UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION
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IN RE:	Chapter 11 Cases
TRAJECTOR HOLDINGS, LLC,[1]	Case No. 3:26-bk-03286-JAB Lead Case
	Jointly Administered with
BENEFITS GROUP HOLDINGS, LLC,	Case No. 3:26-bk-03289-JAB
TRAJECTOR MEDICAL, LLC,	Case No. 3:26-bk-03291-JAB
INFINITE IP LLC,	Case No. 3:26-bk-03293-JAB
PERFECT PATH, LLC,	Case No. 3:26-bk-03295-JAB
TRAJECTOR ADMIN SERVICES, LLC,	Case No. 3:26-bk-03296-JAB
BENEFITS INSURANCE, LLC,	Case No. 3:26-bk-03297-JAB
MYLER INSURANCE SERVICES HOLDINGS, LLC,	Case No. 3:26-bk-03298-JAB
ANCHORSIX SERVICES, LLC,	Case No. 3:26-bk-03299-JAB
ATVANTAGE, LLC,	Case No. 3:26-bk-03300-JAB
TRAJECTOR MEDIA SERVICES, LLC,	Case No. 3:26-bk-03301-JAB
GLOBALTEK BPO LLC,	Case No. 3:26-bk-03302-JAB
MYLER DISABILITY HOLDINGS, LLC,	Case No. 3:26-bk-03304-JAB
MYLER DISABILITY, LLC,	Case No. 3:26-bk-03306-JAB
ADDUCO MEDIA, LLC,	Case No. 3:26-bk-03307-JAB
TRAJECTOR DISABILITY, LLC,	Case No. 3:26-bk-03308-JAB
CONTACT CENTER 1, LLC,	Case No. 3:26-bk-03309-JAB
BENEFITS KARMA, LLC,	Case No. 3:26-bk-03310-JAB
EXECUTIVE STAFFING SOLUTIONS, PLLC,	Case No. 3:26-bk-03311-JAB
AMPRY HOLDINGS, LLC,	Case No. 3:26-bk-03312-JAB
CONCIERGE STAFFING SERVICE MANAGEMENT, LLC,	Case No. 3:26-bk-03314-JAB
TRAJECTOR, INC.,	Case No. 3:26-bk-03315-JAB
Debtors.	

PUTATIVE CLASS CLAIMANTS' *EXPEDITED* MOTION TO EXTEND AND/OR TOLL THE CLAIMS BAR DATE PENDING RESOLUTION OF CLASS-TREATMENT

[1] The Debtors' mailing address is 5950 NW 1st Place, Suite 200, Gainesville, FL 32607. The last four digits of each Debtor's federal tax identification number are: (i) Trajector Holdings, LLC (7528); (ii) Benefits Group Holdings, LLC (2029); (iii) Trajector Medical, LLC (5243); (iv) Infinite IP LLC (3723); (v) Perfect Path, LLC (3494); (vi) Trajector Admin Services, LLC (2231); (vii) Benefits Insurance, LLC (9835); (viii) Myler Insurance Services Holdings, LLC (3606); (ix) AnchorSix Services, LLC (5009); (x) Atvantage, LLC (7384); (xi) Trajector Media Services, LLC (7509); (xii) Globaltek BPO LLC (1684); (xiii) Myler Disability Holdings, LLC (9924); (xiv) Myler Disability, LLC (0845); (xv) Adduco Media, LLC (0257); (xvi) Trajector Disability, LLC (5136); (xvii) Contact Center 1, LLC (2329); (xviii) Benefits Karma, LLC (1850); (xix) Executive Staffing Solutions, PLLC (1841); (xx) Ampry Holdings, LLC (2323); (xxi) Concierge Staffing Service Management, LLC (2814); and (xxii) Trajector, Inc. (2128).

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Expedited Consideration Requested[2]

The Class Claimants respectfully request the Court consider this Motion on **September 29, 2026 at 3:00 p.m. (ET)** when other matters are scheduled to be heard in these cases. The Claims Bar Date is presently scheduled for October 1, 2026 and absent the relief requested herein, the Veteran Claimants may be forced to file their thousands or tens of thousands of individual claims prior to this Court's determination that individual proofs of claim are not required for members of the Putative Classes. Accordingly, the Class Claimants respectfully request that this Court consider this Motion prior to the Claims Bar Date.

Gilbert Quijada, Jr., Jeffrey Phillips, and Kimberly Phillips, individually and on behalf of all others similarly situated (the "**Class Claimants**"), by and through their undersigned counsel, hereby file this motion (this "**Motion**"), respectfully requesting that the Court, pursuant to Bankruptcy Rules 3003(c)(3) and 9006(b)(1), extend and/or toll the Claims Bar Date (as defined herein) for members of the Putative Classes (as defined herein) and with respect to claims encompassed by the Class Claims (as defined herein), pending resolution of the Rule 7023 Motion (as defined herein) and any subsequent request for class certification under Civil Rule 23. The Class Claimants further request that, if class treatment is denied in whole or in part, the Court establish a supplemental deadline for affected Veteran Benefit Claimants (as defined herein) to file individual proofs of claim.[3] In support of each of these requests for relief, the Class Claimants respectfully state as follows:

Background

1. On July 23, 2026 (the "**Petition Date**"), the Debtors commenced the above-captioned chapter 11 cases (the "**Chapter 11 Cases**") by filing voluntary petitions for relief under

[2] Capitalized terms used in this request shall have the meanings ascribed to such terms in this Motion.

[3] Prior to the filing of this Motion, the Class Claimants conferred with the counsel to the Official Committee of Unsecured Creditors, and it is the understanding of the Class Claimants that the Committee will seek an extension of the Claims Bar Date for all creditors. For the avoidance of doubt, the Class Claimants support such an extension and the relief requested in this Motion is intended to be in addition and supplemental to such relief.

chapter 11 of title 11 of the United States Code (the "**Bankruptcy Code**"). On July 28, 2026, the Court entered an order directing the joint administration of the Chapter 11 Cases under Case No. 3:26-bk-03286-JAB [Dkt. No. 63].

2. Prior to the Petition Date, the Debtors were engaged in the business of providing services to individuals seeking disability and related benefits from government agencies, including providing medical evidence development and documentation services to veterans pursuing disability benefits from the U.S. Department of Veterans Affairs.

3. As of the Petition Date, there were two class actions pending against certain of the Debtors in the United States District Court for the Northern District of Florida (Case Nos. 1:26-cv-00099 and 1:26-cv-00150), more fully described as follows:

a. On March 27, 2026, Christopher Baker, Randall Coates, Kerry Isner, Damon Oliver, and Warren Treadwell commenced a class action against Debtor Trajector Medical, LLC, formerly known as Vet Comp & Pen Medical Consulting, LLC, in the Circuit Court of the Eighth Judicial Circuit in and for Alachua County, Florida, on behalf of a proposed class of Florida-resident veterans. The action asserts a claim under the Florida Deceptive and Unfair Trade Practices Act predicated on alleged violations of federal law governing VA accreditation and fee restrictions and seeks, among other relief, actual damages, an order voiding outstanding contractual balances, injunctive relief, and attorneys' fees and costs. On April 28, 2026, Trajector Medical removed the action to the United States District Court for the Northern District of Florida, where it remains pending as *Christopher Baker, Randall Coates, Kerry Isner, Damon Oliver, and Warren Treadwell v. Trajector Medical, LLC (f/k/a Vet Comp & Pen Medical Consulting, LLC)*, Case No. 1:26-cv-00099, and is presently stayed by operation of the automatic stay imposed under section 362 of the Bankruptcy Code (the "**Baker Class Action**").

b. On April 9, 2026, the Class Claimants commenced a class action against Debtors Trajector, Inc. and Trajector Medical, LLC, formerly known as Vet Comp and Pen Medical Consulting, LLC, in the United States District Court for the Central District of California on behalf of proposed nationwide and California classes of veterans and eligible dependent spouses. On June 23, 2026, the action was transferred to the United States District Court for the Northern District of Florida, where it remains pending as *Gilbert Quijada, Jr., Jeffrey Phillips, and Kimberly Phillips v. Trajector, Inc. and Trajector Medical, LLC (f/k/a Vet Comp and Pen Medical Consulting, LLC)*, Case No. 1:26-cv-00150-MW-MJF, and is presently stayed by operation of the automatic stay imposed under section 362 of the Bankruptcy Code (the "**Quijada Class Action**," and together with the Baker Class Action, the "**Class Actions**").

4. On July 23, 2026, the Debtors filed their *Emergency Motion for an Order Establishing Certain Notice Procedures* [Dkt. No. 14]. On July 30, 2026, the Court entered the *Order Establishing Certain Notice Procedures* [Dkt. No. 81] (the "**Notice Procedures Order**").

5. On July 23, 2026, the Debtors filed their *Emergency Motion for Approval of Form of Notice of Commencement and Proof of Claim* [Dkt. No. 23]. On July 29, 2026, the Court entered the *Order Granting Motion for Approval of Form of Notice of Commencement and Proof of Claim* [Dkt. No. 72] (the "**Notice Form Order**"). Pursuant to the Notice Form Order, the Debtors filed the *Notice of Chapter 11 Bankruptcy Case* [Dkt. No. 90] (the "**Notice of Commencement**") and caused the Notice of Commencement and a Modified Official Form 410 Proof of Claim (the "**Proof of Claim Form**") to be served on parties in interest.

6. The deadline to file proofs of claim against the Debtors, as set forth in the Notice of Commencement, is currently scheduled for October 1, 2026 (the "**Claims Bar Date**").

7. On the date hereof, the Class Claimants are contemporaneously submitting twelve proofs of claim, six per defendant Debtor with two per Class Claimant, each on behalf of themselves and all members of their respective classes (the "**Class Claims**"). The Class Claimants are also contemporaneously filing the *Putative Class Claimants' Motion for the Application of Bankruptcy Rule 7023 and for Leave to File Class Proof of Claim* [Dkt. No. 234] (the "**Rule 7023 Motion**").[4] The Rule 7023 Motion requests that the Court apply Rule 7023 of the Federal Rules of Bankruptcy Procedure (the "**Bankruptcy Rules**" or "**Rules**") to the Class Claims and any contested matter concerning their allowance. The Rule 7023 Motion does not request that the Court presently determine whether the requirements for certification under Rule 23 of the Federal Rules of Civil Procedure (the "**Civil Rules**") have been satisfied. If the Rule 7023 Motion is granted, the Class Claimants anticipate filing a subsequent motion requesting certification under Civil Rule 23, as incorporated by Bankruptcy Rule 7023.

8. There is no realistic prospect that the Rule 7023 Motion will be resolved prior to the October 1, 2026 Claims Bar Date. Absent the requested relief, members of the Putative Class therefore are faced with a dilemma: file thousands or tens of thousands of individual proofs of claim before the Court determines whether individual filings are necessary, or refrain from doing so and risk the argument that their claims were extinguished while the Rule 7023 Motion remains pending.

9. Accordingly, in the interest of judicial economy and efficient estate administration, the Class Claimants file this Motion.

[4] For purposes of this Motion, the term "**Putative Classes**" has the same meaning assigned to that term in the Rule 7023 Motion, limited to those persons who hold claims against one or more of the Debtors arising from conduct occurring on or before the Petition Date and encompassed by the Class Claims.

Relief Requested

10. By this Motion, the Class Claimants respectfully request that the Court enter an order providing as follows:

a. That the Claims Bar Date be extended and/or tolled, as applicable, for all individuals residing in the United States who are veterans or dependents of veterans of any branch of the United States Armed Forces who possess a claim against the Debtors arising from or related to the conduct described in the Class Complaint, including but not limited to the members of the Putative Classes (collectively, the "**Veteran Benefit Claimants**"), pending resolution of the Rule 7023 Motion and any subsequent proceedings concerning certification under Civil Rule 23, as incorporated by Bankruptcy Rule 7023;

b. That if the Court enters an order that, in whole or in part, (i) denies the Rule 7023 Motion, (ii) denies a subsequent request for certification under Civil Rule 23, or (iii) otherwise determines that any claim of the Veteran Benefit Claimants may not proceed through the Class Claims or a certified class (each, a "**Class Treatment Denial Order**"), the affected Veteran Benefit Claimants shall have until forty-five days after service of such Class Treatment Denial Order to file individual proofs of claim with respect to their affected claims (the "**Supplemental Class Bar Date**"); and

c. That Veteran Benefit Claimants may, but are not required to file an individual proof of claim before the Claims Bar Date.

Argument

I. Bankruptcy Rules 3003(c)(3) and 9006(b)(1) Authorize the Requested Prospective Extension for Cause.

11. Bankruptcy Rule 3003(c)(3) governs the deadline for filing proofs of claim in a chapter 11 case. It provides that "[t]he court must set the time to file a proof of claim or interest and may, for cause, extend the time."[5] Bankruptcy Rule 9006(b)(1)(A) similarly provides that, when a request for an extension is made before the applicable period expires, the Court may, "at any time and for cause," extend the time to act.[6]

[5] Fed. R. Bankr. P. 3003(c)(3).
[6] Fed. R. Bankr. P. 9006(b)(1)(A).

12. Because this request is made before the Claims Bar Date, the Court's authority to grant the extension does not depend on whether the hearing on, or adjudication of, this Motion occurs before October 1, 2026. Bankruptcy Rule 9006(b)(1)(A) expressly permits the Court to grant a timely requested extension "at any time." In these Chapter 11 Cases, cause exists because the requested extension is tied to a discrete and objectively ascertainable set of proceedings, protects claims already asserted through the timely Class Claims, avoids needless protective filings, and causes no unfair surprise or cognizable prejudice to the Debtors or other creditors.

II. The Timely Class Actions, Class Claims, Rule 7023 Motion, and Confusing Notice Establish Cause to Preserve the Veteran Benefit Claimants' Claims Pending Resolution of Class Treatment.

13. The Eleventh Circuit has expressly held that class proofs of claim are valid in bankruptcy.[7] In reaching that conclusion, the court rejected the proposition that every potential class member must first file an individual proof of claim before class procedures may be considered, describing such a requirement as "illogical and contrary to important class action policy considerations."[8]

14. The relief requested by this Motion is also consistent with the well-established class-action tolling doctrine. In *American Pipe & Construction Co. v. Utah*, the Supreme Court held that commencement of a class action suspends the applicable limitations period for putative class members.[9] Courts applying this principle in bankruptcy have recognized that a class proof of claim operates on a conditional basis while the court determines whether class treatment will be allowed. In *Gentry v. Siegel*, for example, the Fourth Circuit explained that "putative class representatives can keep the class action process alive until the court decides the issue."[10] If class

[7] *In re Charter Co.*, 876 F.2d 866, 870–71 (11th Cir. 1989).
[8] *Id.* at 871.
[9] 414 U.S. 538, 553–54 (1974).
[10] 668 F.3d 83, 90 (4th Cir. 2012).

treatment is approved, that approval relates back to the class filing, while if class treatment is rejected, "the putative class members must be given time after the court's rejection to file individual proofs of claim."[11] The court therefore instructed that, following denial of class treatment, the bankruptcy court "should then establish a reasonable time within which the individual putative class members are allowed to file individual proofs of claim."[12]

15. In light of this uncontroversial authority, it is unsurprising that this Court in this Division has already employed the procedure requested here. In *In re Wildwood Villages, LLC*, this Court explained that an earlier order had protected the putative class members by providing that, if the class claim were disallowed or Bankruptcy Rule 7023 were not applied, the affected class members would have forty-five days from the denial order to file individual proofs of claim.[13]

16. Moreover, as explained in greater detail in the Rule 7023 Motion, the Cover Letters sent with the Notice of Commencement (as defined in the Rule 7023 Motion and attached thereto as Composite Exhibit B) to potential Veteran Benefit Claimants were likely confusing to many of the Debtors' present and former clients. Due process requires "notice reasonably calculated, under all the circumstances, to apprise [claimants] of the pendency of the action and afford them an opportunity to [file their claims]."[14] Where notice of a claims bar date is confusing in light of a cover sheet like the Cover Letters, bankruptcy courts have held that due process is not satisfied and claimants are not bound by the claims bar date.[15]

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[11] *Id.*
[12] *Id.* at 91; *accord In re American Reserve Corp.*, 840 F.2d 487, 493 (7th Cir. 1988); *see also Teta v. Chow (In re TWL Corp.)*, 712 F.3d 886, 899 (5th Cir. 2013).
[13] No. 3:20-bk-02569-RCT, 2021 Bankr. LEXIS 1188, at *14 (Bankr. M.D. Fla. May 4, 2021).
[14] *Mullane v. Cent. Hanover Bank & Tr. Co.*, 339 U.S. 306, 314 (1950).
[15] *In re Collier*, 307 B.R. 20, 27 (Bankr. D. Mass. 2004) (denying reconsideration of an order granting a late-filed claim, explaining that "the Claimants were aware of the pendency of the bankruptcy case and of the initial bar date established by the Court. However, the clarity of the original notice of bar date was vitiated by the Cover Sheet sent out by the Debtor . . . .").

17. Accordingly, the requisite cause exists to extend the Claims Bar Date as to the Veteran Benefit Claimants.

III. The Requested Extension Will Promote Efficient Estate Administration and Will Not Prejudice the Debtors or Other Creditors.

18. Extending the Claims Bar Date for the limited purpose requested will materially promote efficient estate administration. The potential universe of Veteran Benefit Claimants numbers in the thousands or tens of thousands. Without an extension, prudent claimants and their counsel may feel compelled to submit individual proofs of claim before October 1, 2026, even though the Class Claims already assert their common claims and the Court has not decided whether separate filings are required. Indeed, co-counsel to the undersigned already represent approximately 172 members of the Putative Classes. *See Verified Statement of Group of Veteran Benefit Claimants Pursuant to Federal Rule of Bankruptcy Procedure 2019* [Dkt. No. 233].

19. Processing thousands of individual proofs of claim would impose substantial burdens on the Debtors, their professionals, their claims and noticing agent, and the Court. The Debtors may be required to review, reconcile, and potentially object to large numbers of substantially overlapping claims. Many of those claims could become unnecessary if the Rule 7023 Motion is granted and a class is subsequently certified. The requested extension avoids that waste and preserves the ability to employ the most efficient claims-resolution procedure after the Court determines which procedure is appropriate.

20. The relatively modest size of many individual Veteran Benefit Claimants' claims further favors the requested relief. The Class Complaint (as defined in the Rule 7023 Motion and attached thereto as Exhibit A) alleges individual charges generally ranging from approximately $1,000 to $20,000, while estimating aggregate class-wide damages of between $5 million and $50 million or more. For many veterans and their spouses, the cost and complexity of retaining counsel

and filing and prosecuting an individual bankruptcy claim would be disproportionate to the amount at stake, particularly where the existing Class Claims already hold their place in line pending class treatment determinations.

21. On the other side of the ledger, the Debtors will suffer no unfair surprise. The Class Actions were filed before the Petition Date, certain Debtors were named defendants, and the Class Actions were transferred to the Northern District of Florida before the Petition Date. The Class Claimants have now filed the Class Claims and the Rule 7023 Motion before the Claims Bar Date and during the opening weeks of the Chapter 11 Cases. The Class Claims therefore give the Debtors timely and express notice that the Class Claimants intend to pursue these claims on a representative basis. Any future concern about the amount of the Class Claims or their effect on plan administration can be addressed through the ordinary claims-resolution and estimation procedures provided by the Bankruptcy Code.[16] There is no need to extinguish individual claims (or require thousands of protective filings) to permit the Debtors to formulate or pursue their chapter 11 strategy.

22. The requested extension also protects other creditors by eliminating uncertainty regarding whether absent Veteran Benefit Claimants may seek relief from the Claims Bar Date after class treatment is denied (in the unlikely event that it is). It replaces potentially numerous fact-specific late-claim motions with a single, uniform procedure established in advance. All affected claimants will receive the same deadline, the Debtors will know when individual filings must be completed, and the Court can address the claims in an orderly and consistent manner.

[16] *See, e.g.*, 11 U.S.C. § 502(c).

IV. Alternatively, the Court Should Confirm That the Timely Class Claims Preserve the Veteran Benefit Claimants' Claims and Establish a Reasonable Post-Denial Filing Period.

23. If the Court declines to enter the requested prospective extension under Bankruptcy Rules 3003(c)(3) and 9006(b)(1)(A), the Court should alternatively merely confirm that the timely Class Claims preserve the individual Putative Class members' claims pending resolution of the Rule 7023 Motion and any subsequent class-certification proceedings. At a minimum, if the Court denies the Rule 7023 Motion or a subsequent certification motion after the Claims Bar Date, the Court should establish a reasonable period in which affected Putative Class members may file individual proofs of claim. *Gentry* states that such claimants "must be given time" following rejection of class treatment,[17] and *Wildwood* confirms that forty-five days is an appropriate period in this Court.

Conclusion

24. Whether characterized as an extension, tolling, preservation through the timely Class Claims, or the establishment of a supplemental bar date, the governing principle is the same: the unresolved class-treatment issue should not extinguish the claims of absent Putative Class members before they are told that the timely Class Claims will not protect them and are given a reasonable opportunity to proceed individually.

25. The Class Claimants acted before the Claims Bar Date, filed the Class Claims, sought application of Bankruptcy Rule 7023 to the Class Claims, and requested this limited extension while the Chapter 11 Cases remain in their earliest stages. The Debtors have long been aware of the Class Actions and will suffer no unfair prejudice from preserving the claims pending a determination of the appropriate procedural vehicle. By contrast, denying the requested relief

[17] 668 F.3d at 90.

could either generate thousands of unnecessary protective claims or expose thousands of current and former veteran clients and their spouses to forfeiture while the Rule 7023 and certification questions remain unresolved. Neither outcome promotes the fair or efficient administration of these estates, and this Court should grant this Motion.

WHEREFORE, the Class Claimants respectfully request that the Court enter an order (i) extending and/or tolling the Claims Bar Date for the Veteran Benefit Claimants pending resolution of the Rule 7023 Motion and any subsequent proceedings concerning certification under Civil Rule 23; (ii) establishing a Supplemental Class Bar Date forty-five days after service of Court-approved notice of any Class Treatment Denial Order; and/or (iii) confirming that the Class Claims timely preserved the claims of the Veteran Benefit Claimants pending resolution of class treatment; and (iv) granting such other and further relief as is requested herein and the Court deems just and proper.

Dated: September 16, 2026

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I caused a true and correct copy of the foregoing materials to be served via CM/ECF to all parties registered to receive electronic notice thereby on September 16, 2026.

By: */s/ Joseph A. Pack*

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