

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

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*Attorneys for Movants, Eric M. Kaprowski, Executor
of the Estate of Allison Kaprowski, deceased, and
Hailey Kaprowski, individually*

In re:

**ATLANTIC NEUROSURGICAL
SPECIALISTS, P.A.¹**

Debtor.



Order Filed on November 15, 2024
by Clerk
U.S. Bankruptcy Court
District of New Jersey

Chapter 11

Case No. 24-15726 (VFP)

Jointly Administered
Case No. 24-15727 (VFP)

**CONSENT ORDER GRANTING MOTION OF ERIC M. KAPROWSKI,
EXECUTOR OF THE ESTATE OF ALLISON KAPROWSKI, DECEASED,
AND HAILEY KAPROWSKI, INDIVIDUALLY, FOR RELIEF FROM THE
AUTOMATIC STAY PURSUANT TO 11 U.S.C. § 362(D)**

The relief set forth on the following pages is hereby ORDERED.

DATED: November 15, 2024

A handwritten signature in black ink, appearing to read "Vincent F. Papalia".

Honorable Vincent F. Papalia
United States Bankruptcy Judge

¹ Jointly administered with ANS Newco, LLC (Case No. 24-15727) and Hanover Hills Surgery Center LLC (Case No. 24-16995).

Debtor: ATLANTIC NEUROSURGICAL SPECIALISTS, P.A., et al.,
Case No: 24-15726 (VFP)
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§ 362(d)

Upon consideration of Eric M. Kaprowski, Executor of the Estate of Allison Kaprowski, deceased, and Hailey Kaprowski's Motion for Relief from Automatic Stay Pursuant to 11 U.S.C. § 362(d), and any objections thereto, and the Movants having agreed to release the Debtors' bankruptcy estates from any liability for their claims,² and having agreed to limit any recovery on their claims to the applicable insurance coverage under policies maintained by the Debtors as of the date of the claim held by Movants, and cause having been found under Section 362(d) of the Bankruptcy Code to grant the relief in the Motion, it is hereby:

ORDERED that said Motion is GRANTED, and the stay is modified so as to permit the Movants, subject to the provisions of this Order, to continue the Civil Litigation (as defined in the Motion) against Debtor, Atlantic Neurosurgical Specialists, P.A., pending in the Superior Court of New Jersey and captioned: Eric M. Kaprowski, Executor of the Estate of Allison Kaprowski, deceased, and Hailey Kaprowski, individually v. Atlantic Neurosurgical Specialists, P.A., Superior Court New Jersey (Union County), Case No. UNN-L-002653-24; it is further

ORDERED that Movants shall not retain any claims against the Debtors' bankruptcy estates, but the Movants' claims shall not be discharged; it is further

ORDERED that the Movants shall limit any recovery on their claims to the applicable insurance coverage maintained by the Debtors as of the date of the claims.

² Nothing herein shall be construed to limit or release Movants' claims against any available insurance proceeds.

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§ 362(d)

THE PARTIES BELOW, AND EACH OF THEM INTENDING TO BE MUTUALLY BOUND,
DO SET THEIR HANDS UPON THIS ORDER ON THE DATES INDICATED BELOW AND
CONSENT TO THE RELIEF PROVIDED FOR HEREIN.

By: /s/ Ernest P. Fronzuto
Ernest P. Fronzuto, Esq.
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*Counsel to Movants, Eric M. Kaprowski,
Executor of the Estate of Allison Kaprowski,
deceased, and Hailey Kaprowski, individually*

Dated: October 23, 2024

By: /s/ David L. Bruck
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*Counsel to Debtor, Atlantic Neurosurgical
Specialists, P.A.*

Dated: October 23, 2024