

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

-----x

In re:

Chapter 11

FEDERATION EMPLOYMENT AND
GUIDANCE SERVICE, INC. d/b/a FECS¹,

Case No. 15-71074 (REG)

Debtor.

-----x

**STIPULATION AND CONSENT ORDER RESOLVING PROOF OF
CLAIM NO. 146 FILED BY SELFHELP COMMUNITY SERVICES, INC. AND
PROOF OF CLAIM NO. 572 FILED BY SINGLEPOINT CARE NETWORK, LLC**

This stipulation and consent order (the “Stipulation and Consent Order”) is made and entered into by and between Judith Pincus, as Plan Administrator (the “Plan Administrator”) of the post-confirmation chapter 11 estate of Federation Employment and Guidance Service, Inc. d/b/a FECS (the “Estate”), Selfhelp Community Services, Inc. (“Selfhelp”), and SinglePoint Care Network, LLC (“SinglePoint” and, together with Selfhelp, collectively, the “Claimants” and, together with the Plan Administrator, collectively, the “Parties”).

WHEREAS, on May 26, 2015, Selfhelp filed a proof of claim against the Estate, designated as proof of claim number 146 (“Claim No. 146”) on the official claims register in this chapter 11 case, in the aggregate amount of \$860,698.00; and

WHEREAS, on August 13, 2015, SinglePoint filed a proof of claim against the Estate, designated as proof of claim number 572 (“Claim No. 572” and, together with Claim No. 146, collectively, the “Claims”) on the official claims register in this chapter 11 case, in the aggregate amount of \$860,698.00; and

¹ The last four digits of the Debtor’s federal tax identification number are 4000.

WHEREAS, on January 8, 2020, the Plan Administrator, through counsel, filed an objection seeking to expunge the Claims (the “Objection”) [Docket No. 1182];

WHEREAS, on January 31, 2020, the Claimants, through counsel, filed an opposition to the Objection (the “Opposition”) [Docket No. 1190]; and

WHEREAS, the Parties agreed to adjourn the hearing on the Objection with respect to the Claims while negotiations were undertaken to resolve the Objection; and

WHEREAS, the Parties, by and through their respective counsel, engaged in arm’s length negotiations regarding the amount of the Claims; and

WHEREAS, the Parties desire to consensually resolve the Objection;

NOW, THEREFORE, the parties hereby stipulate and agree as follows:

1. Claim No. 146 shall be an allowed Class 4 general unsecured claim in the amount of \$200,000.00.

2. Claim No. 572 shall be disallowed and expunged.

3. This Stipulation and Consent Order is to resolve the Objection and fix the Claims. Other than as specifically set forth herein, this Stipulation and Consent Order is not intended to otherwise affect the rights or obligations of the Parties, all of which are specifically preserved. The Parties do not waive, and expressly reserve all other rights, including but not limited to, all rights and remedies available to the Parties under the Bankruptcy Code, orders of the Bankruptcy Court, and any other applicable law.

4. This Stipulation and Consent Order shall be deemed effective as to the Parties and their attorneys, agents, and representatives, upon the execution by the Parties and entry by the Bankruptcy Court.

5. This Stipulation and Consent Order may not be amended, modified, supplemented, or terminated, except by written consent of the Parties or upon further order of the Bankruptcy Court.

[Remainder of Page Intentionally Left Blank]

6. The Bankruptcy Court shall retain jurisdiction to determine any disputes that may arise between the Parties regarding this Stipulation and Consent Order.

STIPULATED, CONSENTED, AND AGREED TO BY:

GARFUNKEL WILD, P.C.

**SELFHELP COMMUNITY SERVICES,
INC. AND SINGLEPOINT CARE
NETWORK, LLC**

By: /s/ Adam T. Berkowitz
Adam T. Berkowitz, Esq.
111 Great Neck Road
Great Neck, NY 11021
Telephone: (516) 393-2200

By: /s/ Steven G. Tepper
Steven G. Tepper, Esq.
520 Eighth Avenue, 5th Floor
New York, NY 10018
Telephone: (212) 971-7600

Counsel to the Plan Administrator and the Estate

Counsel to Selfhelp and SinglePoint

NO OBJECTION:

PACHULSKI, STANG, ZIEHL, & JONES

By: /s/ Ilan D. Scharf
Ilan D. Scharf, Esq.
Counsel to the Oversight Committee
780 Third Avenue, 34th Floor
New York, NY 10017
Telephone: (212) 561-7700

SO ORDERED:

**Dated: Central Islip, New York
June 30, 2020**



A handwritten signature in black ink, appearing to read "Robert E. Grossman". The signature is written in a cursive style and is positioned above a horizontal line.

**Robert E. Grossman
United States Bankruptcy Judge**