

CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT
IN AND FOR HILLSBOROUGH COUNTY, FLORIDA
CIVIL DIVISION

In re:

Laser Spine Institute, LLC	Case No. 2019-CA-2762
CLM Aviation, LLC	Case No. 2019-CA-2764
LSI HoldCo, LLC	Case No. 2019-CA-2765
LSI Management Company, LLC	Case No. 2019-CA-2766
Laser Spine Surgery Center of Arizona, LLC	Case No. 2019-CA-2767
Laser Spine Surgery Center of Cincinnati, LLC	Case No. 2019-CA-2768
Laser Spine Surgery Center of Cleveland, LLC	Case No. 2019-CA-2769
Laser Spine Surgical Center, LLC	Case No. 2019-CA-2770
Laser Spine Surgery Center of Pennsylvania, LLC	Case No. 2019-CA-2771
Laser Spine Surgery Center of St. Louis, LLC	Case No. 2019-CA-2772
Laser Spine Surgery Center of Warwick, LLC	Case No. 2019-CA-2773
Medical Care Management Services, LLC	Case No. 2019-CA-2774
Spine DME Solutions, LLC	Case No. 2019-CA-2775
Total Spine Care, LLC	Case No. 2019-CA-2776
Laser Spine Institute Consulting, LLC	Case No. 2019-CA-2777
Laser Spine Surgery Center of Oklahoma, LLC	Case No. 2019-CA-2780

Assignors,

Consolidated Case No:
2019-CA-2762

To:

Soneet Kapila,

Division L

Assignee,

**ASSIGNEE'S OMNIBUS RESPONSE TO MOTIONS TO
DETERMINE ASSIGNOR'S SELF-INSURANCE COMPLIANCE**

Assignee, Soneet Kapila of KapilaMukamal, as assignee of LSI Management Company, LLC (“**Assignee**”), by and through his undersigned attorneys, files this response to the pending Motions to Determine Assignor’s Self-Insurance Compliance¹ (the “**Motions**”), and states:

1. On March 14, 2019, Laser Spine Institute, LLC and fifteen of its affiliates

¹ Identical motions have been filed by Shirley and John Langston (Dkt. #44); Terry E. Legg and Shirley Legg (Dkt. #47); and Jared William Headley (Dkt. #53), Individually and as parent and Natural Guardian of Caytlin Marie Headley, Brooke Christine Headley, Mackenzie Ann Headley, Nathan Christopher Headley, Madilyn Kay Headley, and Braeden William Headley, minor children.

(collectively, the “**Assignors**”) executed assignments for the benefit of creditors.

2. On March 14, 2019, the Assignee filed Petitions with the Court commencing the above-captioned assignment for the benefit of creditors proceeding pursuant to Section 727 of the Florida Statutes (collectively, the “**Assignment Cases**”).

3. The Assignment Cases are being jointly administered.

4. The Motions seek information as to whether any of the Assignors posted irrevocable letters of creditor under Chapter 675 or escrow accounts under Section 625.53 of the Florida Statutes.

5. The Assignee has not been able to identify any such assets. To the extent the Assignee locates any such assets, he will file an amended response.

/s/ Scott A. Stichter

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing *Assignee's Omnibus Response to Motions to Determine Assignor's Self Insurance Compliance* has been furnished on this 18th day of April, 2019 by the Court's electronic system to all parties receiving electronic service and via electronic mail to:

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/s/ Scott A. Stichter
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