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UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
SOUND SHORE MEDICAL CENTER OF  
WESTCHESTER, et al.,

Chapter 11

Case No.: 13-22840 (RDD)

Debtors.  
-----X

**PLAN ADMINISTRATOR'S TWELFTH OBJECTION  
TO ALLOWANCE OF CERTAIN PROOFS OF CLAIM**

**(Unsecured: "Books and Records and/or Insufficient Documentation")**

Monica Terrano, as Plan Administrator (the "Plan Administrator") for the estates of Sound Shore Medical Center of Westchester, and its affiliated debtors (collectively, the "Estate"), by and through her counsel, hereby submits this application (the "Application") for entry of an Order pursuant to 11 USC § 502 and Fed. R. Bankr. P. 3007 reducing certain proofs of claim identified on Exhibit A which do not match the Debtors' books and records and/or which lack sufficient support. In support of the Application, the Plan Administrator represents as follows:

**BACKGROUND**

1. On May 29, 2013 (the "Petition Date"), Sound Shore Medical Center of Westchester, and its affiliates (each a "Debtor" and together the "Debtors"), each filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code") with the United States Bankruptcy Court for the Southern District of New

York (the "Court"). Pursuant to Sections 1107 and 1108 of the Bankruptcy Code, the Debtors continued to administer their affairs as debtors-in-possession.

2. On June 10, 2013, the United States Trustee appointed an Official Committee of Unsecured Creditors (the "Committee"). [Docket No. 67]. The Committee retained Alston Bird, LLP as its counsel. No Trustee or examiner was appointed in these cases.

3. On June 3, 2013, this Court granted an order to employ GCG, Inc. ("GCG"), as the Debtors' Claims and Noticing agent [Docket No. 41].

4. On June 28, 2013, the Debtors filed their respective schedule of assets and liabilities and statement of financial affairs (the "Schedules") [Docket Nos. 125, 127, 129, 131, 133, 135, 137].

5. By order of this Court dated July 25, 2013 (the "Bar Date Order"). [Docket No. 194], with certain exceptions, the general deadline for the filing of proofs of claim against the Debtors was established as September 16, 2013 (the "Bar Date") and the deadline for governmental units to file claims against the Debtors was established as November 25, 2013. On August 9, 2013, the Debtors caused written notice of the Bar Date to be mailed to the Debtors' known and potential creditors [Docket No. 265]. In addition, on August 15, 2013, the Debtors caused notice of the Bar Date to be published in the The New York Times [Docket No. 299].

6. Thereafter, on December 13, 2013, an order was entered establishing January 31, 2014 (the "Administrative Bar Date") as the deadline for the filing of all administrative proofs of claim against the Debtor (the "Administrative Bar Date Order") [Docket No. 490]. On December 19, 2013, the Debtors caused written notice of the Administrative Bar Date to be

mailed to the Debtor's known and potential creditors [Docket No. 516]. Additionally, on December 26, 2013, the Debtors caused notice of the Administrative Bar Date to be published in The New York Times Local Edition [Docket No. 622].

7. On November 6, 2014, the Court entered an Order (the "Confirmation Order") confirming the Debtors' First Amended Plan of Liquidation Under Chapter 11 of the Bankruptcy Code of Sound Shore Medical Center of Westchester, *et al.* (the "Plan") [Docket No. 908]. Pursuant to the Confirmation Order, Monica Terrano has been appointed as Plan Administrator. Pursuant to the Plan, the Plan Administrator has the authority, among other things, to object to claims on behalf of the Estates.

8. On December 9, 2014, the Debtors filed their Notice of (I) Entry of Order Confirming Debtors' First Amended Plan of Liquidation; (II) Occurrence of Effective Date of Plan; (III) Supplemental Administrative Claims Bar Date; (IV) Professional Fee Claims Bar Date; and (V) Bar Date for Proofs of Claim Relating to Executory Contracts Rejected Pursuant to Plan declaring the Plan to be "effective" [Docket No. 940].

### JURISDICTION

9. This Court has jurisdiction over this Application pursuant to 28 U.S.C. § 1408. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(B). The statutory predicates for the relief requested herein are Section 502 of the Bankruptcy Code and Rules 3001 and 3002 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules").

### RELIEF REQUESTED

10. Since the passing of the Bar Date and the Administrative Bar Date, the Plan Administrator, together with her counsel and advisors, has reviewed the Debtors' books and

records to identify objectionable claims. As a result of this review, certain objectionable claims have been uncovered which are addressed by this Twelfth Objection.

11. The claims that are the subject of this Twelfth Objection are those claims which do not match the Debtors' books and records and/or which lack sufficient support.

12. Upon examining the proofs of claim identified on Exhibit A, the Plan Administrator determined that each such unsecured claim does not match the Debtors' books and records and/or the claim lacks sufficient support (the "Books and Records Claims"). As such, the Books and Records Claims must be disallowed and expunged, either in part or in whole.

13. The Debtors thus seek entry of an order or orders pursuant to Section 502 of the Bankruptcy Code and Rule 3001 of the Federal Rules of Bankruptcy Procedure partially disallowing and expunging the Books and Records Claims on Exhibit A.

#### **BASIS FOR RELIEF REQUESTED**

14. Section 502 of the Bankruptcy Code provides, in pertinent part, as follows:

(a) A claim or interest, proof of which is filed, under section 501 of this title, is deemed allowed, unless a party in interest, including a creditor of a general partner in a partnership, that is a debtor in a case under chapter 7 of this title, objects.

11 U.S.C. § 502(a).

15. Pursuant to Bankruptcy Rule 3001(f), a properly executed and filed proof of claim constitutes *prima facie* evidence of the validity and the amount of the underlying claim under section 502(a) of the Bankruptcy Code. *See* Fed. R. Bankr. P. 3001(f). To receive the benefit of *prima facie* validity, however, "the proof of claim must 'set forth facts necessary to support the

claim.”” *In re Chain*, 255 B.R. 278, 280 (Bankr. D.Conn. 2000) (quoting *In re Marino*, 90 B.R. 25, 28 (Bankr. D. Conn. 1988)).

16. As set forth herein, the Plan Administrator has diligently and carefully reviewed and scrutinized each of the proofs of claim filed in this case and has determined that the claims set forth on Exhibit A do not match the Debtors’ books and records and/or lack sufficient documentation. The Plan Administrator thus seeks to reduce each of the objectionable claims identified on Exhibit A.

### **RESERVATION OF RIGHTS**

17. The Plan Administrator reserves all rights to object to any surviving claims asserted against the Debtors, as identified on the annexed exhibits, whether asserted or unasserted by any of the claimants affected by the Application against the Debtors. Should one or more of the objections addressed herein be denied or dismissed, the Plan Administrator reserves her rights to further object to the disputed claim on any other grounds, discovered by the Plan Administrator during the pendency of this case.

### **NOTICE**

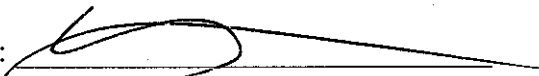
18. Notice of this Twelfth Objection will be given by mailing a copy of this Twelfth Objection and the proposed order to (i) the Office of the United States Trustee for this district, (ii) counsel for the Committee, (iii) each of the claimants listed on Exhibit A, at their respective addresses as set forth on such exhibit, and (iv) each of the entities who have filed a notice of appearance in accordance with Bankruptcy Rule 2002 and all other parties required to be notified under the Case Management Order. In addition, as required under the Order Approving Omnibus Claim Objection Procedures [Docket No. 1036], each claimant whose claim is subject

to this Twelfth Objection has received, in such claimant's respective notice packet, a separate individualized notice informing the claimant that its claim is covered by this Twelfth Objection and that the failure to timely oppose the objection, as set forth in the notice, may result in the grant of the relief requested by this Twelfth Objection.

**WHEREFORE**, the Plan Administrator respectfully requests that the relief requested herein be granted and this Court enter an order, substantially in the form annexed hereto as Exhibit B, and grant such other and further relief as is just and proper.

Dated: Great Neck, New York  
February 12, 2016

GARFUNKEL WILD, P.C.  
Counsel for the Plan Administrator

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*Counsel for the Debtors  
and Debtors-in-Possession*

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

-----X  
In re:

SOUND SHORE MEDICAL CENTER OF  
WESTCHESTER, et al.<sup>1</sup>

Chapter 11  
Case No. 13-22840 (RDD)

Debtors.

(Jointly Administered)

-----X

**DECLARATION OF MONICA TERRANO IN  
SUPPORT OF TWELFTH OMNIBUS OBJECTION TO CLAIMS**

STATE OF NEW YORK)

) ss.:

COUNTY OF NASSAU)

Pursuant to 28 U.S.C. § 1746, I, Monica Terrano, hereby declare:

1. I am the Plan Administrator (“PA”) for the Estate of Sound Shore Medical Center of Westchester, and its debtor affiliates (the “Estate”). In my capacity as the PA, I am authorized to submit this declaration (the “Declaration”) in support of the Estate’s Twelfth Omnibus Objection to Claims (the “Twelfth Objection”)².

<sup>1</sup> The debtors in these chapter 11 cases, along with the last four digits of each debtor’s federal tax identification number include: Sound Shore Health System, Inc. (1398), Sound Shore Medical Center of Westchester (0117), The Mount Vernon Hospital (0115), Howe Avenue Nursing Home, Inc., d/b/a Helen and Michael Schaffer Extended Care Center (0781), NRHMC Services Corporation (9137), The M.V.H. Corporation (1514) and New Rochelle Sound Shore Housing, LLC (0117). There are certain additional affiliates of the Debtors who are not debtors and have not sought relief under Chapter 11.

<sup>2</sup> Capitalized terms, unless herein defined, shall have the meaning ascribed to them in the Omnibus Objection.

2. Except as otherwise indicated, all facts set forth in this Declaration are based upon: (a) my personal knowledge; (b) my review of relevant documents, including Proofs of Claim, (as defined below); (c) my experience and knowledge of the Estate's prior operations, books and records and personnel; and (d) as to matters involving United States bankruptcy law or rules or other applicable laws, my reliance on the advice of counsel or other advisors to the Estate. If called upon to testify, I could and would testify to the facts set forth herein on that basis.

3. I am a Certified Public Accountant with over 17 years of experience in the healthcare industry. Over the past seven years, I have worked primarily on Chapter 11 cases relating to hospital restructurings and/or liquidations. During this time, I have specialized in all aspects of bankruptcy case administration, including claims review and reconciliation, and the preparation of related statements and required schedules and have been focusing primarily on bankrupt hospitals.

#### **CLAIMS ADMINISTRATION PROCESS**

4. Since the expiration of the General Bar Date and Governmental Bar Date, considerable time and effort has been expended by the Estate and its professionals and advisors in connection with the claims administration process to ensure a high level of diligence in reviewing and reconciling hundreds of proofs of claim (the "Proofs of Claim") filed in connection with these Chapter 11 cases. Working directly with the Estates' professionals and advisors, I personally reviewed, analyzed and considered the merits of each Proof of Claim and determined that the claims covered by the Twelfth Objection were subject to objection. Throughout the process, I regularly interfaced with the Estate's professionals and advisors to address potential legal issues impacting the claims.



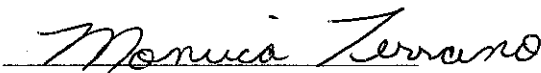
**THE BOOKS AND RECORDS CLAIMS**

5. I am generally familiar with the information contained in the Twelfth Objection. Based on my review of the Proofs of Claim, I assisted the Estate's bankruptcy counsel in the preparation of the Twelfth Objection and related schedules by identifying all claims which did not match the Debtors' books and records and/or which lacked sufficient support for all or part of the claim (the "Books and Records Claims").

6. In evaluating the Books and Records Claims, the Debtors and its advisors reviewed each of the filed proofs of claim (including supporting documentation) and ultimately determined that the amount of the claims did not match the Debtors' books and records and/or the claims lacked support for all or part of the claim. Therefore, I believe that reducing or expunging and disallowing the Books and Records Claims, for the reasons set forth in the Twelfth Objection, is appropriate.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: February 12, 2016  
Great Neck, New York

  
Monica Terrano

**Sound Shore Medical Center of Westchester, et al.,  
Exhibit A - Insufficient Documentation/Books and Records Claims**

SEQ NO.	CLAIMS TO BE MODIFIED				CLAIMED DEBTOR	CLAIMED AMOUNT	MODIFIED AMOUNT/CLASSIFICATION	BASIS FOR OBJECTION
	CLAIM NO.	DATE FILED	NAME	CLAIM NO.				
1	143	8/14/2013	ADVANCED SURGICAL INC 4004 1ST AVE LAFAVETTE HILL, PA 19444	Unsecured: \$67,945.72	Sound Shore Medical Center of Westchester	Unsecured: \$43,010.90	Proof of Claim does not have detailed invoices to agree to amount claimed. Proposed allowed claim based on the Debtors' books.	
2	640	9/13/2013	THE ADVISORY BOARD COMPANY ATTN LEGAL DEPARTMENT 2445 M ST NW WASHINGTON, DC 20037	Unsecured: \$186,475.00	Sound Shore Medical Center of Westchester	Unsecured: \$176,799.00	Proof of Claim does not reflect one payment by the Debtors of \$9,676.00.	
3	968	9/16/2013	BARONE MD, RICHARD P PRESIDENT RASW PC 421 HUGENOT ST NEW ROCHELLE, NY 10801	Unsecured: \$10,000.00	Sound Shore Medical Center of Westchester	Unsecured: \$0.00	Missing supporting documentation for Proof of Claim.	
4	720	9/16/2013	BEACHER RA, MELVIN 50 WEBSTER AVENUE NEW ROCHELLE, NY 10801	Unsecured: \$2,684.00	Sound Shore Medical Center of Westchester	Unsecured: \$0.00	Missing supporting documentation for Proof of Claim.	
5	212	9/19/2013	BEEKLEY CORP 1 PRESTIGE LN BRISTOL CT 06010	Unsecured: \$1,929.00	Sound Shore Medical Center of Westchester	Unsecured: \$0.00	Proof of Claim does not reflect payment of \$1,929.00.	
6	344	8/29/2013	BUTKIS VALERIE 200 THE ESPLANADE N APT C16 VENICE, FL 34265	Secured; Unliquidated Priority; Unliquidated	Sound Shore Medical Center of Westchester	Unsecured: \$0.00	Missing supporting documentation for Proof of Claim.	
7	712	9/16/2013	CASINO MD, JOSEPH E 235 MAIN ST STE 490 WHITE PLAINS, NY 10601	Unsecured: \$4,794.00	Sound Shore Medical Center of Westchester	Unsecured: \$1,474.00	Missing supporting documentation for Proof of Claim.	
8	844	9/16/2013	CHAKRIAN, LEVON 47-20 215TH ST BAYSIDE, NY 11361	Priority: \$13,008.00	Sound Shore Medical Center of Westchester	Priority: \$0.00	Books and records show no amount owed for disability and Proof of Claim has no support for disability owed.	
9	584	9/13/2013	CHILDRENS & WOMENS PHYSICIANS OF WESTCHESTER LLP C/O AKERMAN SENTERFITT LLP ATTN SUSAN F BALASCHAK, ESQ 666 FIFTH AVE 20TH FL NEW YORK, NY 10103	Unsecured: \$692,868.00	Sound Shore Medical Center of Westchester	Unsecured: \$415,068.00	Proof of Claim does not have detailed invoices to agree to amount claimed. Proposed allowed claim based on the Debtors' books.	
10	100	7/13/2013	COMPHEALTH ASSOCIATES INC DBA CHG COMPANIES C/O MEYERS SAXON & COLE 3620 CULBERTIN RD BROOKLYN, NY 11234	Unsecured: \$3,000.00	Sound Shore Medical Center of Westchester	Unsecured: \$0.00	Need supporting documentation for Claim.	
11	980	9/16/2013	COOPER, DAVID PO BOX 3724 MOUNT VERNON, NY 10553	Priority: \$3,768.49	The Mount Vernon Hospital, Inc.	Priority: \$0.00	Proof of Claim does not reflect sick time paid while employee was on workers compensation.	
12	407	8/27/2013	D & D ELEVATOR MAINTENANCE INC 38 HAYES ST ELMSFORD, NY 10523	Secured: \$176,498.35 Unsecured: \$33,802.22	Sound Shore Medical Center of Westchester	Secured: \$0.00 Unsecured: \$51,135.10	Proof of Claim does not reflect payment by the Debtors of \$158,969.47.	
13	163	9/15/2013	DANIEL T CARELLO REALTY 421 HUGENOT ST NEW ROCHELLE, NY 10801	Secured; Unliquidated Priority: \$10,000.00	Blank	Unsecured: \$0.00	Missing supporting documentation for Proof of Claim.	
14	967	9/16/2013	DIAMOND, TARA 80 GUION PL APT 8U NEW ROCHELLE, NY 10801	Priority \$7,000	Howe Avenue Nursing Home, Inc.	Priority: \$0.00	Books and records do not show employee is entitled to retro raise increase-position did not require a license.	
15	107	8/6/2013	EMERGENCY MEDICAL ASSOCIATION-SOUND SHORE PLLC C/O BRACH EICHLER LLC ATTN DAVID J KLEIN, ESQ 101 EISENHOWER PKWY ROSELAND, NJ 07068	Unsecured: \$600,525.42	Sound Shore Medical Center of Westchester	Unsecured: \$410,525.42	Proof of Claim does not reflect a payment by the Debtors of \$190,000.00.	
16	460	9/9/2013	GEBA, VIOLETTA 2868 E 187TH ST BROOKLYN, NY 10461	Priority: \$29,210.25	Sound Shore Medical Center of Westchester	Unsecured: \$0.00	Missing supporting documentation for Proof of Claim.	
17	784	9/16/2013	REALOGICS WOUND CARE & HYPERBARIC SERVICES INC AS THE SUCCESSOR IN INTEREST TO NATIONAL WOUND CARE & HYPERBARIC SERVICES INC C/O AKERMAN SENTERFITT ATTN JOHN B MACDONALD ESQ 50 N LAURA ST STE 3100 JACKSONVILLE, FL 32202	Secured; Unliquidated Unsecured: \$574,178.94	Sound Shore Medical Center of Westchester	Secured: \$0.00 Unsecured: \$416,908.06	Proof of Claim does not have detailed invoices to agree to amount claimed/AP reflects allowed. Proposed allowed claim based on the Debtors' books and records.	
18	232	8/20/2013	KDM MEDICAL EQUIPMENT INC 5507-10 NESCONSET HWY STE 10 PMB 345 MT SINAI, NY 11765	Unsecured: \$148,099.50	Sound Shore Medical Center of Westchester	Unsecured: \$117,146.50	Proof of Claim does not reflect payment by the Debtors of \$30,953.00.	

Note: Claimants are listed alphabetically by last name or by entity name.

**Sound Shore Medical Center of Westchester, et al.,  
Exhibit A - Insufficient Documentation/Books and Records Claims**

Note: Claimants are listed alphabetically by last name or by entity name.

SEQ NO.	NAME	CLAIM NO.	DATE FILED	CLAIMS TO BE MODIFIED		CLAIMED DEBTOR	CLAIMED AMOUNT	MODIFIED AMOUNT/CLASSIFICATION	BASIS FOR OBJECTION
				CLAIM NO.	DATE FILED				
19	LIU, JIANLUN L 16 LOCUST AVE APT 6R NEW ROCHELLE, NY 10801	175	8/16/2013			Sound Shore Medical Center of Westchester	Unsecured; Unliquidated	Unsecured: \$0.00	Missing supporting documentation for Proof of Claim.
20	LOCKWOOD REALTY LLC C/O REICH REICH & REICH PC 235 MAIN ST STE 450 WHITE PLAINS, NY 10601	1353	2/3/2014			Sound Shore Medical Center of Westchester	Unsecured: \$92,572.29	Unsecured: \$70,478.92	Proof of Claim does not reflect payment by the Debtors of \$22,095.00.
21	LUNDEI, RYOIDA 2 FERNDALE PL LARCHMOUNT, NY 10538	746	9/16/2013			Sound Shore Medical Center of Westchester	Priority: \$6,065.00	Priority: \$0.00	Need supporting documentation for Proof of Claim.
22	THE MAX GROUP 7 PONDFIELD ROAD BRONXVILLE, NY 10708	434	9/16/2013			Sound Shore Medical Center of Westchester	Unsecured: \$423,325.00	Unsecured: \$302,194.00	Proof of Claim included a duplicate invoice for \$121,131.00. Proposed allowed claim based on the Debtors' books and records.
23	MCKESSON PHARMACY SYSTEMS INC SOUND SHORE PHARMACY 16 GUION PLACE, GOLDSTEIN PAV NEW ROCHELLE, NY 10802	715	9/16/2013			Sound Shore Medical Center of Westchester	Secured; Unliquidated Priority: \$350,000.00	Secured: \$0.00 Priority: \$0.00	Proof of Claim includes a sale agreement but no basis for asserting a claim. According to Debtors' books and records no amounts are due to claimant.
24	MEDICAL SPECIALTIES DISTRIBUTORS LLC C/O KLEINMAN SALTZMAN & BOLNICK PC 151 N MAIN ST PO BOX 947 NEW CITY, NY 10956	202	7/29/2013			Sound Shore Medical Center of Westchester	Unsecured: \$250,077.44	Unsecured: \$198,627.00	Proof of Claim includes interest of \$51,546.44. There was no calculation provided to support interest calculation included on Proof of Claim.
25	MICHAEL ANTHONY CONTRACTING CORP ATTN: PRESIDENT, MANAGING OR GENERAL AGENT 161 RAILROAD AVE GARDEN CITY PARK, NY 11040	403	9/4/2013			The Mount Vernon Hospital, Inc.	Unsecured: \$461,306.13	Unsecured: \$360,739.73	Proof of Claim does not have detailed invoices to agree to amount claimed. Proposed allowed claim based on the Debtors' books.
26	MOURIS 186 BRIARWOOD DR SOMERS, NY 10589	380	9/3/2013			Howe Avenue Nursing Home, Inc.	Unsecured; Unliquidated	Unsecured: \$0.00	Missing supporting documentation for Proof of Claim.
27	MOURIS, SUSAN 186 BRIARWOOD DR SOMERS, NY 10589	391	9/3/2013			Howe Avenue Nursing Home, Inc.	Unsecured; Unliquidated	Unsecured: \$0.00	Missing supporting documentation for Proof of Claim.
28	NIXON PEARBODY LLP ATTN RICHARD MINICUCCI, ESQ 50 JERICHO QUADRANGLE STE 300 JERICHO, NY 11753	83	7/19/2013			Sound Shore Medical Center of Westchester	Unsecured: \$427,211.30	Unsecured: \$355,663.92	Proof of Claim does not reflect wire paid by the Debtors in the amount of \$71,527.38.
29	NNAEMEKA MD, PETER 140 LOCKWELL AVE NEW ROCHELLE, NY 10801	337	8/28/2013			Sound Shore Medical Center of Westchester	Unsecured: \$27,000.00	Unsecured: \$4,445.00	Proof of Claim does not provide contract to pay for services. Proposed allowed claim based on the Debtors' books and records.
30	ORGANOGENESIS INC PO BOX 84268 BOSTON, MA 02284	649	9/13/2013			The Mount Vernon Hospital, Inc.	Unsecured: \$69,230.95	Unsecured: \$41,112.00	Proof of Claim includes interest of \$28,119. There was no contract provided and no support for interest calculations on Proof of Claim.
31	ORTHO RANGE LTD 49 HALSTED AVE HARRISON, NY 10528	574	09/13/13			Howe Avenue Nursing Home, Inc.	Unsecured: \$93,418.24	Unsecured: \$58,940.25	Proof of Claim includes and no support for the finance charge calculation.
32	ORTHOPRIX INC 3451 PLANO PKWY LEWISVILLE, TX 75066	585	9/13/2013			Sound Shore Medical Center of Westchester	Unsecured: \$68,143.17	Unsecured: \$79,762.24	Proof of Claim does not reflect payments made by the Debtors of \$7,285.34 and \$1,085.59.
33	ORTHOMELIX SURG DESIGNS INC 1065 MEDINA RD STE 800 MEDINA, OH 44256	217	9/19/2013			Sound Shore Medical Center of Westchester	Unsecured: \$7,500.01	Unsecured: \$7,397.10	Proof of Claim includes \$103.00 of sales tax.
34	THE OUTSOURCE GROUP INC ATTN MARK ROWLAND, CHIEF FINANCIAL OFFICER THREE CITY PLACE DR STE 680 ST LOUIS, MO 63141	253	8/22/2013			The Mount Vernon Hospital, Inc.	Unsecured: \$77,203.40	Unsecured: \$71,627.39	Proof of Claim does not reflect a payment made by the Debtors of \$5,676.01.
35	PITI, RICHARD 2523 WESTERVELT AVE BRONX, NY 10469	448	9/7/2013			Blank	Unsecured; Unliquidated	Unsecured: \$0.00	Missing supporting documentation for Proof of Claim. Proposed allowed claim based on the Debtors' books and records.
36	POM RECOVERIES INC ATTN JAMES ARGUITTO 85 E HOFFMAN AVE LINDENHURST, NY 11757	948	9/16/2013			Sound Shore Medical Center of Westchester	Secured; Unliquidated Unsecured: Unliquidated	Unsecured: \$0.00	Missing supporting documentation for Proof of Claim. Proposed allowed claim based on the Debtors' books and records.
37	PROXAIR DISTRIBUTION INC C/O RMS BANKRUPTCY RECOVERY SERVICES PO BOX 5726 TIMONIUM, MD 21084	36	7/11/2013			Sound Shore Medical Center of Westchester	Unsecured: \$58,082.49	Unsecured: \$49,602.49	Proof of Claim does not reflect payment made of \$8,480.19.

**Sound Shore Medical Center of Westchester, et al.,  
Exhibit A - Insufficient Documentation/Books and Records Claims**

CLAIMS TO BE MODIFIED		CLAIMED DEBTOR		CLAIMED AMOUNT	MODIFIED AMOUNT/CLASSIFICATION	BASIS FOR OBJECTION
SEQ NO.	NAME	CLAIM NO.	DATE FILED	CLAIMED AMOUNT	MODIFIED AMOUNT/CLASSIFICATION	BASIS FOR OBJECTION
38	RASHMIKANT, MEHTA 435 OXFORD RD NEW ROCHELLE, NY 10804	845	9/19/2013	Priority: \$17,959.99 Unsecured: \$3,403.28	Priority: \$0.00 Unsecured: \$0.00	Need supporting documentation for claim for pension grandfather claim.
39	RELIANCE INSURANCE COMPANY (IN LIQUIDATION) 75 BROAD ST, 10TH FL NEW YORK, NY 10004	830	9/16/2013	Unsecured: \$144,718.00	Unsecured: \$0.00	Books and records show no amount owed.
40	RIVERA, ANN 1285 WOODSEDGE RD WIND GAP, PA 18091	393	9/9/2013	Priority: Unliquidated	Unsecured: \$0.00	Missing supporting documentation for Proof of Claim.
41	RIVKIN RABIER LLP ATTN STUART J GORDON, ESQ UNIONDALE, NY 11556	31	7/1/2013	Unsecured: \$9,809.78	Unsecured: \$4,627.78	Proof of Claim does not reflect a payment of \$5,182.00.
42	RL MT VERNON PHARMACY INC C/O PENACHIO MALARA LLP 235 MAIN ST WHITE PLAINS, NY 10601	634	9/13/2013	Unsecured: Unliquidated	Unsecured: \$0.00	Proof of Claim includes a sale agreement but no basis for asserting a claim. According to Debtors' books and records no amounts are due to claimant.
43	RUSSELLLO, JOHN 60 LOCUST AVE APT 108 NEW ROCHELLE, NY 11234	160	9/15/2013	Priority: \$617.00	Unsecured: \$0.00	Missing supporting documentation for Proof of Claim.
44	SANDHU, AVA 180 SICKLES AVE NEW ROCHELLE, NY 10801	912	9/16/2013	Priority: \$20,000.00	Priority: \$0.00	Proof of Claim does not have detailed invoices to agree to amount claimed.
45	SANDOVAI, ROSARIO 912 SARA AVE NORTH LEHIGH ACRES, FL 33971	929	9/12/2013	Unsecured: \$71,529.55	Unsecured: \$0.00	Missing supporting documentation for Proof of Claim.
46	SEPS 109 URBAN AVE WESTBURY, NY 11590	282	8/24/2013	Unsecured: \$270.00	Unsecured: \$0.00	Proof of claim does not reflect payment of \$270.
47	SLEEP SERVICES OF AMERICA INC ATTN MICHAEL B BACH 25 WHITNEY DR STE 105 MILFORD, OH 45150	497	9/10/2013	Unsecured: \$27,841.64	Unsecured: \$22,516.52	Proof of Claim does not reflect payment by the Debtors of \$5,325.12.
48	SOUND SHORE MEDICAL CTR FOUNDATION 16 GUION PL NEW ROCHELLE, NY 10802	719	9/16/2013	Unsecured: \$111,754.00	Unsecured: \$0.00	Books and records indicate no payments to Foundation but that Foundation owes Debtor.
49	STEROCYCLE INC PO BOX 6582 CAROL STREAM, IL 60197	247	9/22/2013	Unsecured: \$78,230.22	Unsecured: \$75,763.95	Proof of Claim does not include payment by the Debtors of \$2,466.27.
50	SURGICAL MONITORING ASSOCI 3100 WEST END AVE STE 800 NASHVILLE, TN 37203	505	9/11/2013	Admin: \$2,791.00 503(b)(9): \$2,791.00 Unsecured: \$71,552.00	Admin: \$0.00 503(b)(9): \$0.00 Unsecured: \$0.00	Proof of Claim does not include payments made by the Debtors of \$2,252.00 and \$2,791.00. Remaining claim doesn't agree with books and records.
51	SUTHERLAND HEALTHCARE SOLUTIONS FKA APOLLO HEALTH STREET INC C/O PHILLIPS LYTLE LLP ATTN ALLAN HILL, ESQ 620 18TH AVE FL 23 NEW YORK, NY 10018	516	9/10/2013	Unsecured: \$601,753.58	Unsecured: \$306,285.11	Proof of Claim does not reflect payment by the Debtors of \$295,062.22. Also, Proof of Claim includes \$70,366.00 in late fees. The contract does not provide for late charges.
52	TOYOTA MOTOR CREDIT CORPORATION DBA TOYOTA LEASE TRUST PO BOX 8026 CEDAR RAPIDS, IA 52408	20	6/19/2013	Secured: Unliquidated	Unsecured: \$0.00	Missing supporting documentation for Proof of Claim.
53	TOYOTA MOTOR CREDIT CORPORATION PO BOX 8026 CEDAR RAPIDS, IA 52408	22	6/19/2013	Secured: Unliquidated	Unsecured: \$0.00	Missing supporting documentation for Proof of Claim.
54	NRHMC 342 UNION AVE NEW ROCHELLE, NY 10801	650	9/13/2013	Unsecured: \$60,525.19	Unsecured: \$48,420.13	Proof of Claim does not reflect payment by the Debtors of \$12,105.06.
55	WEILL CORNELL MEDICAL COLLEGE 520 E 70TH ST ST 465 NEW YORK, NY 10021	545	9/12/2013	Unsecured: \$39,886.40	Unsecured: \$24,898.40	Proof of Claim does not reflect a payment by the Debtors of \$13,888.00.
56	WOLF HALDENSTEIN ADLER 270 MADISON AVENUE NEW YORK, NY 10016	146	8/14/2013	Unsecured: \$26,099.16	Unsecured: \$17,722.85	Proof of Claim does not reflect a payment by the Debtors of \$8,376.32.

Note: Claimants are listed alphabetically by last name or by entity name.

**Sound Shore Medical Center of Westchester, et al.,  
Exhibit A - Insufficient Documentation/Books and Records Claims**

Note: Claimants are listed alphabetically by last name or by entity name.

SEQ NO.	NAME	CLAIMS TO BE MODIFIED			CLAIMED DEBTOR	CLAIMED AMOUNT	MODIFIED AMOUNT/CLASSIFICATION	BASIS FOR OBJECTION
		CLAIM NO.	DATE FILED					
57	WOMEN MEDICAL WELLNESS 100 STEVENS AVE FL 7 MOUNT VERNON, NY 10550	248	8/22/2013	The Mount Vernon Hospital, Inc.	Priority: \$151,590.18	Priority: \$0.00	Proof of claim does not reflect payment of \$151,590.18.	
58	ZIMMET HEALTHCARE SERVICES GROUP LLC C/O ZIMMET BIBBER LLP ATTN BRIAN J ZIMMET, ESQ 437 MADISON AVE 40TH FL NEW YORK, NY 10022	73	7/22/2013	Sound Shore Medical Center of Westchester	Unsecured: \$213,471.01	Unsecured: \$140,038.51	Proof of Claim does not have detailed invoices to agree to amount claimed. Proposed allowed claim based on the Debtors' books.	
59	ZOMBACK, ELLEN 89 ROBERT DR NEW ROCHELLE, NY 10804	204	8/19/2013	The Mount Vernon Hospital, Inc.	Admin: \$450.00 503(b)(9): \$450.00 Unsecured: \$1,250.00	Admin: \$0.00 503(b)(9): \$0.00 Unsecured: \$990.00	Proof of Claim does not reflect payment by the Debtors of \$720.00.	

Any 503(b)(9) amount is included in the Admin amount as a subset.

**EXHIBIT B**

**PROPOSED ORDER**

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

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In re:

SOUND SHORE MEDICAL CENTER OF  
WESTCHESTER, et al.

Chapter 11  
Case No. 13-22840 (RDD)

Debtors.

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(Jointly Administered)

**ORDER GRANTING TWELFTH OMNIBUS OBJECTION TO CLAIMS**

THIS MATTER having come before the Court upon the motion of the Plan Administrator appointed in these cases (the "Motion")<sup>1</sup> for entry of an order pursuant to 11 U.S.C. § 502 and Rule 3007 of the Federal Rules of Bankruptcy expunging, disallowing, or reducing each of the proofs of claim listed on Exhibit A attached hereto, on the basis that they do not match the Debtors' books and records and/or lack sufficient support; the Court having reviewed the Twelfth Objection; and notice having been provided (i) to the claimants listed on Exhibit A at the addresses set forth on the claimants' respective proofs of claim, (ii) counsel for the Committee, and (iii) the Office of the United States Trustee; and no response having been filed thereto; and the Court having jurisdiction to consider the Twelfth Objection; and the Twelfth Objection having come before the Court for a hearing held on March 16, 2016 (the "Hearing"); and upon the record made before the Court on that date; and the Court having found that the relief requested in the Twelfth Objection is in the best interest of the Debtors' estate, creditors and other parties in interest; and it appearing that sufficient notice of the Twelfth Objection has been given, and the Court having determined that the legal and factual basis set forth in the Twelfth Objection establish cause for the relief granted herein; and after due

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<sup>1</sup> Unless otherwise defined, capitalized terms used herein shall have the meanings ascribed to them in the Motion

deliberation and consideration of the Motion having been had; and it appearing that good and sufficient cause exists for granting the Twelfth Objection, it is hereby

**ORDERED**, that the relief requested in the Twelfth Objection is GRANTED to the extent set forth below and upon the terms and conditions set forth herein; and it is further

**ORDERED**, that the Claims listed on Exhibit A, as attached hereto, are hereby expunged and disallowed or reduced to the extent noted on Exhibit A; and it is further

**ORDERED**, that the Debtors' claims and noticing agent, Garden City Group, LLC., and the Clerk of this Court are authorized to take any and all actions that are necessary or appropriate to give effect to this Order; and it is further

**ORDERED**, that this Court shall retain jurisdiction over any and all issues arising from or related to the implementation and interpretation of this Order.

Dated: March \_\_\_\_, 2016  
White Plains, New York

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HONORABLE ROBERT D. DRAIN  
UNITED STATES BANKRUPTCY JUDGE



Hearing Date: March 16, 2016 at 10:00 a.m. (Prevailing Eastern Time)  
Objection Deadline: March 9, 2016 at 4:00 p.m. (Prevailing Eastern Time)

GARFUNKEL WILD, P.C.  
*Counsel for the Plan Administrator and Estate*  
111 Great Neck Road  
Great Neck, New York 11021  
Phone: 516.393-2200  
Fax: 516.466-5964  
Burton S. Weston  
Adam T. Berkowitz  
Phillip Khezri

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

-----x  
In re:

SOUND SHORE MEDICAL CENTER OF  
WESTCHESTER, et al<sup>1</sup>,  
  
Debtors.

Chapter 11 Case  
  
No. 13-22840 (RDD)  
(Jointly Administered)

-----x  
**THE OMNIBUS CLAIMS OBJECTION LISTED BELOW SEEKS TO  
DISALLOW AND EXPUNGE, REDUCE, AND/OR RECLASSIFY CERTAIN FILED  
PROOFS OF CLAIM.**

**YOU ARE RECEIVING THIS NOTICE BECAUSE YOUR CLAIM IS  
COVERED BY THE TWELFTH OMNIBUS OBJECTION. YOUR FAILURE  
TO TIMELY OPPOSE THE RELIEF SOUGHT HEREIN MAY RESULT IN  
THE GRANTING OF THE RELIEF REQUESTED BY THIS OBJECTION.**

**NOTICE OF PLAN ADMINISTRATOR'S TWELFTH OMNIBUS  
OBJECTION TO UNSECURED CLAIMS THAT DO NOT MATCH THE DEBTORS'  
BOOKS AND RECORDS AND/OR WHICH LACK SUFFICIENT SUPPORT**

**PLEASE TAKE NOTICE**, that a hearing on the annexed Twelfth Omnibus Objection to  
Claims, dated February 12, 2016 (the "Twelfth Omnibus Objection"), of the Post Confirmation

<sup>1</sup> The debtors in these chapter 11 cases, along with the last four digits of each debtor's federal tax identification number include: Sound Shore Health System, Inc. (1398), Sound Shore Medical Center of Westchester (0117), The Mount Vernon Hospital (0115), Howe Avenue Nursing Home, Inc., d/b/a Helen and Michael Schaffer Extended Care Center (0781), NRHMC Services Corporation (9137), The M.V.H. Corporation (1514) and New Rochelle Sound Shore Housing, LLC (0117). There are certain additional affiliates of the Debtors who are not debtors and have not sought relief under Chapter 11.

Estate of Sound Shore Medical Center of Westchester, et al. (the "Estate"), will be held before the Honorable Robert D. Drain, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York (the "Court"), 300 Quarropas Street, White Plains, New York, on the 16th day of March 2016 at 10:00 a.m. or as soon thereafter as counsel may be heard seeking the relief set forth on Exhibit A to the Twelfth Omnibus Objection.

**ALL PARTIES RECEIVING THIS NOTICE SHOULD REVIEW THE TWELFTH OMNIBUS OBJECTION CAREFULLY TO DETERMINE IF A RESPONSE IS REQUIRED. THE FAILURE TO TIMELY FILE A RESPONSE OR OTHERWISE OPPOSE THE OBJECTION MAY RESULT IN THE GRANTING OF THE RELIEF.**

**PLEASE TAKE FURTHER NOTICE** that responses if any, to the proposed Twelfth Omnibus Objection (the "Responses") shall be made in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules for the Southern District of New York, shall state with particularity the grounds upon which such Response is based, and shall be filed with the Bankruptcy Court, in electronic format in accordance with General Order M-399, by utilizing the Court's electronic case filing system at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov), or if the same cannot be filed electronically, by manually filing same with the Clerk of the Court together with a cd-rom containing same in Word, Wordperfect or PDF format, with a hard copy provided to the Clerk's Office at the Bankruptcy Court for delivery to the Chambers of the Honorable Robert D. Drain and served on (i) Garfunkel Wild, P.C., 111 Great Neck Road, Great Neck, New York 11021, Attention: Burton S. Weston, Esq., Adam T. Berkowitz, Esq., and Phillip Khezri, Esq., counsel to the Plan Administrator; (ii) Alston & Bird LLP, 90 Park Avenue, New York, New York 10016 Attention: Martin G. Bunin, Esq. and Craig E. Freeman, Esq., counsel to the Committee;

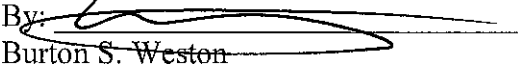
and (iii) the Office of the United States Trustee for this district so as to be received by all such parties no later than 4:00 p.m. (Prevailing Eastern Time) on March 9, 2016.

**PLEASE TAKE FURTHER NOTICE** that if no Responses are timely filed and served with respect to the Twelfth Omnibus Objection, the Estate may, on or after the Objection Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed order annexed to the Twelfth Omnibus Objection, which order may be entered with no further notice or opportunity to be heard.

**PLEASE TAKE FURTHER NOTICE** you may obtain copies of a proof of claim from the website maintained by the Debtors' noticing and claims agent, Garden City Group, LLC ("GCG") at <http://www.gcginc.com/cases/soundshore>. You can search for the desired proof of claim using the Claimant's name or the claim number. If you do not have access to the Internet, you can request a copy of any proof of claim, pleading or service list from GCG by calling the Sound Shore Medical Center's Information line at 866-300-1288.

**PLEASE TAKE FURTHER NOTICE** that the hearing on the Twelfth Omnibus Objection may be adjourned without further notice except as announced in open court on the Hearing Date, or at any adjourned hearing.

Dated: Great Neck, New York  
February 12, 2016

GARFUNKEL WILD, P.C.  
*Counsel for the Plan Administrator and Estate*  
By:   
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