                                   | Washington    | DC    | 20549      |
| Counsel for Creditor Anna Navarro  | Small Law PC                               | Kelly Ann Tran                           | 501 W. Broadway, Suite 1360               |                                   | San Diego     | CA    | 92101      |
| Counsel for California Physicians Service dba Blue Shield of California and Blue Shield of California Promise Health Plan, California Physicians Service dba Blue Shield of California and Blue Shield of California Promise Health Plan | Snell & Wilmer L.L.P.                      | Andrew B. Still & Michael B. Reynolds    | 600 Anton Blvd, Suite 1400                |                                   | Costa Mesa    | CA    | 92626-7689 |
| Counsel for Inland Empire Health Plan  | Squire Patton Boggs (US) LLP               | Helen H. Yang                            | 555 South Flower Street, 31st Floor       |                                   | Los Angeles   | CA    | 90071      |
| Counsel for Inland Empire Health Plan  | Squire Patton Boggs (US) LLP               | Kelly E. Singer                          | 2325 E. Camelback Road, Suite 700         |                                   | Phoenix       | AZ    | 85016      |
| US Department of Health and Human Services   | US Department of Health and Human Services | Office of the General Counsel, Region IX | 90 - 7th Street, Suite 4-500              |                                   | San Francisco | CA    | 94103-6705 |
| Office of The United States Trustee  | US Trustee for Southern District of CA     | Haeji Hong                               | 880 Front Street, Third Floor, Suite 3230 |                                   | San Diego     | CA    | 92101      |
| Office of The United States Trustee  | US Trustee for Southern District of CA     | Tiffany Carroll                          | 880 Front Street, Suite 3230              | Edward J Schwartz Office Building | San Diego     | CA    | 92101      |
| Committee Member   | Vista Village Family Dentistry             | Attn Mehrnaz Irani, DDS                  | 950 Civic Center Dr.                      | Suite B                           | Vista         | CA    | 92083      |
| Committee Member   | Vitamin D Public Relations, LLC            | Attn Denise Gitsham                      | 2534 Mankas Corner Rd.                    |                                   | Fairfield     | CA    | 94534      |
| Committee Member   | We Klean Inc.                              | Attn Aracelis Gutierrez                  | 1444 Main Street                          | #581                              | Ramona        | CA    | 92065      |
| Secured Creditors  | Wells Fargo Dealer Services                |  | PO Box 51963                              |                                   | Los Angeles   | CA    | 90051-6263 |
| Secured Creditors  | Wells Fargo Dealer Services                |  | 420 Montgomery Street                     |                                   | San Francisco | CA    | 94104      |