

**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

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

Name of Applicant:

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

Authorized to Provide Professional Services as:

Suzanne Koenig, Patient Care Ombudsman

Effective Date of Retention:

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

Period for Which Compensation and
Reimbursement is Sought:

January 1, 2025 through March 31, 2025

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

\$64,027.50

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

\$1,907.61

This is a(n): monthly X 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:

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. 514]	April 16, 2024 through April 30, 2024	\$29,815.00	\$1,067.41	June 21, 2024 [Dkt. No. 549]	\$29,815.00	\$1,067.41
July 11, 2024 [Dkt. No. 659]	May 1, 2024 through May 31, 2024	\$74,030.00	\$7,440.76	July 25, 2024 [Dkt. No. 717]	\$74,030.00	\$7,440.76
August 9, 2024 [Dkt. No. 744]	June 1, 2024 through June 30, 2024	\$174,680.00	\$11,137.35	August 26, 2024 [Dkt. No. 787]	\$174,680.00	\$11,137.35
September 16, 2024 [Dkt. No. 835]	July 1, 2024 through July 31, 2024	\$121,335.00	\$6,961.91	October 9, 2024 [Dkt. No. 902]	\$121,335.00	\$6,961.91
October 28, 2024 [Dkt. No. 951]	August 1, 2024 through August 31, 2024	\$139,780.00	\$6,834.46	November 13, 2024 [Dkt. No. 998]	\$139,780.00	\$6,834.46
October 31, 2024 [Dkt. No. 965]	September 1, 2024 through September 30, 2024	\$122,985.00	\$9,113.69	November 15, 2024 [Dkt. No. 1018]	\$122,985.00	\$9,113.69
December 20, 2024 [Dkt. No. 1110]	October 1, 2024 through October 31, 2024	\$136,515.00	\$10,940.18	January 6, 2025 [Dkt. No. 1158]	\$136,515.00	\$10,940.18
December 27, 2024 [Dkt. No. 1130]	November 1, 2024 through November 30, 2024	\$109,875.00	\$8,049.52	January 14, 2025 [Dkt. No. 1186]	\$109,875.00	\$8,049.52
February 11, 2025 [Dkt. No. 1252]	December 1, 2024 through December 31, 2024	\$79,645.00	\$5,659.47	February 27, 2025 [Dkt. No. 1294]	\$79,645.00	\$5,659.47

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%)
March 17, 2025 [Dkt. No. 1342]	January 1, 2025 through January 31, 2025	\$45,627.50	\$1,907.61	April 2, 2025 [Dkt. No. 1374]	\$36,502.00	\$1,907.61
April 11, 2025 [Dkt. No. 1384]	February 1, 2025 through February 28, 2025	\$14,882.50	\$0.00	May 7, 2025 [Dkt. No. 1557]	\$11,906.00	0.00
May 14, 2025 [Dkt. No. 1573]	March 1, 2025 through March 31, 2025	\$3,517.50	\$0.00	N/A	N/A	N/A
TOTALS:		\$1,052,687.50	\$69,112.36		\$908,145.00	\$35,349.50

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
Case Administration	11.90	\$6,247.50	0.00	\$0.00	1.70	\$892.50	13.60	\$7,140.00
Data Analysis	25.10	\$11,947.50	2.70	\$1,417.50	2.40	\$1,260.00	30.20	\$14,625.00
Fee/Employment Application	0.00	\$0.00	0.00	\$0.00	0.00	\$0.00	0.00	\$0.00
Report Preparation	46.20	\$21,815.00	26.40	\$13,465.00	2.60	\$1,365.00	75.20	\$36,645.00
Travel Time ¹	12.10	\$5,617.50	0.00	\$0.00	0.00	\$0.00	12.10	\$5,617.50
TOTAL:	95.30	\$45,627.50	29.10	\$14,882.50	6.70	\$3,517.50	131.10	\$64,027.50

¹ Non-working travel billed at 50%.

Timekeeper Summary for Fourth Interim Compensation Period

Timekeeper	Position	2025 Rate	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
Suzanne Koenig	President & CEO	\$525.00	22.30	\$11,707.50	21.20	\$11,130.00	6.70	\$3,517.50	50.20	\$26,355.00
Jennifer Meyerowitz	General Counsel	\$525.00	0.40	\$210.00	0.00	\$0.00	0.00	\$0.00	0.40	\$210.00
Keith Hufsey	Vice President of Clinical and Regulatory Operations	\$475.00	42.10	\$19,997.50	0.40	\$190.00	0.00	\$0.00	42.50	\$20,187.50
Richard S. Snider	Chief Strategy Officer	\$475.00	15.00	\$7,125.00	7.50	\$3,562.50	0.00	\$0.00	22.50	\$10,687.50
Jude Langan	Regional Director of Operations	\$425.00	15.50	\$6,587.50	0.00	\$0.00	0.00	\$0.00	15.50	\$6,587.50
TOTAL			95.30	\$46,627.50	29.10	\$14,882.50	6.70	\$3,517.50	131.10	\$64,027.50

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.	\$0.00	\$0.00	\$0.00	\$0.00
h) Other Research Title searches, UCC searches, Asset searches, Accurant.	\$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	\$1,454.96	\$0.00	\$0.00	\$1,454.96
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	\$95.69	\$0.00	\$0.00	\$95.69
n) Other (specify) – Hotel	\$356.96	\$0.00	\$0.00	\$356.96
DISBURSEMENTS TOTAL	\$1,907.61	\$0.00	\$0.00	\$1,907.61

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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 JANUARY 1, 2025 THROUGH MARCH 31, 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 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 \$64,027.50 and reimbursement of expenses in the amount \$1,907.61 for the period of January 1, 2025 through March 31, 2025 (the “Interim Compensation Period”), and in support thereof, SAK respectfully represents as follows:

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.

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).

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 (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.

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 SAK

12. During this Interim Compensation Period, SAK, in its capacity as medical operations advisors for the Ombudsman, devoted substantial time regarding the following:

a. Case Administration

Hours: 13.60 Fees: \$7,140.00

This category includes services related to the general administration of these cases, including, without limitation, maintaining a case calendar, attending teleconference calls regarding facility status, resident care and record retention and disposal issues, and conferring with the Debtors’ representatives and the Ombudsman’s counsel on status of the cases. This category also includes services related to reviewing the ombudsman guidelines and upcoming deadlines. Throughout the Interim Compensation Period, SAK has sought and obtained information from, and assured open lines of communications with, the Debtors to assure that information flows in an efficient and effective manner due to the large number of facilities operated by the Debtors. Specifically, the Ombudsman and her representatives have continued to be in contact with members of the Debtors’ senior management team to discuss the Ombudsman’s oversight and secure a cooperative approach to the required work. The Ombudsman has monitored facility and

record management issues to ensure resident and patient interests and rights are protected and that state and federal regulations are being adhered to as site visits wind down and the Debtors shift toward record and plan considerations.

b. Data Analysis

Hours: 30.20 Fees: \$14,625.00

This category includes services related to time spent preparing for and visiting many facilities, reviewing state and local guidelines regarding public health, fire safety and emergency preparedness, coordinating visits with the Debtors' employees, reviewing the facilities' policies and generally observing resident care at each facility. Where identified, the Ombudsman and her representatives identified any concerns with the management of the Debtors. The Ombudsman and her representatives also recorded information gathered from site visits as well as license status issues.

c. Report Preparation

Hours: 75.20 Fees: \$36,645.00

This category includes services related to drafting, reviewing, revising and finalizing site visit reports. During the Interim Compensation Period, the Debtors had not yet completely effectuated the transfer of its licenses to the new buyers or their operators. During this transitional period, the Ombudsman and her representatives continued to conduct visits, so long as the facilities continued to be operating under the Debtors' licenses. With respect to each of the facilities visited, at the conclusion of each visit the Ombudsman's representatives draft a report, summarizing observations from the visit, related to the facility's day-to-day operations and patient care. For example, each facility report contains observations related to, inter alia, the facility's compliance with the appropriate state's long term care facility regulations, resident treatment (which includes

resident interview(s)), clinical and staffing services, emergency preparedness, and resident trust funds. The Ombudsman and her representatives carefully reviewed and revised each facility report after the initial draft to make available to parties-in-interest.

d. Travel Time

Hours: 12.10 Fees: \$5,617.50

This category includes services related to non-working travel related to visiting facilities. The Ombudsman and her representatives worked during travel whenever possible, but this was not often possible due to the travel constraints and necessities to visit each facility that required automotive travel. Finally, SAK billed all non-working travel time by half of its standard hourly rates.

MONTHLY FEE APPLICATIONS

13. On March 17, 2025, SAK filed its tenth monthly application for compensation and reimbursement of expenses [D.I. 1342] (the “Tenth Monthly Application”). By the Tenth Monthly Application, SAK sought approval of compensation of \$45,627.50 and reimbursement of expenses in the amount of \$1,907.61 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, SAK filed a certificate of no objection to the Tenth Monthly Application [D.I. 1374].

14. On April 11, 2025, SAK filed its eleventh monthly application for compensation and reimbursement of expenses [D.I. 1384] (the “Eleventh Monthly Application”). By the Eleventh Monthly Application, SAK sought approval of compensation of \$14,882.50 and reimbursement of expenses in the amount of \$0.00 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, SAK filed a certificate of no objection to the Eleventh Monthly Application [D.I. 1557].

15. On May 14, 2025, SAK filed its twelfth monthly application for compensation and reimbursement of expenses [D.I. 1573] (the “Twelfth Monthly Application”). By the Twelfth Monthly Application, SAK sought approval of compensation of \$3,517.50 and reimbursement of expenses in the amount of \$0.00 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 SAK for professional services rendered on behalf of the Ombudsman during the Interim Compensation Period is \$64,027.50. 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**. SAK submits that the professional services it rendered on behalf of the Ombudsman during this time were both reasonable and necessary.

17. SAK incurred \$1,907.61 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. Professionals of SAK have expended a total of 131.10 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

SAK's normal hourly rates of compensation for work of this character. The reasonable value of the services rendered by SAK for the Interim Compensation Period as counsel for the Ombudsman in these cases is \$64,027.50.

21. 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.

22. 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. Accordingly, by this Application, SAK requests that the Court allow and approve payment of one hundred (100%) of the fees and expenses incurred by SAK 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. SAK 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, SAK respectfully requests pursuant to the procedures allowed in the Interim Compensation Order: (i) approval of allowance of interim compensation for necessary and valuable medical advisor services rendered by SAK to the Ombudsman in the sum of \$64,027.50 and reimbursement of expenses in the sum of \$1,907.61 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)
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

-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
Facsimile: (973) 538-5146
Email: rmschechter@pbnlaw.com
Email: cpmazza@pbnlaw.com
Counsel for the Patient Care Ombudsman

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

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

Debtors.

Chapter 11

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(Jointly Administered)

Obj. Deadline: June 4, 2025 at 4:00 p.m.
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**DECLARATION OF SUZANNE KOENIG IN SUPPORT OF THE FOURTH INTERIM
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 JANUARY 1, 2025 THROUGH MARCH 31, 2025**

I, Suzanne Koenig, under penalty of perjury, declare as follows:

1. I am the Founder and Chief Executive Officer of SAK Management Services, LLC d/b/a SAK Healthcare ("SAK"), and am the Court appointed patient care ombudsman (the "Ombudsman").

2. I have read the foregoing *Fourth Interim 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 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

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performed many of the services rendered by SAK and am thoroughly familiar with all other work performed on behalf of the Ombudsman by the professionals in SAK.

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 SAK 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/ Suzanne Koenig
Suzanne Koenig

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
Case Administration	11.90	\$6,247.50	0.00	\$0.00	1.70	\$892.50	13.60	\$7,140.00
Data Analysis	25.10	\$11,947.50	2.70	\$1,417.50	2.40	\$1,260.00	30.20	\$14,625.00
Fee/Employment Application	0.00	\$0.00	0.00	\$0.00	0.00	\$0.00	0.00	\$0.00
Report Preparation	46.20	\$21,815.00	26.40	\$13,465.00	2.60	\$1,365.00	75.20	\$36,645.00
Travel Time ¹	12.10	\$5,617.50	0.00	\$0.00	0.00	\$0.00	12.10	\$5,617.50
TOTAL:	95.30	\$45,627.50	29.10	\$14,882.50	6.70	\$3,517.50	131.10	\$64,027.50

¹ Non-working travel billed at 50%.

Timekeeper Summary for Fourth Interim Compensation Period

Timekeeper	Position	2025 Rate	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
Suzanne Koenig	President & CEO	\$525.00	22.30	\$11,707.50	21.20	\$11,130.00	6.70	\$3,517.50	50.20	\$26,355.00
Jennifer Meyerowitz	General Counsel	\$525.00	0.40	\$210.00	0.00	\$0.00	0.00	\$0.00	0.40	\$210.00
Keith Hufsey	Vice President of Clinical and Regulatory Operations	\$475.00	42.10	\$19,997.50	0.40	\$190.00	0.00	\$0.00	42.50	\$20,187.50
Richard S. Snider	Chief Strategy Officer	\$475.00	15.00	\$7,125.00	7.50	\$3,562.50	0.00	\$0.00	22.50	\$10,687.50
Jude Langan	Regional Director of Operations	\$425.00	15.50	\$6,587.50	0.00	\$0.00	0.00	\$0.00	15.50	\$6,587.50
TOTAL			95.30	\$46,627.50	29.10	\$14,882.50	6.70	\$3,517.50	131.10	\$64,027.50

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
o) Filing/Court Fees Payable to Clerk of Court. (Admission Fees)	\$0.00	\$0.00	\$0.00	\$0.00
p) Computer Assisted Legal Research Westlaw, Lexis and a description of manner calculated.	\$0.00	\$0.00	\$0.00	\$0.00
q) Pacer Fees Payable to the Pacer Service Center for search and/or print.	\$0.00	\$0.00	\$0.00	\$0.00
r) Fax (with rates) No. of Pages ____ Rate per Page ____ (Max. \$1.00/pg.)	\$0.00	\$0.00	\$0.00	\$0.00
s) Case Specific Telephone / Conference Call Charges Exclusive of overhead charges. Court Appearances	\$0.00	\$0.00	\$0.00	\$0.00
t) In-House Reproduction Services Exclusive of overhead charges.	\$0.00	\$0.00	\$0.00	\$0.00
u) Outside Reproduction Services Including scanning services.	\$0.00	\$0.00	\$0.00	\$0.00
v) Other Research Title searches, UCC searches, Asset searches, Accurant.	\$0.00	\$0.00	\$0.00	\$0.00
w) Court Reporting / Deposition Services Transcripts.	\$0.00	\$0.00	\$0.00	\$0.00
x) Travel Mileage, rolls, airfare and parking	\$1,454.96	\$0.00	\$0.00	\$1,454.96
y) Courier & Express Carriers Overnight and personal delivery	\$0.00	\$0.00	\$0.00	\$0.00
z) Postage	\$0.00	\$0.00	\$0.00	\$0.00
aa) Other (specify) – Business Meals	\$95.69	\$0.00	\$0.00	\$95.69
bb) Other (specify) – Hotel	\$356.96	\$0.00	\$0.00	\$356.96
DISBURSEMENTS TOTAL	\$1,907.61	\$0.00	\$0.00	\$1,907.61

**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 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 JANUARY 1, 2025 THROUGH MARCH 31, 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”), 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 \$64,027.50 and reimbursement of expenses in the amount of \$1,907.61 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) on 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.

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
E-mail: rmschechter@pbnlaw.com
E-mail: cpmazza@pbnlaw.com

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 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 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.*
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

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

Counsel to Column Financial, Inc.

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

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*