UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

In re:	)	Chapter 11
LABORATORY PARTNERS, INC., *et al.*,[1]	)	Case No. 13-12769 (PJW)
Reorganized Debtors.	)	**Obj. Response Deadline: Sept. 8, 2014**
	)	**Hearing Date: Sept. 25, 2014 at 9:30 a.m.**
	)	**Related Docket No. 659**

RESPONSE OF CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS TO DEBTORS' SECOND OMNIBUS OBJECTION (NON-SUBSTANTIVE) TO CERTAIN CLAIMS PURSUANT TO 11 U.S.C. § 502, FED. R. BANKR. P. 3007 AND DEL. L.R. 3007-1 (DUPLICATE; INSUFFICIENT DOCUMENTATION; AMENDED; LATE)

COMES NOW Cellco Partnership d/b/a Verizon Wireless ("Verizon Wireless"), by and through its undersigned attorneys, and submits this response to the Debtors' Second Omnibus Objection (Non-Substantive) to Certain Claims Pursuant to 11 U.S.C. § 502, Fed. R. Bankr. P. 3007 and Del. L.R. 3007-1 (Duplicate; Insufficient Documentation; Amended; Late). In support of its response, Verizon Wireless states the following:

1. On October 25, 2013 ("Petition Date"), Laboratory Partners, Inc., *et al.* ("Debtors"), filed voluntary petitions for relief with this Court under Chapter 11 of the Bankruptcy Code, 11 U.S.C. §§ 101 - 1532.

2. Prior to the Petition Date, Verizon Wireless provided cellular voice and data services to the Debtors.

3. After the Petition Date, Verizon Wireless continued providing cellular voice and data services to the Debtors.

[1] The Debtors and the last four digits of their taxpayer identification numbers are as follows: Laboratory Partners, Inc. (3376), Kilbourne Medical Laboratories, Inc. (9849), MedLab Ohio, Inc. (9072), Suburban Medical Laboratory, Inc. (0859), Biological Technology Laboratory, Inc. (4370), Terre Haute Medical Laboratory, Inc. (1809), and Pathology Associates of Terre Haute, Inc. (6485). Certain of the Debtors did business as Medlab. The Debtors' mailing address for notice in these cases is: 671 Ohio Pike, Suite K, Cincinnati, OH 45245.

4. On December 9, 2013, the Court entered the Order Pursuant to Bankruptcy Rules 2002 and 3003(c)(3), and Local Rule 2002-1(e), (I) Establishing Bar Dates for Filing Proofs of Claim and Administrative Expense Requests, and (II) Approving Form and Manner of Notice Thereof [Docket No. 180] ("Bar Date Order").

5. The Bar Date Order set a deadline of February 3, 2014 to file administrative expense claims arising between the Petition Date and the date of entry of the Bar Date Order, December 9, 2013 (the "First Administrative Period").

6. On January 31, 2014, Verizon Wireless timely filed an administrative expense request form claim against Debtor Laboratory Partners, Inc. for amounts due in the First Administrative Period in the amount of $40,753.74. This claim was designated as Claim No. 454 by the Debtors' Claims and Noticing Agent, BMC Group, Inc.

7. On August 25, 2014, Debtors filed the Debtors' Second Omnibus Objection (Non-Substantive) to Certain Claims Pursuant to 11 U.S.C. § 502, Fed. R. Bankr. P. 3007 and Del. L.R. 3007-1 (Duplicate; Insufficient Documentation; Amended; Late) ("Second Omnibus Objection") [Docket Entry No. 659].

8. Claim No. 454 filed by Verizon Wireless was included in the Second Omnibus Objection.

9. In the Second Omnibus Objection, the Debtors seek to have Claim No. 454 disallowed in full because the claim "does not include or attach sufficient information or documentation to constitute prima facie evidence as to the amount and validity of the claim" and "is not supported by the Debtors' Books and Records." Second Omnibus Objection, Exhibit B.

10. As indicated in the administrative expense request form, Claim No. 454 represents the post-petition balance due for the First Administrative Period under the Debtors'

account with Verizon Wireless for cellular voice and data services: Account No. 0480767951-00001.

11. Verizon Wireless's records indicate that the post-petition balance due under Account No. 0480767951-00001 for the First Administrative Period is $40,753.74.

12. The invoices supporting Claim No. 454 are voluminous (totaling over 4,000 pages) and therefore are not attached hereto. However, Verizon Wireless agrees to provide the Debtors with copies of the invoices to support Verizon Wireless's claim for post-petition services provided to the Debtors in the First Administrative Period as asserted in Claim No. 454.

13. Verizon Wireless expects that the invoices will demonstrate the amounts due thereunder.

14. Counsel for the Debtors should communicate with counsel for Verizon Wireless, Darrell W. Clark, to resolve the objection to Claim No. 454. Mr. Clark's contact information appears below. In addition, Verizon Wireless agrees to provide the Debtors with the contact information of a business person at Verizon Wireless to assist in resolving the objection.

WHEREFORE, Verizon Wireless respectfully requests that this Court enter an order overruling the Debtors' objection in the Second Omnibus Objection to Claim No. 454 filed by Verizon Wireless.

Dated: September 8, 2014
Wilmington, DE

MCCARTER & ENGLISH, LLP

/s/ Kate Roggio Buck

William F. Taylor, Jr. (DE Bar #2936)
Kate Roggio Buck (DE Bar #514)
Renaissance Centre
405 N. King Street, 8th Floor
Wilmington, Delaware 19801
Tel: 302-984-6300
Fax: 302-984-6399
wtaylor@mccarter.com
kbuck@mccarter.com

and

Darrell W. Clark
STINSON LEONARD STREET LLP
1775 Pennsylvania Ave., NW, Suite 800
Washington, DC 20006
Tel: 202-785-9100
Fax: 202-785-9163
darrell.clark@stinsonleonard.com

Counsel for Cellco Partnership d/b/a Verizon Wireless