

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

<b>In re:</b>  <b>SC HEALTHCARE HOLDING, LLC <i>et al.</i>,</b>  <b>Debtors.<sup>1</sup></b>	Chapter 11  Case No. 24-10443-(TMH)  (Jointly Administered)  <b>Obj. Deadline: June 10, 2025 at 4:00 p.m.</b> <b>Hearing Date: June 26, 2025 at 11:00 a.m.</b>
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**SUMMARY OF THE FOURTH INTERIM FEE APPLICATION FOR COMPENSATION  
AND REIMBURSEMENT OF EXPENSES OF PROVINCE, LLC, AS FINANCIAL  
ADVISOR TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR  
THE PERIOD FROM JANUARY 1, 2025 THROUGH MARCH 31, 2025**

Name of Applicant:	Province, LLC
Authorized to Provide Professional Services to:	The Official Committee of Unsecured Creditors
Date of Retention:	Effective as of April 11, 2024 by order entered on May 21, 2024
Period for which Compensation and Reimbursement is Sought:	January 1, 2025 through March 31, 2025 <sup>2</sup>
Amount of Compensation Sought as Actual, Reasonable and Necessary:	\$78,487.30
Amount of Expense Reimbursement Sought as Actual, Reasonable and Necessary:	\$24.47

This is a:      \_\_\_ monthly              X interim              \_\_\_ final application.

<sup>1</sup> The last four digits of SC Healthcare Holding, LLC's tax identification number are 2584. The mailing address for SC Healthcare Holding, LLC is c/o Petersen Health Care Management, LLC 830 West Trailcreek Dr., Peoria, IL 61614. Due to the large number of debtors in these Chapter 11 Cases, whose cases are being jointly administered, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information is available on a website of the Debtors' claims and noticing agent at [www.kccllc.net/Petersen](http://www.kccllc.net/Petersen).

<sup>2</sup> The applicant reserves the right to include any time expended in the time period indicated above in future application(s) if it is not included herein.



**MONTHLY FEE APPLICATIONS SUBJECT TO THIS APPLICATION**

<b>Date &amp; Docket No.</b>	<b>Filing Period</b>	<b>Requested Fees</b>	<b>Requested Expenses</b>	<b>Paid Fees</b>	<b>Paid Expenses</b>
3/14/2025 Doc 1330	January 1, 2025 - January 31, 2025	\$61,936.10	\$24.47	\$0.00	\$0.00
3/21/2025 Doc 1356	February 1, 2025 - February 28, 2025	\$11,565.10	\$0.00	\$0.00	\$0.00
5/1/2025 Doc 1539	March 1, 2025 - March 31, 2025	\$4,986.10	\$0.00	\$0.00	\$0.00
<b>Grand Total</b>		<b>\$78,487.30</b>	<b>\$24.47</b>	<b>\$0.00</b>	<b>\$0.00</b>

**PROVINCE PROFESSIONALS**

<b>Name of Professional Individual</b>	<b>Position of the Applicant, Number of Years in that Position, Prior Relevant Experience, Year of Obtaining License to Practice, Area of Expertise</b>	<b>Hourly Billing Rate</b>	<b>Total Hours Billed</b>	<b>Total Compensation</b>
Paul Navid	Partner - Financial restructuring and investment banking advisor.	\$950	32.0	\$30,400.00
Alex Torio	Associate - Investment banking.	\$500	12.0	\$6,000.00
Garo Khachikian	Associate - Corporate and Credit Banking.	\$490	80.8	\$39,592.00
Hunter Thompson	Senior Analyst	\$430	35.0	\$15,050.00
	<b>Subtotal</b>		<b>159.8</b>	<b>\$91,042.00</b>
<b>Blended Rate for Professionals</b>		<b>\$569.72</b>		
<b>Paraprofessionals</b>		<b>Hourly Billing Rate</b>	<b>Total Hours Billed</b>	<b>Total Compensation</b>
Laura Conn	Matter Administrator	\$270	4.8	\$1,296.00
	<b>Subtotal</b>		<b>4.8</b>	<b>\$1,296.00</b>
			<b>Fee Statement Hours</b>	<b>Total Compensation</b>
	<b>Subtotal</b>		<b>164.6</b>	<b>\$92,338.00</b>
<b>Blended Rate for all Timekeepers</b>		<b>\$560.98</b>		
<b>Voluntary Discount</b>				<b>(\$13,850.70)</b>
<b>Grand Total</b>			<b>164.6</b>	<b>\$78,487.30</b>

**COMPENSATION BY CATEGORY**

<b>Project Categories</b>	<b>Total Hours</b>	<b>Total Fees</b>
Business Analysis / Operations	74.4	\$41,460.00
Committee Activities	23.3	\$14,269.00
Court Filings	4.6	\$2,344.00
Fee/Employment Applications	5.0	\$1,394.00
Litigation	52.8	\$30,832.00
Plan and Disclosure Statement	4.5	\$2,039.00
<b>Subtotal</b>	<b>164.6</b>	<b>\$92,338.00</b>
<b>Voluntary Discount</b>		<b>(\$13,850.70)</b>
<b>Grant Total</b>	<b>164.6</b>	<b>\$78,487.30</b>

**EXPENSE SUMMARY**

<b>Expense Category</b>	<b>Description</b>	<b>Total Expenses</b>
Meals	Working meals.	\$24.47
<b>Total Expenses</b>		<b>\$24.47</b>

*[Remainder of Page Left Intentionally Blank]*

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

**In re:**

**SC HEALTHCARE HOLDING, LLC *et al.*,  
  
Debtors.<sup>1</sup>**

Chapter 11

Case No. 24-10443-(TMH)

(Jointly Administered)

**Obj. Deadline: June 10, 2025 at 4:00 p.m.**

**Hearing Date: June 26, 2025 at 11:00 a.m.**

**FOURTH INTERIM FEE APPLICATION FOR COMPENSATION  
AND REIMBURSEMENT OF EXPENSES OF PROVINCE, LLC,  
AS FINANCIAL ADVISOR TO THE OFFICIAL COMMITTEE  
OF UNSECURED CREDITORS FOR THE PERIOD FROM  
JANUARY 1, 2025 THROUGH MARCH 31, 2025**

Pursuant to sections 330 and 331 of Title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* (the “Administrative Order”), Province, LLC (“Province” or the “Firm”), financial advisor for the Official Committee of Unsecured Creditors (the “Committee”), hereby submits its fourth interim fee application for allowance of compensation for professional services rendered and expenses incurred as financial advisor to the Committee during the period from January 1, 2025 through March 31, 2025 (the “Application”), and in support thereof respectfully represents:

By this Application, Province seeks an interim allowance of compensation in the amount of \$78,487.30 and actual and necessary expenses in the amount of \$24.47 for a total allowance of

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<sup>1</sup> The last four digits of SC Healthcare Holding, LLC’s tax identification number are 2584. The mailing address for SC Healthcare Holding, LLC is c/o Petersen Health Care Management, LLC 830 West Trailcreek Dr., Peoria, IL 61614. Due to the large number of debtors in these Chapter 11 Cases, whose cases are being jointly administered, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information is available on a website of the Debtors’ claims and noticing agent at [www.kccllc.net/Petersen](http://www.kccllc.net/Petersen).

\$78,511.77 and payment of the unpaid portion of such fees and expenses for the period January 1, 2025 through March 31, 2025 (the “Fourth Interim Period”).

Pursuant to Local Bankruptcy Rule 2016-1, this Application is supported by the Certification of Paul Navid which is annexed hereto as Exhibit A. In support of this Application, Province respectfully represents as follows:

### **JURISDICTION AND VENUE**

1. The Court has jurisdiction over this Application pursuant to 28 U.S.C. § 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

2. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2) and may be determined by the Bankruptcy Court. Province confirms its consent, pursuant to Bankruptcy Rule 7008 and Local Rule 9013-1(f), to the entry of a final order or judgment by the Court in connection with this Application to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

3. The statutory predicates for the relief requested herein are sections 328, 330 and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rules 2014-1 and 2016-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”).

### **BACKGROUND**

4. On March 20, 2024 (the “Petition Date”), each of the above-captioned debtors and debtors in possession (collectively, the “Debtors”) filed a voluntary petition for relief in this Court

under chapter 11 of the Bankruptcy Code. The Debtors continue in possession of their properties and management of their businesses as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee or examiner has been requested or appointed in these Cases.

5. These cases are being jointly administered for procedural purposes only, pursuant to an order the Court entered on March 22, 2024 [Docket No. 79].

6. On April 9, 2024, the United States Trustee appointed the Committee pursuant to section 1102(a)(1) of the Bankruptcy Code [Docket No. 131]. The Committee currently comprises the following entities and persons: (i) Select Rehabilitation, LLC; (ii) Martin Brothers Distributing Company, Inc.; (iii) Omnicare Inc.; (iv) McKesson Corporation; (v) Onestaff Medical, LLC; (vi) Lawrence Recruiting Specialists, Inc.; and (vii) Darlena Moore, as Independent Administrator of the Estate of Linda I. Johnson.

7. On April 11, 2024, the Committee selected Province as its proposed financial advisor.

8. On April 23, 2024, the Court entered the Administrative Order, authorizing the Committee's professionals ("Professionals") to submit monthly applications for interim compensation and reimbursement of expenses, pursuant to the procedures specified therein. The Administrative Order provides, among other things, that a Professional may file monthly fee applications. If no objections are made within fourteen (14) days after service of the monthly fee application, the Debtors are authorized to pay the Professional eighty percent (80%) of the requested fees and one hundred percent (100%) of the requested expenses. At three-month intervals or such other intervals convenient to the Court, each Professional shall file and serve an interim application for allowance of the amounts sought in its monthly fee applications for that period. All fees and expenses paid are on an interim basis until final allowance by the Court.

9. The retention of Province, as financial advisor to the Committee, was approved effective as of April 11, 2024, by this Court's *Order Authorizing and Approving the Employment of Province, LLC as Financial Advisor to the Official Committee of Unsecured Creditors Effective as of April 11, 2024* [Docket No. 337], entered on May 21, 2024 (the "Retention Order"). The Retention Order authorized Province to be compensated on an hourly basis and to be reimbursed for actual and necessary out-of-pocket expenses.

**PROVINCE'S APPLICATION FOR COMPENSATION AND  
FOR REIMBURSEMENT OF EXPENSES**

**Monthly Fee Applications Covered Herein**

10. The Monthly Fee Applications of Province for the Period from January 1, 2025 through March 31, 2025 have been filed and served pursuant to the Administrative Order.

11. On March 14, 2025, Province filed its *Tenth Monthly Application for Compensation and Reimbursement of Expenses of Province, LLC as Financial Advisor to the Official Committee of Unsecured Creditors, for the Period from January 1, 2025 Through January 31, 2025* [Docket No. 1330] (the "Tenth Monthly Fee Application") requesting \$61,936.10 in fees and \$24.47 in expenses. A Certificate of No Objection was filed for the Tenth Monthly Fee Application on April 1, 2025 [Docket No. 1370].

12. On March 21, 2025, Province filed its *Eleventh Monthly Application for Compensation and Reimbursement of Expenses of Province, LLC as Financial Advisor to the Official Committee of Unsecured Creditors, for the Period from February 1, 2025 Through February 28, 2025* [Docket No. 1356] (the "Eleventh Monthly Fee Application") requesting \$11,565.10 in fees and \$0.00 in expenses. A Certificate of No Objection was filed for the Eleventh Monthly Fee Application on April 8, 2025 [Docket No. 1378].

13. On May 1, 2025, Province filed its *Twelfth Monthly Application for Compensation and Reimbursement of Expenses of Province, LLC as Financial Advisor to the Official Committee of Unsecured Creditors, for the Period from March 1, 2025 Through March 31, 2025* [Docket No. 1539] (the “Twelfth Monthly Fee Application”) requesting \$4,986.10 in fees and \$0.00 in expenses. A Certificate of No Objection was filed for the Twelfth Monthly Fee Application on May 19, 2025 [Docket No. 1588].

14. The Monthly Fee Applications, which have been incorporated as if set forth herein, contain the detailed daily time logs describing the actual and necessary services provided by Province during part of the Fourth Interim Period, as well as other detailed information required to be included in fee applications.

#### **REQUESTED RELIEF**

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

16. At all relevant times, Province has been a disinterested person as that term is defined in §101(14) of the Bankruptcy Code and has not represented or held an interest adverse to the interests of the Debtors.

17. All services for which Province requests compensation were performed for or on the behalf of the Committee.

18. Province has received no payment and no promises for payment from any source other than the estates for services rendered or to be rendered in any capacity whatsoever in connection with the matters covered by this Application. There is no agreement or understanding



between Province and any other person other than the employees of Province for the sharing of compensation to be received for services rendered in these cases.

19. The professional services and related expenses for which Province requests interim allowance of compensation and reimbursement of expenses were rendered and incurred in connection with this case in the discharge of Province's professional responsibilities as financial advisor for the Committee in these Chapter 11 cases. Province's services have been necessary and beneficial for the Committee in these Chapter 11 cases. Province's services have been necessary and beneficial to the Debtors and their estates, the Committee, creditors, and other parties in interest.

20. In accordance with the factors enumerated in §330 of the Bankruptcy Code, it is respectfully submitted that the amount requested by Province is fair and reasonable given (a) the complexity of these cases, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services, and (e) the cost of comparable services other than in a case under the Bankruptcy Code. Moreover, Province has reviewed the requirements of Del. Bankr. LR 2016-1 and the Administrative Order and believes that this Applications complies with such Rule and Order.

WHEREFORE, Province respectfully requests (i) approval of interim compensation in the amount of \$78,487.30 and reimbursement of actual and necessary expenses in the amount of \$24.47 for a total allowance of \$78,511.77; (ii) payment of the outstanding amount of such sums; and (iii) such other and further relief as this Court may deem just and proper.

*[Remainder of page intentionally left blank.]*

Dated: May 20, 2025

PROVINCE, LLC

By: /s/Paul Navid

Paul Navid, Partner

2360 Corporate Circle, Suite 340

Henderson, NV 89074

Telephone: 702.685.5555

Email: pnavid@provincefirm.com

*Financial Advisor to the Official Committee of  
Unsecured Creditors*

**EXHIBIT A**

**Certification**

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

**In re:**

**SC HEALTHCARE HOLDING, LLC *et al.*,  
  
Debtors.<sup>1</sup>**

Chapter 11

Case No. 24-10443-(TMH)

(Jointly Administered)

**CERTIFICATION OF PAUL NAVID**

Paul Navid, a Partner with the firm Province, after being duly sworn according to law, deposes and says:

1. I am a Partner with the firm of Province, LLC (“Province”), which is a financial advisory firm with its principal office located at 2360 Corporate Circle, Suite 340, Henderson, Nevada 89074. Province also has offices in the Los Angeles, Greenwich, New York, and Miami metro areas. Province was retained as financial advisor to the Official Committee of Unsecured Creditors (the “Committee”) on April 11, 2024 and Province’s employment application was approved by the Court on May 21, 2024.

2. I have personally performed many of the services rendered by Province as financial advisor to the Committee and am familiar with the other work performed on behalf of the Committee by the other professionals in the firm.

3. The *Fourth Interim Fee Application for Compensation and Reimbursement of Expenses of Province, LLC, as Financial Advisor to the Official Committee of Unsecured Creditors for the Period from January 1, 2025 Through March 31, 2025* (the “Application”) was

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prepared at my direction. The facts set forth in the foregoing Application are true to the best of my knowledge, information and belief.

4. Province's rates for the services rendered by its professionals in these chapter 11 cases are similar to the rates Province charges for professional services rendered in comparable bankruptcy and non-bankruptcy cases in a competitive national market for financial advisory services.

5. I have reviewed the Court's Local Rule 2016-1 and the United States Trustee's Guidelines for Review of Applications for Compensation and Reimbursement of Expenses Filed under 11 U.S.C. s.330 (the "Guidelines"). The Application substantially complies with Local Rule 2016-1 and the Guidelines.

Executed under penalty of perjury of the laws of the United States on this 20<sup>th</sup> day of May 2025.

/s/ Paul Navid  
Paul Navid, Partner  
Province, LLC

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

In re:

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

Debtors.<sup>1</sup>

Chapter 11

Case No. 24-10443 (TMH)

(Jointly Administered)

Ref Dkt. No. \_\_\_\_

**ORDER APPROVING FOURTH INTERIM FEE APPLICATION FOR  
COMPENSATION AND REIMBURSEMENT OF EXPENSES OF  
PROVINCE, LLC, AS FINANCIAL ADVISOR TO THE OFFICIAL  
COMMITTEE OF UNSECURED CREDITORS FOR THE PERIOD  
FROM JANUARY 1, 2025 THROUGH MARCH 31, 2025**

Upon consideration of the third interim application of Province, LLC (“**Province**”), financial advisor to the Official Committee of Unsecured Creditors of SC Healthcare Holding, LLC, *et al.* (the “**Committee**”), for compensation and reimbursement of expenses for the period from January 1, 2025 through March 31, 2025 (the “**Application**”); and this Court having determined that proper and adequate notice has been given and that no other or further notice is necessary; and any objections to the Application having been overruled or resolved; and after a hearing being held; and after due deliberation thereon; and good and sufficient cause appearing therefore, it is hereby

**ORDERED, ADJUDGED AND DECREED THAT:**

1. The Application is GRANTED.

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2. Province's fees of \$78,487.30 and \$24.47 as reimbursement of expenses for the period of January 1, 2025 through March 31, 2025, are allowed on an interim basis.

3. The Debtors are authorized to disburse to Province any unpaid portion of such allowed fees and expenses.

4. Province is hereby granted an administrative expense claim for all allowed amounts set forth herein and the Application.

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

In re:

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

Debtors.<sup>1</sup>

Chapter 11

Case No. 24-10443 (TMH)

(Jointly Administered)

**Obj. Deadline: June 10, 2025 at 4:00 p.m.**

**Hearing Date: June 26, 2025 at 11:00 a.m.**

**NOTICE OF INTERIM FEE APPLICATION**

**PLEASE TAKE NOTICE** that Province, LLC (the “**Applicant**”), financial advisor to the Official Committee of Unsecured Creditors of SC Healthcare Holding, LLC *et al.* (the “**Committee**”), caused to be filed the *Fourth Interim Fee Application for Compensation and Reimbursement of Expenses of Province, LLC as Financial Advisor to the Official Committee of Unsecured Creditors for the Period from January 1, 2025 through March 31, 2025* (the “**Application**”) with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 6th Floor, Wilmington, Delaware 19801. The Applicant is requesting allowance of fees in the amount of \$78,487.30 and expenses in the amount of \$24.47 for the period from January 1, 2025 to March 31, 2025.

**PLEASE TAKE FURTHER NOTICE THAT** any response or objection to the Application must be filed with the Court on, or prior to, **June 10, 2025 at 4:00 p.m. (Prevailing Eastern Time)** served upon: (a) the Debtors, 830 W. Trailcreek Drive, Peoria, IL 61614, Attn:

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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 Office of the United States 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 (petermann@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).

PLEASE TAKE FURTHER NOTICE THAT A HEARING WILL BE HELD ON THE APPLICATION ON **JUNE 26, 2025 AT 11:00 A.M. (Eastern Prevailing Time)** BEFORE THE HONORABLE THOMAS M. HORAN OF THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE.

[Signature page follows]

Dated: May 20, 2025  
Wilmington, Delaware

Respectfully submitted,

**GREENBERG TRAURIG, LLP**

/s/ Dennis A. Meloro

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- and -

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**COUNSEL FOR THE OFFICIAL COMMITTEE  
OF UNSECURED CREDITORS**