

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

In re:

NEIGHBORS LEGACY HOLDINGS, INC.,  
*et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 18-33836 (MI)

Jointly Administered

**CERTIFICATE OF NO OBJECTION TO UNSECURED CREDITOR TRUSTEE'S  
FIFTH OMNIBUS OBJECTION TO CLAIMS PURSUANT TO SECTION 502(B) OF  
THE BANKRUPTCY CODE AND RULE 3007 OF THE FEDERAL RULES OF  
BANKRUPTCY PROCEDURE SEEKING TO DISALLOW CERTAIN CLAIMS**

Cole Schotz PC ("Cole Schotz"), as counsel to Mark Shapiro, Unsecured Creditor Trustee of the Unsecured Creditor Trust, hereby certify as follows:

1. On September 30, 2020, the *Fifth Omnibus Objection to Claims Pursuant to Section 502(b) of the Bankruptcy Code and Rule 3007 of the Federal Rules of Bankruptcy Procedure Seeking to Disallow Certain Claims (Duplicate Claims)* (the "Motion") [Docket No. 1140] was filed with the Court.

2. Objections, if any, to the Motion were required to have been filed with the Court and served by no later than October 30, 2020 (the "Objection Deadline").

3. The Objection Deadline has passed and no objections to the Motion appear on the docket or were served upon the undersigned counsel. Accordingly, the form of Proposed Order

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<sup>1</sup> Due to the large number of Debtors in these chapter 11 cases, a complete list of the Debtors and the last four digits of their tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' proposed claims and noticing agent at [www.kccllc.net/neighbors](http://www.kccllc.net/neighbors). The location of Debtors' principal place of business and the Debtors' service address is: 10800 Richmond Avenue, Houston, Texas 77042.



approving the Motion, which was submitted with the Motion, is submitted concurrently herewith.

Dated: November 2, 2020

/s/ Michael D. Warner

Michael D. Warner, Esq. (TX Bar No. 00792304)

**COLE SCHOTZ, P.C.**

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*Counsel for Mark Shapiro, Unsecured Creditor  
Trustee*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 2<sup>nd</sup> day of November, 2020, a true and correct copy of the above and foregoing has been served by electronic transmission to all registered CM/ECF users appearing in these cases.

/s/ Michael D. Warner

Michael D. Warner

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:

NEIGHBORS LEGACY HOLDINGS, INC.,  
*et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 18-33836 (MI)

Jointly Administered

**ORDER SUSTAINING UNSECURED CREDITOR TRUSTEE'S  
FIFTH OMNIBUS OBJECTION TO CLAIMS PURSUANT TO SECTION 502(B)  
OF THE BANKRUPTCY CODE AND RULE 3007 OF THE  
FEDERAL RULES OF BANKRUPTCY PROCEDURE  
SEEKING TO DISALLOW CERTAIN CLAIMS**

**(DUPLICATE CLAIMS)**

[Related Docket No. 1140]

Upon the objection (the “**Objection**”)<sup>2</sup> of Mark Shapiro, Unsecured Creditor Trustee of the Unsecured Creditor Trust (the “**Unsecured Creditor Trustee**”) seeking entry of an order (this “**Order**”) disallowing the Duplicate Claims identified on **Schedule 1** attached hereto, it is **HEREBY ORDERED THAT:**

1. Pursuant to Section 502(b) of the Bankruptcy Code and Bankruptcy Rule 3007, each Duplicate Claim identified on **Schedule 1** to this Order is disallowed in its entirety.

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<sup>1</sup> Due to the large number of Debtors in these chapter 11 cases, a complete list of the Debtors and the last four digits of their tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ proposed claims and noticing agent at [www.kccllc.net/neighbors](http://www.kccllc.net/neighbors). The location of Debtors’ principal place of business and the Debtors’ service address was: 10800 Richmond Avenue, Houston, Texas 77042.

<sup>2</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Objection.

2. The Debtors' Claims Agent is authorized and directed to update the claims register maintained in these chapter 11 cases to reflect the relief granted in this Order.

3. Each claim and the objections by the Unsecured Creditor Trustee to each claim identified in **Schedule 1** constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order will be deemed a separate order with respect to each Duplicate Claim.

4. Except as otherwise provided in this Order, nothing in this Order shall be deemed: (a) an admission as to the validity of any prepetition claim against a Debtor entity or such Debtor entity's estate; (b) a waiver of any party's right to dispute any prepetition claim on any grounds; (c) a promise or requirement to pay any prepetition claim; (d) an implication or admission that any particular claim is of a type specified or defined in this Objection or any order granting the relief requested by this Objection; (e) a request or authorization to assume any prepetition agreement, contract, or lease pursuant to section 365 of the Bankruptcy Code; or (f) a waiver of the Unsecured Creditor Trustee's rights under the Bankruptcy Code or any other applicable law.

5. The terms and conditions of this Order will be immediately effective and enforceable upon its entry.

6. The Unsecured Creditor Trustee, the Claims Agent, and the Clerk of the Court are authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Objection.

*[Remainder of Page Intentionally Left Blank]*

7. This Court shall retain exclusive jurisdiction to resolve any dispute arising from or related to this Order.

Dated: \_\_\_\_\_, 2020

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THE HONORABLE MARVIN ISGUR  
UNITED STATES BANKRUPTCY JUDGE

**SCHEDULE 1**

## DUPLICATE CLAIM(S)

Seq No.	Creditor Name	Creditor Notice Information	Date Filed	Debtor Name	Claim No.	Claim Amount
1	Central Bank of St. Louis	Attn Sally Perez Jenkins & Kling, P.C. 150 N. Meramec Avenue, Suite 400 St. Louis MO, 63105	11/14/2018	NEC Porter Emergency Center, LP	459	\$2,524,029.67
2	Central Bank of St. Louis	Attn Sally Perez Jenkins & Kling, P.C. 150 N. Meramec Avenue, Suite 400 St. Louis MO, 63105	11/14/2018	NEC Texarkana Emergency Center, LP	460	\$2,524,029.67
3	Central Bank of St. Louis	Attn Sally Perez Jenkins & Kling, P.C. 150 N. Meramec Avenue, Suite 400 St. Louis MO, 63105	11/14/2018	NEC Wichita Falls Emergency Center, LP	461	\$2,524,029.67
4	Central Bank of St. Louis	Attn Sally Perez Jenkins & Kling, P.C. 150 N. Meramec Avenue, Suite 400 St. Louis MO, 63105	11/14/2018	NEC Bellaire Emergency Center, LP	462	\$2,524,029.67
5	Central Bank of St. Louis	Attn Sally Perez Jenkins & Kling, P.C. 150 N. Meramec Avenue, Suite 400 St. Louis MO, 63105	11/14/2018	NEC McAllen Emergency Center, LP	464	\$2,524,029.67
6	Central Bank of St. Louis	Attn Sally Perez Jenkins & Kling, P.C. 150 N. Meramec Avenue, Suite 400 St. Louis MO, 63105	11/14/2018	NEC Amarillo Emergency Center, LP	466	\$2,524,029.67
7	Central Bank of St. Louis	Attn Sally Perez Jenkins & Kling, P.C. 150 N. Meramec Avenue, Suite 400 St. Louis MO, 63105	11/14/2018	NEC Brownsville Emergency Center, LP	467	\$2,524,029.67
8	Central Bank of St. Louis	Attn Sally Perez Jenkins & Kling, P.C. 150 N. Meramec Avenue, Suite 400 St. Louis MO, 63105	11/14/2018	NEC Odessa Emergency Center, LP	468	\$2,524,029.67
9	Central Bank of St. Louis	Attn Sally Perez Jenkins & Kling, P.C. 150 N. Meramec Avenue, Suite 400 St. Louis MO, 63105	11/14/2018	NEC College Station Emergency Center, LP	473	\$2,524,029.67
10	Central Bank of St. Louis	Attn Sally Perez Jenkins & Kling, P.C. 150 N. Meramec Avenue, Suite 400 St. Louis MO, 63105	11/14/2018	NEC Harlingen Emergency Center, LP	484	\$2,524,029.67
11	Harry Leiser, Trustee of the Harry Leiser Revocable Trust	Barry S. Feigenbaum, Esquire 185 Asylum Street, 22nd Floor Hartford, CT 06117	09/04/2018	Neighbors Legacy Holdings, Inc.	127	\$277,510.03
12	Harry Leiser, Trustee of the Harry Leiser Revocable Trust	Barry S. Feigenbaum, Esquire 185 Asylum Street, 22nd Floor Hartford, CT 06117	09/07/2018	Neighbors Health, LLC	129	\$277,510.03
13	UnitedHealthcare Insurance Company	Attn CDM/Bankruptcy 185 Asylum Street, 03B Hartford, CT 06103	08/01/2018	NEC Lakeline Emergency Center, LP	60	\$1,336.94

## SURVIVING CLAIM(S)

Creditor Name	Creditor Notice Information	Date Filed	Debtor Name	Claim No.	Claim Amount
Central Bank of St. Louis	Attn Sally Perez Jenkins & Kling, P.C. 150 N. Meramec Avenue, Suite 400 St. Louis MO, 63105	11/14/2018	Neighbors Legacy Holdings, Inc.	470	\$2,524,029.67
Central Bank of St. Louis	Attn Sally Perez Jenkins & Kling, P.C. 150 N. Meramec Avenue, Suite 400 St. Louis MO, 63105	11/14/2018	Neighbors Legacy Holdings, Inc.	470	\$2,524,029.67
Central Bank of St. Louis	Attn Sally Perez Jenkins & Kling, P.C. 150 N. Meramec Avenue, Suite 400 St. Louis MO, 63105	11/14/2018	Neighbors Legacy Holdings, Inc.	470	\$2,524,029.67
Central Bank of St. Louis	Attn Sally Perez Jenkins & Kling, P.C. 150 N. Meramec Avenue, Suite 400 St. Louis MO, 63105	11/14/2018	Neighbors Legacy Holdings, Inc.	470	\$2,524,029.67
Central Bank of St. Louis	Attn Sally Perez Jenkins & Kling, P.C. 150 N. Meramec Avenue, Suite 400 St. Louis MO, 63105	11/14/2018	Neighbors Legacy Holdings, Inc.	470	\$2,524,029.67
Central Bank of St. Louis	Attn Sally Perez Jenkins & Kling, P.C. 150 N. Meramec Avenue, Suite 400 St. Louis MO, 63105	11/14/2018	Neighbors Legacy Holdings, Inc.	470	\$2,524,029.67
Central Bank of St. Louis	Attn Sally Perez Jenkins & Kling, P.C. 150 N. Meramec Avenue, Suite 400 St. Louis MO, 63105	11/14/2018	Neighbors Legacy Holdings, Inc.	470	\$2,524,029.67
Central Bank of St. Louis	Attn Sally Perez Jenkins & Kling, P.C. 150 N. Meramec Avenue, Suite 400 St. Louis MO, 63105	11/14/2018	Neighbors Legacy Holdings, Inc.	470	\$2,524,029.67
Central Bank of St. Louis	Attn Sally Perez Jenkins & Kling, P.C. 150 N. Meramec Avenue, Suite 400 St. Louis MO, 63105	11/14/2018	Neighbors Legacy Holdings, Inc.	470	\$2,524,029.67
Central Bank of St. Louis	Attn Sally Perez Jenkins & Kling, P.C. 150 N. Meramec Avenue, Suite 400 St. Louis MO, 63105	11/14/2018	Neighbors Legacy Holdings, Inc.	470	\$2,524,029.67
Harry Leiser, Trustee of the Harry Leiser Revocable Trust	Barry S. Feigenbaum, Esquire 185 Asylum Street, 22nd Floor Hartford, CT 06117	09/04/2018	NEC West Warwick Emergency Center, LP	128	\$277,510.03
Harry Leiser, Trustee of the Harry Leiser Revocable Trust	Barry S. Feigenbaum, Esquire 185 Asylum Street, 22nd Floor Hartford, CT 06117	09/04/2018	NEC West Warwick Emergency Center, LP	128	\$277,510.03
UnitedHealthcare Insurance Company	Attn CDM/Bankruptcy 185 Asylum Street, 03B Hartford, CT 06103	08/01/2018	Neighbors Legacy Holdings, Inc.	59	\$1,336.94