

Hearing Date: February 25, 2026 at 11 30 a.m. (Eastern Time)  
Objection Deadline: January 26, 2026 at 5:00 p.m. (Eastern Time)

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK**

In re:

ORION HEALTHCORP, INC.,<sup>1</sup>

Debtor.

Chapter 11

Case No. 18-71748 (AST)

HOWARD M. EHRENBERG IN HIS CAPACITY  
AS LIQUIDATING TRUSTEE OF ORION  
HEALTHCORP, INC., et al.,

Plaintiff,

- against -

ABRUZZI INVESTMENTS, L.L.C.; JOHN  
PETROZZA,

Defendant.

Adversary Proc. No. 20-08052 (AST)

**NOTICE OF MOTION TO  
STRIKE OBJECTIONS AND CROSS-MOTION AND SUR-REPLIES**  
**[Dkt. Nos 166, 171, 172, 174, 175 and 176]**

**PLEASE TAKE NOTICE THAT** Plaintiff, Howard M. Ehrenberg in his capacity as  
Liquidating Trustee of Orion Healthcorp, Inc., et al., (the “Plaintiff” or the “Liquidating

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Orion Healthcorp, Inc. (7246); Constellation Healthcare Technologies, Inc. (0135); NEMS Acquisition, LLC (7378); Northeast Medical Solutions, LLC (2703); NEMS West Virginia, LLC (unknown); Physicians Practice Plus Holdings, LLC (6100); Physicians Practice Plus, LLC (4122); Medical Billing Services, Inc. (2971); Rand Medical Billing, Inc. (7887); RMI Physician Services Corporation (7239); Western Skies Practice Management, Inc. (1904); Integrated Physician Solutions, Inc. (0543); NYNM Acquisition, LLC (unknown) Northstar FHA, LLC (unknown); Northstar First Health, LLC (unknown); Vachette Business Services, Ltd. (4672); Phoenix Health, LLC (0856); MDRX Medical Billing, LLC (5410); VEGA Medical Professionals, LLC (1055); Allegiance Consulting Associates, LLC (7291); Allegiance Billing & Consulting, LLC (7141); New York Network Management, LLC (7168). The corporate headquarters and the mailing address for the Debtors listed above is 1715 Route 35 North, Suite 303, Middletown, NJ 07748.

Trustee”), by and through his attorneys, hereby files Plaintiff’s Motion to Strike Objection and Cross-Motion and Sur-Replies; Docket Nos. 166, 171, 172, 174, 175 and 176, as lacking a proper legal basis and propounded solely for the purposes of delay and obstruction. (the “Motion”).

**PLEASE TAKE FURTHER NOTICE THAT** that a telephonic hearing (the “Hearing”) to consider the relief requested in the Motion will be held before the Honorable Alan S. Trust, Chief United States Bankruptcy Judge for the Eastern District of New York, Courtroom 960, United States Bankruptcy Court for the Eastern District of New York, Alfonse M. D’Amato U.S. Courthouse, 290 Federal Plaza, Central Islip, New York 11722 (the “Bankruptcy Court”), on February 25, 2026, at 11:30 a.m. (prevailing Eastern Time).

**PLEASE TAKE FURTHER NOTICE** that, in order to attend the Hearing, in accordance with the Bankruptcy Court’s rules and procedures, all parties are required to register for the Hearing at least two (2) business days in advance of the Hearing by using the Court’s eCourt Appearances platform: <https://ecf.nyeb.uscourts.gov/cgi-bin/eCourtAppearances.pl?reginit=ast>. The Court’s relevant rules and procedures for attending the Hearing are set forth more fully at <https://www.nyeb.uscourts.gov/content/chief-judge-alan-s-trust>.

**PLEASE TAKE FURTHER NOTICE THAT** that any responses or objections (“Objections”) to the relief requested in the Motion shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the United States Bankruptcy Court for Eastern District of New York, shall set forth the name of the objecting party, the basis for the objection and the specific grounds therefor, shall be filed with the Bankruptcy Court electronically in accordance with General Order 559 (the “General Order”)

(which can be found at [www.nyeb.uscourts.gov](http://www.nyeb.uscourts.gov)) by registered users of the Bankruptcy Court's case filing system, and shall be served upon counsel for the Plaintiff, Pachulski Stang Ziehl & Jones LLP, 780 Third Avenue, 34th Floor, New York, New York 10017-2024 (Attn.: Jeffrey P. Nolan, Esq.), no later than January 26, 2026 (the "Objection Deadline").

**PLEASE TAKE FURTHER NOTICE THAT IF NO RESPONSES TO THE MOTION ARE TIMELY FILED, SERVED AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE BANKRUPTCY COURT MAY ENTER THE RELIEF REQUESTED BY THE MOTION WITHOUT FURTHER NOTICE OR HEARING.**

Dated: January 9, 2026

PACHULSKI STANG ZIEHL & JONES LLP

*/s/ Jeffrey P. Nolan*

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