

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.

**TWELFTH OMNIBUS OBJECTION TO CLAIMS**  
**(Late Filed Claims)**

**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 (5643), (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.**

Joseph Luzinski, in his capacity as the Liquidating Trustee of the Delphi Behavioral Health Group, LLC et al. Liquidating Trust, established in the above-captioned chapter 11 cases of Delphi Behavioral Health Group, LLC and affiliated debtors (collectively, the “Liquidating Debtors”), by and through undersigned counsel, pursuant to Federal Rule of Bankruptcy Procedure 3007 and 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 files this omnibus objection (the “Objection”) to the claims listed on the attached **Exhibit “A”** (each a “Claim”, collectively, the “Claims”), as follows:

**Exhibit “A”**: *Late Filed Claims*: The Liquidating Trustee, on behalf of the Liquidating Debtors, objects to the Claims set forth on Exhibit “A” on the basis that the Claims were filed after the claims bar date of April 17, 2023, and administrative expense claims bar date of July 21, 2023, respectively, and therefore, are deemed late filed. As a result, the Liquidating Trustee seeks to disallow each Claim set forth on Exhibit “A” in its entirety.

The Liquidating Trustee, on behalf of the Liquidating Debtors, requests 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 Liquidating Trustee, on behalf of the Liquidating Debtors, reserves his 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 Liquidating Trustee does not waive his right to file further objections or to pursue avoidance actions or other causes of action.

**WHEREFORE**, the Liquidating Trustee, on behalf of the Liquidating Debtors, respectfully requests that the Court (1) treat the Claims as set forth herein, as recommended by the Liquidating Trustee, without prejudice to the rights of the Liquidating Trustee, 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: October 16, 2023

Respectfully submitted,

BERGER SINGERMANN LLP  
*Counsel for the Liquidating Trustee*  
1450 Brickell Avenue, Ste. 1900  
Miami, FL 33131  
Telephone: (305) 755-9500  
Facsimile: (305) 714-4340

By: /s/ Paul A. Avron  
Paul A. Avron  
Florida Bar No. 50814  
[pavron@bergersingerman.com](mailto:pavron@bergersingerman.com)

**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	121	Dealers First Financial, LLC PO Box 1069 Bellville, TX 77418-1069	\$1,877.85	Claim should be stricken and disallowed in its entirety.
Delphi Behavioral Health Group, LLC	10142	Pitney Bowes Global Financial Services 27 Waterview Drive Shelton, CT 06484	\$1,932.44	Claim should be stricken and disallowed in its entirety.