

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

In re:

SC HEALTHCARE HOLDINGS, LLC
et al.,

Debtors.¹

Chapter 11

Case No. 24-10443 (TMH)

Jointly Administered

Re: D.I. 662

Hearing Date: July 30, 2024 at 10:00 a.m. (ET)

**JOINDER OF THE BANK OF FARMINGTON TO OBJECTION OF BANK OF
RANTOUL TO DEBTORS' MOTION FOR AN ORDER (I) AUTHORIZING
AND APPROVING PROCEDURES FOR THE SALE, TRANSFER,
OR ABANDONMENT OF CERTAIN DE MINIMUS ASSETS, AND
(III) GRANTING RELATED RELIEF**

The Bank of Farmington (“BOF”), by and through its undersigned counsel, Womble Bond Dickinson (US) LLP, hereby files this joinder (the “Joinder”) to the *Objection of Bank of Rantoul* (the “Bank of Rantoul Objection”) to *Debtors’ Motion for an Order (i) Authorizing and Approving Procedures for the Sale, Transfer, or Abandonment of Certain De Minimus Assets, and (iii) Granting Related Relief* (the “Motion”) See D.I. 662. In support of this Joinder, BOF respectfully states as follows:

1. BOF holds liens on nineteen (19) of the Debtors’ vehicles and hereby joins in the arguments raised in the Bank of Rantoul Objection and expressly adopts, raises, and incorporates such arguments therein as if fully set forth herein.

2. BOF reserves the right to supplement and join in any other filings, and to present

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.



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supplemental and further arguments at the hearing on the Motion.

3. BOF respectfully requests that the Court enter an Order sustaining the Bank of Rantoul Objection for the reasons set forth therein.

Dated: July 23, 2024
Wilmington, Delaware

/s/ Matthew P. Ward

WOMBLE BOND DICKINSON (US) LLP

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Counsel to Bank of Farmington

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CERTIFICATE OF SERVICE

I, Matthew P. Ward, herby certify that on July 23, 2024, I caused a true and correct copy of the *Joinder of the Bank of Farmington to Objection of Bank of Rantoul to Debtors' Motion for an Order (I) Authorizing and Approving Procedures for the Sale, Transfer, or Abandonment of Certain De Minimus Assets, and (III) Granting Related Relief* to be electronically filed and served via CM/ECF upon all parties authorized to receive electronic notice in this matter, including the following:

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/s/ Matthew P. Ward

Matthew P. Ward (DE Bar No. 4471)