

**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 Nos. 753, 754 & 813**

**SECOND CERTIFICATION OF COUNSEL REGARDING  
OMNIBUS ORDER APPROVING THE FIRST INTERIM FEE  
APPLICATIONS OF THE COMMITTEE'S PROFESSIONALS**

The undersigned hereby certifies as follows:

1. On August 14, 2024, Province, LLC (“**Province**”), financial advisor to the Official Committee of Unsecured Creditors in the above-captioned cases (the “**Committee**”), caused to be filed the *First Interim Fee Application for Compensation and Reimbursement of Expenses of Province, LLC, as Financial Advisor to the Official Committee of Unsecured Creditors for the Period from April 11, 2024 Through June 30, 2024* [Docket No. 753] (the “**Province Application**”).

2. On August 14, 2024, Greenberg Traurig, LLP (“**Greenberg Traurig**,” and together with Province, the “**Committee Professionals**”), counsel for the Committee, filed the *First Interim Fee Application of Greenberg Traurig, LLP, Counsel to the Official Committee of Unsecured Creditors of SC Healthcare Holding, LLC et al. for Allowance of Compensation for Services Rendered and Reimbursement of Expenses for the Period April 10, 2024 through June 30, 2024*

<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).



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[Docket No. 754] (the “**GT Application**,” and together with the Province Application, the “**Applications**”).

3. Objections to the Applications, if any, were due on or before September 4, 2024 at 4:00 p.m. (ET) (the “**Objection Deadline**”). Prior to the Objection Deadline, the Office of the United States Trustee for the District of Delaware (the “**U.S. Trustee**”) provided informal comments to each Application.

4. On September 11, 2024, Greenberg Traurig filed a certification of counsel [Docket No. 813], which included a proposed form of order, attached thereto as Exhibit A (the “**Proposed Order**”), reflecting certain reductions in fees or expenses agreed to by each Committee Professional to resolve the U.S. Trustee’s comments.

5. On September 19, 2024, the Court raised certain questions with respect to the GT Application. Attached hereto as **Exhibit A** is a revised Proposed Order reflecting additional voluntary fee reductions agreed to by Greenberg Traurig (the “**Revised Proposed Order**”) in response thereto. A redline comparing the Revised Proposed Order to the Proposed Order, and schedule thereto, is attached hereto as **Exhibit B**.

*[Remainder of page intentionally left blank.]*

**WHEREFORE**, the Committee Professionals respectfully request that the Court enter the Revised Proposed Order at its earliest convenience without further notice or a hearing. Counsel is available at the request of the Court.

Dated: September 20, 2024  
Wilmington, Delaware

Respectfully submitted,

**GREENBERG TRAURIG, LLP**

/s/ Dennis A. Meloro

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**COUNSEL FOR THE OFFICIAL  
COMMITTEE OF UNSECURED CREDITORS**

**Exhibit A**

(Revised Proposed Order)

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

In re:

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Debtors.<sup>1</sup>

Chapter 11

Case No. 24-10443 (TMH)

(Jointly Administered)

**Ref Dkt. Nos. 753 and 754**

**OMNIBUS ORDER APPROVING FIRST INTERIM  
FEE APPLICATIONS OF THE COMMITTEE'S PROFESSIONALS**

Upon consideration of the first interim fee applications (together, the “**Applications**”) of Greenberg Traurig, LLP and Province, LLC (together, the “**Committee Professionals**”), each retained by the Official Committee of Unsecured Creditors in the above-captioned cases of the debtors and the debtors in possession (collectively, the “**Debtors**”), for allowance of compensation and reimbursement of expenses on an interim basis; and the United States Bankruptcy Court for the District of Delaware (this “**Court**”) having determined that proper and adequate notice has been given and that no other or further notice is necessary; and any objections to the Applications having been overruled or resolved; and after a hearing being held; and after due deliberation thereon; and good and sufficient cause appearing therefore, it is hereby

**ORDERED, ADJUDGED AND DECREED THAT:**

1. Each Application is APPROVED on an interim basis with respect to the amounts set forth on **Schedule 1** to this Order.

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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).

2. Each Committee Professional is granted interim allowance of compensation and reimbursement of expenses in the amounts set forth on **Schedule 1** to this Order.

3. The Debtors are authorized and directed to remit payment to the Committee Professionals in the amounts set forth on set forth on **Schedule 1** to this Order, less all amounts previously paid on account of such fees and expenses.

4. This Order shall be deemed a separate order for each Committee Professional and the appeal of any order with respect to any Committee Professional shall have no effect on the authorized fees and expenses of the other Committee Professional.

5. This Court shall retain jurisdiction with respect to all matters relating to the interpretation or implementation of this Order.

**Schedule 1**

## SC HEALTHCARE HOLDINGS, LLC

Case No. 24-10443 (TMH)

## Chart of Interim Fee Applications

<b>Professional &amp; Role in Case</b>	<b>Interim Compensation Period &amp; Interim Fee Application</b>	<b>Interim Fees Requested</b>	<b>Voluntary Fee Reduction</b>	<b>Interim Expenses Requested</b>	<b>Voluntary Expense Reduction</b>	<b>Interim Fees Approved</b>	<b>Interim Expenses Approved</b>
Province, LLC, financial advisor to the Committee	4.11.24 through 6.30.24, [Docket No. 753]	\$1,083,104.00	N/A	\$5,992.80	\$1,000	\$1,083,104.00	\$4,992.80
Greenberg Traurig, LLP, counsel to the Committee	4.10.24 through 6.30.24, [Docket No. 754]	\$1,831,658.50	\$5,126.88	\$52,013.91	N/A	\$1,826,531.62	\$52,013.91

**Exhibit B**

(Revised Proposed Order Redline)



**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 Dkt. Nos. 753 and 754**

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FEE APPLICATIONS OF THE COMMITTEE'S PROFESSIONALS**

Upon consideration of the first interim fee applications (together, the “**Applications**”) of Greenberg Traurig, LLP and Province, LLC (together, the “**Committee Professionals**”), each retained by the Official Committee of Unsecured Creditors in the above-captioned cases of the debtors and the debtors in possession (collectively, the “**Debtors**”), for allowance of compensation and reimbursement of expenses on an interim basis; and the United States Bankruptcy Court for the District of Delaware (this “**Court**”) having determined that proper and adequate notice has been given and that no other or further notice is necessary; and any objections to the Applications having been overruled or resolved; and after a hearing being held; and after due deliberation thereon; and good and sufficient cause appearing therefore, it is hereby

**ORDERED, ADJUDGED AND DECREED THAT:**

1. Each Application is APPROVED on an interim basis with respect to the amounts set forth on **Schedule 1** to this Order.

<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).

2. Each Committee Professional is granted interim allowance of compensation and reimbursement of expenses in the amounts set forth on Schedule 1 to this Order.

3. The Debtors are authorized and directed to remit payment to the Committee Professionals in the amounts set forth on set forth on Schedule 1 to this Order, less all amounts previously paid on account of such fees and expenses.

4. This Order shall be deemed a separate order for each Committee Professional and the appeal of any order with respect to any Committee Professional shall have no effect on the authorized fees and expenses of the other Committee Professional.

5. This Court shall retain jurisdiction with respect to all matters relating to the interpretation or implementation of this Order.

**Schedule 1**

SC HEALTHCARE HOLDINGS, LLC  
Case No. 24-10443 (TMH)  
Chart of Interim Fee Applications

<b>Professional &amp; Role in Case</b>	<b>Interim Compensation Period &amp; Interim Fee Application</b>	<b>Interim Fees Requested</b>	<b>Voluntary Fee Reduction</b>	<b>Interim Expenses Requested</b>	<b>Voluntary Expense Reduction</b>	<b>Interim Fees Approved</b>	<b>Interim Expenses Approved</b>
Province, LLC, financial advisor to the Committee	4.11.24 through 6.30.24, [Docket No. 753]	\$1,083,104.00	N/A	\$5,992.80	\$1,000	\$1,083,104.00	\$4,992.80
Greenberg Traurig, LLP, counsel to the Committee	4.10.24 through 6.30.24, [Docket No. 754]	\$1,831,658.50	<del>\$35,712,063.88</del>	\$52,013.91	N/A	<del>\$1,827,953.16</del>	\$52,013.91

<b>Summary report:</b>	
<b>Litera Compare for Word 11.9.1.1 Document comparison done on 9/20/2024 9:23:15 AM</b>	
<b>Style name:</b> GT-3 - Headers and footers included, no moves, no comments	
<b>Intelligent Table Comparison:</b> Active	
<b>Original DMS:</b> iw://dmsamericas.gtlaw.com/ACTIVE/702187137/1	
<b>Modified DMS:</b> iw://dmsamericas.gtlaw.com/ACTIVE/702187137/2	
<b>Changes:</b>	
<u>Add</u>	10
<del>Delete</del>	8
<del>Move From</del>	0
<u>Move To</u>	0
<u>Table Insert</u>	0
<del>Table Delete</del>	0
<u>Table moves to</u>	0
<del>Table moves from</del>	0
Embedded Graphics (Visio, ChemDraw, Images etc.)	0
Embedded Excel	0
Format changes	0
<b>Total Changes:</b>	<b>18</b>