

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

In re:	Chapter 11
SC HEALTHCARE HOLDING, LLC, <i>et al.</i> , ¹	Case No. 24-10443 (TMH)
Debtors.	(Jointly Administered)
Obj. Deadline: June 4, 2025 at 4:00 p.m. Hearing Date: TBD	

**SUMMARY OF FOURTH 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 JANUARY 1, 2025 THROUGH MARCH 31, 2025**

Name of Applicant:	<u>Porzio, Bromberg & Newman, P.C.</u>
Authorized to Provide Professional Services as:	<u>Counsel to Suzanne Koenig, Patient Care Ombudsman</u>
Effective Date of Retention:	<u>May 24, 2024 <i>nunc pro tunc</i> to April 18, 2024</u>
Period for Which Compensation and Reimbursement is Sought:	<u>January 1, 2025 through March 31, 2025</u>
Amount of Compensation sought as actual, reasonable and necessary legal services rendered:	<u>\$91,533.50</u>
Amount of Expense Reimbursement sought as actual, reasonable and necessary:	<u>\$3,199.98</u>
This is a(n): <u> </u> monthly <u> X </u> interim <u> </u> 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:

Monthly Fee Application Filing Date & Docket No.	Period Covered	Total Fees Requested	Total Expenses Requested	CNO Filing Date & Docket No.	Amount of Fees Authorized to be Paid (80%)	Amount of Expenses Authorized to be Paid (100%)
June 6, 2024 [Dkt. No. 513]	April 18, 2024 through April 30, 2024	\$29,313.50	\$50.00	June 21, 2024 [Dkt. No. 548]	\$29,313.50	\$50.00
July 11, 2024 [Dkt. No. 658]	May 1, 2024 through May 31, 2024	\$58,328.50	\$502.00	July 25, 2024 [Dkt. No. 716]	\$58,328.50	\$502.00
August 9, 2024 [Dkt. No. 743]	June 1, 2024 through June 30, 2024	\$49,695.50	\$327.72	August 26, 2024 [Dkt. No. 786]	\$49,695.50	\$327.72
September 16, 2024 [Dkt. No. 834]	July 1, 2024 through July 31, 2024	\$38,666.00	\$2,392.49	October 9, 2024 [Dkt. No. 901]	\$38,666.00	\$2,392.49
October 28, 2024 [Dkt. No. 950]	August 1, 2024 through August 31, 2024	\$46,143.50	\$190.76	November 13, 2024 [Dkt. No. 997]	\$46,143.50	\$190.76
October 31, 2024 [Dkt. No. 964]	September 1, 2024 through September 30, 2024	\$24,960.50	\$1,554.51	November 15, 2024 [Dkt. No. 1017]	\$24,960.50	\$1,554.51
December 20, 2024 [Dkt. No. 1109]	October 1, 2024 through October 31, 2024	\$55,444.00	\$19.70	January 6, 2025 [Dkt. No. 1157]	\$55,444.00	\$19.70
December 27, 2024 [Dkt. No. 1129]	November 1, 2024 through November 30, 2024	\$44,972.00	\$1,381.64	January 14, 2025 [Dkt. No. 1185]	\$44,972.00	\$1,381.64
February 11, 2025 [Dkt. No. 1251]	December 1, 2024 through December 31, 2024	\$49,924.00	\$55.12	February 27, 2025 [Dkt. No. 1293]	\$49,924.00	\$55.12
March 17, 2025 [Dkt. No. 1340]	January 1, 2025 through January 31, 2025	\$26,504.00	\$1,129.26	April 2, 2025 [Dkt. No. 1373]	\$21,203.20	\$1,129.26

Monthly Fee Application Filing Date & Docket No.	Period Covered	Total Fees Requested	Total Expenses Requested	CNO Filing Date & Docket No.	Amount of Fees Authorized to be Paid (80%)	Amount of Expenses Authorized to be Paid (100%)
April 11, 2025 [Dkt. No. 1383]	February 1, 2025 through February 28, 2025	\$50,382.00	\$192.84	May 7, 2025 [Dkt. No. 1556]	\$40,305.60	\$192.84
May 14, 2025 [Dkt. No. 1572]	March 1, 2025 through March 31, 2025	\$14,647.50	\$1,877.88	N/A	N/A	N/A
TOTALS:		\$488,981.00	\$9,673.92		\$438,873.10	\$7,796.04

Compensation By Category for Fourth Interim Compensation Period

	Tenth Monthly Application (January 1, 2025 through January 31, 2025)		Eleventh Monthly Application (February 1, 2025 through February 28, 2025)		Twelfth Monthly Application (March 1, 2025 through March 31, 2025)		Total	
	Hours	Amount	Hours	Amount	Hours	Amount	Hours	Amount
Asset Disposition	11.30	\$5,648.00	0.00	\$0.00	0.00	\$0.00	11.30	\$5,648.00
Business Operations	11.20	\$5,789.50	1.30	\$1,202.50	0.80	\$740.00	13.30	\$7,732.00
Case Administration	5.80	\$2,705.50	0.40	\$320.00	3.30	\$2,578.00	9.50	\$5,603.50
Claims Administration and Objections	0.00	\$0.00	1.00	\$706.00	1.60	\$1,480.00	2.60	\$2,186.00
Fee/Employment Applications	8.30	\$3,163.50	25.60	\$13,278.50	8.20	\$4,153.50	42.10	\$20,595.50
Fee/Employment Objections	0.00	\$0.00	0.10	\$92.50	0.00	\$0.00	0.10	\$92.50
Financing	1.70	\$1,232.00	0.20	\$185.00	0.00	\$0.00	1.90	\$1,417.00
Litigation (other than Avoidance Action Litigation)	0.00	\$0.00	4.60	\$2,977.50	0.00	\$0.00	4.60	\$2,977.50
Non-Working Travel ¹	0.00	\$0.00	0.00	\$0.00	2.80	\$1,295.00	2.80	\$1,295.00
Plan and Disclosure Statement	0.00	\$0.00	0.00	\$0.00	1.70	\$1,372.50	1.70	\$1,372.50
Reporting	17.40	\$7,965.50	54.40	\$31,620.00	5.20	\$3,028.50	77.00	\$42,614.00
TOTAL:	55.70	\$26,504.00	87.60	\$50,382.00	23.60	\$14,647.50	166.90	\$91,533.50

¹ Non-Working Travel billed at a 50% rate.

Timekeeper Summary for Fourth Interim Compensation Period

				Tenth Monthly Application (January 1, 2025 through January 31, 2025)		Eleventh Monthly Application (February 1, 2025 through February 28, 2025)		Twelfth Monthly Application (March 1, 2025 through March 31, 2025)		Total	
Timekeeper	Position	2024 Rate	2025 Rate	Hours	Amount	Hours	Amount	Hours	Amount	Hours	Amount
Robert M. Schechter	Principal in Bankruptcy Department since 2014, Member of NJ Bar since 2005	\$835.00	\$925.00	6.00	\$5,010.00	10.50	\$9,712.50	9.80	\$7,770.00	26.30	\$22,492.50
Cheryl A. Santaniello	Principal in Bankruptcy Department since 2020, Member of DE Bar since 2007	\$770.00	\$875.00	0.20	\$154.00	0.40	\$350.00	0.00	\$0.00	0.60	\$504.00
Dean M. Oswald	Associate in Bankruptcy Department since 2021, Member of NY Bar since 2022	\$460.00	\$560.00	38.50	\$17,710.00	57.20	\$32,032.00	7.50	\$4,200.00	103.20	\$53,942.00
Maria P. Dermatis	Paralegal in Bankruptcy Department since 2009	\$370.00	\$425.00	0.00	\$0.00	1.10	\$467.50	0.80	\$340.00	1.90	\$807.50
Jessica M. O'Connor	Paralegal in Bankruptcy Department since 2020	\$330.00	\$425.00	11.00	\$3,630.00	18.40	\$7,820.00	5.50	\$2,337.50	34.90	\$13,787.50
TOTAL				55.70	\$26,504.00	87.60	\$50,382.00	23.60	\$14,647.50	166.90	\$91,533.50

Summary of Expenses for Fourth Interim Compensation Period

Disbursements	Tenth Monthly Application (January 1, 2025 through January 31, 2025)	Eleventh Monthly Application (February 1, 2025 through February 28, 2025)	Twelfth Monthly Application (March 1, 2025 through March 31, 2025)	Total
a) Filing/Court Fees Payable to Clerk of Court. (Admission Fees)	\$0.00	\$0.00	\$0.00	\$0.00
b) Computer Assisted Legal Research Westlaw, Lexis and a description of manner calculated.	\$0.00	\$0.00	\$0.00	\$0.00
c) Pacer Fees Payable to the Pacer Service Center for search and/or print.	\$0.00	\$0.00	\$0.00	\$0.00
d) Fax (with rates) No. of Pages ____ Rate per Page ____ (Max. \$1.00/pg.)	\$0.00	\$0.00	\$0.00	\$0.00
e) Case Specific Telephone / Conference Call Charges Exclusive of overhead charges. Court Appearances	\$0.00	\$0.00	\$0.00	\$0.00
f) In-House Reproduction Services Exclusive of overhead charges.	\$0.00	\$0.00	\$0.00	\$0.00
g) Outside Reproduction Services Including scanning services.	\$1,129.26	\$192.84	\$1,632.88	\$2,954.98
h) Other Research Title searches, UCC searches, Asset searches, Accurint.	\$0.00	\$0.00	\$0.00	\$0.00
i) Court Reporting / Deposition Services Transcripts.	\$0.00	\$0.00	\$0.00	\$0.00
j) Travel Mileage, rolls, airfare and parking	\$0.00	\$0.00	\$232.00	\$232.00
k) Courier & Express Carriers Overnight and personal delivery	\$0.00	\$0.00	\$0.00	\$0.00
l) Postage	\$0.00	\$0.00	\$0.00	\$0.00
m) Other (specify) – Business Meals	\$0.00	\$0.00	\$13.00	\$13.00
DISBURSEMENTS TOTAL	\$1,129.26	\$192.84	\$1,877.88	\$3,199.98

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(Jointly Administered)

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& NEWMAN, P.C., AS COUNSEL TO THE PATIENT CARE OMBUDSMAN, FOR
ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES
FOR THE PERIOD OF JANUARY 1, 2025 THROUGH MARCH 31, 2025**

Porzio, Bromberg & Newman, P.C. (“Porzio”), counsel to Suzanne Koenig, the patient care ombudsman (the “Ombudsman”) appointed in the above-captioned chapter 11 cases (the “Chapter 11 Cases”) of SC Healthcare Holding, LLC, *et al.* (collectively, the “Debtors”), hereby files its fourth interim fee application (the “Application”) seeking entry of an order pursuant to section 331 of title 11 of the United States Code, 11 U.S.C. §§101 *et seq.*, as amended (the “Bankruptcy Code”) for allowance of interim compensation in the amount of \$91,533.50 and reimbursement of expenses in the amount of \$3,199.98 for the period of January 1, 2025 through March 31, 2025 (the “Interim Compensation Period”), and in support thereof, Porzio respectfully represents as follows:

JURISDICTION

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).

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. 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 (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.

11. Furthermore, the Interim Compensation Order provides that, beginning with the approximate three-month period from the Petition Date and ending on June 30, 2024, and at three-month intervals thereafter (each, “Interim Fee Period”), each of the Retained Professionals (as defined in the Interim Compensation Order) must file with the Court and serve on the Notice Parties a request for interim Court approval and allowance, pursuant to section 331 of the

Bankruptcy Code, of the compensation and reimbursement of expenses sought in the Monthly Fee Applications filed during such three-month period.

SERVICES PROVIDED BY PORZIO

12. During this Interim Compensation Period, Porzio, in its capacity as counsel for the Ombudsman, devoted time to the following:

a. Asset Disposition

Hours: 11.30 Fees: \$5,648.00

Porzio analyzed issues related to the sale of the Debtors' assets, including buyer obligations for operating expenses during the period wherein the Debtors' licenses were to be continued to be used and additional items for the post-closing period. Porzio also spent time analyzing issues relating to the use of sale proceeds in light of a motion to convert the Debtors' bankruptcy proceeding to a chapter 7 being filed as well as budgeting matters potentially impacting an orderly wind-down.

b. Business Operations

Hours: 13.30 Fees: \$7,732.00

Porzio also analyzed documents and information relating to the Debtors' transfer of operations and management of its facilities to their respective buyers and their operators and the issuance of licenses to those operators. Porzio analyzed this information and engaged in discussions with the Ombudsman and her representatives to assist them with the scope of their continued monitoring and reporting obligations. To the extent that the Ombudsman was unable to obtain timely information, the Ombudsman, with Porzio's assistance, prepared formal discovery to be served on parties and was ready to utilize formal discovery tools if necessary to gain access to information relating to business operation issues that could impact pertinent interests. Such work was done to ensure that the Ombudsman conducted appropriate due diligence to determine if and

when Debtor licenses were no longer being utilized at the facilities and continued her monitoring and reporting obligations of the Debtors' facilities throughout this Interim Period to the extent the Ombudsman could not confirm same through other measures. Porzio continued to update the information it maintained regarding facility closures and each facility's CHOW status during the Interim Compensation Period. Porzio's understanding and maintaining of this information was integral to its ability to provide the Ombudsman and her representatives with accurate record maintenance and valuable counsel.

c. Case Administration

Hours: 9.50 Fees: \$5,603.50

During the Interim Compensation Period, Porzio monitored and assessed case scheduling issues, procedures, Debtors' liquidity, and hearing agendas to ensure that no proceedings were going forward that would impact the Ombudsman's duties and her ability to adequately fulfill her obligations under the Bankruptcy Code. Porzio also spent time analyzing procedural considerations relating to the ombudsman's continuing role in these bankruptcy proceedings.

d. Claims Administration

Hours: 2.60 Fees: \$2,186.00

Porzio analyzed matters and attended a hearing relating to administrative claims.

e. Fee/Employment Applications

Hours: 42.10 Fees: \$20,595.50

Porzio prepared, reviewed, revised, and finalized the monthly and interim fee applications of Porzio, as counsel to the Ombudsman, and of SAK Management Services, LLC, as Medical Operations Advisor to the Ombudsman, which specializes in all phases of long-term care operations, skilled nursing, and senior living, particularly in turn-around situations and rescuing

troubled facilities. Although the Ombudsman has vast experience in the health care field, she is not an attorney and requires the assistance of bankruptcy counsel with significant health care related experience.

f. Financing

Hours: 1.90 Fees: \$1,471.00

Porzio spent time considering issues relating to whether the Debtors possessed the financial wherewithal to continue meeting their financial obligations and to navigate the chapter 11 process into a successful reorganization plan that contained provisions providing for an orderly winding down of the Debtors' estate.

g. Litigation

Hours: 4.60 Fees: \$2,977.50

Porzio analyzed certain filings relating to the Debtors' secured creditor and Mark Peterson, including a resolution under bankruptcy rule 9019, and prepared a subpoena due to a lack of information flow from the Debtors.

h. Plan and Disclosure Statement

Hours: 1.70 Hours: \$1,372.50

Porzio analyzed filings relating to the Debtors' plan and disclosure statement.

i. Reporting

Hours: 77.00 Hours: \$42,614.00

This category includes services relating to compiling and analyzing data, as well as drafting, reviewing, revising and finalizing information to be included in the Ombudsman's reports. The Ombudsman and her representatives visited facilities during the Interim Compensation Period and additionally maintained oversight through monitoring of information on the Debtors' facilities due to the Debtors' facility licenses still being utilized post-sale closings. Throughout this process, the Ombudsman worked closely with Porzio to gather and utilize

information to be included in reports. As stated in the Ombudsman's reports, such information was at times difficult to obtain and the Ombudsman expended considerable time and effort to ensure that the Ombudsman adhered to her monitoring and oversight obligations. The Ombudsman and Porzio collaborated to determine the status of the Debtors' licenses as information was gathered from the Debtors or state regulations. Porzio then utilized such information relating to operations and licensure issues to assist the Ombudsman with her reporting obligations.

MONTHLY FEE APPLICATIONS

13. On March 17, 2025, Porzio filed its tenth monthly application for compensation and reimbursement of expenses [D.I. 1340] (the "Tenth Monthly Application"). By the Tenth Monthly Application, Porzio sought approval of compensation of \$26,504.00 and reimbursement of expenses in the amount of \$1,129.26 for the period of January 1, 2025 through January 31, 2025. The deadline to object to the Tenth Monthly Application was March 31, 2025. On April 2, 2025, Porzio filed a certificate of no objection to the Tenth Monthly Application [D.I. 1373].

14. On April 11, 2025, Porzio filed its eleventh monthly application for compensation and reimbursement of expenses [D.I. 1383] (the "Eleventh Monthly Application"). By the Eleventh Monthly Application, Porzio sought approval of compensation of \$50,382.00 and reimbursement of expenses in the amount of \$192.84 for the period of February 1, 2025 through February 28, 2025. The deadline to object to the Eleventh Monthly Application was April 25, 2025. On May 7, 2025, Porzio filed a certificate of no objection to the Eleventh Monthly Application [D.I. 1556].

15. On May 14, 2025, Porzio filed its twelfth monthly application for compensation and reimbursement of expenses [D.I. 1572] (the "Twelfth Monthly Application"). By the Twelfth Application, Porzio sought approval of compensation of \$14,647.50 and reimbursement of

expenses in the amount of \$1,877.88 for the period of March 1, 2025 through March 31, 2025. The deadline to object to the Twelfth Monthly Application is May 28, 2025.

16. The total sum due to Porzio for professional services rendered on behalf of the Ombudsman during the Interim Compensation Period is \$91,533.50. A chart detailing the fees in each of the applications during the Interim Compensation Period, by professional and by category, is attached as **Exhibit A**. Porzio submits that the professional services it rendered on behalf of the Ombudsman during this time were both reasonable and necessary.

17. Porzio incurred \$3,199.98 of expenses during the Interim Compensation Period. A chart detailing the specific disbursements during the Interim Compensation Period is attached hereto as **Exhibit B**.

18. The undersigned hereby attests that she has reviewed the requirements of Local Rule 2016-1 and this Application conforms to such requirements, including that travel time was not billed at more than half rate and copying charges were only \$.10 per page.

VALUATION OF SERVICES

19. Attorneys and paraprofessionals of Porzio have expended a total of 166.90 hours in connection with this matter during the Interim Compensation Period.

20. The amount of time spent by each of the professionals providing services to the Ombudsman for the Interim 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 Interim Compensation Period as counsel for the Ombudsman in these cases is \$91,533.50.

21. 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.

22. 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. Accordingly, by this Application, Porzio requests that the Court allow and approve payment of one hundred (100%) of the fees and expenses incurred by Porzio during the Interim Compensation Period of January 1, 2025 through March 31, 2025.

NOTICE

23. Notice of this Application will be given via first class mail to: (a) the Debtors, 830 W. Trailcreek Drive, Peoria, IL 61614, Attn: David R. Campbell (dcampbell@getzlerhenrich.com); (b) co-counsel to the Debtors, Winston & Strawn LLP, 35 West Wacker Drive, Chicago, IL 60601, Attn.: Gregory M. Gartland (ggartland@winston.com), Daniel J. McGuire (dmcguire@winston.com), and Joel McKnight Mudd (jmudd@winston.com) and 200 Park Avenue, New York, NY 10166, Attn.: Carrie V. Hardman (chardman@winston.com) and Young Conaway Stargatt & Taylor, LLP, Rodney Square, 1000 North King Street, Wilmington, DE 19801, Attn.: Andrew L. Magaziner (amagaziner@ycst.com), Shella Borovinskaya (sborovinskaya@ycst.com), and Carol E. Cox (ccox@ycst.com); (c) the U.S. Trustee, 844 King Street, Suite 2207, Lockbox 35, Wilmington, DE 19801, Attn: Linda Richenderfer (Linda.Richenderfer@usdoj.gov) and Jon Lipshie (Jon.Lipshie@usdoj.gov); (d) counsel to the Official Committee of Unsecured Creditors, Greenberg Traurig, LLP, 77 West Wacker Drive, Suite 3100, Chicago, IL 60601, Attn: Nancy A. Peterman (peterman@gtlaw.com) and Danny

Duerdoth (duerdothd@gtlaw.com), and 1000 Louisiana Street, Suite 6700, Houston, TX 77002, Attn: Shari L. Heyen (shari.heyen@gtlaw.com), and 222 Delaware Avenue, Suite 1600, Wilmington, DE 19801, Attn: Anthony W. Clark (anthony.clark@gtlaw.com) and Dennis A. Meloro (dennis.meloro@gtlaw.com); (e) counsel to the DIP Lender, Norton Rose Fulbright US LLP, 1301 Avenue of the Americas, New York, NY 10019, Attn: Robert M. Hirsh (robert.hirsh@nortonrosefulbright.com) and Emily Hong (emily.hong@nortonrosefulbright.com) and Morris James LLP, 500 Delaware Avenue, Suite 1500, Wilmington, DE 19801, Attn: Eric J. Monzo (emonzo@morrisjames.com); and (f) counsel to Column Financial, Inc., Holland & Knight, LLP, 511 Union Street, Ste. 2700, Nashville, Tennessee 37219, Attn: Tyler Lane (tyler.layne@hklaw.com) and Landis Rath & Cobb LLP, 919 Market Street, Suite 1800, P.O. Box 2087, Wilmington, Delaware 19899, Attn: Adam Landis (landis@lrclaw.com) and Rick Cobb (cobb@lrclaw.com).

RESERVATION OF RIGHTS

24. Porzio does not waive, and expressly reserves its right to respond to any objections regarding this Application and the amounts sought hereunder.

NO PRIOR REQUEST

25. No previous request for the relief sought herein has been made to this Court or to any other court.

WHEREFORE, Porzio respectfully requests pursuant to the procedures allowed in the Interim Compensation Order: (i) approval of allowance of interim compensation for necessary and valuable legal services rendered by Porzio to the Ombudsman in the sum of \$91,533.50 and reimbursement of expenses in the sum of \$3,199.98 for the period from January 1, 2025 through March 31, 2025; (ii) payment of the outstanding amount of such sums, including payment of any

20% holdback that was withheld from payment under the Monthly Fee Applications; and (iii) such other and further relief as is just and proper.

Date: May 14, 2025

/s/ Cheryl A. Santaniello

Cheryl A. Santaniello, Esq. (DE Bar No. 5062)
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-and-

Robert M. Schechter, Esq. (*pro hac vice*)
Christopher P. Mazza, Esq. (*pro hac vice*)
Porzio, Bromberg & Newman, P.C.
100 Southgate Parkway
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Counsel for the Patient Care Ombudsman

**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: June 4, 2025 at 4:00 p.m.
Hearing Date: TBD

**DECLARATION OF CHERYL A. SANTANIELLO, IN SUPPORT OF THE
FOURTH 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 JANUARY 1, 2025 THROUGH MARCH 31, 2025**

I, Cheryl A. Santaniello, under penalty of perjury, declare as follows:

1. I am a principal at the firm of Porzio, Bromberg & Newman, P.C. ("Porzio"), counsel to Suzanne Koenig, the patient care ombudsman (the "Ombudsman").

2. I have read the foregoing Fourth Interim Fee Application of Porzio, Bromberg & Newman, P.C., Counsel to the Patient Care Ombudsman, for Allowance of Compensation and Reimbursement of Expenses for the Interim Compensation Period of January 1, 2025 through March 31, 2025 and know the contents thereof. The same contents are true to the best of my knowledge, except as to matters therein alleged to be upon information and belief, and as to those matters, I believe them to be true. I have personally performed many of the legal services rendered by Porzio and am thoroughly familiar with all other work performed on behalf of the Ombudsman by the attorneys and paraprofessionals in Porzio.

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.

3. In accordance with Rule 2016(a) of the Federal Rules of Bankruptcy Procedure and Section 504 of the Title 11, United States Code, no agreement or understanding exists between Porzio and any other person for the sharing of compensation to be received in connection with the above-captioned case.

4. I have reviewed the requirements of Local Rule 2016-2 of the United States Bankruptcy Court for the District of Delaware, and to the best of my knowledge, information and belief, this Application complies with Local Rule 2016-2.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed on May 14, 2025

/s/ Cheryl A. Santaniello
Cheryl A. Santaniello

EXHIBIT A

Compensation By Category for Fourth Interim Compensation Period

	Tenth Monthly Application (January 1, 2025 through January 31, 2025)		Eleventh Monthly Application (February 1, 2025 through February 28, 2025)		Twelfth Monthly Application (March 1, 2025 through March 31, 2025)		Total	
	Hours	Amount	Hours	Amount	Hours	Amount	Hours	Amount
Asset Disposition	11.30	\$5,648.00	0.00	\$0.00	0.00	\$0.00	11.30	\$5,648.00
Business Operations	11.20	\$5,789.50	1.30	\$1,202.50	0.80	\$740.00	13.30	\$7,732.00
Case Administration	5.80	\$2,705.50	0.40	\$320.00	3.30	\$2,578.00	9.50	\$5,603.50
Claims Administration and Objections	0.00	\$0.00	1.00	\$706.00	1.60	\$1,480.00	2.60	\$2,186.00
Fee/Employment Applications	8.30	\$3,163.50	25.60	\$13,278.50	8.20	\$4,153.50	42.10	\$20,595.50
Fee/Employment Objections	0.00	\$0.00	0.10	\$92.50	0.00	\$0.00	0.10	\$92.50
Financing	1.70	\$1,232.00	0.20	\$185.00	0.00	\$0.00	1.90	\$1,417.00
Litigation (other than Avoidance Action Litigation)	0.00	\$0.00	4.60	\$2,977.50	0.00	\$0.00	4.60	\$2,977.50
Non-Working Travel ¹	0.00	\$0.00	0.00	\$0.00	2.80	\$1,295.00	2.80	\$1,295.00
Plan and Disclosure Statement	0.00	\$0.00	0.00	\$0.00	1.70	\$1,372.50	1.70	\$1,372.50
Reporting	17.40	\$7,965.50	54.40	\$31,620.00	5.20	\$3,028.50	77.00	\$42,614.00
TOTAL:	55.70	\$26,504.00	87.60	\$50,382.00	23.60	\$14,647.50	166.90	\$91,533.50

¹ Non-Working Travel billed at a 50% rate.

Timekeeper Summary for Fourth Interim Compensation Period

			Seventh Monthly Application (October 1, 2024 through October 31, 2024)		Eighth Monthly Application (November 1, 2024 through November 30, 2024)		Ninth Monthly Application (December 1, 2024 through December 31, 2024)		TOTAL	
Timekeeper	Position	2024 Rate	Hours	Amount	Hours	Amount	Hours	Amount	Hours	Amount
Robert M. Schechter	Principal in Bankruptcy Department since 2014, Member of NJ Bar since 2005	\$835.00	14.80	\$12,358.00	18.80	\$15,698.00	21.40	\$17,869.00	55.00	\$45,925.00
Cheryl A. Santaniello	Principal in Bankruptcy Department since 2020, Member of DE Bar since 2007	\$770.00	4.00	\$3,080.00	1.10	\$847.00	3.10	\$2,387.00	8.20	\$6,314.00
Dean M. Oswald	Associate in Bankruptcy Department since 2021, Member of NY Bar since 2022	\$460.00	52.90	\$24,334.00	44.20	\$20,332.00	46.90	\$21,574.00	144.00	\$66,240.00
Jenny Zhou	Law Clerk in Bankruptcy Department since 2023	\$400.00	6.90	\$2,760.00	0.00	\$0.00	0.00	\$0.00	6.90	\$2,760.00
Maria P. Dermatis	Paralegal in Bankruptcy Department since 2009	\$370.00	12.60	\$4,662.00	0.60	\$222.00	2.70	\$999.00	15.90	\$5,883.00
Jessica M. O'Connor	Paralegal in Bankruptcy Department since 2020	\$330.00	25.00	\$8,250.00	23.30	\$7,689.00	21.50	\$7,095.00	69.80	\$23,034.00
Kayla Dunn	Legal Assistant in Bankruptcy Department since 2024	\$230.00	0.00	\$0.00	0.80	\$184.00	0.00	\$0.00	0.80	\$184.00
TOTAL			116.20	\$55,444.00	88.80	\$44,972.00	95.60	\$49,924.00	300.60	\$150,340.00

EXHIBIT B

Summary of Expenses for Fourth Interim Compensation Period

Disbursements	Tenth Monthly Application (January 1, 2025 through January 31, 2025)	Eleventh Monthly Application (February 1, 2025 through February 28, 2025)	Twelfth Monthly Application (March 1, 2025 through March 31, 2025)	Total
a) Filing/Court Fees Payable to Clerk of Court. (Admission Fees)	\$0.00	\$0.00	\$0.00	\$0.00
b) Computer Assisted Legal Research Westlaw, Lexis and a description of manner calculated.	\$0.00	\$0.00	\$0.00	\$0.00
c) Pacer Fees Payable to the Pacer Service Center for search and/or print.	\$0.00	\$0.00	\$0.00	\$0.00
d) Fax (with rates) No. of Pages ____ Rate per Page ____ (Max. \$1.00/pg.)	\$0.00	\$0.00	\$0.00	\$0.00
e) Case Specific Telephone / Conference Call Charges Exclusive of overhead charges. Court Appearances	\$0.00	\$0.00	\$0.00	\$0.00
f) In-House Reproduction Services Exclusive of overhead charges.	\$0.00	\$0.00	\$0.00	\$0.00
g) Outside Reproduction Services Including scanning services.	\$1,129.26	\$192.84	\$1,632.88	\$2,954.98
h) Other Research Title searches, UCC searches, Asset searches, Accurint.	\$0.00	\$0.00	\$0.00	\$0.00
i) Court Reporting / Deposition Services Transcripts.	\$0.00	\$0.00	\$0.00	\$0.00
j) Travel Mileage, rolls, airfare and parking	\$0.00	\$0.00	\$232.00	\$232.00
k) Courier & Express Carriers Overnight and personal delivery	\$0.00	\$0.00	\$0.00	\$0.00
l) Postage	\$0.00	\$0.00	\$0.00	\$0.00
m) Other (specify) – Business Meals	\$0.00	\$0.00	\$13.00	\$13.00
DISBURSEMENTS TOTAL	\$1,129.26	\$192.84	\$1,877.88	\$3,199.98

**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: June 4, 2025 at 4:00 p.m.

Hearing Date: TBD

**NOTICE OF FOURTH 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 JANUARY 1, 2025 THROUGH MARCH 31, 2025**

PLEASE TAKE NOTICE that on May 14, 2025, Porzio, Bromberg & Newman, P.C. ("Porzio"), counsel to Suzanne Koenig, the patient care ombudsman (the "Ombudsman"), pursuant to the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [D.I. 235] (the "Interim Compensation Order") filed its Fourth Interim Fee Application ("Application") seeking allowance of fees in the amount of \$91,533.50 and reimbursement of expenses in the amount of \$3,199.98 for the period of January 1, 2025 through March 31, 2025.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Interim Compensation Order, objections if any, to the Application summarized above, must be filed with the Court and served on the undersigned counsel at the address set forth below and the additional Notice Parties (as defined in the Interim Compensation Order) so as to be actually received **on or before 4:00 p.m. (prevailing Eastern Time) June 4, 2025:**

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.

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If no objections to the Application are timely filed and received in accordance with such notice, the Court may enter an order granting the Application without a hearing.

PLEASE TAKE FURTHER NOTICE that a hearing to consider this Application will be held on **a date to be determined by the Court** before the Honorable Thomas M. Horan, Judge at the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 5th Floor, Courtroom #6, Wilmington, Delaware 19801.

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.*,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 *Fourth 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 Compensation Period of January 1, 2025 Through March 31, 2025* (the “Application”) 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

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.

EXHIBIT A

SC Healthcare Holding, LLC *et al.*
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*Counsel to the Official Committee
of Unsecured Creditors*