

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' FIFTH OMNIBUS OBJECTION TO CLAIMS
(Misclassified 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”: Misclassified Claims: The Debtors object to the Claims set forth on Exhibit “A” on the basis that they have been misclassified, *i.e.*, claims that were filed as unsecured, priority claims are in fact unsecured, non-priority claims. There is no basis in law or fact to allow the Claims set forth on Exhibit “A” as anything other than unsecured, non-priority claims. Accordingly, the Debtors seek to reclassify the Claims set forth on Exhibit “A” as unsecured, non-priority claims.

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: February 4, 2025

Respectfully submitted,

BERGER SINGERMANN LLP
Counsel for Debtor and Debtor-in-Possession
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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
MBMO Wind Down, LLC f/k/a MB Medical Operations, LLC	10023	Best Office Coffee Service, Inc. 13130 S.W. 130 th Terrace Miami, FL 33186 Attn: Juan Gonzalez	\$22,416.52	Claim should be reclassified and allowed as a general unsecured claim in the amount of \$22,416.52.
MBMO Wind Down, LLC f/k/a MB Medical Operations, LLC	3	De Lage Landen Financial Services, Inc. 1111 Old Eagle School Road Wayne, PA 19087 Attn: Ray Ridge, Litigation & Bankruptcy Specialist	\$312,655.70	Claim should be reclassified as a general unsecured claim and reduced and allowed in the amount of \$7,118.49.
MBMT Wind Down, LLC f/k/a MB Medical Transport, LLC	10049	Enterprise FM Trust c/o Geoffrey S. Goodman, Esq. Foley & Lardner LLP 321 N. Clark Street, Ste. 3000 Chicago, IL 60654 -and- Enterprise FM Trust 5105 Johnson Road Coconut Creek, FL 33073 Attn: Daniel Garcia	\$31,952.87	Claim should be reclassified and allowed as a general unsecured claim in the amount of \$31,952.87.
MBMC Wind Down, LLC f/k/a Miami Beach Medical Consultants, LLC	28	Humana Insurance Company, Human Health Insurance Company of Florida, Inc., Humana Medical Plan, Inc. and their affiliates (“Humana”) c/o Ken Thomas, Esq. Fox Swibel Levin & Carroll 200 W. Madison, Ste. 3000 Chicago, IL 60606 -and- Humana 3401 S.W. 160 th Avenue Miramar, FL 33027 Attn: Jessica Alfonso, Director of Primary Care Strategies	\$2,630.95	Claim should be reclassified and allowed as a general unsecured claim in the amount of \$2,630.95.

Debtor	Claim No.	Name of Claimant	Claim Amount	Recommended Disposition
MBMG Holding, LLC	10006	Illusion Beauty for Seniors, LLC 260 N.W. 107 th Avenue, Apt. 215 Miami, FL 33172 Attn: Yaritza Masdeu	\$600.00	Claim should be reclassified and allowed as a general unsecured claim in the amount of \$600.00.