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

M-2025-3052793

In re

TRANSCARE CORPORATION, *et al.*,

Debtors.

Chapter 11

Case No. 16-10407 (DSJ)

(Jointly Administered)

**NOTICE OF PRESENTMENT OF THE STIPULATION AND ORDER RESOLVING
CERTAIN CLAIMS BY AND BETWEEN THE TRUSTEE AND PATRIARCH
PARTNERS AGENCY SERVICES, LLC**

PLEASE TAKE NOTICE that on Wednesday, September 17, 2025 at 10:00 a.m.,

Salvatore LaMonica, solely in his capacity as the Chapter 7 Trustee ("Trustee") of the jointly administered estates of TransCare Corporation, TransCare New York, Inc., TransCare ML, Inc., TC Ambulance Group, Inc., TransCare Management Services, Inc., TCBA Ambulance, Inc., TC Billing and Services Corporation, TransCare Westchester, Inc., TransCare Maryland, Inc., TC Ambulance North, Inc. and TransCare Harford County, Inc. TransCare Pennsylvania, Inc., TC Ambulance Corporation and TC Hudson Valley Ambulance Corp. (collectively, "Debtors"), by his counsel, LaMonica Herbst & Maniscalco, LLP, will present the annexed Stipulation and Order ("Stipulation") by and between the Trustee, on behalf of the estate, and Patriarch Partners Agency Services, LLC ("PPAS"), by and through their undersigned counsel, releasing the PPAS Direct Claim (defined therein) as set forth in the Stipulation to the Honorable David S. Jones, United States Bankruptcy Court Judge, United States Bankruptcy Court, Southern District of New York ("Court"), One Bowling Green, Courtroom 701, New York, New York 10004-1408.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Stipulation must be in writing, conform with Title 11 of the United States Code and Federal Rules of Bankruptcy Procedure, state with particularity the grounds therefor and be filed with the Court, with a courtesy

copy to the Chambers of the Honorable David S. Jones, United States Bankruptcy Court Judge, and served upon, so as to be received by, LaMonica Herbst & Maniscalco, LLP, the attorneys for the Trustee, Attn: Gary F. Herbst, Esq., no later than **Wednesday, September 10, 2025 by 5:00 p.m.** (“**Objection Deadline**”) as follows: (i) through the Court’s electronic filing system, which may be accessed through the internet at the Court’s website at www.nysb.uscourts.gov, in portable document format (PDF) using Adobe Exchange Software for conversion; or (ii) if a party is unavailable to file electronically, such party shall submit the objection in PDF format on a portable media in an envelope with the case name, case number, type and title of document; document number to which the objection refers and the file name on the outside of the envelope.

PLEASE TAKE FURTHER NOTICE that if no objections to the Stipulation are filed by the Objection Deadline, the Court may so-Order the Stipulation annexed hereto.

PLEASE TAKE FURTHER NOTICE that if an objection is timely filed to the relief requested in the Stipulation, or if the Court determines that a hearing is appropriate, the Court will schedule a hearing. Notice of such a hearing will be provided by the Trustee.

Dated: August 26, 2025
Wantagh, New York

LAMONICA HERBST & MANISCALCO, LLP
Counsel to Salvatore LaMonica, Chapter 7 Trustee

By: s/ Gary F. Herbst
Gary F. Herbst, Esq.
3305 Jerusalem Avenue, Suite 201
Wantagh, New York 11793
Telephone: 516.826.6500

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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re
TRANSCARE CORPORATION, *et al.*,
Debtors.

Chapter 11
Case No. 16-10407 (DSJ)
(Jointly Administered)

**STIPULATION AND ORDER RESOLVING CERTAIN CLAIMS BY AND BETWEEN
THE TRUSTEE AND PATRIARCH PARTNERS AGENCY SERVICES, LLC**

This *Stipulation and Order* (this "Stipulation") is made by and between Salvatore LaMonica, solely as the Chapter 7 Trustee (the "Trustee") of the jointly-administered estates of TransCare Corporation, TransCare New York, Inc., TransCare ML, Inc., TC Ambulance Group, Inc., TransCare Management Services, Inc., TCBA Ambulance, Inc., TC Billing and Services Corporation, TransCare Westchester, Inc., TransCare Maryland, Inc., TC Ambulance North, Inc. and TransCare Harford County, Inc. TransCare Pennsylvania, Inc., TC Ambulance Corporation and TC Hudson Valley Ambulance Corp. (collectively, the "Debtors"), on the one hand, and Patriarch Partners Agency Services, LLC ("PPAS"), on the other hand, acting by and through their undersigned counsel.

RECITALS

A. On February 24, 2016 and April 25, 2016, the Debtors filed for protection under chapter 7 of the United States Bankruptcy Code, 11 U.S.C. §§ 101-1532 (the "Bankruptcy Code") with this court (the "Court").

B. On October 9, 2017, PPAS filed a Proof of Claim in the amount of not less than \$35,090,492.76. Of that amount, \$568,119.66 was claimed by PPAS on its own behalf (the "PPAS Direct Claim") and the remainder was asserted by PPAS as administrative agent on behalf of

certain lenders to a credit facility (the "TransCare Lenders Claims").

C. On February 7, 2025, the Court entered an Order awarding the Trustee attorney's fees against PPAS in the amount of \$2,765,358.84, plus accruing interest (the "Fee Order"). The Fee Order is currently on appeal.

D. In the interests of promptly closing the Debtor's estates and avoiding further litigation, the Parties have agreed to enter into this Stipulation regarding the PPAS Direct Claim and the Fee Order, subject to approval by this Court.

TERMS AND CONDITIONS

1. PPAS hereby releases the PPAS Direct Claim. For the avoidance of doubt, PPAS also waives and releases any and all claims that it has or could assert on its own behalf against the Debtor's estates. PPAS does not release any claims made or asserted by PPAS as administrative agent for other persons or entities, including but not limited to any of the TransCare Lenders Claims.

2. The Trustee and the estates hereby release PPAS from any and all obligations under the Fee Order, which shall be deemed satisfied upon approval of this Stipulation by the Court. For the avoidance of doubt, the Trustee and the estates also waive and release PPAS from any and all claims the estates have or could assert against PPAS.

3. The Trustee and the estates agree that all of the TransCare Lenders Claims shall be treated the same in terms of allowance, priority, and distribution.

4. The Parties expressly agree and acknowledge that entry into this Stipulation shall not in any way constitute or be deemed to be an admission or concession by any Party as to any matter.

5. The Parties represent and warrant to each other that the signatories to this Stipulation are authorized to execute the Stipulation, that each has full power and authority to enter into this Stipulation and that this Stipulation is duly executed and delivered, and constitutes a valid, binding agreement in accordance with its terms, *provided that*, with respect to the Trustee, this Stipulation requires approval of this Court.

6. This Stipulation constitutes the entire agreement and understanding between the Parties with respect to its subject matter and supersedes all previous or contemporaneous oral or written representations, understandings or agreements with respect thereto.

7. This Stipulation may be executed in counterparts and each such counterpart together with the others shall constitute one and the same instrument, and it shall constitute sufficient proof of this Stipulation to present any copy, copies or facsimiles signed by the Party to be charged.

8. This Court shall retain jurisdiction to resolve any disputes or controversies arising from or related to this Stipulation.

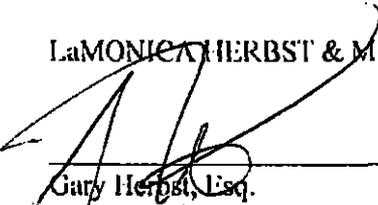
9. This Stipulation shall be governed by the laws of the State of New York and to the extent applicable, the Bankruptcy Code without regard to the State of New York's rules governing the conflict of laws.

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This Stipulation shall not be effective until it is so ordered by this Court.

Dated: August 20, 2025
Wantagh, New York

LaMONICA HERBST & MANISCALCO, L.L.P.

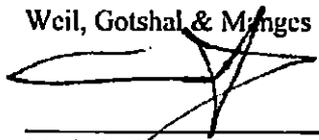


Gary Herbst, Esq.
3305 Jerusalem Avenue
Wantagh, New York 11793
Telephone: (516) 826-6500

Counsel to Salvatore LaMonica, as Trustee

Dated: August 20, 2025
Washington, D.C.

Weil, Gotshal & Manges LLP



Mark A. Perry, Esq.
2001 M Street NW Suite # 600
Washington, D.C. 20036
Telephone: (202) 682-7000

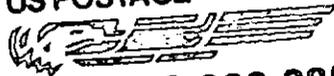
Counsel to Patriarch Partners Agency Services, LLC

IT IS SO ORDERED:

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L.L. Smith, Jr. & Co. Inc. - L.L.P.
3000 Jefferson Blvd. - Suite 100
Wantage, VA 22981

Pennsylvania Public Utility Commission
P.O. Box 61380
Harrisburg, PA 17106-1380

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