UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF COLORADO

IN RE:)	
)	Case No. 17-21637-KHT
ABC NEIGHBORHOOD DENTAL &)	
ORTHODONTICS, P.C. d/b/a)	
ABC FAMILY DENTAL &)	
ORTHODONTICS)	
)	
EIN: 46-3186392)	Chapter 11
)	
Debtor.)	

AMENDMENT TO AMENDED PLAN OF REORGANIZATION DATED JULY 2, 2018 AND AMENDED DISCLOSURE STATEMENT

The Debtor, ABC Neighborhood Dental & Orthodontics, P.C. d/b/a/ ABC Family Dental & Orthodontics, by and through its attorneys, Kutner Brinen, P.C., hereby submits its amendment to its Amended Plan of Reorganization Dated July 2, 2018 ("Plan") and the Amended Disclosure Statement to Accompany the Plan of Reorganization ("Disclosure Statement") as follows:

- 1. Paragraph 9.16 of the Plan is amended to read as follows:
- 9.16 **Issuance of New Shares**. In the event that Class 7 votes to reject the Plan and the interests held by Class 8 are cancelled, the provisions in this paragraph shall govern the issuance of new interests in each Debtor. On the effective date of the Plan new interests in the Debtor shall be issued to any qualified party in interest who elects to provide the Debtor with a minimum of \$20,000 in cash or property and exchange any claim for such Interest. Any qualified party in interest may elect this choice by providing notice to the affected Debtor through its counsel on or before the hearing on confirmation of the Plan. In the event that multiple parties elect to provide funds to purchase shares, the shares will be prorated among those providing funds, however the minimum amount each party must provide will be \$20,000. All funds used to purchase shares shall be distributed first to Unclassified Priority Claims, then to Class 7 claimants.

2. Section VII.5 of the Disclosure Statement is amended to read as follows:

5. General Unsecured Claims.

Class 7 claimants shall receive a pro-rata distribution of \$1,500 per month for period of five (5) years ("Class 7 Distribution"). Beginning the first full month following the Confirmation Date, the Debtor shall set aside \$1,500 in a segregated account. Each time three months payments have been set aside, the Debtor shall make the Class 7 Distribution to Class 7 creditors on a pro-rata basis.

The Debtor intends to object to the claims of SNAP Advances and National Funding, Inc. ("National Funding"). If the claims of SNAP Advances and National Funding are disallowed, the total amount of allowed Class 7 claims shall be approximately \$576,375.44, and Class 7 claims shall receive approximately 15.6% of their allowed claims over five (5) years. If the claims are allowed in full, the total amount of allowed Class 7 claims shall be approximately \$843,688.62, and Class 7 claimants shall receive approximately 10.7% of their allowed claims over five years.

Dated: November 6, 2018 By: <u>/s/ Keri L. Riley</u>

Jeffrey S. Brinen, #20565 Keri L. Riley, #47605 **KUTNER BRINEN, P.C.** 1660 Lincoln St., Suite 1850 Denver, CO 80264

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