

Scott J. Freedman, Esq.
DILWORTH PAXSON LLP
457 Haddonfield Road, Suite 700
Cherry Hill, NJ 08002
Telephone: (856) 675-1962
Facsimile: (856) 249-5098
Email: sfreedman@dilworthlaw.com

-and-

Jennifer L. Maleski, Esq.
DILWORTH PAXSON LLP
1500 Market Street, Suite 3500E
Philadelphia, PA 19102
Telephone: (215) 575-7000
Email: jmaleski@dilworthlaw.com

Counsel to NJM Insurance Group

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

In re:	:	Chapter 11
	:	
SHELTERING ARMS CHILDREN AND FAMILY	:	Case No. 24-41037 (JMM)
SERVICES, INC.,	:	
	:	
Debtor.	:	

**RESERVATION OF RIGHTS OF NJM INSURANCE GROUP TO FIRST MONTHLY
FEE STATEMENT SUBMITTED BY THE WAGNER GROUP, FOR THE PERIOD
FROM MARCH 7, 2024 THROUGH MAY 31, 2024**

1. On March 7, 2024 (the "**Petition Date**"), Sheltering Arms Children and Family Services, Inc. (the "**Debtor**") filed for voluntary bankruptcy relief pursuant to Chapter 11 of the Bankruptcy Code.

2. On June 20, 2024, The Wagner Group ("**Wagner**"), special pension benefits counsel for the Debtor in this bankruptcy case, submitted its First Monthly Fee Statement

(the "**Fee Statement**") for the period from March 7, 2024 through May 31, 2024 (the "**Compensation Period**").

3. In the Fee Statement, The Wagner Group advises that its total fees for the Compensation Period are \$61,313.50 and requests payment of \$49,050.80 (80% of the total fees) from the Debtor's bankruptcy estate.

4. As of and subsequent to the Petition Date, NJM Insurance Group ("**NJM**") provides certain worker's compensation insurance coverage to the Debtor pursuant to a policy that expires July 1, 2024 and is not being renewed (the "**Policy**"). Pursuant to terms of the Policy, NJM invoiced the Debtor for certain post-petition premiums that were not paid.

5. NJM holds an administrative claim against the Debtor's bankruptcy estate for an undetermined amount (the "**NJM Admin Claim**") for unpaid premiums owed for post-petition periods. The exact amount of the NJM Admin Claim will be determined by NJM upon the completion of the premium audit for the policy (which will occur after the policy expires).

6. While NJM is not objecting to the Fee Request at this time, it hereby reserves all rights to object to any future Fee Requests or Fee Applications submitted by Wagner and the payment of any fees to Wagner to the extent the NJM Claim is not paid by the Debtor and the estate becomes administratively insolvent.

Dated: June 26, 2024
Philadelphia, Pennsylvania

/s/ Jennifer L. Maleski

DILWORTH PAXSON LLP

Jennifer L. Maleski

1500 Market Street, Suite 3500E

Philadelphia, PA 19102

Telephone: (215)575-7000

Facsimile: (215)575-7200

Email: jmaleski@dilworthlaw.com

Scott J. Freedman, Esq.
DILWORTH PAXSON LLP
457 Haddonfield Road, Suite 700
Cherry Hill, NJ 08002
Telephone: (856) 675-1962
Facsimile: (856) 249-5098
Email: sfreedman@dilworthlaw.com

-and-

Jennifer L. Maleski, Esq.
DILWORTH PAXSON LLP
1500 Market Street, Suite 3500E
Philadelphia, PA 19102
Telephone: (215) 575-7000
Email: jmaleski@dilworthlaw.com

Counsel to NJM Insurance Group

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

In re:	:	Chapter 11
	:	
SHELTERING ARMS CHILDREN AND FAMILY	:	Case No. 24-41037 (JMM)
SERVICES, INC.,	:	
	:	
	:	
Debtor.	:	

CERTIFICATE OF SERVICE

The undersigned certifies that on June 26, 2024, a copy of Reservation of Rights of NJM Insurance Group To First Monthly Fee Statement Submitted By The Wagner Group, For The Period From March 7, 2024 Through May 31, 2024 was served via the Court's electronic noticing to all parties requesting such service and via email to the parties on the attached service list.

Dated: June 26, 2024
Philadelphia, Pennsylvania

/s/ Jennifer L. Maleski

DILWORTH PAXSON LLP

Jennifer L. Maleski

1500 Market Street, Suite 3500E

Philadelphia, PA 19102

Telephone: (215)575-7000

Facsimile: (215)575-7200

Email: jmaleski@dilworthlaw.com

Sheltering Arms Children and Family Services, Inc.

Case No. 24-41037-JMM

Reservation of Rights Service List

Name	Attn	Email Address
Garfunkel Wild, P.C.	Attn: Adam T. Berkowitz	aberkowitz@garfunkelwild.com
The Wagner Law Group	Attn: Harold J. Ashner, Esq.	Hashner@wagnerlawgroup.com
25 Broadway Office Properties	Attn: Neil H. Kosher, Controller	neil@wolfsongroup.com
American Express	Attn: Matthew Heimann, GCO	matthew.heimann@aexp.com
Apex Mechanical Corp.		natashal@apexmechcorp.com
Briscoe Protective Systems Inc.		accounting@briscoeprotective.com
Corp Counsel for the City of New York		zkass@law.nyc.gov
HealthFirst		yhassan@healthfirst.org
IMA Systems LLC		naomi@imasys.com
Malapero Prisco & Klauber, LLP		defense@malaperoprisco.com ; aklauber@malaperoprisco.com
NYC Dept. of Youth & Community Development		tdawkins@dycd.nyc.gov
NYS Department of Labor	Attn: Karen Cacace; Seth Kupferberg	karen.cacace@ag.ny.gov ; seth.kupferberg@ag.ny.gov
NYS Office of the Medicaid Inspector Gen		collections@omig.ny.gov
Office of the U.S. Trustee Eastern District of NY	Attn: Jeremy S. Sussman, Esq.	jeremy.s.sussman@usdoj.gov
Olshan Frome Wolosky LLP	Attn: Joseph Weiner	jweiner@olshanlaw.com
Pension Benefit Guaranty Corporation	Attn: Zoe C. Wadge	wadge.zoe@pbgc.gov
Pride Healthcare LLC		tim.tobin@pride-health.com ; accounting@pride-health.com
Quantum Strategies, LLC		william.rizzo@qs2500.com ; accounting@qs2500.com
TemPositions Health Care, Inc.		rjainarine@tempositions.com ; gavancena@tempositions.com
Tsafon Associates, LLC	c/o Braun Management Inc.	info@braunre.com
Sheltering Arms NY		jpincus@shelteringarmsny.org
Lease Direct		sfantini@leasedirect.com
Iron Mountain		lea.yco@ironmountain.com
		jvaron@ntst.com
		joseph.cardieri@acs.nyc.gov