

**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 11, 2025 at 4:00 p.m.**

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

**SUMMARY OF FOURTH INTERIM FEE APPLICATION OF GREENBERG  
TRAURIG, LLP, COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED  
CREDITORS OF SC HEALTHCARE HOLDING, LLC *ET AL.* FOR ALLOWANCE OF  
COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF  
EXPENSES FOR THE PERIOD JANUARY 1, 2025 THROUGH MARCH 31, 2025**

Name of Applicant:	Greenberg Traurig, LLP
Authorized to Provide Professional Services to:	Official Committee of Unsecured Creditors
Date of Retention:	April 10, 2024
Period for Which Compensation and Reimbursement sought	Jan. 1, 2025 through Mar. 31, 2025 (Fourth Interim Period)
Total compensation sought this period	\$418,444.50 (before discount) <sup>2</sup> \$355,677.82 (after discount) <b>Total Discount: \$62,766.68</b>
Total expense reimbursement sought this period:	\$15,621.67
Total compensation allowed by interim order to date:	\$3,475,012.68
Total expenses allowed by interim order to date:	\$81,705.47
Total allowed compensation paid to date:	\$3,475,012.68

<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> As reflected in its retention application, Greenberg Traurig has agreed to give a 15% discount on its fees, except for non-working travel time.



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Total allowed expenses paid to date:	\$81,705.47
Blended rate in this application for all timekeepers:	\$1,228.91 (before discount) \$1,044.58 (after discount)
Blended rate in this application for all attorneys:	\$1,278.97 (before discount) \$1,087.12 (after discount)
Compensation sought in this application already paid pursuant to a monthly fee application but not yet allowed:	\$284,542.25
Expenses sought in this application already paid pursuant to a monthly fee application but not yet allowed:	\$15,621.67
Number of professionals included in this application:	12
If applicable, number of professionals in this application not included in staffing plan approved by client:	N/A
If applicable, difference between fees budgeted and compensation sought for this period:	N/A
Number of professionals billing fewer than 15 hours to the case during this period:	5
Are any rates higher than those approved and disclosed at retention? If yes, calculate and disclose the total compensation sought in this application using the rates originally disclosed in the retention application.	No

This is a(n): ☐ Monthly ☒ Interim ☐ Final Application

This Application does not include any hours incurred in connection with preparation of this Application.

**SUMMARY OF MONTHLY FEE APPLICATIONS  
FOR THE FOURTH INTERIM PERIOD**

<b>APPLICATION</b>	<b>FEES REQUESTED</b>	<b>EXPENSES REQUESTED</b>	<b>FEES APPROVED</b>	<b>EXPENSES APPROVED</b>	<b>TOTAL OWED</b>
Tenth Monthly 01/01/25 - 01/31/25 Docket No. 1331, Filed 03/14/25  Certificate of No Objection (“CNO”): Docket No. 1371, Filed 04/01/25	\$148,840.53	\$7,515.72	\$119,072.42	\$7,515.72	\$29,768.11
Eleventh Monthly 02/01/25 – 02/28/25 Docket No. 1357, Filed 03/21/25  CNO: Docket No. 1379, Filed 04/08/25	\$115,922.14	\$4,491.18	\$92,737.71	\$4,491.18	\$23,184.43
Twelfth Monthly 03/01/25 – 03/31/25 Docket No. 1540, Filed 05/01/25  CNO: Docket No. 1589, Filed May 19, 2025	\$90,915.15	\$3,614.77	\$72,732.12	\$3,614.77	\$18,183.03
<b>TOTALS:</b>	<b>\$355,677.82</b>	<b>\$15,621.67</b>	<b>\$284,542.25</b>	<b>\$15,621.67</b>	<b>\$71,135.57</b>

**COMPENSATION BY INDIVIDUAL**

<b>Name of Professional Person</b>	<b>Position of the Application; Date of Bar Admission; Area of Expertise</b>	<b>Hourly Billing Rate</b>	<b>Total Billed Hours</b>	<b>Total Compensation</b>
<b>Shareholders</b>				
Shari Heyen	Shareholder; Member of the Texas Bar since 1990; Area of Expertise: Bankruptcy	\$1,890	23.7	\$44,793.00
Nancy A. Peterman	Shareholder; Member of Illinois Bar since 1991; Member of the New York Bar since 2012. Area of Expertise: Bankruptcy.	\$1,835	53.7	\$98,539.50
Dennis A. Meloro	Shareholder; Member of Delaware Bar since 2003; Area of expertise: Bankruptcy.	\$1,625	39.0	\$63,375.00
Eric J. Howe	Shareholder; Member of Minnesota Bar since 2005; Area of expertise: Bankruptcy.	\$1,345	13.3	\$17,888.50
Danny Duerdoth	Shareholder; Member of the Illinois Bar since 2016; Area of expertise: Bankruptcy.	\$1,185	14.5	\$17,182.50
Martin Kedziora	Shareholder; Member of the Illinois Bar since 2009; Area of Expertise: Litigation.	\$1,050	20.6	\$21,630.00

<b>Name of Professional Person</b>	<b>Position of the Application; Date of Bar Admission; Area of Expertise</b>	<b>Hourly Billing Rate</b>	<b>Total Billed Hours</b>	<b>Total Compensation</b>
Danielle S. Kemp	Shareholder; Member of the Florida Bar since 2000; Area of Expertise: Bankruptcy.	\$950	142.00	\$134,900.00
<b>Associates</b>				
Tyler Salway	Associate; Member of the Illinois Bar since 2018; Area of Expertise: Litigation.	\$960	5.6	\$5,376.00
Kristen Jacobson	Associate; Member of the Texas Bar since 2017; Area of Expertise: Bankruptcy.	\$1000	4.5	\$4,500.00
Emily Nasir	Associate; Member of the Texas Bar since 2020; Area of Expertise: Bankruptcy	\$900	7.6	\$6,840.00
<b>Law Clerk</b>				
Clayton Kovich	Law Clerk; joined the firm in 2024	\$450	3.4	\$1,530.00
<b>Paralegals</b>				
Carla Greenberg	Paralegal; joined the firm in 2001.	\$150	12.6	\$1,890.00
<b>Total:</b>				\$418,444.50
<b>Discount:</b>				\$62,766.66
<b>Grand Total (after discount):</b>				\$355,677.84
<b>Blended Rate for Shareholders:</b>				\$1,298.27
<b>Blended Rate for Associates:</b>				\$944.41
<b>Blended Rate for Paralegals:</b>				\$150.00

**COMPENSATION BY PROJECT CATEGORY**

<b>Task Code</b>	<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
804	Case Administration	15.3	\$ 22,814.50
805	Claims Administration & Objections	3.9	\$ 6,954.00
807	Stay Relief	2.3	\$ 3,478.50
810	Litigation Matters	193.9	\$ 228,185.50
812	Plan and Disclosure Statement	23.5	\$ 36,149.00
813	Fee/Employment Applications	37.6	\$ 34,851.00
831	Creditors' Committee – General	17.5	\$ 29,915.00
832	Creditor Inquiries	0.7	\$ 1,323.00
833	Court Hearings	42.9	\$ 50,815.00
838	Sale of Property	2.9	\$ 3,959.00
<b>Totals</b>		<b>340.5</b>	<b>\$418,444.50 (before discount)</b>

**EXPENSE SUMMARY**

<b>Expense Category</b>	<b>Total Expenses</b>
GT Imaging	\$9,515.50
Messenger/Courier Services	\$30.00
Travel	\$853.04
Transcript	\$3,475.00
Information and Research	\$1,648.33
Professional & Legal	\$487.86
UPS Charges	\$71.94
Subpoenas Credit	\$(460.00)
<b>Total Disbursements:</b>	<b>\$15,621.67</b>

**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 11, 2025 at 4:00 p.m.**

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

**FOURTH INTERIM FEE APPLICATION OF GREENBERG TRAURIG, LLP,  
COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
OF SC HEALTHCARE HOLDING, LLC *ET AL.* FOR ALLOWANCE OF  
COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF  
EXPENSES FOR THE PERIOD JANUARY 1, 2025 THROUGH MARCH 31, 2025**

Greenberg Traurig, LLP (“**Greenberg Traurig**”), counsel to the Official Committee of Unsecured Creditors (the “**Committee**”), hereby submits its fourth interim application (the “**Application**”) for compensation and reimbursement of expenses for the period from January 1, 2025 through and including March 31, 2025 (the “**Application Period**”) pursuant to 11 U.S.C. §§ 330 and 331 (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of Bankruptcy Procedure, Rule 2016-2 of the Local Rules of Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “**Local Rules**”), and this Court’s *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket No. 235] (the “**Interim Compensation Order**”).

By this Application, Greenberg Traurig seeks an interim allowance of compensation in the amount of \$355,677.82 (reflecting a reduction of \$62,766.68 from \$418,444.50) and

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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).

reimbursement of actual expenses in the amount of \$15,621.67 for an aggregate total of \$371,299.49 in accordance with the Interim Compensation Order. In support of the Application, Greenberg Traurig respectfully represents as follows:

**BACKGROUND**

1. On March 20, 2024 (the “**Petition Date**”), each of the Debtors filed a voluntary petition for relief 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.

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

3. On April 9, 2024, the United States Trustee for the District of Delaware appointed the Committee pursuant to section 1102(a)(1) of the Bankruptcy Code [Docket No. 131]. On April 10, 2024, the Committee met, organized and selected Greenberg Traurig as its proposed counsel.

4. On April 23, 2024, the Court entered the Interim Compensation Order

5. On May 1, 2024, the Committee filed the *Application of the Official Committee of Unsecured Creditors of SC Healthcare Holding, LLC, et al. for Entry of an Order Authorizing the Employment and Retention of Greenberg Traurig, LLP as Lead Counsel Nunc Pro Tunc to April 10, 2024* [Docket No. 263].

6. On May 21, 2024, the Court entered an order authorizing the employment and retention of Greenberg Traurig *nunc pro tunc* to April 10, 2024 [Docket No. 338].

7. On March 14, 2025, Greenberg Traurig filed the *Tenth Monthly Fee Application of Greenberg Traurig, LLP, Counsel to the Official Committee of Unsecured Creditors of SC Healthcare Holding, LLC, et al. for Allowance of Compensation for Services Rendered and*

*Reimbursement of Expenses of the Period from January 1, 2025 Through January 31, 2025* [Docket No. 1331] (“**Tenth Monthly Fee Application**”). On April 1, 2025, following the expiration of the 14-day objection period, Greenberg Traurig filed the *Certificate of No Objection to Tenth Monthly Fee Application of Greenberg Traurig, LLP, Counsel to the Official Committee of Unsecured Creditors of SC Healthcare Holding, LLC et al. for Allowance of Compensation for Services Rendered and Reimbursement of Expenses for the Period from January 1, 2025 Through January 31, 2025* [Docket No. 1371].

8. On March 21, 2025, Greenberg Traurig filed the *Eleventh Monthly Fee Application of Greenberg Traurig, LLP, Counsel to the Official Committee of Unsecured Creditors of SC Healthcare Holding, LLC et al. for Allowance of Compensation for Services Rendered and Reimbursement of Expenses for the Period from February 1, 2025 Through February 28, 2025* [Docket No. 1357] (“**Eleventh Monthly Fee Application**”). On April 8, 2025, following the expiration of the 14-day objection period, Greenberg Traurig filed the *Certificate of No Objection to Eleventh Monthly Fee Application of Greenberg Traurig, LLP, Counsel to the Official Committee of Unsecured Creditors of SC Healthcare Holding, LLC et al. for Allowance of Compensation for Services Rendered and Reimbursement of Expenses for the Period from February 1, 2025 Through February 28, 2025* [Docket No. 1379].

9. On May 1, 2025, Greenberg Traurig filed the *Twelfth Monthly Fee Application of Greenberg Traurig, LLP, Counsel to the Official Committee of Unsecured Creditors of SC Healthcare Holding, LLC et al. For Allowance of Compensation for Services Rendered and Reimbursement of Expenses for the Period from March 1, 2025 Through March 31, 2025* [Docket No. 1540] (“**Twelfth Monthly Fee Application**”). On May 19, 2025, following the expiration of the 14-day objection period, Greenberg Traurig filed the *Certificate of No Objection to Twelfth Monthly Fee Application of Greenberg Traurig, LLP, Counsel to the Official Committee of*

*Unsecured Creditors of SC Healthcare Holding, LLC et al. for Allowance of Compensation for Services Rendered and Reimbursement of Expenses for the Period from March 1, 2025 Through March 31, 2025 [Docket No. 1589].*

10. Greenberg Traurig responds to the following questions raised in the *U.S. Trustee Program's Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330 for Attorneys in Larger Chapter 11 Cases*:

Question	Yes	No	Additional Explanation or Clarification
Did Greenberg Traurig agree to any variations from, or alternatives to, Greenberg Traurig's standard or customary billing rates, fees or terms for services pertaining to this engagement that were provided during the application period? If so, please explain.	X		Yes, Greenberg Traurig agreed to a 15% reduction in fees except for time spent for non-working travel.
If the fees sought in this Application as compared to the fees budgeted for the time period covered by the Interim Fee Application are higher by 10% or more, did Greenberg Traurig discuss the reasons for the variation with the client?		X	N/A
Have any of the professionals included in this Application varied their hourly rate based on geographic location of the bankruptcy case?		X	N/A
Does this Application include time for fees related to reviewing or revising time records or preparing, reviewing or revising invoices?		X	N/A
Does this Application include time for fees for reviewing time records to redact any privileged or other confidential information? If so, please quantify hours and fees.		X	N/A
Does this Application include any rate increases since retention in these cases?		X	N/A

#### **COMPENSATION PAID AND ITS SOURCE**

11. All services performed during the Application Period for which Greenberg Traurig is requesting compensation were performed for or on behalf of the Committee.

12. As of the date of this Application, Greenberg Traurig has not received any payment or any promise of payment for the services rendered from anyone in any capacity, nor is there an agreement in place between Greenberg Traurig and any person or otherwise in connection with the matters in this Application.

### **SUMMARY OF SERVICES RENDERED**

13. This Application is the fourth interim fee application filed by Greenberg Traurig in these chapter 11 cases. In connection with the professional services described below, by this Application, Greenberg Traurig seeks compensation in the amount of \$355,677.82 (reflecting a reduction of \$62,766.68 from \$418,444.50) for the Application Period.

14. The majority of services rendered by Greenberg Traurig during the Application Period as counsel to the Committee are summarized below. Moreover, each of the following are set forth in the invoices attached as exhibits to the Tenth, Eleventh and Twelfth Monthly Fee Applications [Docket Nos. 1331-1, 1357-1 and 1540-1, respectively], which include: (i) a description of the Professional performing the services; (ii) the date the services were performed; (iii) a detailed description of the nature of the services and the related time expended; and (iv) a summary of the fees and hours of each Professional listed by project category (which applicable categories are set forth below). Summarily, Greenberg Traurig rendered the following services during the Application Period as counsel to the Committee:

a) **Case Administration** (804)

Fees: \$22,814.50      Hours: 15.3

This category includes services related to the general administration of these cases, including without limitation, general discussions with Debtors' counsel and other professionals involved in the cases, maintaining a case calendar, coordinating workstreams between the Committee's professionals, and analyzing certain case-related issues.

b) Claims Administration & Objections (805)

Fees: \$6,954.00 Hours: 3.9

This category includes services related to reviewing and analyzing Martin Brothers' motion for allowance of administrative expense claim and related filings.

c) Stay Relief (807)

Fees: \$3,478.50 Hours: 2.3

This category includes services related to reviewing various motions and orders for relief from the automatic stay, including Mark Petersen's motion and corresponding objections thereto, and reviewing a stipulation in regard to Mark Petersen's motion.

d) Litigation Matters (810)

Fees: \$228,185.50 Hours: 193.9

The services described in this category involve extensive legal work related to litigation and settlement strategy.

This category includes services related to drafting and revising subpoenas, developing a chart of potential preference and fraudulent transfer claims against various parties, assessing discovery strategy regarding Mark Petersen's motions, strategizing potential settlement options with GMF, reviewing documents produced by the Debtors regarding payment of funds, drafting written discovery requests to be served onto Mark Petersen, reviewing Community State bank documents, revising the proposed stipulation regarding Mark Petersen's administrative claim motion, conferring with counsel for Mark Petersen regarding discovery issues, and drafting witness and exhibit lists.

Additional services Greenberg Traurig provided included assessing potential settlement options with GMF, Column and Mark Petersen, drafting a complaint against Mark Petersen, reviewing documents provided by PNC Bank and Community State Bank, conferring with counsel for GMF, Column and Mark Petersen regarding various discovery issues and related settlement

options, revising a rule 9019 motion regarding the Column settlement, and continuing to develop causes of action against litigation targets. Additionally, Greenberg Traurig reviewed and revised declarations regarding Mark Petersen's motions to dismiss, researched case law regarding Mark Petersen's motions to dismiss, strategized for upcoming mediation and drafted the Committee's mediation statement.

e) Plan & Disclosure Statement (812)

Fees: \$36,149.00 Hours: 23.5

This category includes services related to reviewing plan issues and considering settlement options for the plan process, including settlement options with Column. Other services include reviewing and revising the combined plan and disclosure statement and conferring with Debtors' counsel regarding plan issues.

f) Fee/Employment Applications (813)

Fees: \$34,851.00 Hours: 37.6

This category includes services related to drafting, revising and filing Greenberg Traurig's tenth, eleventh, and twelfth monthly fee applications and third interim fee application, drafting and filing a certificate of no objection for Greenberg Traurig's ninth and tenth monthly fee applications, drafting, revising and filing Province, LLC's ("**Province**") tenth and eleventh monthly fee applications, and drafting, revising and filing Province's third interim fee application.

g) Creditors' Committee – General (831)

Fees: \$29,915.00 Hours: 17.5

This category includes services related to communicating with the Committee regarding various case related matters.

h) Creditor Inquiries (832)

Fees: \$1,323.00 Hours: 0.7

This category includes services related to responding to questions from various creditors about the cases.

i) Court Hearings (833)

Fees: \$50,815.00 Hours: 42.9

This category includes services relating to preparing for, and attending, court hearings on behalf of the Committee.

j) Sale of Property (838)

Fees: \$3,959.00 Hours: 2.9

This category includes services relating to reviewing the notice of a proposed de minimis asset sale, communications with Province regarding the resolution with the Bank of Rantoul and updating the de minimis asset sale tracking sheet.

**SUMMARY OF EXPENSES**

15. During the Application Period, Greenberg Traurig incurred or disbursed actual and necessary costs and expenses related to these cases in the aggregate amount of \$15,621.67. Greenberg Traurig seeks reimbursement of actual expenses in the amount of \$15,621.67. The expenses incurred include, among other things, business meals, court fees, filing fees, imaging, information and research, local travel, messenger/courier services, off-site printing and copying charges, professional and legal services, subpoena charges, travel and lodging and UPS charges. A detailed description of the necessary costs and expenses incurred by Greenberg Traurig is attached as exhibits to the Tenth, Eleventh and Twelfth Monthly Fee Applications [Docket Nos. 1331-1, 1357-1 and 1540-1, respectively].

16. Pursuant to Local Rule 2016-2, Greenberg Traurig represents as follows with regard to its charges for actual and necessary costs and expenses incurred during the Application

Period, if any:

- a. Copy Charges by Greenberg Traurig were \$0.10 per page, which charge is reasonable and customary in the legal industry and represents the costs of copy material, acquisition, maintenance, storage, and operation of copy machines, together with a margin for recovery of related expenditures. In addition, Greenberg Traurig often utilizes outside copier services for high volume projects, and this Application seeks the recovery of those costs, if applicable;
- b. Incoming facsimiles are not billed;
- c. Out-going facsimiles are billed at the rate of \$0.25 per page. The cost represents operator time, maintaining several dedicated facsimile telephone lines, supplies and equipment, and includes a margin for recovery of related expenditures;
- d. Toll telephone charges are not billed; and
- e. Computer assisted legal research charges are billed at actual costs.

### **VALUATION OF SERVICES**

Greenberg Traurig expended a total of 340.5 hours in connection with this matter during the Application Period. The nature of the work performed by the Professionals is detailed in the exhibits of the Tenth, Eleventh and Twelfth Monthly Fee Applications [Docket Nos. 1331-1, 1357-1 and 1540-1, respectively].

17. In accordance with the factors enumerated in Section 330 of the Bankruptcy Code, the amounts requested herein for compensation and expense reimbursement are fair and reasonable given (a) the complexity of these cases, (b) the time expended by the attorneys and paraprofessionals at Greenberg Traurig, (c) the nature and extent of the services rendered, (d) the value of such services, and (e) the costs of comparable services other than in a case under this title.

18. Greenberg Traurig hereby certifies that (i) it has reviewed the requirements of Local Rule 2016-2 and (ii) this Application complies with such rule.

19. Greenberg Traurig has provided a copy of this Application to the Notice Parties (as defined in the Interim Compensation Order).

### **CONCLUSION**

WHEREFORE, Greenberg Traurig respectfully requests that (a) it be allowed compensation in the amount of \$355,677.82 (reflecting a reduction of \$62,766.68 from \$418,444.50) for professional services rendered and reimbursement of expenses in the amount of \$15,621.67 for the Application Period; (b) the Court authorizes the Debtors to pay Greenberg any unpaid portion for the Application Period on an interim basis; and (c) the Court grant such other and further relief deemed appropriate under the circumstances.

*[Remainder of page intentionally left blank.]*

Dated: May 21, 2025  
Wilmington, Delaware

Respectfully submitted,

**GREENBERG TRAURIG, LLP**

/s/ Dennis A. Meloro

Dennis A. Meloro (DE Bar No. 4435)  
222 Delaware Avenue, Suite 1600  
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- and -

Nancy A. Peterman (admitted *pro hac vice*)  
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**COUNSEL FOR THE OFFICIAL  
COMMITTEE OF UNSECURED CREDITORS**

**EXHIBITS A–C**

PLEASE TAKE NOTICE that in compliance with the *U.S. Trustee Program’s Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330 for Attorneys in Larger Chapter 11 Cases* (the “**U.S. Trustee Guidelines**”), attached hereto as **Exhibit A** is a copy of the budget and staffing plan agreed to between the Committee and Greenberg Traurig, LLP (“**Greenberg Traurig**”) for the period of January 1, 2025 through and including March 31, 2025 (the “**Fourth Interim Period**”). A chart comparing the total hours spent and the hours budgeted for each task code for the First Interim Period is attached hereto as **Exhibit B**.

PLEASE TAKE FURTHER NOTICE that attached hereto as **Exhibit C** is Greenberg Traurig’s customary and comparable compensation disclosures.

Dated: May 21, 2025  
Wilmington, Delaware

Respectfully submitted,

**GREENBERG TRAURIG, LLP**

/s/ Dennis A. Meloro

Dennis A. Meloro (DE Bar No. 4435)  
222 Delaware Avenue, Suite 1600  
Wilmington, Delaware 19801  
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- and –

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

**Exhibit A****Budget and Staffing Report (Estimated)****Greenberg Traurig, LLP****January 1, 2025 – March 31, 2025****(Fourth Interim Period)**

<b>Task Code</b>	<b>Project Category</b>	<b>Estimated Hours</b>	<b>Estimated Fees</b>
803	Business Operations	10	\$10,000
804	Case Administration	25	\$20,000
805	Claims Administration & Objections	25	\$25,000
807	Stay Relief	25	\$20,000
810	Litigation Matters	300	\$350,000
812	Plan and Disclosure Statement	50	\$75,000
813	Fee/Employment Applications	50	\$40,000
831	Creditors' Committee – General	25	\$30,000
832	Creditor Inquiries	10	\$7,500
833	Court Hearings	75	\$100,000
838	Sale of Property	50	\$60,000
		<b>645</b>	<b>\$737,500.00\$737,500.00\$737,500.00</b>

<b>Category of Timekeeper</b>	<b>Number of Timekeepers Expected to Work on Matter During the Budget Period</b>	<b>Average Hourly Rate</b>
Shareholders	5	\$1,275.00
Of Counsel	2	\$1,250.00
Associates	5	\$950.00
Paralegals	2	\$475.00

**Exhibit B**  
**Comparison of Fees and Hours Budgeted (Estimated) to Fees and Hours Billed**  
**During the Fourth Interim Period for Greenberg Traurig, LLP**

<b>Task Code</b>	<b>Project Category</b>	<b>Estimated Hours</b>	<b>Actual Hours Billed</b>	<b>Estimated Fees</b>	<b>Actual Fees</b>
803	Business Operations	10	0	\$10,000	\$0
804	Case Administration	25	15.3	\$20,000	\$22,814.50
805	Claims Administration & Objections	25	3.9	\$25,000	\$6,954.00
807	Stay Relief	25	2.3	\$20,000	\$3,478.50
810	Litigation Matters	300	194	\$350,000	\$228,185.50
812	Plan and Disclosure Statement	50	23.5	\$75,000	\$36,149.00
813	Fee/Employment Applications	50	37.6	\$40,000	\$34,851.00
831	Creditors' Committee – General	25	17.5	\$30,000	\$29,915.00
832	Creditor Inquiries	10	0.7	\$7,500	\$1,323.00
833	Court Hearings	75	42.9	\$100,000	\$50,815.00
838	Sale of Property	50	2.9	\$60,000	\$3,959.00
<b>TOTAL</b>		<b>645</b>	<b>340.5</b>	<b>\$737,500.00</b>	<b>\$418,444.50</b>

<b>Category of Timekeeper</b>	<b>Number of Timekeepers Expected to Work on Matter During the Interim Period</b>	<b>Actual Number of Timekeepers During the Interim Period</b>	<b>Estimated Average Hourly Rate</b>	<b>Actual Blended Hourly Rate</b>
Shareholders	5	7	\$1,275.00	\$1,298.27 (before discount) \$1,103.53 (after discount)
Of Counsel	2	0	\$1,000.00	\$0
Associates	5	3	\$950.00	\$944.41 (before discount) \$802.75 (after discount)
Paralegals	2	1	\$475.00	\$150 (before discount) \$127.50 (after discount)

**EXHIBIT C****CUSTOMARY AND COMPARABLE COMPENSATION  
DISCLOSURE WITH FEE APPLICATION****(FOURTH INTERIM PERIOD)**

<b>CATEGORY OF TIMEKEEPER</b>	<b>BILLED FIRM WIDE FOR PRECEDING YEAR (EXCLUDING BANKRUPTCY MATTERS)</b>	<b>BILLED IN THIS APPLICATION</b>
Shareholders	\$1,158.22	\$1,298.27 (before discount) \$1,103.53 (after discount)
Of Counsel	\$926.17	\$0
Associates	\$683.37	\$944.41 (before discount) \$802.75 (after discount)
Paralegals	\$400.43	\$150 (before discount) \$127.50 (after discount)

<b>Blended Hourly Rate Disclosures</b>		
<b>Category of Timekeeper</b>	<b>Billed by Timekeepers<sup>[1]</sup> in comparable practice areas for preceding calendar year (excluding bankruptcy matters)</b>	<b>Billed This Application</b>
Shareholders	\$1,198.33	\$1,298.27 (before discount) \$1,103.53 (after discount)
Of Counsel	\$1,066.07	\$0
Associates	\$735.16	\$944.41 (before discount) \$802.75 (after discount)
Paralegals	\$437.44	\$150 (before discount) \$127.50 (after discount)

<sup>[1]</sup> In accordance with the *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases*, effective November 1, 2013, preceding year is a rolling 12 months year ending March 31, 2024; blended rates reflect work performed in preceding year in each of the domestic offices in which timekeepers collectively billed at least 10% of the hours to the case during the Application Period, excluding all data from bankruptcy law matters. These rates reflect those of Greenberg Traurig's Chicago, Atlanta and Tampa offices, as the primary timekeepers in these cases are resident in such office, in the following practice areas: Corporate, Litigation, Intellectual Property, Real Estate, and Tax.

**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 REGARDING FOURTH  
INTERIM FEE APPLICATION OF GREENBERG TRAURIG, LLP**

I, Nancy A. Peterman, hereby declare, pursuant to 28 U.S.C. § 1746, under penalty of perjury as follows:

1. I am a Shareholder at Greenberg Traurig, LLP (“**Greenberg Traurig**”), which maintains offices for the practice of law at 360 North Green Street, Suite 1300, Chicago, IL 60607. I am an attorney-at-law, duly admitted and in good standing to practice in the States of Illinois and New York, and I am admitted *pro hac vice* in the United States Bankruptcy Court for the District of Delaware.

2. I make this certification regarding the *Fourth Interim Fee Application of Greenberg Traurig, LLP, Counsel to the Official Committee Of Unsecured Creditors of SC Healthcare Holding, LLC et al. for Allowance of Compensation for Services Rendered and Reimbursement of Expenses for the Period January 1, 2025 through March 31, 2025* (the “**Interim Fee Application**”) to certify to certain matters addressed in this court’s *Order Establishing Procedures*

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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).

*for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket No. 235] (the “**Interim Compensation Order**”).

3. Specifically, I have reviewed the Interim Fee Application, including each monthly fee application relating to the period from January 1, 2025 through March 31, 2025, and I hereby certify that such applications comply with the Interim Compensation Order and the applicable provisions of the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, and the Local Rules of Practice and Procedure of the United States Bankruptcy Court for the District of Delaware.

4. In addition, I hereby certify that, in accordance with the Interim Compensation Order, and in connection with preparing the Interim Fee Application, Greenberg Traurig has made a reasonable effort to comply with the *U.S. Trustee Program’s Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330 for Attorneys in Larger Chapter 11 Cases* (the “**U.S. Trustee Guidelines**”). To that end, Greenberg Traurig specifically responds to certain questions identified in the U.S. Trustee Guidelines as follows:

- **Question 1:** Did Greenberg Traurig agree to any variations from, or alternatives to, Greenberg Traurig’s standard or customary billing rates, fees or terms for services pertaining to this engagement that were provided during the application period? If so, please explain.
  - Answer: Yes. Greenberg Traurig agreed to a 15% reduction in fees except for time spent for non-working travel.
- **Question 2:** If the fees sought in the Interim Fee Application as compared to the fees budgeted for the time period covered by the Interim Fee Application are higher by 10% or more, did Greenberg Traurig discuss the reasons for the variation with the client?
  - Answer: No.
- **Question 3:** Have any of the professionals included in the Interim Fee Application varied their hourly rate based on geographic location of the bankruptcy case?

- Answer: No.
- **Question 4:** Does the Interim Fee Application include time for fees related to reviewing or revising time records or preparing, reviewing or revising invoices?
  - Answer: No.
- **Question 5:** Does the Interim Fee Application include time for fees for reviewing time records to redact any privileged or other confidential information? If so, please quantify hours and fees.
  - Answer: No.
- **Question 6:** Does the Interim Fee Application include any rate increases since retention in these cases?
  - Answer: No.

5. I declare under penalty of perjury that the foregoing is true and correct to the best of my information, knowledge, and belief.

Dated: May 21, 2025

Respectfully submitted,

**GREENBERG TRAURIG, LLP**

/s/ Nancy A. Peterman

Nancy A. Peterman (admitted *pro hac vice*)  
360 North Green Street, Suite 1300  
Chicago, IL 60607  
Telephone: (312) 456-8400  
Facsimile: (312) 456-8435  
Email: petermann@gtlaw.com

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

**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 OF  
GREENBERG TRAURIG, LLP, COUNSEL TO THE OFFICIAL  
COMMITTEE OF UNSECURED CREDITORS OF SC HEALTHCARE  
HOLDING, LLC ET AL. FOR ALLOWANCE OF COMPENSATION FOR  
SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES FOR  
THE PERIOD JANUARY 1, 2025 THROUGH MARCH 31, 2025**

Upon consideration of the fourth interim application of Greenberg Traurig, LLP (“**Greenberg Traurig**”), counsel 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 January 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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<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).

2. Greenberg Traurig's fees of \$355,677.82 and \$15,621.67 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 Greenberg Traurig any unpaid portion of such allowed fees and expenses.

4. Greenberg Traurig 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 11, 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 Greenberg Traurig, LLP (the “**Applicant**”), counsel to the Official Committee of Unsecured Creditors of SC Healthcare Holding, LLC *et al.* (the “**Committee**”), filed the *Fourth Interim Fee Application of Greenberg Traurig, LLP, Counsel to the Official Committee Of Unsecured Creditors of SC Healthcare Holding, LLC et al. for Allowance of Compensation for Services Rendered and Reimbursement of Expenses for the Period 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 \$355,677.84 and expenses in the amount of \$15,621.67 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 11, 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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<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).

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, 360 North Green Street, Suite 1300, Chicago, IL 60607, 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 21, 2025  
Wilmington, Delaware

Respectfully submitted,

**GREENBERG TRAURIG, LLP**

/s/ Dennis A. Meloro

Dennis A. Meloro (DE Bar No. 4435)  
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Wilmington, Delaware 19801  
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Email: melorod@gtlaw.com

- and -

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