

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

In re:

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

Chapter 11

Case No. 24-10443 (TMH)

Jointly Administered

**SUPPLEMENT TO FOURTH INTERIM FEE REQUEST OF
YOUNG CONAWAY STARGATT & TAYLOR, LLP**

Young Conaway Stargatt & Taylor, LLP (“Young Conaway”), co-counsel to the above-captioned debtors and debtors in possession (collectively, the “Debtors”), hereby supplements the *Fourth Interim Fee Request of Young Conaway Stargatt & Taylor, LLP* (the “Fourth Interim Application”) for the period from January 1, 2025, through and including March 31, 2025 (the “Application Period”) by attaching, as **Exhibits A** through **E** hereto, certain schedules requested by the *Appendix B Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under United States Code by Attorneys in Larger Chapter 11 Cases* (the “UST Guidelines”). In addition, Young Conaway respectfully states as follows to address the questions set forth under section C.5 of the UST Guidelines:

- a. During the Application Period, Young Conaway did not agree to any variations from, or alternatives to, its standard or customary billing rates, fees, or terms.
- b. The fees sought by Young Conaway in the Fourth Interim Application are less than 10% higher than the fees budgeted in the budget provided by Young Conaway to the Debtors for Application Period.

¹ The last four digits of SC Healthcare Holding, LLC’s tax identification number are 2584. The mailing address for SC Healthcare Holding, LLC is c/o Petersen Health Care Management, LLC P.O. Box 620, Delavan, IL 61734. 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 <http://www.kccllc.net/Petersen>.



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- c. The professionals included in the Fourth Interim Application did not vary their hourly rate based on the geographic location of the bankruptcy cases.
- d. The Fourth Interim Application did not include any fees dedicated to revising time records or preparing and revising invoices that would not normally be compensable outside of bankruptcy.
- e. The time period covered by the Fourth Interim Application includes approximately 0.90 hours with a value of \$1,166.00 spent by Young Conaway to ensure that the time entries subject to the Fourth Interim Application comply with the Local Rules of the United States Bankruptcy Court for the District of Delaware and do not disclose privileged or confidential information. This review and any revisions associated therewith are a necessary component of Young Conaway's preparation of each monthly fee application.
- f. The Fourth Interim Application did not include any rate increases since the effective date of the Court's approval of Young Conaway's retention.

Dated: May 15, 2025
Wilmington, Delaware

Respectfully submitted,

**YOUNG CONAWAY STARGATT &
TAYLOR, LLP**

/s/ Andrew L. Magaziner

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EXHIBIT A**CUSTOMARY AND COMPARABLE
COMPENSATION DISCLOSURES**

Young Conaway's hourly rates for bankruptcy services are comparable to the hourly rates charged in complex chapter 11 cases by similarly skilled bankruptcy attorneys. In addition, Young Conaway's hourly rates for bankruptcy services are comparable to the rates charged by the Firm for other complex corporate and litigation matters. The rates charged by the Firm for the services performed in the prior calendar year in the practice areas that are comparable to the services performed by the Bankruptcy and Corporate Restructuring section – namely, Corporate Counseling and Litigation, Business Planning, and Intellectual Property Litigation -are set forth below. Also included below is 2024 blended hourly rate information for all sections of the Firm, excluding the Bankruptcy and Corporate Restructuring section and the Personal Injury and Workers' Compensation section.

Category of Timekeeper	Blended Hourly Rate		
	Billed In comparable practice areas for preceding calendar year ¹	Billed Firm-wide for preceding calendar year ²	Billed This Application
Partner	\$971	\$998	\$1,060
Counsel	\$773	\$685	N/A
Associate	\$551	\$542	\$591
Paralegal	\$359	\$235	\$395
Aggregated:	\$715	\$705	\$703

¹ This column reflects the blended 2024 rates charged by the firm for complex corporate and litigation matters in the following sections of the firm: Corporate Counseling and Litigation, Business Planning, and Intellectual Property Litigation.

² This column excludes blended hourly rates for the Bankruptcy and Corporate Restructuring section and the Personal Injury and Workers' Compensation section.

EXHIBIT B**SUMMARY OF TIMEKEEPERS INCLUDED IN THE
FOURTH INTERIM APPLICATION**

Name	Title	Department	Date of First Admission	Fees Billed in the Application Period (\$)	Hours Billed in the Application Period	Hourly Rate Billed in the Application Period (\$)
Andrew L. Magaziner	Partner	Bankruptcy	2010	\$88,298.00	83.30	\$1,060.00
Shella Borovinskaya	Associate	Bankruptcy	2021	\$18,757.50	30.50	\$615.00
Carol E. Thompson	Associate	Bankruptcy	2022	\$39,486.00	68.70	\$580.00
Debbie Laskin	Paralegal	Bankruptcy		\$22,910.00	58.00	\$395.00
Beth Olivere	Paralegal	Bankruptcy		\$924.00	2.40	\$385.00
Totals				\$170,375.50	242.90	

EXHIBIT C

BUDGET AND STAFFING PLAN

BUDGET		
JANUARY - MARCH - \$600,000.00		
Project Category	Estimated Hours	Estimated Fees
Case Administration (B001)	102.80	\$71,816.40
Court Hearings (B002)	137.10	\$95,755.20
Cash Collateral/DIP Financing (B003)	42.90	\$29,923.50
Schedules & Statements, U.S. Trustee Reports (B004)	51.40	\$35,908.20
Lease/Executory Contract Issues (B005)	17.10	\$11,969.40
Use, Sale or Lease of Property (363 issues) (B006)	120.00	\$85,315.80
Claims Analysis, Objections and Resolutions (B007)	17.10	\$11,969.40
Meetings (B008)	34.30	\$23,938.80
Stay Relief Matters (B009)	8.60	\$5,984.70
Reclamation Claims and Reclamation Adversaries (B010)	8.60	\$5,984.70
Other Adversary Proceedings (B011)	8.60	\$5,984.70
Plan and Disclosure Statement (B012)	68.60	\$47,877.60
Creditor Inquiries (B013)	8.60	\$5,984.70
General Corporate Matters (B014)	8.60	\$5,984.70
Employee Matters (B015)	17.10	\$11,969.40
Asset Analysis (B016)	8.60	\$5,984.70
Retention of Professionals/Fee Issues (B017)	145.70	\$101,739.90
Fee Application Preparation (B018)	25.70	\$17,954.10
Travel (B019)	8.60	\$5,984.70
Utility Services (B020)	17.10	\$11,969.40
Total	857.10	\$600,000.00

STAFFING PLAN		
Category of Timekeeper	Number of Timekeepers Expected to Work on the Matter During the Budgeted Period	Average Rate¹
Partner	1	\$1,060.00
Counsel	-	-
Associate (7 or more years since first admission)	-	-
Associate (4-6 years since first admission)	2	\$605.00
Associate (less than 4 years since first admission)	-	-
Paralegal	1	\$395.00

¹ The Average Hourly Rate is a weighted average based on the individual hourly rate of, and projected number of hours worked by, each timekeeper over the course of the Budgeted Period.

EXHIBIT D**SUMMARY OF COMPENSATION AND EXPENSE REIMBURSEMENT**

SUMMARY OF COMPENSATION BY PROJECT CATEGORY		
Project Category	Hours Billed	Fees Sought (\$)
Case Administration (B001)	18.70	\$13,533.50
Court Hearings (B002)	49.80	\$31,749.50
Cash Collateral/DIP Financing (B003)	0.80	\$848.00
Schedules & Statements, U.S. Trustee Reports (B004)	7.10	\$4,530.50
Lease/Executory Contract Issues (B005)	1.10	\$718.50
Use, Sale or Lease of Property (B006)	19.90	\$15,967.00
Claims Analysis, Objections & Resolutions (B007)	36.40	\$31,622.00
Meetings (B008)	7.20	\$5,297.00
Stay Relief Matters (B009)	6.40	\$5,323.00
Other Adversary Matters (B011)	11.70	\$6,958.50
Plan and Disclosure Statement (B012)	35.60	\$27,399.00
Creditor Inquiries (B013)	0.60	\$447.50
Retention of Professionals/Fee Issues (B017)	40.30	\$23,044.00
Fee Application Preparation (B018)	5.40	\$2,129.00
(B190)	1.90	\$1,168.50
Totals	242.90	\$170,735.50

SUMMARY OF EXPENSE REIMBURSEMENT	
	Amount (\$)
Delivery	\$97.00
Docket Retrieval	\$65.40
Reproduction	\$987.70
Working Meals	\$225.63
Total	\$1,375.73

EXHIBIT E

SUMMARY OF FOURTH INTERIM APPLICATION	
Name of Applicant	Young Conaway Stargatt & Taylor, LLP
Name of Client	Debtors and Debtors in Possession
Time period covered by Fourth Interim Application	January 1, 2025 – March 31, 2025
Total compensation sought during the Application Period	\$170,735.50
Total expenses sought during the Application Period	\$1,375.73
Petition Date	March 20, 2024
Retention Date	March 20, 2024
Date of order approving employment	April 23, 2024
Total compensation approved by interim order to date [D.I. 872, 1123, 1359]	\$1,107,012.00
Total expenses approved by interim order to date [D.I. 872, 1123, 1359]	\$27,575.45
Total allowed compensation paid to date	\$1,243,482.75
Total allowed expenses paid to date	\$29,067.43
Blended rate in the Fourth Interim Application for all attorneys	\$805.00
Blended rate in the Fourth Interim Application for all timekeepers	\$703.00
Compensation sought in the Fourth Interim Application already paid (or to be paid) pursuant to a monthly compensation order but not yet allowed (80%)	\$136,588.40
Expenses sought in the Fourth Interim Application already paid (or to be paid) pursuant to a monthly compensation order but not yet allowed (100%)	\$1,375.73
Number of professionals included in the Fourth Interim Application	5
If applicable, number of professionals in the Fourth Interim Application not included in staffing plan approved by client	N/A
If applicable, difference between fees budgeted and compensation sought during the Application Period	\$600,00.00 Budget Amount \$170,735.50 Amount Sought
Number of professionals billing fewer than 15 hours to the case during the Application Period	1
Are any rates higher than those approved or disclosed at retention?	No