UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION
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IN RE:	Chapter 11 Cases
TRAJECTOR HOLDINGS, LLC,[1]	Case No. 3:26-bk-03286
BENEFITS GROUP HOLDINGS, LLC,	Case No. 3:26-bk-03289
TRAJECTOR MEDICAL, LLC,	Case No. 3:26-bk-03291
INFINITE IP LLC,	Case No. 3:26-bk-03293
PERFECT PATH, LLC,	Case No. 3:26-bk-03295
TRAJECTOR ADMIN SERVICES, LLC,	Case No. 3:26-bk-03296
BENEFITS INSURANCE, LLC,	Case No. 3:26-bk-03297
MYLER INSURANCE SERVICES HOLDINGS, LLC,	Case No. 3:26-bk-03298
ANCHORSIX SERVICES, LLC,	Case No. 3:26-bk-03299
ATVANTAGE, LLC,	Case No. 3:26-bk-03300
TRAJECTOR MEDIA SERVICES, LLC,	Case No. 3:26-bk-03301
GLOBALTEK BPO LLC,	Case No. 3:26-bk-03302
MYLER DISABILITY HOLDINGS, LLC,	Case No. 3:26-bk-03304
MYLER DISABILITY, LLC,	Case No. 3:26-bk-03306
ADDUCO MEDIA, LLC,	Case No. 3:26-bk-03307
TRAJECTOR DISABILITY, LLC,	Case No. 3:26-bk-03308
CONTACT CENTER 1, LLC,	Case No. 3:26-bk-03309
BENEFITS KARMA, LLC,	Case No. 3:26-bk-03310
EXECUTIVE STAFFING SOLUTIONS, PLLC,	Case No. 3:26-bk-03311
AMPRY HOLDINGS, LLC,	Case No. 3:26-bk-03312
CONCIERGE STAFFING SERVICE MANAGEMENT, LLC,	Case No. 3:26-bk-03314
TRAJECTOR, INC.,	Case No. 3:26-bk-03315
Debtors.	(Joint Administration Pending)

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DECLARATION OF MARK C. HEALY IN SUPPORT OF
CHAPTER 11 PETITIONS AND FIRST DAY RELIEF

[1] The Debtors' mailing address is 5950 NW 1st Place, Suite 200, Gainesville, FL 32607. The last four digits of each Debtor's federal tax identification number are: (i) Trajector Holdings, LLC (7528); (ii) Benefits Group Holdings, LLC (2029); (iii) Trajector Medical, LLC (5243); (iv) Infinite IP LLC (3723); (v) Perfect Path, LLC (3494); (vi) Trajector Admin Services, LLC (2231); (vii) Benefits Insurance, LLC (9835); (viii) Myler Insurance Services Holdings, LLC (3606); (ix) AnchorSix Services, LLC (5009); (x) Atvantage, LLC (7384); (xi) Trajector Media Services, LLC (7509); (xii) Globaltek BPO LLC (1684); (xiii) Myler Disability Holdings, LLC (9924); (xiv) Myler Disability, LLC (0845); (xv) Adduco Media, LLC (0257); (xvi) Trajector Disability, LLC (5136); (xvii) Contact Center 1, LLC (2329); (xviii) Benefits Karma, LLC (1850); (xix) Executive Staffing Solutions, PLLC (1841); (xx) Ampry Holdings, LLC (2323); (xxi) Concierge Staffing Service Management, LLC (2814); and (xxii) Trajector, Inc. (2128).

I, Mark C. Healy, hereby declare that the following is true to the best of my knowledge, information, and belief:

1. I am the Chief Restructuring Officer (the "CRO") of Trajector Holdings, LLC ("Trajector Holdings") and its affiliated debtors and debtors in possession (collectively, the "Debtors," the "Company," or "Trajector"), having been appointed on June 22, 2026. I continue to serve as CRO for the Debtors, as debtors and debtors in possession in the above-captioned chapter 11 cases (the "Chapter 11 Cases").

2. I am the Executive Vice President of Michael Moecker & Associates, Inc. ("MMA"), an insolvency and fiduciary services firm. I have substantial restructuring and insolvency experience and have served in federal and state courts as, among other roles, a chief restructuring officer, chapter 11 trustee, receiver, assignee, liquidation agent, and distribution agent. My representations have spanned a broad range of industries, including retail, medical, hospitality, IT equipment and services, military, government, automotive, construction, financial services, non-profit and import/export. Prior to joining MMA, I worked in commercial banking for sixteen years and served for four years as the CFO for a residential developer and golf course management company. I have also served as an expert witness in chapter 11 plan confirmation proceedings. MMA has substantial experience in providing fiduciary and consulting services to assist distressed businesses in large and complex insolvency cases.

3. Prior to the Petition Date, the Debtors retained MMA in connection with their financial and operational restructuring, and MMA agreed to provide my services as CRO, together with the services of certain additional personnel. As MMA's lead professional on the engagement and as CRO of the Debtors, I and others working under my direction have become familiar with the Debtors' businesses, financial affairs, debt structure, assets, contractual

arrangements, operations, and strategic challenges. I have been assisting the Debtors with respect to evaluating their capital structure and analyzing potential strategic alternatives. Accordingly, I have acquired substantial background and information regarding the Debtors that will assist me in providing effective and efficient services to the Debtors with the many issues that may arise in the context of these Chapter 11 Cases.

4. Trajector is a mission-driven services organization that helps the underserved and at-risk disabled population pursue disability and related benefits from government agencies. Millions of Americans struggle to secure their disability benefits due to a lack of awareness, confusing and complicated eligibility and documentation standards, and burdensome procedures. Through its two principal businesses—Trajector Medical and Trajector Disability—the Company empowers individuals in underserved communities to obtain the full benefit of the health, financial, and social programs for which they qualify, with the goal of helping its clients live healthier and higher-quality lives.

5. On the date hereof (the "Petition Date"), the Debtors each commenced a voluntary case under chapter 11 of Title 11 of the United States Code (the "Bankruptcy Code") in the United States Bankruptcy Court for the Middle District of Florida (the "Court") and continue to operate their business and manage their properties as debtors in possession. The principal purpose of these Chapter 11 Cases is to stabilize the Debtors' businesses and implement a value-maximizing restructuring for the benefit of the Debtors' estates and stakeholders in accordance with the Bankruptcy Code.

6. To minimize any adverse effects on their estates as a result of the commencement of these Chapter 11 Cases, the Debtors have filed certain motions, applications and other papers seeking various types of "first day" relief (including all attachments and exhibits thereto and any

amendments, collectively, the "First Day Filings").[2] The First Day Filings seek relief aimed, among other things, to establish the foundation for the smooth and efficient entry into Chapter 11 and the administration of these Chapter 11 Cases. The relief requested in the First Day Filings is paramount to the success of the Debtors' efforts to preserve and maximize the value of their estates.

7. I have reviewed the Debtors' chapter 11 petitions and the First Day Filings, or otherwise had the contents thereof explained to me, and to the best of my knowledge, and after reasonable inquiry, I believe that the relief sought in each First Day Filing: (i) is necessary to enable the Debtors to efficiently enter into, and to operate in, chapter 11 with minimal disruption or loss of productivity or value; (ii) constitutes a critical element to the Debtors' efforts to preserve value and maximize creditor and stakeholder recoveries; and (iii) best serves the Debtors' estates and all parties in interest. Further, it is my belief that the relief sought in the First Day Filings is narrowly tailored and necessary to achieve the goals of these Chapter 11 Cases. The facts set forth in each of the First Day Filings are incorporated herein by reference.

8. I submit this declaration ("Declaration") to assist the Court and parties in interest in understanding the Debtors' businesses, capital structure, circumstances leading to the commencement of these Chapter 11 Cases, as well as to support the Debtors' petitions and the First Day Filings. Except as otherwise indicated, I have personal knowledge of the matters set forth in this Declaration, and all statements and facts set forth herein are based upon my personal knowledge, discussions with the Debtors' senior management and the Debtors' professionals, my and the Debtors' management's review of the Debtors' books and records, relevant documents and other information prepared or collected by the Debtors' professionals, or my opinion based

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[2] Capitalized terms used by not otherwise defined herein shall have the meanings ascribed to them in the relevant First Day Filing(s).

upon my experience, knowledge, and information regarding the Debtors' operations and financial condition. In making my statements based upon my review of the Debtors' books and records, relevant documents and other information prepared or collected by the Debtors' professionals and representatives, I have relied upon those professionals and representatives accurately recording, preparing or collecting such documentation and other information.

9. I am authorized to submit this Declaration on behalf of the Debtors. I am over the age of eighteen, and if called to testify as a witness in this matter, I could and would competently testify to each of the statements and facts set forth herein.

10. This Declaration is organized into three parts. **Part I** provides background information about the Debtors, including their past and current business operations, their corporate and capital structure, and the circumstances leading up to the filing of these Chapter 11 Cases. **Part II** summarizes the Debtors' primary objectives in these Chapter 11 Cases. **Part III** sets forth the evidentiary basis for the relief sought in each of the First Day Filings.

PART I
BACKGROUND

A. OVERVIEW OF BUSINESS OPERATIONS

11. ***Trajector***. The Company's name—Trajector—is rooted in the goal of creating an upward trajectory for its clients and its organization. The Company works to protect clients from the wrongful denial of benefits for which they are qualified. Accessing healthcare and benefit programs in the United States is often a complex and inefficient journey, and many people leave significant disability compensation on the table or are wrongfully denied benefits to which they are entitled. Against this backdrop, the Company's mission is to develop medical evidence and otherwise help people with disabilities pursue the benefits for which they are qualified.

12. The Company serves clients who have historically been underserved in the United States—veterans and people with disabilities. Trajector's team members use technology and decades of refined learning to help clients better understand, access, and navigate benefit programs, including by developing the medical evidence necessary to pursue U.S. Department of Veterans Affairs ("VA") disability benefits, and by representing and assisting clients before the Social Security Administration ("SSA"). While the Company is a data-driven enterprise, it approaches each client individually—endeavoring to bring clarity to the complex, to act efficiently, and to conduct its activities with integrity—in order to chart a path toward a potential improved trajectory in its clients' lives.

13. Trajector Holdings serves as a holding company for two principal businesses: Trajector Medical, LLC ("Trajector Medical") and Trajector Disability, LLC ("Trajector Disability"). In 2025, the Debtors had gross revenues of approximately $279,787,000. As of June 30, 2026, the Debtors have realized gross revenues of approximately $81,501,000.

14. ***Trajector Medical***. Trajector Medical provides expert medical evidence development and documentation services to support its clients' claims for benefits from the VA with the goal of helping clients live healthier and higher-quality lives. For more than a decade, Trajector Medical's licensed nurse practitioners and registered nurses have helped veterans gather the medical evidence that matters most in the benefits determination process. Every VA disability decision, for example, requires proof of three elements: a current medical condition or disability; an event, injury, or illness during active duty; and a link—known as a nexus—between the two. That critical connection between service and current condition must be supported by medical evidence; without it, veterans with legitimate conditions face delays or denials of the benefits to which they are entitled.

15. Trajector Medical's core services include conducting one-on-one sessions with licensed medical professionals, reviewing medical histories and records to identify relevant conditions, mapping symptoms to diagnoses and causal factors, documenting accurate and clinically sound medical evidence, and providing veterans with comprehensive reports that can be submitted to the VA in support of their disability applications. Trajector Medical's services complement the work of VA-accredited representatives—attorneys, agents, and veterans service organizations who prepare, present, and prosecute claims before the VA—by ensuring that veterans have complete and credible medical evidence before submitting their applications.

Trajector Medical does not act as a representative before the VA. The Company's mission on the medical-evidence side is to make sure every veteran has access to clear, credible medical documentation so that his or her story can be told completely and considered fairly by VA decision-makers.

16. ***Trajector Disability***. Trajector Disability provides expert advocacy and support services concerning the Social Security Disability Insurance ("SSDI") and Supplemental Security Income ("SSI") processes, including assisting clients with verifying eligibility, establishing disability, building medical evidence, managing the associated paperwork, filing claims, and pursuing appeals of disability determinations. Originally known as Myler Disability, in 2021, the business was rebranded as Trajector Disability and continues to focus exclusively on helping its clients obtain the benefits they deserve.

17. To receive SSDI or SSI benefits, a claimant must demonstrate a disability that is expected to last for at least one year or result in death; other factors—including income, the severity of the disability, and the claimant's ability to work or change careers—also affect eligibility. Trajector Disability's licensed disability advocates guide clients through each stage of the application process: checking eligibility based on disability type, income, and work history; gathering medical evidence—including doctor's notes, laboratory results, imaging, and supporting statements—to provide a clear picture of the disability to the SSA; assembling all necessary documents and filing the claim; and, if the initial claim is denied, pursuing the appeals process on the client's behalf. Trajector Disability's advocates are licensed professionals who represent claimants before the SSA, and the Trajector Disability business does not involve any medical consulting.

18. ***Employees***. As of the Petition Date, the Company employs approximately 458 employees and 17 independent contractors, which include licensed medical professionals, medical records analysts and documentation specialists, medical research analysts, administrative and case management personnel, IT staff, and support services.

B. CORPORATE ORGANIZATION

19. The first business in the Trajector family of companies was founded in 2014 by James S. Hill, II, Gina G. Uribe, and Richard S. Blaser. From those origins, the Company grew into the enterprise that exists today, comprising the Trajector Medical and Trajector Disability businesses and their affiliated entities.

20. James S. Hill, II is a founder and a Manager of the Company. Mr. Hill, a disabled Navy veteran, also serves as the Chief Executive Officer of Trajector. Gina G. Uribe is a founder and Manager of the Company, and also serves as Chief Medical Officer.

21. As of the Petition Date, the Debtors' leadership is comprised of the following individuals:

Name	Position
James S. Hill, II	Chief Executive Officer
Kevin Frain	Chief Financial Officer
Mark C. Healy	Chief Restructuring Officer
Gina G. Uribe	Chief Medical Officer
Damon Thayer	General Counsel

22. The Debtors' principal operations are in Florida and Utah.

23. An organizational chart illustrating the Debtors' corporate structure as of the Petition Date is attached hereto as **Exhibit A**.

24. Trajector Holdings is a Delaware limited liability company. The equity interests in Trajector Holdings are held as follows: (i) entities affiliated with and controlled by Mr. Hill—Blackfin Capital, LLC (42.43%) and Turner Raymond & Associates LLC (2.23%)—holding approximately 44.67% in the aggregate; (ii) entities affiliated with and controlled by Ms. Uribe—White Blaze Medical Consulting LLC (19.12%), Ginken Medical LLC (23.31%), and Venture Strategy LLC (2.23%)—holding approximately 44.67% in the aggregate; (iii) Richard Blaser Revocable Trust LLC (10.54%); and (iv) certain other holders, specifically AKH Enterprises, Inc. (0.03%), DMS Holdings, Inc. (0.03%), and Epifanio Payams (0.07%).

25. Trajector Holdings is manager-managed. Mr. Hill and Ms. Uribe are the sole managers of the Company.

26. Trajector Holdings holds 100% of the equity interests in Benefits Group Holdings, LLC ("Benefits Group Holdings"), a Delaware limited liability company, which in turn holds 100% of the equity interests in the following Debtors: Trajector Medical, LLC, Infinite IP LLC, Perfect Path, LLC, Trajector Admin Services, LLC, Benefits Insurance, LLC, AnchorSix Services, LLC, Trajector Media Services, LLC, Globaltek BPO LLC, Myler Disability Holdings, LLC, Trajector Disability, LLC, and Contract Center 1, LLC.

27. Debtor Benefits Insurance, LLC holds 100% of the equity interests in Debtor Myler Insurance Services Holdings, LLC.

28. Debtor AnchorSix Services, LLC holds 85% of the equity interests in Debtor Atvantage, LLC.

29. Debtor Myler Disability Holdings, LLC holds 100% of the equity interests in Debtor Myler Disability, LLC and Debtor Adduco Media, LLC.

30. The equity interests in Debtor Benefits Karma, LLC are held as follows: (i) Blackfin Capital, LLC (controlled by Mr. Hill) (45%); (ii) Ginken Medical LLC (controlled by Ms. Uribe) (45%); and (iii) Richard S. Blaser Irrevocable Trust (controlled by Mr. Blaser) (10%).

31. The equity interests in Debtor Executive Staffing Solutions, PLLC are held as follows: (i) Blackfin Capital, LLC (controlled by Mr. Hill) (45%); (ii) Ginken Medical LLC (controlled by Ms. Uribe) (45%); and (iii) Richard S. Blaser Irrevocable Trust (controlled by Mr. Blaser) (10%).

32. The equity interests in Debtor Ampry Holdings, LLC are held as follows: (i) Blackfin Capital, LLC (controlled by Mr. Hill) (45%); (ii) Ginken Medical LLC (controlled by Ms. Uribe) (45%); and (iii) Richard S. Blaser Revocable Trust (controlled by Mr. Blaser) (10%).

33. The equity interests in Debtor Concierge Staffing Service Management, LLC are held as follows: (i) Blackfin Capital, LLC (controlled by Mr. Hill) (45%); (ii) Ginken Medical LLC (controlled by Ms. Uribe) (45%); and (iii) Richard S. Blaser Revocable Trust (controlled by Mr. Blaser) (10%).

34. Mr. Hill holds 100% of the equity interests in Debtor Trajector, Inc.

C. THE PREPETITION CAPITAL STRUCTURE OF THE DEBTORS

a. The Deutsche Bank Credit Facility

35. On April 14, 2021, Benefits Group Holdings, Trajector Holdings, certain subsidiaries of the Benefits Group Holding party thereto as Guarantor Subsidiaries,[3] the lenders from time to time party thereto (the "Lenders"), and Deutsche Bank AG New York Branch ("DBNY"), as administrative agent (in such capacity, the "Administrative Agent") and as collateral agent (in such capacity, the "Collateral Agent"), entered into that certain Credit and Guaranty Agreement (as amended, restated, supplemented, or otherwise modified from time to time, the "Credit Agreement"), providing for a senior secured term loan facility (the "Deutsche Bank Credit Facility"). The Lenders include Regions Bank, Siemens Financial Services, Inc., and Stifel Bank & Trust.

36. Pursuant to the Credit Agreement, the Lenders made initial term loans to the Benefits Group Holdings in an aggregate principal amount of $75,000,000 (the "Initial Term Loans"), the proceeds of which were used, among other things, to repay certain existing indebtedness of the Company's predecessor group and to pay related transaction costs. Regions Bank later made incremental term loans in an aggregate principal amount of $20,000,000 (the "Incremental Term Loans," and together with the Initial Term Loans, the "Term Loans").

37. The Credit Agreement has been amended on several occasions since 2021. Most recently, Benefits Group Holdings, Trajector Holdings, the Guarantor Subsidiaries, and the Lenders entered into the Seventh Amendment to the Credit Agreement, dated as of June 3, 2026 (the "Seventh Amendment"), pursuant to which, among other things, the Lenders agreed to

[3] Each of the Guarantor Subsidiaries are Debtors, consisting of the following entities: Adduco Media, LLC, AnchorSix Services, LLC, Atvantage, LLC, Benefits Insurance, LLC, Contact Center 1, LLC, Myler Disability, LLC, Myler Disability Holdings, LLC, Myler Insurance Services Holdings, LLC, Perfect Path, LLC, Trajector Admin Services LLC, Trajector Disability, LLC, Trajector Media Services, LLC, and Trajector Medical, LLC.

extend the stated maturity of the Term Loans and the parties modified certain financial and reporting covenants. The Term Loans under the Credit Agreement originally matured on April 14, 2026, and, pursuant to the Sixth Amendment dated as of April 9, 2026, the maturity date was extended to May 29, 2026. Under the Seventh Amendment, the maturity date of the Term Loans was extended to July 28, 2026.

38. The obligations of Benefits Group Holdings under the Credit Agreement are unconditionally guaranteed, on a joint and several basis, by Trajector Holdings and by each of the Guarantor Subsidiaries party thereto.[4]

39. The obligations under the Credit Agreement are secured pursuant to that certain Pledge and Security Agreement, dated April 14, 2021 (as amended, restated, supplemented, or otherwise modified from time to time, the "Pledge and Security Agreement"), by and among Trajector Holdings, Benefits Group Holdings, the other grantors party thereto (collectively, the "Grantors"), and DBNY, as Collateral Agent. Pursuant to the Pledge and Security Agreement, each Grantor granted to the Collateral Agent, for the benefit of the Secured Parties, a first-priority security interest in and continuing lien on substantially all of its personal property (subject to certain customary exclusions for Excluded Assets), including accounts, chattel paper, documents, general intangibles, goods (including inventory and equipment), instruments, intellectual property and intellectual property licenses, investment related property (including deposit accounts and securities accounts), letter of credit rights, money, receivables, pledged equity interests, and pledged debt, together with all proceeds thereof. The Collateral Agent also

[4] The obligors under the Credit Agreement are: Benefits Group Holdings, Trajector Holdings, Adduco Media, LLC, AnchorSix Services, LLC, Atvantage, LLC, Benefits Insurance, LLC, Contact Center 1, LLC, Myler Disability, LLC, Myler Disability Holdings, LLC, Myler Insurance Services Holdings, LLC, Perfect Path, LLC, Trajector Admin Services LLC, Trajector Disability, LLC, Trajector Media Services, LLC, and Trajector Medical, LLC.

has a security interest in certain of the Debtors' deposit accounts which is perfected by control pursuant to deposit account control agreements.

40. As of the Petition Date, the aggregate outstanding principal balance under the Deutsche Bank Credit Facility was approximately $62.9 million, together with accrued and unpaid interest, fees, and other amounts payable thereunder.

b. Unsecured Obligations

41. In the ordinary course, the Debtors incur trade debt with certain vendors, suppliers, and taxing authorities in connection with the operation of their business, together with other unsecured obligations. As of the Petition Date, the Debtors' estimate that they have outstanding unsecured obligations totaling approximately $2,450,136 in the aggregate.

D. EVENTS LEADING TO THE FILING OF THE CHAPTER 11 CASES

a. Deterioration of the Founders' Relationship

42. As described above, the Company was founded in 2014 by Mr. Hill, Ms. Uribe, and Mr. Blaser, with Mr. Hill and Ms. Uribe acting as managers of Trajector Holdings since 2021. For most of the Company's history, Mr. Hill and Ms. Uribe enjoyed a productive partnership and close working relationship. That relationship has since become strained. Recently, cooperation has given way to conflict, and the Company has been required to devote substantial management, legal, and financial resources to matters that do not serve its clients or employees.

43. The following describes the governance disputes and impasse that, together with the other factors described in this Declaration, led to the commencement of these Chapter 11 Cases. Because I was not retained as CRO until after the events described below had substantially occurred, my understanding of these facts is derived from my discussions with the

Debtors' management and in-house counsel and my review of the Debtors' corporate records, including the Trajector Holdings, LLC limited liability company agreement (the "LLC Agreement"), board minutes, and the 2024 Addendum described below, as well as the publicly available court filings in the Delaware Litigation described below.

44. I understand that, in early 2026, in light of escalating disputes between Mr. Hill and Ms. Uribe, the Company's in-house counsel engaged independent outside counsel to conduct a privileged and confidential investigation into certain matters concerning the Company's governance and personnel. Nothing in this Declaration is intended to, and the Debtors do not, waive the attorney-client privilege, the attorney work-product protection, or any other applicable privilege or protection with respect to that investigation, including its scope, subject matter, methodology, witness interviews, findings, or conclusions. The summary set forth below does not rely upon or recite any privileged analysis or findings of that investigation.

45. On August 15, 2024, a board meeting was held at which Mr. Hill and Ms. Uribe adopted a clear decision-making process recognizing that Mr. Hill, as CEO, has authority to make all business decisions for the Company, and Ms. Uribe executed an addendum to the minutes of that meeting expressly memorializing this determination (the "2024 Addendum"). For a period, Mr. Hill managed the Company's operations based on the understanding in the 2024 Addendum. Beginning in mid-2025, Ms. Uribe resumed more active involvement in the business, which gave rise to differing views among Company leadership regarding the allocation of decision-making authority under the 2024 Addendum.

46. Beginning in early 2026, disputes arose between Ms. Uribe, on the one hand, and Mr. Hill and members of the Company's management and legal personnel, on the other hand, regarding the Company's governance and financial affairs. The Company and its management

dispute the merits of Ms. Uribe's positions in these disputes. These disputes consumed significant amounts of management time, generated substantial instability within the Company, posed risks to employee attrition, and materially increased the Company's legal and administrative expenses, including fees paid to at least four outside law firms.

47. Among other things, the disputes described above coincided with and affected the Company's efforts to refinance its maturing senior secured indebtedness, including by creating a risk of disruption to the Company's ongoing discussions with its existing lenders and prospective new lenders at a critical juncture. The Company focused on maintaining consistent lender engagement, as reflected in the contemporaneous credit agreement amendments and related requirements described above.

48. Despite the Company's efforts to resolve these issues internally in 2025 and in 2026, including through a two-day mediation with a professional mediator in April 2026, the parties were unable to resolve their disputes regarding the LLC Agreement through ordinary corporate governance, which left the Company unable to act decisively at a pivotal moment and necessitated recourse to the courts, as described below.

b. The Company's Governance Structure and Management Impasse

49. From inception, the founders of Trajector agreed that Ms. Uribe would have ultimate voting authority with respect to the Company's technical medical consulting operations, while Mr. Hill would have ultimate voting authority on all other matters, including all business, corporate strategy, legal, and finance decisions. This division of voting authority was reflected in a variety of the Company's corporate documents, and, ultimately, in the Trajector Holdings LLC Agreement, pursuant to which Mr. Hill and Ms. Uribe serve as the sole managers of the Company.

50. Consistent with that arrangement, Section 6.01(b) of the LLC Agreement provides that, in the event the two managers do not unanimously agree on any matter, Ms. Uribe "shall have ultimate managerial decision making authority with respect to the technical medical consulting operations of the Company and its Subsidiaries including medical strategies and medical consulting techniques, processes and procedures," and Mr. Hill "shall have ultimate managerial decision making authority with respect to all other non-medical consulting operations of the Company and its Subsidiaries including, without limitation, decisions relating to corporate strategy, growth, negotiations, contracts, mergers, and acquisitions."

51. In addition, to the extent any matters set forth in the LLC Agreement or under Delaware law require the consent of the Company's members, Section 7.10 of the LLC Agreement provides that, so long as entities affiliated with Mr. Hill and Ms. Uribe hold at least 60% of the Company's units, the affirmative vote of those affiliated entities (defined as the "Majority Members") constitutes a decision of the members, and in the event the Majority Members do not unanimously agree, the Uribe-affiliated members have ultimate decision-making authority with respect to technical medical consulting operations while the Hill-affiliated members have ultimate decision-making authority with respect to all other non-medical consulting operations.

52. Section 6.04(b) of the LLC Agreement provides that the Company's officers, including Mr. Hill as CEO, have such duties, rights, powers, and authority as the Managers may prescribe from time to time. Consistent with these provisions, on August 15, 2024, Mr. Hill and Ms. Uribe held a meeting at which they adopted a clear decision-making process recognizing that Mr. Hill, as CEO, has authority to make all business decisions for the Company, and Ms. Uribe executed the 2024 Addendum memorializing that determination.

53. In early 2026, the Company confronted the imminent maturity of the Deutsche Bank Credit Facility. The Company worked for months to secure a replacement credit facility from a new lender. However, the prospective new lender conditioned any new facility on, among other things, confirmation by the Company's principals, including Ms. Uribe, that Mr. Hill has ultimate authority to enter into the new credit facility and with respect to all decisions that do not involve technical medical consulting, including the Company's Social Security Disability operations. The Company's principals were unable to reach agreement on that confirmation. As a result of the continuing impasse, the Company faced the prospect of an imminent default under the Deutsche Bank Credit Facility, which would have exposed the Company and its subsidiary guarantors to immediate liability for the outstanding term loan indebtedness of approximately $62.9 million, plus interest and fees.

c. The Delaware Litigation Related to Impasse

54. The unresolved governance impasse impaired the Company's ability to make timely and critical financial and strategic decisions when the Company was confronting significant liquidity and capital structure pressures. With the maturity date approaching and the impasse unresolved, on May 4, 2026, Trajector Holdings filed suit against Ms. Uribe in the Delaware Court of Chancery (the "Chancery Court") captioned *Trajector Holdings, LLC v. Uribe*, C.A. No. 2026-0569-LWW (Del. Ch.) (the "Delaware Litigation").

55. Through the Delaware Litigation, the Company sought a declaration confirming the scope of the Managers' ultimate decision-making authority under the LLC Agreement—specifically, that Mr. Hill has ultimate authority to enter into any new credit facility on behalf of the Company and its subsidiaries and with respect to any other material transactions that do not

concern "technical medical consulting," including ultimate authority over the entirety of the Company's SSDI operations.

56. The Company moved for judgment on the pleadings in the Delaware Litigation, asserting that the LLC Agreement is clear and unambiguous and must be enforced as written, such that Mr. Hill has ultimate authority over any new credit facility and all other material transactions not involving technical medical consulting, including the entirety of the SSDI operations. On May 21, 2026, the Chancery Court agreed and granted the motion in a ruling from the bench.

57. On May 22, 2026, the Chancery Court entered an order (the "Chancery Court Order") granting the Company's motion for judgment on the pleadings. The order provides, in relevant part, that "[p]ursuant to Section 6.01(b) of the Limited Liability Company Agreement of Trajector, in the event that a decision of the Managers is not unanimously approved, James S. Hill, II has ultimate managerial decision-making authority to enter into any new credit facility on behalf of the Company and its subsidiaries and with respect to any other material transactions that do not concern 'technical medical consulting,' including that Hill has ultimate managerial decision-making authority over the Social Security Disability operations."

58. The Chancery Court Order thus confirmed Mr. Hill's ultimate authority, in his capacity as manager, to direct any and all business matters except those strictly involving technical medical consulting operations—including his ultimate authority over all SSDI operations—and to cause the Company and its subsidiaries to enter into financing and other material transactions.

d. <u>Class Action Litigation</u>

59. In addition to the Delaware Litigation, Trajector Medical and a related entity are defendants in two putative class actions brought on behalf of veterans who engaged Trajector Medical to provide medical evidence support services in connection with their claims for VA disability compensation. Both actions assert that Trajector Medical is not accredited by the VA and therefore unlawfully charged fees for assisting with the preparation, presentation, and prosecution of VA disability claims, in alleged violation of federal statutes and regulations governing accreditation and fees (including 38 U.S.C. §§ 5901 and 5904 and 38 C.F.R. §§ 14.629 and 14.636).

60. The first action, *Christopher Baker, Randall Coates, Kerry Isner, Damon Oliver, and Warren Treadwell v. Trajector Medical, LLC (f/k/a Vet Comp & Pen Medical Consulting, LLC*), Case No. 01-2026-CA-000952 (the "<u>Baker Action</u>"), was filed on March 27, 2026 in the Circuit Court of the Eighth Judicial Circuit in and for Alachua County, Florida, and was brought on behalf of a proposed class of Florida-resident veterans. It asserts a single count under the Florida Deceptive and Unfair Trade Practices Act predicated on alleged violations of federal law governing VA accreditation and fee restrictions, and seeks actual damages, an order voiding outstanding contractual balances, injunctive relief, and attorneys' fees and costs. The Baker Action was removed to the United States District Court for the Northern District of Florida on April 28, 2026, and assigned Case No. 1:26-cv-00952. Trajector Medical thereafter filed a motion to compel arbitration, which is fully briefed. On May 8, 2026, the court entered an order staying proceedings until 35 days after the court rules on Trajector Medical's pending motion to compel arbitration. On June 2, 2026, after being advised that a similar class action (described below) was pending in a different federal district and would likely be transferred to the United

States District Court for the Northern District of Florida based on the "first to file" rule, the court administratively removed the motion to compel arbitration from its internal tracking list and indicated it would be restored after the transfer occurred and the anticipated motion to compel arbitration in that case was fully briefed.

61. The second action, *Gilbert Quijada, Jr., Jeffrey Phillips, and Kimberly Phillips v. Trajector, Inc. and Trajector Medical, LLC (f/k/a Vet Comp and Pen Medical Consulting, LLC*), Case No. 2:26-cv-03792 (the "Quijada Action," and together with the Baker Action, the "Class Actions"), was filed on April 9, 2026 in the United States District Court for the Central District of California and was brought on behalf of proposed nationwide and California classes of veterans (and eligible dependent spouses). It asserts claims for declaratory judgment, violations of the California Consumers Legal Remedies Act, violations of the California Unfair Competition Law, violations of the California Rosenthal Fair Debt Collection Practices Act, and unjust enrichment. The Quijada Action seeks compensatory, statutory, and punitive damages, restitution and disgorgement, injunctive relief, and attorneys' fees and costs. This action was transferred to the United States District Court for the Northern District of Florida on June 23, 2026, and reassigned Case No. 1:26-cv-00150-MW-MJF. Both of the Class Actions are now assigned to the same U.S. District Judge. On June 30, 2026, the Court in the Quijada Action entered a stay of all proceedings, similar to that in the Baker Action. Subsequently, on July 16, 2026, Trajector filed its motion to compel arbitration in the Quijada Action. The plaintiffs' response to the motion is due on August 6, 2026.

62. The Company strongly disputes the claims asserted in the Class Actions and has moved to compel arbitration of both actions. Should the Class Actions proceed to the merits, Trajector Medical anticipates arguing that federal law does not require it to obtain a license

because its business is the creation of high-quality, supporting medical evidence and not preparation, presentation, or prosecution of VA claims; that it accurately discloses to its veteran clients what it does and does not do; and that plaintiffs have not suffered any damages when they pay the disclosed fee only after successfully using the company's medical evidence to obtain disability benefits or a rate increase from the VA.

e. Legal and Regulatory Headwinds Affecting Trajector Medical

63. In addition to the litigation matters described above, Trajector Medical has faced considerable regulatory and legislative headwinds affecting its VA medical-evidence-development business. In recent years, a growing number of states have passed new legislation or amended existing laws regarding veterans' benefits matters. Currently, 28 states have active statutes addressing veterans' benefits matters, which generally fall into three categories:

a. **GUARD Acts (12 States)**: These laws prohibit unaccredited companies from receiving compensation in connection with a veterans' benefits matter. This framework is active in California, Illinois, Iowa, Maine, Massachusetts, Michigan, New Jersey, New York, Oregon, Rhode Island, Utah, and Washington.

b. **SAVE Acts (12 States)**: These laws specifically authorize fees for unaccredited entities, provided they adhere to specific consumer protection guardrails. Common requirements include fee caps, disclosure mandates, restrictions on business or employment relationships with medical professionals, and prohibitions on the use of international call or data centers to process veterans' personal information. This framework is active in Alabama, Colorado, Florida, Idaho, Louisiana, Mississippi, North Carolina, Oklahoma, South Carolina, South Dakota, Tennessee, and Virginia.

c. **Disclosure Laws (4 States)**: Alaska, Connecticut, Maryland, and Minnesota have enacted narrower laws focused primarily on consumer disclosures.

64. These regulatory developments have forced Trajector Medical to navigate an increasingly fragmented and inconsistent patchwork of state laws that permit certain activities in some jurisdictions while prohibiting them in others.

65. While Trajector Medical and its affiliates maintain that their services provide vital support to veterans by helping them develop and organize medical evidence, state-level regulatory changes have constrained the company's ability to operate nationwide under its historical business model. Since 2024, Trajector Medical suspended its services for veterans residing in 23 states where local laws prevent, severely limit, or impose undue risks on continued operations. For the year to date period ending June 30, 2026, the Debtors estimate that Trajector Medical's revenue declined by approximately 60% compared to the same period in the prior year, primarily as a result of these legal and regulatory changes. During the same period, the Debtors' total, combined gross revenue declined by approximately 46%. To date, legislative efforts to regulate veterans' benefits matters have occurred in 48 states. Of the 22 states without existing statutes impacting veterans' benefits matters, the overwhelming majority have considered similar proposals and are expected to consider such proposals during their 2027 legislative sessions.

66. Similar legislative efforts are also underway at the federal level. Mirroring state-level GUARD Acts, the federal SAFEGUARD Act seeks to reinstate criminal penalties for unaccredited entities that solicit, contract for, charge, or receive fees related to the preparation, presentation, or prosecution of VA benefit claims. It also aims to prohibit the use of autodialer technology when contacting federal agencies, which directly targets communications technology commonly used by unaccredited entities, and increase public-facing warnings regarding unaccredited entities. Although not expected to pass as standalone legislation in the current Congress, this proposed law could pass in a future Congress.

67. The federal CHOICE Act is a competing bill that is more aligned with state-level SAVE Acts. This proposal seeks to establish a two-tiered accreditation system that would largely

maintain the existing structure for Veterans Service Organizations (VSOs) and accredited attorneys/agents, while creating a formal pathway for private, for-profit entities to operate under VA oversight. The CHOICE Act cleared the House Committee on Veterans' Affairs in May 2025, but currently lacks a Senate companion bill. Both SAFEGUARD and CHOICE are expected to be reintroduced next year, with their respective likelihoods of success heavily dependent on the balance of power in the 120th Congress.

f. Liquidity and Capital Structure Pressures

68. The Debtors' liquidity and capital structure pressures were centered on the approaching maturity of the Deutsche Bank Credit Facility and the Debtors' efforts to refinance that facility outside of chapter 11. The Debtors negotiated a series of amendments to preserve runway and continue operations, including the Sixth Amendment, which extended the maturity date to May 29, 2026, and the Seventh Amendment, dated June 3, 2026, which further extended the stated maturity date to July 28, 2026. The Seventh Amendment imposed additional obligations designed to sustain an accelerated refinancing process, including delivery of monthly financial statements, rolling 13-week cash flow forecasts, and weekly lender calls addressing refinancing efforts and material litigation developments.

69. In response to these requirements and the Debtors' challenged liquidity position, the Debtors and their advisors communicated with several potential financing sources and other potential transaction parties in an effort to refinance the Deutsche Bank Credit Facility. Those efforts were undertaken against the backdrop of the operational, regulatory, litigation, and governance pressures described above, each of which increased the urgency of the refinancing process and reduced the Debtors' flexibility. As of the date of this Declaration, however, the Debtors have not reached agreement on a refinancing of the Deutsche Bank Credit Facility.

Given the absence of an executable refinancing transaction, the near-term maturity of the secured debt and the need to preserve enterprise value while continuing to serve clients and maintain stakeholder confidence, the Debtors determined, in the exercise of their business judgment and after consultation with their advisors, that commencing these Chapter 11 Cases was necessary and appropriate to stabilize operations, preserve liquidity, and pursue a value-maximizing restructuring for the benefit of creditors, employees, clients, and other stakeholders.

g. The Company's Prepetition Efforts to Refinance the Deutsche Bank Credit Facility and Improve Operations

70. Beginning in 2025 and leading to the Petition Date, the Company pursued and continues to pursue several parallel initiatives aimed to: (i) refinance its obligations under the Deutsche Bank Credit Facility, (ii) implement operational efficiencies and reduce costs while continuing to serve its clients, and (iii) modernize its Trajector Medical business in light of the changing legal and regulatory environment.

71. ***Efforts to Refinance the Deutsche Bank Credit Facility.*** As described above, the Company made substantial efforts to refinance the Deutsche Bank Credit Facility. The Credit Agreement was amended on multiple occasions, including the Seventh Amendment described above, which extended the maturity date to its current date of July 28, 2026. The Company, directly and through its advisors, continued to work with Deutsche Bank in an effort to preserve the relationship, but the Company and Deutsche Bank were unable to reach agreement. In mid-July 2026, the Lenders under the Deutsche Bank Credit Facility advised the Company that there would be no further extension of the maturity date.

72. Starting in 2025, the Company held discussions with several potential lenders regarding a refinancing of the Deutsche Bank Credit Facility and the Company's future capital needs. In early 2026, the Company made substantial progress with one prospective lender on the

terms of a refinancing, including executing a letter of intent in March 2026. However, the Company was not able to resolve all issues to proceed with the prospective lender in advance of the maturity date of the Deutsche Bank Credit Facility.

73. In addition, the Company explored, but ultimately did not pursue, a statutory division that would have separated the Trajector Disability business, assets, and liabilities from those of Trajector Medical. The purpose of this would be to present a corporate structure that would allow a prospective lender to lend against the Trajector Disability business as the primary collateral for a proposed financing. However, the Lenders under the Deutsche Bank Credit Facility were not supportive of this strategy.

74. Given the uncertain status of a refinancing transaction with the prospective lender, together with the mounting pressure under the Deutsche Bank Credit Facility, the Company engaged an investment banker, Tunstall Consulting, to seek out alternative lenders. During June and July 2026, Tunstall contacted more than 50 potential alternative lenders on the Company's behalf, and the Company engaged in discussions with several of them. As of the Petition Date, those efforts did not yield a refinancing transaction for the maturing Deutsche Bank Credit Facility.

75. ***Operational and Cost-Savings Measures.*** Apart from its efforts to replace the Deutsche Bank Credit Facility, the Company has recently implemented a series of operational changes to conserve cash and streamline operations. These changes included the following:

a. In early 2026, the Company suspended profit distributions to its members.

b. In early 2026, the Company reduced its headcount to ensure its personnel levels remained appropriately calibrated to its recently scaled-back operations.

c. In February 2026, Trajector Medical settled a putative class action premised on alleged false advertising, which had been filed against it and other entities and individuals in December 2023 by a proposed class of VA-accredited attorneys and agents. *Warriors and Family Assistance Ctr., Inc. et al. v. Trajector Medical, LLC*, Case No. 1:23-cv-290 (N.D. Fla.) (the "Warriors Litigation").

d. In June 2026, Trajector Medical significantly curtailed its advertising expenditures, coinciding with the Company's execution of the Seventh Amendment to the Credit Agreement.

76. ***Changes to Trajector Medical's Business Practices.*** Additionally, to reduce the potential for future litigation and regulatory scrutiny, and to focus on profitable, lower-risk business lines, the Company has, over the past year, made a series of changes to its business practices, with a particular focus on Trajector Medical. These changes included the following:

a. Trajector Medical voluntarily changed its advertising practices to reduce the potential for future false-advertising claims, including by discontinuing the statements at issue in the Warriors Litigation.

b. As set forth above, Trajector Medical voluntarily suspended the provision of services to veteran clients in certain states between 2024 through the present, in response to newly enacted state legislation and regulations affecting its business model.

c. Trajector Medical has implemented, and continues to evaluate, programs designed to increase revenue from existing and new veteran clients in the states in which it continues to operate, including through an increased emphasis on referral programs, and has explored potential modifications to its business model to address prospective federal or state legislation affecting the medical-evidence model.

77. With the cost-savings measures, operational improvements, and changes in business practices described above, together with the commencement of these Chapter 11 Cases, the Debtors are well positioned to both continue their mission of helping veterans and individuals with disabilities and proceed to implement a value-maximizing restructuring for the benefit of the Debtors' estates and stakeholders in accordance with the Bankruptcy Code.

PART II
DEBTORS' OBJECTIVES IN THESE CHAPTER 11 CASES

78. The Debtors' primary objectives in these Chapter 11 Cases are to ensure the continuity of services to their clients, stabilize their operations, preserve and maximize the value of their estates, and implement a value-maximizing restructuring. The Debtors also seek to continue to provide employment to their employees, to maintain their relationships with the contract counterparties and vendors essential to their operations, and to maximize the value of their enterprise for the benefit of their creditors.

79. To accomplish these objectives, the Debtors seek approval of various First Day Filings, including approval of the use of cash collateral, relief to continue ordinary-course payments to employees and critical vendors, and authority to maintain the Debtors' cash management system. The Debtors will continue to work constructively with their lenders and other stakeholders to maximize value.

80. The Court's approval of the relief requested in the First Day Filings will permit the Debtors to preserve and maximize their enterprise value for the benefit of their employees, clients, creditors, vendors, and other parties in interest. The Debtors' immediate objective is to stabilize their operations, preserve liquidity, and minimize any adverse effects that these Chapter 11 Cases might otherwise have on their estates by obtaining the relief requested in the First Day Filings.

81. For these reasons, and the additional reasons discussed in the First Day Filings which are incorporated herein by reference, I respectfully submit that the various forms of relief requested in the First Day Filings are in the best interest of the Debtors and their estates and should be approved by this Court.

PART III
FIRST-DAY FILINGS

82. Concurrently with the filing of these Chapter 11 Cases, the Debtors are filing certain First Day Filings. The Debtors respectfully request that the Court conduct a hearing as soon as practicable after the commencement of the Chapter 11 Cases (the "First Day Hearing") to consider the First Day Filings.

83. Several of the First Day Filings request authority to pay certain prepetition claims against the Debtors. I understand that Rule 6003 of the Federal Rules of Bankruptcy Procedure provides, in relevant part, that the Court shall not consider motions to pay prepetition claims during the first twenty-one (21) days following the filing of a chapter 11 case, except to the extent relief is necessary to avoid immediate and irreparable harm. In light of this requirement, the Debtors have narrowly tailored their requests for immediate authority to pay certain prepetition claims to those instances where the failure to pay would cause immediate and irreparable harm to the Debtors and their estates.

84. I have reviewed each of the First Day Filings (including the exhibits and schedules attached thereto) and, to the best of my knowledge, I believe that the facts set forth therein are true and correct. Moreover, I believe that the relief sought in each of the First Day Filings: (a) is essential to enable the Debtors to enter into, and to operate in, Chapter 11 with minimal disruption to operations or loss of productivity or value; (b) constitutes a critical element to the Debtors' efforts to preserve value and maximize creditor and stakeholder recoveries; and (c) best serves the Debtors' estates and creditors' and stakeholders' interests. The facts set forth in each First Day Filing are incorporated herein by reference.

A. *Debtors' Ex Parte Motion for Authorization to File Consolidated Chapter 11 Case Management Summary* (the "Case Management Motion")[5]

85. I am advised that in accordance with Local Rule 2081-1(b), the debtor in possession in a Chapter 11 case is directed to file with the Court and serve a completed local form Chapter 11 Case Management Summary providing certain information regarding the assets, liabilities, and financial affairs of Chapter 11 debtors.

86. Pursuant to the Case Management Motion filed contemporaneously herewith, the Debtors request that the Court authorize them to file a consolidated Case Management Summary, reflecting the assets, liabilities, and financial information of each of the Debtors. I believe that the Debtors' request for authority to file a consolidated Case Management Summary is justified, as the filing of a separate Case Management Summary for each of the twenty-two Debtors would be, in significant part, burdensome. In brief, the filing of a consolidated Case Management Summary is more efficient and will provide the Court and parties in interest with adequate disclosures regarding the assets and liabilities of each Debtor.

87. For the reasons set forth in the Case Management Motion and herein, I believe that the relief requested in the Case Management Motion is in the best interest of the Debtors, their estates, and all parties in interest and should be approved.

B. *Debtors' Ex Parte Motion for Joint Administration* (the "Joint Administration Motion")[6]

88. Pursuant to the Joint Administration Motion, the Debtors request entry of an order directing joint administration of the Chapter 11 Cases for procedural purposes only.

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[5] Defined terms used but not defined in this section shall have the meaning ascribed to them in the Consolidated Case Management Summary Motion.

[6] Defined terms used but not defined in this section shall have the meaning ascribed to them in the Joint Administration Motion.

89. It will be more efficient for the administration of these cases if joint administration is authorized. Joint administration of the Debtors' Chapter 11 Cases will save the Debtors and their estates substantial time and expense by removing the need to prepare, replicate, file, and serve duplicative notices, applications, and orders. Further, I believe that joint administration would relieve the Court of entering duplicative orders and maintaining duplicative files and dockets. Consequently, joint administration would reduce costs and facilitate the economical, efficient, and convenient administration of the Debtors' estates.

90. I believe that joint administration would not adversely affect any creditors' rights because the Debtors' motion requests only the administrative consolidation of these cases for procedural purposes. The Debtors filed the Joint Administration Motion on an *ex parte* basis as contemplated by Local Rule 1015-1.

91. For the reasons set forth in the Joint Administration Motion and herein, I believe that the relief requested in the Joint Administration Motion is in the best interest of the Debtors, their estates, and all parties in interest and should be approved.

C. *Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to File (A) a Consolidated Creditor Matrix and (B) a Consolidated List of the Top Thirty Unsecured Creditors; and (II) Authorizing the Debtors to Suppress Certain Personally Identifiable Information for Individual Creditors, Employees, and Parties in Interest* (the "Creditor Matrix Motion")[7]

92. Pursuant to the Creditor Matrix Motion filed contemporaneously herewith, the Debtors request authority to file and maintain a consolidated list of creditors in lieu of submitting a separate mailing matrix for each Debtor. Permitting the Debtors to maintain a consolidated list of their creditors in electronic format only, in lieu of filing a separate creditor matrix for each Debtor, is warranted under the circumstances of the Chapter 11 Cases. Because the Debtors

[7] Defined terms used but not defined in this section shall have the meaning ascribed to them in the Consolidated Creditor Matrix Motion.

have thousands of creditors and other parties in interest, converting the Debtors' computerized information to a format compatible with the matrix requirements would be a burdensome task and would greatly increase the risk of error.

93. The Debtors, working together with their claims, noticing, and solicitation agent Kurtzman Carson Consultants, LLC d/b/a Verita Global ("Verita"), have prepared a single, consolidated list of the Debtors' creditors in electronic format. The Debtors are prepared to make that list available in electronic form to any party in interest who so requests (or in non-electronic form at such requesting party's sole cost and expense) in lieu of submitting a separate mailing matrix for each Debtor to the Court's clerk's office.

94. The Debtors also request authority to file a single consolidated list of their 30 largest general unsecured creditors in lieu of filing a separate list of the top twenty unsecured creditors for each Debtor. A large number of creditors may be shared amongst the Debtors. The Consolidated Top 30 List will help alleviate administrative burdens, costs, and the possibility of duplicative service.

95. The Debtors also respectfully submit that it is appropriate to authorize the Debtors to suppress from any paper filed with the Court in these Chapter 11 Cases, the names, residential addresses, and email addresses of individuals who are creditors, employees, and parties in interest because disclosure risks violating applicable privacy laws, exposing the Debtors to potential civil liability and significant financial penalties. Pursuant to Section 107(c) of the Bankruptcy Code and privacy protection regulations being enacted in key jurisdictions, such as the California Consumer Privacy Act of 2018, it is appropriate to authorize the Debtors to suppress from any paper filed with the Court in these Chapter 11 Cases, the names, residential addresses, and email addresses of the Debtors' individual creditors, employees, and parties in

interest as such violations would expose the Debtors to potential civil liability and significant financial penalties. Verita will maintain a list of the suppressed individuals which will also be made available to the Court and United States Trustee upon request.

96. For the reasons set forth in the Creditor Matrix Motion and herein, I believe that the relief requested in the Creditor Matrix Motion is in the best interest of the Debtors, their estates, and all parties in interest and should be approved.

D. *Debtors' Emergency Motion for an Order Establishing Certain Notice Procedures* (the "Notice Procedures Motion")[8]

97. Pursuant to the Notice Procedures Motion filed concurrently herewith, the Debtors seek entry of an order approving the form and manner for implementing certain proposed notice procedures, for notifying creditors of the commencement and the administration of the Debtors' complex chapter 11 bankruptcy cases, and for granting related relief.

98. Collectively, the twenty-two Debtors have thousands of potential creditors or other parties in interest entitled to service of certain pleadings in these Chapter 11 Cases. In order to alleviate the enormous and costly burden of serving thousands of creditors and parties in interest with each filing, in some cases voluminous filings, made in these complex chapter 11 cases, the Debtors propose to create and utilize a Master Service List to serve pleadings and other documents upon parties in interest by e-mail where available, or by U.S. mail or hand delivery if required. The proposed notice procedures would supersede the applicable noticing rules contained in the Bankruptcy Rules and the Local Rules.

99. The Debtors further propose that all filings will be made available to all parties in interest on a public website maintained by the Debtors' claims, noticing, and solicitation agent, Verita. I believe that this relief requested is necessary and in the best interest of the Debtors'

[8] Defined terms used but not defined in this section shall have the meaning ascribed to them in the Notice Procedures Motion.

complex chapter 11 bankruptcy cases, and will allow for more efficient and cost saving case administration, which is in the best interest of the Debtors' estates and all the parties in interest.

100. For the reasons set forth in the Notice Procedures Motion and herein, I believe that the relief requested in the Notice Procedures Motion is in the best interest of the Debtors, their estates, and all parties in interest and should be approved.

E. *Debtors' Emergency Motion for Approval of Form of Notice of Commencement and Proof of Claim* (the "Notice of Commencement Motion")[9]

101. Pursuant to the Notice of Commencement Motion filed concurrently herewith, the Debtors request the entry of an order setting the bar dates for the filing of Proofs of Claims and approving the form and manner of notice of the commencement of these Chapter 11 cases and the bar dates for filing Proofs of Claim.

102. In order to facilitate the filing of proofs of claims, procedures need to be established for a consistent and uniform process so that everyone who may potentially wish to file one has received notice and an equal opportunity to do so. I believe that this relief requested is necessary and in the best interest of the Debtors' complex chapter 11 bankruptcy cases and will allow for more efficient and cost saving case administration, which is in the best interest of the Debtors' estates and all the parties in interest.

103. For the reasons set forth in the Notice of Commencement Motion and herein, I believe that the relief requested in the Notice of Commencement Motion is in the best interest of the Debtors, their estates, and all parties in interest and should be approved.

F. *Debtors' Emergency Application, Pursuant to Sections 105(a) and 363(b) of the Bankruptcy Code, for Authorization to Employ and Retain Mark C. Healy as Chief Restructuring Officer and Other Personnel at Michael Moecker & Associates, Inc. to*

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[9] Defined terms used but not defined in this section shall have the meaning ascribed to them in the Notice of Commencement Motion.

Provide Advisory Services, Effective as of the Petition Date **(the "MMA Retention Application")**[10]

104. Pursuant to the CRO Retention Application filed contemporaneously herewith, the Debtors seek approval of an agreement with MMA to provide the Debtors with CRO and advisory services pursuant to the Engagement Letter by and between the Debtors and MMA attached thereto. Additional factual support is set forth in the MMA Retention Application and the declarations attached thereto.

105. For the reasons set forth in the MMA Retention Application and herein, I believe that the relief requested in the MMA Retention Application is in the best interest of the Debtors, their estates, and all parties in interest and should be approved.

G. *Debtors' Emergency Application for Entry of Order Authorizing Debtors to Employ and Retain Kurtzman Carson Consultants, LLC dba Verita Global as Notice, Claims, and Solicitation Agent Effective as of the Petition Date* (the "Verita Retention Application")[11]

106. Pursuant to the Verita Retention Application filed contemporaneously herewith, the Debtors seek an order authorizing the Debtors to employ and retain Verita as claims and noticing agent in the Chapter 11 Cases. I believe that such relief is prudent in light of the fact that there are thousands of known creditors, potential unknown creditors, and parties in interest to whom certain notices will be sent. Accordingly, I believe that the most effective and efficient manner by which to give notice and process claims in the Chapter 11 Cases is to engage Verita, an independent third party with significant experience in this role, to act as an agent of the Court.

107. Additional factual support is set forth in the Verita Retention Application and the declarations attached thereto.

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[10] Defined terms used but not defined in this section shall have the meaning ascribed to them in the MMA Retention Application.

[11] Defined terms used but not defined in this section shall have the meaning ascribed to them in the Verita Retention Application.

108. The Debtors and their advisors obtained and reviewed engagement proposals from other claims and noticing agents to ensure a competitive process. Verita is one of the country's leading chapter 11 administrators, with significant experience in noticing, claims administration, solicitation, balloting, and facilitating other administrative aspects of the Chapter 11 Cases. Verita has substantial experience providing the services the Debtors require in these Chapter 11 Cases, including claims and noticing services, in matters comparable in size and complexity to this matter.

109. For the reasons set forth in the Verita Retention Application and herein, I believe that the relief requested in the Verita Retention Application is in the best interest of the Debtors, their estates, and all parties in interest and should be approved.

H. *Debtors' Emergency Motion for Interim and Final Orders Authorizing Debtors to (I) Pay Prepetition Wages, Salaries, Employee Benefits, and Other Employee Obligations, (II) Maintain Employee Benefit Programs, and (III) for Related Relief* (the "Wages Motion")[12]

110. Pursuant to the Wages Motion filed contemporaneously herewith, the Debtors request, among other things, authority, but not direction, to (a) pay prepetition wages, salaries, reimbursable expenses, and other obligations on account of the Compensation and Benefits Programs in the ordinary course of business as provided herein and (b) continue the Compensation and Benefits Programs.

111. As described more fully in the Wages Motion, the Debtors employ approximately 458 Employees and 17 Independent Contractors as of the Petition Date. The Debtors' workforce includes employees and independent contractors. Without the workforce's continued, uninterrupted services, the Debtors cannot continue to operate in the chapter 11 cases. In the

[12] Defined terms used but not defined in this section shall have the meaning ascribed to them in the Wages Motion.

ordinary course of their operations, the Debtors incur a number of obligations to, or on account of, their employees, including those related to compensation and benefits.

112. The relief requested in the Wages Motion is essential to the viability of the Debtors' businesses. Any delay in paying the employees' compensation, deductions, or benefits will fundamentally harm the Debtors' relationships with their employees and irreparably impair employee morale at the very time when dedication, confidence, and cooperation are most critical. Absent immediate authority to tender the payments described in the Wages Motion, the Debtors' operations will be severely impaired. At this critical stage of the Chapter 11 Cases, the Debtors cannot risk the substantial business disruptions that would inevitably attend any decline in work-force morale attributable to the Debtors' failure to pay employee compensation, deductions, and benefits in the ordinary course.

113. The requested relief will enable the Debtors to maintain their current operations without interruption, thereby preserving the value of the businesses, and, at the same time, maintaining Employee morale. Without the relief requested, the Debtors' ability to preserve the assets of the estates for the benefit of all creditors and stakeholders will be dramatically impaired. Therefore, a grant of the requested relief is in the best interest of the Debtors, their estates, and creditors.

114. The Debtors are not seeking relief to pay prepetition employee obligations to any individual employee or independent contractor in excess of the cap imposed by section 507(a)(4) of the Bankruptcy Code. Furthermore, the Debtors have sufficient funds to pay the employee obligations in the ordinary course using cash maintained by the Debtors and cash generated through operations.

115. For the reasons set forth in the Wages Motion and herein, I believe that the relief requested in the Wages Motion is in the best interest of the Debtors, their estates, and all parties in interest and should be approved.

I. *Debtors' Motion for Allowance of Affiliate Officers' Salaries and Benefits, Effective as of the Petition Date* (the "Affiliate Officer Motion")[13]

116. Pursuant to the Affiliate Officer Motion, the Debtors seek authority to continue paying their Affiliate Officers, Mr. Hill and Ms. Uribe, compensation and benefits consistent with their prepetition compensation and commensurate with compensation paid to officers of companies of comparable size and industry.

117. The Affiliate Officers' compensation and benefits include a base salary, 401(k) retirement savings, health, dental, and vision insurance, life and disability insurance, as well as reimbursement for reasonable and customary expenses incurred in the scope of their employment.

118. As described in the Affiliate Officer Motion, Mr. Hill serves as Co-Manager and Chief Executive Officer of the Debtors. In his capacity as Co-Manager and CEO, Mr. Hill is responsible for the overall strategic direction, day-to-day operations, and management of the Debtors' enterprise. Ms. Uribe serves as Co-Manager and Chief Medical Officer of the Debtors.

119. Mr. Hill's continued leadership and management is indispensable to the Debtors' reorganization. His departure or reduction in compensation would pose a material risk to the Debtors' ability to maintain operations, preserve going-concern value, retain key employees, and develop and confirm a plan of reorganization. No other individual possesses the combination of institutional knowledge, industry relationships, technical expertise, and leadership capability with respect to the Debtors' businesses.

[13] Defined terms used but not defined in this section shall have the meaning ascribed to them in the Affiliate Officer Motion.

120. In addition to performing the duties above, Mr. Hill will be required to expend a significant amount of time: (a) attending to bankruptcy matters; (b) communicating with significant creditors regarding the Chapter 11 Cases, (c) negotiating adequate protection with secured creditors; (d) assisting with the valuation of assets; (e) negotiating plan treatment with creditors; and (f) assisting with formulating a plan of reorganization. These additional duties did not exist prior to the Petition Date. In order to ensure the viability of the Debtors during the pendency of these Chapter 11 Cases, and satisfy the obligations to the Court, the Office of the United States Trustee, creditors, employees, and customers, Mr. Hill will have to work well in excess of forty (40) hours per week.

121. Further, the Debtors are currently able to meet their operating expenses and compensate the Affiliate Officers as set forth in the Affiliate Officer Motion. No payments will be made to Affiliate Officers if the Debtors are unable to meet their current operating expenses, and no party will be prejudiced by the granting of this Motion.

122. For the reasons set forth in the Affiliate Officer Motion and herein, I believe that the relief requested in the Affiliate Officer Motion is in the best interest of the Debtors, their estates, and all parties in interest and should be approved.

J. *Debtors' Emergency Motion for Order Authorizing Debtors to Pay Prepetition Sales, Income, and Other Taxes and Similar Obligations* (the "Taxes Motion")[14]

123. Pursuant to the Taxes Motion filed contemporaneously herewith, the Debtors request authority, among other things, to pay, in the Debtors' sole discretion, sales, income, and other taxes and similar obligations, in the ordinary course of the Debtors' businesses, without regard to whether such obligations accrued or arose before or after the Petition Date.

[14] Defined terms used but not defined in this section shall have the meaning ascribed to them in the Taxes Motion.

124. In the ordinary course of operating their businesses, the Debtors (a) incur certain sales, income, and other taxes, and (b) are charged amounts for fees and other similar charges and assessments by various licensing authorities. I understand that the Debtors are generally current with respect to their tax obligations, but estimate that they have incurred approximately $492,700 in unpaid taxes and fees to the Taxing Authorities as of the Petition Date.

125. The Debtors must continue to pay certain taxes and fees to continue operating in certain jurisdictions and to avoid potential penalties and distractions during the Chapter 11 Cases. The Debtors' failure to pay the taxes and fees described in the Taxes Motion could adversely affect the Debtors' business operations because governmental authorities may assert liens on the Debtors' property, assert penalties or interest on past-due taxes, or commence personal liability actions against directors, managers, officers, and other employees in connection with non-payment.

126. For the reasons set forth in the Taxes Motion and herein, I believe that the relief requested in the Taxes Motion is in the best interest of the Debtors, their estates, and all parties in interest and should be approved.

K. *Debtors' Emergency Motion for Authorization to (I) Continue to Administer Insurance Policies, Surety Bonds, and Related Agreements; (II) Honor Certain Obligations in Respect Thereof; and (III) for Related Relief* (the "Insurance Motion")[15]

127. Pursuant to the Insurance Motion filed contemporaneously herewith, the Debtors request authority, among other things, to maintain, renew, modify, supplement, or purchase, in their sole discretion the insurance policies described in the Insurance Motion and their surety bond program and agreements relating thereto. The Debtors also request authority to continue using the services of Gallagher, the Debtors' insurance broker.

[15] Defined terms used but not defined in this section shall have the meaning ascribed to them in the Insurance Motion.

128. The Debtors' insurance policies are crucial to the preservation of the value of the Debtors' businesses, properties, and assets. In many cases, the insurance coverage provided by the insurance policies is required by diverse regulations, laws, and contracts, as well as the Office of the United States Trustee. Therefore, I believe that it is essential for the Debtors to maintain the insurance policies for the Debtors. Moreover, if the insurance policies are allowed to lapse, the Debtors risk exposure to substantial liability for any damages resulting to persons or property of the Debtors and others, and the Debtors would have to bear the costs and expenses of defense litigation. The Debtors' continued operations, combined with the Debtors' efforts to undertake an orderly reorganization process, require that the insurance policies be maintained on an ongoing and uninterrupted basis.

129. For purposes of continuity, it would be beneficial for the Debtors to be able to continue using Gallagher's services as their insurance broker given Gallagher's familiarity with the insurance policies and the terms and conditions thereof.

130. For the reasons set forth in the Insurance Motion and herein, I believe that the relief requested in the Insurance Motion is in the best interest of the Debtors, their estates, and all parties in interest and should be approved.

L. *Debtors' Emergency Motion for an Order Authorizing (I) Debtors to Pay Prepetition Claims of Critical Vendors and (II) Financial Institutions to Honor and Process Related Checks and Transfers* (the "Critical Vendor Motion")[16]

131. Pursuant to the Critical Vendor Motion filed concurrently herewith, the Debtors seek (i) authority to pay some or all of the prepetition claims of certain vendors, suppliers, service providers, and other similar entities that are essential to maintaining the going-concern value of the Debtors' businesses (the "Critical Vendors" and whose prepetition claims are

[16] Defined terms used but not defined in this section shall have the meaning ascribed to them in the Critical Vendor Motion.

defined as the "Critical Vendor Claims") and (ii) approval of the procedures and conditions set forth in the Critical Vendors Motion. The Debtors also seek entry of an order authorizing and directing the banks and other financial institutions at which the Debtors maintain disbursement accounts, at the Debtors' direction, to receive, process, honor, and pay, to the extent of funds on deposit, any and all checks drawn or electronic fund transfers requested or to be requested by the Debtors relating to the Critical Vendor Claims. Further, the Debtors seek authority to issue new post-petition checks, or effect new electronic fund transfers, on account of the Critical Vendor Claims to replace any prepetition checks or electronic fund transfer requests that may be lost, dishonored, or rejected as a result of the commencement of these Chapter 11 Cases.

132. The Debtors operate businesses that depend on integrated communications, data infrastructure, technology-enabled administrative processes, client acquisition and marketing services, and client service support to serve their clients, manage case activity, and generate revenue in the ordinary course. In connection with the Debtors' operations, the Debtors rely upon a limited group of vendors that provide mission-critical communications platforms, cloud and data infrastructure, software development and technology tools, marketing and client-communication platforms, and client-service and case-support capacity.

133. In the normal course of their businesses, the Debtors purchase goods and services from certain vendors that are sole or limited source suppliers, difficult or impracticable to replace without substantial cost or delay, or otherwise necessary to avoid significant interruption to the Debtors' operations and revenue-generating activities.

134. Unlike vendors that may be easily and timely replaceable, the Critical Vendors are, by definition, irreplaceable absent extraordinary expense or extensive delay, and material disruption to the operations of the Debtors' businesses. The Critical Vendors are so important to

the Debtors' businesses that interrupted access to each of their particular services, even for a short duration, will likely cause irreparable harm to the Debtors' businesses. The Debtors submit that this irreparable harm will far outweigh the cost of the Critical Vendor Claims.

135. Pursuant to the Critical Vendors Motion, the Debtors are seeking authority to pay undisputed prepetition amounts to Critical Vendors in the ordinary course of the Debtors' businesses and on terms consistent with the Debtors' prepetition practices that the Debtors determine, in their business judgment, are in the best interests of the Debtors' businesses. I understand that the aggregate amount of prepetition obligations owed to Critical Vendors is approximately $298,303.56. Finally, to ensure that the Debtors' liquidity is preserved as it transitions into chapter 11, payments to Critical Vendors will be contingent on the Critical Vendors agreeing to continue to sell their goods or provide their services on terms at least as favorable as those in effect before the Petition Date.

136. For the reasons set forth in the Critical Vendor Motion and herein, I believe that the relief requested in the Critical Vendor Motion is in the best interest of the Debtors, their estates, and all parties in interest and should be approved.

M. *Debtors' Emergency Motion for Interim and Final Orders (A) Authorizing the Debtors to (I) Continue to Use Existing Cash Management System, (II) Maintain Bank Accounts and Continue Use of Existing Business Forms and Checks, (III) Honor Certain Related Prepetition and Post-petition Obligations, and (IV) Perform Intercompany Transactions; (B) Granting a Waiver of Certain Investment and Deposit Guidelines; and (C) Granting Related Relief* (the "Cash Management Motion")[17]

137. Pursuant to the Cash Management Motion filed contemporaneously herewith, the Debtors request (a) authority to (i) continue to maintain the Debtors' existing cash management system, including, without limitation, (ii) continue to maintain the Debtors' existing bank accounts and business forms and checks, (iii) honor certain prepetition and post-petition

[17] Defined terms used but not defined in this section shall have the meaning ascribed to them in the Cash Management Motion.

obligations related thereto, and (iv) continue to perform intercompany transactions in the ordinary course; and (b) waiving investment and deposit guidelines of section 345 of the Bankruptcy Code and the *Operating Guidelines and Reporting Requirements for Debtors in Possession and Chapter 11 Trustees* (revised Jan. 1, 2020) (the "Guidelines") issued by the Office of the United States Trustee; and (c) providing any additional relief required in order to effectuate the foregoing.

138. The United States Trustee has established Guidelines for debtors-in-possession in order to supervise the administration of Chapter 11 cases. These Guidelines require Chapter 11 debtors to, among other things, close all existing bank accounts and open new debtor-in-possession ("DIP") bank accounts, establish one DIP account for all estate monies required for the payment of taxes (including payroll taxes), maintain a separate DIP account for cash collateral, and obtain checks for all DIP accounts that bear the designation "debtor-in-possession," the bankruptcy case number, and the type of account. These requirements are designed to provide a clear line of demarcation between prepetition and post-petition transactions and operations and to prevent the inadvertent post-petition payment of prepetition claims. In the Cash Management Motion, the Debtors seek a waiver of these requirements so that their operations are not further disrupted by the need to alter the Cash Management System as it would create unnecessary administrative burdens and hardship and would cause unnecessary expense, utilization of resources, and delay.

139. The Cash Management System is comprised of eighteen (18) deposit accounts across five (5) financial institutions, pursuant to which the Debtors manage cash receipts and disbursements. As set forth in the Cash Management Motion, the Debtors' Cash Management System is straightforward and consists of nine (9) operating accounts, a controlled disbursement

account, a payroll account, a benefits account, a tax account, five (5) zero balance accounts, and one sweep account. An average of approximately $250,000.00 in receipts and disbursements flows through the Cash Management System each banking day.

140. The Cash Management System operates in accordance with ordinary, usual, and essential business practices. It allows the Debtors to efficiently track and report the location and amount of funds, which, in turn, enables the Debtors to track and control such funds, ensure cash availability, and reduce administrative costs through a method of coordinating the collection and movement of funds. The Debtors' existing Bank Accounts function smoothly and permit efficient collections and disbursements of cash for the benefit of the Debtors and all parties in interest. The Debtors' transition into Chapter 11 will be significantly less disruptive if its Cash Management System and existing bank accounts are maintained following the commencement of these cases with the same account numbers.

141. The Debtors' operations require the Cash Management System to continue during the pendency of the Chapter 11 Cases. If the Debtors were required to create and implement a new cash management system, their operations would be severely disrupted, which would have an adverse impact on the Debtors and would result in substantial additional costs to the Debtors' bankruptcy estates.

142. The Debtors request further relief from the UST Operating Guidelines to the extent that they require the Debtors to make all disbursements by check. Considering the complexity of the Debtors' operations, the Debtors must conduct transactions by debit, wire, or ACH payments and other similar methods, and to deny the Debtors the opportunity to conduct transactions by debit, wire, or ACH payments or other similar methods would interfere with the

Debtors' performance of their contracts and unnecessarily disrupt the Debtors' business operations, as well as create additional costs to the Debtors.

143. The Debtors also request authority to engage in certain Intercompany Transactions post-petition. If the Court grants this relief, the Debtors will continue recording all such transactions in their books and records consistent with past practice prior to the Petition Date.

144. For the reasons set forth in the Cash Management Motion and herein, I believe that the relief requested in the Cash Management Motion is in the best interest of the Debtors, their estates, and all parties in interest and should be approved.

N. *Debtors' Emergency Motion for Order (I) Authorizing the Debtors (A) to Use Cash Collateral on an Interim Basis Pursuant to 11 U.S.C. § 363, and (B) to Grant Adequate Protection in Connection Therewith Pursuant to 11 U.S.C. §§ 361, 363, and 507; and (II) Scheduling a Final Hearing Under Bankruptcy Rule 4001* (the "Cash Collateral Motion")[18]

145. As described in the Cash Collateral Motion filed contemporaneously herewith, the Debtors require the use of Cash Collateral to maintain ongoing business operations as the Debtors transition into the Chapter 11 Cases. Through the Cash Collateral Motion, the Debtors seek to utilize cash collateral in order to maintain their business, preserve the value of their estates, preserve jobs, and facilitate a successful reorganization. The Debtors' request for use of Cash Collateral is meant to cover the Debtors' essential expenses contained in the Budget which is attached to Exhibit B to the Cash Collateral Motion. Those expenses include payment of wages, purchasing supplies, paying vendors, taxes, insurance, and other expenses that are needed to operate the Debtors' businesses and remain a going concern.

[18] Defined terms used but not defined in this section shall have the meaning ascribed to them in the Cash Collateral Motion.

146. Without such cash collateral use, the Debtors project, after consultation with their advisors, that they will be unable to make payments essential to continue going-concern operations—each as highlighted in the other First Day Filings as described herein—resulting in immediate and irreparable harm to the Debtors' businesses. Such a scenario would eliminate any chance to reorganize the Debtors' businesses. Accordingly, the proposed post-petition use of Cash Collateral is critical to the Debtors' ability to administer the Chapter 11 Cases and to pursue a value-maximizing restructuring. Additional factual support is set forth in the Cash Collateral Motion and the declarations attached thereto.

147. For the reasons set forth in the Cash Collateral Motion and herein, I believe that the relief requested in the Cash Collateral Motion is in the best interest of the Debtors, their estates, and all parties in interest and should be approved.

PART IV
CONCLUSION

148. This Declaration explains the circumstances that have led to the commencement of the Chapter 11 Cases and the need for the relief requested in the First Day Filings. For the reasons described herein and in the First Day Filings which are incorporated herein by reference, I believe that the prospect for achieving the Debtors' objectives for their Chapter 11 Cases and the preservation of their businesses for the benefit of their stakeholders will be substantially enhanced if the Court grants the relief requested in each of the First Day Filings.

28 U.S.C. § 1746 Declaration

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my information, knowledge, and belief.

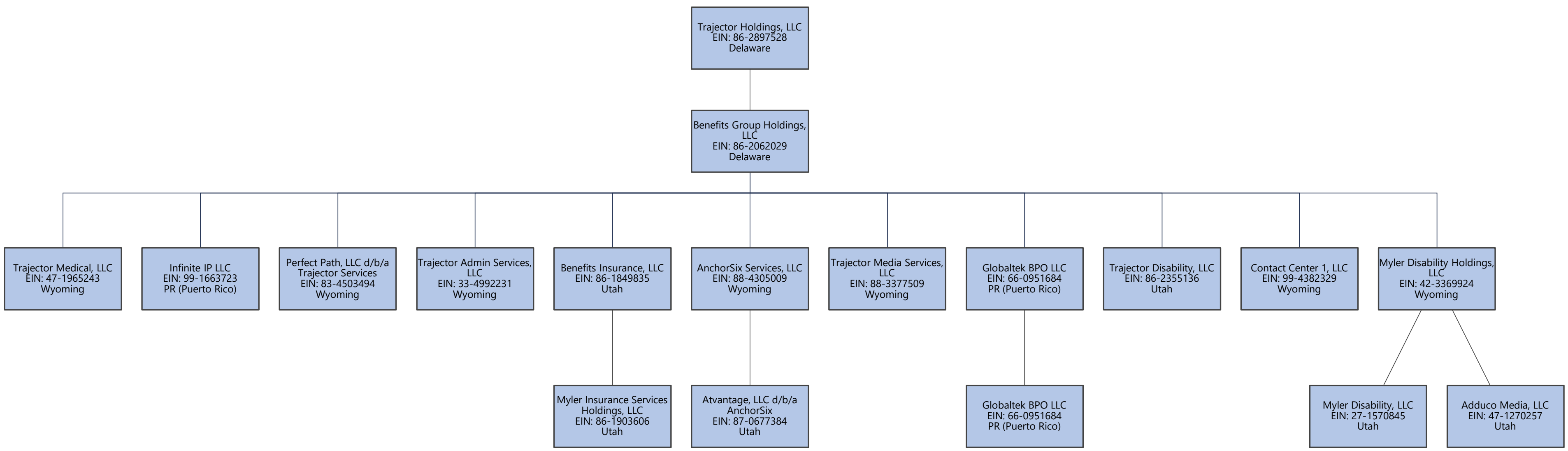
Executed this 23rd day of July 2026.

/s/ Mark C. Healy
Mark C. Healy
Chief Restructuring Officer

Exhibit A

Corporate Structure

Trajector Holdings Group Debtors



Non-Trajector Holdings Group Debtors