

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

In re:

SC HEALTHCARE HOLDING, LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 24-10443 (TMH)

(Jointly Administered)

**Ref. Docket Nos. 38, 57, 73 & 91**

**WITNESS AND EXHIBIT LIST OF LUMENT REAL ESTATE CAPITAL LLC**

Lument Real Estate Capital LLC (“Lument”) hereby files this Witness and Exhibit List for the final hearing on *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, (VII) Scheduling a Final Hearing, and (VIII) Granting Related Relief [D.I. 38]* (the “DIP Motion”) set for hearing commencing on May 13, 2024, at 10:00 A.M. (Eastern Time).

**Witnesses**

1. Any witness called or listed by any other party in interest; and
2. Rebuttal and/or impeachment witnesses, as necessary.

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<sup>1</sup> 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, for which the Debtors have requested joint administration, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information will be made available on a website of the Debtors’ proposed claims and noticing agent at [www.kccllc.net/Petersen](http://www.kccllc.net/Petersen).



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**Exhibits**

Ex. No.	Description
A.	Lument Name Change Documentation; attached as Exhibit A to <i>Objection of Lument Real Estate Capital, LLC to 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, (VII) Scheduling a Final Hearing, and (VIII) Granting Related Relief [D.I. 57] (the "Objection")</i> .
B.	Lument Notes and Note Modifications, attached as Exhibit B to the Objection.
B-1	Petersen 23 (Palm Terrace of Mattoon) Note and Note Modification.
B-2	Petersen 26 (Flora Health Center) Note and Note Modification.
B-3	Petersen 27 (Toulon Rehab & Health Center) Note and Note Modification.
B-4	Petersen 29 (Mt. Vernon Health Center) Note.
B-5	Petersen 30 (White Oak Rehab & Health Center) Note and Note Modification.
C.	Lument Mortgages and Mortgage Amendments, attached as Exhibit C to the Objection.
C-1	Petersen 23 (Palm Terrace of Mattoon) Mortgage and Mortgage Amendment.
C-2	Petersen 26 (Flora Health Center) Mortgage and Mortgage Amendment.
C-3	Petersen 27 (Toulon Rehab & Health Center) Mortgage and Mortgage Amendment.
C-4	Petersen 29 (Mt. Vernon Health Center) Mortgage.
C-5	Petersen 30 (White Oak Rehab & Health Center) Mortgage and Mortgage Amendment.
D.	Lument Security Agreements, attached as Exhibit D to the Objection.
D-1	Petersen 23 (Palm Terrace of Mattoon) Security Agreement.
D-2	Petersen 26 (Flora Health Center) Security Agreement.
D-3	Petersen 27 (Toulon Rehab & Health Center) Security Agreement;
D-4	Petersen 29 (Mt. Vernon Health Center) Security Agreement.
D-5	Petersen 30 (White Oak Rehab & Health Center) Security Agreement.
E.	Lument UCC-1 Filings, attached as Exhibit E to the Objection.

F.	Lument Master Lease and Memorandum of Leases, attached as Exhibit F to the Objection.
G.	Lument Sublease and Memorandum of Subleases, attached as Exhibit G to the Objection.
H.	Lument Master Tenant Security Agreements, attached as Exhibit H to the Objection.
I.	Lument Sublessee Security Agreements, attached as Exhibit I to the Objection.
J.	Lument Member Security Agreements, attached as Exhibit J to the Objection.
K.	Lument Owner Regulatory Agreements, attached as Exhibit K to the Objection.
L.	Lument Master Tenant Regulatory Agreements, attached as Exhibit L to the Objection.
M.	Lument Operator Regulatory Agreements, attached as Exhibit M to the Objection.
	Any Document or pleading filed with the Court in the above-captioned cases.
	Any exhibit necessary for impeachment or rebuttal purposes.
	Any exhibit identified or offered by any other party.

**Reservation of Rights**

Lument reserves the right to use and/or present demonstratives for any purpose. Lument also reserves the right to use exhibits, demonstratives, and testimony not listed here for impeachment purposes at the hearing.

Lument reserves the right to supplement or otherwise amend this Witness and Exhibit List prior to the hearing.

Dated: May 9, 2024  
Wilmington, Delaware

Respectfully submitted,

/s/ Matthew G. Summers

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**CERTIFICATE OF SERVICE**

I, Matthew G. Summers, hereby certify that, on this 9<sup>th</sup> day of May 2024, I caused a true and correct copy of the foregoing *Witness and Exhibit List of Lument Real Estate Capital LLC* to be served *via* CM/ECF on all parties who have registered for electronic service in these cases.

Dated: May 9, 2024  
Wilmington, Delaware

/s/ Matthew G. Summers  
Matthew G. Summers (No. 5533)  
BALLARD SPAHR LLP