

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

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In re:

MBMG HOLDING, LLC, *et al.*,¹

Debtors.

Chapter 11 Cases

Case No. 24-20576-CLC

(Jointly Administered)

DEBTORS' THIRD OMNIBUS OBJECTION TO CLAIMS
(Satisfied 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, Jordi Gusó, Esq. and Clay B. Roberts, 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.

The written response must contain the case name, case number, and must be filed with the Clerk of the United States Bankruptcy Court, C. Clyde Atkins United States Courthouse, 301 North Miami Avenue, Room 150, Miami, FL 33128.

¹ The address of the Debtors is 7500 S.W. 8th Street, Ste. 400, Miami, Florida 33144. The last four digits of the Debtors' federal tax identification numbers are: (i) CCMG Wind Down, LLC f/k/a Care Center Medical Group, LLC (9052); (ii) CCN Wind Down, LLC f/k/a Care Center Network, LLC (5784); (iii) CCMC Wind Down, Inc. f/k/a CCMC Physician Holdings, Inc. (4532); (iv) CCP Wind Down, LLC f/k/a Clinical Care Pharmacy, LLC (2103); (v) FFPCC Wind Down, LLC f/k/a Florida Family Primary Care Center, LLC (5005); (vi) FFPCCP Wind Down, LLC f/k/a Florida Family Primary Care Center of Pasco, LLC (8570); (vii) FFPCCO Wind Down, LLC f/k/a Florida Family Primary Care Centers of Orlando, LLC (3086); (viii) FFPCCPN Wind Down, LLC f/k/a Florida Family Primary Care Centers of Pinellas, LLC (7075); (ix) FFPCCCT Wind Down, LLC f/k/a Florida Family Primary Care Centers of Tampa, LLC (0631); (x) MBMO Wind Down, LLC f/k/a MB Medical Operations, LLC (8450); (xi) MBMT Wind Down, LLC f/k/a MB Medical Transport, LLC (3476); (xii) MBMG Holding, LLC (3880); (xiii) MBMG Intermediate Holding, LLC (9320); (xiv) RD Wind Down, Inc. f/k/a Miami Beach Medical Centers, Inc. (3933); (xv) MBMC Wind Down, LLC f/k/a Miami Beach Medical Consultants, LLC (2737); and (xvi) MMWC Wind Down, LLC f/k/a Miami Medical & Wellness Center, LLC (2474).

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 Each Objection Be Limited to Five Claims Per Pleading* [ECF No. 341], 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”: *Satisfied Claims*: The Debtors object to the Claims set forth on Exhibit “A” on the basis that the Debtors’ books and records reflect payment has already been made in full satisfaction of the Claims. Accordingly, 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: January 27, 2025

Respectfully submitted,

BERGER SINGERMANN LLP
Counsel for Debtor and Debtor-in-Possession
1450 Brickell Avenue, Ste. 1900
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By: /s/ Clay B. Roberts
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EXHIBIT “A”

Debtor	Claim No.	Name of Claimant	Claim Amount	Recommended Disposition
MBMG Holding, LLC	10009	Broward County Attn: Stacy E. Wulfekuhle 115 S. Andrews Ave., Rm. 423 Ft. Lauderdale, FL 33301	\$4,558.05	Claim should be stricken and disallowed in its entirety.
MBMO Wind Down, LLC f/k/a MB Medical Operations, LLC	10050	Everbank N.A. Attn: Annette Valentin McGovern 10 Waterview Blvd. Parsippany, NJ 07054 and Diane Wells 901 Ponce de Leon Blvd. Coral Gables, FL 33134	\$124,878.41	Claim should be stricken and disallowed in its entirety.
MBMT Wind Down, LLC f/k/a MB Medical Transport, LLC	10051	Everbank N.A. Attn: Annette Valentin McGovern 10 Waterview Blvd. Parsippany, NJ 07054 and Diane Wells 901 Ponce de Leon Blvd. Coral Gables, FL 33134	\$116,109.00	Claim should be stricken and disallowed in its entirety.
MBMC Wind Down, LLC f/k/a Miami Beach Medical Consultants, LLC	10052	Everbank N.A. Attn: Annette Valentin McGovern 10 Waterview Blvd. Parsippany, NJ 07054 and Diane Wells 901 Ponce de Leon Blvd. Coral Gables, FL 33134	\$116,109.00	Claim should be stricken and disallowed in its entirety.

Debtor	Claim No.	Name of Claimant	Claim Amount	Recommended Disposition
RD Wind Down, Inc. f/k/a Miami Beach Medical Centers, Inc.	10053	Everbank N.A. Attn: Annette Valentin McGovern 10 Waterview Blvd. Parsippany, NJ 07054 and Diane Wells 901 Ponce de Leon Blvd. Coral Gables, FL 33134	\$116,109.00	Claim should be stricken and disallowed in its entirety.
MBMT Wind Down, LLC f/k/a MB Medical Transport, LLC	10056	Mercedes-Benz Financial Services USA LLC Attn: Steven B. Grow Warner Norcross + Judd LLP 700 Terrace Point Road. Ste. 350 Muskegon, MI 49443	\$325,692.91	Claim should be stricken and disallowed in its entirety.
MBMO Wind Down, LLC f/k/a MB Medical Operations, LLC	10064	Patterson Dental Supply, Inc. c/o Bassford Remele 100 South Fifth St., Ste. 1500 Minneapolis, MN 55402 and Patterson Companies Attn: Christopher Camardello 1031 Mendota Heights Rd. St. Paul, MN 55120	\$51,362.16	Claim should be stricken and disallowed in its entirety.
MBMO Wind Down, LLC f/k/a MB Medical Operations, LLC	10066	Patterson Dental Supply, Inc. c/o Bassford Remele 100 South Fifth St., Ste. 1500 Minneapolis, MN 55402 and Patterson Companies Attn: Christopher Camardello 1031 Mendota Heights Rd. St. Paul, MN 55120	\$55,980.88	Claim should be stricken and disallowed in its entirety.

Debtor	Claim No.	Name of Claimant	Claim Amount	Recommended Disposition
MBMO Wind Down, LLC f/k/a MB Medical Operations, LLC	10067	Patterson Dental Supply, Inc. c/o Bassford Remele 100 South Fifth St., Ste. 1500 Minneapolis, MN 55402 and Patterson Companies Attn: Christopher Camardello 1031 Mendota Heights Rd. St. Paul, MN 55120	\$17,168.35	Claim should be stricken and disallowed in its entirety.
MBMO Wind Down, LLC f/k/a MB Medical Operations, LLC	10068	Patterson Dental Supply, Inc. c/o Bassford Remele 100 South Fifth St., Ste. 1500 Minneapolis, MN 55402 and Patterson Companies Attn: Christopher Camardello 1031 Mendota Heights Rd. St. Paul, MN 55120	\$42,353.34	Claim should be stricken and disallowed in its entirety.
MBMO Wind Down, LLC f/k/a MB Medical Operations, LLC	10069	Patterson Dental Supply, Inc. c/o Bassford Remele 100 South Fifth St., Ste. 1500 Minneapolis, MN 55402 and Patterson Companies Attn: Christopher Camardello 1031 Mendota Heights Rd. St. Paul, MN 55120	\$62,434.77	Claim should be stricken and disallowed in its entirety.
MBMT Wind Down, LLC f/k/a MB Medical Transport, LLC	10038	The Huntington National Bank 11100 Wayzata Blvd., Ste. 700 Minnetonka, MN 55305	\$23,979.84	Claim should be stricken and disallowed in its entirety.

Debtor	Claim No.	Name of Claimant	Claim Amount	Recommended Disposition
MBMT Wind Down, LLC f/k/a MB Medical Transport, LLC	10039	The Huntington National Bank 11100 Wayzata Blvd., Ste. 700 Minnetonka, MN 55305	\$21,602.08	Claim should be stricken and disallowed in its entirety.