

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)

**WITNESS AND EXHIBIT LIST OF WELLS FARGO BANK, N.A. RELATED TO  
MATTERS SCHEDULED FOR HEARING ON MAY 13, 2025 AT 10:00 A.M.**

Wells Fargo Bank, N.A. (“Wells Fargo”), by and through its undersigned counsel, hereby submits this Witness & Exhibit List for the hearing to be held on May 30, 2025 at 10:00 a.m. regarding the Debtors’ request for confirmation of its *Combined Disclosure Statement and Chapter 11 Plan of Liquidation* (D.I. 1410) and the *Objection of Wells Fargo Bank, N.A. to Debtors’ Combined Disclosure Statement and Chapter 11 Plan of Liquidation* (D.I. 1608).

**WITNESS LIST**

Wells Fargo reserves the right to call the following witnesses:

1. Gerald V. Rasmussen, Cushman & Wakefield (Real Property Valuation Expert)
2. David R. Campbell
3. Any witness called by another party-in-interest.

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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, for which the Debtors have requested joint administration, 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 will be made available on a website of the Debtors’ proposed claims and noticing agent at [www.kccllc.net/Petersen](http://www.kccllc.net/Petersen).



**EXHIBITS**

<b>Exhibit</b>	<b>Description</b>	<b>Docket No.</b>
1.	Final Order (I) Authorizing the Debtors to Obtain Postpetition Financing, (II) Granting Security Interests and Superpriority Administrative Expense Status, (III) Granting Adequate Protection to Certain Prepetition Secured Credit Parties, (IV) Modifying the Automatic Stay; (V) Authorizing the Debtors to Enter into Agreements with JMB Capital Partners Lending, LLC, (VI) Authorizing Use of Cash Collateral, and (VII) Granting Related Relief	313
2.	Proof of Claim of Wells Fargo Bank, N.A.	
2.A.	Mortgage dated January 16, 2001, regarding Prairie Rose Health Care Center	
2.B.	Mortgage Note dated January 16, 2001, secured by Mortgage on Prairie Rose Health Care Center	
2.C.	Security Agreement dated January 16, 2001, entered in connection with financing of Prairie Rose Health Care Center	
2.D.	Regulatory Agreement for Multifamily Housing Projects, dated January 16, 2001, regarding the Prairie Rose Health Care Center	
2.E.	Mortgage Record Change dated May 1, 2009	
2.F.	Fixture Filings regarding the Prairie Rose Health Care Center	
2.G.	Uniform Commercial Code Financing Statements (UCC-1s)	
3.	Appraisal of Real Property for Former Prairie Rose Health Care Center, 900 S. Chestnut St., Pana, Christian County, Illinois 62557 - prepared by Cushman & Wakefield	
4.	Order (I) Approving Asset Purchase Agreement, (II) Authorizing the Sale of All or Substantially All of the Debtors' Acquired Assets Free and Clear of All Liens, Claims, Interests, and Encumbrances Other than Assumed Liabilities and permitted Encumbrances, (III) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, and (IV) Granting Related Relief	653
5.	Order (I) Allocating Each Respective Purchase Price Among the Acquired Assets in Accordance with the Buyer Allocations, and (II) Granting Related Relief	1286
6.	Claims Register for SJL Health Systems, Inc., Case No. 24-10564	
7.	Amended Schedules of Assets and Liabilities of SJL Health Systems, Inc.	1484
8.	Order Approving Compromise and Agreement Between the Debtors, the Committee, and Column Financial, Inc.	1310
9.	Wells Fargo Bank, N.A.'s Motion for Allowance of Superpriority Administrative Expense Claim as Adequate Protection	1598
10.	Combined Disclosure Statement and Plan	1410
11.	Objection of Wells Fargo Bank, N.A. to Debtors' Combined Disclosure Statement and Chapter 11 Plan of Liquidation	1608

Wells Fargo also reserves the right to rely upon any other Exhibit(s) of another party-in-interest.

**RESERVATION OF RIGHTS**

Wells Fargo reserves the right to amend or supplement the foregoing lists at any time prior to or during the above-referenced hearing, or any continuation thereof. Wells Fargo further reserves the right to (i) cross-designate all witnesses and exhibits designated by any other party for the Hearing and seek to introduce any such exhibits into evidence, (ii) call any rebuttal and/or impeachment witnesses, as necessary, (iii) introduce any exhibits necessary to rebut or impeach a witness's testimony, (iv) examine or cross-examine any witness called by any other party at the hearing, (v) seek to introduce all or part of any exhibit on any other party's exhibit list, (vi) object to the introduction into evidence of any exhibit, in whole or in part, by any party, whether or not identified herein, (vii) object to and/or seek to exclude the testimony of any witness, in whole or in part, whether or not identified herein, and (viii) offer exhibits, as necessary, in response to evidence offered by any other party.

Dated: May 27, 2025

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 27th day of May 2025, a true and correct copy of the foregoing was served upon those parties registered to receive electronic notices via the Court's CM/ECF electronic noticing system and to the persons listed below as indicated:

**Via Electronic Mail**

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