



Counsel

Anthony J. Gulotta, *deceased*
Michael G. Gulotta, *NY/NJ/EDNY*
Hon. Janine Barbera-Dalli, *of counsel*

2459 Ocean Avenue, Suite A
Ronkonkoma, New York 11779
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CLERK

U.S. BANKRUPTCY COURT
DISTRICT OF DELAWARE

Legal Assistants

Vivian Contressa
Jacqueline Verni

October 27, 2021

Office of the Clerk of the United States Bankruptcy Court for the District of Delaware
724 North Market Street
Wilmington, DE 19801

Re: United States Bankruptcy Court for the District of Delaware
BL RESTAURANTS HOLDING, LLC, et al.
Case No. 20-10156 (CTG)

Dear Sir/Madam:

We received the Notice of First Omnibus Objection in the mail on October 26, 2021 which was filed on October 19, 2021.

Please allow this letter to serve as a Response to the First Omnibus Objection as to Insufficient Document Claims on behalf of claimant Patricia Romano Claim No. 10112 for the litigation-personal injury claim.

Our client has an open and pending claim with Sedgwick the program administrator for Starr Indemnity & Liability Co. on behalf of BL Restaurant Operations, LLC for personal injuries including but not limited to facial lacerations and concussion sustained due to the negligence of BL Restaurant that took place on October 28, 2018 at the premises known as Bar Louie located at 215 Jericho Turnpike Commack, New York. Annexed hereto is a copy of the letter acknowledging our claim and representation dated November 9, 2018.

In April 2020 our official demand to the adjuster at Sedgwick was \$140,000.00. Additional records were forwarded in May 2020 and Sedgwick representative confirmed in June 2020 she was in receipt of the same and will review. We then received a letter dated September 9, 2020 advising that BL Restaurant Operations, LLC (dba Bar Louie) filed for bankruptcy.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Michael G. Gulotta', is written over the typed name.

MICHAEL G. GULOTTA

MGG/jv
Enclosure

cc: Womble Bond Dickinson (US) LLP
1313 North Market Street, Suite 1200
Wilmington, Delaware 19801
Attn: Matthew P. Ward
Morgan L. Patterson

Kelly Drye & Warren LLP
3 World Trade Center
175 Greenwich Street
New York, New York 10007
Attn: Jason R. Adams
Lauren S. Schlussel
Connie Choe

Claims Management Services, Inc.
 Box 14155
 Lexington, KY 40512-4155



November 09, 2018

Anthony J. Gulotta Attorney at Law
 Anthony Gulotta
 2459 Ocean Ave.
 Ronkonkoma NY 11779

RECEIVED
 NOV 15 2018

RE: Account: BL Restaurant Operations, LLC
 Claimant: Patricia Romano
 Date of Loss: 10/28/2018
 Claim Number: 30181320179-0002
 Insurer: Starr Indemnity & Liability Co

Dear Anthony Gulotta,

This letter is an acknowledgement of your representation of the above named client. Please direct all correspondence and telephone calls to me.

I would like to take a statement from your client regarding the accident. Please notify me as to the most convenient date and time.

In addition, I am requesting the following information from your client, so that I may complete my investigation of the claim:

- Full Name and Address
- Date of Birth and Social Security number
- Marital Status, and spouse's name, if applicable
- Injuries, along with the name, address, and phone number of all the physicians that are presently treating your client
- Description of what happened, including exact location, independent witness(es) names, pictures of the scene, etc.
- Name of the person to whom the incident was reported, and the date that it was reported

If you have any questions regarding this matter, please feel free to contact me.

Sincerely,
 Steve Abel
 Claims Examiner
 Direct Dial: (515)327-4856
 Toll Free: (800)358-2072
 Facsimile: (859)264-4074
 E-mail: Steve.Abel@sedgwick.com



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11/9/2018

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Gulotta Gulotta <info@gulottagulotta.com>

Patricia Romano: Claim - 30181320179-0001 - Date of Loss: 10/28/2018

6 messages

Gulotta Gulotta <info@gulottagulotta.com>

Fri, Apr 24, 2020 at 11:11 AM

To: "Caruthers, Penny" <Penny.Caruthers@sedgwick.com>

Penny,

We received your voicemail. Hope you are doing well amidst this crazy health crisis.

We would like to discuss settlement on this claim. Our client is not currently treating. However, she plans on continuing with scar revision for her facial scar, and she is considering continued vision therapy for her blurred vision.

At this point we would make an *official* demand of \$140,000. We do have some room to negotiate. If you would provide us with a reasonable offer, we would be better able to present something to our client and hopefully move this along.

Thank you so much for the update on the med pay check being mailed to us. I really appreciate all of your help with this one. Please stay safe!

Sincerely,

Michael

Gulotta & Gulotta, PLLC

2459 Ocean Avenue

Suite A

Ronkonkoma, NY 11779

p: 631.285.7000

f: 631.285.7006



Gulotta Gulotta <info@gulottagulotta.com>

Fri, May 29, 2020 at 1:36 PM

To: "Caruthers, Penny" <Penny.Caruthers@sedgwick.com>

Penny,

Attached please find additional medical records from Eye Vision Associates on this matter.

Thank you,

Gulotta & Gulotta, PLLC

2459 Ocean Avenue

Suite A

Ronkonkoma, NY 11779

p: 631.285.7000

f: 631.285.7006



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Gulotta Gulotta <info@gulottagulotta.com>
To: "Caruthers, Penny" <Penny.Caruthers@sedgwick.com>

Fri, May 29, 2020 at 1:37 PM

Gulotta & Gulotta, PLLC

2459 Ocean Avenue

Suite A

Ronkonkoma, NY 11779

p: 631.285.7000

f: 631.285.7006



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 **Patricia Romano - Eye Vision Associates.pdf**
1803K

Caruthers, Penny <Penny.Caruthers@sedgwick.com>
To: Gulotta Gulotta <info@gulottagulotta.com>

Wed, Jun 10, 2020 at 4:16 PM

Good afternoon,

I am acknowledging receipt of the additional medical records and official demand. I will review and get back to you soon.

Thanks!

Penny Caruthers | Examiner - Liability

Sedgwick Claims Management Services, Inc.

DIRECT (501) 235-5467 | EMAIL Penny.Caruthers@sedgwick.com

www.sedgwick.com | Caring counts®



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Any personal data acquired, processed or shared by us will be lawfully processed in line with applicable data protection legislation. If you have any questions regarding how we process personal data refer to our Privacy Notice <https://www.sedgwick.com/global-privacy-policy>. Any communication including this email and files/attachments transmitted with it are confidential and are intended solely for the use of the individual or entity to whom they are addressed. If this message has been sent to you in error, you must not copy, distribute or disclose of the information it contains and you must notify us immediately (contact is within the privacy policy) and delete the message from your system.

Gulotta Gulotta <info@gulottagulotta.com>
To: "Caruthers, Penny" <Penny.Caruthers@sedgwick.com>

Wed, Aug 19, 2020 at 9:39 AM

Good morning,

We were just following up on this matter and see if there was anything additional needed for this claim. Please let us know.

Hope you are doing well!

Thank you,

Gulotta & Gulotta, PLLC

2459 Ocean Avenue
Suite A
Ronkonkoma, NY 11779
p: 631.285.7000
f: 631.285.7006



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Sedgwick Claims Management Services, Inc.
P.O. Box 14155
Lexington, KY 40512-4155



Phone: (800)358-2072
Fax: (859)264-4074

September 09, 2020

Gulotta & Gulotta, PLLC
2459 Ocean Avenue
Suite A
Ronkonkoma, NY 11779

Account:	BL Restaurant Operations, LLC
Claimant Name:	Patricia Romano
Date of Loss:	10/28/2018
Claim Number:	30181320179-0001
Insurer:	Starr Indemnity & Liability Co

Dear Gulotta & Gulotta,

Sedgwick is the program administrator for Starr Indemnity & Liability Co. on behalf of BL Restaurant Operations, LLC.

As you are aware, BL Restaurant Operations, LLC (dba Bar Louie) filed for Bankruptcy on 1/28/2020. Should you be pursuing financial relief, all claims relevant to policy year May 30, 2018 to May 30, 2019, policy number 1000305159181, fall under the Sales Order entered into in *In re: BL Restaurants Holding, LLC*; Case No. 20-10156, In the United States Bankruptcy Court for the District of Delaware, and must be submitted to the Estate.

Sincerely,

Penny Caruthers
Claims Examiner
Sedgwick
Phone: (501) 235-5467
Penny.Caruthers@Sedgwick.com

Sedgwick manages claims on behalf of Starr Indemnity & Liability Co.

Any person who knowingly and with intent to defraud any insurance company or other person files an application for insurance or statement of claim containing any materially false information, or conceals for the purpose of misleading, information concerning any fact material thereto, commits a fraudulent insurance



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9/9/2020

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