

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

**In re**

**SC HEALTHCARE HOLDING, LLC *et al.*,**

**Debtors.<sup>1</sup>**

Chapter 11

Case No. 24-10443 (TMH)

Jointly Administered

**Ref. Docket No. 234**

**DECLARATION OF DISINTERESTEDNESS OF WILLIS TOWERS WATSON  
PURSUANT TO THE ORDER (I) AUTHORIZING THE DEBTORS  
TO RETAIN AND COMPENSATE PROFESSIONALS UTILIZED IN THE  
ORDINARY COURSE OF BUSINESS AND (II) GRANTING RELATED RELIEF**

I, Douglas Friske, declare under penalty of perjury:

1. I am a Managing Director of Willis Towers Watson, located at 233 S. Wacker Drive, Suite 1800, Chicago, IL 60606 (the “Firm”).
2. SC Healthcare Holding, LLC and certain of its affiliates, as debtors and debtors in possession (collectively, the “Debtors”), have requested that the Firm provide compensation advisory services to the Debtors, and the Firm has consented to provide such services.
3. The Firm is not a legal services firm.
4. The Firm has represented and advised the Debtors as compensation advisors with respect to the Debtors’ compensation plans, since June 7<sup>th</sup>, 2024.
5. As of the Petition Date, the Firm held a retainer in the amount of \$0.

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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 is not provided herein. A complete list of such information is available on a website of the Debtors’ claims and noticing agent at [www.kcellc.net/Petersen](http://www.kcellc.net/Petersen).



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6. The Firm's current customary hourly rates for employees working on this engagement, subject to change from time to time, are \$246–\$1,252. In the ordinary course of business, the Firm reviews and revises its regular hourly rates during the course of the year based on business conditions and advises that, the aforementioned rates may be revised. The Firm keeps, in the ordinary course of business, time records in half-hour increments.

7. The Firm may have performed services in the past, may currently perform services, and may perform services in the future in matters unrelated to the Debtors' chapter 11 cases (the "Chapter 11 Cases") for persons that are parties in interest in the Chapter 11 Cases. The Firm, however, does not perform services for any such person in connection with the Chapter 11 Cases, or have any relationship with any such person, their attorneys, or accountants that would be adverse to the Debtors or their estates.

8. As part of its customary practice, the Firm is retained in cases, proceedings, and transactions involving many different parties, some of whom may represent or be employed by the Debtors, claimants, and parties in interest in the Chapter 11 Cases.

9. Neither I nor any principal, partner, director, officer, etc. of, or professional employed by, the Firm has agreed to share or will share any portion of the compensation to be received from the Debtors with any other person other than the principal and regular employees of the Firm.

10. Neither I nor any principal, partner, director, officer, of, or professional employed by, the Firm, insofar as I have been able to ascertain, holds or represents any interest adverse to the Debtors or their estates with respect to the matter(s) upon which the Firm is to be employed.

11. In light of the foregoing, I believe that the Firm does not hold or represent any interest materially adverse to the Debtors, their estates, creditors, or equity interest holders, as identified to the Firm, with respect to the matter in which the Firm will be engaged.

12. The Debtors owe the Firm \$0 for prepetition services, the payment of which is subject to limitations contained in title 11 of the United States Code, 11 U.S.C. §§ 101-1532.

13. As of the Petition Date, which was the date on which the Debtors commenced the Chapter 11 Cases, the Firm was not party to an agreement for indemnification with certain of the Debtors.

14. The Firm is conducting further inquiries regarding its retention by any creditors of the Debtors, and upon conclusion of that inquiry, or at any time during the period of its employment, if the Firm should discover any facts bearing on the matters described herein, the Firm will supplement the information contained in this Declaration.

15. The foregoing constitutes the statement of the Firm pursuant to sections 327(a) and 504 of the Bankruptcy Code, Bankruptcy Rules 2014 and 2016, and Local Rules 2014-1 and 2016-2.

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

Date: June 27, 2024

/s/ Douglas Friske  
Douglas Friske