

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF FLORIDA  
FORT LAUDERDALE DIVISION  
[www.flsb.uscourts.gov](http://www.flsb.uscourts.gov)

In re:

Chapter 11 Cases

DELPHI BEHAVIORAL HEALTH  
GROUP, LLC, *et al.*,<sup>1</sup>

Case No. 23-10945-PDR

(Jointly Administered)

Debtors.

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**DEBTORS' FIFTH OMNIBUS OBJECTIONS TO CLAIMS**  
**(Claims Not Consistent with Debtors' Books and Records)**

**IMPORTANT NOTICE TO CREDITOR:  
THIS IS AN OBJECTION TO YOUR CLAIM**

**This objection seeks either to disallow or reduce the amount or change the priority status of the claim filed by you or on your behalf. Please read this objection carefully to identify which claim is objected to and what disposition of your claim is recommended.**

**If you disagree with the objection or the recommended treatment, you must file a written response WITHIN 30 DAYS from the date of service of this objection, explaining why your claim should be allowed as presently filed, and you must serve a copy to the undersigned attorneys for the Debtors, Paul Steven Singerman, Esq., Robin J. Rubens, Esq., and Paul A. Avron, Esq., Berger Singerman LLP, 1450 Brickell Avenue, Suite 1900, Miami, FL 33131, OR YOUR CLAIM MAY BE DISPOSED OF IN ACCORDANCE WITH THE RECOMMENDATION IN THIS OBJECTION.**

<sup>1</sup> The address of the Debtors is 1901 West Cypress Creek Road, Suite 500, Fort Lauderdale, FL 33309. The last four digits of the Debtors' federal tax identification numbers are: (i) Delphi Behavioral Health Group, LLC (2076), (ii) 61 Brown Street Holdings, LLC (0007), (iii) Aloft Recovery LLC (6674), (iv) Banyan Recovery Institute, LLC (6998), (v) Breakthrough Living Recovery Community, LLC (5966), (vi) California Addiction Treatment Center LLC (7655), (vii) California Vistas Addiction Treatment LLC (8272), (viii) DBHG Holding Company, LLC (6574), (ix) Defining Moment Recovery Community, LLC (3532), (x) Delphi Health BuyerCo, LLC (2325), (xi) Delphi Health Group, LLC (0570), (xii) Delphi Intermediate HealthCo, LLC (6378), (xiii) Delphi Management LLC (6474), (xiv) Desert View Recovery Community, LLC (7437), (xv) DR Parent, LLC (2700), (xvi) DR Sub, LLC (8183), (xvii) Las Olas Recovery LLC (9082), (xviii) Maryland House Detox, LLC (1626), (xix) New Perspectives, LLC (0508), (xx) Next Step Housing LLC (6975), (xxi) Ocean Breeze Detox, LLC (7019), (xxii) Ocean Breeze Recovery, LLC (9621), (xxiii) Onward Living Recovery Community, LLC (4735), (xxiv) Palm Beach Recovery, LLC (4459), (xxv) Peak Health NJ, LLC (7286), (xxvi) QBR Diagnostics, LLC (7835), (xxvii) Rogers Learning, LLC (1699), (xxviii) SBH Haverhill, LLC (0971), (xxix) SBH Union IOP LLC (4139), (xxx) Summit at Florham Park, LLC (8226), (xxxi) Summit Behavioral Health Limited Liability Company (3337), (xxxii) Summit Health BuyerCo, LLC (2762), (xxxiii) Summit IOP Limited (4567), and (xxxiv) Union Fresh Start LLC (6841).

**If your entire claim is objected to and this is a chapter 11 case, you will not have the right to vote to accept or reject any proposed plan of reorganization until the objection is resolved, unless you request an order pursuant to Bankruptcy Rule 3018(a) temporarily allowing your claim for voting purposes.**

**The written response must contain the case name, case number, and must be filed with the Clerk of the United States Bankruptcy Court, United States Courthouse, 299 East Broward Blvd., Room 112, Fort Lauderdale, FL 33301.**

The above-captioned debtors and debtors in possession (collectively, the “Debtors”), by and through undersigned counsel, pursuant to Federal Rule of Bankruptcy Procedure 3007, Local Rule 3007-1, and the *Order Granting Debtors’ Ex Parte Motion (I) to Add Claim Objection Categories to Omnibus Objections; and (II) to Waive Requirements of Local Rule 3007-1(C) That Objection Be Limited to Five Claims Per Pleading* [ECF No. 335], hereby file this omnibus objection (the “Objection”) to the claims listed on the attached **Exhibit “A”** (each a “Claim”, collectively, the “Claims”), as follows:

**Exhibit “A”: Claims Not Consistent with Debtors’ Books and Records:** The Debtors object to the Claims set forth on Exhibit “A” on the basis that the Debtors’ books and records do not reflect that any debt is owed to the claimants and the documentation attached to the Claims, if any, fails to establish a Claim. As a result, the Debtors seek to disallow each Claim set forth on Exhibit “A” in its entirety.

The Debtors request that the Claims set forth on Exhibit “A” be treated as noted above and that these Claims be treated as set forth herein in accordance with the Bankruptcy Code.

**All Claimants that have received this Objection should locate their name(s) on the attached Exhibit “A” which lists the claimants alphabetically.**

The Debtors reserve their rights to amend the Objection to the claim set forth herein, to object on additional grounds not set forth herein and/or to object to any further claims not presently set forth herein. By filing this Objection, the Debtors do not waive their right to file further objections or to pursue avoidance actions or other causes of action.

**WHEREFORE**, the Debtors respectfully request that the Court (1) treat the Claims as set forth herein, as recommended by the Debtors, without prejudice to the rights of the Debtors, or other interested party to file further objections or to pursue avoidance actions or other causes of action; and (2) grant such other and further relief as is just and appropriate.

Dated: April 24, 2023

Respectfully submitted,

BERGER SINGERMANN LLP  
*Counsel for the Debtors and  
Debtors-in-Possession*  
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By: /s/ Paul A. Avron  
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**EXHIBIT “A”**

<b>Debtor</b>	<b>Claim No.</b>	<b>Name of Claimant</b>	<b>Claim Amount</b>	<b>Recommended Disposition</b>
Palm Beach Recovery, LLC	39	CDS Systems / Custom Designed Security Systems PO Box 1497 Bushnell, FL 33513	\$1,240.00	Claim should be stricken and disallowed in its entirety.
Palm Beach Recovery, LLC	10085	Harmony Hills Behavioral Health, LLC c/o Bernice Lee, Esq. Kozyak Tropin & Throckmorton LLP 2525 Ponce de Leon Blvd. 9th Floor Miami, FL 33134	\$556,392.00	Claim should be stricken and disallowed in its entirety.
Delphi Behavioral Health Group, LLC	10068	Ironshore Specialty Insurance Company Liberty Mutual Insurance Attn: J. Lawson 100 Liberty Way Dover, NH 03820	Undetermined	Claim should be stricken and disallowed in its entirety.
Delphi Behavioral Health Group, LLC	49	Life Insurance Company of North America Attn: Lisa Durrenberger, Senior Specialist 51 Madison Avenue, 10th Floor New York, NY 10010  and  Jeffrey Wisler, Esq. Connolly Gallagher, LLP 1201 North Market Street 20th Floor Wilmington, DE 19801	\$6,079.85	Claim should be stricken and disallowed in its entirety.

<b>Debtor</b>	<b>Claim No.</b>	<b>Name of Claimant</b>	<b>Claim Amount</b>	<b>Recommended Disposition</b>
Delphi Behavioral Health Group, LLC	38	Marlin Leasing Corporation/ Peac Solutions 300 Fellowship Road Mt. Laurel, NJ 08054	\$88,489.36	Claim should be stricken and disallowed in its entirety.
Delphi Intermediate HealthCo, LLC	50	NWI Haverhill Hospital LP Attn: Timothy W. Brink Meltzer Purtill & Stelle LLC 125 South Wacker Drive Suite 2900 Chicago, IL 60606	Undetermined	Claim should be stricken and disallowed in its entirety. The claim references an order resolving Claimant's objection to assumption and assignment of the underlying lease that had been submitted to the Court, but not yet entered; however, the Court subsequently entered the Order [ECF No. 382].
SBH Haverhill, LLC	10072	NWI Haverhill Hospital LP Attn: Timothy W. Brink Meltzer Purtill & Stelle LLC 125 South Wacker Drive Suite 2900 Chicago, IL 60606	Undetermined	Claim should be stricken and disallowed in its entirety. The claim references an order resolving Claimant's objection to assumption and assignment of the underlying lease that had been submitted to the Court, but not yet entered; however, the Court subsequently entered the Order [ECF No. 382].
Delphi Behavioral Health Group, LLC	10083	Vogel, David PO Box 7874 Redlands, CA 92375	\$344,523.52	Claim should be stricken and disallowed in its entirety.