

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

PHYSIOTHERAPY HOLDINGS, INC., *et al.*,¹

Debtor.

Chapter 11

Case No. 13-12965 (KG)

Jointly Administered

Re: Dkt. No. 73

SKILLSOFT CORPORATION’S OBJECTION TO PROPOSED CURE COSTS

SkillSoft Corporation is a corporation located at 107 Northeastern Blvd, Nashua, N.H. 03062 (“SkillSoft”). Physiotherapy Corporation (“Debtor”) asserts that SkillSoft is a contract counterparty. The Debtor identifies the contract on its schedule of proposed assumed contracts as “Training program and services agreement expiring 10/2016” (“Contract”). SkillSoft hereby objects to the Debtor’s estimated cure amount of \$0.00, and states that the correct cure amount is

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal taxpayer-identification number, are: Physiotherapy Holdings, Inc. (5193); Actra Rehabilitation Associates, Inc. (7806); Alexandria Sports, Inc. (7654); Benchmark Acquisition Corp. (3850); Benchmark Medical Management Company (0335); Benchmark O&P Holdings, Inc. (6848); Benchmark Orthotics & Prosthetics, Inc. (7000); Blue Hen Physical Therapy, Inc. (7267); Cape Prosthetics-Orthotics, Inc. (7914); Carrollton Physical Therapy Clinic, Inc. (2832); Integrity Physical Therapy, Inc. (1075); Keystone Rehabilitation Associates of Warren (8341); Keystone Rehabilitation Systems, Inc. (8380); Keystone Rehabilitation Systems of McMurray (6304); Leesburg Sports, Inc. (4190); MATRIX Healthcare Services, LLC (7344); MATRIX Rehabilitation, Inc. (3147); MATRIX Rehabilitation-Delaware, Inc. (2504); MATRIX Rehabilitation-Georgia, Inc. (4073); MATRIX Rehabilitation-Ohio, Inc. (2505); MATRIX Rehabilitation-South Carolina, Inc. (5603); MATRIX Rehabilitation-Texas, Inc. (9542); Morris Area Rehabilitation Association, Inc. (2043); North Dallas Physical Therapy Associates, Inc. (5331); Northstar Health Services, Inc. (7152); NSHS Services, Inc. (6789); Orthopaedic Services of Paducah, Inc. (3143); PhysioLink Corporation (3705); Physiotherapy Associates Holdings, Inc. (3367); Physiotherapy Associates, Inc. (7193); Physiotherapy Associates-Union Rehab, LLC (0041); Physiotherapy Corporation (3816); Physiotherapy-BMHI Holdings, Inc. (3361); Physiotherapy-BMI, Inc. (4107); Potomac Rehabilitation Services, Inc. (2725); Professional Rehab Associates, Inc. (2393); Progressive Therapy Services, Inc. (8449); Rehab Associates, L.L.C. (9381); Rehab Colorado, LLC (5804); Rehab Missouri, LLC (0587); Rehab Xcel, LLC (0586); Rehabilitation Consultants, Inc. (1166); R.S. Network, Inc. (9104); SMR Banyan Tree, Inc. (6933); Swanson Orthotic & Prosthetic Center, Inc. (2308); The Parks Physical Therapy and Work Hardening Center, Inc. (2926); Theraphysics Partners of Colorado, Inc. (2115); Theraphysics Partners of Texas, Inc. (9976); Therapy Associates of Martinsville, Inc. (1394); Trumbull P.T. Corp. (3855); Wisconsin Prosthetics and Orthotics, Inc. (7815). The Debtors' main corporate address is 855 Springdale Drive, Suite 200, Exton, PA 19341.



\$17,395.46, as set forth in detail the attached calculation of claim sheet and in the attached, unpaid invoice.

WHEREFORE, SkillSoft respectfully requests that this Court:

- 1) Condition assumption of the Contract on payment of cure costs in the amount of \$17,295.46;
- 2) Grant such other relief as is just and equitable.

Dated: December 12, 2013

THE ROSNER LAW GROUP LLC

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*Attorneys for Respondent
SkillSoft Corporation*

Exhibit

Calculation of Claim Sheet and Unpaid Invoice

EXPLANATION OF CLAIM SHEET
Chapter 11 Case No.: 13-12965 (KG)
Debtors: Physiotherapy Holdings, Inc., et al.

Calculation of Cure Amount:

Claim	Amount
1. Amount due for the license period of 10/15/2013 through 10/14/2014 referenced on Invoice # 0000119878 per Order Form dated 10/15/2013 to the Master License Agreement dated 10/15/2009 by and between Skillsoft Corporation and Physiotherapy Associates.	\$17,395.46
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<u>Cure Amount:</u>	\$17,395.46

INVOICE



Skillssoft Corporation D.B.A. Skillssoft Direct
 107 Northeastern Blvd.
 Nashua, NH, 03062
 United States
 www.skillssoft.com

Invoice #: 0000119878
BU/Contract #: STUSD/CON010939
Customer Number: CUS007638
Sales Rep: Carr,Michael Aaron
PO Number:
Invoice Date: 10/30/2013
Payment Terms: Net 30
Due Date: 11/29/2013

Bill To: Physiotherapy Associates
 Angela McClure
 855 Springdale Drive
 Suite 200
 Exton PA 19341
 United States

Remit to address Skillssoft Corporation
 Bank Of America
 SkillsSoft c/o 913261
 PO Box 4090 STN A
 Toronto ON M5W 0E9
 Canada

Ship To: Physiotherapy Associates
 Angela McClure
 855 Springdale Drive
 Suite 200
 Exton PA 19341
 United States

Wiring Information: Account: # [REDACTED]
 Bank Code: # [REDACTED]
 Swift Code: # [REDACTED]

Federal ID Number: [REDACTED]

Description	Amount
Compliance User Based Library	
Custom Course Development - LC	
Objects Hosting Custom Content	
User Based Library W/HOST	

Line Total:	USD	16,523.97
Product Subtotal:	USD	16,523.97
Total Sales Tax:	USD	871.49
Total Amount Due:	USD	17,395.46

Term:	Start Date: 10/15/2013	End Date: 10/14/2014
Notes:	Per Order Form to the Master License Agreement signed October 25, 2013. Year 1 Invoice.	

For billing questions, please call	AR Specialist	Phone: 6033243000 Option 9	Fax: 603/324-3009
or email:	Receivables@skillssoft.com		