

**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

**NOTICE OF SUBPOENA FOR RULE 2004 EXAMINATION  
BY THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS**

**TO:** Candle Hospitality, LLC  
Charleston - PHC, Inc.  
Charleston HCC, LLC;  
Charter Bus Company, LLC  
Cumberland - PHC, Inc.  
Cumberland HCC, LLC  
Neeley, LLC  
Neeley Incorporated Cell  
Petersen Companies, LLC  
Petersen Hospitality, LLC  
Petersen Hotels, LLC  
Plaza West Development, LLC  
Twenty Four Corp, LLC

**PLEASE TAKE NOTICE THAT** pursuant to the Court's June 25, 2024 Order Granting the *Motion of the Official Committee of Unsecured Creditors for Discovery and Examination of The Petersen Non-Debtor Entities Pursuant to Bankruptcy Rule 2004* [Docket No. 560] ("Order"), Rule 2004 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and Rule 2004-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court

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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, 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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for the District of Delaware (the “Local Rules”), or any other applicable law or rule, the Official Committee of Unsecured Creditors (the “Committee”), the Official Committee of Unsecured Creditors (the “Committee”) has issued the Subpoena for Rule 2004 Examination directed to the entities identified above.

Pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, you are required to confer with the serving party and designate and produce one or more officers, directors, managing agents or other persons to testify on your behalf, concerning the matters set forth in **Exhibit A** attached hereto.

**PLEASE TAKE FURTHER NOTICE THAT** the examination shall take place on **July 29, 2024** commencing at **9:00 a.m. (CT)** at Advantage Reporting Service, 110 SW Jefferson Ave., Suite #430, Peoria, IL, 61602. The examination will take place before a Notary Republic or other person authorized by law to administer oaths and will continue day to day until completed. The examination will be recorded by stenographic and audiovisual means. Zoom participation in the examination will be available. Any parties wishing to participate in the examination by Zoom may contact counsel for the Committee (Dennis Meloro at [Dennis.Meloro@gtlaw.com](mailto:Dennis.Meloro@gtlaw.com), Danielle Kemp at [kempd@gtlaw.com](mailto:kempd@gtlaw.com) and Martin Kedziora at [kedzioram@gtlaw.com](mailto:kedzioram@gtlaw.com)).

The examination will be taken for discovery, for use at any evidentiary hearing or trial, or for any other purposes permitted by law, the Federal Rules of Civil Procedure, the Bankruptcy Rules and the Local Rules.

**PLEASE TAKE FURTHER NOTICE THAT** pursuant to the Order and the Subpoena for Rule 2004 Examination you are directed and commended to produce all documents responsive to the categories set forth in the Document Requests attached the Subpoena for Rule 2004 Examination by **July 18, 2024 at 4:00 p.m. ET**, by electronic means to counsel for the Committee

(Dennis Meloro at Dennis.Meloro@gtlaw.com, Danielle Kemp at kempd@gtlaw.com and Martin Kedziora at kedzioram@gtlaw.com).

Dated: June 28, 2024

**GREENBERG TRAURIG, LLP**

*/s/ Dennis A. Meloro*

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Dennis A. Meloro (No. 4435)  
222 Delaware Avenue, Suite 1600  
Wilmington, DE 19801  
Telephone: (302) 661-7000  
Facsimile: (302) 661-7360  
Email: MeloroD@gtlaw.com

-and-

Nancy A. Peterman (admitted *pro hac vice*)  
Danny Duerdoth (admitted *pro hac vice*)  
77 West Wacker Drive, Suite 3100  
Chicago, IL 60601  
Telephone: (312) 456-8400  
Facsimile: (312) 456-8435  
Emails: PetermanN@gtlaw.com  
DuerdothD@gtlaw.com

*Counsel for the Official Committee  
of Unsecured Creditors*

**EXHIBIT A**

## DEFINITIONS

In additional to the definitions set forth in the Federal Rules of Civil Procedure and the Federal Rules of Bankruptcy Procedure, which are incorporated herein by reference, the following definitions apply to each topic set forth herein:

1. “Affiliate” shall have the same definition as set forth under section 101(2) of the Bankruptcy Code.

2. “Debtors” shall mean: the Receivership Entities; Aledo HCO, LLC (d/b/a Aledo Rehabilitation & Health Care Center); Aledo RE, LLC (d/b/a Aledo Rehabilitation & Health Care Center); Arcola HCO, LLC (d/b/a Arcola Health Care); Arcola RE, LLC (d/b/a Arcola Health Care); Aspen HCO, LLC (d/b/a Aspen Rehab & Health Care); Aspen RE, LLC (d/b/a Aspen Rehab & Health Care); Bement HCO, LLC (d/b/a Bement Health Care Center); Bement RE, LLC (d/b/a Bement Health Care Center); Betty’s Garden HCO, LLC (d/b/a Betty’s Garden Memory Care of Kewanee); Betty’s Garden RE, LLC (d/b/a Betty’s Garden Memory Care of Kewanee); Bradford AL RE, LLC (d/b/a Courtyard Estates of Bradford); Bushnell AL RE, LLC (d/b/a Courtyard Estates of Bushnell); Casey HCO, LLC (d/b/a Casey Health Care Center); Collinsville HCO, LLC (d/b/a Collinsville Rehabilitation & Health Care Center); Collinsville RE, LLC (d/b/a Collinsville Rehabilitation & Health Care Center); CYE Bradford HCO, LLC (d/b/a Courtyard Estates of Bradford); CYE Bushnell HCO, LLC (d/b/a Courtyard Estates of Bushnell); CYE Girard HCO, LLC (d/b/a Courtyard Estates of Girard); CYE Kewanee- PHC, Inc. (d/b/a Courtyard Estates of Kewanee); CYE Knoxville - PHC, Inc (d/b/a Courtyard Estates of Knoxville); CYE Monmouth - PHC, Inc (d/b/a Courtyard Estates of Monmouth); CYE Sullivan HCO, LLC (d/b/a Courtyard Estates of Sullivan); CYE Walcott HCO, LLC (d/b/a Courtyard Estates of Walcott); CYV Kewanee AL RE, LLC (d/b/a Courtyard Village of Kewanee); Decatur HCO, LLC (d/b/a Decatur

Rehabilitation & Health Care Center); Decatur RE, LLC (d/b/a Decatur Rehabilitation & Health Care Center); Eastview HCO, LLC (d/b/a Eastview Terrace); Eastview RE, LLC (d/b/a Eastview Terrace); Effingham HCO, LLC (d/b/a Effingham Rehabilitation & Health Care Center); Effingham RE, LLC (d/b/a Effingham Rehabilitation & Health Care Center); El Paso - PHC, Inc (d/b/a El Paso Health Care Center); Flanagan - PHC, Inc. (d/b/a Flanagan Rehabilitation & Health Care Center); Havana HCO, LLC (d/b/a Havana Health Care Center); Havana RE, LLC (d/b/a Havana Health Care Center); Jonesboro, LLC (d/b/a Jonesboro Rehabilitation & Health Care Center); Kewanee HCO, LLC (d/b/a Kewanee Care Home); Kewanee, LLC (d/b/a Kewanee Care Home); Knoxville & Pennsylvania, LLC; Lebanon HCO, LLC (d/b/a Lebanon Care Center); Lebanon RE, LLC (d/b/a Lebanon Care Center); Legacy PHC, Inc. (d/b/a Legacy Estates of Monmouth); Macomb, LLC (d/b/a Countryview Care Center of Macomb); Marigold – PHC, Inc. (d/b/a Marigold Rehabilitation & Health Care Center); MBP Partner, LLC; McLeansboro HCO, LLC (d/b/a McLeansboro Rehabilitation & Health Care Center); McLeansboro RE, LLC (d/b/a McLeansboro Rehabilitation & Health Care Center); Midwest Health Operations, LLC (d/b/a Cornerstone Rehabilitation & Health Care Center; Sauk Valley Senior Living & Rehabilitation Center; Shawanee Rose Care; and CenterRock River Gardens); Midwest Health Properties, LLC (d/b/a Cornerstone Rehabilitation & Health Care Center; Sauk Valley Senior Living & Rehabilitation Center; Shawanee Rose Care; and CenterRock River Gardens); North Aurora HCO, LLC (d/b/a North Aurora Care Center); North Aurora, LLC (d/b/a North Aurora Care Center); Petersen 23, LLC (d/b/a Palm Terrace of Mattoon); Petersen 25, LLC (d/b/a Casey Health Care Center); Petersen 26, LLC (d/b/a Flora Rehabilitation & Health Care Center); Petersen 27, LLC (d/b/a Toulon Rehabilitation & Health Care Center); Petersen 29, LLC (d/b/a Mt. Vernon Health Care Center); Petersen 30, LLC (d/b/a White Oak Rehabilitation & Health Care Center); Petersen

Farmer City, LLC (d/b/a Farmer City Rehab & Health Care); Petersen Health & Wellness, LLC (d/b/a Enfield Rehabilitation & Health Care Center; Rock Falls Rehabilitation & Health Care Center; and Newman Rehabilitation & Health Care Center); Petersen Health Business, LLC (d/b/a Sandwich Rehabilitation & Health Care Center); Petersen Health Care - Farmer City, LLC (d/b/a Farmer City Rehab & Health Care); Petersen Health Care - Illini, LLC (d/b/a Illini Heritage Rehab & Health Care); Petersen Health Care - Roseville, LLC (d/b/a Roseville Rehabilitation & Health Care); Petersen Health Care II, Inc. (d/b/a Simple Blessings); Petersen Health Care III, LLC; Petersen Health Care Management, LLC; Petersen Health Care V, LLC; Petersen Health Care VII, LLC; Petersen Health Care VIII, LLC; Petersen Health Care X, LLC (d/b/a Flora Gardens Care Center; Nokomis Rehabilitation & Health Care Center; Rochelle Gardens Care Center; Rochelle Rehabilitation & Health Care Center; Whispering Oaks Care Center; and Willow Rose Rehab & Health Care); Petersen Health Care XI, LLC (d/b/a Sandwich Rehabilitation & Health Care Center); Petersen Health Care XIII, LLC (d/b/a Rock Falls Rehabilitation & Health Care Center) Petersen Health Care, Inc. (d/b/a Countryview Terrace; Courtyard Estates of Canton; and Riverview Estates of Havana); Petersen Health Enterprises, LLC (d/b/a Sheldon Health Care Center); Petersen Health Group, LLC; Petersen Health Network, LLC (d/b/a Flora Gardens Care Center; Nokomis Rehabilitation & Health Care Center; Rochelle Gardens Care Center; Rochelle Rehabilitation & Health Care Center; Whispering Oaks Care Center; and Willow Rose Rehab & Health Care); Petersen Health Properties, LLC (d/b/a Countryview Care of Macomb; Jonesboro Rehabilitation & Health Care Center; and South Elgin Rehabilitation & Health Care Center); Petersen Health Quality, LLC (d/b/a Countryview Terrace); Petersen Health Systems, Inc. (d/b/a Courtyard Estates of Herscher; Courtyard Estates of Farmington; Courtyard Estates of Galva; and Courtyard Estates of Green Valley); Petersen Management Company, LLC (d/b/a Flora

Rehabilitation & Health Care Center; Palm Terrace of Mattoon; Flora Rehabilitation & Health Care Center; Toulon Rehabilitation & Health Care Center; Mt. Vernon Health Care Center; and White Oak Rehabilitation & Health Care Center); Petersen MT, LLC; Petersen MT3, LLC; Petersen Roseville, LLC (d/b/a Roseville Rehabilitation & Health Care Center); Piper HCO, LLC (d/b/a Piper City Rehab & Living Center and Courtyard Estates of Piper City); Piper RE, LLC (d/b/a Piper City Rehab & Living Center and Courtyard Estates of Piper City); Pleasant View HCO, LLC (d/b/a Pleasant View Rehabilitation & Health Care Center); Pleasant View RE, LLC (d/b/a Pleasant View Rehabilitation & Health Care Center); Polo - PHC, Inc. (d/b/a Polo Rehabilitation & Health Care); Polo, LLC (d/b/a Polo Rehabilitation & Health Care); Prairie City HCO, LLC (d/b/a Prairie City Rehabilitation & Health Care Center); Prairie City RE, LLC (d/b/a Prairie City Rehabilitation & Health Care Center); Robings HCO, LLC (d/b/a Robings Manor Rehabilitation & Health Care); Robings, LLC (d/b/a Robings Manor Rehabilitation & Health Care and Courtyard Estates of Brighton); Rosiclare HCO, LLC (d/b/a Rosiclare Rehabilitation & Health Care Center); Rosiclare RE, LLC (d/b/a Rosiclare Rehabilitation & Health Care Center); Royal HCO, LLC (d/b/a Royal Oaks Care Center); Royal RE, LLC (d/b/a Royal Oaks Care Center); SABL, LLC; SC Healthcare Holding, LLC; Shangri La HCO, LLC (d/b/a Shangri La Rehab & Living Center); Shangri La RE, LLC (d/b/a Shangri La Rehab & Living Center); Shelbyville HCO, LLC (d/b/a Shelbyville Rehabilitation & Health Care Center); Shelbyville RE, LLC (d/b/a Shelbyville Rehabilitation & Health Care Center); SJL Health Systems, Inc. (d/b/a Prairie Rose Health Care Center); South Elgin, LLC (d/b/a South Elgin Rehabilitation & Health Care Center); Sullivan AL RE, LLC (d/b/a Courtyard Estates of Sullivan); Sullivan HCO, LLC (d/b/a Sullivan Rehabilitation & Health Care Center); Sullivan RE, LLC (d/b/a Sullivan Rehabilitation & Health Care Center); Swansea HCO, LLC (d/b/a Swansea Rehabilitation & Health Care Center); Swansea



RE, LLC (d/b/a Swansea Rehabilitation & Health Care Center); Tarkio HCO, LLC (d/b/a Tarkio Rehabilitation & Health Care); Tarkio RE, LLC (d/b/a Tarkio Rehabilitation & Health Care); Tuscola HCO, LLC (d/b/a Tuscola Health Care Center); Tuscola RE, LLC (d/b/a Tuscola Health Care Center); Twin HCO, LLC (d/b/a Twin Lakes Rehab & Health Care); Twin RE, LLC (d/b/a Twin Lakes Rehab & Health Care); Vandalia HCO, LLC (d/b/a Vandalia Rehabilitation & Health Care Center); Vandalia RE, LLC (d/b/a Vandalia Rehabilitation & Health Care Center); Village Kewanee HCO, LLC (d/b/a Courtyard Village of Kewanee); Walcott AL RE, LLC (Courtyard Estates of Walcott); War Drive, LLC; Watseka HCO, LLC (d/b/a Watseka Rehabilitation & Health Care Center); Watseka RE, LLC (d/b/a Watseka Rehabilitation & Health Care Center); Westside HCO, LLC (d/b/a Westside Rehabilitation & Care Center); Westside RE, LLC; and XCH, LLC, including their predecessors or successors, assigns, prior or current parents, partners, subsidiaries, affiliates or controlled companies, and each of their prior or current officers, directors, employees, agents, and attorneys.

3. “Insider” shall mean “insider” as defined by 11 U.S. Code § 101(31).

4. “Mark Petersen” means an individual, who is the Chief Executive Officer and ultimate owner of the Debtors.

5. “Petersen Non-Debtor Entities” or “You” shall mean: Mark Petersen, Candle Hospitality, LLC; Charleston - PHC, Inc.; Charleston HCC, LLC; Charter Bus Company, LLC; Cumberland - PHC, Inc.; Cumberland HCC, LLC; Neeley, LLC; Neeley Incorporated Cell; Petersen Companies, LLC; Petersen Hospitality, LLC; Petersen Hotels, LLC; Plaza West Development, LLC; Twenty Four Corp, LLC and any other entity or business operated, or owned (directly or indirectly) by Mark Petersen, or in which Mark Petersen owns or owned (directly or indirectly) any interest, whether legal or equitable, including but not limited to the entities that

own or owned or operate or operated any hotels (as referenced in Paragraph 19 of *Declaration of David R. Campbell in Support of Debtors' Chapter 11 Petitions and First Day Pleadings* [Docket No. 44]), or any other entity within the Petersen enterprise, and including their predecessors or successors, assigns, prior or current parents, partners, subsidiaries, affiliates or controlled companies, and each of their prior or current officers, directors, employees, agents, and attorneys.

6. "Person" shall mean any natural person or any business, legal, or governmental entity or association.

7. "Receivership Entities" shall mean: El Paso HCC, LLC; Flanagan HCC, LLC; Kewanee AL, LLC; Knoxville AL, LLC; Legacy Estates AL, LLC; Marigold HCC, LLC; Monmouth AL, LLC; Polo LLC; El Paso HCO, LLC; Flanagan HCO, LLC; CYE Kewanee HCO, LLC; CYE Knoxville HCO, LLC; Legacy HCO, LLC; Marigold HCO, LLC; CYE Monmouth HCO LLC; Polo HCO, LLC; Batavia, LLC; Timbercreek HCC, LLC; Fodulac, LLC; Bloomington, LLC; Sunset HCC, LLC; Eastside, LLC; Cisne, LLC; Benton HCC, LLC; Charleston HCO, LLC; Cumberland HCO LLC; Petersen MT4, LLC; Ozark HCC, LLC; Petersen Health Junction, LLC; Petersen Health Operations, LLC, and Petersen MT2, LLC.

8. "Relating to," "Relate(d) to," and "Concerning" shall mean, without limitation, alluding to, constituting, containing, discussing, describing, evidencing, identifying, mentioning, in connection with, pertaining to, referring to, respecting, regarding, responding to, or in any way factually or logically relevant to the matter described in the request.

### **SUBJECT MATTERS**

You are requested to designate a corporate representative or representatives with knowledge of the following subject matters. Unless otherwise indicated, the relevant time period for purposes of examination is from January 1, 2018 to the present.

**Intercompany and Related Party Transactions**

1. Debtors' and Petersen Non-Debtor Entities' intercompany debt and/or obligations (including intercompany notes and guarantees), and the calculations thereof.
2. Relationship and agreements between Debtors, Petersen Non-Debtor Entities, Insiders and/or Affiliates.
3. Transactions between Debtors, Petersen Non-Debtor Entities, Insiders and/or Affiliates.
4. Payments, disbursements and/or transfer of monies and/or assets between Debtors, Petersen Non-Debtor Entities, Insiders and/or Affiliates.
5. Calculation and allocation of costs and expenses between Debtors, Petersen Non-Debtor Entities, Insiders and/or Affiliates.
6. Distributions and/or payments to Debtors, Petersen Non-Debtor Entities', Insiders' and/or Affiliates' owner(s), shareholders, officers, directors, members, partners, Insiders, or the like.
7. Intercompany receivables and payables between Debtors, Petersen Non-Debtor Entities, Insiders and/or Affiliates.

**Financial Information**

8. Petersen Non-Debtor Entities' financial performance.
9. Financial projections including any projected income statements, balance sheets and statements of cash flow for Petersen Non-Debtor Entities.
10. Accounts payable and accounts receivable of Petersen Non-Debtor Entities.
11. Books and records of Petersen Non-Debtor Entities.
12. Assets and liabilities of the Petersen Non-Debtor Entities.
13. Tax payments of, to, or from Petersen Non-Debtor Entities.
14. Unpaid or outstanding payroll and other taxes owed to/from Petersen Non-Debtor Entities.
15. Amounts due and owing to/from Centers for Medicare & Medicaid Services or any government or government agency relating to Petersen Non-Debtor Entities.

**Cyberattack**

16. The ransomware attack related to the Petersen Non-Debtor Entities and their response to same.

17. The cyberattack attack related to Petersen Non-Debtor Entities, and their response to same.

UNITED STATES BANKRUPTCY COURT

District of Delaware

In re SC Healthcare Holding, LLC et al. Debtor

Case No. 24-10443 (TMH)

Chapter 11

SUBPOENA FOR RULE 2004 EXAMINATION

To: Petersen Hospitality, LLC; c/o Registered Agent; Marikay Snyder; 830 W. Trailcreek Drive, Peoria, IL 61614 (Name of person to whom the subpoena is directed)

Testimony: YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at an examination under Rule 2004, Federal Rules of Bankruptcy Procedure. A copy of the court order authorizing the examination is attached.

Table with 2 columns: PLACE (Advantage Reporting Service, 110 SW Jefferson Ave., Suite #430, Peoria, IL, 61602) and DATE AND TIME (July 29, 2024 at 9:00 a.m. (CT))

The examination will be recorded by this method: Stenographic and audiovisual means

Production: You, or your representatives, must also bring with you to the examination the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material:

You are also COMMANDED and DIRECTED to produce all documents responsive to the categories set forth in the Document Requests attached hereto by July 18, 2024 at 4:00 p.m. ET, by electronic means to counsel for the Committee (Dennis Meloro at Dennis.Meloro@gtlaw.com, Danielle Kemp at kempd@gtlaw.com and Martin Kedziora at kedzioram@gtlaw.com).

The following provisions of Fed. R. Civ. P. 45, made applicable in bankruptcy cases by Fed. R. Bankr. P. 9016, are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and 45(g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: June 28, 2024

CLERK OF COURT

OR

/s/ Dennis Meloro

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, email address, and telephone number of the attorney representing (name of party) The Official Committee of Unsecured Creditors, who issues or requests this subpoena, are:

Dennis Meloro c/o Greenberg Traurig, LLP; 222 Delaware Ave., Suite 1600, Wilmington, DE 19801; Telephone: 302.661-7000; email: dennis.meloro@gtlaw.com.

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things, or the inspection of premises before trial, a notice and a copy of this subpoena must be served on each party before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

**PROOF OF SERVICE**

**(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)**

I received this subpoena for *(name of individual and title, if any)*: \_\_\_\_\_  
on *(date)* \_\_\_\_\_.

I served the subpoena by delivering a copy to the named person as follows: \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_ ; or

I returned the subpoena unexecuted because: \_\_\_\_\_  
\_\_\_\_\_

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of \$ \_\_\_\_\_.

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ \_\_\_\_\_.

I declare under penalty of perjury that this information is true and correct.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information concerning attempted service, etc.:

**Federal Rule of Civil Procedure 45(c), (d), (e), and (g) (Effective 12/1/13)**  
**(made applicable in bankruptcy cases by Rule 9016, Federal Rules of Bankruptcy Procedure)**

**(c) Place of compliance.**

(1) *For a Trial, Hearing, or Deposition.* A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
  - (i) is a party or a party's officer; or
  - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) *For Other Discovery.* A subpoena may command:

- (A) production of documents, or electronically stored information, or things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises, at the premises to be inspected.

**(d) Protecting a Person Subject to a Subpoena; Enforcement.**

(1) *Avoiding Undue Burden or Expense; Sanctions.* A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction — which may include lost earnings and reasonable attorney's fees — on a party or attorney who fails to comply.

(2) *Command to Produce Materials or Permit Inspection.*

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing or sampling any or all of the materials or to inspecting the premises — or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) *Quashing or Modifying a Subpoena.*

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

**(e) Duties in Responding to a Subpoena.**

(1) *Producing Documents or Electronically Stored Information.* These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) *Claiming Privilege or Protection.*

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

...  
(g) **Contempt.** The court for the district where compliance is required — and also, after a motion is transferred, the issuing court — may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

**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

**DOCUMENT REQUESTS**

Pursuant to the Court’s June 25, 2024 Order Granting the *Motion of the Official Committee of Unsecured Creditors for Discovery and Examination of The Petersen Non-Debtor Entities Pursuant to Bankruptcy Rule 2004* [Docket No. 560] (“Order”), Rule 2004 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and Rule 2004-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), or any other applicable law or rule, the Official Committee of Unsecured Creditors (the “Committee”) hereby requests that Mark Petersen and each of the Petersen Non-Debtor Entities, as that term is defined below, serve a written response and produce documents responsive to the requests set forth below (the “Requests”) on a rolling basis following the entry of this Order so as to be completed no later than July 18, 2024 at 4:00 p.m. (Prevailing Eastern Time), by electronic means to counsel for the Committee (Dennis Meloro at [Dennis.Meloro@gtlaw.com](mailto:Dennis.Meloro@gtlaw.com), Danielle Kemp at [kempd@gtlaw.com](mailto:kempd@gtlaw.com) and Martin Kedziora at [kedzioram@gtlaw.com](mailto:kedzioram@gtlaw.com)).

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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, 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.kccllc.net/Petersen](http://www.kccllc.net/Petersen).



## DEFINITIONS

The Requests, as well as the instructions provided below, are subject to and incorporate the following definitions and instructions as used herein, regardless of whether upper- or lower-case letters are used:

1. “Affiliate” shall have the same definition as set forth under section 101(2) of the Bankruptcy Code.

2. “Bank Account” as used in the requests shall mean checking account(s), savings account(s), deposit account(s), money market account(s), wire transfer account(s), loan account(s), retirement account(s), or other account(s) or any other depository arrangement(s) with a financial institution, savings association or credit union.

3. “Bank Account Records” includes any and all records associated with a given Bank Account, including without limitation bank statements, loan statements, cancelled checks (fronts and backs), items of deposit, items of withdraw, any financial instruments created from the account (e.g., money orders), wire transfer documents, loan documents and any record showing the source of funds or assets transferred into the account or the location of funds or assets transferred out of the account.

4. “Communication” shall mean and refer to any oral, written, or electronic transmittal of information or request for information made from one person to another person, whether made in person, electronically, by telephone, or by any other means and includes any document(s) made for the purpose of recording a communication, a fact, an idea, a statement, an inquiry, an opinion, a belief, or otherwise.

5. “Document” and “Documents” are used herein in their customary broad sense allowed by Federal Rule of Civil Procedure 34(a) and Federal Rule of Evidence 1001, and include,

without limitation, any kind of printed, recorded, written, graphic, or photographic matter (including tape recordings), however printed, produced, reproduced, coded, or stored, of any kind or description, whether sent or received or not, including originals, copies, drafts, and both sides thereof, and including papers, books, charts, graphs, photographs, drawings, correspondence, telegrams, cables, telex messages, memoranda, notes, notations, work papers, routing slips, intra- and inter-office communications, electronic mail, affidavits, statements, opinions, court pleadings, reports, indices, studies, analyses, forecasts, evaluations, contracts, computer printouts, data processing input and output, computer programs, microfilms, microfiche, all other records kept by electronic, photographic, or mechanical means, and things similar to any of the foregoing, regardless of their author or origin, of any kind.

6. “Debtors” shall mean: the Receivership Entities; Aledo HCO, LLC (d/b/a Aledo Rehabilitation & Health Care Center); Aledo RE, LLC (d/b/a Aledo Rehabilitation & Health Care Center); Arcola HCO, LLC (d/b/a Arcola Health Care); Arcola RE, LLC (d/b/a Arcola Health Care); Aspen HCO, LLC (d/b/a Aspen Rehab & Health Care); Aspen RE, LLC (d/b/a Aspen Rehab & Health Care); Bement HCO, LLC (d/b/a Bement Health Care Center); Bement RE, LLC (d/b/a Bement Health Care Center); Betty’s Garden HCO, LLC (d/b/a Betty’s Garden Memory Care of Kewanee); Betty’s Garden RE, LLC (d/b/a Betty’s Garden Memory Care of Kewanee); Bradford AL RE, LLC (d/b/a Courtyard Estates of Bradford); Bushnell AL RE, LLC (d/b/a Courtyard Estates of Bushnell); Casey HCO, LLC (d/b/a Casey Health Care Center); Collinsville HCO, LLC (d/b/a Collinsville Rehabilitation & Health Care Center); Collinsville RE, LLC (d/b/a Collinsville Rehabilitation & Health Care Center); CYE Bradford HCO, LLC (d/b/a Courtyard Estates of Bradford); CYE Bushnell HCO, LLC (d/b/a Courtyard Estates of Bushnell); CYE Girard HCO, LLC (d/b/a Courtyard Estates of Girard); CYE Kewanee- PHC,

Inc. (d/b/a Courtyard Estates of Kewanee); CYE Knoxville - PHC, Inc (d/b/a Courtyard Estates of Knoxville); CYE Monmouth - PHC, Inc (d/b/a Courtyard Estates of Monmouth); CYE Sullivan HCO, LLC (d/b/a Courtyard Estates of Sullivan); CYE Walcott HCO, LLC (d/b/a Courtyard Estates of Walcott); CYV Kewanee AL RE, LLC (d/b/a Courtyard Village of Kewanee); Decatur HCO, LLC (d/b/a Decatur Rehabilitation & Health Care Center); Decatur RE, LLC (d/b/a Decatur Rehabilitation & Health Care Center); Eastview HCO, LLC (d/b/a Eastview Terrace); Eastview RE, LLC (d/b/a Eastview Terrace); Effingham HCO, LLC (d/b/a Effingham Rehabilitation & Health Care Center); Effingham RE, LLC (d/b/a Effingham Rehabilitation & Health Care Center); El Paso - PHC, Inc (d/b/a El Paso Health Care Center); Flanagan - PHC, Inc. (d/b/a Flanagan Rehabilitation & Health Care Center); Havana HCO, LLC (d/b/a Havana Health Care Center); Havana RE, LLC (d/b/a Havana Health Care Center); Jonesboro, LLC (d/b/a Jonesboro Rehabilitation & Health Care Center); Kewanee HCO, LLC (d/b/a Kewanee Care Home); Kewanee, LLC (d/b/a Kewanee Care Home); Knoxville & Pennsylvania, LLC; Lebanon HCO, LLC (d/b/a Lebanon Care Center); Lebanon RE, LLC (d/b/a Lebanon Care Center); Legacy PHC, Inc. (d/b/a Legacy Estates of Monmouth); Macomb, LLC (d/b/a Countryview Care Center of Macomb); Marigold – PHC, Inc. (d/b/a Marigold Rehabilitation & Health Care Center); MBP Partner, LLC; McLeansboro HCO, LLC (d/b/a McLeansboro Rehabilitation & Health Care Center); McLeansboro RE, LLC (d/b/a McLeansboro Rehabilitation & Health Care Center); Midwest Health Operations, LLC (d/b/a Cornerstone Rehabilitation & Health Care Center; Sauk Valley Senior Living & Rehabilitation Center; Shawanee Rose Care; and CenterRock River Gardens); Midwest Health Properties, LLC (d/b/a Cornerstone Rehabilitation & Health Care Center; Sauk Valley Senior Living & Rehabilitation Center; Shawanee Rose Care; and CenterRock River Gardens); North Aurora

HCO, LLC (d/b/a North Aurora Care Center); North Aurora, LLC (d/b/a North Aurora Care Center); Petersen 23, LLC (d/b/a Palm Terrace of Mattoon); Petersen 25, LLC (d/b/a Casey Health Care Center); Petersen 26, LLC (d/b/a Flora Rehabilitation & Health Care Center); Petersen 27, LLC (d/b/a Toulon Rehabilitation & Health Care Center); Petersen 29, LLC (d/b/a Mt. Vernon Health Care Center); Petersen 30, LLC (d/b/a White Oak Rehabilitation & Health Care Center); Petersen Farmer City, LLC (d/b/a Farmer City Rehab & Health Care); Petersen Health & Wellness, LLC (d/b/a Enfield Rehabilitation & Health Care Center; Rock Falls Rehabilitation & Health Care Center; and Newman Rehabilitation & Health Care Center); Petersen Health Business, LLC (d/b/a Sandwich Rehabilitation & Health Care Center); Petersen Health Care - Farmer City, LLC (d/b/a Farmer City Rehab & Health Care); Petersen Health Care - Illini, LLC (d/b/a Illini Heritage Rehab & Health Care); Petersen Health Care - Roseville, LLC (d/b/a Roseville Rehabilitation & Health Care); Petersen Health Care II, Inc. (d/b/a Simple Blessings); Petersen Health Care III, LLC; Petersen Health Care Management, LLC; Petersen Health Care V, LLC; Petersen Health Care VII, LLC; Petersen Health Care VIII, LLC; Petersen Health Care X, LLC (d/b/a Flora Gardens Care Center; Nokomis Rehabilitation & Health Care Center; Rochelle Gardens Care Center; Rochelle Rehabilitation & Health Care Center; Whispering Oaks Care Center; and Willow Rose Rehab & Health Care); Petersen Health Care XI, LLC (d/b/a Sandwich Rehabilitation & Health Care Center); Petersen Health Care XIII, LLC (d/b/a Rock Falls Rehabilitation & Health Care Center) Petersen Health Care, Inc. (d/b/a Countryview Terrace; Courtyard Estates of Canton; and Riverview Estates of Havana); Petersen Health Enterprises, LLC (d/b/a Sheldon Health Care Center); Petersen Health Group, LLC; Petersen Health Network, LLC (d/b/a Flora Gardens Care Center; Nokomis Rehabilitation & Health Care Center; Rochelle Gardens Care Center; Rochelle Rehabilitation & Health Care

Center; Whispering Oaks Care Center; and Willow Rose Rehab & Health Care); Petersen Health Properties, LLC (d/b/a Countryview Care of Macomb; Jonesboro Rehabilitation & Health Care Center; and South Elgin Rehabilitation & Health Care Center); Petersen Health Quality, LLC (d/b/a Countryview Terrace); Petersen Health Systems, Inc. (d/b/a Courtyard Estates of Herscher; Courtyard Estates of Farmington; Courtyard Estates of Galva; and Courtyard Estates of Green Valley); Petersen Management Company, LLC (d/b/a Flora Rehabilitation & Health Care Center; Palm Terrace of Mattoon; Flora Rehabilitation & Health Care Center; Toulon Rehabilitation & Health Care Center; Mt. Vernon Health Care Center; and White Oak Rehabilitation & Health Care Center); Petersen MT, LLC; Petersen MT3, LLC; Petersen Roseville, LLC (d/b/a Roseville Rehabilitation & Health Care Center); Piper HCO, LLC (d/b/a Piper City Rehab & Living Center and Courtyard Estates of Piper City); Piper RE, LLC (d/b/a Piper City Rehab & Living Center and Courtyard Estates of Piper City); Pleasant View HCO, LLC (d/b/a Pleasant View Rehabilitation & Health Care Center); Pleasant View RE, LLC (d/b/a Pleasant View Rehabilitation & Health Care Center); Polo - PHC, Inc. (d/b/a Polo Rehabilitation & Health Care); Polo, LLC (d/b/a Polo Rehabilitation & Health Care); Prairie City HCO, LLC (d/b/a Prairie City Rehabilitation & Health Care Center); Prairie City RE, LLC (d/b/a Prairie City Rehabilitation & Health Care Center); Robings HCO, LLC (d/b/a Robings Manor Rehabilitation & Health Care); Robings, LLC (d/b/a Robings Manor Rehabilitation & Health Care and Courtyard Estates of Brighton); Rosiclare HCO, LLC (d/b/a Rosiclare Rehabilitation & Health Care Center); Rosiclare RE, LLC (d/b/a Rosiclare Rehabilitation & Health Care Center); Royal HCO, LLC (d/b/a Royal Oaks Care Center); Royal RE, LLC (d/b/a Royal Oaks Care Center); SABL, LLC; SC Healthcare Holding, LLC; Shangri La HCO, LLC (d/b/a Shangri La Rehab & Living Center); Shangri La RE, LLC (d/b/a Shangri La Rehab & Living Center);

Shelbyville HCO, LLC (d/b/a Shelbyville Rehabilitation & Health Care Center); Shelbyville RE, LLC (d/b/a Shelbyville Rehabilitation & Health Care Center); SJL Health Systems, Inc. (d/b/a Prairie Rose Health Care Center); South Elgin, LLC (d/b/a South Elgin Rehabilitation & Health Care Center); Sullivan AL RE, LLC (d/b/a Courtyard Estates of Sullivan); Sullivan HCO, LLC (d/b/a Sullivan Rehabilitation & Health Care Center); Sullivan RE, LLC (d/b/a Sullivan Rehabilitation & Health Care Center); Swansea HCO, LLC (d/b/a Swansea Rehabilitation & Health Care Center); Swansea RE, LLC (d/b/a Swansea Rehabilitation & Health Care Center); Tarkio HCO, LLC (d/b/a Tarkio Rehabilitation & Health Care); Tarkio RE, LLC (d/b/a Tarkio Rehabilitation & Health Care); Tuscola HCO, LLC (d/b/a Tuscola Health Care Center); Tuscola RE, LLC (d/b/a Tuscola Health Care Center); Twin HCO, LLC (d/b/a Twin Lakes Rehab & Health Care); Twin RE, LLC (d/b/a Twin Lakes Rehab & Health Care); Vandalia HCO, LLC (d/b/a Vandalia Rehabilitation & Health Care Center); Vandalia RE, LLC (d/b/a Vandalia Rehabilitation & Health Care Center); Village Kewanee HCO, LLC (d/b/a Courtyard Village of Kewanee); Walcott AL RE, LLC (Courtyard Estates of Walcott); War Drive, LLC; Watseka HCO, LLC (d/b/a Watseka Rehabilitation & Health Care Center); Watseka RE, LLC (d/b/a Watseka Rehabilitation & Health Care Center); Westside HCO, LLC (d/b/a Westside Rehabilitation & Care Center); Westside RE, LLC; and XCH, LLC, including their predecessors or successors, assigns, prior or current parents, partners, subsidiaries, affiliates or controlled companies, and each of their prior or current officers, directors, employees, agents, and attorneys.

7. “ESI” means electronically stored information.
8. “Insider” shall mean “insider” as defined by 11 U.S. Code § 101(31).

9. “Mark Petersen” means an individual, who is the Chief Executive Officer and ultimate owner of the Debtors.

10. “Petersen Non-Debtor Entities” or “You” shall mean: Mark Petersen, Candle Hospitality, LLC; Charleston - PHC, Inc.; Charleston HCC, LLC; Charter Bus Company, LLC; Cumberland - PHC, Inc.; Cumberland HCC, LLC; Neeley, LLC; Neeley Incorporated Cell; Petersen Companies, LLC; Petersen Hospitality, LLC; Petersen Hotels, LLC; Plaza West Development, LLC; Twenty Four Corp, LLC and any other entity or business operated, or owned (directly or indirectly) by Mark Petersen, or in which Mark Petersen owns or owned (directly or indirectly) any interest, whether legal or equitable, including but not limited to the entities that own or owned or operate or operated any hotels (as referenced in Paragraph 19 of *Declaration of David R. Campbell in Support of Debtors’ Chapter 11 Petitions and First Day Pleadings* [Docket No. 44]), or any other entity within the Petersen enterprise, and including their predecessors or successors, assigns, prior or current parents, partners, subsidiaries, affiliates or controlled companies, and each of their prior or current officers, directors, employees, agents, and attorneys.

11. “Receivership Entities” shall mean: El Paso HCC, LLC; Flanagan HCC, LLC; Kewanee AL, LLC; Knoxville AL, LLC; Legacy Estates AL, LLC; Marigold HCC, LLC; Monmouth AL, LLC; Polo LLC; El Paso HCO, LLC; Flanagan HCO, LLC; CYE Kewanee HCO, LLC; CYE Knoxville HCO, LLC; Legacy HCO, LLC; Marigold HCO, LLC; CYE Monmouth HCO LLC; Polo HCO, LLC; Batavia, LLC; Timbercreek HCC, LLC; Fodulac, LLC; Bloomington, LLC; Sunset HCC, LLC; Eastside, LLC; Cisne, LLC; Benton HCC, LLC; Charleston HCO, LLC; Cumberland HCO LLC; Petersen MT4, LLC; Ozark HCC, LLC; Petersen Health Junction, LLC; Petersen Health Operations, LLC, and Petersen MT2, LLC.

**INSTRUCTIONS**

1. Unless otherwise indicated, all documents shall be produced for the relevant time period, including any documents having an earlier origin and in use during the relevant time period.

2. Each request solicits all Documents in Your possession, custody, or control, including, but not limited to, all information available to You or obtainable by You, including but not limited to, all Documents in any database or data room.

3. The obligation to produce documents responsive to these Requests shall be continuing in nature, and You are required promptly to produce any document requested herein that You locate or obtain after responding to these Requests, up to the conclusion of the proceedings herein.

4. All responsive documents are to be produced in the same file or other organizational environment in which they are maintained, with a clear indication of where each document ends and the next begins. For example, a document that is part of a file, docket, or other grouping should be physically produced together with all other responsive documents from said file, docket, or grouping, in the same order or manner of arrangement as the original.

5. The response to each and every one of the requests should be separately identified in such a manner as would readily permit determination of the request, or sub-portion thereof, to which they purport to be responsive, including identifying the request for production in response to which the document or thing is being produced.

6. Electronic records and computerized information must be produced in an intelligible format or together with a description of the system from which it was derived sufficient to permit rendering the materials intelligible.



7. Each item produced should bear unique identifying control numbers (e.g., Bates labels) on each item or page if the item is a document, and other documents maintained in electronic form should be produced in machine-readable electronic form.

8. In the event a document is withheld or redacted on a claim of attorney-client or work-product privilege, You shall provide a detailed privilege log that describes the privilege being claimed and the information withheld in a manner that is sufficient to disclose facts upon which You rely in asserting Your claim.

9. The Committee specifically requests production of electronic or magnetic data and ESI. All Documents and image files shall be produced in their native formats, such as Microsoft Word, Word Perfect, Microsoft Excel, PowerPoint, TIF, GIF, JPEG, or PDF. With respect to all other electronic or magnetic data and ESI, produce in ASCII format and for any file-based data, produce in an ASCII delimited text format, identifying the delimiters.

10. Any and all electronically stored documents being produced in response to these requests shall be produced in load file which includes Natives, Text (Doc-Level) and a .dat file with at least the following metadata fields: BEGDOC; ENDDOC; ATTACHMENT RANGE; PARENTID; ATTACHIDS; CUSTODIAN; AUTHOR; TO; FROM; CC; BCC; SUBJECT; TITLE; DOCDATE; DOCTIME; SENTDATE; SENTTIME; RECEIVEDDATE; RECEIVEDTIME; LASTMODDATE; LASTMODTIME; CREATEDATE; CREATETIME; SORTDATE; SORTTIME; FILEPATH; FOLDER; FILENAME; FILEEXT; FULLFILE; DOCTYPE; FILESIZE; MD5HASH; MSGID; CONVINDX; NATIVELINK; TEXTLINK.

11. In the event that any document called for has been lost, destroyed, discarded, or otherwise disposed of, identify the document by identifying: (i) its author or preparer; (ii) all persons to whom distributed or shown; (iii) date; (iv) subject matter; (v) attachments or

appendices; (vi) date, manner, and reason for destruction or other disposition; (vii) person authorizing destruction or other disposition; (viii) the document request or requests to which the document is responsive.

12. Produce all responsive documents as they are kept in the usual course of business, or organize and label them to correspond with the Request to which they are responsive.

13. Unless otherwise indicated in a particular request, these discovery requests seek all Documents and Communications from January 1, 2018 to the present.

## **DOCUMENT REQUESTS**

1. All Documents reflecting the ownership interests in or of the Petersen Non-Debtor Entities.
2. All Documents and Communications concerning all financial and valuation reports of the Petersen Non-Debtor Entities.
3. All Documents and Communications relating to the Petersen Non-Debtor Entities' financial information or condition.
4. All Documents and Communications concerning any off-balance sheet commitments, transactions and/or contingent liabilities of the Petersen Non-Debtor Entities.
5. All Documents evidencing credit agreements, forbearance agreements, amendments, pledges, guarantees, promissory notes, waivers, intercreditor or subordination agreements and/or fee letters relating to any debt of the Petersen Non-Debtor Entities.
6. All audited and unaudited financial statements of the Petersen Non-Debtor Entities.
7. All income statements, balance sheets, and cash flows of the Petersen Non-Debtor Entities with details of any adjusting journal entries and associated working papers.
8. All Documents and Communications concerning the Debtors' and Petersen Non-Debtor Entities' intercompany debt and/or obligations (including intercompany notes and guarantees), and the calculations thereof.
9. All Documents and Communications relating to any intercompany agreements, including, without limitation, any Documents supporting the methodology adopted to allocate costs and expenses between the Debtors, Petersen Non-Debtor Entities, Insiders, and Affiliates.
10. All Documents and Communications relating to the calculation of all expenses allocated to each of the Debtors, Petersen Non-Debtor Entities, Insiders, and Affiliates, and support for expenses attributed to each.
11. All Documents and Communications relating to transactions and/or services provided by the Debtors to any Petersen Non-Debtor Entities, Insiders, and/or Affiliates.
12. All Documents and Communications relating to transactions and/or services provided to the Debtors by Petersen Non-Debtor Entities, Insiders, and/or Affiliates.
13. All Documents and Communications relating to any transactions between the Debtors and Petersen Non-Debtor Entities, Insiders, and/or Affiliates.
14. All Documents and Communications, including any contracts and agreements, concerning cash receipts and disbursements to, and/or transactions, receivable/payable balances or write-offs with any of the Debtors, Petersen Non-Debtor Entities, Insiders, and/or Affiliates.

15. All Documents reflecting any payments, disbursements and/or transfer of monies and/or assets from the Debtors to any Petersen Non-Debtor Entities, Insiders, and/or Affiliates.

16. All Documents reflecting any payments, disbursements and/or transfer of monies and/or assets to the Debtors from any Petersen Non-Debtor Entities, Insiders, and/or Affiliates.

17. All Documents and Communications relating to receivable/payable balances and/or write-offs with any Debtors, Insiders, and/or Affiliates.

18. All Documents that reflect distributions and/or payments to Debtors' and Petersen Non-Debtor Entities' owner(s), shareholders, officers, directors, members, partners, Insiders or the like, including but not limited to salaries, draws, and commissions.

19. All Documents, including Bank Account Records, from each and every financial institution relating to any Bank Account of the Petersen Non-Debtor Entities, Insiders, and/or Affiliates.

20. All Documents relating to any property conveyed by Debtors to Petersen Non-Debtor Entities, Insiders, and/or Affiliates.

21. All Documents sufficient to identify any assets or property (whether real property or personal property) in which Petersen Non-Debtor Entities may have or had an interest.

Dated: June 28, 2024

**GREENBERG TRAURIG, LLP**

*/s/ Dennis A. Meloro*

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Dennis A. Meloro (No. 4435)  
222 Delaware Avenue, Suite 1600  
Wilmington, DE 19801  
Telephone: (302) 661-7000  
Facsimile: (302) 661-7360  
Email: MeloroD@gtlaw.com

-and-

Nancy A. Peterman (admitted *pro hac vice*)  
Danny Duerdoth (admitted *pro hac vice*)  
77 West Wacker Drive, Suite 3100  
Chicago, IL 60601  
Telephone: (312) 456-8400  
Facsimile: (312) 456-8435  
Emails: PetermanN@gtlaw.com  
DuerdothD@gtlaw.com

*Counsel for the Official Committee  
of Unsecured Creditors*