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.	

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DEBTORS' LIMITED RESPONSE IN OPPOSITION TO PUTATIVE CLASS

[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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CLAIMANTS' REQUEST FOR JUDICIAL NOTICE

The above-captioned debtors and debtors-in-possession (collectively, the "Debtors"), submit this limited response in opposition (the "Response") to *Putative Class Claimants' Request for Judicial Notice* (the "Request for Judicial Notice") [Doc. No. 300] filed by Gilbert Quijada, Jr., Jeffrey Phillips, and Kimberly Phillips (collectively, the "Putative Class Claimants"). In support of the Response, the Debtors respectfully state as follows:

1. Putative Class Claimants ask the Court to take judicial notice of certain documents: (i) complaints filed in other courts;[2] (ii) dockets in other court cases;[3] (iii) orders in other court cases;[4] (iv) a motion for leave to amend filed in another court case;[5] (v) certificates of service filed in Debtors' Chapter 11 cases;[6] (vi) a claims register filed in Debtors' Chapter 11 cases;[7] (vii) a Better Business Bureau ("BBB") "alert" and customer complaints directed at Trajector Medical (collectively, the "BBB Alert/Complaints");[8] and (viii) a Registration Statement filed by Trajector, Inc. with the Securities and Exchange Commission (the "SEC").[9]

2. Rule 201 provides for judicial notice of facts "not subject to a reasonable dispute" because it "is generally known within the trial court's territorial jurisdiction" or "can be accurately and readily determined from sources whose accuracy cannot reasonably be questioned." Fed. R. Evid. 201(b).

3. Court Orders and Motion for Leave to Amend. While the fact of entry of orders by other courts and a court filing in another legal proceeding may be subject of judicial notice for the

[2] [Doc. 300, ¶ 2.a.1, 2.b.1, and 2.c.i.]
[3] [Doc. 300, ¶ 2.a.ii, 2.b.2]
[4] [Doc. 300, ¶ 2.c.ii-iv]
[5] [Doc. 300, ¶ 2.d.i]
[6] [Doc. 300, ¶ 2.e.i-xiii]
[7] [Doc. 300, ¶ 2.e.xiv]
[8] [Doc. 300, ¶ 2.f.i.1 and 2]
[9] [Doc. 300, ¶ 2.g]

acts they represent, the contents of those orders—including any findings of fact or conclusions of law in court orders—are not subject of judicial notice. *See Grayson v. Warden, Comm'r, Ala. Dept. of Corr*., 869 F.3d 1204, 1225 (11th Cir. 2017) ("even though a court may take judicial notice of a document filed in another court . . . to establish the fact of such litigation and related filings, a court cannot take judicial notice of factual findings of another court.") (quotation and additional citation omitted). As recently summarized in *Campo v. Granite Svcs. Int'l, Inc.*:

> As the Eleventh Circuit has explained, "[j]udicial notice of court records is ordinarily confined to determining what happened in the course of a proceeding — when a plaintiff filed a complaint, what claims were argued and adjudicated, and so on." *Kerruish v. Essex Holdings, Inc.*, 777 F. App'x 285, 293 (11th Cir. 2019). Moreover, "[i]n addressing whether a court properly takes judicial notice of the nature or substance of court filings and other legal documents, the Eleventh Circuit has distinguished between taking judicial notice of the fact that court records or court rulings *exist* versus taking judicial notice of the *truth* of matters stated within those court records or court rulings." *Auto Owners Ins. Co. v. Morris*, 191 F. Supp. 3d 1302, 1304 (N.D. Ala. 2016) (emphasis in original). Specifically, "a court may take judicial notice of a document filed in another court not for the truth of the matters asserted in the other litigation, but rather to establish the fact of such litigation and related filings." *Id.* (quoting *United States v. Jones*, 29 F.3d 1549, 1553 (11th Cir. 1994)). Consequently, "a court may take notice of another court's order only for the limited purpose of recognizing the 'judicial act' that the order represents or the subject matter of the litigation." *Id.* (quoting *Jones*, 29 F.3d at 1553).

584 F. Supp. 3d 1329, 1335 (N.D. Ga. 2022).

4. Dockets: The same rule applies to court dockets identified by Putative Class Claimants. *See Frison v. Wells Fargo Bank, N.A. (In re Frison),* No: 6:17-cv-1676-Orl-41, 2018 WL 8756436, at *1 n.1 (M.D. Fla. Sept. 28, 2018) (stating that a "court may take judicial notice of another court's docket entries and orders *for the limited purpose of recognizing the filings and judicial acts they represent*") (quotation omitted) (emphasis added).

5. Certificates of Service and Claims Register: It appears the above-stated rule is relaxed when it comes to documents in a court's own file. *See, e.g., NG Solutions, LLC v. Senturk*

(In re Senturk), 660 B.R. 726, 729 and n.2 (Bankr. M.D. Fla. 2024) (considering, as part of its summary judgment ruling, the debtor's schedules, initial and amended statements of financial affairs, and transcript from the debtor's Rule 2004 examination). Accordingly, Debtors do not object to the Court taking judicial notice of the Certificates of Service and Claims Register.

6. BBB Alert/Complaints: Regarding a Trajector Medical business profile and customer complaints, the BBB states: "BBB Business Profiles are provided solely to assist you in exercising your own best judgment. *BBB does **not** verify the accuracy of information provided by third parties, and does **not** guarantee the accuracy of any information in Business Profiles*." [Doc 300-25 at PDF pg. 50/436 (emphasis added)]. The BBB Alert/Complaints provide a business profile of Trajector Medical and includes customer complaints. *See* Request for Judicial Notice, Exhibit F-1.

7. Customer complaints of interactions with Trajector Medical purportedly written by clients or former clients are not facts which are "not subject to a reasonable dispute" because it "is generally known within the trial court's territorial jurisdiction" or "can be accurately and readily determined from sources whose accuracy cannot reasonably be questioned." Fed. R. Evid. 201(b). This is especially the case given that the BBB itself—the provider of the forum—explicitly states that it cannot verify or otherwise vouch for its business profile or customer complaints posted on its website. *See* [Doc 300-25 at PDF pg. 50/436]. For these reasons, the Court should not take judicial notice of the BBB Alert/Complaints. To the extent the Court takes any judicial notice, such notice should be limited to recognizing the fact that the business profile and customer complaints are located on the BBB website, not for the truth of the statements thereon.

8. SEC Form S-1 Registration Statement: While the reason Putative Class Claimants seek judicial notice of Trajector, Inc.'s Registration Statement is unclear—none of their pleadings

filed to date explain the purpose—it appears that they seek to publish Trajector Medical's (and the other Debtors') business model. This apparently is in an effort to go to the purported merits of the Putative Class Claims. The purported merits of the Putative Class Claims is irrelevant to whether the Court should or should not apply Bankruptcy Rule 7023 to the Putative Class Claims. Moreover, the Debtors have not objected to the Putative Class Claims.

9. The Eleventh Circuit has consistently refused to take judicial notice of irrelevant facts. *See, e.g., Vallot v. Cent. Gulf Lines, Inc.*, 641 F.2d 347, 351 (5th Cir. 1981) ("Although [statute] requires the contents of the Federal Register be judicially noticed, [a party] cannot demand admission of the publications as evidence in cases such as this one where they have no relevance."); *Philippeaux v. Miami Apartments Invs., LLC*, No. 22-11692, 2023 WL 2989831, at *2 n.1 (11th Cir. Apr. 18, 2023) (denying motion for judicial notice "because the documents at issue are not relevant to this appeal"); *Berber v. Wells Fargo, NA*, 798 F. App'x 476, 483 n.7 (11th Cir. 2020) (denying motion for judicial notice of settlement as irrelevant, where settlement would not change court's evaluations of claims); *United States v. Alindor*, 799 F. App'x 678, 684 (11th Cir. 2020) ("The district court was within its discretion to refuse to take judicial notice of facts that are not relevant to the issues in the case.").

10. While the Court can take judicial notice of Trajector, Inc.'s Registration Statement, such notice cannot be for the truth of its contents, but rather the simply the existence of the filing. *See Bryant v. Avado Brands, Inc.,* 187 F.3d 1271, 1277-78 (11th Cir. 1999) (holding that a court may take judicial notice of relevant public documents required to be filed and actually filed with the SEC at the motion to dismiss stage for the statements in them, "not to prove the truth of the documents' contents"); *Wang v. Zymergen, Inc.,* 744 F. Supp. 3d 995, 1006 (N.D. Cal. 2024)

(taking judicial notice of documents filed with the SEC but clarifying that such notice "is limited to the existence of these filings and does not extend to the accuracy of their contents.").

Conclusion

Based on the foregoing, the Court should deny the Request for Judicial Notice to the extent it seeks judicial notice of BBB Alert/Complaints. The Court should also not take judicial notice of irrelevant filings that do not bear on the Rule 7023 Motion before the Court, such as Trajector, Inc.'s Registration Statement and rulings and filings in other cases not involving Trajector. To the extent the Court takes any judicial notice, it must be limited to the existence of the filing or document, not to the accuracy or the truth of the content of those documents, specifically including any findings of fact or conclusions of law in the cited court orders. Finally, Debtors do not object to the Court taking judicial notice of the Certificates of Service or the Claims Register in the record of this Court in Debtors' Chapter 11 cases.

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Dated: October 13, 2026

BERGER SINGERMAN LLP

101 E. Kennedy Boulevard, Suite 1165
Tampa, FL 33602
Tel. (813) 498-3400
Fax (813) 527-3705

By: */s/ Edward J. Peterson*
Edward J. Peterson
Florida Bar No. 0014612
epeterson@bergersingerman.com

and

Jordi Guso
Florida Bar No. 863580
jguso@bergersingerman.com
Clay B. Roberts
Florida Bar No. 116058
croberts@bergersingerman.com
1450 Brickell Avenue, Ste. 1900
Miami, FL 33131
Telephone: (305) 755-9500
Facsimile: (305) 714-4340

Counsel for the Debtors and Debtors-in-Possession