

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

SC HEALTHCARE HOLDING, LLC *et al.*,

Debtors.¹

Chapter 11

**Case No. 24-10443 (TMH)
Jointly Administered**

Re: D.I. 97, 38

**COLUMN FINANCIAL, INC.'S WITNESS AND
EXHIBIT LIST FOR HEARING ON MAY 13 AND 14, 2024 AT 9:30 A.M. (ET)**

PLEASE TAKE NOTICE that pursuant to the Court's Chambers Procedures, Column Financial, Inc. ("**Column**"), by and through its undersigned counsel, hereby submit the following Witness and Exhibit Lists connection with the hearing scheduled for May 13 and 14, 2024 at 9:30 a.m. (ET) (the "**Hearing**") before the Honorable Thomas Horan, at the United States Bankruptcy Court for the District of Delaware, located at 824 N. Market Street, Wilmington, Delaware 19801, at which time the following motion will be heard:

- *Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Financing, (II) Granting Security Interests and Superpriority Administrative Expense Status, (III) Granting Adequate Protection to Certain Prepetition Secured Credit Parties, (IV) Modifying the Automatic Stay, (V) Authorizing the Debtors to Enter Into Agreements With JMB Capital Partners Lending, LLC, (VI) Authorizing Non-Consensual Use of Cash Collateral,*

¹ The last four digits of SC Healthcare Holding, LLC's tax identification number are 2584. The mailing address for SC Healthcare Holding, LLC is c/o Petersen Health Care Management, LLC 830 West Trailcreek Dr., Peoria, IL 61614. Due to the large number of debtors in these Chapter 11 Cases, whose cases are being jointly administered, a complete list of the Debtors and the last four digits of their federal tax identification numbers are not provided herein. A complete list of such information will be made available on a website of the Debtors' claims and noticing agent at www.kcclc.net/Peterson.



(VII) *Scheduling a Final Hearing*, and (VIII) *Granting Related Relief* [Docket No. 38] (the “**DIP Motion**”)

WITNESSES

1. Louis E. Robichaux, IV: Testimony of Mr. Robichaux related to all topics included in (i) the *Declaration of Mark Myers in Support of the DIP Motion* [Dkt. No. 258] (the “**Myers Declaration**”); (ii) any documents listed in the chart of exhibits provided below; (iii) any other topic related to the DIP Motion.

2. Column reserves the right to (i) identify additional or substitute witnesses who may testify at the Hearing, (ii) call additional witnesses for the purposes of rebuttal or impeachment, (iii) call any witness identified by another party in their witness list, regardless of whether that party thereafter removes the witness from their list, and (iv) call any witness necessary for the purpose of authenticating documents or otherwise seeking the admission of documents into evidence.

EXHIBITS

Exh. No.	Description	Docket No., Bates No., or Other Identifier
1.	Exhibit B to the Myers Declaration allocating value among various facilities and providing comparable transactions	Dkt. No. 258
2.	Petersen Healthcare Portfolio Marketing Report, May 7, 2024 (CONFIDENTIAL)	--
3.	2022 State of Illinois Department of Healthcare and Family Services Financial and Statistical Report (Cost Report) for Long-Term Care Facilities (Fiscal Year 2022): Allure of Galesburg	--
4.	2022 State of Illinois Department of Healthcare and Family Services Financial and Statistical Report (Cost Report) for Long-Term Care Facilities (Fiscal Year 2022): Allure of Moline	--
5.	2022 State of Illinois Department of Healthcare and Family Services Financial and Statistical Report (Cost Report) for Long-Term Care Facilities (Fiscal Year 2022): Allure of Sterling	--

Exh. No.	Description	Docket No., Bates No., or Other Identifier
6.	2022 State of Illinois Department of Healthcare and Family Services Financial and Statistical Report (Cost Report) for Long-Term Care Facilities (Fiscal Year 2022): Bria of Mascoutah	--
7.	2022 State of Illinois Department of Healthcare and Family Services Financial and Statistical Report (Cost Report) for Long-Term Care Facilities (Fiscal Year 2022): Champagne Urbana Nrsrg Rehab	--
8.	2022 State of Illinois Department of Healthcare and Family Services Financial and Statistical Report (Cost Report) for Long-Term Care Facilities (Fiscal Year 2022): Colonial Manor	--
9.	2022 State of Illinois Department of Healthcare and Family Services Financial and Statistical Report (Cost Report) for Long-Term Care Facilities (Fiscal Year 2022): DeKalb County Rehab Nursing	--
10.	2022 State of Illinois Department of Healthcare and Family Services Financial and Statistical Report (Cost Report) for Long-Term Care Facilities (Fiscal Year 2022): Heritage Health Beardstown	--
11.	2022 State of Illinois Department of Healthcare and Family Services Financial and Statistical Report (Cost Report) for Long-Term Care Facilities (Fiscal Year 2022): Heritage Health Litchfield	--
12.	2022 State of Illinois Department of Healthcare and Family Services Financial and Statistical Report (Cost Report) for Long-Term Care Facilities (Fiscal Year 2022): Heritage Health Mendota	--
13.	2022 State of Illinois Department of Healthcare and Family Services Financial and Statistical Report (Cost Report) for Long-Term Care Facilities (Fiscal Year 2022): Heritage Health Mt. Zion	--
14.	2022 State of Illinois Department of Healthcare and Family Services Financial and Statistical Report (Cost Report) for Long-Term Care Facilities (Fiscal Year 2022): Heritage Health Pana	--
15.	2022 State of Illinois Department of Healthcare and Family Services Financial and Statistical Report (Cost Report) for Long-Term Care Facilities (Fiscal Year 2022): Heritage Health Walnut	--
16.	2022 State of Illinois Department of Healthcare and Family Services Financial and Statistical Report (Cost Report) for Long-Term Care Facilities (Fiscal Year 2022): Three Springs Lodge Nursing Home	--
17.	Any exhibit designated by any other party	--

RESERVATION OF RIGHTS

Column reserves the right to amend this witness and exhibit list at any time prior to the Hearing, including, without limitation, in the event of the filing of any objections, responses, replies, supplemental declarations, or other filings in connection with the Motions or the production of additional documents by the Debtors in response to discovery.

[Remainder of Page Intentionally Left Blank]

Dated: May 9, 2024
Wilmington, Delaware

Respectfully submitted,

LANDIS RATH & COBB LLP

/s/ Richard S. Cobb

Richard S. Cobb, Esq. (No. 3157)
Joshua B. Brooks, Esq. (No. 6765)
919 Market Street, Suite 1800
Wilmington, Delaware 19801
Telephone: (302) 467-4400
Facsimile: (302) 467-4450
Email: cobb@lrclaw.com
brooks@lrclaw.com

-and-

HOLLAND & KNIGHT LLP

David E. Lemke, Esq. (admitted *pro hac vice*)
Tyler N. Layne, Esq. (admitted *pro hac vice*)
511 Union Street, Suite 2700
Nashville, TN 37219
Telephone: (615) 244-6380
Facsimile: (615) 244-6804
Email: david.lemke@hklaw.com
tyler.layne@hklaw.com

William R. "Trip" Nix, Esq. (admitted *pro hac vice*)
100 Congress Avenue, Suite 1800
Austin, TX 78701
Telephone: (512) 685-6400
Facsimile: (512) 685-6417
Email: trip.nix@hklaw.com

*Attorneys for the Column Financial, Inc., as
successor in interest to Sector Financial, Inc. as
administrative agent for the Column Lenders*