

**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)

Obj. Deadline: May 28, 2025 at 4:00 p.m.

**THIRTEENTH MONTHLY FEE APPLICATION OF PORZIO, BROMBERG &  
NEWMAN, P.C. AS COUNSEL FOR THE PATIENT CARE OMBUDSMAN, FOR  
ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES  
FOR THE PERIOD OF APRIL 1, 2025 THROUGH APRIL 30, 2025**

Name of Applicant:

Porzio, Bromberg & Newman, P.C.

Authorized to Provide  
Professional Services to:

Suzanne Koenig, Patient Care Ombudsman

Date of Retention:

May 24, 2024 *nunc pro tunc* to April 18, 2024

Period for which compensation  
and reimbursement is sought:

April 1, 2025 through April 30, 2025

Amount of Compensation sought as  
actual, reasonable and necessary  
legal services rendered:

\$30,897.50

Amount of Expense Reimbursement  
sought as actual, reasonable and  
necessary:

\$223.24

This is a(n): X monthly      interim      final application

<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).



## Prior Applications:

Dated Filed	Period Covered	Requested		Approved	
		Fees	Expenses	Fees	Expenses
6/6/2024	April 18, 2024 through April 30, 2024	\$29,313.50	\$50.00	\$29,313.50	\$50.00
7/11/2024	May 1, 2024 through May 31, 2024	\$58,328.50	\$502.00	\$58,328.50	\$502.00
8/9/2024	June 1, 2024 through June 30, 2024	\$49,695.50	\$327.72	\$49,695.50	\$327.72
9/16/2024	July 1, 2024 through July 31, 2024	\$38,666.00	\$2,392.49	\$30,932.80	\$2,392.49
10/28/2024	August 1, 2024 through August 31, 2024	\$46,143.50	\$190.76	\$36,914.80	\$190.76
10/31/2024	September 1, 2024 through September 30, 2024	\$24,960.50	\$1,554.51	\$19,968.40	\$1,554.51
12/20/2024	October 1, 2024 through October 31, 2024	\$55,444.00	\$19.70	\$44,355.20	\$19.70
12/27/2024	November 1, 2024 through November 30, 2024	\$44,972.00	\$1,381.64	\$35,977.60	\$1,381.64
2/11/2025	December 1, 2024 through December 31, 2024	\$49,924.00	\$55.12	\$39,939.20	\$55.12
3/17/2025	January 1, 2025 through January 31, 2025	\$26,504.00	\$1,129.26	\$21,203.20	\$1,129.26
4/11/2025	February 1, 2025 through February 28, 2025	\$50,382.00	\$192.84	\$40,305.60	\$192.84
5/14/2025	March 1, 2025 through March 31, 2025	\$14,647.50	\$1,877.88	N/A	N/A

**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)

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Obj. Deadline: May 28, 2025 at 4:00 p.m.

**THIRTEENTH MONTHLY FEE APPLICATION OF PORZIO, BROMBERG &  
NEWMAN, P.C. AS COUNSEL FOR THE PATIENT CARE OMBUDSMAN,  
FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF  
EXPENSES FOR THE PERIOD OF APRIL 1, 2025 THROUGH APRIL 30, 2025**

Porzio, Bromberg & Newman, P.C. (“Porzio”), counsel to Suzanne Koenig, the patient care ombudsman (the “Ombudsman”) appointed in the above above-captioned chapter 11 cases (the “Chapter 11 Cases”) of SC Healthcare Holding, LLC, *et al.* (collectively, the “Debtors”), hereby submits its thirteenth monthly fee application (the “Application”) for entry of an order pursuant to sections 330 and 331 of title 11 of the United States Code, 11 U.S.C. §§101 et seq., as amended (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rule 2016-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Bankruptcy Rules”), the United States Trustee’s Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses filed under 11 U.S.C. § 330, effective January 30, 1996 (the “U.S. Trustee Guidelines”), and the Interim Compensation Order (defined below), for allowance of compensation for services rendered in the amount of \$30,897.50 and reimbursement of expenses

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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).

in the amount \$223.24 for the period from April 1, 2025 through April 30, 2025 (the “Compensation Period”), and in support thereof, respectfully represents as follows:

### **JURISDICTION AND VENUE**

1. This Court has jurisdiction over this Application pursuant to 28 U.S.C. §1334. This is a core proceeding pursuant to 28 U.S.C. §157(b)(2)(A) and (B).

2. Venue of this proceeding and this Application is proper in this District pursuant to 28 U.S.C. §§1408 and 1409.

3. The statutory predicates for the relief sought herein are sections 330 and 331 of the Bankruptcy Code, Bankruptcy Rule 2016 and Local Bankruptcy Rule 2016-2.

### **BACKGROUND**

4. On March 20, 2024, (the “Petition Date”), the Debtors each commenced the above-captioned Chapter 11 Cases by filing voluntary petitions for relief under chapter 11 of the Bankruptcy Code.

5. The Debtors, with the exception of some inactive entities, are authorized to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee or examiner has been appointed in the Chapter 11 Cases.

6. On April 10, 2024, the U.S. Trustee filed the *Concurred in Application Regarding Order Pursuant to 11 U.S.C. § 333 and Fed. R. Bankr. P. 2007.2 Directing the Appointment of a Patient Care Ombudsman* [D.I. 136] (the “Ombudsman Application”).

7. On April 10, 2024, the Court entered the *Order Pursuant to Pursuant to 11 U.S.C. § 333 and Fed. R. Bankr. P. 2007.2 Directing the Appointment of a Patient Care Ombudsman* [D.I. 137] (the “Ombudsman Order”).

8. On April 16, 2024, the U.S. Trustee filed the *Notice of Appointment of Patient Care Ombudsman Under 11 U.S.C. § 333* [D.I. 160] (the “Ombudsman Appointment”), appointing Suzanne Koenig as the Ombudsman.

9. On May 8, 2024, the Ombudsman filed an application seeking the retention of Porzio as counsel for the Ombudsman *nunc pro tunc* to April 18, 2024 [D.I. 274] (the “Porzio Retention Application”). A Certification of No Objection regarding the Porzio Retention Application was filed on May 23, 2024 [D.I. 350]. The Order approving the Porzio Retention Application was entered on May 24, 2024 [D.I. 364].

10. On April 9, 2024, the Debtors filed the *Debtors’ Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [D.I. 133] (the “Interim Compensation Motion”). The Order approving the Interim Compensation Motion was entered on April 23, 2024 [D.I. 235] (the “Interim Compensation Order”), which sets forth the procedures for interim compensation and reimbursement of expenses in these Chapter 11 Cases. Specifically, the Interim Compensation Order provides, among other things, that a Professional may file and serve a monthly fee application (the “Monthly Fee Application”) on or after the tenth (10<sup>th</sup>) day of each month following the month for which compensation is sought. Provided that there are no objections to the Monthly Fee Application filed within fourteen (14) days after the service of a Monthly Fee Application, the Professional may file a certificate of no objection with the Court, after which the Debtors are authorized to pay such Professional eighty percent (80%) of the fees and one-hundred percent (100%) of the expenses requested in such Monthly Fee Application. If an objection is filed to the Monthly Fee Application, then the Debtors are authorized to pay 80% of the fees and 100% of the expenses not subject to objection.

### **RELIEF REQUESTED**

11. Pursuant to the Interim Compensation Order and Bankruptcy Code section 331, Porzio is seeking compensation in the amount of \$24,718.00 which is equal to 80% of the \$30,897.50 in fees for professional services rendered by Porzio during the Compensation Period. This amount is derived solely from the applicable hourly billing rates of Porzio's personnel who rendered such services to the Ombudsman. In addition, Porzio is seeking reimbursement of expenses incurred during the Compensation Period in the amount of \$223.24.

#### **A. Compensation Requested**

12. Attached as **Exhibit A** is a full and detailed statement describing the services rendered by each professional and paraprofessional at Porzio during the Compensation Period, along with the number of hours for each individual and the total compensation sought for each category. Porzio contends that this detailed itemization complies with Local Bankruptcy Rule 2016-2(d).

#### **B. Expense Reimbursement**

13. Porzio incurred \$223.24 of out-of-pocket expenses during the Compensation Period. A chart detailing and breaking out the specific disbursements is attached hereto as **Exhibit B**.

### **VALUATION OF SERVICES**

14. Attorneys and paraprofessionals of Porzio have expended a total of 45.70 hours in connection with this matter during the Compensation Period. The Ombudsman's professionals have monitored and continue to monitor the bankruptcy cases and information relating to resident and patient records for matters pertaining to resident and patient interests as further reflected in the detailed time entries attached hereto as **Exhibit A**.

15. The amount of time spent by each of the professionals providing services to the Ombudsman for the Compensation Period is set forth in **Exhibit A** hereto. The rates are Porzio's normal hourly rates of compensation for work of this character. The reasonable value of the services rendered by Porzio for the Compensation Period as counsel for the Ombudsman in these cases is \$30,897.50.

16. In accordance with the factors enumerated in Bankruptcy Code section 330, Porzio contends that the amount requested is fair and reasonable given (i) the complexity of these cases, (ii) the time expended, (iii) the nature and extent of the services rendered, (iv) the value of such services and (v) the costs of comparable services other than in a case under this title. Porzio's fees are reasonable and appropriate under the applicable legal standard, and should therefore be allowed.

17. Porzio believes that the time entries included in **Exhibit A** and the expense breakdown set forth in **Exhibit B** are in compliance with the requirements of Local Bankruptcy Rule 2016-2.

#### **NO PRIOR REQUEST**

18. No prior request for the relief sought in the Application has been made to this or any other court.

#### **CERTIFICATE OF COMPLIANCE AND WAIVER**

19. The undersigned representative of Porzio certifies that she has reviewed the requirements of Local Bankruptcy Rule 2016-2 and that the Application substantially complies with that Local Bankruptcy Rule. To the extent that the Application does not comply in all respects with the requirements of Local Bankruptcy Rule 2016-2, Porzio believes that such deviations are not material and respectfully requests that any such requirements be waived.

WHEREFORE, Porzio hereby requests pursuant to the procedures allowed in the Interim Compensation Order: (i) allowance of compensation for necessary and valuable professional services rendered to the Ombudsman in the amount of \$30,897.50 for the period from April 1, 2025 through April 30, 2025; (ii) payment in the total amount of \$24,941.24 (representing 80% of the total fees (\$24,718.00) billed and 100% of the expenses (\$223.24) incurred during the Compensation Period); and (iii) such other relief as this Court deems just and proper.

Date: May 14, 2025

/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](mailto: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  
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Email: [cpmazza@pbnlaw.com](mailto:cpmazza@pbnlaw.com)

*Counsel for the Patient Care Ombudsman*

# EXHIBIT A

**Timekeeper Summary – April 1, 2025 – April 30, 2025**

<b>Timekeeper</b>	<b>Position</b>	<b>Rate</b>	<b>Hours</b>	<b>Amount</b>
Robert M. Schechter	Principal in Bankruptcy Department since 2014, Member of NJ Bar since 2005	\$925.00	12.90	\$11,932.50
Cheryl A. Santaniello	Principal in Bankruptcy Department since 2014, Member of DE Bar since 2007	\$875.00	1.50	\$1,312.50
Kimberly N. Pageau	Counsel in Bankruptcy Department since 2025; Member of NY Bar 2017	\$750.00	4.20	\$3,150.00
Michael F. Medved	Associate in Bankruptcy Department since 2024, Member of NY Bar 202	\$620.00	13.30	\$8,246.00
Dean M. Oswald	Associate in Bankruptcy Department since 2021, Member of NY Bar 2022	\$560.00	2.90	\$1,624.00
Jessica M. O'Connor	Paralegal in Bankruptcy Department since 2020	\$425.00	10.90	\$4,632.50
<b>Totals:</b>			<b>45.70</b>	<b>\$30,897.50</b>
<b>Blended Rate:</b>			<b>\$676</b>	

**Compensation By Category – April 1, 2025 – April 30, 2025**

<b>Project Category</b>		
Asset Analysis and Recovery	0.50	\$437.50
Business Operations	0.20	\$185.00
Case Administration	5.30	\$3,735.50
Claims Administration and Objections	0.10	\$92.50
Fee/Employment Applications	10.40	\$5,092.50
Financing	0.30	\$262.50
Plan and Disclosure Statement	20.80	\$15,802.50
Reporting	8.10	\$5,289.50
<b>Totals</b>	<b>45.70</b>	<b>\$30,897.50</b>



100 SOUTHGATE PARKWAY, PO BOX 1997  
MORRISTOWN, NJ 07962-1997  
TEL (973) 538-4006  
FAX (973) 538-5146  
TAX ID: 22-2005150

May 14, 2025

Suzanne Koenig  
300 Saunders Road  
Riverwoods, IL 60015

Invoice # 3334128

Re: *SC Healthcare Holding, LLC, et al.*  
Our Matter # 026646.099904  
Billing Attorney: Robert M. Schechter

**STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 04/30/25**

Professional Services	30,897.50
Disbursements	223.24
<b>TOTAL CURRENT INVOICE</b>	<b>\$31,120.74</b>
Previous Balance Due	31,902.58
<b>TOTAL BALANCE DUE</b>	<b>\$63,023.32</b>

Please make check payable to Porzio, Bromberg & Newman, P.C.

**REMITTANCE PAGE**



100 SOUTHGATE PARKWAY, PO BOX 1997  
MORRISTOWN, NJ 07962-1997  
TEL (973) 538-4006  
FAX (973) 538-5146  
TAX ID: 22-2005150

May 14, 2025

Suzanne Koenig  
300 Saunders Road  
Riverwoods, IL 60015

Invoice # 3334128

Re: *SC Healthcare Holding, LLC, et al.*  
Our Matter # 026646.099904  
Billing Attorney: Robert M. Schechter

#### AGGREGATE TIME SUMMARY BY TASK CODE

<u>Task Code</u>	<u>Task Description</u>	<u>Total Hours</u>	<u>Total Amount</u>
ASSTANAL	Asset Analysis and Recovery	0.50	437.50
BUSOPS	Business Operations	0.20	185.00
CASEADMN	Case Administration	5.30	3,735.50
CLAIMS	Claims Administration and Objections	0.10	92.50
FEEAPPS	Fee/Employment Applications	10.40	5,092.50
FINANCE	Financing	0.30	262.50
PLANDSCL	Plan and Disclosure Statement	20.80	15,802.50
REPORTG	Reporting	8.10	5,289.50
<b>Total</b>		<b><u>45.70</u></b>	<b><u>30,897.50</u></b>

#### AGGREGATE TIME SUMMARY BY TASK CODE BY TIMEKEEPER

<u>Task Code</u>	<u>Timekeeper</u>	<u>Title</u>	<u>Total Hours</u>	<u>Hourly Rate</u>	<u>Total</u>
<b>Asset Analysis and Recovery</b>					
ASSTANAL	Santaniello, C. A.	Principal	0.50	875.00	437.50
<b>Asset Analysis and Recovery</b>					
<b>Total</b>			<b>0.50</b>		<b>437.50</b>
<b>Business Operations</b>					
BUSOPS	Schechter, R. M.	Principal	0.20	925.00	185.00
<b>Business Operations</b>					
<b>Total</b>			<b>0.20</b>		<b>185.00</b>

#### Case Administration

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<u>Task Code</u>	<u>Timekeeper</u>	<u>Title</u>	<u>Total Hours</u>	<u>Hourly Rate</u>	<u>Total</u>
CASEADMN	Schechter, R. M.	Principal	2.30	925.00	2,127.50
	OConnor, J. M.	Paralegal - 2 - Senior Level	0.80	425.00	340.00
	Oswald, D. M.	Associate 2	1.60	560.00	896.00
	Medved, M. F.	Associate 1	0.60	620.00	372.00
<b>Case Administration</b>					
<b>Total</b>			<b>5.30</b>		<b>3,735.50</b>
<b>Claims Administration and Objections</b>					
CLAIMS	Schechter, R. M.	Principal	0.10	925.00	92.50
<b>Claims Administration and Objections</b>					
<b>Total</b>			<b>0.10</b>		<b>92.50</b>
<b>Fee/Employment Applications</b>					
FEEAPPS	Schechter, R. M.	Principal	0.70	925.00	647.50
	OConnor, J. M.	Paralegal - 2 - Senior Level	8.70	425.00	3,697.50
	Santaniello, C. A.	Principal	0.50	875.00	437.50
	Medved, M. F.	Associate 1	0.50	620.00	310.00
<b>Fee/Employment Applications</b>					
<b>Total</b>			<b>10.40</b>		<b>5,092.50</b>
<b>Financing</b>					
FINANCE	Santaniello, C. A.	Principal	0.30	875.00	262.50
<b>Financing</b>					
<b>Total</b>			<b>0.30</b>		<b>262.50</b>
<b>Plan and Disclosure Statement</b>					
PLANDSCL	Schechter, R. M.	Principal	7.70	925.00	7,122.50
	OConnor, J. M.	Paralegal - 2 - Senior Level	0.20	425.00	85.00
	Santaniello, C. A.	Principal	0.20	875.00	175.00
	Medved, M. F.	Associate 1	8.50	620.00	5,270.00
	Pageau, K. N.	Counsel	4.20	750.00	3,150.00
<b>Plan and Disclosure Statement</b>					
<b>Total</b>			<b>20.80</b>		<b>15,802.50</b>
<b>Reporting</b>					
REPORTG	Schechter, R. M.	Principal	1.90	925.00	1,757.50

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 Invoice #3334128

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<u>Task Code</u>	<u>Timekeeper</u>	<u>Title</u>	<u>Total Hours</u>	<u>Hourly Rate</u>	<u>Total</u>
	OConnor, J. M.	Paralegal - 2 - Senior Level	1.20	425.00	510.00
	Oswald, D. M.	Associate 2	1.30	560.00	728.00
	Medved, M. F.	Associate 1	3.70	620.00	2,294.00
<b>Reporting Total</b>			<b>8.10</b>		<b>5,289.50</b>
<b>Total</b>			<b>45.70</b>		<b>30,897.50</b>

#### AGGREGATE TIME SUMMARY PAGE BY INDIVIDUAL

0694	Schechter, R. M.	Principal	12.90	925.00	11,932.50
2624	OConnor, J. M.	Paralegal - 2 - Senior Level	10.90	425.00	4,632.50
2625	Santaniello, C. A.	Principal	1.50	875.00	1,312.50
2658	Oswald, D. M.	Associate 2	2.90	560.00	1,624.00
2827	Medved, M. F.	Associate 1	13.30	620.00	8,246.00
2851	Pageau, K. N.	Counsel	4.20	750.00	3,150.00
	<b>Total</b>		<b>45.70</b>		<b>30,897.50</b>

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## Time Detail

<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
04/11/25	Review and approve Sixth PCO Report; exchange of emails with R. Schechter regarding foregoing; exchange of emails with J. O'Connor regarding filing and finalization.	CAS	ASSTANAL	0.50	437.50
<b>ASSTANAL Total</b>				<b>0.50</b>	<b>437.50</b>
04/03/25	Communications regarding inquiry on Sunset nursing home.	RMS	BUSOPS	0.20	185.00
<b>BUSOPS Total</b>				<b>0.20</b>	<b>185.00</b>
04/01/25	Analyze Debtors' combined plan and disclosure statement	DMO	CASEADMN	1.60	896.00
04/10/25	Continued research relating to discharge of PCO duties	RMS	CASEADMN	0.60	555.00
04/10/25	Review prior filings relating to and conduct research regarding clinical records and retention and disposal	RMS	CASEADMN	1.10	1,017.50
04/11/25	Review filings and information relating to upcoming hearing and communications regarding coverage of same	RMS	CASEADMN	0.30	277.50
04/14/25	Emails from R. Schechter and C. Santaniello regarding pro hac of K. Pageau	JMO	CASEADMN	0.20	85.00
04/14/25	Email from K. Pageau regarding pro hac	JMO	CASEADMN	0.10	42.50
04/14/25	Draft pro hac of K. Pageau	JMO	CASEADMN	0.10	42.50
04/14/25	Email to K. Pageau and C. Santaniello regarding draft pro hac of K. Pageau	JMO	CASEADMN	0.10	42.50
04/14/25	Email from C. Santaniello regarding filing pro hac of K. Pageau	JMO	CASEADMN	0.10	42.50
04/14/25	Prepare and file pro hac of K. Pageau	JMO	CASEADMN	0.20	85.00
04/16/25	Review notice of agenda relating to tomorrow's hearing	RMS	CASEADMN	0.10	92.50
04/18/25	Draft e-mail to client.	MFM	CASEADMN	0.60	372.00
04/22/25	Review mediation order.	RMS	CASEADMN	0.10	92.50
04/28/25	Correspond with PCO regarding case status	RMS	CASEADMN	0.10	92.50
<b>CASEADMN Total</b>				<b>5.30</b>	<b>3,735.50</b>
04/17/25	Communications regarding payment of	RMS	CLAIMS	0.10	92.50

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<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
	claims in connection with plan.				
			<b>CLAIMS Total</b>	<b>0.10</b>	<b>92.50</b>
04/02/25	Communications with D. Oswald regarding Fourth Interim Fee Applications and CNOs to January Monthly Fee Statements	JMO	FEEAPPS	0.40	170.00
04/02/25	Update deadline calendar regarding Fourth Interim Fee Applications of PBN & SAK	JMO	FEEAPPS	0.10	42.50
04/02/25	Draft CNO to January Monthly Fee Statement of PBN	JMO	FEEAPPS	0.10	42.50
04/02/25	Draft CNO to January Monthly Fee Statement of SAK	JMO	FEEAPPS	0.10	42.50
04/02/25	Emails to and from R. Schechter, C. Santaniello and D. Oswald regarding draft CNOs to January Monthly Fee Statements and filing of same	JMO	FEEAPPS	0.30	127.50
04/02/25	Prepare and file CNO to PBN January Monthly	JMO	FEEAPPS	0.20	85.00
04/02/25	Prepare and file CNO to SAK January Monthly	JMO	FEEAPPS	0.20	85.00
04/02/25	Communications regarding CNOs.	RMS	FEEAPPS	0.10	92.50
04/09/25	Email from D. Oswald regarding drafting February Monthly Fee Statements	JMO	FEEAPPS	0.10	42.50
04/09/25	Draft February Monthly Fee Statement of SAK	JMO	FEEAPPS	0.80	340.00
04/09/25	Email to D. Oswald and M. Medved regarding draft February Monthly Fee Statement of SAK	JMO	FEEAPPS	0.10	42.50
04/09/25	Email to D. Oswald regarding exhibit to February Monthly Fee Statement of PBN	JMO	FEEAPPS	0.10	42.50
04/10/25	Review and approve Porzio and SAK Management February Monthly Fee Statements; review and approve notices and COC of foregoing (.4); exchange of emails with J. O'Connor regarding foregoing (.1)	CAS	FEEAPPS	0.50	437.50
04/10/25	Draft February Monthly Fee Statement of PBN	JMO	FEEAPPS	0.80	340.00
04/10/25	Email to R. Schechter, C. Santaniello and M. Medved regarding draft February Monthly Fee Statements and filing of same	JMO	FEEAPPS	0.40	170.00

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<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
04/10/25	Review of invoices for filing.	MFM	FEEAPPS	0.50	310.00
04/11/25	Email from R. Schechter regarding filing February Monthly Fee Statements	JMO	FEEAPPS	0.10	42.50
04/11/25	Finalize February Monthly Fee Statement of PBN	JMO	FEEAPPS	0.30	127.50
04/11/25	Prepare and file February Monthly Fee Statement of PBN	JMO	FEEAPPS	0.20	85.00
04/11/25	Finalize February Monthly Fee Statement of SAK	JMO	FEEAPPS	0.30	127.50
04/11/25	Prepare and file February Monthly Fee Statement of SAK	JMO	FEEAPPS	0.20	85.00
04/11/25	Update objection deadline calendar regarding filed February Monthly Fee Statements of PBN & SAK	JMO	FEEAPPS	0.10	42.50
04/11/25	Review Porzio and SAK monthly feast statements and related documents for filing	RMS	FEEAPPS	0.30	277.50
04/14/25	Communications regarding Porzio and SAK fee statements	RMS	FEEAPPS	0.10	92.50
04/15/25	Draft March Monthly Fee Statement of PBN	JMO	FEEAPPS	0.70	297.50
04/15/25	Email to M. Medved regarding draft March Monthly Fee Statement of PBN	JMO	FEEAPPS	0.10	42.50
04/17/25	Communicate with PCO regarding fee applications.	RMS	FEEAPPS	0.10	92.50
04/23/25	Emails from and to M. Medved regarding March Monthly Fee Statement of SAK and Interim Fee Applications	JMO	FEEAPPS	0.40	170.00
04/28/25	Communication regarding Porzio and SAK March and April fee statements	RMS	FEEAPPS	0.10	92.50
04/29/25	Draft CNO to February Monthly Fee Statement of PBN	JMO	FEEAPPS	0.10	42.50
04/29/25	Draft CNO to February Monthly Fee Statement of SAK	JMO	FEEAPPS	0.10	42.50
04/29/25	Email to R. Schechter, C. Santaniello and M. Medved regarding draft CNOs to February Monthly Fee Statements	JMO	FEEAPPS	0.10	42.50
04/30/25	Begin drafting Fourth Interim Fee Application of PBN	JMO	FEEAPPS	1.60	680.00
04/30/25	Begin drafting Fourth Interim Fee Application of SAK	JMO	FEEAPPS	0.70	297.50
<b>FEEAPPS Total</b>				<b>10.40</b>	<b>5,092.50</b>
04/14/25	Review and approve pro hac admission of K. Pageau (.1); review email from R.	CAS	FINANCE	0.30	262.50

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<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
	Schechter regarding status of objection to plan and disclosure(.2)				
			<b>FINANCE Total</b>	<b>0.30</b>	<b>262.50</b>
04/07/25	Communications regarding plan and disclosure statement, and continued review of same	RMS	PLANDSCL	0.30	277.50
04/08/25	Review plan, objection and communications regarding same	RMS	PLANDSCL	0.30	277.50
04/10/25	Strategy discussion and review of plan and disclosure statement to determine appropriate winddown and discharge of PCO.	MFM	PLANDSCL	1.50	930.00
04/10/25	Communicate with committee counsel regarding plan and related financial considerations to get to confirmation	RMS	PLANDSCL	0.40	370.00
04/10/25	Review plan materials and provisions relating to resident records; professionals	RMS	PLANDSCL	1.30	1,202.50
04/10/25	Communicate with counsel to the United States trustee regarding plan, financials, and PCO considerations	RMS	PLANDSCL	0.40	370.00
04/10/25	Conduct meeting with M. Medved regarding plan and discharge of PCO	RMS	PLANDSCL	0.20	185.00
04/11/25	Exchange of emails with R. Schechter regarding status of plan and disclosure statement and possible objection.	CAS	PLANDSCL	0.20	175.00
04/11/25	Coordinated attendance for hearing.	MFM	PLANDSCL	0.40	248.00
04/11/25	Draft status update to PCO.	RMS	PLANDSCL	0.40	370.00
04/14/25	Conference with R. Schechter, M. Medved re plan, DS (.3); review documents re same (.2).	KNP	PLANDSCL	0.50	375.00
04/14/25	Call on strategy for disclosure statement hearing.	MFM	PLANDSCL	0.50	310.00
04/14/25	Drafted language to be included in plan and provided to counsel for debtor.	MFM	PLANDSCL	0.80	496.00
04/14/25	Review open plan issues (.6) and communications/correspondence with Debtors' counsel and PCO team regarding potential modifications and upcoming hearing on same (.4)	RMS	PLANDSCL	1.00	925.00
04/15/25	Review Notice of Agenda for Hearing on Plan & DS	JMO	PLANDSCL	0.10	42.50
04/15/25	Email to internal team regarding Notice of Agenda for Hearing on Plan & DS and attendance of same	JMO	PLANDSCL	0.10	42.50

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<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
04/15/25	Review plan and DS documents; review committee objection	KNP	PLANDSCL	0.90	675.00
04/15/25	Continued discussion on strategy for disclosure statement hearing in light of objection by committee.	MFM	PLANDSCL	0.80	496.00
04/15/25	Review committee objection to combined plan and disclosure statement	RMS	PLANDSCL	0.30	277.50
04/16/25	Conference with Debtors' counsel re DS, confirmation order language; review proposed language; correspond with team re hearing	KNP	PLANDSCL	0.60	450.00
04/16/25	Communications with counsel for debtor on language to be included in the plan.	MFM	PLANDSCL	0.70	434.00
04/16/25	Internal discussions on language to be included in the plan.	MFM	PLANDSCL	0.60	372.00
04/16/25	Review plan documents and PCO related items/language (.7) and communications regarding provisions relating to PCO and records (.2).	RMS	PLANDSCL	0.90	832.50
04/17/25	Prepare for hearing; telephonically attend DS hearing; draft summary re same; correspond with PBN team re same	KNP	PLANDSCL	2.20	1,650.00
04/17/25	Proposed final tweak to language termination duties.	MFM	PLANDSCL	0.40	248.00
04/17/25	Review of liquidation analysis and provided suggestion for path forward.	MFM	PLANDSCL	0.40	248.00
04/17/25	Communications regarding updated plan language.	RMS	PLANDSCL	0.30	277.50
04/17/25	Review information relating to hearing on interim plan approval and issues relating to PCO duties, and communications regarding same.	RMS	PLANDSCL	0.30	277.50
04/18/25	Assess records retention/destruction issues and communications regarding addressing same in plan.	RMS	PLANDSCL	0.40	370.00
04/21/25	Communications regarding order on interim plan approval.	RMS	PLANDSCL	0.20	185.00
04/23/25	Review of updated plan and provided communication on same.	MFM	PLANDSCL	0.60	372.00
04/23/25	Review docket and communications regarding plan timeline.	RMS	PLANDSCL	0.20	185.00
04/28/25	Review of plan and disclosure statement for treatment and communications to resolve same.	MFM	PLANDSCL	1.80	1,116.00

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<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
04/28/25	Review information relating to plan confirmation and effective date timeline and communications regarding same	RMS	PLANDSCL	0.30	277.50
04/28/25	Continued review of PCO related terms and communicate with Michael Medved regarding final updates to language prior to confirmation hearing.	RMS	PLANDSCL	0.50	462.50
<b>PLANDSCL Total</b>				<b>20.80</b>	<b>15,802.50</b>
04/01/25	Emails from D. Oswald and R. Snider regarding additional facility reports	JMO	REPORTG	0.30	127.50
04/01/25	Communications regarding notice of sixth report	RMS	REPORTG	0.10	92.50
04/07/25	Begin to draft 6th PCO Report	DMO	REPORTG	1.30	728.00
04/07/25	Drafted and edited final report.	MFm	REPORTG	1.60	992.00
04/08/25	Further edited final report.	MFm	REPORTG	1.60	992.00
04/08/25	Review information for PCO report and communication communications regarding same.	RMS	REPORTG	0.20	185.00
04/09/25	Attended call on final report and next steps.	MFm	REPORTG	0.50	310.00
04/09/25	Communications regarding PCO report.	RMS	REPORTG	0.30	277.50
04/10/25	Draft correspondence to PCO regarding sixth report. (.1) review and revise sixth report. (.9).	RMS	REPORTG	1.00	925.00
04/11/25	Emails from R. Schechter and C. Santaniello regarding reviewing and filing Final PCO Report	JMO	REPORTG	0.50	212.50
04/11/25	Finalize PCO's Sixth Report	JMO	REPORTG	0.10	42.50
04/11/25	Prepare and file PCO's Sixth Report	JMO	REPORTG	0.20	85.00
04/11/25	Service email regarding filed Sixth PCO Report	JMO	REPORTG	0.10	42.50
04/11/25	Review PCO's six report and communications regarding filing	RMS	REPORTG	0.30	277.50
<b>REPORTG Total</b>				<b>8.10</b>	<b>5,289.50</b>
<b>Fees Total</b>				<b>45.70</b>	<b>30,897.50</b>

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<b>Disbursement Summary</b>	<b>Total</b>
Service fees	223.24
<b>Total Disbursements</b>	<b>223.24</b>

#### Disbursement Detail

Date	Description	Amount
04/21/25	VENDOR: Parcels Inc INVOICE#: 1136553 DATE: 4/14/2025	98.08
	Parcels Inc 1136553 04/14/25 Service of filed Sixth PCO Report	
04/21/25	VENDOR: Parcels Inc INVOICE#: 1136824 DATE: 4/15/2025	125.16
	Parcels Inc 1136824 04/15/25 Service of filed February Monthly Fee	
	Statements of PBN & SAK	
	<b>TOTAL DISBURSEMENTS</b>	<b>\$223.24</b>

#### TOTALS FOR THIS MATTER

Professional Services	30,897.50
Disbursements	223.24
Total Professional Services & Disbursements	31,120.74

<b>BALANCE DUE THIS INVOICE</b>	<b>\$ 31,120.74</b>
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Previous Balance Due	31,902.58
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<b>TOTAL AMOUNT DUE INCLUDING THIS INVOICE</b>	<b>\$ 63,023.32</b>
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#### ACCOUNTS RECEIVABLE

INVOICE DATE	INVOICE NUMBER	INVOICE TOTAL	OUTSTANDING BALANCE
01/23/25	3328649	49,979.12	9,984.80
02/19/25	3329672	27,633.26	5,300.80
03/14/25	3330988	50,574.84	10,076.40
04/14/25	3332731	16,525.38	6,540.58
	<b>CURRENT BALANCE DUE</b>	<b>\$144,712.60</b>	<b>\$31,902.58</b>

# EXHIBIT B

**Summary of Expenses – April 1, 2025 – April 30, 2025**

<b>DISBURSEMENTS</b>	<b>AMOUNT</b>
a) <b>Filing/Court Fees</b> Payable to Clerk of Court. (Admission Fees)	\$0.00
b) <b>Computer Assisted Legal Research</b> Westlaw, Lexis and a description of manner calculated.	\$0.00
c) <b>Pacer Fees</b> Payable to the Pacer Service Center for search and/or print.	\$0.00
d) <b>Fax (with rates)</b> No. of Pages ____ Rate per Page ____ (Max. \$1.00/pg.)	\$0.00
e) <b>Case Specific Telephone / Conference Call Charges</b> Exclusive of overhead charges.	\$0.00
f) <b>In-House Reproduction Services</b> Exclusive of overhead charges.	\$0.00
g) <b>Outside Reproduction Services</b> Including scanning services.	\$223.24
h) <b>Other Research</b> Title searches, UCC searches, Asset searches, Accurint.	\$0.00
i) <b>Court Reporting / Deposition Services</b> Transcripts.	\$0.00
j) <b>Travel</b> Mileage, rolls, airfare and parking.	\$0.00
k) <b>Courier &amp; Express Carriers</b> Overnight and personal delivery	\$0.00
l) <b>Postage</b>	\$0.00
m) <b>Other (specify) – Business Meals</b>	\$0.00
<b>DISBURSEMENTS TOTAL:</b>	<b>\$223.24</b>

**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)

Obj. Deadline: May 28, 2025 at 4:00 p.m.

**NOTICE OF THIRTEENTH MONTHLY FEE APPLICATION OF PORZIO,  
BROMBERG & NEWMAN, P.C. AS COUNSEL FOR THE PATIENT CARE  
OMBUDSMAN, FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT  
OF EXPENSES FOR THE PERIOD OF APRIL 1, 2025 THROUGH APRIL 30, 2025**

**PLEASE TAKE NOTICE** that, on May 14, 2025, Porzio, Bromberg & Newman, P.C. (“Porzio”), counsel for Suzanne Koenig, the patient care ombudsman (the “Ombudsman”), filed its Thirteenth Monthly Fee Application (the “Application”) for Allowance of Compensation and Reimbursement of Expenses for the Services Rendered for the Period of April 1, 2025, through April 30, 2025.

If you object to the relief sought by the Application, you are required to file a response to the Application, on or before **May 28, 2025, 4:00 p.m. (ET)**. At the same time, you must also serve a copy of the response upon the Ombudsman’s counsel:

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](mailto:casantaniello@pbnlaw.com)

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  
E-mail: [rmschechter@pbnlaw.com](mailto:rmschechter@pbnlaw.com)  
E-mail: [cpmazza@pbnlaw.com](mailto:cpmazza@pbnlaw.com)

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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).

**PLEASE TAKE FURTHER NOTICE THAT IF NO OBJECTIONS ARE FILED AND SERVED IN ACCORDANCE WITH THE ABOVE PROCEDURES, THEN 80% OF FEES AND 100% OF THE EXPENSES REQUESTED IN THE APPLICATION MAY BE PAID PURSUANT TO THE INTERIM COMPENSATION ORDER WITHOUT FURTHER HEARING OR ORDER OF THE COURT.**

**A HEARING ON THE APPLICATION WILL BE HELD ONLY IF OBJECTIONS ARE FILED, OR IF THE COURT DIRECTS OTHERWISE AT A DATE AND TIME TO BE SCHEDULED BY THE COURT.**

Dated: May 14, 2025

/s/ Cheryl A. Santaniello  
Cheryl A. Santaniello

**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)

**CERTIFICATE OF SERVICE**

I hereby certify that on this 14<sup>th</sup> day of May, 2025, I caused to be filed with the Court electronically, and I caused to be served a true and correct copy of the:

**THIRTEENTH MONTHLY FEE APPLICATION OF PORZIO, BROMBERG &  
NEWMAN, P.C. AS COUNSEL FOR THE PATIENT CARE OMBUDSMAN, FOR  
ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES  
FOR THE PERIOD OF APRIL 1, 2025 THROUGH APRIL 30, 2025**

upon the parties that are registered to receive notice via the Courts' CM/ECF notification system, and additional service was completed by U.S. First Class Mail on the parties listed on **Exhibit A.**

/s/ Cheryl A. Santaniello  
Cheryl A. Santaniello

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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).

**EXHIBIT A**

SC Healthcare Holding, LLC *et al.*  
Attn: David R. Campbell  
830 W. Trailcreek Drive  
Peoria, IL 61614

*Debtors*

Winston & Strawn LLP  
Attn: Gregory M. Gartland,  
Daniel J. McGuire, Joel McKnight  
Mudd  
35 West Wacker Drive  
Chicago, IL 60601

-and-

Winston & Strawn LLP  
Attn: Carrie V. Hardman  
200 Park Avenue  
New York, NY 10166

*Debtors' Counsel*

Young Conaway Stargatt & Taylor,  
LLP  
Attn: Andrew L. Magaziner, Shella  
Borovinskaya, Carol E. Cox  
Rodney Square  
1000 North King Street  
Wilmington, DE 19801

*Debtors' Counsel*

Office of the United States Trustee  
District of Delaware  
Attn: Linda Richenderfer, Jon  
Lipshie  
844 King Street, Suite 2207  
Lockbox 35  
Wilmington, DE 19801

*U.S. Trustee*

Norton Rose Fulbright US LLP  
Attn: Robert M. Hirsh, Emily Hong  
1301 Avenue of the Americas New  
York, NY 10019

*Counsel to DIP Lender*

Morris James LLP  
Attn: Eric J. Monzo  
500 Delaware Avenue  
Suite 1500  
Wilmington, DE 19801

*Counsel to DIP Lender*

Holland & Knight, LLP  
Attn: Tyler Lane  
511 Union Street, Ste. 2700  
Nashville, Tennessee 37219

*Counsel to Column Financial, Inc.*

Landis Rath & Cobb LLP  
Attn: Adam Landis, Rick Cobb  
919 Market Street, Suite 1800  
P.O. Box 2087  
Wilmington, Delaware 19899

*Counsel to Column Financial, Inc.*

Greenberg Traurig, LLP  
Attn: Nancy A. Peterman, Danny  
Duerdoth  
77 West Wacker Drive  
Suite 3100  
Chicago, IL 60601

-and-

Greenberg Traurig, LLP  
Attn: Shari L. Heyen  
1000 Louisiana Street  
Suite 6700  
Houston, TX 77002

-and-

Greenberg Traurig, LLP  
Attn: Anthony W. Clark, Dennis A.  
Meloro  
222 Delaware Avenue  
Suite 1600  
Wilmington, DE 19801

*Counsel to the Official Committee  
of Unsecured Creditors*