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

In re:

Laser Spine Institute, LLC ¹	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.
5 ,	2019-CA-2762
to	
Soneet Kapila,	Division L
Assignee.	

MOTION TO EXTEND TIME TO FILE PRE-HEARING CONFERENCE REPORT

Assignee, Soneet Kapila of KapilaMukamal, LLP ("Assignee"), by and through his undersigned attorneys, hereby files this Motion to Extend Time to File Pre-Hearing Conference

¹ On April 8, 2019, the Court entered an order administratively consolidating this case with the assignment cases (collectively, the "Assignment Cases" or the "Assignment Estates") of the following entities: LSI Management Company, LLC; Laser Spine Institute Consulting, LLC; CLM Aviation, LLC; Medical Care Management Services, LLC; LSI HoldCo, LLC; Laser Spine Surgical Center, LLC; Laser Spine Surgery Center of Arizona, LLC; Laser Spine Surgery Center of St. Louis, LLC; Laser Spine Surgery Center of Pennsylvania, LLC; Laser Spine Surgery Center of Oklahoma, LLC; Laser Spine Surgery Center of Warwick, LLC; Laser Spine Surgery Center of Cleveland, LLC; Total Spine Care, LLC; and Spine DME Solutions, LLC (collectively, the "Assignors").

Report and states:

- 1. On March 14, 2019, Laser Spine Institute, LLC ("LSI") executed and delivered an assignment for the benefit of creditors to the Assignee. The Assignee filed a Petition with the Court on March 14, 2019, commencing an assignment for the benefit of creditors proceeding pursuant to Section 727 of the Florida Statutes (the "LSI Assignment Case").
- 2. Simultaneous with the filing of the LSI Assignment Case, the Assignee filed fifteen other Petitions commencing assignment for the benefit of creditors proceedings for 15 affiliates of LSI (the "Affiliated Assignment Cases"): LSI Management Company, LLC; Laser Spine Institute Consulting, LLC; CLM Aviation, LLC; Medical Care Management Services, LLC; LSI HoldCo, LLC; Laser Spine Surgical Center, LLC; Laser Spine Surgery Center of Arizona, LLC; Laser Spine Surgery Center of Cincinnati, LLC; Laser Spine Surgery Center of St. Louis, LLC; Laser Spine Surgery Center of Pennsylvania, LLC; Laser Spine Surgery Center of Oklahoma, LLC; Laser Spine Surgery Center of Cleveland, LLC; Laser Spine Surgery Center of Cleveland, LLC; Total Spine Care, LLC; and Spine DME Solutions, LLC (collectively, together with LSI, the "Assignors").
- 3. On March 30, 2021, this Court entered its Order Setting Evidentiary Hearing on April 14, 2021 at 1:30 p.m. (4 Hours) Monthly Motion Calendar Hearing (the "Order"). The Order, among other things, fixed April 7 as the deadline to file the Pre-Hearing Conference Report (the "Report").
- 4. The Laserscopic Claimants have scheduled the deposition of Soneet Kapila, the only witness who will testify at the trial, for April 8, 2021 and desire to complete the deposition before finalizing the Report.

- 5. By this Motion, the Assignee seeks to extend the time to file the Report until April 9, 2021.
 - 6. The Laserscopic Claimants consent to the relief requested in this Motion.

WHEREFORE the Assignee respectfully requests the Court grant the Motion, extend the deadline for filing the Pre-Hearing Conference Report until April 9, 2021, and for such other and further relief as may be just.

/s/ Scott A. Stichter

Scott A. Stichter (FBN 0710679) Edward J. Peterson (FBN 0014612) Stichter, Riedel, Blain & Postler, P.A. 110 E. Madison Street, Suite 200 Tampa, Florida 33602

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing Motion to Extend Time has been sent by either electronic mail on this 7th day of April, 2021 to all parties receiving electronic notice.

/s/ Scott A. Stichter
Scott A. Stichter