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BRIDGE DIAGNOSTICS, LLC,

UNITED STATES BANKRUPTCY COURT

CENTRAL DISTRICT OF CALIFORNIA - SANTA ANA DIVISION

In re  
BRIDGE DIAGNOSTICS, LLC,  
  
Debtor.

Case No. 8:24-bk-10803-TA

Chapter 11 Subchapter V

DEBTOR'S EXPEDITED MOTION FOR  
ORDER AUTHORIZING USE OF CASH  
COLLATERAL TO CONFIRM THAT ITS  
SECURED CREDITOR IS ADEQUATELY  
PROTECTED; MEMORANDUM OF  
POINTS AND AUTHORITIES AND  
DECLARATION OF EDWARD  
BIDANSET AND JASON HANSEN IN  
SUPPORT

Hearing:

Date: April 11, 2024

Time: 10:00 a.m.

Ctrm: 5B

Place: 411 West Fourth Street  
Santa Ana, CA 92701

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1 TO THE HONORABLE THEODOR ALBERT UNITED STATES BANKRUPTCY COURT  
2 JUDGE, THE OFFICE OF THE UNITED STATES TRUSTEE AND ALL INTERESTED  
3 PARTIES:

4 Debtor, BRIDGE DIAGNOSTICS, LLC, (the “Debtor”) in the above-captioned case,  
5 respectfully submits this motion for an order authorizing it to use cash collateral and determining  
6 that its secured creditor is adequately protected (“Motion”) and the declarations of Jason Hansen  
7 (“Hansen Decl.”) and Edward Bidanset (“Bidanset Decl.”) in support. (“Motion”). In support of the  
8 Motion, Debtor respectfully represents as follows:

9 **1. Summary of Argument**

10 As explained below, Debtor is a diagnostic testing center whose inception began around the  
11 beginning of the Covid-19 pandemic, but, due to outstanding accounts receivables guaranteed under  
12 the CARES Act,<sup>1</sup> the Debtor encountered cash flow issues which are actively being addressed. The  
13 Debtor has two pre-petition lenders Blackburn (as defined below) and Debtor’s principal, Mr.  
14 Hansen (as defined below), only one of which perfected his security interest.

15 Debtor needs to the ability to use funds collected as accounts receivable to pay its ongoing  
16 operational expenses, including payroll expense, rent, and utilities. As set forth in the Budget (as  
17 defined below), the Debtor anticipates that it will be cash flow positive beginning in June or July of  
18 this year (and is accrual basis positive for April and May). The Debtor’s secured lender consents to  
19 the use of its cash collateral. Moreover, the Debtor believes that its secured lender is adequately  
20 protected by the outstanding receivables, which are collectible pursuant to the CARES Act.

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27 <sup>1</sup> The Debtor has approximately \$10-15 million in collectible outstanding accounts receivables owed by a  
28 variety of health care insurance companies. Hansen Decl., ¶¶24-25. Pre-petition, the Debtor has retained  
counsel specializing in collection of CARES Act accounts receivables. *Id.*, ¶¶24-25. The Debtor will file an  
employment application for post-petition services of the same counsel. *Id.*, ¶24-25.

1 **2. Background**

2 **A. Debtor's Background and History**

3 The Debtor is a clinical diagnostics laboratory that was founded in April 2020. Hansen Decl.,  
4 ¶8. Originally, the Debtor launched its business to provide infectious disease testing focused on the  
5 Women's Health and Urology markets for conditions such as Bacterial Vaginosis (BV), Human  
6 Papillomavirus Virus (HPV), Sexually Transmitted Infections (STI) and Urinary Tract Infections  
7 (UTI). *Id.*, ¶9.

8 Unfortunately, by the time Debtor leased and built out a laboratory space, purchased lab  
9 equipment, validated test methods, and obtained its CLIA license in third quarter of 2020, the  
10 COVID-19 pandemic was in full force and there was little demand for our Women's Health testing  
11 as very few patients were seeing providers in person. *Id.*, ¶10.

12 There was significant demand for COVID-19 testing and adding the SARS-COV-2 test the  
13 Debtor's laboratory test offering was simple and straightforward, so the Debtor pivoted to primarily  
14 being a COVID testing laboratory. *Id.*, ¶11. Over the next two years, the Debtor's business grew  
15 dramatically, from 5 employees to well over 150 employees, generating millions of COVID testing  
16 revenue from 2020 through 2022. *Id.*, ¶12.

17 In early 2022, the availability of rapid point-of-care COVID testing centers increased and  
18 thus reduced the market share that the Debtor enjoyed at the initial stages of the pandemic. *Id.*, ¶13.  
19 As a result, the Debtor pivoted back to the original business plan to focus on Women's Health and  
20 Urology testing. *Id.*, ¶14. Of note, in April 2022, a favorable Medicare Local Coverage  
21 Determination (LCD) came out supporting the coverage of a PCR-based UTI test. *Id.*, ¶15. Based on  
22 this LCD, the Debtor saw ample opportunity and invested several million dollars into research and  
23 development, sales, and marketing of the Debtor's advanced UTI test. *Id.*, ¶16. After a several month  
24 development process, the Debtor successfully launched and enjoyed initial success in this area. *Id.*,  
25 ¶17.

26 Sadly, a few months later, the Medicare Administrative Contractor (MAC) for the California  
27 market (MolDX) decided to go against the LCD and discontinue coverage/payment of PCR-based  
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1 UTI testing. *Id.*, ¶18. This was a massive blow to the Debtor given the amount of time, resources,  
2 and energy the Debtor devoted to transitioning from a COVID diagnostic testing center to a  
3 Women’s Health and Urology diagnostic testing center. *Id.*, ¶19.

#### 4 **B. Debtor’s Financial Difficulties and the Bankruptcy Purpose**

5 Although the Debtor somewhat successfully navigated the change from a COVID diagnostic  
6 testing center to a Women’s Health and Urology diagnostic testing center, the financial strain  
7 continued. Hansen Decl., ¶20. Specifically, the Debtor has \$10-15 million in collectible outstanding  
8 accounts receivables (“AR”) from COVID-related testing that was backed by the CARES Act. *Id.*,  
9 ¶21. And, post-pandemic, many of the health insurances simply stopped paying the COVID-related  
10 AR to diagnostic testing centers nationwide. *Id.*, ¶22. The lack of consistent collection on the  
11 COVID-AR put a severe strain on the Debtor’s finances. *Id.*, ¶23.<sup>2</sup> Thus, over time, the Debtor was  
12 forced to reduce its workforce substantially, transitioned from an outsized rental unit, and  
13 transitioned, yet again, into a different form of diagnostic testing. *Id.*, ¶26.

14 Moving forward, the Debtor has been successful in validating a Pharmacogenomic (PGx)  
15 test. In light of a recently favorable LCD from MolDX, this new path should generate more market  
16 share and growth. *Id.*, ¶27. In addition to validating the PGx test, the Debtor obtained Z-codes for a  
17 significant array of gene testing as well as its comprehensive testing. *Id.*, ¶28. Obtaining the Z-codes  
18 for this type of testing is important, as, historically, Medicare would not pay for PGx testing absent  
19 the requisite Z-code. *Id.*, ¶29. Given the initial success of the PGx launch, the Debtor anticipates that  
20 it will be profitable in April 2024 on an accrual basis, and cashflow positive in June or July 2024.  
21 *Id.*, ¶30.

#### 22 **C. Debtor’s Secured Lenders**

23 Initially, Debtor believes that that a senior secured lien existed in favor of Mr. Ross  
24 Blackburn (“Blackburn”), in the amount of \$2.5 million (“Alleged Blackburn Lien”). Hansen Decl.,  
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27 <sup>2</sup> Pre-petition, the Debtor retained Crown Medical Collection, a healthcare accounts receivable collection  
28 firm, that focuses heavily on collection of COVID-related AR as set forth in the CARES Act. *Id.*, ¶24. Crown  
has just begun its collections efforts, and will be retained to pursue collection of the COVID-AR in this  
Estate. *Id.*, ¶25.

¶31. However, a review of the UCC search does not indicate that Blackburn perfected his lien prior to the filing of the Petition Date (and the underlying documents were prepared and executed between December 2023 and January 2024). Hansen Decl., ¶32; *see also* Ex. 2, pgs. 17-20. Debtor acknowledges that it was the intent of all parties to have the Alleged Blackburn Lien be fully securitized. Hansen Decl., ¶33. But, since, at the time of this filing, there is no record that the Debtor has found of the perfection of the Alleged Blackburn Lien, the Debtor's proposed budget does not provide for payments to the Alleged Blackburn Lien. *Id.*, Ex. 1, pgs. 15-16. To the extent that Blackburn can provide evidence of perfection, the Debtor will amend the Budget accordingly. Hansen Decl., ¶34.

Additionally, the Debtor's insider, Mr. Hansen, provided secured financing to the Debtor. Mr. Hansen perfected his security interest.<sup>3</sup> The Debtor will pay Mr. Hansen's secured lien (since there is no evidence of perfection of the Blackburn Alleged Lien) pursuant to the terms of that note, which allows for monthly interest payments ("Hansen Lien"). *Id.* Further, Mr. Hansen consents to the use of his cash collateral in this instant matter. Hansen Decl., ¶36.

The Debtor acknowledges that the Budget contemplates a \$500,000 debtor-in-possession loan ("DIP Loan") for April 2024. *Id.*, Ex. 1, pgs. 15-16. The Debtor will not accept funding for a DIP Loan until this Court has approved a post-petition financing motion. Hansen Decl., ¶37; Bidanset Decl., ¶9. The Debtor is currently in negotiations with Blackburn and Mr. Hanson for a DIP Loan. Hansen Decl., ¶38; Bidanset Decl., ¶10. Once terms are finalized, the Debtor will seek approval by this Court for the DIP Loan. Hansen Decl., ¶39; Bidanset Decl., ¶11.

#### **D. The Other UCC-1 Filings**

Debtor acknowledges that there are approximately 28 "active" UCC-1 filings identifying it as the relevant debtor (and various other UCC filings that indicate that the lien is terminated). A true and correct copy of the UCC search is attached to the Bidanset Declaration as Exhibit "2." However, a majority of the liens are for medical equipment, leasing vendors, etc. *Id.*, pgs. 17-20. Some of the

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<sup>3</sup> Admittedly, Mr. Hansen's lien was intended to be a second-priority lien. However, since Mr. Blackburn failed to perfect his lien, Mr. Hansen's lien is a first-priority lien.

collateral (i.e., medical equipment) has been turned back to the lienholder, and thus, the obligations are no longer secured. The remainder of the obligations are being paid in the ordinary course as set forth in the Budget. Hansen Decl., ¶42.

#### **E. Debtor's Accounts Receivable**

As of the filing of this instant case, the Debtor had approximately \$10-\$15 million in collectible outstanding CARES Act accounts receivables. Hansen Decl., ¶21. As stated above, Pre-petition, the Debtor retained Crown Medical Collection, a healthcare accounts receivable collection firm, that focuses heavily on collection of COVID-related AR as set forth in the CARES Act. *Id.*, ¶24. Crown has just begun its collections efforts, and will be retained to pursue collection of the COVID-AR in this Estate. *Id.*, ¶25.

#### **F. Other first day motions**

Contemporaneously with this instant Motion, the Debtor will be filing motions to (1) prohibit utility providers from discontinuing services, (2) authorize Debtor to pay pre-petition wages, (3) authorize Debtor to maintain its current bank accounts and cash management system.

### **3. Legal Argument**

#### **A. The Court may authorize Debtor to use cash collateral**

A debtor may use, sell, or lease property of the estate in the ordinary course of business without court approval. 11 U.S.C. §363(c)(1). But a debtor “may not use, sell or lease cash collateral . . . unless: (A) each entity that has an interest in such cash collateral consents; or (B) the court, after notice and a hearing, authorizes such use, sale, or lease in accordance with the provisions of this section.” 11 U.S.C. §363(c)(2); *see, e.g., Secured Leasing Partners, LP v. ProAlert, LLC (In re ProAlert, LLC)*, 314 B.R. 436, 440 (B.A.P. 9th Cir. 2004).

Here, Debtor seeks to use cash collateral to pay the expenses set forth in the Budget attached to this Motion. *See* Hansen Decl., Ex. 1, pg. 15-16. Debtor submits that payment of the expenses shown in the Budget is within the ordinary course of Debtor's business. *Id.*, ¶¶40-42.

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**B. Secured Lender's collateral is adequately protected**

To the extent that an entity has a valid security interest in the revenues generated by property of the estate, those revenues constitute "cash collateral" under §363(a). The bankruptcy court can authorize use of said cash collateral under § 363(c)(2)(B) if the court determines that the debtor has provided "adequate protection" of the secured creditor's interest in the cash collateral. *See e.g., In re Mellor*, 734 F.2d 1396, 1400 (9th Cir. 1984). Although the term "adequate protection" is not explicitly defined, §361 provides that when adequate protection is required, it may be provided by:

(1) Requiring the trustee to make a cash payment or periodic cash payments to such entity, to the extent that the ... use ... under section 363 of this title ... results in a decrease in the value of such entity's interest in such property;

(2) providing to such entity an additional or replacement lien to the extent that such ... use ... results in a decrease in the value of such entity's interest in such property; or

(3) Granting such other relief ... as will result in the realizing by such entity of the indubitable equivalent in such entity's interest in such property.

11 U.S.C. §361.

Section 361 does not define "interest in property" of which a secured creditor is entitled to adequate protection. But the statute plainly provides that a qualifying interest demands protection only to the extent that the use of the creditor's collateral will result in a decrease in the "value of such entity's interest in such property." 11 U.S.C. §§ 361, 363(e). *See e.g., First Federal Bank of California v. Weinstein (In re Weinstein)*, 227 B.R. 284, 296 (B.A.P. 9th Cir. 1998); *In re Deico Elecs., Inc.*, 139 B.R. 945, 947 (B.A.P. 9th Cir. 1992); *General Electric Mortgage Corp. v. South Village, Inc. (In re South Village, Inc.)*, 25 B.R. 987, 989-90 n.4 (Bankr. D. Utah 1982). The phrase "value of such entity's interest" was addressed by the Supreme Court in *United Savings Assoc. of Texas v. Timbers of Inwood Forest Assoc., Ltd.*, 484 U.S. 365, 108 S. Ct. 626, 98 L. Ed. 2d 740 (1988). *Timbers* instructs that a secured creditor is entitled to adequate protection only against the diminution in the value of the collateral securing the creditor's allowed secured claim. *Id.* at 630 Therefore, where the value of the collateral is not diminishing by its use, sale, or lease, the creditor's

1 interest is adequately protected. Ultimately, what constitutes adequate protection must be decided on  
2 a case-by-case basis. *See, In re Swedeland Dev. Group, Inc.*, 16 F.3d 552, 564 (3d Cir. 1994);  
3 *O'Connor*, 808 F.2d at 1396; *In re Martin*, 761 F.2d 472 (8th Cir. 1985); *In re Shaw Indus., Inc.*, 300  
4 B.R. 861, 865 (Bankr. W.D. Pa. 2003); *In re Columbia Gas Sys., Inc.*, 146 B.R. 114 (Bankr. D. Del.  
5 1992).

6 Courts recognize that an equity cushion<sup>4</sup> provides adequate protection to a secured creditor.  
7 *See In re Mellor*, 734 F.2d 1396 (9th Cir. 1984). There is no minimum amount or percentage of  
8 equity cushion that constitutes adequate protection, but rather, the adequacy of the cushion depends  
9 on the circumstances of each case. *See In re Tucker*, 5 B.R. 180, 183 (Bankr. S.D.N.Y. 1980); *see*  
10 *also In re McGowan*, 3 B.R. 241, 243 (Bankr. E.D. Pa 1980) (holding a cushion of 10% is adequate);  
11 *In re Kost*, 102 B.R. 829, 831-32 (Bankr. D. Wyo 1989) (providing a survey of cases where 20% or  
12 more is considered adequate).

13 The Ninth Circuit has provided guidance as to the amount of an equity cushion that is  
14 sufficient. In *Mellor*, the court held that a 20% equity cushion adequately protected the secured  
15 creditor. *Mellor*, 734 F.2d at 1400. In doing so, the court cited with approval various cases holding  
16 that an equity cushion of 10%-20% is sufficient to protect a creditor. *Id.* at 1401 (citing *In re*  
17 *McGowan*, 6 B.R. 241, 243 (Bankr. E.D. Pa. 1980) (holding that a 10% equity cushion protects a  
18 creditor) and *In re Rodgers Devel. Corp.*, 2 B.R. 679, 685 (Bankr. E.D. Va. 1980) (holding that a  
19 15%-20% equity cushion protects a creditor). Moreover, courts in this district understand *Mellor's*  
20 teaching that an equity cushion from 10%-20% is sufficient to adequately protect a creditor. *See,*  
21 *e.g., In re DBI Housing, Inc.*, 2013 Bankr. LEXIS 2146, \*10 (Bankr. C.D. Cal. 2013) (holding that a  
22 16% equity cushion adequately protects a creditor).

23 Here, as set forth above and as contemplated within the Budget, the Debtor intends to pay the  
24 Hansen Lien in accordance with the terms of the underlying note. Hansen Decl., ¶35; Ex. 1, pgs. 15-  
25 16. Moreover, the Debtor has approximately \$10-15 million in collectible accounts receivable via  
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28 <sup>4</sup> According to *Mellor*, the term “equity cushion” means “the value in the property, above the amount owed to  
the creditor with a secured claim, that will shield that interest from loss due to any decrease in the value of the  
property during the time the automatic stay remains in effective.” 734 at 1400 n.2.

1 the CARES Act. Hansen Decl., ¶21. Pre-petition, the Debtor retained Crown Medical Collection, a  
2 healthcare accounts receivable collection firm, that focuses heavily on collection of COVID-related  
3 AR as set forth in the CARES Act. *Id.*, ¶24. Crown has just begun its collections efforts, and will be  
4 retained to pursue collection of the COVID-AR in this Estate. *Id.*, ¶25.

5 And, the Debtor anticipates that given the initial success of the PGx launch, the Debtor  
6 anticipates that it will be profitable in April 2024 on an accrual basis, and cashflow positive in June  
7 or July 2024. *Id.*, ¶30.

8 **C. The proposed form of order – FRBP 4001(d)(1)(A)**

9 Rule 4001(d)(1)(A) of the Federal Rules of Bankruptcy Procedure requires that a motion for  
10 the authority to use cash collateral or for approval of a cash collateral agreement be accompanied by  
11 a proposed form of order. The proposed form of order is attached to this Motion as Exhibit “3.”  
12 Thus, the Debtor has complied with the FRBP.

13 **D. Required Local Form F4001-2.STMT.FINANCE**

14 As required by Local Bankruptcy Rule 4001-2(a), the Debtor will be filing the required local  
15 form for approval of the use of cash collateral.

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1 **4. Conclusion**

2 The Debtor requests that the Court enter an order as follows:

- 3 (1) Authorizing, on an interim basis pending final hearing on notice to creditors, the Debtor's  
4 immediate use of any cash collateral pursuant to the proposed budget attached as  
5 Exhibit "1," to the Hansen Declaration, with a 15.0% variance;  
6 (2) Determining that the Blackburn Lien, Hansen Lien, and all other secured creditors (to the  
7 extent there are any) are adequately protected; and  
8 (3) Setting a final hearing on this Motion.  
9

10 Dated: April 8, 2024

MARSHACK HAYS WOOD LLP

11  
12 By: /s/ David A. Wood  
13 MATTHEW W. GRIMSHAW  
14 DAVID A. WOOD  
15 Attorneys for  
16 BRIDGE DIAGNOSTICS, LLC  
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**Declaration of Jason Hansen**

I, JASON HANSEN, declare as follows:

1. I am an individual over 18 years of age and competent to make this Declaration.
2. If called upon to do so, I could and would competently testify as to the facts set forth in this Declaration.
3. The facts set forth below are true of my personal knowledge.
4. I am the Managing Member of BRIDGE DIAGNOSTICS, LLC, the Debtor in the above-captioned case ("Debtor").
5. I have been Debtor's Managing Member since Debtor's inception.
6. I make this Declaration in support of Debtor's motion for an order authorizing it to use cash collateral and determining that its secured creditor is adequately protected ("Motion").
7. All terms not defined herein are used as they are defined in the Motion.
8. The Debtor is a clinical diagnostics laboratory that was founded in April 2020.
9. Originally, the Debtor launched its business to provide infectious disease testing focused on the Women's Health and Urology markets for conditions such as Bacterial Vaginosis (BV), Human Papillomavirus Virus (HPV), Sexually Transmitted Infections (STI) and Urinary Tract Infections (UTI). I
10. Unfortunately, by the time Debtor leased and built out a laboratory space, purchased lab equipment, validated test methods, and obtained its CLIA license in third quarter of 2020, the COVID-19 pandemic was in full force and there was little demand for our Women's Health testing as very few patients were seeing providers in person.
11. There was significant demand for COVID-19 testing and adding the SARS-COV-2 test the Debtor's laboratory test offering was simple and straightforward, so the Debtor pivoted to primarily being a COVID testing laboratory.
12. Over the next two years, the Debtor's business grew dramatically, from 5 employees to well over 150 employees, generating millions of COVID testing revenue from

1 2020 through 2022.

2 13. In early 2022, the availability of rapid point-of-care COVID testing centers  
3 increased and thus reduced the market share that the Debtor enjoyed at the initial stages of the  
4 pandemic.

5 14. As a result, the Debtor pivoted back to the original business plan to focus on  
6 Women's Health and Urology testing.

7 15. Of note, in April 2022, a favorable Medicare Local Coverage Determination  
8 (LCD) came out supporting the coverage of a PCR-based UTI test.

9 16. Based on this LCD, the Debtor saw ample opportunity and invested several  
10 million dollars into research and development, sales, and marketing of the Debtor's advanced  
11 UTI test.

12 17. After a several month development process, the Debtor successfully launched and  
13 enjoyed initial success in this area.

14 18. Sadly, a few months later, the Medicare Administrative Contractor (MAC) for the  
15 California market (MolDX) decided to go against the LCD and discontinue coverage/payment of  
16 PCR-based UTI testing.

17 19. This was a massive blow to the Debtor given the amount of time, resources, and  
18 energy the Debtor devoted to transitioning from a COVID diagnostic testing center to a  
19 Women's Health and Urology diagnostic testing center.

20 20. Although the Debtor somewhat successfully navigated the change from a COVID  
21 diagnostic testing center to a Women's Health and Urology diagnostic testing center, the  
22 financial strain continued.

23 21. Specifically, the Debtor has approximately \$10-15 million in collectible  
24 outstanding accounts receivables ("AR") from COVID-related testing that was backed by the  
25 CARES Act.

26 22. And, post-pandemic, many of the health insurances simply stopped paying the  
27 COVID-related AR to diagnostic testing centers nationwide.

28

1           23.     The lack of consistent collection on the COVID-AR put a severe strain on the  
2 Debtor's finances.

3           24.     Pre-petition, the Debtor retained Crown Medical Collection, a healthcare accounts  
4 receivable collection firm, that focuses heavily on collection of COVID-related AR as set forth  
5 in the CARES Act.

6           25.     Crown has just begun its collections efforts, and will be retained to pursue  
7 collection of the COVID-AR in this Estate.

8           26.     Thus, over time, the Debtor was forced to reduce its workforce substantially,  
9 transitioned from an outsized rental unit, and transitioned, yet again, into a different form of  
10 diagnostic testing.

11          27.     Moving forward, the Debtor has been successful in validating a  
12 Pharmacogenomic (PGx) test. In light of a recently favorable LCD from MolDX, this new path  
13 should generate more market share and growth.

14          28.     In addition to validating the PGx test, the Debtor obtained Z-codes for a  
15 significant array of gene testing as well as its comprehensive testing.

16          29.     Obtaining the Z-codes for this type of testing is important, as, historically,  
17 Medicare would not pay for PGx testing absent the requisite Z-code.

18          30.     Given the initial success of the PGx launch, the Debtor anticipates that it will be  
19 profitable in April 2024 on an accrual basis, and cashflow positive in June or July 2024.

20          31.     Debtor believes that that its senior secured lien is in favor of Mr. Ross Blackburn  
21 ("Blackburn"), in the amount of \$2.5 million ("Alleged Blackburn Lien").

22          32.     A review of the UCC search does not indicate that Blackburn perfected his lien  
23 prior to the filing of the Petition Date (and the underlying documents were prepared and  
24 executed between December 2023 and January 2024).

25          33.     Debtor acknowledges that it was the intent of all parties to have the Alleged  
26 Blackburn Lien be fully securitized.

27          34.     To the extent that Blackburn can provide evidence of perfection, the Debtor will  
28

1 amend the Budget accordingly.

2 35. The Debtor will also pay my priority secured lien (since there is no evidence of  
3 perfection of the Blackburn Alleged Lien) pursuant to the terms of that note, which allow for  
4 monthly interest payments ("Hansen Lien").

5 36. I consent to the use of his cash collateral in this instant matter.

6 37. The Debtor will not accept funding for a DIP Loan until this Court has approved a  
7 post-petition financing motion.

8 38. The Debtor is currently in negotiations with Blackburn and myself for a DIP  
9 Loan.

10 39. Once terms are finalized, the Debtor will seek approval by this Court for the DIP  
11 Loan.

12 40. A true and correct copy of the Budget is attached here as Exhibit "1." I am  
13 informed and believe that all expenses are within the Debtor's ordinary course of business.

14 41. A true and correct copy of the UCC search is attached here as Exhibit "2."

15 42. A majority of the liens are for medical equipment, leasing vendors, etc. Some of  
16 the collateral (i.e., medical equipment) has been turned back to the lienholder, or are being paid  
17 in the ordinary course as set forth in the Budget.

18 I declare under penalty of perjury that the foregoing is true and correct. Executed on April 8,  
19 2024.

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21   
22 JASON HANSEN,  
23 MANAGING MEMBER  
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**Declaration of Edward Bidanset**

I, EDWARD BIDANSET, declare as follows:

1. I am an individual over 18 years of age and competent to make this Declaration.
2. If called upon to do so, I could and would competently testify as to the facts set forth in this Declaration.
3. The facts set forth below are true of my personal knowledge.
4. I am a founding partner of Cutsheet Express LLC ("CE").
5. I am the Chief Restructuring Officer ("CRO") of BRIDGE DIAGNOSTICS, LLC, (collectively, the "Debtor") in the above-captioned case.
6. I make this Declaration in support of Debtor's motion for an order authorizing it to use cash collateral and determining that its secured creditor is adequately protected ("Motion").
7. All terms not defined herein are used as they are defined in the Motion.
8. I am informed and believe that all expenses set forth in the Budget are within the ordinary course of business.
9. The Debtor will not accept funding for a DIP Loan until this Court has approved a post-petition financing motion.
10. The Debtor is currently in negotiations with Blackburn and myself for a DIP Loan.
11. Once terms are finalized, the Debtor will seek approval by this Court for the DIP Loan.
12. A true and correct copy of the form of the order granting this Motion is attached here as Exhibit "3."

I declare under penalty of perjury that the foregoing is true and correct. Executed on April  
\_\_\_\_, 2024.

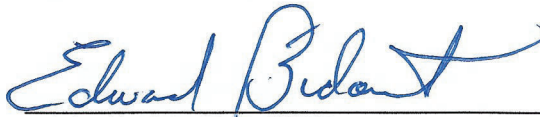
  
EDWARD BIDANSET

**EXHIBIT 1**

Bridge Diagnostics LLC  
13 Week Cash Flow

| WEEKLY CASH PLAN             |               |                |                |                |                |                |
|------------------------------|---------------|----------------|----------------|----------------|----------------|----------------|
|                              | 1<br>4/5/24   | 2<br>4/12/24   | 3<br>4/19/24   | 4<br>4/26/24   | 5<br>5/3/24    | 6<br>5/10/24   |
| <b>Beginning Cash</b>        | 79,490        | 38,955         | 316,558        | 260,068        | 659,168        | 431,608        |
| <b>Ending Cash</b>           | 38,955        | 316,558        | 260,068        | 659,168        | 431,608        | 391,608        |
| <b>COLLECTIONS</b>           |               |                |                |                |                |                |
| Total Samples                | 90            | 240            | 340            | 450            | 560            | 570            |
| Medicare %                   | 80%           | 50%            | 40%            | 30%            | 25%            | 25%            |
| Total Revenue                | 54,100        | 115,500        | 149,900        | 180,300        | 213,100        | 216,900        |
| RPS                          | 601           | 481            | 441            | 401            | 381            | 381            |
| <b>Collections</b>           | -             | -              | -              | <b>49,100</b>  | <b>81,900</b>  | <b>92,800</b>  |
| Available Cash               | 79,490        | 38,955         | 316,558        | 309,168        | 741,068        | 524,408        |
| <b>SPEND</b>                 |               |                |                |                |                |                |
| <i>Firm Spend</i>            |               |                |                |                |                |                |
| Payroll & Benefits           | -             | 105,197        | -              | 77,600         | 30,700         | 112,000        |
| Operating Overhead           | 30,535        | 95,400         | 47,050         | 72,400         | 221,820        | 20,800         |
| Debt Service (Secured)       | -             | -              | -              | -              | 25,700         | -              |
| Subscription (prev Amex)     | -             | -              | 9,440          | -              | 9,440          | -              |
| Chapter 11 Administration    | -             | 1,500          | -              | -              | 1,500          | -              |
| Available Cash after Firm    | 48,955        | (163,142)      | 260,068        | 159,168        | 451,908        | 391,608        |
| <i>Additional Consulting</i> |               |                |                |                |                |                |
| Total Additional             | 10,000        | 20,300         | -              | -              | 20,300         | -              |
| <b>Total Spend</b>           | <b>40,535</b> | <b>222,397</b> | <b>56,490</b>  | <b>150,000</b> | <b>309,460</b> | <b>132,800</b> |
| <b>New DIP Financing</b>     | -             | 500,000        | -              | 500,000        | -              | -              |
| <b>Ending Cash</b>           | <b>38,955</b> | <b>316,558</b> | <b>260,068</b> | <b>659,168</b> | <b>431,608</b> | <b>391,608</b> |

Bridge Diagnostics LLC  
13 Week Cash Flow

| WEEKLY CASH PLAN             | 7<br>5/17/24   | 8<br>5/24/24   | 9<br>5/31/24   | 10<br>6/7/24   | 11<br>6/14/24  | 12<br>6/21/24  | 13<br>6/28/24  |
|------------------------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|
| <b>Beginning Cash</b>        | 391,608        | 402,006        | 385,006        | 495,006        | 240,946        | 405,546        | 509,046        |
| <b>Ending Cash</b>           | 402,006        | 385,006        | 495,006        | 240,946        | 405,546        | 509,046        | 653,146        |
| <b>COLLECTIONS</b>           |                |                |                |                |                |                |                |
| Total Samples                | 570            | 570            | 570            | 570            | 570            | 570            | 570            |
| Medicare %                   | 25%            | 25%            | 25%            | 25%            | 25%            | 25%            | 25%            |
| Total Revenue                | 216,900        | 216,900        | 216,900        | 216,900        | 216,900        | 216,900        | 216,900        |
| RPS                          | 381            | 381            | 381            | 381            | 381            | 381            | 381            |
| <b>Collections</b>           | <b>92,100</b>  | <b>100,500</b> | <b>130,800</b> | <b>154,300</b> | <b>185,400</b> | <b>214,800</b> | <b>216,900</b> |
| Available Cash               | 483,708        | 502,506        | 515,806        | 649,306        | 426,346        | 620,346        | 725,946        |
| <b>SPEND</b>                 |                |                |                |                |                |                |                |
| <i>Firm Spend</i>            |                |                |                |                |                |                |                |
| Payroll & Benefits           | 8,902          | 96,700         | -              | 119,700        | -              | 90,500         | -              |
| Operating Overhead           | 72,800         | 20,800         | 20,800         | 231,720        | 20,800         | 20,800         | 72,800         |
| Debt Service (Secured)       | -              | -              | -              | 25,700         | -              | -              | -              |
| Subscription (prev Amex)     | -              | -              | -              | 9,440          | -              | -              | -              |
| Chapter 11 Administration    | -              | -              | -              | 1,500          | -              | -              | -              |
| Available Cash after Firm    | 402,006        | 385,006        | 495,006        | 261,246        | 405,546        | 509,046        | 653,146        |
| <i>Additional Consulting</i> |                |                |                |                |                |                |                |
| Total Additional             | -              | -              | -              | 20,300         | -              | -              | -              |
| <b>Total Spend</b>           | <b>81,702</b>  | <b>117,500</b> | <b>20,800</b>  | <b>408,360</b> | <b>20,800</b>  | <b>111,300</b> | <b>72,800</b>  |
| <b>New DIP Financing</b>     | -              | -              | -              | -              | -              | -              | -              |
| <b>Ending Cash</b>           | <b>402,006</b> | <b>385,006</b> | <b>495,006</b> | <b>240,946</b> | <b>405,546</b> | <b>509,046</b> | <b>653,146</b> |

**EXHIBIT 2**

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Secretary of State

Business

UCC

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## UCC Search

Print

UCC Documents have been processed through: 03/27/2024

**Disclaimer:** This tool allows you to search the California Secretary of State's Uniform Commercial Code database for abstracts of information for lien notices that have been filed with this office. The UCC Search is updated as documents are filed. The data provided is not a complete or certified record.

bridge diagnostics, llc



Advanced ▾

Results: 45

| UCC Type ▴ ▾ | Debtor Information ▴ ▾               | File Number ▴ ▾ | Secured Party Info ▴ ▾                               | Status ▴ ▾ | Filing Date ▴ ▾ | Lapse Date ▴ ▾ |
|--------------|--------------------------------------|-----------------|------------------------------------------------------|------------|-----------------|----------------|
| UCC >        | BRIDGE DIAGNOSTICS, LLC - IRVINE, CA | U220117998540   | THERMO FISHER FINANCIAL SERVICES, INC. - WALTHAM, MA | Active     | 01/13/2022      | 01/13/2027     |
| UCC >        | BRIDGE DIAGNOSTICS, LLC - IRVINE, CA | U230004553925   | FINANCIAL AGENT SERVICES - SPRINGFIELD, IL           | Active     | 01/19/2023      | 01/19/2028     |
| UCC >        | BRIDGE DIAGNOSTICS - IRVINE, CA      | U220119952333   | GENPROBE INSTRUMENTS - SAN DIEGO, CA                 | Active     | 01/20/2022      | 01/20/2027     |
| UCC >        | BRIDGE DIAGNOSTICS - IRVINE, CA      | U220119952434   | GENPROBE INSTRUMENTS - SAN DIEGO, CA                 | Active     | 01/20/2022      | 01/20/2027     |
| UCC >        | BRIDGE DIAGNOSTICS, LLC - IRVINE, CA | U220120491226   | THERMO FISHER FINANCIAL SERVICES, INC. - WALTHAM, MA | Active     | 01/24/2022      | 01/24/2027     |
| UCC >        | BRIDGE DIAGNOSTICS, LLC - IRVINE, CA | U220163040011   | THERMO FISHER FINANCIAL SERVICES, INC. - WALTHAM, MA | Active     | 02/11/2022      | 02/11/2027     |
| UCC >        | BRIDGE DIAGNOSTICS, LLC - IRVINE, CA | U230015736220   | TECAN U.S., INC. - MORRISVILLE, NC                   | Active     | 03/02/2023      | 03/02/2028     |
| UCC >        | BRIDGE DIAGNOSTICS, LLC - IRVINE, CA | U230015736523   | TECAN U.S., INC. - MORRISVILLE, NC                   | Active     | 03/02/2023      | 03/02/2028     |
| UCC >        | BRIDGE DIAGNOSTICS, LLC - IRVINE, CA | U210028181327   | THERMO FISHER FINANCIAL SERVICES, INC. - WALTHAM, MA | Active     | 03/04/2021      | 03/04/2026     |
| UCC >        | BRIDGE DIAGNOSTICS, LLC - IRVINE, CA | U210030954735   | THERMO FISHER FINANCIAL SERVICES, INC. - WALTHAM, MA | Terminated | 03/16/2021      | 03/16/2026     |

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|        | Business |   | UCC                                  |               |                                                      |            |            |            |
|--------|----------|---|--------------------------------------|---------------|------------------------------------------------------|------------|------------|------------|
|        |          |   |                                      |               |                                                      |            |            |            |
| Home   | UCC      | > | BRIDGE DIAGNOSTICS, LLC - IRVINE, CA | U210033013420 | THERMO FISHER FINANCIAL SERVICES, INC. - WALTHAM, MA | Terminated | 03/24/2021 | 03/24/2026 |
| Search | UCC      | > | BRIDGE DIAGNOSTICS, LLC - IRVINE, CA | U220179776838 | THERMO FISHER FINANCIAL SERVICES, INC. - WALTHAM, MA | Terminated | 03/30/2022 | 03/30/2027 |
| Forms  | UCC      | > | BRIDGE DIAGNOSTICS, LLC - IRVINE, CA | U220180688026 | THERMO FISHER FINANCIAL SERVICES, INC. - WALTHAM, MA | Active     | 04/01/2022 | 04/01/2027 |
| Help   | UCC      | > | BRIDGE DIAGNOSTICS, LLC - IRVINE, CA | U210041264936 | THERMO FISHER FINANCIAL SERVICES, INC. - WALTHAM, MA | Terminated | 04/26/2021 | 04/26/2026 |
|        | UCC      | > | BRIDGE DIAGNOSTICS, LLC - IRVINE, CA | U220193873235 | BAYCAP LLC - REDONDO BEACH, CA                       | Active     | 05/16/2022 | 05/16/2027 |
|        | UCC      | > | BRIDGE DIAGNOSTICS, LLC - IRVINE, CA | 207779102994  | THERMO FISHER FINANCIAL SERVICES, INC. - WALTHAM, MA | Active     | 05/18/2020 | 05/18/2025 |
|        | UCC      | > | BRIDGE DIAGNOSTICS, LLC - IRVINE, CA | 207779209730  | DE LAGE LANDEN FINANCIAL SERVICES, INC. - WAYNE, PA  | Terminated | 05/19/2020 | 05/19/2025 |
|        | UCC      | > | BRIDGE DIAGNOSTICS, LLC - IRVINE, CA | U220206239630 | THERMO FISHER FINANCIAL SERVICES, INC. - WALTHAM, MA | Terminated | 06/29/2022 | 06/29/2027 |
|        | UCC      | > | BRIDGE DIAGNOSTICS, LLC - IRVINE, CA | 207799785842  | THERMO FISHER FINANCIAL SERVICES, INC. - WALTHAM, MA | Terminated | 06/30/2020 | 06/30/2025 |
|        | UCC      | > | BRIDGE DIAGNOSTICS - IRVINE, CA      | U230049813637 | HOLOGIC SALES AND SERVICE, LLC - MARLBOROUGH, MA     | Active     | 07/14/2023 | 07/14/2028 |
|        | UCC      | > | BRIDGE DIAGNOSTICS - IRVINE, CA      | U230049814235 | HOLOGIC SALES AND SERVICE, LLC - MARLBOROUGH, MA     | Active     | 07/14/2023 | 07/14/2028 |
|        | UCC      | > | BRIDGE DIAGNOSTICS - IRVINE, CA      | U230049814639 | HOLOGIC SALES AND SERVICE, LLC - MARLBOROUGH, MA     | Active     | 07/14/2023 | 07/14/2028 |
|        | UCC      | > | BRIDGE DIAGNOSTICS, LLC - IRVINE, CA | U200000270213 | THERMO FISHER FINANCIAL SERVICES, INC. - WALTHAM, MA | Terminated | 07/15/2020 | 07/15/2025 |
|        | UCC      | > | BRIDGE DIAGNOSTICS, LLC - IRVINE, CA | U210074532320 | THERMO FISHER FINANCIAL SERVICES, INC. - WALTHAM, MA | Terminated | 08/11/2021 | 08/11/2026 |

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|        | Business |   | UCC                                           |               |                                                                              |            |            |            |
|--------|----------|---|-----------------------------------------------|---------------|------------------------------------------------------------------------------|------------|------------|------------|
|        |          |   |                                               |               |                                                                              |            |            |            |
| Home   | UCC      | > | BRIDGE<br>DIAGNOSTICS,<br>LLC - IRVINE,<br>CA | U200013014519 | THERMO FISHER<br>FINANCIAL<br>SERVICES, INC. -<br>WALTHAM, MA                | Active     | 08/18/2020 | 08/18/2025 |
| Search | UCC      | > | BRIDGE<br>DIAGNOSTICS,<br>LLC - IRVINE,<br>CA | U210078258130 | THERMO FISHER<br>FINANCIAL<br>SERVICES, INC. -<br>WALTHAM, MA                | Active     | 08/24/2021 | 08/24/2026 |
| Forms  | UCC      | > | BRIDGE<br>DIAGNOSTICS,<br>LLC - IRVINE,<br>CA | U210079548632 | THERMO FISHER<br>FINANCIAL<br>SERVICES, INC. -<br>WALTHAM, MA                | Terminated | 08/27/2021 | 08/27/2026 |
| Help   | UCC      | > | BRIDGE<br>DIAGNOSTICS,<br>LLC - IRVINE,<br>CA | U210079561225 | THERMO FISHER<br>FINANCIAL<br>SERVICES, INC. -<br>WALTHAM, MA                | Terminated | 08/27/2021 | 08/27/2026 |
|        | UCC      | > | BRIDGE<br>DIAGNOSTICS,<br>LLC - IRVINE,<br>CA | U200015971328 | BAYCAP LLC -<br>REDONDO<br>BEACH, CA                                         | Active     | 09/02/2020 | 09/02/2025 |
|        | UCC      | > | BRIDGE<br>DIAGNOSTICS,<br>LLC - IRVINE,<br>CA | U210081900825 | THERMO FISHER<br>FINANCIAL<br>SERVICES, INC. -<br>WALTHAM, MA                | Terminated | 09/07/2021 | 09/07/2026 |
|        | UCC      | > | BRIDGE<br>DIAGNOSTICS,<br>LLC - IRVINE,<br>CA | U200020290825 | THERMO FISHER<br>FINANCIAL<br>SERVICES, INC. -<br>WALTHAM, MA                | Active     | 09/18/2020 | 09/18/2025 |
|        | UCC      | > | BRIDGE<br>DIAGNOSTICS,<br>LLC - IRVINE,<br>CA | U200020581621 | CORPORATION<br>SERVICE<br>COMPANY, AS<br>REPRESENTATIVE<br>- SPRINGFIELD, IL | Terminated | 09/21/2020 | 09/21/2025 |
|        | UCC      | > | BRIDGE<br>DIAGNOSTICS,<br>LLC - IRVINE,<br>CA | U220229477641 | THERMO FISHER<br>FINANCIAL<br>SERVICES, INC. -<br>WALTHAM, MA                | Terminated | 09/23/2022 | 09/23/2027 |
|        | UCC      | > | BRIDGE<br>DIAGNOSTICS,<br>LLC - IRVINE,<br>CA | U210088268436 | THERMO FISHER<br>FINANCIAL<br>SERVICES, INC. -<br>WALTHAM, MA                | Active     | 09/27/2021 | 09/27/2026 |
|        | UCC      | > | BRIDGE<br>DIAGNOSTICS,<br>LLC - IRVINE,<br>CA | U210090894841 | THERMO FISHER<br>FINANCIAL<br>SERVICES, INC. -<br>WALTHAM, MA                | Terminated | 10/05/2021 | 10/05/2026 |
|        | UCC      | > | BRIDGE<br>DIAGNOSTICS,<br>LLC - IRVINE,<br>CA | U230073276224 | JASON HANSEN -<br>LAGUNA BEACH,<br>CA                                        | Active     | 10/17/2023 | 10/17/2028 |
|        | UCC      | > | BRIDGE<br>DIAGNOSTICS,<br>LLC - IRVINE,<br>CA | U210094451634 | THERMO FISHER<br>FINANCIAL<br>SERVICES, INC. -<br>WALTHAM, MA                | Terminated | 10/19/2021 | 10/19/2026 |
|        | UCC      | > | BRIDGE<br>DIAGNOSTICS,<br>LLC - IRVINE,<br>CA | U220237986540 | THERMO FISHER<br>FINANCIAL<br>SERVICES, INC. -<br>WALTHAM, MA                | Terminated | 10/24/2022 | 10/24/2027 |
|        | UCC      | > | BRIDGE<br>DIAGNOSTICS,<br>LLC - IRVINE,<br>CA | U200032277529 | BAYCAP LLC -<br>REDONDO<br>BEACH, CA                                         | Active     | 11/18/2020 | 11/18/2025 |

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| Business                                                           |       | UCC                                  |               |                                                      |        |            |            |
|--------------------------------------------------------------------|-------|--------------------------------------|---------------|------------------------------------------------------|--------|------------|------------|
| <div>Home</div> <div>Search</div> <div>Forms</div> <div>Help</div> |       | LLC - IRVINE, CA                     |               |                                                      |        |            |            |
|                                                                    | UCC > | BRIDGE DIAGNOSTICS, LLC - IRVINE, CA | U200038246934 | METROPOLITAN CAPITAL BANK & TRUST - CHICAGO, IL      | Active | 11/24/2020 | 11/24/2025 |
|                                                                    | UCC > | BRIDGE DIAGNOSTICS, LLC - IRVINE, CA | U210105786123 | THERMO FISHER FINANCIAL SERVICES, INC. - WALTHAM, MA | Active | 11/29/2021 | 11/29/2026 |
|                                                                    | UCC > | BRIDGE DIAGNOSTICS, LLC - IRVINE, CA | U210108207422 | THERMO FISHER FINANCIAL SERVICES, INC. - WALTHAM, MA | Active | 12/07/2021 | 12/07/2026 |
|                                                                    | UCC > | BRIDGE DIAGNOSTICS, LLC - IRVINE, CA | U200038197232 | BAYCAP LLC - REDONDO BEACH, CA                       | Active | 12/18/2020 | 12/18/2025 |
|                                                                    | UCC > | BRIDGE DIAGNOSTICS, LLC - IRVINE, CA | U220253547420 | THERMO FISHER FINANCIAL SERVICES, INC. - WALTHAM, MA | Active | 12/21/2022 | 12/21/2027 |
|                                                                    | UCC > | BRIDGE DIAGNOSTICS, LLC - IRVINE, CA | U210112728423 | THERMO FISHER FINANCIAL SERVICES, INC. - WALTHAM, MA | Active | 12/23/2021 | 12/23/2026 |

1

**EXHIBIT 3**

MATTHEW W. GRIMSHAW, #210424  
grimshaw@marshackhays.com  
DAVID A. WOOD, #272406  
dwood@marshackhays.com  
MARSHACK HAYS WOOD LLP  
870 Roosevelt, Irvine, CA 92620  
Telephone: 949-333-7777  
Facsimile: 949-333-7778

Attorneys for Debtor,  
BRIDGE DIAGNOSTICS, LLC,

UNITED STATES BANKRUPTCY COURT  
CENTRAL DISTRICT OF CALIFORNIA - SANTA ANA DIVISION

In re  
BRIDGE DIAGNOSTICS, LLC,  
Debtor.

Case No. 8:24-bk-10803-TA

Chapter 11 Subchapter V

PROPOSED ORDER AUTHORIZING  
DEBTOR'S USE OF CASH  
COLLATERAL TO CONFIRM THAT ITS  
SECURED CREDITOR IS ADEQUATELY  
PROTECTED

Hearing:

Date: April 11, 2024

Time: 10:00 a.m.

Ctrm: 5B

Place: 411 West Fourth Street  
Santa Ana, CA 92701

On April 11, 2024, at 10:00 a.m., a hearing ("Hearing") was held on an emergency basis before the Honorable Theodor C. Albert, United States Bankruptcy Judge, regarding BRIDGE DIAGNOSTICS, LLC's ("Debtor") motion for an order authorizing it to use cash collateral and determining that its secured creditor is adequately protected ("Motion").

Having determined that service of the Motion was proper under the circumstances, and after considering the Motion and all papers in support thereof, the presentation of counsel, and for good cause shown, the Court rules as follows:

///

///

**IT IS HEREBY FOUND** as follows:

1. On March 29, 2024 (“Petition Date”), Debtor filed a voluntary chapter 11 petition, electing proceed under subchapter V.

2. Mr. Jason Hansen has a lien against Debtor's assets ("Hansen Lien"), including its accounts receivable ("Receivables"). The Receivables constitute the Mr. Hansen's cash collateral ("Cash Collateral").

3. Debtor has the immediate need for use of the Cash Collateral to continue its business operations and in order to avoid immediate and irreparable harm.

4. Mr. Hansen has consented to the use of cash collateral by the Debtor.

Based on the foregoing, it is

**HEREBY ORDERED** as follows:

1. Debtor is authorized to use Cash Collateral to pay its normal and customary operating expenses, including those shown in the Budget attached to the Motion.

2. The equity cushion protecting the Hansen Lien is sufficient to constitute adequate protection within the meaning of 11 U.S.C. §361. No further adequate protection is required.

3. A final hearing on the Motion is scheduled for \_\_\_\_\_, 2024. Debtor may, but is not required to, file a supplement to the Motion by \_\_\_\_\_, 2024. Any objection to Motion (or supplement thereto) shall be filed on or before \_\_\_\_\_. Debtor may file a reply brief to any objection by \_\_\_\_\_, 2024.

###

## 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:  
870 Roosevelt, Irvine, CA 92620.

A true and correct copy of the foregoing document entitled: **DEBTOR'S MOTION FOR USE OF CASH COLLATERAL** 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 **April 6, 2024**, 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       , 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:** Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **April 8, 2024**, 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.

|                                                                                                                                                                                                                     |                                                                                        |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------|
| <b>VIA PERSONAL DELIVERY:</b><br><b>PRESIDING JUDGE'S COPY</b><br>HONORABLE THEODOR C. ALBERT<br>UNITED STATES BANKRUPTCY COURT<br>411 WEST FOURTH STREET, SUITE 5085 /<br>COURTROOM 5B<br>SANTA ANA, CA 92701-4593 | <b>DEBTOR – VIA EMAIL</b><br>BRIDGE DIAGNOSTIC, LLC<br>Jason Hansen<br>Edward Bidanset |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------|

☒ 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.

April 8, 2024  
Date

Layla Buchanan  
Printed Name

/s/ Layla Buchanan  
Signature

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** CONTINUED:

- **TRUSTEE: Robert Paul Goe (TR)** bktrustee@goeforlaw.com, kwareh@goeforlaw.com;bkadmin@goeforlaw.com;C187@ecfcbis.com;kmurphy@goeforlaw.com;rgoe@goeforlaw.com
- **ATTORNEY FOR U.S. TRUSTEE: Queenie K Ng** queenie.k.ng@usdoj.gov
- **U.S. TRUSTEE: United States Trustee (SA)** ustpregion16.sa.ecf@usdoj.gov
- **ATTORNEY FOR DEBTOR: David Wood** dwood@marshackhays.com, dwood@ecf.courtdrive.com;lbuchananmh@ecf.courtdrive.com;alinares@ecf.courtdrive.com

3: VIA FACSIMILE and OVERNIGHT MAIL and VIA EMAIL:

**CREDITOR – VIA EMAIL**

AIRSPACE TECHNOLOGIES, INC.

**CREDITOR – VIA EMAIL**

APOLLO COURIERS INC.

**CREDITOR – VIA EMAIL**

ELLKAY, LLC

**CREDITOR – VIA EMAIL**

HAMILTON COMPANY

**CREDITOR – VIA EMAIL**

HOLOGIC SALES AND SERVICES, LLC

**CREDITOR – VIA EMAIL**

MEDCARE MSO, LLC

**CREDITOR – VIA EMAIL**

SALES SEARCH AMERICA

**CREDITOR – VIA EMAIL**

SIRIUS COMPUTER SOLUTIONS, INC.

**CREDITOR – VIA EMAIL**

TECAN US INC

**CREDITOR – VIA EMAIL**

TXPSI, LLC

**CREDITOR – VIA EMAIL**

U.S. HEALTHTEK, INC.

**CREDITOR – VIA EMAIL**

VEOLIA ENVIRONMENTAL SERVICES

**CREDITOR – VIA EMAIL**

XIFIN, INC.

**CREDITOR – VIA EMAIL**

KRYSTAL REED, INDIVIDUALLY AND ON BEHALF OF OTHERS SIMILARLY SITUATED  
C/O IAN M. SILVERS / BISNAR CHASE LLP

**CREDITOR – VIA FAX**

ALFRED LUI, MD, INC.

**CREDITOR – VIA FAX**

ANTHEM BLUE CROSS

**CREDITOR – VIA FAX**

DAVID WRIGHT TREMAINE, LLP

**CREDITOR – VIA OVERNIGHT MAIL**

FEDEX - 2451-0  
ATTN: OFFICER, A MANAGING OR GENERAL AGENT, OR TO ANY OTHER AGENT AUTHORIZED BY APPOINTMENT OR LAW TO RECEIVE SERVICE OF PROCESS  
PO BOX 7221  
PASADENA, CA 91109-7321

UNABLE TO LOCATE FAX OR EMAIL ADDRESS; NO ANSWER AT ANY PHONE NUMBER

**CREDITOR – VIA OVERNIGHT MAIL**

INNOVATIVE MEDICAL MANAGEMENT LLC  
ATTN: OFFICER, A MANAGING OR GENERAL AGENT, OR TO ANY OTHER AGENT AUTHORIZED BY APPOINTMENT OR LAW TO RECEIVE SERVICE OF PROCESS  
4175 E. LA PALMA AVENUE, SUITE 215  
ANAHEIM, CA 92807-1864

UNABLE TO LOCATE FAX OR EMAIL ADDRESS; NO ANSWER AT ANY PHONE NUMBER

**CREDITOR – VIA OVERNIGHT MAIL**

THE IRVINE COMPANY  
ATTN: OFFICER, A MANAGING OR GENERAL AGENT, OR TO ANY OTHER AGENT AUTHORIZED BY APPOINTMENT OR LAW TO RECEIVE SERVICE OF PROCESS  
662322 - S23399  
550 NEWPORT CENTER DRIVE  
NEWPORT BEACH, CA 92660

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662322 - S23399  
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LOS ANGELES, CA 90084-6462

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WAVELAND RCM, LLC  
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KING OF PRUSSIA, PA 19406-1316

WEBSITE DOES NOT EXIST ANYMORE;  
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