

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>In re:</b>  <b>NEIGHBORS LEGACY HOLDINGS, INC., et al.,</b>  <p style="text-align: center;"><b>Debtors.</b></p>	§ § § § § § §	<b>Chapter 11</b>  <b>Case No. 18-33836</b>  <b>(Jointly Administered)</b>
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**CERTIFICATE 1) OF NO OBJECTION TO THE  
LIQUIDATING TRUSTEE’S OBJECTION TO SONO CARE OF EAST  
TEXAS LLC’S CLAIM NO. 116 AND 2) OF COUNSEL REGARDING THE ORDER  
RESTRICTING ACCESS TO SONO CARE OF EAST TEXAS LLC’S CLAIM 116  
(Relates Doc. Nos. 993 and 1000)**

1. On October 14, 2019, the Tensie Axton, Trustee (the “Liquidating Trustee”) of the Liquidating Trust of Neighbors Legacy Holdings, Inc. and certain of its affiliates and subsidiaries filed her *Objection to Sono Care of East Texas LLC’s Claim No. 116 and Emergency Motion to Restrict Public Access to Sono Care of East Texas LLC’s Claim No. 116* [Docket No. 993] (the “Motion”).<sup>1</sup> Responses to the Motion were due November 13, 2019 (the “Objection Deadline”).

2. In accordance with paragraph 35 of the Procedures for Complex Chapter 11 Cases, the undersigned hereby certifies that more than twenty-four (24) hours have passed since the Objection Deadline and the Debtors have not received any answer, response, objection or responsive pleading with respect to the Motion. Additionally, no answer, response, objection or responsive pleading has been filed on the Court’s Docket.

3. Additionally, on October 15, 2019, the Court entered its *Order Restricting Access to Sono Care of East Texas LLC’s Claim 116* (the “Order”) [Docket No. 1000]. The Order required Sono Care to file “an amended, properly redacted, proof of claim” by October 31, 2019.

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<sup>1</sup> All terms not specifically defined in this Order shall be defined by the Motion.



4. Sono Care has failed to file an amended claim.<sup>2</sup> The Liquidating Trustee respectfully requests that the Court enter the attached Proposed Order (**Exhibit B**) disallowing Sono Care's Claim 116 as a priority claim and reclassifying it as an alleged general unsecured claim.

Dated: Houston, Texas  
November 15, 2019.

**PORTER HEDGES LLP**

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**COUNSEL FOR TENSIE AXTON,  
LIQUIDATING TRUSTEE OF THE NLH  
LIQUIDATING TRUST**

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<sup>2</sup> Although the Liquidating Trustee's counsel received the attached letter (**Exhibit A**) from Sono Care, the letter includes the same unredacted invoices as are attached to Sono Care's Claim.

**EXHIBIT A**

**SONO CARE LETTER**



October 31, 2019

Dear United states Bankruptcy Court,

In regard to Neighbors legacy holdings inc. chapter 11 Case No. 18-33836. Sono Care of east Texas as of October 1, 2015 had a binding contract with neighbors ER which requires a 30 day notice. I was notified on October 23, of Neighbors closing. Enclosed is the binding contract with Neighbors.

Sono care of East Texas provided coverage for ALL emergency ultrasounds till the day they closed. There are 7 patients I have not received payment for services rendered and nor have I received call pay for the month of October through 11/23/17 per the binding contract.

Sono care in good faith provided top notch ultrasound coverage. Payment for services rendered is demanded at this time!

Julie Wood ARDMS RVT

Owner of Sono Care of East Texas llc

**EXHIBIT B**

**PROPOSED ORDER**

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

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In re:

NEIGHBORS LEGACY HOLDINGS, INC.,  
*et al.*,

Debtors.

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Chapter 11

Case No. 18-33836

(Jointly Administered)

**ORDER SUSTAINING LIQUIDATING TRUSTEE'S  
OBJECTION TO SONO CARE OF EAST TEXAS LLC'S CLAIM NO. 116**

Upon consideration of the *Liquidating Trustee's Objection to Sono Care of East Texas LLC's Claim No. 116* (the "Objection"),<sup>1</sup> the Court concludes that good cause exists to sustain the Liquidating Trustee's Objection.

It is therefore **ORDERED** that Sono Care's Claim 116 is disallowed as a priority claim and reclassified as a general unsecured claim.

**SIGNED:**

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**MARVIN ISGUR**  
**UNITED STATES BANKRUPTCY JUDGE**

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<sup>1</sup> All terms not specifically defined herein shall be defined by the Objection.