

**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)

**AMENDED NOTICE OF RULE 2004 EXAMINATION OF THE DEBTORS  
BY THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS**

To: SC Healthcare Holding, LLC, *et al.*  
c/o Scott Ahmad  
Winston & Strawn LLP  
35 W. Wacker Drive  
Chicago, IL 60601

**PLEASE TAKE NOTICE THAT** pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2004-1(c)(i) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware, and Rule 30(b)(6) of the Federal Rules of Civil Procedure (“Federal Rules”), made applicable by Bankruptcy Rules 9014 and 7030, the Official Committee of Unsecured Creditors (the “Committee”) shall take the examination of the above-captioned debtors and debtors in possession (collectively, the “Debtors”) by one or more corporate witnesses designated by the Debtors to testify on their behalf and with respect to the topics set forth in **Exhibit A** attached hereto.

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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, which are 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 will be made available on a website of the Debtors’ claims and noticing agent at [www.veritaglobal.net/Petersen](http://www.veritaglobal.net/Petersen).



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The deposition will take place at Winston & Strawn LLP, 35 W. Wacker Drive, Chicago, IL 60601 beginning at **9:30 a.m. Central Standard Time on Thursday, October 3, 2024**. A Zoom link will be provided via email prior to the examination for those who wish to participate by Zoom.

The examination will continue from day to day until completed and will be before an officer authorized by law to administer oaths for the purposes of discovery, for use as evidence at any hearing or trial or for such other purposes allowed under the Federal Rules and Bankruptcy Rules. The examination will be recorded by stenographic and videographic means.

Dated: September 17, 2024  
Wilmington, Delaware

Respectfully submitted,

**GREENBERG TRAURIG, LLP**

*/s/ Dennis A. Meloro*

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**EXHIBIT A**

## DEFINITIONS

In addition 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” or “You” shall mean: 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 MT4, 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. “Non-Debtor Affiliates” mean and includes: (i) Candle Hospitality, LLC; (ii) Charleston - PHC, Inc.; (iii) Charter Bus Company, LLC; (iv) Cumberland - PHC, Inc.; (v) Fondulac, LLC; (vi) Neeley, LLC; (vii) Neeley Incorporated Cell 17; (viii) Petersen Companies, LLC; (ix) Petersen Hospitality, LLC; (x) Petersen Hotels, LLC; (xi) Plaza West Development, LLC; and (xii) Twenty Four Corp, LLC.

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



7. “Petersen Entities” means and includes any 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 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.

8. “Petersen Hotel Business” means and includes any 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]).

9. “Petersen Non-Debtor Entities” means and includes any and all Non-Debtor Affiliates, Petersen Entities, Petersen Hotel Business and/or Mark Petersen.

10. “Receivership Entities” means and includes: 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; Ozark HCC, LLC; Petersen Health Junction, LLC; Petersen Health Operations, LLC; Petersen MT2, LLC; Charleston HCC, LLC; Cumberland HCC LLC; Charleston HCO LLC; and Cumberland HCO LLC.

11. “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**

The Debtors 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.

### **Governance**

1. Debtors' and Receivership Entities' ownership and corporate structure.
2. Debtors' and Receivership Entities' corporate governance.
3. Past and present officers, directors, and agents of the Debtors and Receivership Entities.
4. Corporate minutes, resolutions, and consents of the Debtors and Receivership Entities.

### **Insurance**

5. Insurance policies and insurance coverage for the Debtors and Receivership Entities, their assets, property, employees, or directors and officers (including but not limited to any general liability, professional liability, cybersecurity, and directors and officers' liability).
6. Claims made to any insurer by any Debtors and Receivership Entities, including but not limited to any notices of claim, the insurer's responses and coverage opinions provided.
7. Claims against Debtors and the Receivership Entities and insurance coverage for same (including but not limited to amount of the claims, available insurance coverage, applicable self-insured retention or deductible).

### **Proposed Sale**

8. Proposed reorganization and sale of the assets of the Debtors and Receivership Entities.
9. Valuation of Debtors' and Receivership Entities' assets.
10. Offers or indication of interest to purchase the Debtors and Receivership Entities' assets, business or any portion of their business, equity, membership interests or subsidiaries.

### **Financial Information**

11. Debtors' and Receivership Entities' financial performance.
12. Financial projections including any projected income statements, balance sheets and statements of cash flow for the Debtors and Receivership Entities.

13. Accounts payable and accounts receivable of the Debtors and Receivership Entities.
14. Books and records of the Debtors and Receivership Entities.
15. Assets and liabilities of the Debtors and Receivership Entities.
16. Analysis or evaluation of unsecured creditors' claims.
17. Tax payments of, to, or from Debtors and Receivership Entities.
18. Unpaid or outstanding payroll and other taxes owed to/from Debtors and Receivership Entities.
19. Amounts due and owing to/from Centers for Medicare & Medicaid Services or any government or government agency relating to the Debtors or Receivership Entities.

**Intercompany and Related Party Transactions**

20. Debtors', Petersen Non-Debtor Entities', and Receivership Entities' intercompany debt and/or obligations (including intercompany notes and guarantees), and the calculations thereof.
21. Relationship and agreements between Debtors, Petersen Non-Debtor Entities, Receivership Entities, Insiders and/or Affiliates.
22. Transactions between Debtors, Petersen Non-Debtor Entities, Receivership Entities, Insiders and/or Affiliates.
23. Payments, disbursements and/or transfer of monies and/or assets between Debtors, Petersen Non-Debtor Entities, Receivership Entities, Insiders and/or Affiliates.
24. Calculation and allocation of costs and expenses between Debtors, Petersen Non-Debtor Entities, Receivership Entities, Insiders and/or Affiliates.
25. Distributions and/or payments to Debtors', Petersen Non-Debtor Entities', Receivership Entities' and/or Affiliates' owner(s), shareholders, officers, directors, members, partners, Insiders, or the like.
26. Intercompany receivables and payables between Debtors, Petersen Non-Debtor Entities Receivership Entities, Insiders, and/or Affiliates.

**Cyberattack**

27. The ransomware attack related to the Debtors and Receivership Entities, and Debtors' and Receivership Entities' response to same.

28. The cyberattack attack related to the Debtors and Receivership Entities, and Debtors' and Receivership Entities' response to same.