

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

**IN RE:            PROGRESSIVE ACUTE CARE, LLC  
  
                         DEBTOR**

**BANKRUPTCY CASE NO.  
  
16-50740**

**MOBILE IMAGING’S RESPONSE TO THE PAC LIQUIDATION TRUST’S SECOND  
OMNIBUS OBJECTION TO CLAIMS**

Now into court through undersigned counsel comes Mobile Imaging Services, LLC which responds to and opposes the Second Omnibus Objection to Claims as it relates to the claims of Mobile Imaging Services, LLC for the reasons set forth below.

1.

Mobile Imaging filed Proofs of Claim in the amounts of \$71,120.67 and \$27,957.09 for pre-petition debts owed which claims are numbered 8 and 5 on the Claims Register of this Court.

2.

In addition, Mobile Imaging filed post-petition administrative expense claims in the amounts of \$7,600.00 and \$2,240.00 bearing claim numbers 30 and 22 on the Claims Register of this Court.

3.

The Second Omnibus Objection treats the claims of Mobile Imaging as Exhibit 5 claims. The objection alleges that distribution should be withheld to Mobile Imaging pending resolution of “preference offset claims” against Mobile Imaging.

4.

To the knowledge of Mobile Imaging, no preference action has been filed as of the filing of this response. Mobile Imaging was served with a demand letter.

5.

Mobile Imaging does not object to the relief requested to withhold disbursements pending resolution of the preference action as that action relates to unresolved pre-petition claims.

6.

Mobile Imaging does object to the action as it relates to post-petition administrative claims.

7.

Further, Mobile Imaging shows that should this Court grant the relief requested, this Court should require the Trustee to segregate and hold any “withheld disbursements” in escrow pending resolution of the claims.

8.

Mobile Imaging would be prejudiced by any action of the Trustee which would disburse funds to other creditors to which Mobile Imaging might become entitled.

9.

The claims filed by Mobile Imaging constitute prima facie evidence of the validity of the claims. Mobile Imaging reserves all rights to defend and reserve its claims to the extent the Trustee attacks the validity of the claims.

**WHEREFORE MOBILE IMAGING PRAYS** that this response be deemed good and sufficient and that this Court grant the relief requested at page 10 of the Second Omnibus Objection only subject to the reservations and objections raised above.

Respectfully submitted,

**WHEELIS & ROZANSKI**

By: /s/ Stephen D. Wheelis  
Stephen D. Wheelis #17205  
Richard A. Rozanski #22583  
P.O. Box 13199  
Alexandria, Louisiana 71315-3199  
318/445-5600

**ATTORNEYS FOR MOBILE IMAGING  
SERVICES, LLC**

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that the above and foregoing Response has been served upon Debtors, Progressive Acute Care, LLC, Post Office Box 5309, Abita Springs, LA 70420, Barbara B. Parsons, Steffes, Vingiello & McKenzie, LLC, 13702 Coursey Blvd., Bldg. 3, Baton Rouge, LA 70817, Catherine Noel Steffes, 13702 Coursey Blvd., Building 3, Baton Rouge, LA 70817, William E. Steffes, Steffes, Vingiello & McKenzie, LLC, 13702 Coursey Boulevard, Building 3, Baton Rouge, LA 70817, Office of U. S. Trustee, 300 Fannin St., Suite 3196, Shreveport, LA 71101 , by placing a copy of same in the United States mail postage prepaid and/or served electronically.

Alexandria, Louisiana this 12<sup>th</sup> day of December, 2017.

/s/ Stephen D. Wheelis  
OF COUNSEL