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[Proposed] General Insolvency Counsel for
ADVANCE SPECIALTY CARE, LLC
Debtor and Debtor In Possession

UNITED STATES BANKRUPTCY COURT

CENTRAL DISTRICT OF CALIFORNIA [LOS ANGELES DIVISION]

In re:	**Case No. 2:17-bk-24737-RK**
ADVANCE SPECIALTY CARE, LLC,	**Chapter 11**
Debtor.	**MOTION FOR ORDER AUTHORIZING DEBTOR AND DEBTOR IN POSSESSION TO USE CASH COLLATERAL; MEMORANDUM OF POINTS AND AUTHORITIES; DECLARATION(S) AND EXHIBIT(S) IN SUPPORT THEREOF**
	["Application For Order Setting Hearing On Shortened Notice [LBR 9075-1(b)]," filed concurrently]
	Date: [To Be Scheduled] **Time:** **Place: Courtroom 1675** **Roybal Federal Building** **United States Bankruptcy Court** **255 East Temple Street** **Los Angeles, California 90012**

TO THE HONORABLE ROBERT N. KWAN, UNITED STATES BANKRUPTCY JUDGE:

Advance Specialty Care, LLC, the chapter 11 debtor and debtor in possession in the above captioned case ("Advance Specialty Care" or "Debtor") submits this "Motion For Order Authorizing Debtor And Debtor In Possession To Use Cash Collateral" ("Cash Collateral Motion").

This Cash Collateral Motion is based on the following facts and circumstances. Debtor caused to be filed a voluntary petition for reorganization under chapter 11 of Title 11 of the United States Code on November 30, 2017. Debtor is in the business of providing home health care services. Specifically, Debtor employs nurses and other trained individuals who go to patients' homes to provide post hospitalization medical services. Debtor requires an order from this Court authorizing the use of cash collateral generated by the Debtor's business, in which the Department of the Treasury - Internal Revenue Service and the State of California Employment Development Department holds one or more tax liens, for Debtor's ordinary and necessary operating expenses and administration of its chapter 11 bankruptcy estate, pending issuance of a further order of the Court or a confirmed plan of reorganization.

This Cash Collateral Motion is made pursuant to Bankruptcy Code section 363(c)(2), Rules 4001(b), 6003 and 6004 of the Federal Rules of Bankruptcy Procedure, and Local Bankruptcy Rules 2081-1(a)(9), 4001-2 and 9075-1, and is supported by the attached memorandum of points and authorities, declaration(s) and exhibit(s) appended thereto, all documents and pleadings on file with the Court in this case, and upon such other evidence and argument as the Court may consider at the hearing of this Cash Collateral Motion.

PLEASE TAKE NOTICE that pursuant to Rule 4001(b)(1) of the Federal Rules of Bankruptcy Procedure:

> (A) motion for authority to use cash collateral shall be made in accordance with Rule 9014 and shall be accompanied by a proposed form of order.
>
> (B) the motion shall consist of or (if the motion is more than five pages in length) begin with a concise statement of the relief requested, not to exceed five

pages, that lists or summarizes, and sets out the location within the relevant documents of, all material provisions, including:

(i) the name of each entity with interest in the cash collateral;

(ii) the purpose of the use of the cash collateral;

(iii) the material terms, including duration of the use of the cash collateral; and

(iv) any liens, cash payments, or other adequate protection that will be provided to each entity with an interest in the cash collateral or, if no adequate protection is proposed, an explanation as to why each entity's interest is adequately protected.

WHEREFORE, Advance Specialty Care, LLC respectfully requests that the Court issue an order authorizing it to use the cash collateral generated by its business on the terms and conditions described in the "Motion For Order Authorizing Debtor And Debtor In Possession To Use Cash Collateral" until issuance of a further order from the Court or a confirmed plan of reorganization, and for such other and further relief as is just and proper.

Dated: December 19, 2017

LAW OFFICES OF RAYMOND H. AVER
A Professional Corporation

By:_____
RAYMOND H. AVER
[Proposed] General Insolvency Counsel for
ADVANCED SPECIALTY CARE, LLC
Debtor and Debtor In Possession

MEMORANDUM OF POINTS AND AUTHORITIES

I.

BACKGROUND FACTS

Nature Of Debtor's Business

Advance Specialty Care ("Advance Specialty Care" or "Debtor") is a California limited liability company. Advance Specialty Care is engaged in the business of providing home health care services. Specifically, Debtor employs nurses and other trained individuals who go to patients' homes to provide post hospitalization medical services.

In order for Debtor to continue operating its business, it requires immediate use of the cash collateral in which the Department of the Treasury - Internal Revenue Service ("IRS") and the State of California Employment Development Department ("EDD") has or may claim one or more tax liens.

Commencement Of The Bankruptcy Case

Debtor caused to be filed its voluntary petition under chapter 11 of Title 11 of the United States Code ("Bankruptcy Code") on November 30, 2017 ("Petition Date").[1]

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[1] On March 19, 2016, Advance Speciality Care caused to be filed a voluntary petition for reorganized under chapter 11 of the Bankruptcy Code, *In re Advance Specialty Care, LLC*, Case No. 2:16-bk-13521-RK ("Prior Bankruptcy Case"). During the pendency of the Prior Bankruptcy Case, the Court approved Debtor's emergency motion for cash collateral usage as well as a stipulation between Debtor and the IRS for adequate protection and use of cash collateral. The Prior Bankruptcy case was dismissed on or about June 15, 2016, pursuant to "Order Approving Stipulation To Dismiss Case Under 11 U.S.C. §1112(b)(1) Without A Refiling Bar."

Following dismissal of the Prior Bankruptcy Case, Advance Specialty Care negotiated a repayment plan with the IRS pursuant to which Advance Specialty Care was required to make payments to the IRS in the sum of $15,000 per month, effective September 20, 2017. However, Advance Specialty Care's ability to comply

Since the Petition Date, Debtor has continued to operate its business as a debtor in possession pursuant to Sections 1107(a) and 1108 of the Bankruptcy Code.

IRS Tax Lien

According to the Proof Of Claim filed on behalf of the IRS on December 6, 2017 ("IRS POC"), the IRS has a secured tax claim in the amount of $1,777,333.87.[2] A true and correct copy of the IRS POC is attached as **Exhibit A** to the Declaration of Moises L. Simbulan ("Simbulan Declaration"), appended hereto. The secured lien of the IRS attaches to all of Debtor's personal property, including funds in its bank accounts and accounts receivable.

Advance Specialty Care's Ordinary And Necessary Expenses

As set forth in the "Projected Cash Flow Statement For The First 90 Day Period" ("Budget"), Debtor's average expenses are projected to total $497,085.40 per month, and includes such ordinary and necessary operating expenses as rent, accounting fees, salaries and wages, insurance, marketing, supplies, and taxes, and other ordinary and necessary expenses. These expenses are more specifically identified

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with the terms of the repayment plan was affected by certain changes within California Department of Health Services ("Medi-Cal") that took place around July 2017. These changes affected the turnaround time for treatment authorization requests ("TAR") approvals for Medi-Cal patients. For example, 25 out of 60 Advance Speciality Care's patients have pending TAR approvals since August 2017, which patients have been continuously receiving services from Advance Specialty Care due to the sensitive nature of their medical conditions. Advance Specialty Care believes the problem has been recognized by Medi-Cal and Medi-Cal is taking steps to expedite processing of the requests. Advance Specialty Care paid approximately $900,000 in payroll taxes to the IRS through the second quarter of 2017, and was also able to pay approximately $70,000 to the EDD through the second quarter of 2017.

[2] The total amount of the IRS claim is $2,422,646.20 according to the IRS Proof Of Claim.

in the Budget attached as **Exhibit B** to the Simbulan Declaration.

II.

LEGAL ANALYSIS

A. This Court Has The Authority To Authorize Debtor's Use Of Cash Collateral

Cash collateral is defined as "cash, negotiable instruments, documents of title, securities, deposit accounts, or other cash equivalents whenever acquired in which the estate and an entity other than the estate have an interest ..." [11 U.S.C. § 363(a)] The income in Debtor's bank accounts and its account receivables in which the IRS claims or may claim a security interest, constitute "cash collateral" within the meaning of 363(a) of the Bankruptcy Code.

Section 363(c)(2) of the Bankruptcy Code permits the use of cash collateral only if either "each entity that has an interest in such cash collateral consents; or the court, after notice and a hearing, authorizes" such use of cash collateral. Therefore, this Court has the explicit authority under the Bankruptcy Code to authorize the use of monies in Debtor's bank accounts and its account receivables to pay Debtor's ordinary and necessary operating expenses until issuance of a further order of the Court or a confirmed plan of reorganization.

B. Debtor Should Be Authorized To Use The Cash In Its Bank Accounts And Its Accounts Receivable To Pay Its Ordinary And Necessary Expenses

The Court may authorize the use of cash collateral for ordinary and necessary operating expenses and expenses of administration if the Court determines that the "interest" of the creditors holding

liens on the subject property will remain "adequately protected." [11 U.S.C. § 363(e).

Although "adequate protection" is not defined in the Bankruptcy Code, section 361 provides that adequate protection can be provided in the form of (a) periodic cash payments; (b) additional replacement liens to the extent the "use" results in the decrease in the value of the creditor's interest in the property; (c) granting such other relief as will provide the "indubitable equivalent" of the creditor's interest in the property. [11 U.S.C. § 361; *See also In re Aurora Cord & Cable Co, Inc.*, 2 B.R. 342, 346-7 (Bankr. N.D. Ill. 1980) (examining adequate protection in the contest of the IRS's interest in property of the debtor's bankruptcy estate)] "Thus, the bankruptcy court is given the authority to provide alternate means for protecting creditors' interests during the rehabilitation of the debtor while insuring that the creditor 'receives in value essentially what he bargained for.'" [*See Aurora Cord & Cable Co,* 2 B.R. at 346] While 11 U.S.C. § 361 provides some forms of adequate protection, the list is not exhaustive or exclusive. [*Id.*]

Debtor submits that the interests of the IRS and EDD are adequately protected because, as set forth in the Budget, the use of the postpetition gross income generated by Debtor's business is projected to result in a net profit to Debtor every month. To the extent the Court determines that the interests of the IRS and/or the EDD are not adequately protected, Debtor can provide a replacement lien on after acquired assets, such as accounts receivable, to the extent the use of cash collateral results in a decrease of value of the tax collectors' interest in the property and/or periodic cash payments in an amount to be determined by the Court. Therefore, the

Court should authorize Debtor's use of the cash collateral until issuance of a further order of the Court or a confirmed plan of reorganization.

C. Debtor Should Be Authorized To Use Its Income To Pay Ordinary And Necessary Expenses Because That Will Promote Reorganization And Will Benefit Creditors, Debtor, And The Bankruptcy Estate

The ultimate goal of a chapter 11 case is to enhance the prospects of reorganization. [*In re O'Connor*, 808 F.2d 1393, 1397-98 (10th Cir. 1987)] In order to encourage the debtor's efforts in the formative period prior to the proposal of a reorganization plan, the court must be flexible in applying the adequate protection standard. [*Id.*] Likewise, in *In re Cann & Saul Steel Co.*, 76 B.R. 479, 487 (Bankr. E.D. Pa. 1987), the court found cause for "cautious optimism that the debtor will be able to present a confirmable plan which will result in the betterment of the financial status of all of its creditors" was a considerable factor in establishing adequate protection.

Authorizing the use of cash collateral in Debtor's bank accounts and accounts receivable to pay ordinary and necessary expenses of Debtor's business and the administrative expenses of the bankruptcy estate is likely to promote a successful reorganization and will ultimately be beneficial to all parties in interest. There is a great likelihood that Debtor will be able to successfully reorganize if it is allowed to use its cash and accounts receivable to pay its business expenses and continue operating its business uninterrupted. In fact, Debtor has already taken steps to ensure a successful reorganization by adding a new service - intermittent visits for

geriatrics, and has enlisted the services of marketers to promote such service with doctors, skilled nursing facilities, and rehabilitation centers. In addition, Debtor's management have decided to utilize a professional payroll service, Paychex Incorporated, to deduct and pay all payroll taxes before releasing payroll checks to Debtor's employees in an effort to address a significant prepetition tax payment issue.

If Debtor's access to cash collateral is interrupted for even a brief period of time, however, the consequences could be disastrous; Debtor will not be able to effectively operate its business, it will likely lose clients and its sources of income, and Debtor's prospects for a successful reorganization will likely be irreparably harmed. At a minimum, Debtor must immediately pay the following expenses which were due on or before the first of the month:

a.	Central Plaza, LLC (Rent)	$ 4,888.50
b.	IPFS Corporation (Worker's Compensation Insurance)	$ 15,029.55
c.	IPFS Corporation (General Liability Insurance)	$ 2,367.55
d.	Toyota Financial Services (Auto: loan payment)	$ 297.02
e.	Philadelphia Indemnity Insurance Company (Auto: insurance premium)	$ 282.16
f.	Data Soft Logic (Outside Services: i.t. billing software)	$ 1,350.00
g.	AerioConnect (Outside Services: telephone and internet system)	$ 1,452.00
h.	RMS Querubin (Marketing: Medi-Care program)	$ 4,500.00
I.	MP Diversified Business (Marketing: Medi-Care program)	$ 3,250.00
j.	LV Medical Management (Outside Services: technical support)	$ 3,000.00
k.	Salaries & Wages (95 employees, including withholding taxes)	$164,069.06
l.	Salaries & Wages (34 independent contractors)	$ 36,884.79

Debtor will have sufficient funds on deposit, of more

than $300,000.00 by no later than Wednesday, December 27, 2017, to pay these critical expenses.

D. The Cash Collateral Motion Complies With The Requirements Set Forth In Local Bankruptcy Rule 4001-2(a) And Federal Rule Of Bankruptcy Procedure 4001(b)(1)(A)

Local Bankruptcy Rule ("LBR") 4001-2(a) provides that:

> Each motion to obtain credit or to approve the use of cash collateral, debtor in possession financing, and/or cash management under 11 U.S.C. §§ 363 or 364, or related stipulation (collectively, "Financing Motion") must be accompanied by mandatory court-approved form F 4001-2.STMT.FINANCE.

Attached as **Exhibit C** to the declaration of Raymond H. Aver ("Aver Declaration") appended hereto, is a true and correct copy of form F 4001-2.STMT.FINANCE. It should be noted that none of the boxes are checked on the form because the proposed form of order, discussed below, does not contain any of the provisions listed in the form required by the LBR.

Federal Rule of Bankruptcy Procedure ("FRBP") 4001(b)(1)(A) provides that a "motion for authority to use cash collateral shall be made in accordance with Rule 9014 and shall be accompanied by a proposed form of order." A true and correct copy of the proposed form of order is attached as **Exhibit D** to the Aver Declaration.

III.

CONCLUSION

Based upon the facts, circumstances and authorities set forth above, Advance Specialty Care, LLC respectfully requests the Court authorize the use of cash collateral on the terms and conditions

described in the Cash Collateral Motion until issuance of a further order from the Court or a confirmed plan of reorganization, and for such other and further relief as is just and proper.

Dated: December 19, 2017

LAW OFFICES OF RAYMOND H. AVER
A Professional Corporation

By: _____
RAYMOND H. AVER
[Proposed] General Insolvency Counsel for
ADVANCED SPECIALTY CARE, LLC
Debtor and Debtor In Possession

DECLARATION OF MOISES L. SIMBULAN

I, MOISES L. SIMBULAN, declare:

1. I am the chief financial officer ("CFO") of Advance Specialty Care, LLC ("Advance Specialty Care" or "Debtor"), the chapter 11 debtor and debtor in possession, proceeding before the United States Bankruptcy Court for the Central District of California [Los Angeles Division] under *In re Advance Specialty Care, LLC*, Case No. 2:17-bk-24737-RK. My wife, Felina D. Simbulan, the Chief Executive Officer of Debtor, and I are the individuals designated to act on behalf of Debtor in all matters pertaining to its bankruptcy case.

Nature Of Debtor's Business

2. Advance Specialty Care is a California limited liability company. Advance Specialty Care is engaged in the business of providing home health care services. Specifically, Debtor employs nurses and other trained individuals who go to patients' homes to provide post hospitalization medical services.

3. In order for Debtor to continue operating its business, it requires immediate use of the cash collateral in which the Department of the Treasury - Internal Revenue Service ("IRS") and the Employment Development Department ("EDD") has or may claim a security interest.

Commencement Of The Bankruptcy Case

4. Debtor caused to be filed its voluntary petition under chapter 11 of Title 11 of the United States Code ("Bankruptcy Code")

on November 30, 2017 ("Petition Date").[3]

5. Since the Petition Date, Debtor has continued to operate its business.

IRS Tax Lien

6. According to the Proof Of Claim filed on behalf of the IRS on December 6, 2017 ("IRS POC"), the IRS has a secured tax claim in the amount of $1,777,333.87.[4] A true and correct copy of the IRS POC is attached as **Exhibit A** hereto.

Advance Specialty Care's Ordinary And Necessary Expenses

7. As set forth in the "Projected Cash Flow Statement For The First 90 Day Period" ("Budget"), Debtor's average expenses are projected to total $497,085.40 per month, and include such ordinary

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[3] On March 19, 2016, Advance Speciality Care filed a chapter 11 voluntary petition, commencing a bankruptcy case, *In re Advance Specialty Care, LLC*, Case No. 2:16-bk-13521-RK ("Prior Bankruptcy Case"). During the pendency of the Prior Bankruptcy Case, the Court approved Debtor's emergency motion for cash collateral usage as well as a stipulation between Debtor and the IRS for adequate protection and use of cash collateral. The Prior Bankruptcy case was dismissed on or about June 15, 2016, pursuant to "Order Approving Stipulation To Dismiss Case Under 11 U.S.C. §1112(b)(1) Without A Refiling Bar."

Following dismissal of the Prior Bankruptcy Case, Advance Specialty Care negotiated a repayment plan with the IRS pursuant to which Advance Specialty Care was required to make payments to the IRS in the sum of $15,000 per month, effective September 20, 2017. However, Advance Specialty Care's ability to comply with the terms of the repayment plan was affected by certain changes within California Department of Health Services ("Medi-Cal") that took place around July 2017. These changes affected the turnaround time for treatment authorization requests ("TAR") approvals for Medi-Cal patients. For example, 25 out of 60 Advance Speciality Care's patients has pending TAR approvals since August 2017, which patients have been continuously receiving services from Advance Specialty Care due to the sensitive nature of their medical conditions. Advance Specialty Care believes the problem has been recognized by Medi-Cal and Medi-Cal is taking steps to expedite processing of the requests. Advance Specialty Care paid approximately $900,000 in payroll taxes to the IRS through the second quarter of 2017. Advance Specialty Care was also able to pay approximately $70,000 to the EDD through the second quarter of 2017.

[4] The total amount of the IRS claim is $2,422,646.20 according to the IRS Proof Of Claim.

and necessary operating expenses as rent, accounting fees, salaries and wages, insurance, marketing, supplies, and taxes, and other ordinary and necessary expenses. These expenses are more specifically identified in the Budget attached as **Exhibit B** hereto.

8. I believe the interest of the IRS is adequately protected because, as set forth in the Budget, prepared by Felina D. Simbulan, Debtor's accountant and me, based upon Debtor's historical performance, the use of the postpetition gross income generated by Debtor's business is projected to result in a net profit to Debtor every month. To the extent the Court determines that the interest of the IRS is not adequately protected, Debtor can provide a replacement lien on after acquired assets, such as accounts receivable, to the extent the use of cash collateral results in a decrease in value of the IRS's interest in the property and/or periodic cash payments in an amount to be determined by the Court.

9. Authorizing the use of cash collateral in Debtor's bank accounts and accounts receivable to pay ordinary and necessary expenses of Debtor's business and the administrative expenses of the bankruptcy estate is likely to promote a successful reorganization and will ultimately be beneficial to all parties in interest. There is a great likelihood that Debtor will be able to successfully reorganize if it is allowed to use its cash and account receivables to pay its business expenses and continue operating its business uninterrupted. In fact, Debtor has already taken steps to ensure a successful reorganization by adding a new service - intermittent visits for geriatrics, and has enlisted the services of marketers to promote such service with doctors, skilled nursing facilities, and rehabilitation centers. In addition, Debtor's management have

decided to utilize its payroll service, Paychex Incorporated, to deduct and pay all payroll taxes before releasing payroll checks to Debtor's employees in an effort to address a significant prepetition tax payment issue.

10. The justification for filing this motion on an expedited basis is that Debtor needs to immediately pay its ordinary and necessary business expenses. If Debtor's access to cash collateral is interrupted for even a brief period of time, the consequences could be disastrous. Debtor will not be able to effectively operate its business, it will likely lose clients and its sources of income, and Debtor's prospects for a successful reorganization will likely be irreparably harmed. At a minimum, Debtor must immediately pay the following expenses which are due on or before the first of the month:

a.	Central Plaza, LLC (Rent)	$ 4,888.50
b.	IPFS Corporation (Worker's Compensation Insurance)	$ 15,029.55
c.	IPFS Corporation (General Liability Insurance)	$ 2,367.55
d.	Toyota Financial Services (Auto: loan payment)	$ 297.02
e.	Philadelphia Indemnity Insurance Company (Auto: insurance premium)	$ 282.16
f.	Data Soft Logic (Outside Services: i.t. billing software)	$ 1,350.00
g.	AerioConnect (Outside Services: telephone and internet system)	$ 1,452.00
h.	RMS Querubin (Marketing: Medi-Care program)	$ 4,500.00
I.	MP Diversified Business (Marketing: Medi-Care program)	$ 3,250.00
j.	LV Medical Management (Outside Services: technical support)	$ 3,000.00
k.	Salaries & Wages (95 employees, including withholding taxes)	$164,069.06
l.	Salaries & Wages (34 independent contractors)	$ 36,884.79

11. Debtor will have sufficient funds on deposit, of in excess of $300,000.00 by no later than Wednesday, December 27,

2017, to pay these critical expenses. Debtor currently has $120,861.39 on deposit in its debtor in possession account and is expecting two payments of $87,906.15 and $109,200.88 from Medi-Cal. The $87,906.15 payment from Medi-Cal was sent to Debtor's prepetition bank account at Citibank through the Automated Clearinghouse system ("ACH") but could not be processed because the account had been closed and a debtor in possession account opened at Wells Fargo Bank. The payment was mailed on Monday, December 18, 2017 and should be received by Debtor by Thursday, December 21, 2017. The $109,200.88 payment is due to be mailed by Med-Cal to Debtor on Thursday, December 21, 2017 and is expected to be received by Debtor on Wednesday, December 27, 2017.

12. I have personal knowledge of the facts stated herein, except where stated on information and belief, and where so stated, I am informed and believe that such facts are true and correct. If called and sworn as a witness, I could and would competently testify to the above.

Executed this 19th day of December, 2017, at Los Angeles, California. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

MOISES L. SIMBULAN

DECLARATION OF RAYMOND H. AVER

I, RAYMOND H. AVER, declare:

1. I am an attorney licensed to practice in the state of California. I am an employee of the Law Offices Of Raymond H. Aver ("Aver Firm"). The Aver Firm is the proposed general insolvency counsel to Advance Specialty Care, LLC, the chapter 11 debtor and debtor in possession in the above captioned case.

2. Attached as **Exhibit C** hereto is a true and correct copy of Local Bankruptcy Rule ("LBR") form F 4001-2.STMT.FINANCE. None of the boxes are checked on the form because the proposed form of order, discussed below, does not contain any of the provisions listed in the form required by the LBR.

3. Attached as **Exhibit D** hereto is a true and correct copy of the proposed "Order Granting "Motion For Order Authorizing Debtor And Debtor In Possession To Use Cash Collateral.'"

4. I have personal knowledge of the facts stated herein, except where stated on information and belief, and where so stated, I am informed and believe that such facts are true and correct. If called and sworn as a witness, I could and would competently testify to the above.

Executed this 19th day of December, 2017, at Los Angeles, California. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

RAYMOND H. AVER

EXHIBIT A

Fill in this information to identify the case:

Debtor 1 ADVANCED SPECIALTY CARE, LLC

Debtor 2 (Spouse, if filing) _____

United States Bankruptcy Court for the: CENTRAL District of CALIFORNIA (State)

Case number 2:17-BK-24737-RK

Official Form 410

Proof of Claim

04/16

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. **Do not send original documents;** they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to $500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) **that you received.**

Part 1: Identify the Claim

1. Who is the current creditor?

Department of the Treasury - Internal Revenue Service
Name of the current creditor (the person or entity to be paid for this claim)

Other names the creditor used with the debtor _____

2. Has this claim been acquired from someone else?

■ No
☐ Yes. From whom? _____

3. Where should notices and payments to the creditor be sent?

Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)

Where should notices to the creditor be sent?	**Where should payments to the creditor be sent?** (if different)
Internal Revenue Service (Name)	Internal Revenue Service (Name)
P.O. Box 7346 (Number Street)	Insolvency Group 1 300 North Los Angeles St, M/S 5022 (Number Street)
Philadelphia PA 19101-7346 (City State ZIP Code)	Los Angeles CA 90012 (City State ZIP Code)
Contact phone 1-800-973-0424	Contact phone (213) 372-4330
Contact email _____	Contact email _____

Creditor Number: 38215764

Uniform claim identifier for electronic payments in chapter 13 (if you use one)

_____

4. Does this claim amend one already filed?

■ No
☐ Yes. Claim number on court claims registry (if known) _____ Filed on: _____ MM / DD / YYYY

5. Do you know if anyone else has filed a proof of claim for this claim?

■ No
☐ Yes. Who made the earlier filing? _____

Part 2: Give Information About the Claim as of the Date the Case Was Filed

6. Do you have any number you use to identify the debtor?
☐ No
■ Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: See Attachment

7. How much is the claim? $ 2,422,646.20
Does this amount include interest or other charges?
☐ No
■ Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).

8. What is the basis of the claim?
Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card.
Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c).
Limit disclosing information that is entitled to privacy, such as health care information.

Taxes

9. Is all or part of the claim secured?
☐ No
■ Yes. The claim is secured by a lien on property.

Nature of property:
■ Real Estate. If the claim is secured by the debtor's principal residence, file a Mortgage Proof of Claim Attachment (Official Form 410-A) with this Proof of Claim.
■ Motor Vehicle
■ Other. Describe: *All of debtor(s) right, title and interest to property - 26 U.S.C. §6321.

Basis for perfection: See Attachment
Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)

Value of Property: $

Amount of the claim that is secured: $ 1,777,333.87

Amount of the claim that is unsecured: $ 645,312.33 (The sum of the secured and unsecured amounts should match the amount in line 7.)

Amount necessary to cure any default as of the date of the petition: $

Annual Interest Rate (when case was filed) 4 %
☐ Fixed
■ Variable

10. Is this claim based on a lease?
■ No
☐ Yes. **Amount necessary to cure any default as of the date of the petition.** $

11. Is this claim subject to a right of setoff?
☐ No
■ Yes. Identify the property See Attachment

12. Is all or part of the claim entitled to priority under 11 U.S.C. §507(a)?

A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.

☐ No
■ Yes. Check all that apply:

	Amount entitled to priority
☐ Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).	$
☐ Up to $2,850* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).	$
☐ Wages, salaries, or commissions (up to $12,850*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).	$
■ Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).	$ 578,497.39
☐ Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).	$
☐ Other. Specify subsection of 11 U.S.C. § 507(a)(__) that applies.	$

*Amounts are subject to adjustment on 4/01/19 and every 3 years after that for cases begun on or after the date of adjustment.

Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to $500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

■ I am the creditor.
☐ I am the creditor's attorney or authorized agent.
☐ I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.
☐ I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this Proof of Claim serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this Proof of Claim and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date 12/05/2017
MM / DD / YYYY

/s/ NEAL KAKUSKE
(Signature)

Print the name of the person who is completing and signing this claim:

Name: NEAL (First name) | (Middle name) | KAKUSKE (Last name)

Title: Insolvency Advisor

Company: Internal Revenue Service
Identify the corporate servicer as the company if the authorized agent is a servicer.

Address: Insolvency Group 1 300 North Los Angeles St, M/S 5022
Number Street

Los Angeles (City) | CA (State) | 90012 (ZIP Code)

Contact Phone (213) 372-4330 Email:

Proof of Claim for Internal Revenue Taxes

Department of the Treasury/Internal Revenue Service

In the Matter of: ADVANCED SPECIALTY CARE, LLC
3470 WILSHIRE BLVD, STE 600
LOS ANGELES, CA 90010

Form 410
Attachment

Case Number
2:17-BK-24737-RK

Type of Bankruptcy Case
CHAPTER 11

Date of Petition
11/30/2017

The United States has not identified a right of setoff or counterclaim. However, this determination is based on available data and is not intended to waive any right to setoff against this claim debts owed to this debtor by this or any other federal agency. All rights of setoff are preserved and will be asserted to the extent lawful.

Secured Claims (Notices of Federal tax lien filed under internal revenue laws before petition date)

Taxpayer ID Number	*Kind of Tax*	*Tax Period*	*Date Tax Assessed*	*Tax Due*	*Penalty to Petition Date*	*Interest to Petition Date*	*Notice of Tax Lien Filed: Date*	*Office Location*
XX-XXX5644	FUTA	12/31/2013	06/30/2014	$241.02	$4,094.10	$809.66	01/20/2015	CALIFORNIA
							01/16/2015	LOS ANGELES COU
XX-XXX5644	WT-FICA	03/31/2014	06/30/2014	$0.00	$20,600.60	$245.28	01/20/2015	CALIFORNIA
							01/16/2015	LOS ANGELES COU
XX-XXX5644	WT-FICA	06/30/2014	11/24/2014	$107,511.19	$78,995.80	$14,824.54	01/20/2015	CALIFORNIA
							01/16/2015	LOS ANGELES COU
XX-XXX5644	WT-FICA	09/30/2014	02/16/2015	$181,621.71	$98,937.58	$20,994.15	05/01/2015	CALIFORNIA
							05/01/2015	LOS ANGELES COU
XX-XXX5644	WT-FICA	12/31/2014	04/06/2015	$0.00	$12,441.70	$0.00	06/08/2015	CALIFORNIA
							06/10/2015	LOS ANGELES COU
XX-XXX5644	FUTA	12/31/2014	04/27/2015	$18,228.78	$7,890.98	$1,948.67	08/05/2015	CALIFORNIA
							08/06/2015	LOS ANGELES COU
XX-XXX5644	WT-FICA	03/31/2015	07/06/2015	$0.00	$14,594.84	$0.00	08/05/2015	CALIFORNIA
							08/06/2015	LOS ANGELES COU
XX-XXX5644	WT-FICA	06/30/2015	12/28/2015	$31,373.14	$38,164.94	$3,077.19	11/10/2016	CALIFORNIA
							11/04/2016	LOS ANGELES COU
XX-XXX5644	WT-FICA	09/30/2015	02/29/2016	$86,692.58	$50,082.50	$7,276.32	11/10/2016	CALIFORNIA
							11/04/2016	LOS ANGELES COU
XX-XXX5644	WT-FICA	12/31/2015	05/02/2016	$228,735.32	$102,567.50	$17,374.33	11/10/2016	CALIFORNIA
							11/04/2016	LOS ANGELES COU
XX-XXX5644	FUTA	12/31/2015	05/23/2016	$20,471.61	$6,912.44	$1,518.89	11/10/2016	CALIFORNIA
							11/04/2016	LOS ANGELES COU
XX-XXX5644	WT-FICA	03/31/2016	07/11/2016	$142,272.32	$57,512.28	$9,308.37	11/10/2016	CALIFORNIA
							11/04/2016	LOS ANGELES COU
XX-XXX5644	WT-FICA	06/30/2016	12/19/2016	$132,716.54	$53,637.48	$7,598.37	03/22/2017	CALIFORNIA
							03/17/2017	LOS ANGELES COU
XX-XXX5644	WT-FICA	09/30/2016	02/13/2017	$116,499.38	$45,595.59	$5,157.64	03/22/2017	CALIFORNIA
							03/17/2017	LOS ANGELES COU
XX-XXX5644	FUTA	12/31/2016	05/08/2017	$22,557.01	$5,489.99	$761.54	07/05/2017	CALIFORNIA
							06/28/2017	LOS ANGELES COU
				$1,088,920.60	$597,518.32	$90,894.95		

Total Amount of Secured Claims: **$1,777,333.87**

Proof of Claim for Internal Revenue Taxes

Department of the Treasury/Internal Revenue Service

Form 410
Attachment

In the Matter of: ADVANCED SPECIALTY CARE, LLC
3470 WILSHIRE BLVD, STE 600
LOS ANGELES, CA 90010

Case Number
2:17-BK-24737-RK

Type of Bankruptcy Case
CHAPTER 11

Date of Petition
11/30/2017

Unsecured Priority Claims under section 507(a)(8) of the Bankruptcy Code

Taxpayer ID Number	*Kind of Tax*	*Tax Period*		*Date Tax Assessed*	*Tax Due*	*Interest to Petition Date*
XX-XXX5644	WT-FICA	03/31/2015	1	Pending Examination	$16,743.25	$1,654.77
XX-XXX5644	WT-FICA	06/30/2015	1	Pending Examination	$16,501.45	$1,494.29
XX-XXX5644	WT-FICA	09/30/2015	1	Pending Examination	$16,371.25	$1,348.02
XX-XXX5644	WT-FICA	12/31/2015	1	Pending Examination	$16,371.25	$1,214.67
XX-XXX5644	FUTA	12/31/2015	1	Pending Examination	$2,838.75	$210.61
XX-XXX5644	WT-FICA	03/31/2016	1	Pending Examination	$3,940.34	$257.80
XX-XXX5644	WT-FICA	06/30/2016	1	Pending Examination	$3,940.34	$215.80
XX-XXX5644	WT-FICA	09/30/2016	1	Pending Examination	$3,940.34	$174.24
XX-XXX5644	WT-FICA	12/31/2016		07/17/2017	$53,405.26	$1,825.26
XX-XXX5644	WT-FICA	12/31/2016	1	Pending Examination	$3,940.34	$133.04
XX-XXX5644	FUTA	12/31/2016	1	Pending Examination	$6,123.48	$206.74
XX-XXX5644	CORP-INC	05/31/2017	2	NOT FILED	$100.00	$0.00
XX-XXX5644	WT-FICA	06/30/2017		11/13/2017	$37,160.15	$558.69
XX-XXX5644	WT-FICA	09/30/2017	3	Unassessed-No Return	$218,488.41	$719.46
XX-XXX5644	WT-FICA	12/31/2017	4	Unassessed Liability	$144,058.30	$0.00
XX-XXX5644	FUTA	12/31/2017	4	Unassessed Liability	$24,561.09	$0.00
					$568,484.00	$10,013.39

Total Amount of Unsecured Priority Claims: **$578,497.39**

Unsecured General Claims

Penalty to date of petition on unsecured priority claims (including interest thereon) $66,814.94

Total Amount of Unsecured General Claims: **$66,814.94**

1 PROPOSED TAX DEFICIENCY DETERMINED BY EXAMINATION OF DEBTOR(S) TAX RETURN.

2 THE ABOVE LIABILITY HAS BEEN LISTED AS A POTENTIAL LIABILITY FOR THE DEBTOR BECAUSE THE RETURN HAS NOT BEEN FILED. AS SOON AS THE DEBTOR FILES THE RETURN WITH THE IRS AS REQUIRED BY LAW THIS CLAIM WILL BE ADJUSTED TO REFLECT THE ASSESSED LIABILITY.

3 UNASSESSED TAX LIABILITY(IES) HAVE BEEN LISTED ON THIS CLAIM BECAUSE OUR RECORDS SHOW NO RETURN(S) FILED. WHEN THE DEBTOR(S) FILES THE RETURN OR PROVIDES OTHER INFORMATION AS REQUIRED BY LAW THE CLAIM WILL BE AMENDED

4 THE ABOVE LIABILITY HAS BEEN LISTED AS A POTENTIAL LIABILITY FOR THE DEBTOR DUE TO DEBTOR'S FAILURE TO MAKE REQUIRED TAX DEPOSITS. AS SOON THE DEBTOR FILES THE RETURN WITH THE IRS AS REQUIRED BY LAW THIS CLAIM WILL BE ADJUSTED AS NECESSARY.

1872

COURT RECORDING DATA

INTERNAL REVENUE SERVICE
FACSIMILE FEDERAL TAX LIEN DOCUMENT

BANKRUPTCY DOCKET: 2:17-BK-24737-RK

Lien Recorded : 07/05/2017 - 17:00PM
Recording Number:
UCC Number : 177594489084
Liber :
Page :

Area: SMALL BUSINESS/SELF EMPLOYED #7
Lien Unit Phone: (800) 913-6050

IRS Serial Number: 266966017

This Lien Has Been Filed in Accordance with
Internal Revenue Regulation 301.6323(f)-1.

Name of Taxpayer:
ADVANCE SPECIALTY CARE LLC
MOISES L SIMBULAN MBR

Residence:
3470 WILSHIRE BLVD STE 600
LOS ANGELES, CA 90010-3917

With respect to each assessment below, unless notice of lien is refiled by the date in column(e), this notice shall constitute the certificate of release of lien as defined in IRC 6325(a).

Form (a)	Period (b)	ID Number (c)	Assessed (d)	Refile Deadline (e)	Unpaid Balance (f)
940	12/31/2016	XX-XXX5644	05/08/2017	06/07/2027	$27,131.01

Filed at: SECRETARY OF STATE
CALIFORNIA
SACRAMENTO, CA 94235

Total $27,131.01

This notice was prepared and executed at OAKLAND, CA on this, the 19th day of June, 2017.

Authorizing Official:
M. DURAN

Title:
REVENUE OFFICER 27-01-1935

1872

COURT RECORDING DATA

INTERNAL REVENUE SERVICE FACSIMILE FEDERAL TAX LIEN DOCUMENT BANKRUPTCY DOCKET: 2:17-BK-24737-RK	Lien Recorded : 06/28/2017 - 09:02AM Recording Number: 20170715945 UCC Number : Liber : Page :
Area: SMALL BUSINESS/SELF EMPLOYED #7 Lien Unit Phone: (800) 913-6050	IRS Serial Number: 266966117

This Lien Has Been Filed in Accordance with
Internal Revenue Regulation 301.6323(f)-1.

Name of Taxpayer:
ADVANCE SPECIALTY CARE LLC
MOISES L SIMBULAN MBR

Residence:
3470 WILSHIRE BLVD STE 600
LOS ANGELES, CA 90010-3917

With respect to each assessment below, unless notice of lien is refiled by the date in column(e), this notice shall constitute the certificate of release of lien as defined in IRC 6325(a).

Form (a)	Period (b)	ID Number (c)	Assessed (d)	Refile Deadline (e)	Unpaid Balance (f)
940	12/31/2016	XX-XXX5644	05/08/2017	06/07/2027	$27,131.01

Filed at: COUNTY RECORDER LOS ANGELES COUNTY NORWALK, CA 90650	Total	$27,131.01

This notice was prepared and executed at OAKLAND, CA
on this, the 19th day of June, 2017.

Authorizing Official: M. DURAN	Title: REVENUE OFFICER 27-01-1935

1872

COURT RECORDING DATA

INTERNAL REVENUE SERVICE
FACSIMILE FEDERAL TAX LIEN DOCUMENT

BANKRUPTCY DOCKET: 2:17-BK-24737-RK

Lien Recorded : 11/10/2016 - 17:00PM
Recording Number:
UCC Number : 167558255589
Liber :
Page :

Area: SMALL BUSINESS/SELF EMPLOYED #7
Lien Unit Phone: (800) 913-6050

IRS Serial Number: 236099016

This Lien Has Been Filed in Accordance with
Internal Revenue Regulation 301.6323(f)-1.

Name of Taxpayer:
ADVANCE SPECIALTY CARE LLC
MOISES L SIMBULAN MBR

Residence:
3470 WILSHIRE BLVD STE 600
LOS ANGELES, CA 90010-3917

With respect to each assessment below, unless notice of lien is refiled by the date in column(e), this notice shall constitute the certificate of release of lien as defined in IRC 6325(a).

Form (a)	Period (b)	ID Number (c)	Assessed (d)	Refile Deadline (e)	Unpaid Balance (f)
941	06/30/2015	XX-XXX5644	12/28/2015	01/27/2026	$64,532.07
941	09/30/2015	XX-XXX5644	02/29/2016	03/30/2026	$121,551.02
941	12/31/2015	XX-XXX5644	05/02/2016	06/01/2026	$304,534.46
940	12/31/2015	XX-XXX5644	05/23/2016	06/22/2026	$24,568.61
941	03/31/2016	XX-XXX5644	07/11/2016	08/10/2026	$174,405.59

Filed at: SECRETARY OF STATE
CALIFORNIA
SACRAMENTO, CA 94235

Total $689,591.75

This notice was prepared and executed at OAKLAND, CA
on this, the 28th day of October, 2016.

Authorizing Official:
M. DURAN

Title:
REVENUE OFFICER 27-01-1935

1872

COURT RECORDING DATA

INTERNAL REVENUE SERVICE FACSIMILE FEDERAL TAX LIEN DOCUMENT BANKRUPTCY DOCKET: 2:17-BK-24737-RK	Lien Recorded : 11/04/2016 - 08:26AM Recording Number: 20161374713 UCC Number : Liber : Page :
Area: SMALL BUSINESS/SELF EMPLOYED #7 Lien Unit Phone: (800) 913-6050	IRS Serial Number: 236099116

This Lien Has Been Filed in Accordance with Internal Revenue Regulation 301.6323(f)-1.

Name of Taxpayer:
ADVANCE SPECIALTY CARE LLC
MOISES L SIMBULAN MBR

Residence:
3470 WILSHIRE BLVD STE 600
LOS ANGELES, CA 90010-3917

With respect to each assessment below, unless notice of lien is refiled by the date in column(e), this notice shall constitute the certificate of release of lien as defined in IRC 6325(a).

Form (a)	Period (b)	ID Number (c)	Assessed (d)	Refile Deadline (e)	Unpaid Balance (f)
941	06/30/2015	XX-XXX5644	12/28/2015	01/27/2026	$64,532.07
941	09/30/2015	XX-XXX5644	02/29/2016	03/30/2026	$121,551.02
941	12/31/2015	XX-XXX5644	05/02/2016	06/01/2026	$304,534.46
940	12/31/2015	XX-XXX5644	05/23/2016	06/22/2026	$24,568.61
941	03/31/2016	XX-XXX5644	07/11/2016	08/10/2026	$174,405.59

Filed at: COUNTY RECORDER LOS ANGELES COUNTY NORWALK, CA 90650	Total	$689,591.75

This notice was prepared and executed at OAKLAND, CA on this, the 28th day of October, 2016.

Authorizing Official: M. DURAN	Title: REVENUE OFFICER 27-01-1935

1872

COURT RECORDING DATA

INTERNAL REVENUE SERVICE FACSIMILE FEDERAL TAX LIEN DOCUMENT BANKRUPTCY DOCKET: 2:17-BK-24737-RK	Lien Recorded : 05/01/2015 - 17:00PM Recording Number: UCC Number : 157463239434 Liber : Page :
Area: SMALL BUSINESS/SELF EMPLOYED #7 Lien Unit Phone: (800) 913-6050	IRS Serial Number: 153700815

This Lien Has Been Filed in Accordance with Internal Revenue Regulation 301.6323(f)-1.

Name of Taxpayer:
ADVANCE SPECIALTY CARE LLC
MOISES L SIMBULAN MBR

Residence:
3470 WILSHIRE BLVD STE 600
LOS ANGELES, CA 90010-3917

With respect to each assessment below, unless notice of lien is refiled by the date in column(e), this notice shall constitute the certificate of release of lien as defined in IRC 6325(a).

Form (a)	Period (b)	ID Number (c)	Assessed (d)	Refile Deadline (e)	Unpaid Balance (f)
941	09/30/2014	XX-XXX5644	02/16/2015	03/18/2025	$222,352.37

Filed at: SECRETARY OF STATE CALIFORNIA SACRAMENTO, CA 94235	Total	$222,352.37

This notice was prepared and executed at OAKLAND, CA on this, the 20th day of April, 2015.

Authorizing Official: W. PAYNE	Title: REVENUE OFFICER 27-01-1910

1872

COURT RECORDING DATA

INTERNAL REVENUE SERVICE FACSIMILE FEDERAL TAX LIEN DOCUMENT BANKRUPTCY DOCKET: 2:17-BK-24737-RK	Lien Recorded : 05/01/2015 - 08:49AM Recording Number: 20150498669 UCC Number : Liber : Page :
Area: SMALL BUSINESS/SELF EMPLOYED #7 Lien Unit Phone: (800) 913-6050	IRS Serial Number: 153700915

This Lien Has Been Filed in Accordance with Internal Revenue Regulation 301.6323(f)-1.

Name of Taxpayer:
ADVANCE SPECIALTY CARE LLC
MOISES L SIMBULAN MBR

Residence:
3470 WILSHIRE BLVD STE 600
LOS ANGELES, CA 90010-3917

With respect to each assessment below, unless notice of lien is refiled by the date in column(e), this notice shall constitute the certificate of release of lien as defined in IRC 6325(a).

Form (a)	Period (b)	ID Number (c)	Assessed (d)	Refile Deadline (e)	Unpaid Balance (f)
941	09/30/2014	XX-XXX5644	02/16/2015	03/18/2025	$222,352.37

Filed at: COUNTY RECORDER LOS ANGELES COUNTY NORWALK, CA 90650	Total	$222,352.37

This notice was prepared and executed at OAKLAND, CA on this, the 20th day of April, 2015.

Authorizing Official: W. PAYNE	Title: REVENUE OFFICER 27-01-1910

1872

COURT RECORDING DATA

INTERNAL REVENUE SERVICE FACSIMILE FEDERAL TAX LIEN DOCUMENT BANKRUPTCY DOCKET: 2:17-BK-24737-RK	Lien Recorded : 06/08/2015 - 17:00PM Recording Number: UCC Number : 157469100992 Liber : Page :
Area: SMALL BUSINESS/SELF EMPLOYED #7 Lien Unit Phone: (800) 913-6050	IRS Serial Number: 159726915

This Lien Has Been Filed in Accordance with
Internal Revenue Regulation 301.6323(f)-1.

Name of Taxpayer:
ADVANCE SPECIALTY CARE LLC
MOISES L SIMBULAN MBR

Residence:
3470 WILSHIRE BLVD STE 600
LOS ANGELES, CA 90010-3917

With respect to each assessment below, unless notice of lien is refiled by the date in column(e), this notice shall constitute the certificate of release of lien as defined in IRC 6325(a).

Form (a)	Period (b)	ID Number (c)	Assessed (d)	Refile Deadline (e)	Unpaid Balance (f)
941	12/31/2014	XX-XXX5644	04/06/2015	05/06/2025	$11,244.72

Filed at: SECRETARY OF STATE CALIFORNIA SACRAMENTO, CA 94235	Total	$11,244.72

This notice was prepared and executed at OAKLAND, CA
on this, the 29th day of May, 2015.

Authorizing Official: W. PAYNE	Title: REVENUE OFFICER 27-01-1910

1872

COURT RECORDING DATA

INTERNAL REVENUE SERVICE FACSIMILE FEDERAL TAX LIEN DOCUMENT BANKRUPTCY DOCKET: 2:17-BK-24737-RK	Lien Recorded : 06/10/2015 - 08:04AM Recording Number: 20150682132 UCC Number : Liber : Page :
Area: SMALL BUSINESS/SELF EMPLOYED #7 Lien Unit Phone: (800) 913-6050	IRS Serial Number: 159727015

This Lien Has Been Filed in Accordance with Internal Revenue Regulation 301.6323(f)-1.

Name of Taxpayer:
ADVANCE SPECIALTY CARE LLC
MOISES L SIMBULAN MBR

Residence:
3470 WILSHIRE BLVD STE 600
LOS ANGELES, CA 90010-3917

With respect to each assessment below, unless notice of lien is refiled by the date in column(e), this notice shall constitute the certificate of release of lien as defined in IRC 6325(a).

Form (a)	Period (b)	ID Number (c)	Assessed (d)	Refile Deadline (e)	Unpaid Balance (f)
941	12/31/2014	XX-XXX5644	04/06/2015	05/06/2025	$11,244.72

Filed at: COUNTY RECORDER LOS ANGELES COUNTY NORWALK, CA 90650	Total	$11,244.72

This notice was prepared and executed at OAKLAND, CA on this, the 29th day of May, 2015.

Authorizing Official: W. PAYNE	Title: REVENUE OFFICER 27-01-1910

1872

COURT RECORDING DATA

INTERNAL REVENUE SERVICE FACSIMILE FEDERAL TAX LIEN DOCUMENT BANKRUPTCY DOCKET: 2:17-BK-24737-RK	Lien Recorded : 08/05/2015 - 17:00PM Recording Number: UCC Number : 157478875204 Liber : Page :
Area: SMALL BUSINESS/SELF EMPLOYED #7 Lien Unit Phone: (800) 913-6050	IRS Serial Number: 168857315

This Lien Has Been Filed in Accordance with
Internal Revenue Regulation 301.6323(f)-1.

Name of Taxpayer:
ADVANCE SPECIALTY CARE LLC
MOISES L SIMBULAN MBR

Residence:
3470 WILSHIRE BLVD STE 600
LOS ANGELES, CA 90010-3917

With respect to each assessment below, unless notice of lien is refiled by the date in column(e), this notice shall constitute the certificate of release of lien as defined in IRC 6325(a).

Form (a)	Period (b)	ID Number (c)	Assessed (d)	Refile Deadline (e)	Unpaid Balance (f)
941	03/31/2015	XX-XXX5644	07/06/2015	08/05/2025	$13,355.48

Filed at: SECRETARY OF STATE CALIFORNIA SACRAMENTO, CA 94235	Total	$13,355.48

This notice was prepared and executed at OAKLAND, CA
on this, the 28th day of July, 2015.

Authorizing Official: W. PAYNE	Title: REVENUE OFFICER 27-01-1910

1872

COURT RECORDING DATA

INTERNAL REVENUE SERVICE FACSIMILE FEDERAL TAX LIEN DOCUMENT BANKRUPTCY DOCKET: 2:17-BK-24737-RK	Lien Recorded : 08/06/2015 - 09:13AM Recording Number: 20150960096 UCC Number : Liber : Page :
Area: SMALL BUSINESS/SELF EMPLOYED #7 Lien Unit Phone: (800) 913-6050	IRS Serial Number: 168857415

This Lien Has Been Filed in Accordance with
Internal Revenue Regulation 301.6323(f)-1.

Name of Taxpayer:
ADVANCE SPECIALTY CARE LLC
MOISES L SIMBULAN MBR

Residence:
3470 WILSHIRE BLVD STE 600
LOS ANGELES, CA 90010-3917

With respect to each assessment below, unless notice of lien is refiled by the date in column(e), this notice shall constitute the certificate of release of lien as defined in IRC 6325(a).

Form (a)	Period (b)	ID Number (c)	Assessed (d)	Refile Deadline (e)	Unpaid Balance (f)
941	03/31/2015	XX-XXX5644	07/06/2015	08/05/2025	$13,355.48

Filed at: COUNTY RECORDER LOS ANGELES COUNTY NORWALK, CA 90650	Total	$13,355.48

This notice was prepared and executed at OAKLAND, CA
on this, the 28th day of July, 2015.

Authorizing Official: W. PAYNE	Title: REVENUE OFFICER 27-01-1910

1872

COURT RECORDING DATA

INTERNAL REVENUE SERVICE FACSIMILE FEDERAL TAX LIEN DOCUMENT BANKRUPTCY DOCKET: 2:17-BK-24737-RK	Lien Recorded : 03/22/2017 - 17:00PM Recording Number: UCC Number : 177576592948 Liber : Page :
Area: SMALL BUSINESS/SELF EMPLOYED #7 Lien Unit Phone: (800) 913-6050	IRS Serial Number: 252032017

This Lien Has Been Filed in Accordance with
Internal Revenue Regulation 301.6323(f)-1.

Name of Taxpayer:
ADVANCE SPECIALTY CARE LLC
MOISES L SIMBULAN MBR

Residence:
3470 WILSHIRE BLVD STE 600
LOS ANGELES, CA 90010-3917

With respect to each assessment below, unless notice of lien is refiled by the date in column(e), this notice shall constitute the certificate of release of lien as defined in IRC 6325(a).

Form (a)	Period (b)	ID Number (c)	Assessed (d)	Refile Deadline (e)	Unpaid Balance (f)
941	06/30/2016	XX-XXX5644	12/19/2016	01/18/2027	$182,332.35
941	09/30/2016	XX-XXX5644	02/13/2017	03/15/2027	$151,449.83

Filed at: SECRETARY OF STATE CALIFORNIA SACRAMENTO, CA 94235	Total	$333,782.18

This notice was prepared and executed at OAKLAND, CA on this, the 08th day of March, 2017.

Authorizing Official: M. DURAN	Title: REVENUE OFFICER 27-01-1935

1872 COURT RECORDING DATA

INTERNAL REVENUE SERVICE FACSIMILE FEDERAL TAX LIEN DOCUMENT BANKRUPTCY DOCKET: 2:17-BK-24737-RK	Lien Recorded : 03/17/2017 - 08:40AM Recording Number: 20170304387 UCC Number : Liber : Page :
Area: SMALL BUSINESS/SELF EMPLOYED #7 Lien Unit Phone: (800) 913-6050	IRS Serial Number: 252032117

This Lien Has Been Filed in Accordance with Internal Revenue Regulation 301.6323(f)-1.

Name of Taxpayer:
ADVANCE SPECIALTY CARE LLC
MOISES L SIMBULAN MBR

Residence:
3470 WILSHIRE BLVD STE 600
LOS ANGELES, CA 90010-3917

With respect to each assessment below, unless notice of lien is refiled by the date in column(e), this notice shall constitute the certificate of release of lien as defined in IRC 6325(a).

Form (a)	Period (b)	ID Number (c)	Assessed (d)	Refile Deadline (e)	Unpaid Balance (f)
941	06/30/2016	XX-XXX5644	12/19/2016	01/18/2027	$182,332.35
941	09/30/2016	XX-XXX5644	02/13/2017	03/15/2027	$151,449.83

Filed at: COUNTY RECORDER LOS ANGELES COUNTY NORWALK, CA 90650	Total	$333,782.18

This notice was prepared and executed at OAKLAND, CA on this, the 08th day of March, 2017.

Authorizing Official: M. DURAN	Title: REVENUE OFFICER 27-01-1935

1872

COURT RECORDING DATA

INTERNAL REVENUE SERVICE FACSIMILE FEDERAL TAX LIEN DOCUMENT BANKRUPTCY DOCKET: 2:17-BK-24737-RK	Lien Recorded : 01/20/2015 - 17:00PM Recording Number: UCC Number : 157446221355 Liber : Page :
Area: SMALL BUSINESS/SELF EMPLOYED #7 Lien Unit Phone: (800) 913-6050	IRS Serial Number: 138304515

This Lien Has Been Filed in Accordance with
Internal Revenue Regulation 301.6323(f)-1.

Name of Taxpayer:
ADVANCE SPECIALTY CARE LLC
MOISES L SIMBULAN MBR

Residence:
3470 WILSHIRE BLVD STE 600
LOS ANGELES, CA 90010-3917

With respect to each assessment below, unless notice of lien is refiled by the date in column(e), this notice shall constitute the certificate of release of lien as defined in IRC 6325(a).

Form (a)	Period (b)	ID Number (c)	Assessed (d)	Refile Deadline (e)	Unpaid Balance (f)
940	12/31/2013	XX-XXX5644	06/30/2014	07/30/2024	$10,470.88
941	12/31/2013	XX-XXX5644	04/28/2014	05/28/2024	$18,131.80
941	03/31/2014	XX-XXX5644	06/30/2014	07/30/2024	$18,714.31
941	06/30/2014	XX-XXX5644	11/24/2014	12/24/2024	$190,226.57

Filed at: SECRETARY OF STATE CALIFORNIA SACRAMENTO, CA 94235	Total	$237,543.56

This notice was prepared and executed at OAKLAND, CA
on this, the 08th day of January, 2015.

Authorizing Official: W. PAYNE	Title: REVENUE OFFICER 27-01-1910

1872

COURT RECORDING DATA

INTERNAL REVENUE SERVICE FACSIMILE FEDERAL TAX LIEN DOCUMENT BANKRUPTCY DOCKET: 2:17-BK-24737-RK	Lien Recorded : 01/16/2015 - 08:22AM Recording Number: 20150056357 UCC Number : Liber : Page :
Area: SMALL BUSINESS/SELF EMPLOYED #7 Lien Unit Phone: (800) 913-6050	IRS Serial Number: 138304615

This Lien Has Been Filed in Accordance with Internal Revenue Regulation 301.6323(f)-1.

Name of Taxpayer:
ADVANCE SPECIALTY CARE LLC
MOISES L SIMBULAN MBR

Residence:
3470 WILSHIRE BLVD STE 600
LOS ANGELES, CA 90010-3917

With respect to each assessment below, unless notice of lien is refiled by the date in column(e), this notice shall constitute the certificate of release of lien as defined in IRC 6325(a).

Form (a)	Period (b)	ID Number (c)	Assessed (d)	Refile Deadline (e)	Unpaid Balance (f)
940	12/31/2013	XX-XXX5644	06/30/2014	07/30/2024	$10,470.88
941	12/31/2013	XX-XXX5644	04/28/2014	05/28/2024	$18,131.80
941	03/31/2014	XX-XXX5644	06/30/2014	07/30/2024	$18,714.31
941	06/30/2014	XX-XXX5644	11/24/2014	12/24/2024	$190,226.57

Filed at: COUNTY RECORDER LOS ANGELES COUNTY NORWALK, CA 90650	Total	$237,543.56

This notice was prepared and executed at OAKLAND, CA on this, the 08th day of January, 2015.

Authorizing Official: W. PAYNE	Title: REVENUE OFFICER 27-01-1910

1872

COURT RECORDING DATA

INTERNAL REVENUE SERVICE FACSIMILE FEDERAL TAX LIEN DOCUMENT BANKRUPTCY DOCKET: 2:17-BK-24737-RK	Lien Recorded : 08/05/2015 - 17:00PM Recording Number: UCC Number : 157478865667 Liber : Page :
Area: SMALL BUSINESS/SELF EMPLOYED #7 Lien Unit Phone: (800) 913-6050	IRS Serial Number: 168578515

This Lien Has Been Filed in Accordance with
Internal Revenue Regulation 301.6323(f)-1.

Name of Taxpayer:
ADVANCE SPECIALTY CARE LLC
MOISES L SIMBULAN MBR

Residence:
3470 WILSHIRE BLVD STE 600
LOS ANGELES, CA 90010-3917

With respect to each assessment below, unless notice of lien is refiled by the date in column(e), this notice shall constitute the certificate of release of lien as defined in IRC 6325(a).

Form (a)	Period (b)	ID Number (c)	Assessed (d)	Refile Deadline (e)	Unpaid Balance (f)
940	12/31/2014	XX-XXX5644	04/27/2015	05/27/2025	$21,663.42

Filed at: SECRETARY OF STATE CALIFORNIA SACRAMENTO, CA 94235	Total	$21,663.42

This notice was prepared and executed at OAKLAND, CA
on this, the 27th day of July, 2015.

Authorizing Official: W. PAYNE	Title: REVENUE OFFICER 27-01-1910

1872

COURT RECORDING DATA

INTERNAL REVENUE SERVICE FACSIMILE FEDERAL TAX LIEN DOCUMENT BANKRUPTCY DOCKET: 2:17-BK-24737-RK	Lien Recorded : 08/06/2015 - 09:13AM Recording Number: 20150960012 UCC Number : Liber : Page :
Area: SMALL BUSINESS/SELF EMPLOYED #7 Lien Unit Phone: (800) 913-6050	IRS Serial Number: 168578615

This Lien Has Been Filed in Accordance with Internal Revenue Regulation 301.6323(f)-1.

Name of Taxpayer:
ADVANCE SPECIALTY CARE LLC
MOISES L SIMBULAN MBR

Residence:
3470 WILSHIRE BLVD STE 600
LOS ANGELES, CA 90010-3917

With respect to each assessment below, unless notice of lien is refiled by the date in column(e), this notice shall constitute the certificate of release of lien as defined in IRC 6325(a).

Form (a)	Period (b)	ID Number (c)	Assessed (d)	Refile Deadline (e)	Unpaid Balance (f)
940	12/31/2014	XX-XXX5644	04/27/2015	05/27/2025	$21,663.42

Filed at: COUNTY RECORDER LOS ANGELES COUNTY NORWALK, CA 90650	Total	$21,663.42

This notice was prepared and executed at OAKLAND, CA on this, the 27th day of July, 2015.

Authorizing Official: W. PAYNE	Title: REVENUE OFFICER 27-01-1910

EXHIBIT B

PROJECTED CASH FLOW STATEMENT FOR THE FIRST 90 DAY PERIOD

	Dec-17	Jan-18	Feb-18
Gross Income	$ 522,202.00	$ 522,202.00	$ 522,202.00
Expenses			
Rent (Wilshire Boulevard Office)	$ 4,888.50	$ 4,888.50	$ 4,888.50
Accounting fees	$ 1,000.00	$ 1,000.00	$ 1,000.00
Consulting fees	$ 750.00	$ 750.00	$ 750.00
Legal fees	$ 3,500.00	$ 3,500.00	$ 3,500.00
UST fees	$ 1,625.00	$ 1,625.00	$ 1,625.00
Transportation/mileage reimbursement	$ 713.00	$ 713.00	$ 713.00
Cable/Internet/Telephone	$ 2,800.00	$ 2,800.00	$ 2,800.00
Employee Benefits (Insurance/401K)	$ 9,500.00	$ 9,500.00	$ 9,500.00
Salaries & Wages (Administrators)	$ 9,234.00	$ 9,234.00	$ 9,234.00
Salaries & Wages (Employees)	$ 358,408.80	$ 358,408.80	$ 358,408.80
Training & Seminars	$ 1,500.00	$ 1,500.00	$ 1,500.00
General Liability Insurance	$ 2,367.55	$ 2,367.55	$ 2,367.55
Worker's Compensation insurance	$ 15,029.55	$ 15,029.55	$ 15,029.55
Licenses & Permits	$ 474.00	$ 474.00	$ 474.00
Marketing	$ 15,500.00	$ 15,500.00	$ 15,500.00
Waste disposal	$ 55.00	$ 55.00	$ 55.00
Auto	$ 1,455.00	$ 1,455.00	$ 1,455.00
Office expenses	$ 2,500.00	$ 2,500.00	$ 2,500.00
Supplies	$ 7,250.00	$ 7,250.00	$ 7,250.00
Bank charges	$ 20.00	$ 20.00	$ 20.00
Outside services (Independent Contractors)	$ 28,215.00	$ 28,215.00	$ 28,215.00
Payroll processing	$ 800.00	$ 800.00	$ 800.00
Payroll taxes (IRS- $23,000 + EDD- $5,000)	$ 28,000.00	$ 28,000.00	$ 28,000.00
IRS	$ 1,500.00	$ 1,500.00	$ 1,500.00
Total Expenses	$ 497,085.40	$ 497,085.40	$ 497,085.40
Net Income	$ 25,116.60	$ 25,116.60	$ 25,116.60

EXHIBIT C

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address
Raymond H. Aver - SBN 109577
A Professional Corporation
10801 National Boulevard, Suite 100
Los Angeles, California 90064
Telephone: (310) 571-3511
email: ray@averlaw.com

FOR COURT USE ONLY

☐ *Individual appearing without attorney*
☒ *Attorney for:* ADVANCE SPECIALTY CARE, LLC

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION

In re:

ADVANCE SPECIALTY CARE, LLC,

Debtor(s).

CASE NO.: 2:17-bk-24737-RK
CHAPTER: 11

STATEMENT REGARDING CASH COLLATERAL OR DEBTOR IN POSSESSION FINANCING [FRBP 4001; LBR 4001-2]

DATE: [To Be Scheduled]
TIME:
COURTROOM: 1675
ADDRESS: United States Bankruptcy Court
255 East Temple Street
Los Angeles, CA 90012

Secured party(ies): Internal Revenue Service

The Debtor has requested the approval of either (1) a motion for use of cash collateral, or postpetition financing, or both, or (2) through a separately-filed motion, a stipulation providing for the use of cash collateral, or postpetition financing, or both. The proposed form of order on the motion or the stipulation contains the following provisions or findings of fact:

Disclosures Tracking FRBP 4001(c)(1)(B)(i) through (xi) and (d)(1)(B)	Page No.:	Line No. (if applicable)
☐ (i): "[A] grant of priority or a lien on property of the estate under § 364(c) or (d)"		
☐ (ii): "[T]he providing of adequate protection or priority for a claim that arose before the commencement of the case, including the granting of a lien on property of the estate to secure the claim, or the use of property of the estate or credit obtained under § 364 to make cash payments on account of the claim" ☐ Cross-collateralization, *i.e.*, clauses that secure prepetition debt by postpetition assets in which the secured party would not otherwise have a security interest by virtue of its prepetition security agreement or applicable law ☐ Roll-up, *i.e.*, provisions deeming prepetition debt to be postpetition debt or using postpetition loans from a prepetition secured party to pay part or all of that secured party's prepetition debt, other than as provided in § 552(b)		

Continued from page 1 ☐ Grant a replacement lien in an amount in excess of the dollar amount of the lien on cash collateral as of the petition date		
☐ (iii): "[A] determination of the validity, enforceability, priority, or amount of a claim that arose before the commencement of the case, or of any lien securing the claim"		
☐ (iv): "[A] waiver or modification of Code provisions or applicable rules relating to the automatic stay" ☐ Automatic relief from the automatic stay upon occurrence of certain events.		
☐ (v): "[A] waiver or modification of any entity's authority or right to file a plan, seek an extension of time in which the debtor has the exclusive right to file a plan, request the use of cash collateral under § 363(c), or request authority to obtain credit under § 364"		
☐ (vi): "[T]he establishment of deadlines for filing a plan of reorganization, for approval of a disclosure statement, for a hearing on confirmation, or for entry of a confirmation order"		
☐ (vii): "[A] waiver or modification of the applicability of nonbankruptcy law relating to the perfection of a lien on property of the estate, or on the foreclosure or other enforcement of the lien"		
☐ (viii): "[A] release, waiver, or limitation on any claim or other cause of action belonging to the estate or the trustee, including any modification of the statute of limitations or other deadline to commence an action"		
☐ (ix): "[T]he indemnification of any entity"		
☐ (x): "[A] release, waiver, or limitation of any right under § 506(c)" ☐ The granting of any lien on any claim or cause of action arising under § 506(c)		
☐ (xi): "The granting of any lien on any claim or cause of action arising under §§ 544, 545, 547, 548, 549, 553(b), 723(a), or 724(a)"		
Additional Disclosures Required by LBR 4001-2	**Page No.:**	**Line No. (if applicable)**
☐ With respect to a professional fee carve out, disparate treatment for professionals retained by a creditors' committee from that provided for the professionals retained by the debtor		
☐ Pay down prepetition principal owed to a creditor		
☐ Findings of fact on matters extraneous to the approval process		

12/19/2017 Raymond H. Aver

Date *Printed Name* *Signature*

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 10801 National Boulevard, Suite 100, Los Angeles, California 90064.

A true and correct copy of the foregoing document entitled: **STATEMENTREGARDING CASH COLLATERAL OR DEBTOR IN POSSESSION FINANCING [FRBP 4001; LBR 4001-2]** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) 12/19/2017, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:
On (*date*) 12/19/2017, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) 12/19/2017, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

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

12/19/2017	David Israel	
Date	*Printed Name*	*Signature*

SERVICE LIST

VIA NEF

Raymond H. Aver	ray@averlaw.com
Thomas J Polis	tom@polis-law.com, paralegal@polis-law.com; r59042@notifybestcase.com
United States Trustee (LA)	ustpregion16.la.ecf@usdoj.gov
Hatty K Yip	hatty.yip@usdoj.gov, dare.law@usdoj.gov, alvin.p.mar@usdoj.gov, kenneth.g.lau@usdoj.gov

VIA PERSONAL DELIVERY

Honorable Robert N. Kwan
Bin outside of Suite 1682

VIA FIRST CLASS MAIL

Entities With Interest In Cash Collateral
Internal Revenue Service
P.O. Box 7346
Philadelphia , PA 19101

Employment Development Department
Bankruptcy Group MIC 92E
P.O. Box 826880
Sacramento, California 94280-0001

Debtor
Advance Specialty Care, LLC
3470 Wilshire Boulevard, Suite 600
Los Angeles, CA 90010-3917

Twenty Largest Unsecured Creditors
Angela Varisco
5 R W Cole Drive
South El Monte, CA 91733

Anna Bella Vito
1850 Batson Avenue, #83
Rowland Heights, CA 91748

Asuncion L. Arbasto
7465 Ridgeway Drive
Buena Park, CA 90620

Atlas General Insurance Services
4365 Executive Drive, Suite 400
San Diego, CA 92121

Atlas General Insurance Services
c/o Hatkoff & Minassian
A Law Corproation
18757 Burbank Boulevard, Suite 100
Tarzana, CA 91356

Camille Sierra
417 N. Bonnie Brae Street, Apt. 15
Los Angeles, CA 90026

Cypress Insurance Company
c/o Marcelli Law Offices
940 Enchanted Way, Suite 101
Simi Valley, CA 93065

Emma Borges
c/o Woolls & Peer
One Wilshire Building
624 South Grand Avenue, 22nd Floor
Los Angeles, CA 90017-3876

Irma Fierro
230 College Drive, #F-1
Santa Maria, CA 93454

Jessie M. Orcino
6603 Turnergrove Drive
Lakewood, CA 90713

Joanna Rae Q. Pascual
14022 Sylvanwood Avenue
Norwalk, CA 90650

Kaiser Permanente
P.O. Box 23250
San Diego, CA 92193-3250

Kayla Afemata
15131 South Gibson Avenue
Compton, CA 90221

LV Medical Management
5811 East Beverly Boulevard
Los Angeles, CA 90022

M&K/Katherine C. Taroy
6680 Knott Avenue, #12
Buena Park, CA 90621

Mariano A. Alvarez, Esquire
Law Offices of Mariano A. Alvarez
Hanmi Bank Building
3660 Wilshire Boulevard, Suite 1140
Los Angeles, CA 90010

Milagros A. Victoria
10625 Petit Avenue, #122
Granada Hills, CA 91344

MP Diversified Business
133 West Scenic Drive
Monrovia, CA 91016

Relias Learning
c/o McCarthy, Burgess & Wolff
26000 Cannon Road
Cleveland, OH 44146

RMS Querubin
P.O. Box 394
Fontana, CA 92334

State Compensation Insurance Fund
P.O. Box 8192
Pleasanton, CA 94588

State Compensation Insurance Fund
5880 Owens Drive
2nd Floor, Building B
Pleasanton, CA 94588

State Compensation Insurance Fund
c/o Law Offices of Kenneth J. Freed
14226 Ventura Boulevard
P.O. Box 5914
Sherman Oaks, CA 91413

VIA email AND FIRST CLASS MAIL
United States of America
on behalf of its agency, the Internal Revenue Service
300 North Los Angeles Street
Los Angeles, California 90012
Attn: Jolene Tanner, Esquire
email: jolene.tanner@usdoj.gov

EXHIBIT D

RAYMOND H. AVER - SBN 109577
LAW OFFICES OF RAYMOND H. AVER
A Professional Corporation
10801 National Boulevard, Suite 100
Los Angeles, California 90064
Telephone: (310) 571-3511
email: ray@averlaw.com

[Proposed] General Insolvency Counsel for
ADVANCE SPECIALTY CARE, LLC
Debtor and Debtor In Possession

UNITED STATES BANKRUPTCY COURT

CENTRAL DISTRICT OF CALIFORNIA [LOS ANGELES DIVISION]

In re:	**Case No. 2:17-bk-24737-RK**
ADVANCE SPECIALTY CARE, LLC,	**Chapter 11**
Debtor.	**[PROPOSED] ORDER GRANTING "MOTION FOR ORDER AUTHORIZING DEBTOR AND DEBTOR IN POSSESSION TO USE CASH COLLATERAL"**
	Date: **Time:** **Place: Courtroom 1675** **Roybal Federal Building** **U.S. Bankruptcy Court** **255 East Temple Street** **Los Angeles, California 90012**

The "Motion For Order Authorizing Debtor and Debtor In Possession To Use Cash Collateral" ("Cash Collateral Motion"), filed on behalf of Advance Specialty Care, LLC ("Debtor"), the chapter 11 debtor and debtor in possession in the above captioned case, came on for hearing on December __, 2017, before the Honorable Robert N. Kwan, in courtroom 1675 of the United

States Bankruptcy Court for the Central District of California [Los Angeles Division], located at 255 East Temple Street, Los Angeles, California 90012.

Appearing on of behalf of Debtor was its proposed general insolvency counsel, Law Offices Of Raymond H. Aver, A Professional Corporation, by Raymond H. Aver, Esquire. Other appearances, if any, are as reflected in the Court's record of the hearing.

The Court having considered the Cash Collateral Motion; and having heard the arguments of counsel; and good cause appearing therefor,

IT IS HEREBY ORDERED that the Cash Collateral Motion is granted.

IT IS FURTHER ORDERED that Debtor is authorized to use the cash collateral in which the Internal Revenue Service ("IRS") claims or may claim to have a lien, for Debtor's ordinary and necessary operating expenses and administrative expenses, in conformity with the Cash Collateral Motion and the Budget, attached as **Exhibit B** to the Declaration Of Moises L. Simbulan in support of the Cash Collateral Motion.

IT IS FURTHER ORDERED that this Order and its terms are immediately operative and fully effective as of the date of the hearing.

###

NOTE: When using this form to indicate service of a proposed order, **DO NOT** list any person or entity in Category I. Proposed orders do not generate an NEF because only orders that have been entered are placed on the CM/ECF docket

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 10801 National Boulevard, Suite 100, Los Angeles, California 90064.

The foregoing document described "**MOTION FOR ORDER AUTHORIZING DEBTOR AND DEBTOR IN POSSESSION TO USE CASH COLLATERAL; MEMORANDUM OF POINTS AND AUTHORITIES; DECLARATION(S) AND EXHIBIT(S) IN SUPPORT THEREOF**" will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner indicated below:

I. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING ("NEF")** – Pursuant to controlling General Order(s) and Local Bankruptcy Rule(s) ("LBR"), the foregoing document will be served by the court via NEF and hyperlink to the document. On **December 19, 2017**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following person(s) are on the Electronic Mail Notice List to receive NEF transmission at the email address(es) indicated below:

Raymond H. Aver	ray@averlaw.com
Thomas J Polis	tom@polis-law.com, paralegal@polis-law.com; r59042@notifybestcase.com
United States Trustee (LA)	ustpregion16.la.ecf@usdoj.gov
Hatty K Yip	hatty.yip@usdoj.gov, dare.law@usdoj.gov, alvin.p.mar@usdoj.gov, kenneth.g.lau@usdoj.gov

___ Service information continued on attached page.

II. SERVED BY U.S. MAIL OR OVERNIGHT MAIL(indicate method for each person or entity served): On **December 19, 2017**, I served the following person(s) and/or entity(ies) at the last known address(es) in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States Mail, first class, postage prepaid, and/or with an overnight mail service addressed as follows. *Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.*

__X__ Service information continued on attached page

III. SERVED BY PERSONAL DELIVERY, FACSIMILE TRANSMISSION OR EMAIL (indicate method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **December 19, 2017**, I served the following person(s) and/or entity(ies) by personal delivery, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. *Listing the judge here constitutes a declaration that personal delivery on the judge will be completed no later than 24 hours after the document is filed.*

Honorable Robert N. Kwan
Bin outside of Suite 1682

___ Service information continued on attached page, declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

December 19, 2017	David Israel	
Date	Name	Signature

SERVICE LIST

VIA FIRST CLASS MAIL

Entity With Interest In Cash Collateral
Internal Revenue Service
P.O. Box 7346
Philadelphia , PA 19101

Employment Development Department
Bankruptcy Group MIC 92E
P.O. Box 826880
Sacramento, California 94280-0001

Debtor
Advance Specialty Care, LLC
3470 Wilshire Boulevard, Suite 600
Los Angeles, CA 90010-3917

Twenty Largest Unsecured Creditors
Angela Varisco
5 R W Cole Drive
South El Monte, CA 91733

Anna Bella Vito
1850 Batson Avenue, #83
Rowland Heights, CA 91748

Asuncion L. Arbasto
7465 Ridgeway Drive
Buena Park, CA 90620

Atlas General Insurance Services
4365 Executive Drive, Suite 400
San Diego, CA 92121

Atlas General Insurance Services
c/o Hatkoff & Minassian
A Law Corproation
18757 Burbank Boulevard, Suite 100
Tarzana, CA 91356

Camille Sierra
417 N. Bonnie Brae Street, Apt. 15
Los Angeles, CA 90026

Cypress Insurance Company
c/o Marcelli Law Offices
940 Enchanted Way, Suite 101
Simi Valley, CA 93065

Emma Borges
c/o Woolls & Peer
One Wilshire Building
624 South Grand Avenue, 22nd Floor
Los Angeles, CA 90017-3876

Irma Fierro
230 College Drive, #F-1
Santa Maria, CA 93454

Jessie M. Orcino
6603 Turnergrove Drive
Lakewood, CA 90713

Joanna Rae Q. Pascual
14022 Sylvanwood Avenue
Norwalk, CA 90650

Kaiser Permanente
P.O. Box 23250
San Diego, CA 92193-3250

Kayla Afemata
15131 South Gibson Avenue
Compton, CA 90221

LV Medical Management
5811 East Beverly Boulevard
Los Angeles, CA 90022

M&K/Katherine C. Taroy
6680 Knott Avenue, #12
Buena Park, CA 90621

Mariano A. Alvarez, Esquire
Law Offices of Mariano A. Alvarez
Hanmi Bank Building
3660 Wilshire Boulevard, Suite 1140
Los Angeles, CA 90010

Milagros A. Victoria
10625 Petit Avenue, #122
Granada Hills, CA 91344

MP Diversified Business
133 West Scenic Drive
Monrovia, CA 91016

Relias Learning
c/o McCarthy, Burgess & Wolff
26000 Cannon Road
Cleveland, OH 44146

RMS Querubin
P.O. Box 394
Fontana, CA 92334

State Compensation Insurance Fund
P.O. Box 8192
Pleasanton, CA 94588

State Compensation Insurance Fund
5880 Owens Drive
2nd Floor, Building B
Pleasanton, CA 94588

State Compensation Insurance Fund
c/o Law Offices of Kenneth J. Freed
14226 Ventura Boulevard
P.O. Box 5914
Sherman Oaks, CA 91413

VIA email AND FIRST CLASS MAIL
United States of America
on behalf of its agency, the Internal Revenue Service
300 North Los Angeles Street
Los Angeles, California 90012
Attn: Jolene Tanner, Esquire
email: jolene.tanner@usdoj.gov