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May 29, 2024

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The Honorable Alan S. Trust  
United States Bankruptcy Court  
Eastern District of New York  
Alfonse M. D'Amato Federal Courthouse  
290 Federal Plaza  
Central Islip, New York 11722

**Re: In re Orion HealthCorp, Inc., et al.  
Howard M. Ehrenberg v. Arvind Walia;  
Niknim Management Inc.  
USBC EDNY Adv. Proc. No. 20-08049-ast**

**and**

**Howard M. Ehrenberg v. Abruzzi Investment;  
John Petrozza  
USBC EDNY Adv. Proc. No. 20-08052-ast**

Dear Judge Trust:

We are counsel for Howard M. Ehrenberg in his capacity as Liquidating Trustee of Orion Healthcorp, Inc., *et al.* (the "Liquidating Trustee") in the above referenced adversary proceeding.

As the Court may recall, following the summary judgment motion hearings, the Adversary Pretrial Scheduling Orders set the two adversaries for trial on **July 24, 2024**, as to the Niknim/Walia adversary and **July 25, 2024** at 9:30 am as to the Abruzzi Investments, LLC and John Petrozza adversary, along with a final pre-trial conference of July 17, 2024.

We write to the Court as to report a trial conflict with the July 24 and 25th trial dates. The Trustee retained an expert, Craig Jacobson of B. Riley Financial, who issued a report in both adversaries on the issue of insolvency. Mr. Jacobson is scheduled for trial in unrelated litigation in the United States District Court, Southern District Florida, and he is scheduled to testify in the trial the week of July 22-26, 2024. The trial in Florida requires his attendance in person and since Mr. Jacobson's



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report will be entered into evidence by the Trustee in both adversaries before this Court, Mr. Jacobson must be present in the Bankruptcy Court E.D.N.Y for potential cross-examination. Under these circumstances, the Trustee reluctantly must request a continuance of the trial dates for both adversaries.

Counsel for the Trustee apologizes for the inconvenience but will make every effort to reschedule the matters or be present with trial calendars of witnesses if the Court schedules these matters for a trial scheduling conference.

Very truly yours,

*/s/ Jeffrey P. Nolan*

Jeffrey P. Nolan

cc: Anthony F. Giuliano, Esq. (Via ECF)  
(Counsel for Defendants, Abruzzi Investments LLC and John Petrozza)