

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF LOUISIANA
LAFAYETTE DIVISION**

IN RE: PROGRESSIVE ACUTE CARE, LLC, *et al.*

**CHAPTER 11
CASE NO.: 16-50740**

**OBJECTION TO THE PAC LIQUIDATION TRUST'S SECOND OMNIBUS
OBJECTION TO CLAIMS**

NOW INTO COURT, through undersigned counsel, comes **IBERIA GASTROENTEROLOGY ASSOCIATES, INC.** (“Debtor”), who respectfully represents:

1.

Matthew E. Rubin, the Liquidation Trustee for the PAC Liquidation Trust (the “Liquidation Trustee”), filed a Second Omnibus Objection To Claims which included an objection to the Iberia Gastroenterology Associates, Inc. Proof (“IGA”) of Claim # 15. This objection is limited to IGA’s Proof of Claim #15.

2.

In particular, the Liquidation Trustee objected to IGA’s claim stating that “further support needed from claimant to determine validity of filed claim. Patient names are required to determine Debtor location of employment for validity.”

3.

IGA’s Proof of Claim #15 contained documents which redacted the requested information as it is sensitive, privileged and confidential. Undersigned counsel, after discussing same with counsel for the Liquidation Trustee, has provided the unredacted Proof of Claim #15 documentation showing the patient names to counsel for the Liquidating Trustee. This information was provided solely for the Liquidating Trustee to further evaluate IGA’s claim and remains sensitive, privileged and confidential and is not to be made public or disseminated in any manner.

4.

IGA maintains that it's claim is valid and that it has provided the requested documentation to the Liquidating Trustee in satisfaction of the Liquidating Trustee's objection.

WHEREFORE, Debtor prays for the entry of an Order denying the Liquidating Trustee's objection to IGA's Proof of Claim #15 and for any and all other general and equitable relief appropriate under the premises.

Respectfully Submitted,
RICHOUX LAW FIRM, L.L.C.
BY: /s/ Rodd C. Richoux
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY, that I have served a copy of the foregoing pleading via ECF email to Wade R. Iverstine, Attorney for PAC Liquidation Trust at wade.iverstine@keanmiller.com and to the Office of the United States Trustee at USTPRegion05.SH.ECF@usdoj.gov, on this the 12th day of December, 2017.

/s/ Rodd C. Richoux
RODD C. RICHOUX