

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)

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

**THIRTEENTH MONTHLY FEE 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 1, 2025 THROUGH APRIL 30, 2025**

Name of Applicant:

SAK Management Services, LLC d/b/a SAK
Healthcare

Authorized to Provide
Professional Services to:

Suzanne Koenig, Patient Care Ombudsman

Date of Retention:

May 24, 2024 *nunc pro tunc* to April 16, 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:

\$2,362.50

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

\$0.00

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

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.



Prior Applications:

Dated Filed	Period Covered	Requested		Approved	
		Fees	Expenses	Fees	Expenses
6/6/2024	April 16, 2024 through April 30, 2023	\$29,815.00	\$1,067.41	\$29,815.00	\$1,067.41
7/11/2024	May 1, 2024 through May 31, 2024	\$74,030.00	\$7,440.76	\$74,030.00	\$7,440.76
8/9/2024	June 1, 2024 through June 30, 2024	\$174,680.00	\$11,137.35	\$174,680.00	\$11,137.35
9/16/2024	July 1, 2024 through July 31, 2024	\$121,335.00	\$6,961.91	\$97,068.00	\$6,961.91
10/28/2024	August 1, 2024 through August 31, 2024	\$139,780.00	\$6,834.46	\$111,824.00	\$6,834.46
10/31/2024	September 1, 2024 through September 30, 2024	\$122,985.00	\$9,113.69	\$98,388.00	\$9,113.69
12/20/2024	October 1, 2024 through October 31, 2024	\$136,515.00	\$10,940.18	\$109,212.00	\$10,940.18
12/27/2024	November 1, 2024 through November 30, 2024	\$109,875.00	\$8,049.52	\$87,900.00	\$8,049.52
2/11/2025	December 1, 2024 through December 31, 2024	\$79,645.00	\$5,659.47	\$63,716.00	\$5,659.47
3/17/2025	January 1, 2025 through January 31, 2025	\$45,627.50	\$1,907.61	\$36,502.00	\$1,907.61
4/11/2025	February 1, 2025 through February 28, 2025	\$14,882.50	\$0.00	\$11,906.00	\$0.00
5/14/2025	March 1, 2025 through March 31, 2025	\$3,517.50	\$0.00	N/A	N/A

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FOR THE DISTRICT OF DELAWARE**

In re:

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Debtors.

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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 1, 2025 THROUGH APRIL 30, 2025**

SAK Management Services, LLC d/b/a SAK Healthcare (“SAK”), medical operations advisor 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

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\$2,362.50 and reimbursement of expenses in the amount \$0.00 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 SAK as medical operations advisor for the Ombudsman *nunc pro tunc* to April 16, 2024 [D.I. 275] (the “SAK Retention Application”). A Certification of No Objection regarding the SAK Retention Application was filed on May 23, 2024 [D.I. 351]. The Order approving the SAK Retention Application was entered on May 24, 2024 [D.I. 365].

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 (10th) 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, SAK is seeking compensation in the amount of \$1,890.00 which is equal to 80% of the \$2,362.50 in fees for professional services rendered by SAK during the Compensation Period. This amount is derived solely from the applicable hourly billing rates of SAK's personnel who rendered such services to the Ombudsman. In addition, SAK is seeking reimbursement of expenses incurred during the Compensation Period in the amount of \$0.00.

A. Compensation Requested

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

B. Expense Reimbursement

13. SAK incurred \$0.00 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. Professionals of SAK expended a total of 4.50 hours in connection with this matter during the Compensation Period. The Ombudsman and her 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 SAK's normal hourly rates of compensation for work of this character. The reasonable value of the services rendered by SAK for the Compensation Period as counsel for the Ombudsman in these cases is \$2,362.50.

16. In accordance with the factors enumerated in Bankruptcy Code section 330, SAK 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. SAK's fees are reasonable and appropriate under the applicable legal standard, and should therefore be allowed.

17. SAK 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 SAK 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, SAK believes that such deviations are not material and respectfully requests that any such requirements be waived.

WHEREFORE, SAK 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 \$2,362.50 for the period from April 1, 2025 through April 30, 2025; (ii) payment in the total amount of \$1,890.00 (representing 80% of the total fees (\$1,890.00) billed and 100% of the expenses (\$0.00) incurred during the Compensation Period); and (iii) such other relief as this Court deems just and proper.

**SAK MANAGEMENT SERVICES, LLC
D/B/A SAK HEALTHCARE**

Date: May 14, 2025

/s/ Suzanne Koenig
Suzanne Koenig, Founder & CEO

EXHIBIT A

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

Timekeeper	Position	Rate	Hours	Amount
Suzanne Koenig	President & CEO	\$525.00	4.50	\$2,362.50
Totals:			4.50	\$2,362.50
Blended Rate: \$525				

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

Project Category	Total Hours	Total Fees
Case Administration	2.40	\$1,260.00
Data Analysis	0.30	\$157.50
Report Preparation	1.80	\$945.00
Totals	4.50	\$2,362.50



300 Saunders Road, Suite 300
Riverwoods, IL 60015
847-446-8400
sakhealthcare.com

SAK Management Services

300 Saunders Rd
Suite 300
Riverwoods, IL 60015

May 12, 2025

In re SC Healthcare, LLC, et al., Case no. 24-0443 (TMH)

Invoice Number: 20950

Invoice Period: 04-01-2025 - 04-30-2025

Payment Terms: Upon Receipt

Time Details

Date	Professional	Activity	Sub-Activity	Hours	Rate	Amount
<u>Case Administration</u>						
04-10-2025	Suzanne Koenig	Case Administration		0.80	525.00	420.00
		Discussion with PCO Counsel R. Schechter regarding Sixth PCO Report, winddown, CHOWs, cessation of oversight and site visits, and potential discharge.				
04-11-2025	Suzanne Koenig	Case Administration		0.70	525.00	367.50
		Discussion with PCO Counsel R. Schechter regarding hearing on conditional approval of the plan, disclosure statement, and recommended discharge approach.				
04-15-2025	Suzanne Koenig	Case Administration		0.50	525.00	262.50
		Discussion with D. Campbell, CRO Peterson and SM Financial Cervies regarding monetization of receivables.				
04-28-2025	Suzanne Koenig	Case Administration		0.40	525.00	210.00
		Confer with PCO Counsel R. Schechter regarding status update and motion to be relieved.				
				2.40		1,260.00
<u>Data Analysis</u>						
04-04-2025	Suzanne Koenig	Data Analysis		0.30	525.00	157.50
		Review inquiry from family members on behalf of resident.				
				0.30		157.50
<u>Report Preparation</u>						
04-01-2025	Suzanne Koenig	Report Preparation		0.70	525.00	367.50
		Review email conversation with R. Snider and K. Hufsey, SAK PCO Team regarding remaining visit to Courtyard Estates of Walcott (.2); Exchange emails with counsel regarding transition of license for various facilities (.2); Review email from D. Bryner, Arcadia confirming posting of notice of sixth PCO report at three remaining facilities (.3).				
04-10-2025	Suzanne Koenig	Report Preparation		1.00	525.00	525.00
		Review and comment on Sixth PCO Report.				
04-11-2025	Suzanne Koenig	Report Preparation		0.10	525.00	52.50

We appreciate your business

Page 1 of 3

Date	Professional	Activity	Sub-Activity	Hours	Rate	Amount
<u>Report Preparation</u>						
		Authorize filing of Sixth PCO Report.				
				1.80		945.00
				Total		2,362.50

Time Summary

Professional			Hours	Rate	Amount
Suzanne Koenig			4.50	525.00	2,362.50
			Total		2,362.50
Activity			Hours	Rate	Amount
Case Administration			2.40	525.00	1,260.00
Data Analysis			0.30	525.00	157.50
Report Preparation			1.80	525.00	945.00
			Total Fees		2,362.50
Activity	Professional		Hours	Rate	Amount
Case Administration	Suzanne Koenig		2.40	525.00	1,260.00
Data Analysis	Suzanne Koenig		0.30	525.00	157.50
Report Preparation	Suzanne Koenig		1.80	525.00	945.00
			Total Fees		2,362.50

Total for this Invoice 2,362.50

SC Healthcare

May 12, 2025

SAK Management Services
300 Saunders Rd
Suite 300
Riverwoods, IL 60015

Invoice Number: 20950
Invoice Period: 04-01-2025 - 04-30-2025

REMITTANCE COPY

RE: SC Healthcare - Patient Care Ombudsman Appointment

Fees	2,362.50
Total for this Invoice	2,362.50

EXHIBIT B

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

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

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In re:

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Debtors.

Chapter 11

Case No. 24-10443 (TMH)

(Jointly Administered)

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

**NOTICE TO THIRTEENTH MONTHLY FEE 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 1, 2025 THROUGH APRIL 30, 2025**

PLEASE TAKE NOTICE that, on May 14, 2025, SAK Management Services, LLC d/b/a SAK Healthcare (“SAK”), medical operations advisor to 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

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
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E-mail: cpmazza@pbnlaw.com

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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

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In re:

SC HEALTHCARE HOLDING, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 24-10443 (TMH)

(Jointly Administered)

CERTIFICATE OF SERVICE

I hereby certify that on this 14th 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 SAK MANAGEMENT
SERVICES, LLC D/B/A SAK HEALTHCARE, AS MEDICAL OPERATIONS
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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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EXHIBIT A

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

Debtors

Winston & Strawn LLP
Attn: Gregory M. Gartland,
Daniel J. McGuire, Joel McKnight
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-and-

Winston & Strawn LLP
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Debtors' Counsel

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Borovinskaya, Carol E. Cox
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Debtors' Counsel

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Wilmington, DE 19801

U.S. Trustee

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Counsel to Column Financial, Inc.

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-and-

Greenberg Traurig, LLP
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Houston, TX 77002

-and-

Greenberg Traurig, LLP
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Meloro
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Wilmington, DE 19801

*Counsel to the Official Committee
of Unsecured Creditors*