

**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. I.D. 761 & 762

**CERTIFICATION OF COUNSEL REGARDING OMNIBUS
ORDER APPROVING FIRST INTERIM FEE APPLICATIONS
FOR PATIENT CARE OMBUDSMAN PROFESSIONALS**

I, Cheryl A. Santaniello, hereby certify as follows:

1. The undersigned is counsel to Suzanne Koenig, the patient care ombudsman (the "Ombudsman"), in the above-captioned Chapter 11 Cases.

2. On August 14, 2024, Porzio, Bromberg & Newman, P.C. ("Porzio") filed and served the *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. 751] (the "Porzio Fee Application"), seeking allowance of interim compensation in the amount of \$137,337.50 and reimbursement of expenses in the amount of \$879.72 pursuant to *Order Establishing Procedures for Interim Compensation and Reimbursement of Professionals* [D.I. 235] (the "Interim Compensation Order").

3. Also on August 14, 2024, SAK Management Services, LLC d/b/a SAK Healthcare ("SAK", and collectively with Porzio, the "Professionals") filed and served the *First Interim Fee*

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.



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] (the "SAK Fee Application", and collectively with the Porzio Fee Application, the "Fee Applications"), seeking allowance of interim compensation in the amount of \$278,525.00 and reimbursement of expenses in the amount of \$19,645.52 pursuant to the Interim Compensation Order.

4. Pursuant to the Court's request, SAK has agreed to reduce the requested amount of interim fees in the SAK Fee Application by 2.20 total hours, for a combined fee reduction of \$895.00.

5. The undersigned is also herewith submitting the Omnibus Order Approving First Interim Fee Applications for the Patient Care Ombudsman Professionals (the "Proposed Fee Omnibus Order"), which reflects the reduction of \$895.00 for the SAK Fee Application.

6. Accordingly, the undersigned respectfully request that the Court enter the Proposed Omnibus Fee Order attached hereto as **Exhibit A** at the Court's earliest convenience.

Respectfully submitted,

Dated: September 23, 2024

/s/ Cheryl A. Santaniello

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

Counsel for the Patient Care Ombudsman

EXHIBIT A

Proposed Order

**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

**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:

1. The Fee Applications are GRANTED as set forth on the attached **Exhibit A**.

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.

2. The applicants in the Fee Applications, respectively, are allowed (i) compensation for services rendered during the Compensation Period set forth therein, and (ii) reimbursement for actual and necessary expenses incurred during the Compensation Period set forth therein, in the respective amounts set forth on the attached **Exhibit A**, including any and all amounts held back.

3. To the extent not already paid pursuant to the Interim Compensation Order, as applicable, the Debtors are authorized to pay each of the applicants in the Fee Applications 100% of the fees and 100% of the expenses listed on the attached **Exhibit A** under "Net Total Payment Outstanding," for services rendered and expenses incurred during the Compensation Period; provided, however, that all fees and expenses paid as authorized herein remain subject to final allowance by the Court.

EXHIBIT A

Interim Fee Application Chart

Professional	Role	Retention Date	Compensation Period	Fees Requested	Reduced Fees	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	\$0.00	\$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	\$895.00	\$19,645.52	\$297,275.52	\$222,820.00	\$19,645.52	\$54,810.00