

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:

SC HEALTHCARE HOLDING, LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 24-10443 (TMH)

(Jointly Administered)

Ref. D.I. 1365 and 1366

**RESERVATION OF RIGHTS OF MARK B. PETERSEN WITH RESPECT  
TO (I) DEBTORS' COMBINED DISCLOSURE STATEMENT AND PLAN OF  
LIQUIDATION, AND (II) MOTION FOR ENTRY OF AN ORDER (I) APPROVING  
THE COMBINED PLAN AND DISCLOSURE STATEMENT ON AN INTERIM  
BASIS FOR SOLICITATION PURPOSES ONLY; (II) ESTABLISHING THE  
DEADLINE FOR ADMINISTRATIVE EXPENSE CLAIMS; (III) ESTABLISHING  
SOLICITATION AND VOTING PROCEDURES; (IV) APPROVING THE FORM  
OF BALLOTS AND SOLICITATION MATERIALS; (V) ESTABLISHING THE  
VOTING RECORD DATE; (VI) FIXING THE DATE, TIME, AND PLACE FOR  
THE COMBINED HEARING AND THE DEADLINES FOR FILING  
OBJECTIONS THERETO; AND (VII) GRANTING RELATED RELIEF**

Mark B. Petersen ("Petersen"), by and through his undersigned counsel, respectfully submits this as his reservation of rights in connection with the Debtors' Combined Disclosure Statement and Plan of Liquidation [D.I. 1365] (for purposes of this reservation of rights, the "Disclosure Statement") and the captioned motion [D.I. 1366] (the "Solicitation Motion"). In support, Petersen respectfully represents as follows:

As noted on the agenda notice filed by Debtors on April 15, 2025 [D.I. 1393], Petersen has provided comments to the Debtors with respect to the Debtors' Disclosure Statement and did so in

<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, for which the Debtors have requested joint administration, 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' proposed claims and noticing agent at [ww.kccllc.net/Petersen](http://ww.kccllc.net/Petersen).



advance of the pre-mediation call the parties participated in on April 10, 2025, with former Bankruptcy Judge Christopher Sontchi.

Both the United States Trustee [D.I. 1389] and the Creditors Committee [D.I. 1392] have filed objections to the Disclosure Statement and Solicitation Motion. Among other asserted disclosure issues that it submits must be addressed in the Disclosure Statement, the Committee asserts that the estates have claims against Petersen that also must be addressed. Petersen submits that any such claims lack merit and Petersen fully reserves all rights with respect thereto.

In addition, in that no revised Disclosure Statement has yet been circulated, and with a hearing set for April 17<sup>th</sup> on the Disclosure Statement and Solicitation Motion, Petersen also fully reserves the right to review, provide additional comment to, and object to any proposed revised Disclosure Statement and to the Solicitation Motion prior to or at the April 17<sup>th</sup> hearing.

Petersen also fully reserves the right to object to confirmation of the Debtors' plan of liquidation in accordance with any confirmation schedule set by the Court in connection with the Solicitation Motion.

Dated: April 16, 2025

**SAUL EWING LLP**

/s/ Paige N. Topper

John D. Demmy (DE Bar No. 2802)

Paige N. Topper (DE Bar No. 6470)

1201 N. Market Street, Suite 2300

Wilmington, DE 19899

Telephone: (302) 421-6800

Email: john.demmy@saul.com

paige.topper@saul.com

-and-

Barry A. Chatz (*pro hac vice* forthcoming)

161 North Clark Street, Suite 4200\

Chicago, IL 60601

Telephone: (312) 876-7100

Email: barry.chatz@saul.com

*Counsel for Mark B. Petersen*

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**CERTIFICATE OF SERVICE**

I, Paige N. Topper, hereby certify that on April 16, 2025, I caused a copy of the *Reservation of Rights of Mark B. Petersen*, to be filed electronically with the Court and served through the Court's CM/ECF system upon all registered electronic filers appearing in these cases. Additionally, I served a courtesy copy of the motion via electronic mail on the parties listed on the attached service list.

Dated: April 16, 2025

**SAUL EWING LLP**

/s/ Paige N. Topper

Paige N. Topper (DE Bar No. 6470)  
1201 N. Market Street, Suite 2300  
Wilmington, DE 19801  
(302) 421-6800

### Service List

Daniel J. McGuire, Esquire  
Gregory M. Gartland, Esquire  
Winston & Strawn LLP  
35 W. Wacker Drive  
Chicago, IL 60601  
dmcguire@winston.com  
ggartland@winston.com

Carrie V. Hardman, Esquire  
Winston & Strawn LLP  
200 Park Avenue  
New York, NY 10166  
chardman@winston.com

Andrew L. Magaziner, Esquire  
Shella Borovinskaya, Esquire  
Carol E. Cox, Esquire  
Young Conaway Stargatt & Taylor, LLP  
Rodney Square  
1000 North King Street  
Wilmington, DE 19801  
amagaziner@ycst.com  
sborovinskaya@ycst.com  
ccox@ycst.com

Dennis A. Meloro, Esquire  
Anthony W. Clark, Esquire  
Greenberg Traurig, LLP  
222 Delaware Avenue, Suite 1600  
Wilmington, DE 19801  
melorod@gtlaw.com  
anthony.clark@gtlaw.com

Nancy A. Peterman, Esquire  
Danny Duerdoth, Esquire  
Greenberg Traurig, LLP  
77 West Wacker Dr., Suite 3100  
Chicago, IL 60601  
petermann@gtlaw.com  
duerdothd@gtlaw.com

Shari L. Heyen, Esquire  
Greenberg Traurig, LLP  
1000 Louisiana Street  
Suite 6700  
Houston, TX 77002  
shari.heyen@gtlaw.com

Linda Richenderfer, Esquire  
Office of the U.S. Trustee  
J. Caleb Boggs Federal Building  
844 N. King Street, Room 2207, Lockbox 35  
Wilmington, DE 19801  
linda.richenderfer@usdoj.gov

David E Lemke, Esquire  
Tyler Layne, Esquire  
Holland & Knight LLP  
Nashville City Center  
511 Union Street, Suite 2700  
Nashville, TN 37219  
Tyler.Layne@hklaw.com  
David.Lemke@hklaw.com

Richard S Cobb, Esquire  
Joshua B Brooks, Esquire  
Adam Landis, Esquire  
Howard W. Robertson IV, Esquire  
Landis Rath & Cobb LLP  
919 Market St Ste 1800  
Wilmington, DE 19801  
cobb@lrclaw.com  
brooks@lrclaw.com  
landis@lrclaw.com  
robertson@lrclaw.com