Case 22-02384-LT11 Filed 12/11/24 Entered 12 CSD 1001A [07/01/18](Page 1)	2/13/24 21:10:53 Doc 1515 Pg. 1 of Docket #1515 Date Filed: 12/11/2024
Name, Address, Telephone No. & I.D. No.	
Name, Address, Telephone No. & I.D. No.	8° 2 6 3 3 C
Samuel R. Maizel (Bar No. 189301)	Order Entered on
Tania M. Moyron (Bar No. 235736)	December 11, 2024
DENTONS US LLP	by Clerk U.S. Bankruptcy Court
601 South Figueroa Street, Suite 2500	Southern District of California
Los Angeles, CA 90017-5704	A A A A A A A A A A A A A A A A A A A
Telephone: 213/623-9300	ERN WY CENT
Attorneys for Post-Effective Date Debtor and the Co-Liquidating Trustee	DISTRICT OF
Jeffrey N. Pomerantz (Bar No. 143717) Steven W. Golden (Admitted Pro Hac Vice) PACHULSKI STANG ZIEHL & JONES LLP 10100 Santa Monica Blvd., 13th Floor Los Angeles, CA 90067 Telephone: 310/277-6910 Attorneys for the Co-Liquidating Trustee	
UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF CALIFORNIA	
325 West F Street, San Diego, California 92101-6991	
In Re	BANKRUPTCY NO.
BORREGO COMMUNITY HEALTH FOUNDATION,	22-02384-LT11
Debtor.	

### ORDER ON

### STIPULATION BY AND AMONG THE POST-EFFECTIVE DATE DEBTOR, THE LIQUIDATING TRUSTEE, THE CO-LIQUIDATING TRUSTEES AND SUREN CHTCHYAN REGARDING CLAIM NO. 94

The court orders as set forth on the continuation pages attached and numbered 2 through 2 with

exhibits, if any, for a total of 18 pages. Stipulation Docket Entry No. 1510.

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DATED: December 11, 2024

Judge, United States Bankruptcy Court



CSD 1001A LA:4936-2551-3733.1 10283.002

# Case 22-02384-LT11 Filed 12/11/24 Entered 12/13/24 21:10:53 Doc 1515 Pg. 2 of CSD 1001A [07/01/18](Page 2) 22 CRDER ON STIPULATION BY AND AMONG SUREN CHTCHYAN REGARDING CLAIM NO. 94

DEBTOR: BORREGO COMMUNITY HEALTH FOUNDATION

CASE NO: 22-02384-LT11

On December 11, 2024, Borrego Community Health Foundation (the Post-Effective Date Debtor), The Liquidating Trustee, the Co-Liquidating Trustees and Suren Chtchyan filed a *Stipulation By and Among the Post-Effective Date Debtor, The Liquidating Trustee, The Co-Liquidating Trustees And Suren Chtchyan Regarding Claim No. 94* [Docket No. 1510] (the "Stipulation").

### IT IS HEREBY ORDERED:

1. That the Stipulation, attached hereto as **Exhibit 1**, is approved in its entirety.

2. That the terms and conditions of the Stipulation shall be binding upon the parties and are hereby fully incorporated into this Order by this reference.



Case 22-02384-LT11 Filed 12/11/24 Entered 12/13/24 21:10:53 Doc 1515 Pg. 3 of 22

# **EXHIBIT 1**

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0066-620 (612)	1 2 3 4 5 6 7 8 9 10 11 12 13 14	TANIA M. MO tania.moyron@ DENTONS US 601 South Figu Los Angeles, C. Telephone: 213 Facsimile: 213 Attorneys for th Debtor and the Jeffrey N. Pomo Steven W. Gold PACHULSKI S 10100 Santa Mo Los Angeles, C Telephone: 310 Facsimile: 310- Email: jpomera sgolden@pszjla	LLP eroa Street, Suit alifornia 90017- 3 623-9300 3 623-9924 ne Post-Effective Co-Liquidating erantz (Bar No. len (Admitted P: STANG ZIEHL onica Blvd., 13t A 90067 0-277-6910 201-0760 ntz@pszjlaw.co w.com ne Co-Liquidatin	235736) 22500 5704 Date Trustee 43717) o Hac Vice) & JONES LLP Floor	ΓCY COURT	
	15		SOUTHERN	DISTRICT OF CA	ALIFORNIA	
	16 17	In re BORREGO CC HEALTH FOU		Case No. 22-0 Chapter 11 Cas Judge: Honora		
	<ol> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> </ol>	Debtor ar Possessio	nd Debtor in on.	POST-EFFEC THE LIQUID CO-LIQUIDA	ON BY AND AMONG TH CTIVE DATE DEBTOR, DATING TRUSTEE, THE ATING TRUSTEES AND CHYAN REGARDING 94	
	24					
	25					
	26					
	27 28					
		4906-1196-9283.1 10283	3.00003	Signed by	Judge Laura Stuart Taylor December	 11, 2024

DENTONS US LLP 601 South Figueroa STREET, Suite 2500 Los ANGELES, California 90017-5704 (213) 623-9300

## C&36 222 02 384-LT111 File 12/12//24/24 nt etc nt di 2/12//24/24 13/24:021:10053510 oc P153.51 Pg. 5 of 15 22

Borrego Community Health Foundation, the debtor and debtor in possession (prior to the effective date of the Plan (defined below), the "<u>Debtor</u>," and after the effective date, the "<u>Post-Effective Date Debtor</u>") in the above-captioned chapter 11 bankruptcy case, the Liquidating Trustee (the "<u>Liquidating Trustee</u>") of the Borrego Community Health Foundation Liquidating Trust (the "<u>Liquidating Trust</u>"), the Co-Liquidating Trustees of the Liquidating Trust (the "<u>Co-Liquidating Trustees</u>") and Suren Chtchyan (the "<u>Claimant</u>", and collectively with the Post-Effective Date Debtor, the Liquidating Trustee, and the Co-Liquidating Trustees, the "<u>Parties</u>") hereby enter into this *Stipulation By and Among the Post-Effective Date Debtor, the Liquidating Trustee, the Co-Liquidating Trustees and Suren Chtchyan Regarding Claim No. 94*.

### **RECITALS**

WHEREAS, on September 12, 2022, the Debtor filed a voluntary petition for
relief under chapter 11 of title 11 of the United States Code commencing Case No.
22-02384 (the "<u>Chapter 11 Case</u>") in the United States Bankruptcy Court for the
Southern District of California;

WHEREAS, on or about November 14, 2022, Claimant filed Proof of Claim
No. 94 in the amount of \$224,819.00 ("<u>Claim 94</u>"), a copy of which is attached
hereto as Exhibit A;

WHEREAS, the Liquidating Trust was established pursuant to the *First Amended Joint Combined Disclosure Statement and Chapter 11 Plan of Liquidation of Borrego Community Health Foundation* [Docket No. 1168] (the "<u>Plan</u>"), confirmed by the order [Docket No. 1273] entered January 25, 2024 (the "<u>Confirmation Order</u>"), and that certain *Liquidating Trust Agreement*, dated as of

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February 14, 2024 (the "Liquidating Trust Agreement");

WHEREAS, the Post-Effective Date Debtor has reviewed its books and records and believes that Claim 94 relates to dental services performed by the Claimant on behalf of the Debtor; and

WHEREAS, after the Post-Effective Date Debtor's professionals reviewed Claim 94, the Parties have agreed to resolve any issues regarding Claim 94 as set forth herein.

### **STIPULATION**

**NOW THEREFORE,** subject to the approval of the Court, the Parties hereby agree and stipulate as follows:

1. Claim 94 shall be reduced and allowed as a general unsecured claim in the amount of \$110,000.00 (the "<u>Allowed Claim Amount</u>").

2. Within thirty (30) days of entry of the order approving this Stipulation, the Liquidating Trust shall pay the Allowed Claim Amount to Claimant pursuant to the Plan.

3. In consideration of the agreements with and value provided herein and 16 other good and valuable consideration, the Parties hereby waive, remise, release 17 and forever discharge the other, including each of their respective former and 18 current predecessors, successors, assigns, affiliates, subsidiaries, parent companies, 19 shareholders, partners, members, managers, investors directors, officers, 20 accountants, attorneys, employees, agents, representatives and servants of, from and 21 against any and all claims, actions, causes of action, suits, proceedings, defenses, 22 counterclaims, contracts, judgments, damages, accounts, reckonings, executions, 23 and liabilities whatsoever of every name and nature, whether known or unknown, 24 whether or not well-founded in fact or in law, and whether in law, at equity or 25 otherwise, which either Party ever had or now has for or by reason of any matter, 26 cause or anything whatsoever to this date relating to or arising out of the Parties' 27 prior business relationship, or the Chapter 11 Case. 28

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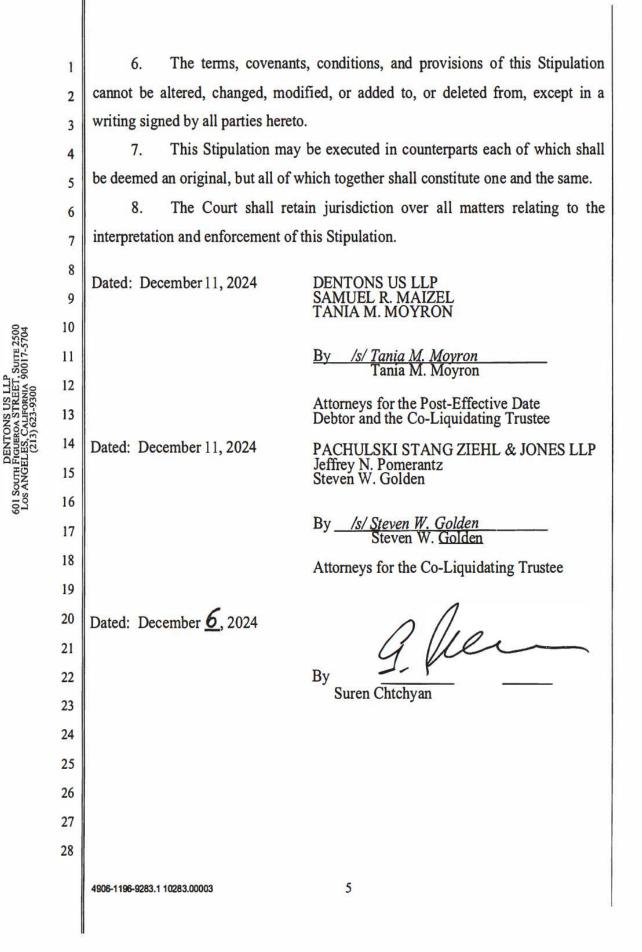
## C&36 22 02 384-LT111 File 12 1121/24/24 nt effent di 22/01 122/12/24:021:10053510 0 P0 54 5 Pg. 7 of 15 22

4. Each of the Parties to the Stipulation acknowledge that they are familiar with California Civil Code Section 1542 and with respect to the matters released herein, each Party expressly waives any and all rights under California Civil Code Section 1542 and under any other federal or state statute or law of similar effect. California Civil Code Section 1542 provides:

A general release does not extend to claims that the creditor or releasing party does not know or suspect to exist in his or her favor at the time of executing the release and that, if known by him or her, would have materially affected his or her settlement with the debtor or released party.

5. Claimant hereby warrants that Claimant (a) is authorized and empowered to execute this Stipulation on behalf of the Claimant, (b) has read this Stipulation in its entirety and fully understands and accepts the terms set forth herein, (c) has had an opportunity to consult with legal counsel and any other advisors of Claimant's choice with respect to the terms of this Stipulation, and (d) is signing this Stipulation on Claimant's own free will.

[Remainder of Page Intentionally Left Blank]



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# **EXHIBIT A**

#### Casse 22-023844L[T11 Filedd/12/24/2Enteredte2/dd/22/13/24021: 100:51510DoEg15165 Pg. 10 15 of 22 Claim #94 Date Filed: 11/14/2022

Fill in this info	ormation to identify the case:	
Debtor	Borrego Community Health Foundation	
United States Ba	ankruptcy Court for the: Southern District of Cal	ifornia <sup>State)</sup>
Case number	22-02384	

### Official Form 410 Proof of Claim

04/22

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies or any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

P	art 1: Identify the Clai	m	
1.	Who is the current creditor?	Suren Chtchyan Name of the current creditor (the person or entity to be paid for this clain Other names the creditor used with the debtor	n)
2.	Has this claim been acquired from someone else?	No     Yes. From whom?	
3.	Where should notices and payments to the creditor be sent? Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	Where should notices to the creditor be sent?         Suren Chtchyan         3727 W. Sunset Blvd         Los Angeles, CA 90026         Contact phone       3236659693         Contact email       schtchyan@hotmail.com         Uniform claim identifier for electronic payments in chapter 13 (if you use	Where should payments to the creditor be sent? (if different)         Contact phone         Contact email         cone):
4.	Does this claim amend one already filed?	No Yes. Claim number on court claims registry (if known)	Filed on
5.	Do you know if anyone else has filed a proof of claim for this claim?	<ul> <li>No</li> <li>Yes. Who made the earlier filing?</li> </ul>	

Proof of Claim



## Case 22-023844L[[111 Filedd/12/24/2Enteredte2/6d/22/13/24021:100:53510DoPg18105 Pg. 11 15 of 22

Part 2	: Give Information Ab	out the Claim as of the Date the Case Was Filed
γοι	you have any number u use to identify the btor?	No Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor:
7. Ho	w much is the claim?	<ul> <li>\$ 224819.00</li> <li>Does this amount include interest or other charges?</li> <li>No</li> <li>Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).</li> </ul>
	nat is the basis of the im?	Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card. Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c). Limit disclosing information that is entitled to privacy, such as health care information.
	all or part of the claim cured?	✓ No         ✓ Yes. The claim is secured by a lien on property.         Nature or property:                  Real estate: If the claim is secured by the debtor's principle residence, file a Montgage Proof of Claim Attachment (Official Form 410-A) with this Proof of Claim.            Motor vehicle         Other. Describe:         Basis for perfection:         Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)         Value of property:       \$
	this claim based on a se?	<ul> <li>No</li> <li>Yes. Amount necessary to cure any default as of the date of the petition.</li> </ul>
	this claim subject to a ht of setoff?	<ul> <li>No</li> <li>Yes. Identify the property:</li></ul>



### Casse 22-023844L[[111 Fileded/12/24/2Enteredte2/ed/22/13/244021:100:53510DoPg19165 Pg. 12 15 of 22

12. Is all or part of the claim	🖌 No		
entitled to priority under 11 U.S.C. § 507(a)?	Yes. C	heck all that apply:	Amount entitled to priority
A claim may be partly priority and partly		pmestic support obligations (including alimony and child support) under I U.S.C. § $507(a)(1)(A)$ or $(a)(1)(B)$ .	\$
nonpriority. For example, in some categories, the law limits the amount		p to \$3,350* of deposits toward purchase, lease, or rental of property services for personal, family, or household use. 11 U.S.C. § 507(a)(7).	\$
entitled to priority.	da	ages, salaries, or commissions (up to \$15,150*) earned within 180 ays before the bankruptcy petition is filed or the debtor's business ends, hichever is earlier. 11 U.S.C. § 507(a)(4).	\$
	Ta	axes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).	\$
	Co	ontributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).	\$
		ther. Specify subsection of 11 U.S.C. § 507(a)() that applies.	\$
	* Amou	unts are subject to adjustment on 4/01/25 and every 3 years after that for cases begun	on or after the date of adjustment.
13. Is all or part of the claim	🖌 No		
pursuant to 11 U.S.C. § 503(b)(9)?	days b	ndicate the amount of your claim arising from the value of any goods rece efore the date of commencement of the above case, in which the goods linary course of such Debtor's business. Attach documentation supportin	have been sold to the Debtor in
	\$		
Part 3: Sign Below			
The person completing	heck the app	propriate box:	

The person completing	Check the approp	riate box:			
this proof of claim must sign and date it. FRBP 9011(b).	I am the crea	ditor.			
If you file this claim	I am the crea	ditor's attorney or authorized a	igent.		
electronically, FRBP 5005(a)(2) authorizes courts	I am the trus	tee, or the debtor, or their aut	horized agent. Bankruptcy	Rule 3004.	
to establish local rules specifying what a signature	I am a guara	ntor, surety, endorser, or othe	er codebtor. Bankruptcy Ri	ule 3005.	
is. A person who files a				s an acknowledgement that when calculating ents received toward the debt.	
fraudulent claim could be fined up to \$500,000,	I have examined t	the information in this Proof of	Claim and have reasonab	ole belief that the information is true and correct	t.
imprisoned for up to 5 years, or both.	I declare under pe	enalty of perjury that the foreg	oing is true and correct.		
18 U.S.C. §§ 152, 157, and 3571.	Executed on date	<u>11/15/2022</u> MM / DD / YYYY			
	<u>/s/SUREN_CH1</u> Signature Print the name o	CHYAN	ting and signing this clai		
	Name	SUREN CHTCHYAN			
		First name	Middle name	Last name	
	Title	OWNER/DENTIST			
	Company	SUREN CHTCHYAN DDS Identify the corporate servicer as	the company if the authorized	agent is a servicer.	
	Address				
	Contact phone			Email	
		-			



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For phone assistance: Domestic (866) 967-0670 | International (310) 751-2670

Debtor:	
22-02384 - Borrego Community Health Four	ndation
District:	
Southern District of California, San Diego Di	vision
Creditor:	Has Supporting Documentation:
Suren Chtchyan	Yes, supporting documentation successfully uploaded
3727 W. Sunset Blvd	Related Document Statement:
Los Angeles, CA, 90026	Has Related Claim:
Phone:	No
3236659693	Related Claim Filed By:
Phone 2:	Filing Party:
3237918049	Creditor
Fax:	
Email:	
schtchyan@hotmail.com Other Names Used with Debtor:	Amends Claim:
Other Names Osed with Debtor.	No
	Acquired Claim:
	No
Basis of Claim:	Last 4 Digits: Uniform Claim Identifier:
Services Performed	No
Total Amount of Claim:	Includes Interest or Charges:
224819.00	No
Has Priority Claim:	Priority Under:
No	
Has Secured Claim:	Nature of Secured Amount:
No	Value of Property:
Amount of 503(b)(9):	Annual Interest Rate:
No	
Based on Lease:	Arrearage Amount:
No	Basis for Perfection:
Subject to Right of Setoff:	Amount Unsecured:
No	
Submitted By:	
SUREN CHTCHYAN on 15-Nov-2022 1:52:0	03 a.m. Eastern Time
Title:	
OWNER/DENTIST	
Company:	
SUREN CHTCHYAN DDS	

# Supporting Documentation Redacted (on file with KCC)

# Additional Supporting Documents Received on 11/18/2022

RECEIVED

NOV 1 8 2022

KURTZHAN CARSON CONSULTANTS



#### C @ sec 222-02384-4 T111 File the the the tail / 24/24 / 24 mt effect date to the tail / 24/24 / 251: 100535151 Doc P g. 5135 Pg. 16 of 150 f 22

Your claim can be filed electronically on KCC's website at https://epoc.kccllc.net/BorregoHealth.

ID: 25777721

PIN: 9vvyRmgF

Fill in this in	formation to identify the case:
Debtor	Borrego Community Health Foundation
United States B	ankruptcy Court for the Southern District of California
Case number	22-02384

The Debtor has listed your claim as Disputed on Schedule F (E/F, Part 2) as a General Unsecured claim. If you believe that you have a claim against the Debtor, please complete and return this form accordingly.

### Official Form 410 Proof of Claim

04/22

Signed by Judge Laura Stuart Taylor December 11, 2024

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Other than a claim under 11 U.S.C. § 503(b)(9), this form should not be used to make a claim for an administrative expense arising after the commencement of the case.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies or any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed.

1.	Who is the current creditor?	Suren Chtchyan Name of the current creditor (the person or entity to be paid for the	his claim)		
		Other names the creditor used with the debtor			
2. Has this claim been acquired from	K No				
	someone else?	Yes. From whom?			
3.	Where should	Where should notices to the creditor be sent?		payments to the credito	r be sent? (if
	notices and payments to the	Suren Chtchyan	different)		
	creditor be sent?	3727 W. Sunset Blvd Los Angeles, CA 90026	Name		
	Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)		Number Stre	et	
	(		City	State	ZIP Cod
	RECEIVEN	Address	Country		
		Contact phone 3236659693	-		_
	NOV 1 8 2022	Contact email SCHTCHYAN DHOTMAIL	Contact email		-
ZN	AN CARSON CONSULTANTS	Uniform claim identifier for electronic payments in chapter 13 (if y	· ·		
4.	Does this claim	DY No			
	amend one already filed?	Yes. Claim number on court claims registry (if kn	nown)	Filed on	D / YYYY
5.		No No			
	anyone else has filed a proof of claim for this claim?	Yes. Who made the earlier filing?			
		······································	······································		

Part 2: Give Information Ab	pout the Claim as of the Date the Case Was Filed
Do you have any number you use to identify the debtor?	No Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor:
7. How much is the claim?	s 224819.00 Does this amount include interest or other charges?
	Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).
3. What is the basis of the claim?	Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card. Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c). Limit disclosing information that is entitled to privacy, such as health care information.
	SERVICES PERFORMED (PAtients treatment)
9. Is all or part of the claim secured?	Yes. The claim is secured by a lien on property. Nature of property:
	Real estate: If the claim is secured by the debtor's principal residence, file a <i>Mortgage Proof of Claim Attachment</i> (Official Form 410-A) with this <i>Proof of Claim</i> .
	Motor vehicle         Other. Describe:
	Basis for perfection: Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)
	Value of property: \$
	Amount of the claim that is secured: \$
	Amount of the claim that is unsecured: \$(The sum of the secured and unsecured amount should match the amount in line 7.)
RECEIVED	Amount necessary to cure any default as of the date of the petition: \$
NOV 1 8 2022	Annual Interest Rate (when case was filed)%
KURTZMEN CARSON CRESSED	<b>—</b> • • • • • • • • • • • • • • • • • • •
10. Is this claim based on a lease?	No Yes. Amount necessary to cure any default as of the date of the petition.
1. Is this claim subject to a right of setoff?	No Yes. Identify the property:
Official Form 410	Proof of Claim page 2 2202384221019011833000373
	Signed by Judge Laura Stuart Taylor December 11, 202

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	of 130f 22	
12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?	No Yes. Check all that apply:	Amount entitled to priority
A claim may be partly priority and partly nonpriority. For example,	Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).	\$
in some categories, the law limits the amount	Up to \$3,350* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).	\$
entitled to priority.	Wages, salaries, or commissions (up to \$15,150*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).	\$
	Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).	\$
	Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).	\$
	Other. Specify subsection of 11 U.S.C. § 507(a)() that applies.	\$
	* Amounts are subject to adjustment on 4/01/25 and every 3 years after that for cases begun	on or after the date of adjustment.
13. Is all or part of the claim	No	,
pursuant to 11 U.S.C. § 503(b)(9)?	Yes. Indicate the amount of your claim arising from the value of any goods received and the date of commencement of the above case, in which the goods have the ordinary course of such Debtor's business. Attach documentation supporting	nave been sold to the Debtor in
	\$	
this proof of claim must sign and date it. FRBP 9011(b). If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is. A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.	<ul> <li>I am the creditor.</li> <li>I am the creditor's attorney or authorized agent.</li> <li>I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.</li> <li>I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.</li> <li>I understand that an authorized signature on this <i>Proof of Claim</i> serves as an acknowledg the amount of the claim, the creditor gave the debtor credit for any payments received tow.</li> <li>I have examined the information in this <i>Proof of Claim</i> and have reasonable belief that the I declare under penalty of perjury that the foregoing is true and correct.</li> </ul>	vard the debt.
	SUREN CHICAYAN ILL	
	Signature Print the name of the person who is completing and signing this claim:	
	Signature Signature State of the person who is completing and signing this claim:	TCHYAN
	Signature     US       Print the name of the person who is completing and signing this claim:       Name       Suber       First name       Middle name       Last name	TCHYAN
DCPENNED	Signature Print the name of the person who is completing and signing this claim: Name SUREA First name Middle name Last na ONVALED	ame
RECEIVED	Signature       Support         Print the name of the person who is completing and signing this claim:         Name       Support         First name       Middle name         Title       OWNER / DENTIST         Company       Identify the corporate servicer as the company if the authorized agent is a servicer.	ame S
RECEIVED NOV 1 8 2022	Signature       Print the name of the person who is completing and signing this claim:       Name     SUREN       First name     Middle name       Title     OWNER       Company     SUREN	ame S

Official Form 410

Proof of Claim page 3 2202224221010011922000272

### Case 22-02384-LT11 Filed 12/11/24 Entered 12/13/24 21:10:53 Doc 1515 Pg. 19

of 22

United States Bankruptcy Court

Southern District of California

In re:

BORREGO COMMUNITY HEALTH FOUNDATION.

Debtor

District/off: 0974-3

### **CERTIFICATE OF NOTICE**

Date Rcvd: Dec 11, 2024

User: Admin. Form ID: pdfO1

Page 1 of 4 Total Noticed: 2

Case No. 22-02384-LT

Chapter 11

The following symbols are used throughout this certificate: Definition

Symbol

+

Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Dec 13, 2024:

<b>Recip ID</b>	Recipient Name and Address
db	BORREGO COMMUNITY HEALTH FOUNDATION,, 587 Palm Canyon Dr., Suite 208, Borrego Springs, CA 92004
aty	+ Samuel Ruven Maizel, Dentons US LLP, 601 South Figueroa Street, Suite 2500, Los Angeles, CA 90017-5709

TOTAL: 2

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center. Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI). NONE

### BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, \*duplicate of an address listed above, \*P duplicate of a preferred address, or ## out of date forwarding orders with USPS. NONE

### NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Dec 13, 2024

Signature:

/s/Gustava Winters

### **CM/ECF NOTICE OF ELECTRONIC FILING**

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on December 11, 2024 at the address(es) listed below: Name **Email Address** Ali Mojdehi on behalf of Creditor Premier Healthcare Management Inc. amojdehi@btlaw.com, jgertz@btlaw.com;arego@btlaw.com;melissa.turpin@btlaw.com;docketinglitin@btlaw.com Ali Mojdehi on behalf of Creditor Promenade Square LLC amojdehi@btlaw.com, jgertz@btlaw.com;arego@btlaw.com;melissa.turpin@btlaw.com;docketinglitin@btlaw.com Ali Mojdehi on behalf of Creditor DRP Holdings LLC amojdehi@btlaw.com, jgertz@btlaw.com;arego@btlaw.com;melissa.turpin@btlaw.com;docketinglitin@btlaw.com Ali Mojdehi on behalf of Creditor Inland Valley Investments LLC amojdehi@btlaw.com, jgertz@btlaw.com;arego@btlaw.com;melissa.turpin@btlaw.com;docketinglitin@btlaw.com

### Case 22-02384-LT11 Filed 12/11/24 Entered 12/13/24 21:10:53 Doc 1515 Pg. 20 of 22

	of 22	3	
District/off: 0974-3 Date Rcvd: Dec 11, 2024	User: Admin. Form ID: pdfO1	Page 2 of 4 Total Noticed: 2	
Allison Rego	on behalf of Creditor Premier Healthcare Management Inc. arego@btlaw.com, melissa.turpin@btlaw.com,docketinglitin@btlaw.com		
Allison Rego	on behalf of Creditor Promenade Square LLC arego@btlaw.com, melissa.turpin@btlaw.com,docketinglitin@	btlaw.com	
Allison Rego	on behalf of Creditor DRP Holdings LLC arego@btlaw.com, melissa.turpin@btlaw.com,docketinglitin@btlaw.com		
Allison Rego	on behalf of Creditor Inland Valley Investments LLC arego@btlaw.com, melissa.turpin@btlaw.com,docketinglitin@btlaw.com		
Andrew B. Still	on behalf of Creditor California Physicians' Service dba Blue Shield of California astill@swlaw.com kcollins@swlaw.com		
Andrew B. Still	on behalf of Creditor Blue Shield of California Promise Health Plan astill@swlaw.com kcollins@swlaw.com		
Anthony Bisconti	on behalf of Interested Party San Ysidro Health tbisconti@bklwlaw.com 1193516420@filings.docketbird.com,docket@bklwlaw.com		
Anthony Dutra	on behalf of Creditor Desert AIDS Project dba DAP Health adutra@hansonbridgett.com SSingh@hansonbrid	dgett.com	
Anthony Dutra	on behalf of Creditor Philip D. Szold M.D., Inc. dba La Mesa Pediatrics adutra@hansonbridgett.com, SSingh@hansonbridgett.com		
Bernard M. Hansen	on behalf of Creditor Premier Healthcare Management Inc. bernardmhansen@sbcglobal.net		
Cheryl Skigin	on behalf of Creditor Ally Bank caskigin@earthlink.net ca.ecf@aislegaltrac.com		
Christine E. Baur	on behalf of Creditor Greenway Health LLC christine@baurbklaw.com, admin@baurbklaw.com		
Christine M. Fitzgerald	on behalf of Attorney Christine M. Fitzgerald cfitzgerald@littler.com maria@thersfirm.com;amy@thersfirm	.com	
Daren Brinkman	on behalf of Creditor Pourshirazi & Youssefi Dental Corporation firm@brinkmanlaw.com 7764052420@fili	ngs.docketbird.com	
Darin L. Wessel	on behalf of Defendant CALIFORNIA DEPARTMENT OF HEALTH CARE SERVICES by and through its Baass darin.wessel@doj.ca.gov	Director, Michelle	
Darin L. Wessel	on behalf of Creditor CALIFORNIA DEPARTMENT OF HEALTH CARE SERVICES by and through its E Baass darin.wessel@doj.ca.gov	Director, Michelle	
Dean T. Kirby, Jr.	on behalf of Creditor Ramona Crossings LLC dkirby@fsl.law, jwilson@fsl.law		
Elvina Rofael	on behalf of United States Trustee United States Trustee elvina.rofael@usdoj.gov Tiffany.L.Carroll@usdoj.gov;USTP.Region15@usdoj.gov		
Gerald N. Sims	on behalf of Creditor BETA Risk Management Authority jerrys@psdslaw.com bonniec@psdslaw.com		
Gerald N. Sims	on behalf of Creditor BETA Healthcare Group jerrys@psdslaw.com bonniec@psdslaw.com		
Hala Hammi	on behalf of Creditor James Wermers hala.hammi@fennelllaw.com wpf@ecf.courtdrive.com;samantha.larimer@fennelllaw.com;naomi.cwalinski@fennelllaw.com;office@fenne Bargmann@fennelllaw.com	elllaw.com;Brendan.	
Helen Yang	on behalf of Interested Party Inland Empire Health Plan helen.yang@squirepb.com helen-h-yang-8259@ecf.pacerpro.com;PHX_DCKT@squirepb.com		
Jeffrey Garfinkle	on behalf of Creditor McKesson Corporation on behalf of itself and certain corporate affiliates jgarfinkle@bulverstegen@buchalter.com;docket@buchalter.com	uchalter.com,	
Jeffrey Garfinkle	on behalf of Interested Party McKesson Corporation jgarfinkle@buchalter.com lverstegen@buchalter.com;docket@buchalter.com		

## Case 22-02384-LT11 Filed 12/11/24 Entered 12/13/24 21:10:53 Doc 1515 Pg. 21

0430 22 0200	of 22	1 9. 21	
District/off: 0974-3 Date Rcvd: Dec 11, 2024	User: Admin. Form ID: pdfO1	Page 3 of 4 Total Noticed: 2	
Jeffrey N. Pomerantz	on behalf of Attorney Pachulski Stang Ziehl & Jones LLP jpomerantz@pszjlaw.com scho@pszjlaw.com		
Jeffrey N. Pomerantz	on behalf of Other Prof. FTI Consulting Inc. jpomerantz@pszjlaw.com, scho@pszjlaw.com		
Jeffrey N. Pomerantz	on behalf of Creditor Committee Official Committee of Unsecured Creditors of Borrego Community Health Foundation jpomerantz@pszjlaw.com;tkapur@pszjlaw.com;sgolden@pszjlaw.com scho@pszjlaw.com		
Keith H. Rutman	on behalf of Creditor Waleed Stephen D.D.S. krutman@krutmanlaw.com		
Kelly Ann Mai Khanh Tran	on behalf of Creditor Anna Navarro kelly@smalllawcorp.com emma@smalllawcorp.com		
Kenneth K. Wang	on behalf of Defendant CALIFORNIA DEPARTMENT OF HEALTH CARE SERVICES by and through its Director, Michelle Baass Kenneth.Wang@doj.ca.gov, anthony.conklin@doj.ca.gov		
Kenneth K. Wang	on behalf of Creditor CALIFORNIA DEPARTMENT OF HEALTH CARE SERVICES by and through its Baass Kenneth.Wang@doj.ca.gov, anthony.conklin@doj.ca.gov	Director, Michelle	
Kirsten Martinez	on behalf of Creditor Wells Fargo Bank N.A., d/b/a/ Wells Fargo Auto kirsten.martinez@bonialpc.com, Notices.Bonial@ecf.courtdrive.com		
Leslie Gardner	on behalf of Creditor U.S. Department of Health and Human Services leslie.gardner2@usdoj.gov brenda.seyler@usdoj.gov;Efile.dkt.civ@usdoj.gov		
Leslie Gardner	on behalf of Creditor Internal Revenue Service leslie.gardner2@usdoj.gov brenda.seyler@usdoj.gov;Efile.d	kt.civ@usdoj.gov	
Michael B. Reynolds	on behalf of Creditor Blue Shield of California Promise Health Plan mreynolds@swlaw.com kcollins@swla	w.com	
Michael B. Reynolds	on behalf of Creditor California Physicians' Service dba Blue Shield of California mreynolds@swlaw.com kcollins@swlaw.com		
Michael I. Gottfried	on behalf of Creditor Tower Energy Group Inc. mgottfried@elkinskalt.com, rzur@elkinskalt.com,cavila@elkinskalt.com,1648609420@filings.docketbird.com		
Randye B. Soref	on behalf of Interested Party Family Health Centers of San Diego rsoref@polsinelli.com		
Shawn Christianson	Shawn Christianson on behalf of Creditor Oracle America Inc. SII to NetSuite, Inc. schristianson@buchalter.com, cmcintire@buchalter.com		
Steven W Golden	on behalf of Trustee Co-Liquidating Trustee sgolden@pszjlaw.com		
Steven W Golden	on behalf of Creditor Committee Official Committee of Unsecured Creditors of Borrego Community Health sgolden@pszjlaw.com	Foundation	
Susan C. Stevenson	on behalf of Creditor BETA Healthcare Group sstevenson@psdslaw.com bonniec@psdslaw.com		
Tania M. Moyron	on behalf of Debtor BORREGO COMMUNITY HEALTH FOUNDATION tania.moyron@dentons.com, derry.kalve@dentons.com;DOCKET.GENERAL.LIT.LOS@dentons.com		
Tania M. Moyron on behalf of Attorney Dentons US LLP tania.moyron@dentons.com derry.kalve@dentons.com;DOCKET.GENERAL.LIT.LOS@dentons.com			
Tania M. Moyron	`ania M. Moyron on behalf of Plaintiffs BORREGO COMMUNITY HEALTH FOUNDATION tania.moyron@dentons.com, derry.kalve@dentons.com;DOCKET.GENERAL.LIT.LOS@dentons.com		
Teddy Kapur	on behalf of Creditor Committee Official Committee of Unsecured Creditors of Borrego Community Health tkapur@pszjlaw.com;jpomerantz@pszjlaw.com;sgolden@pszjlaw.com	Foundation	
United States Trustee	ustp.region15@usdoj.gov		
Van C. Durrer, II	on behalf of Attorney Skadden Arps, Slate, Meagher & Flom LLP van.durrer@skadden.com, rebecca.ritchie@skadden.com;andrea.bates@skadden.com;brigitte.travaglini@skadden.com;van-durrer-797-	4@ecf.pacerpro.com	

## Case 22-02384-LT11 Filed 12/11/24 Entered 12/13/24 21:10:53 Doc 1515 Pg. 22 of 22

District/off: 0974-3 Date Rcvd: Dec 11, 2024 TOTAL: 52

User: Admin. Form ID: pdfO1

Page 4 of 4 Total Noticed: 2