

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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	:	Chapter 11
In re:	:	
	:	Case No. 18-71748-67 (AST)
Orion HealthCorp, Inc., <i>et al.</i> ,	:	Case No. 18-71789 (AST)
	:	Case No. 18-74545 (AST)
Debtors.	:	
	:	(Jointly Administered)
-----	X	
	:	
Howard M. Ehrenberg in his capacity as	:	
Liquidating Trustee of Orion HealthCorp Inc., <i>et</i>	:	
<i>al.</i> ,	:	Adv. Pro. No. 18-08053 (AST)
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
Parmjit Singh Parmar a/k/a Paul Parmar, <i>et al.</i> ,	:	
	:	
Defendants.	:	
-----	X	

AFFIDAVIT OF SERVICE

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

CASSANDRA MURRAY, being duly sworn, deposes and says:

1. I am employed as a Senior Case Manager by Epiq Corporate Restructuring, LLC¹, located at 777 Third Avenue, New York, New York 10017. I am over the age of eighteen years and am not a party to the above-captioned action.
2. On March 15, 2022, I caused to be served the “Plaintiff’s Initial Disclosures Pursuant to Fed. R. Civ. P. 26(a)(1),” dated March 15, 2022, a sample of which is annexed hereto as Exhibit A, by causing true and correct copies to be:
 - a. enclosed securely in separate postage pre-paid envelopes and delivered via first class mail to those parties listed on the annexed Exhibit B, and

¹ Epiq Bankruptcy Solutions, LLC, is now known as Epiq Corporate Restructuring, LLC.

- b. delivered via electronic mail to those parties listed on the annexed Exhibit C.
- 3. All envelopes utilized in the service of the foregoing contained the following legend:
“LEGAL DOCUMENTS ENCLOSED. PLEASE DIRECT TO THE ATTENTION OF
ADDRESSEE, PRESIDENT OR LEGAL DEPARTMENT.”

/s/ Cassandra Murray
Cassandra Murray

Sworn to before me this

15th day of March, 2022

/s/ Panagiota Manatakis

Notary Public, State of New York

No. 01MA6221096

Qualified in Queens County

Commission Expires April 26, 2022

EXHIBIT A

Mark T. Power, Esq.
 John P. Amato, Esq.
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 HAHN & HESSEN LLP**
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Counsel to the Liquidating Trustee

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 alissa.piccione@troutman.com

Counsel to the CC Capital Plaintiffs

UNITED STATES BANKRUPTCY COURT
 EASTERN DISTRICT OF NEW YORK

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In re:	: Chapter 11
	:
Orion HealthCorp, Inc., <i>et al.</i> ,	: Case No. 18-71748-67 (AST)
	: Case No. 18-71789 (AST)
Debtors.	: Case No. 18-74545 (AST)
	:
-----	x
Howard M. Ehrenberg in his capacity as	: (Jointly Administered)
Liquidating Trustee of Orion Healthcorp, Inc.,	:
<i>et al.</i> , CHT Holdco, LLC, and CC Capital CHT	:
Holdco LLC,	:
	:
Plaintiffs,	: Adv. Pro. No. 18-08053 (AST)
v.	:
	:
Parmjit Singh Parmar a/k/a Paul Parmar, <i>et al.</i> ,	:
	:
Defendants.	:
-----	x

PLAINTIFFS' INITIAL DISCLOSURES
PURSUANT TO FED. R. CIV. P. 26(a)(1)

Plaintiffs Howard M. Ehrenberg, in his capacity as the Liquidating Trustee ("Liquidating Trustee") of Orion HealthCorp, Inc. ("Orion"), Constellation Healthcare Technologies, Inc. ("CHT"), and certain of their affiliated debtors and debtors-in-possession in the above-captioned chapter 11 cases (collectively, the "Debtors"), by his undersigned

counsel, and CHT Holdco, LLC and CC Capital CHT Holdco LLC (collectively, the CC Capital Plaintiffs, and together with the Liquidating Trustee, “Plaintiffs”), by and through their undersigned counsel, in accordance with Federal Rule of Civil Procedure (“Fed. R. Civ. P.”) 26(a)(1), made applicable to this proceeding pursuant to Federal Rule of Bankruptcy Procedure 7026, makes the following initial disclosures. Plaintiffs reserve the right to amend and/or supplement these disclosures.

RESERVATIONS

1. These disclosures are based upon information reasonably available to Plaintiffs as of this date. Continuing investigation and discovery may alter these disclosures. Accordingly, Plaintiffs reserve the right to supplement the information disclosed below if additional information becomes available.

2. By making these disclosures, Plaintiffs do not represent that any particular document exists within its possession, custody or control.

3. These initial disclosures are made without waiver of, or prejudice to, any objections Plaintiffs may have. Plaintiffs expressly reserve all objections, including, but not limited to, objections on the grounds of (a) relevance, (b) attorney-client privilege, (c) the attorney work-product doctrine, (d) any other applicable privilege or protection under federal or applicable state law, (e) undue burden, (f) immateriality, and (g) overbreadth.

4. Plaintiffs reserve the right to clarify, amend, modify, or supplement the information contained in these initial disclosures, if and when it obtains supplemental information, to the extent required by the Federal Rules of Civil Procedure.

5. Plaintiffs expressly reserve the right to identify and call as a witness additional persons other than those listed below, if, during the course of discovery and investigation

relating to these actions, Plaintiffs learn that such additional persons have knowledge of relevant matters.

6. These initial disclosures are made subject to and without limiting any of the foregoing reservations.

INITIAL DISCLOSURES¹

I. Identification of Persons and/or Entities

In accordance with Fed. R. Civ. P. 26(a)(1)(A)(i), the following individuals may have discoverable information that Plaintiffs may use to support their claims. Plaintiffs make no representation as to the extent of such person's knowledge and reserve the right to amend and/or supplement this disclosure.

Name	Last Known Address	May possess information relating to:
Frank A. Lazzara	J.S. Held LLC 48 Wall Street, Floor 17 New York, NY 10005 (929) 567-3178	Forensic investigation of Debtors' books and records and financial condition, including the collection of Debtors' electronically stored information
Timothy J. Dragelin, (Debtors' Interim Chief Executive Officer and Chief Restructuring Officer)	FTI Consulting, Inc. 201 S. College St., Suite 2350 Charlotte, NC 28244 (704) 972-4102	Debtors' business, financial affairs and operations; restructuring and sale of Debtors after October 2017
Chinh Chu	c/o Troutman Pepper Hamilton Sanders LLP 875 Third Avenue New York, NY 10022	The go-private Merger transaction
Douglas Newton	c/o Troutman Pepper Hamilton Sanders LLP 875 Third Avenue New York, NY 10022	The go-private Merger transaction

¹ Capitalized terms not otherwise defined herein shall have the same meaning ascribed to them in the Second Amended Adversary Proceeding Complaint filed on January 14, 2021 (the "Complaint") [Doc. 303].

Name	Last Known Address	May possess information relating to:
Richard DiBlasi	c/o Troutman Pepper Hamilton Sanders LLP 875 Third Avenue New York, NY 10022	The go-private Merger transaction
John Altorelli	Aequum Law 555 Madison Avenue New York, New York 10022 (917) 664-6607	The go-private Merger transaction
Parmjit Singh Parmar a/k/a Paul Parmar	18/19 Colts Gait Lane Colts Neck, NJ 07722	Business relationship between Debtors and Defendants; Debtors' financial affairs and business practices during the historical period
Sotirios Zaharis	1304 Plaza Drive Woodbridge, NJ 07095	Business relationship between Debtors and Defendants; Debtors' financial affairs and business practices during the historical period
Ravi Chivukula	111 Round Hills Drive Freehold, NJ 07095	Business relationship between Debtors and Defendants; Debtors' financial affairs and business practices during the historical period
Pavan Bakhshi	161 W 15th Street, Apt. 1A New York, NY 10011	Business relationship between Debtors and Defendants; Debtors' financial affairs and business practices during the historical period
Truc To	KPMG 345 Park Avenue New York, NY 10154 (212) 758-9700	The go-private Merger transaction; Debtors' business, financial affairs and operations
Kiran Sharma	5 Muncee Court Holmdel, NJ 07733	Defendant The Red Fronted Macaw Trust and the Riverside Boulevard Property
Harmohan Parmar a/k/a Harry Parmar	40 Broad Street, Apt. 20FG New York, NY 10004	Defendant Dioskouroi Kastor Polydeuces, LLC and The Broad Street Property

Name	Last Known Address	May possess information relating to:
Joel Plasco	40 Walker Street, Apt. 5 New York, NY 10013	Business relationship between Debtors and Defendants; Debtors' financial affairs and business practices during the historical period
Tomer Vardi	Unknown	Defendant Aquila Alpha LLC and the Colts Neck Property Mortgage
John Petrozza	7305 Belle Meade Island Drive Miami, FL 33138	Business relationship between Debtors and Defendants; Defendant Aquila Alpha LLC and the Colts Neck Property Mortgage
Adam J. Greene A. Mitchell Greene	Robinson Brog Leinwand Greene Genovese & Gluck, P.C. 875 Third Avenue New York, NY 10022 (212) 603-6300	Business relationship between Debtors and Defendants; Debtors' financial affairs and business practices during the historical period
Matthew Doughty	DWF LLP 20 Fenchurch Street London EC 3M 3 AG 333-320-4440	The go-private Merger transaction
Jerold C. Feuerstein	Kriss & Feuerstein LLP 360 Lexington Ave., Suite 1200 New York, NY 10017 (212) 661-2900	Defendant Aquila Alpha LLC and the Colts Neck Property Mortgage
Christopher M. Zochowski Christina T. Roupas	Winston & Strawn LLP 200 Park Avenue New York, NY 10166 (212) 294-6700	The go-private Merger transaction
Stephen Older Jeffrey L. Rothschild	McGuire Woods LLP 1251 Avenue of the Americas, 20th Floor New York, NY 10020 (212) 548-2100	The go-private Merger transaction
Scott Mathieson Stuart Andrews	finnCap Ltd 60 New Broad Street London EC2M 1JJ	The go-private Merger transaction

Name	Last Known Address	May possess information relating to:
Kevin Mole Jonathan Hastens Deepali Narula	McKinsey & Company 3 World Trade Center 175 Greenwich Street New York, NY 10007 (212) 446-7000	The go-private Merger transaction
Salvatore L. Lavadera Howard Condo Leonard M. Friedman Donald Methfessel	Rosenberg Rich Baker Berman & Company 265 Davidson Avenue Suite 210 Somerset, NJ 08873 (908) 231-1000	Debtors' financial affairs and business practices during the historical period; the go-private Merger transaction

In addition to the individuals and Defendants identified above, Plaintiffs name each of the Debtors' and Defendants' former and/or present principals, officers, directors, members, employees, agents, advisors and/or other professionals, and expressly reserve the right to call such persons as witnesses.

II. Documents

In accordance with Fed. R. Civ. P. 26(a)(1)(A)(ii), general categories of documents in Plaintiffs' possession, custody or control, that Plaintiffs may use to support their claims may include, but are not limited to:

Category	Location
Debtors' electronically stored information, including, without limitation, Office 365 mailboxes of Debtors' former officers, directors and/or employees, Debtors' financial systems, accounting records, bank statements, and certain file storage devices	Debtors' electronically stored information is currently being stored on an electronic database hosted by FTI Consulting, Inc.
Copies of Debtors' physical servers and/or their back-up data	Offices of FTI Consulting, Inc.
Debtors' physical records	Certain of Debtors' physical records are currently being stored at Thompson Coburn

Category	Location
	Hahn & Hessen LLP's off-site storage facility. Additional physical records of the Debtors are also stored at two facilities, Iron Mountain and Access, but the Liquidating Trustee has not been granted access to those accounts or the records stored in connection therewith.
CC Capital Plaintiffs' records that relate to the go-private Merger transaction	Offices of CC Capital Plaintiffs

These documents will be either produced or made available for inspection upon a proper request, except that no documents will be disclosed to the extent that they contain privileged, protected and/or confidential information. Plaintiffs reserve the right to rely upon documents produced or described by any and all of the parties in this proceeding.

III. Computation of Damages

A computation of each category of damages required to be disclosed under Fed. R. Civ. P. 26(a)(1)(A)(iii) is premature at this time. Plaintiffs require discovery before it is able to compile and produce a detailed computation of damages sought on their claims. After discovery, Plaintiffs may amend and/or supplement this information in accordance with the applicable rules. Subject to their right to amend, the damages claimed by Plaintiffs is set forth in the Complaint and includes, but is not limited to, the following: the Parmar Shareholder Payments, the Parmar Deal Fee, the Parmar Real Property, the Colts Neck Property Mortgage, the Equity Contribution, the Remaining YC Escrowed Funds, and Plaintiffs' attorneys' fees, costs and expenses.

IV. Insurance Agreements

In accordance with Fed. R. Civ. P. 26(a)(1)(A)(iv), Plaintiffs are unaware of any insurance agreements relevant to this action.

Dated: New York, New York
March 15, 2022

**THOMPSON COBURN HAHN &
HESSEN LLP**

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EXHIBIT B

SERVICE LIST

Claim Name	Address Information
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KIRAN SHARMA	5 MUNCEE CT. HOLMDEL NJ 07733-1246
MUKASEY FRENCHMAN & SKLAROFF LLP	ATTN KENNETH A CARUSO (COUNSEL TO PAVANDEEP BAKHSHI) 2 GRAND TOWER, 140 E 45TH ST., 17TH FLR NEW YORK NY 10017
RAVI CHIVUKULA	119A JASON WAY NORTH ARLINGTON NJ 07031-5025
RAVI CHIVUKULA	111 ROUND HILL DR FREEHOLD NJ 07728
RAVI CHIVUKULA	3400 HIGHWAY 35 S SUITE 9 HAZLET NJ 07730
RAVI CHIVUKULA	765 BANYAN COURT MORGANVILLE NJ 07751-1762
RAVI CHIVUKULA	2 RIVER TERRACE APT. 12J NEW YORK NY 10282-1251
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SOTIRIOS ZAHARIS	2 RIVER TERRACE APT. 12J NEW YORK NY 10282-1251
THE RED FRONTED MACAW TRUST	C/O KIRAN SHARMA, TRUSTEE 5 MUNCEE CT HOLMDEL NJ 07733-1246
THOMPSON COBURN HAHN & HESSEN LLP	ATTN: JOHN P. AMATO AND MARK T. POWER 488 MADISON AVENUE NEW YORK NY 10022
TROUTMAN PEPPER HAMILTON SANDERS LLP	ATTN: ALISSA K. PICCIONE 875 THIRD AVE NEW YORK NY 10022
TROUTMAN PEPPER HAMILTON SANDERS LLP	ATTN: J. TIMOTHY MAST, BIANCA DIBELLA 600 PEACHTREE ST. NE, SUITE 3000 ATLANTA GA 30308
WINDELS MARX LANE & MITTENDORF, LLP	ATTN: CHARLES E. SIMPSON, ESQ (COUNSEL TO PARMJIT SINGH PARMAR, ET AL) 156 WEST 56TH STREET NEW YORK NY 10019

Total Creditor count 19

EXHIBIT C

ORION HEALTHCORP, INC., et al. – Case No. 18-08053 (AST)
Electronic Mail Master Service List

Name	Email
Thompson Coburn Hahn & Hessen LLP	JAmato@hahn Hessen.com; JOrbach@hahn Hessen.com; BRose@hahn Hessen.com; mpower@hahn Hessen.com
Hughes Hubbard & Reed LLP	erin.diers@hugheshubbard.com; derek.adler@hugheshubbard.com; elizabeth.beitler@hugheshubbard.com
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