

EXHIBIT B
(Feil Declaration)

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-2(c) WASSERMAN, JURISTA & STOLZ, P.C. 110 Allen Road Suite 304 Basking Ridge, New Jersey 07920 Phone: (973) 467-2700 Fax: (973) 467-8126 Counsel for Florham Park Surgery Center, LLC DANIEL M. STOLZ, ESQ.
In Re: FLORHAM PARK SURGERY CENTER, LLC., Debtor-in-Possession.

Case No. 16-16964

Judge: John K. Sherwood

Chapter 11

Hearing Date:

**CERTIFICATION OF TINAMARIE FEIL IN SUPPORT OF THE APPOINTMENT
OF BMC GROUP, INC. AS NOTICING AND BALLOTING AGENT AND
ESTABLISHING NOTICE AND ADMINISTRATIVE PROCEDURES**

I, Tinamarie Feil, hereby state that the following is true and correct to the best of my knowledge, information and belief.

1. I am over the age of 18 and competent to testify. I am the President and co-founder of BMC Group, Inc. ("BMC"), a bankruptcy administrator that specializes in providing comprehensive chapter 11 administrative services including noticing, claims processing, balloting and other related services critical to the effective administration of chapter 11 cases. I am duly authorized to make and submit this declaration (the "Feil Declaration") on behalf of BMC and in support of the Debtors' application to retain BMC as Noticing and Balloting Agent ("Noticing Agent"). Unless otherwise stated in this Declaration, I have

personal knowledge of the matters set forth herein.

2. BMC is one of the country's leading chapter 11 administrators, with more than 17 years experience in noticing, claims administration, solicitation, balloting and facilitating other administrative aspects of chapter 11 cases. BMC has substantial experience providing services, including administrative services, in matters comparable in size and complexity to this matter in this District. See, e.g., In re Zucker, Goldberg & Ackerman, LLC, Case No. 15-24585 (Bankr. New Jersey, 2015) In re Binder & Binder – The National Social Security Disability Advocates (NY), LLC, Case No. 14-23728 (RDD) (Bankr. SDNY December 22, 2014); In re Quantum Foods, LLC, Case No. 14-10318 (KJC) (Bankr. D. Del. Feb. 18, 2014); In re Coach AM Group Holdings Corp., Case No. 12-10010 (KG) (Bankr. D. Del. Jan. 3, 2012); In re Graceway Pharmaceuticals, LLC, Case No. 11-13036 (PJW) (Bankr. D. Del. Sept. 29, 2011).

3. As specialists in legal administration services, BMC provides comprehensive legal notice and claims management solutions. With respect to chapter 11 case management, BMC specializes in noticing, claims processing and other administrative tasks necessary to efficiently administer chapter 11 process. BMC has provided or currently provides identical or substantially similar services as those services proposed to be provided pursuant to that certain agreement for services between the Debtors and BMC dated as of April 11, 2016 (the "Agreement") in other chapter 11 cases throughout the nation.

SERVICES TO BE RENDERED

4. The Debtors seek to employ BMC to provide, as needed, noticing and administrative services as set forth in the Agreement including, without limitation:

- a. Maintaining the creditor matrix and the core and master service lists;

- b. Preparing, coordinating and/or serving notices as desired and necessary;
 - c. Within five (5) business days after the mailing of a particular notice, file with the Clerk's office a declaration of service that includes a copy of the notice involved, an alphabetical list of persons to whom the notice was served and the date and manner of service;
 - d. Maintaining the official mailing list for the Debtor of all entities that have filed proofs of claim, which list shall be available free of charge upon request by a party- in-interest on the Service List or the Clerk, and available at the expense of any other party-in-interest upon the request of such party, and compliance with all requests for mailing labels duplicated from the mailing list (unless otherwise excused by Court order);
 - e. Promptly complying with such further conditions and requirements as the Clerk's Office or Court may at any time prescribe;
 - f. Providing such other noticing, and related administrative services as may be requested from time to time by the Debtor or the Clerk;
 - g. Providing recommendations to the Debtor regarding all aspects of the voting and ballot tabulation process, including consulting services regarding the development and review of plan solicitation materials, including the disclosure statement, ballots, master ballots, voting instructions and issues arising in connection with the vote solicitation and tabulation process;
 - h. Responding to inquiries of solicited parties regarding the disclosure statement and the plan voting procedures;
 - i. Tabulating all ballots and master ballots in accordance with established procedures;
- and
- j. Preparing an appropriate ballot certification;

STATEMENT OF CONNECTIONS

5. The Debtors have many creditors, and accordingly, BMC may have rendered and may continue to render services to certain of these creditors. Additionally, BMC employees may, in the ordinary course of their personal affairs, have relationships with certain creditors of the Debtors. For example, one or more of BMC's employees may have

obligations outstanding with financial institutions that are creditors or customers of the Debtor.

6. To the best of my knowledge, BMC neither holds nor represents an interest adverse to the Debtor's estate nor has a connection to the Debtor, their creditors or their related parties with respect to any matter for which BMC will be employed. Should BMC discover any new relevant facts or relationships bearing on the matters described herein during the period of its retention, BMC will use reasonable efforts to file promptly a supplemental declaration.

7. In connection with its appointment as Noticing Agent:

- a. BMC will not consider itself employed by the United States government and shall not seek any compensation from the United States government in its capacity as Noticing Agent in this chapter 11 case;
- b. by accepting employment in this chapter 11 case, BMC waives any rights to receive compensation from the United States government for its work in these chapter 11 cases;
- c. in its capacity as Noticing Agent in this case, BMC will not be an agent of the United States and will not act on behalf of the United States;
- d. BMC will not employ any past or present employees of the Debtor in connection with its work as Noticing Agent in this chapter 11 case; and
- e. BMC is not a creditor of the Debtor's estate.

COMPENSATION

8. The fees to be charged by BMC in connection with this chapter 11 case are set forth in the Pricing schedule annexed to the Agreement. The compensation arrangement provided for in the Agreement is consistent with and typical of arrangements entered into by BMC and such firms with respect to rendering similar services as described in the Application and the Agreement in accordance with the Bankruptcy Code, the Bankruptcy

Rules, the local rules, the chapter 11 operating guidelines established by the Office of the United States Trustee, and any and all orders of this Court.

9. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 12, 2016



Tinamarie Feil
President
BMC Group, Inc.