

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

In re:

SC HEALTHCARE HOLDING, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 24-10443 (TMH)

(Jointly Administered)

Re Dkt. Nos. 761 & 762

**CERTIFICATE OF NO OBJECTION REGARDING FIRST INTERIM
FEE APPLICATIONS FOR PATIENT CARE OMBUDSMAN PROFESSIONALS**

I, Cheryl A. Santaniello, of Porzio, Bromberg & Newman, P.C. (“Porzio”), counsel to Suzanne Koenig, the patient care ombudsman (“Ombudsman”) appointed in the above-captioned bankruptcy cases (the “Chapter 11 Cases”), hereby certify as follows:

1. Porzio and SAK Management Services, LLC d/b/a SAK Healthcare (“SAK” and collectively with Porzio, the “Professionals”) retained by the Ombudsman filed the following interim fee applications (collectively, the “Interim Fee Applications”) on August 14, 2024:

- a. First Interim Fee Application of Porzio, Bromberg & Newman, P.C., as Counsel to the Patient Care Ombudsman, for Allowance of Compensation and Reimbursement of Expenses for the Period of April 18, 2024 through June 30, 2024 [D.I. 761]; and
- b. First Interim Fee Application of SAK Management Services, LLC d/b/a SAK Healthcare, as Medical Operations Advisor to the Patient Care Ombudsman, for Allowance of Compensation and Reimbursement of Expenses for the Period of April 16, 2024 through June 30, 2024 [D.I. 762].

2. The undersigned hereby certifies that, as of the date hereof, no answer, objection nor other responsive pleading has been received to the Interim Fee Applications.

¹The 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.



3. The undersigned further certifies that after reviewing the Court's docket in this case, no formal answer, objection or other responsive pleading to the Interim Fee Applications appear thereon.

4. Responses or objections to the Interim Fee Applications were to be filed and served no later than September 4, 2024 at 4:00 p.m. (EST).

5. The Professionals seek approval of all fees and expenses sought by the Interim Fee Applications on an interim basis. Attached hereto as **Exhibit A** is a proposed form of omnibus order approving the Interim Fee Applications (the "Proposed Omnibus Fee Order").

6. Accordingly, the Professionals respectfully request that the Court enter the Proposed Omnibus Fee Order at its earliest convenience.

Date: September 10, 2024
Wilmington, Delaware

/s/ Cheryl A. Santaniello
Cheryl A. Santaniello, Esq. (DE Bar No. 5062)
Porzio, Bromberg & Newman, P.C.
300 Delaware Avenue, Suite 1220
Wilmington, Delaware 19801
Telephone: (302) 526-1235
Facsimile: (302) 416-6064
Email: casantaniello@pbnlaw.com

-and-

Robert M. Schechter, Esq. (*Pro Hac Vice*)
Christopher P. Mazza, Esq. (*Pro Hac Vice*)
Porzio, Bromberg & Newman, P.C.
100 Southgate Parkway
P.O. Box 1997
Morristown, New Jersey 07962
Telephone: (973) 538-4006
Facsimile: (973) 538-5146
Email: rmschechter@pbnlaw.com
Email: cpmazza@pbnlaw.com

Counsel for the Patient Care Ombudsman

EXHIBIT "A"

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

In re:

SC HEALTHCARE HOLDING, LLC, *et al.*,¹

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**OMNIBUS ORDER APPROVING FIRST INTERIM FEE
APPLICATIONS FOR PATIENT CARE OMBUDSMAN PROFESSIONALS**

Upon consideration of the interim fee applications of professionals (collectively, the “Professionals”) retained in the bankruptcy cases of the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”) for allowance of compensation and reimbursement of expenses for the period for the first interim fee period (collectively, the “Interim Fee Applications”); and it appearing to the Court that all of the requirements of sections 327, 328, 330, 331 and 503(b) of title 11 of the United States Code, as well as Rule 2016 of the Federal Rules of Bankruptcy Procedure and Rule 2016-2 of the Local Rules of Bankruptcy Practice and Procedure for the United States Bankruptcy Court for the District of Delaware, have been satisfied; and it further appearing that the expenses incurred were reasonable and necessary; and that notices of the Interim Fee Applications were appropriate; and after due deliberation and sufficient good cause appearing therefore;

IT IS HEREBY ORDERED THAT:

¹The 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.

1. The Interim Fee Applications are APPROVED on an interim basis in the amount set forth on the attached **Exhibit A**.
2. The Professionals are granted allowance of compensation on an interim basis in the amount set forth on **Exhibit A** attached hereto.
3. The Professionals are granted reimbursement of expenses on a final basis in the amount set forth on **Exhibit A** attached hereto.
4. The Debtors are authorized and directed, as provided herein, to remit, or caused to be remitted, payment in the amount set forth on **Exhibit A** attached hereto.
5. The Court shall retain jurisdiction with respect to all matters arising from or related to the implementation of this Order.

EXHIBIT A

Interim Fee Application Chart

Professional	Role	Retention Date	Compensation Period	Fees Requested	Expenses Requested	Total Fees & Expenses	Fees Paid to Date	Expenses Paid to Date	Net Total Payment Outstanding
Porzio, Bromberg & Newman, P.C.	Counsel to the Patient Care Ombudsman	May 24, 2024 <i>nunc pro tunc</i> April 18, 2024	April 18, 2024 through June 30, 2024	\$137,337.50	\$879.72	\$138,217.22	\$109,870.00	\$879.72	\$27,467.50
SAK Management Services, LLC d/b/a SAK Healthcare	Medical Operations Advisor to the Patient Care Ombudsman	May 24, 2024 <i>nunc pro tunc</i> April 16, 2024	April 16, 2024 through June 30, 2024	\$278,525.00	\$19,645.52	\$298,170.52	\$222,820.00	\$19,645.52	\$57,705.00