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Attorneys for Jacob Nathan Rubin, MD, FACC, Patient Care Ombudsman

**UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES DIVISION**

In re:) Lead Case No.: 2:18-bk-20151-ER

**VERITY HEALTH SYSTEM OF
CALIFORNIA, INC. *et al.*,**

Debtor(s).

- ☐ Affects All Debtors
☒ Affects Verity Health System of
California, Inc.
☒ Affects O'Connor Hospital
☒ Affects Saint Louise Regional Hospital
☒ Affects St. Francis Medical Center
☒ Affects St. Vincent Medical Center
☒ Affects Seton Medical Center
☐ Affects O'Connor Hospital Foundation
☐ Affects Saint Louise Regional Hospital
Foundation
☐ Affects St. Francis Medical Center of
Lynwood Foundation
☐ Affects St. Vincent Foundation
☒ Affects St. Vincent Dialysis Center, Inc.
☐ Affects Seton Medical Center
Foundation
☐ Affects Verity Business Services
☒ Affects Verity Medical Foundation
☐ Affects Verity Holdings, LLC
☐ Affects De Paul Ventures, LLC
☒ Affects De Paul Ventures – San Jose
Dialysis, LLC

Debtors and Debtors In Possession

) Jointly Administered With:
) Case No.: 2:18-bk-20162-ER;
) Case No.: 2:18-bk-20163-ER;
) Case No.: 2:18-bk-20164-ER;
) Case No.: 2:18-bk-20165-ER;
) Case No.: 2:18-bk-20167-ER;
) Case No.: 2:18-bk-20168-ER;
) Case No.: 2:18-bk-20169-ER;
) Case No.: 2:18-bk-20171-ER;
) Case No.: 2:18-bk-20172-ER;
) Case No.: 2:18-bk-20173-ER;
) Case No.: 2:18-bk-20175-ER;
) Case No.: 2:18-bk-20176-ER;
) Case No.: 2:18-bk-20178-ER;
) Case No.: 2:18-bk-20179-ER;
) Case No.: 2:18-bk-20180-ER;
) Case No.: 2:18-bk-20181-ER

) Chapter 11 Cases

) **PATIENT CARE OMBUDSMAN'S
MONTHLY FEE APPLICATION FOR
ALLOWANCE AND PAYMENT OF
INTERIM COMPENSATION AND
REIMBURSEMENT OF EXPENSES FOR
THE PERIOD JANUARY 1, 2019
THROUGH JANUARY 31, 2019 FOR
HIMSELF AND FOR DR. TIM STACY
DNP, ACNP-BC**

[NO HEARING REQUIRED]



1 1. Jacob Nathan Rubin, MD, FAAC, the Patient Care Ombudsman (“PCO”) appointed
2 in these chapter 11 bankruptcy cases, hereby submits his Monthly Fee Application (the
3 “Application”) for Allowance and Payment of Interim Compensation and Reimbursement of
4 Expenses for the Period January 1, 2019 through January 31, 2019 (the “Application Period”) for
5 himself and for Dr. Tim Stacy DNP, ACNP-BC (“Dr. Stacy”) who the PCO hired as a consultant in
6 accordance with an order of the Court entered as Docket Number 753. In support of this
7 Application, the PCO respectfully represents as follows:

8
9 2. The PCO incurred a total of \$18,075 in fees and \$0 in expenses during the
10 Application Period for a total of **\$18,075**. The PCO billed 24.1 hours of time during the
11 Application Period. These fees and expenses break down as follows:

Period	Fees	Expenses	Total
1/01/2019-1/31/2019	\$18,075	\$0	\$18,075

15
16 3. Dr. Stacy incurred a total of \$10,855 in fees and \$0 in expenses during the
17 Application Period for a total of **\$10,855**. Dr. Stacy billed 33.4 hours of time during the
18 Application Period. These fees and expenses break down as follows:

Period	Fees	Expenses	Total
1/01/2019-1/31/2019	\$10,855	\$0	\$10,855

22
23 4. In accordance with the Court order entered as Docket Number 826 (the “Fee
24 Procedure Order”), the PCO seeks payment of 80% of his fees and 100% of his expenses incurred
25 during the Application Period, which amounts to a total of **\$14,460**, and Dr. Stacy seeks payment of
26 80% of his fees and 100% of his expenses incurred during the Application Period, which amounts
27 to a total of **\$8,684**.

1 5. For the post-petition period, the PCO and Dr. Stacy have each been paid to date as
2 follows: \$60,540 (PCO) and \$25,064 (Dr. Stacy), which are for 80% of fees and 100% of expenses
3 incurred in October, 2018, \$45,373.61 (PCO) and \$21,580 (Dr. Stacy), which are for 80% of fees
4 and 100% of expenses incurred in November, 2018, and \$34,274.36 (PCO) and \$29,120 (Dr.
5 Stacy), which are for 80% of fees and 100% of expenses incurred in December, 2018

6 6. Through January 31, 2019, the PCO and Dr. Stacy are owed as follows:

7 October 2018: \$15,135 (PCO), \$6,266 (Dr. Stacy)

8 November 2018: \$10,875 (PCO), \$5,395 (Dr. Stacy)

9 December 2018: \$8,190 (PCO), \$7,280 (Dr. Stacy)²

10 January 2019: \$18,075 (PCO), \$10,855 (Dr. Stacy)

11 7. Attached hereto as Exhibit "A" is the name of the PCO and his billing rate and the
12 name of Dr. Stacy and his billing rate. Attached hereto as Exhibit "B" are the detailed time and
13 expense statements for the Application Period for the PCO and for Dr. Stacy.
14

15 8. A copy of this Application has been served by the PCO's counsel by first class mail,
16 postage prepaid, on February 21, 2019, on the Office of the United States Trustee, the above-
17 captioned chapter 11 debtors (the "Debtors"), counsel to the Debtors, counsel to the Official
18 Committee of Unsecured Creditors and all parties who have requested special notice (collectively,
19 the "Notice Parties").
20

21 9. Pursuant to the Fee Procedures Order, the Debtors are authorized to make the
22 payments requested herein to the PCO and Dr. Stacy without a further hearing or order of this Court
23 unless an objection to this Application is filed with the Court and served upon the Notice Parties
24 within ten (10) calendar days after the date of mailing of this Application (i.e., by March 3, 2019).
25

26
27 ² The unpaid amounts for October, November and December 2018 take into account the interim
28 payments that the PCO and Dr. Stacy have received for the fees and costs incurred during these
months.

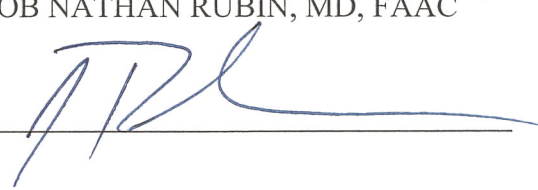
1 If such an objection is timely filed, the Debtors are authorized to pay 80% of the uncontested fees
2 and 100% of the uncontested expenses incurred by the PCO or Dr. Stacy during the Application
3 Period without further order of the Court. If no objection is timely filed, the Debtors are authorized
4 to pay 80% of all fees requested and 100% of all expenses in this Application without further order
5 of the Court.

6 10. The interim compensation and reimbursement of expenses sought in this Application
7 is not final. Upon the conclusion of these chapter 11 bankruptcy cases, the PCO and Dr. Stacy will
8 seek Court approval of all fees and expenses incurred by them in these chapter 11 cases. Any
9 interim fees or reimbursement of expenses paid by the Debtors to the PCO and Dr. Stacy will be
10 credited against such final fees and expenses as may be allowed by this Court.

11
12 WHEREFORE, the PCO respectfully requests that the Debtors pay to the PCO the **\$14,460**
13 requested to be paid to the PCO as set forth in this Application, and the PCO respectfully requests
14 that the Debtor pay to Dr. Stacy the **\$8,684** requested to be paid to Dr. Stacy as set forth in this
15 Application.
16

17 Dated: February 21, 2019

JACOB NATHAN RUBIN, MD, FAAC

18
19 By: 

20
21 Dated: February __, 2019

DR. TIM STACY DNP, ACNP-BC

22 By: _____
23
24
25
26
27
28

1 If such an objection is timely filed, the Debtors are authorized to pay 80% of the uncontested fees
2 and 100% of the uncontested expenses incurred by the PCO or Dr. Stacy during the Application
3 Period without further order of the Court. If no objection is timely filed, the Debtors are authorized
4 to pay 80% of all fees requested and 100% of all expenses in this Application without further order
5 of the Court.

6 10. The interim compensation and reimbursement of expenses sought in this Application
7 is not final. Upon the conclusion of these chapter 11 bankruptcy cases, the PCO and Dr. Stacy will
8 seek Court approval of all fees and expenses incurred by them in these chapter 11 cases. Any
9 interim fees or reimbursement of expenses paid by the Debtors to the PCO and Dr. Stacy will be
10 credited against such final fees and expenses as may be allowed by this Court.

12 WHEREFORE, the PCO respectfully requests that the Debtors pay to the PCO the **\$14,460**
13 requested to be paid to the PCO as set forth in this Application, and the PCO respectfully requests
14 that the Debtor pay to Dr. Stacy the **\$8,684** requested to be paid to Dr. Stacy as set forth in this
15 Application.

17 Dated: February __, 2019

JACOB NATHAN RUBIN, MD, FAAC

19 By:_____

21 Dated: February 20, 2019

DR. TIM STACY DNP, ACNP-BC

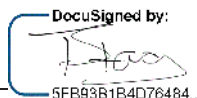
22 By:  _____

EXHIBIT A

EXHIBIT “A”

Professionals and Hourly Rates (1/01/2019 – 1/31/2019)

Professional	Title	Hourly Rate
Jacob Nathan Rubin, MD, FAAC	Patient Care Ombudsman (“PCO”)	\$750.00
Dr. Tim Stacy DNP, ACNP-BC	PCO’s Consultant	\$325.00

EXHIBIT B

LEVENE, NEALE, BENDER, YOO & BRILL L.L.P**LAW OFFICES**

10250 Constellation Boulevard, Suite 1700 Los Angeles, CA 90067-6200

Tel: 310-229-1234 Fax: 310-229-1244 Web: www.lnbyb.com E-Mail: info@lnbyb.com

FEE APPLICATION**Dr. Nathan Rubin****4955 Van Nuys Blvd., #415
Sherman Oaks ,CA 91403****2/20/2019****Nathan Rubin and Timothy Stacy Re Verity Health RB****OUR FILE #: 8713****PROFESSIONAL SERVICE RENDERED FROM 1/1/2019 THROUGH 1/31/2019****ATTORNEY FEES 57.5 28930.00**

Nathan Rubin and Timothy Stacy Re Verity

2/20/2019

Page # 1

CASE # 8713

**From Date 1/1/2019
To Date 1/31/2019**

03 - BUSINESS OPERATIONS

1/3/2019 REVIEW NEW CDPH REPORT SETON MEDICAL CENTER

2223238	TS	325.00	\$487.50	1.5
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1/4/2019 REVIEW SFMC TJC DOCUMENTS;

2223239	TS	325.00	\$487.50	1.5
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1/4/2019 REVIEW SVMC 60 DAY EVIDENCE OF STANDARDS COMPLIANCE REPORT

2223240	TS	325.00	\$812.50	2.5
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1/4/2019 ADVERSE EVENT REVIEW O'CONNOR

2223246	TS	325.00	\$487.50	1.5
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1/10/2019 CDPH SETON

2223241	TS	325.00	\$325.00	1.0
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1/11/2019 TELEPHONE CONFERENCE WITH MONICA KIM REGARDING FRBP NOTICE AND BAA

2223353	NR	750.00	\$150.00	0.2
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1/11/2019 NEW CDPH REPORT SFMC

2223242	TS	325.00	\$487.50	1.5
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1/13/2019 TIRSO CALL

2223247	NR	750.00	\$450.00	0.6
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1/13/2019 CONFERENCE CALL WITH DR. TIERSO DEL JUNCO

2223243	TS	325.00	\$195.00	0.6
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1/14/2019 NEW CDPH REPORT SMC

2223244	TS	325.00	\$487.50	1.5
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1/15/2019 UPDATE OCR, SLRH, SETON, SETON COASTSIDE. ONE DRIVE

2223248	NR	750.00	\$2,250.00	3.0
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Nathan Rubin and Timothy Stacy Re Verity

2/20/2019

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CASE # 8713

From Date 1/1/2019

To Date 1/31/2019

1/15/2019 JACHO REPORT SFMC

2223245	TS	325.00	\$975.00	3.0
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1/16/2019 REVIEW ONE DRIVE. CONFERENCE WITH MR FRATZKE AND DR DOUVILLE.

2223249	NR	750.00	\$4,875.00	6.5
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1/16/2019 REVIEW INITIAL REPORT, REVIEW ONE-DRIVE REPORTS AND VIDEO CONFERENCE CALL WITH MARK FRATZKE AND DR. DOUVILLE.

2223214	TS	325.00	\$2,112.50	6.5
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1/17/2019 DOCUMENT REVIEW

2223250	NR	750.00	\$1,125.00	1.5
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1/17/2019 CONFERENCE MR HENLEY

2223252	NR	750.00	\$375.00	0.5
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1/17/2019 TIRSO CALL

2223254	NR	750.00	\$450.00	0.6
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1/17/2019 REVIEW EVIDENCE OF COMPLIANCE SETON

2223256	NR	750.00	\$1,125.00	1.5
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1/17/2019 CALLS TO ACMG, BREASTLINK CLINICS, URGENT CARES ETC

2223217	TS	325.00	\$1,787.50	5.5
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1/17/2019 CONFERENCE MR. HENLEY

2223220	TS	325.00	\$162.50	0.5
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1/18/2019 CALLS DR PEREZ AND DR KIELEY.

2223258	NR	750.00	\$825.00	1.1
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1/18/2019 EVIDENCE OF COMPLIANCE CDPH FILING SMC

2223221	TS	325.00	\$487.50	1.5
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1/22/2019 TELEPHONE CONFERENCE WITH MONICA KIM REGARDING DECEMBER DOCUMENTS

2223355	NR	750.00	\$150.00	0.2
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Nathan Rubin and Timothy Stacy Re Verity

2/20/2019

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CASE # 8713

**From Date 1/1/2019
To Date 1/31/2019**

1/22/2019 TJC ACTION PLAN REVIEW

2223227	TS	325.00	\$812.50	2.5
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1/22/2019 NEW CDPH FILING SFMC

2223229	TS	325.00	\$325.00	1.0
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1/22/2019 TELEPHONE CONFERENCE WITH MONICA KIM REGARDING DECEMBER DOCUMENTS

2223358	TS	325.00	\$65.00	0.2
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1/28/2019 DR PEREZ. CALL

2223260	NR	750.00	\$750.00	1.0
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1/30/2019 CDPH ONSITE VISIT REPORT OCH

2223235	TS	325.00	\$325.00	1.0
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1/31/2019 CALL TIRSO

2223261	NR	750.00	\$900.00	1.2
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Total		\$24,247.50	51.2
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04 - CASE ADMINISTRATION

1/3/2019 EMAILS REVIEWED FROM JHONETTE CHONG RE CDPH

2223263	NR	750.00	\$225.00	0.3
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1/4/2019 EMAILS REVIEWED FROM JHONETTE CHONG
RE SFMC TJC

2223264	NR	750.00	\$225.00	0.3
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1/4/2019 EMAILS REVIEWED FROM JHONETTE CHONG RE SVMC>EVIDENCE OF COMPLIANCE.

2223276	NR	750.00	\$225.00	0.3
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1/4/2019 EMAILS REVIEWED FROM JHONETTE CHONG RE SETON STATE BOARD OF PHARMACY.

2223278	NR	750.00	\$225.00	0.3
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1/10/2019 EMAILS REVIEWED FROM JHONETTE CHONG RE CDPH.SETON

2223295	NR	750.00	\$225.00	0.3
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Nathan Rubin and Timothy Stacy Re Verity

2/20/2019

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CASE # 8713

**From Date 1/1/2019
To Date 1/31/2019**

1/11/2019 EMAILS REVIEWED FROM JHONETTE CHONG RE CDPH ST FRANCIS

2223297	NR	750.00	\$225.00	0.3
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1/14/2019 EMAILS REVIEWED FROM JHONETTE CHONG RE CDPH SMC

2223298	NR	750.00	\$225.00	0.3
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1/15/2019 EMAILS REVIEWED FROM JHONETTE CHONG RE PCO REQUESTS.

2223302	NR	750.00	\$225.00	0.3
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1/15/2019 EMAILS REVIEWED FROM JHONETTE CHONG RE TJC SVMC

2223303	NR	750.00	\$225.00	0.3
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1/15/2019 EMAILS REVIEWED FROM JHONETTE CHONG RE JACHO.SFMC

2223304	NR	750.00	\$225.00	0.3
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1/16/2019 EMAILS REVIEWED FROM JHONETTE CHONG RE TJC ACTION PLAN. SMC.

2223308	NR	750.00	\$225.00	0.3
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1/16/2019 EMAILS REVIEWED FROM JHONETTE CHONG RE CDPH NOTIFICATION. OCH

2223309	NR	750.00	\$225.00	0.3
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1/16/2019 EMAILS REVIEWED FROM JHONETTE CHONG
RE MQSA SURVEY. OCH.

2223310	NR	750.00	\$300.00	0.4
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1/17/2019 EMAILS REVIEWED FROM JHONETTE CHONG RE NEW DOCUMENTS. SLRH

2223316	NR	750.00	\$300.00	0.4
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1/17/2019 EMAILS REVIEWED FROM JHONETTE CHONG
RE EVIDENCE OF COMPLIANCE WITH CDPH. SMC.

2223344	NR	750.00	\$300.00	0.4
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1/22/2019 EMAILS REVIEWED FROM JHONETTE CHONG
RE TJC ACTION PLAN FINAL. SMC.

2223345	NR	750.00	\$300.00	0.4
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1/22/2019 EMAILS REVIEWED FROM JHONETTE CHONG
RE CDPH LETTER. SFMC.

2223347	NR	750.00	\$300.00	0.4
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Nathan Rubin and Timothy Stacy Re Verity

2/20/2019

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CASE # 8713

From Date 1/1/2019

To Date 1/31/2019

1/30/2019 EMAILS REVIEWED FROM JHONETTE CHONG
RE CDPH ONSITE VISIT. OCH.

2223348	NR	750.00	\$300.00	0.4
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Total			\$4,500.00	6.0
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07 - FEE / EMPLOYMENT APPLICATIONS

1/7/2019 TELEPHONE CONFERENCE WITH MONICA KIM REGARDING PAYMENT OF FEES

2223351	TS	325.00	\$32.50	0.1
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1/31/2019 TELEPHONE CONFERENCE WITH MONICA KIM REGARDING OBJECTION DEADLINE FOR
DECEMBER FEE APPS

2223364	NR	750.00	\$150.00	0.2
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Total			\$182.50	0.3
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INDIVIDUAL ACTIVITIES

2/20/2019 Page 1

Nathan Rubin and Timothy Stacy Re Verity Health
CASE # 8713

SERVICE RENDERED FROM 1/1/2019 THROUGH 1/31/2019

03 - BUSINESS OPERATIONS

NR	17.9	750.00	\$13,425.00
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TS	33.3	325.00	\$10,822.50
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Total Hours	51.2	Total Fees	\$24,247.50
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INDIVIDUAL ACTIVITIES

2/20/2019 Page 2

Nathan Rubin and Timothy Stacy Re Verity Health
CASE # 8713

SERVICE RENDERED FROM 1/1/2019 THROUGH 1/31/2019

04 - CASE ADMINISTRATION

NR	6.0	750.00	\$4,500.00
Total Hours	6.0	Total Fees	\$4,500.00

INDIVIDUAL ACTIVITIES

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Nathan Rubin and Timothy Stacy Re Verity Health
CASE # 8713

SERVICE RENDERED FROM 1/1/2019 THROUGH 1/31/2019

07 - FEE / EMPLOYMENT APPLICATIONS

NR	0.2	750.00	\$150.00
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TS	0.1	325.00	\$32.50
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Total Hours	0.3	Total Fees	\$182.50
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PROFESSIONAL ACTIVITY SUMMARY

Nathan Rubin and Timothy Stacy Re Verity Health

2/20/2019

CASE # 8713

From Date 1/1/2019

To Date 1/31/2019

NR	24.1	Hours @	750.00	\$18,075.00
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TS	33.4	Hours @	325.00	\$10,855.00
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Total Hours	57.5	Total Fees	\$28,930.00
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ACTIVITY SUMMARY

Nathan Rubin and Timothy Stacy Re Verity Health

2/20/2019

CASE # 8713

From Date 1/1/2019

To Date 1/31/2019

DESCRIPTION	FEE\$
BUSINESS OPERATIONS	\$24,247.50
CASE ADMINISTRATION	\$4,500.00
FEE / EMPLOYMENT	\$182.50
TOTAL FEES	\$28,930.00

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

10250 Constellation Blvd., Suite 1700, Los Angeles, CA 90067

A true and correct copy of the foregoing document entitled (*specify*): **PATIENT CARE OMBUDSMAN'S MONTHLY FEE APPLICATION FOR ALLOWANCE AND PAYMENT OF INTERIM COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD JANUARY 1, 2019 THROUGH JANUARY 31, 2019 FOR HIMSELF AND FOR DR. TIM STACY DNP, ACNP-BC** will be served or was served (**a**) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (**b**) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) February 21, 2019, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On February 21, 2019, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL

(*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on February 21, 2019, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Via Attorney Service
The Honorable Ernest M. Robles
United States Bankruptcy Court, #1560
255 E. Temple Street
Los Angeles, CA 90012

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

February 21, 2019

Jason Klassi

/s/ Jason Klassi

Date

Printed Name

Signature

2:18-bk-20151-ER Notice will be electronically mailed to:

Robert N Amkraut on behalf of Creditor Swinerton Builders
ramkraut@foxrothschild.com

Kyra E Andrassy on behalf of Creditor MGH Painting, Inc.
kandrassy@swelawfirm.com, csheets@swelawfirm.com;gcruz@swelawfirm.com;jchung@swelawfirm.com

Kyra E Andrassy on behalf of Interested Party Courtesy NEF
kandrassy@swelawfirm.com, csheets@swelawfirm.com;gcruz@swelawfirm.com;jchung@swelawfirm.com

Simon Aron on behalf of Interested Party RCB Equities #1, LLC
saron@wrslawyers.com

Lauren T Attard on behalf of Creditor SpecialtyCare Cardiovascular Resources, LLC
lattard@bakerlaw.com, abalian@bakerlaw.com

Keith Patrick Banner on behalf of Creditor Abbott Laboratories Inc.
kbanner@greenbergglusker.com, sharper@greenbergglusker.com;calendar@greenbergglusker.com

Keith Patrick Banner on behalf of Interested Party CO Architects
kbanner@greenbergglusker.com, sharper@greenbergglusker.com;calendar@greenbergglusker.com

Cristina E Bautista on behalf of Creditor Health Net of California, Inc.
cristina.bautista@kattenlaw.com, ecf.lax.docket@kattenlaw.com

James Cornell Behrens on behalf of Creditor Committee Official Committee of Unsecured Creditors of Verity
Health System of California, Inc., et al.
jbehrens@milbank.com,
gbray@milbank.com;mshinderman@milbank.com;hmaghakian@milbank.com;dodonnell@milbank.com;jbre
wster@milbank.com;JWeber@milbank.com

Ron Bender on behalf of Health Care Ombudsman J. Nathan Ruben
rb@lnbyb.com

Ron Bender on behalf of Health Care Ombudsman Jacob Nathan Rubin
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Bruce Bennett on behalf of Creditor Nantworks, LLC
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