

**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

**NOTICE OF AGENDA FOR HEARING OF MATTERS
SCHEDULED FOR JUNE 4, 2025 AT 10:00 A.M. (ET)**

PLEASE NOTE THAT THE HEARING WILL BE HELD IN COURTROOM NO. 7

This proceeding will be conducted in-person. All counsel and witnesses are expected to attend unless permitted to appear remotely via Zoom. Please refer to Judge Horan's Chambers Procedures and the Court's website (<https://www.deb.uscourts.gov/ecourt-appearances>) for information on who may participate remotely, the method of allowed participation (video or audio), Judge Horan's expectations of remote participants, and the advance registration requirements.

Registration is required by 4:00 p.m. (Eastern time) the business day before the hearing unless otherwise noticed using the eCourt Appearances tool available on the Court's website.

CONTESTED MATTERS GOING FORWARD

1. Mark B. Petersen's Motion for Allowance of Administrative Expense Claim
[\[D.I. 980, 11/6/24\]](#)

Objection Deadline: November 13, 2024 at 4:00 p.m. (ET)

Related Documents:

- A. Official Committee of Unsecured Creditors' Witness and Exhibit List
[\[D.I. 1015, 11/15/24\]](#)
- B. Mark B. Petersen's Omnibus Reply in Support of the Motion for Allowance of Administrative Expense Claim [\[D.I. 1016, 11/15/24\]](#)

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. Column Financial, Inc.'s Witness and Exhibit List [[D.I. 1019, 11/15/24](#)]
- D. Stipulation Regarding Mark B. Petersen's (I) Motion for Allowance of Administrative Expense Claim and (II) Motion for Relief from the Automatic Stay [[D.I. 1233, 2/3/25](#)]
- E. Column Financial, Inc.'s Witness and Exhibit List [[D.I. 1247, 2/10/25](#)]
- F. Mark B. Petersen's Witness and Exhibit List [[D.I. 1249, 2/10/25](#)]

Objections Filed:

- A. Debtors' Statement in Response to Mark B. Petersen's Motion for Allowance of Administrative Expense Claim [[D.I. 988, 11/12/24](#)]
- B. Limited Objection of Column Financial to Mark B. Petersen's Motion for Allowance of Administrative Expense Claim [[D.I. 991, 11/13/24](#)]
- C. [SEALED] Objection of the Official Committee of Unsecured Creditors of SC Healthcare Holdings, LLC, et al. to Mark B. Petersen's Motion for Allowance of Administrative Expense Claim [D.I. 996, 11/13/24]

Status: This matter has been partially resolved as reflected in the stipulation filed at D.I. 1233. Item (A) is resolved. Column Financial, Inc. has indicated that it will not prosecute Item (B). The parties are in ongoing negotiations to consensually resolve Item (C). Currently, this matter is going forward.

- 2. Mark B. Petersen's Motion for an Order Dismissing the Chapter 11 Cases of Debtors War Drive, LLC, and Knoxville & Pennsylvania, LLC, Under Sections 305(a) and 1112(b) of the Bankruptcy Code [[D.I. 989, 11/12/24](#)]

Objection Deadline: November 26, 2024 at 4:00 p.m. (ET), *extended for the Debtors to January 31, 2025 at 11:59 p.m. (ET)*

Related Documents:

- A. Notice of Withdrawal of Objection of JMB Capital Partners Lending LLC to Mark B. Petersen's Motion for an Order Dismissing the Chapter 11 Cases of Debtors War Drive, LLC, and Knoxville & Pennsylvania, LLC, Under Sections 305(a) and 1112(b) of the Bankruptcy Code [[D.I. 1066, 12/6/24](#)]
- B. Mark B. Petersen's Omnibus Reply in Support of the Motion for Allowance of Administrative Expense Claim [[D.I. 1016, 11/15/24](#)]
- C. Column Financial, Inc.'s Witness and Exhibit List [[D.I. 1247, 2/10/25](#)]
- D. Mark B. Petersen's Witness and Exhibit List [[D.I. 1249, 2/10/25](#)]

- E. Stipulation of Undisputed Facts Relating to Mark B. Petersen's Motion for an Order Dismissing the Chapter 11 Cases of Debtors War Drive, LLC, and Knoxville & Pennsylvania, LLC, Under Sections 305(a) and 1112(b) of the Bankruptcy Code [[D.I. 1296, 2/27/25](#)]
- F. Reply of Mark B. Petersen in Support of the Motion for an Order Dismissing the Chapter 11 Cases of Debtors War Drive, LLC, and Knoxville & Pennsylvania, LLC, Under Section 305(a) and 1112(b) of the Bankruptcy Code [[D.I. 1298, 2/27/25](#)]

Objections Filed:

- A. Objection of JMB Capital Partners Lending LLC to Mark B. Petersen's Motion for an Order Dismissing the Chapter 11 Cases of Debtors War Drive, LLC, and Knoxville & Pennsylvania, LLC, Under Sections 305(a) and 1112(b) of the Bankruptcy Code [[D.I. 1036, 11/26/24](#)]
- B. Objection of Column Financial, Inc. to Mark B. Petersen's Motion for an Order Dismissing the Chapter 11 Cases of Debtors War Drive, LLC, and Knoxville & Pennsylvania, LLC, Under Sections 305(a) and 1112(b) of the Bankruptcy Code [[D.I. 1037, 11/26/24](#)]
- C. Objection of the Official Committee of Unsecured Creditors to Mark B. Petersen's Motion for an Order, Dismissing the Chapter 11 Cases of Debtors War Drive, LLC and Knoxville & Pennsylvania, LLC Under Sections 305(a) and 1112(b) of the Bankruptcy Code [[D.I. 1065, 12/5/24](#)]

Status: Item (A) has been withdrawn. Column Financial, Inc. has indicated that it will not prosecute Item (B). The parties are in ongoing negotiations to consensually resolve Item (C). Currently, this matter is going forward.

- 3. Motion of Mark B. Petersen for Relief from the Automatic Stay Pursuant to Section 362(d) of the Bankruptcy Code [[D.I. 1210, 1/23/25](#)]

Objection Deadline: January 30, 2025 at 4:00 p.m. (ET), *extended for the Debtors to January 31, 2025 at 11:59 p.m. (ET)*

Related Documents:

- A. Stipulation Regarding Mark B. Petersen's (I) Motion for Allowance of Administrative Expense Claim and (II) Motion for Relief from the Automatic Stay [[D.I. 1233, 2/3/25](#)]
- B. Mark B. Petersen's Witness and Exhibit List [[D.I. 1249, 2/10/25](#)]

Objections Filed:

- A. Objection and Reservation of Rights of the Official Committee of Unsecured Creditors to Motion of Mark B. Petersen for Relief from the Automatic Stay

Pursuant to Section 362(d) of the Bankruptcy Code [[D.I. 1226, 1/30/25](#)]

Status: This matter has been partially resolved as reflected in the stipulation filed at D.I. 1233. The parties are in ongoing negotiations to consensually resolve this matter. Currently, this matter is going forward.

4. Confirmation of the Debtors' Combined Disclosure Statement and Chapter 11 Plan of Liquidation [[D.I. 1410, 4/21/25](#)]

Objection Deadline: May 23, 2025 at 4:00 p.m. (ET), *extended for Greg Wilson to May 27, 2025 at 12:00 p.m. (ET); extended for the Official Committee of Unsecured Creditors and Mark Petersen to May 28, 2025 at 10:00 a.m. (ET)*

Related Documents:

- A. Order (I) Approving the Combined Plan and Disclosure Statement on an Interim Basis for Solicitation Purposes Only; (II) Establishing the Deadline for Administrative Expenses Claims; (III) Establishing Solicitation and Voting Procedures; (IV) Approving the Form of Ballots and Solicitation Materials; (V) Establishing the Voting Record Date; (VI) Fixing the Date, Time, and Place for the Combined Hearing and the Deadlines for Filing Objections Thereto; and (VII) Granting Related Relief [[D.I. 1413, 4/21/25](#)]
- B. Notice of: (I) Approval of Combined Plan and Disclosure Statement on an Interim Basis for Solicitation Purposes Only; (II) Deadlines to File Administrative Expense Claims; and (III) the Hearing to Consider (A) Final Approval of the Combined Plan and Disclosure Statement as Containing Adequate Information and (B) Confirmation of the Combined Plan and Disclosure Statement [[D.I. 1414, 4/21/25](#)]
- C. Certificate of Publication of Publication Notice of (A) Combined Disclosure Statement and Chapter 11 Plan of Liquidation and (B) Deadline to File Administrative Expense Claims in the Chicago Tribune [[D.I. 1559, 5/7/25](#)]
- D. Notice of Filing of Plan Supplement for the Debtors' Combined Disclosure Statement and Chapter 11 Plan of Liquidation [[D.I. 1562, 5/9/25](#)]
- E. Witness and Exhibit List of Hartford Fire Insurance Company's Limited Objection to Debtors' Combined Plan and Disclosure Statement [[D.I. 1625, 5/27/25](#)]
- F. Debtors' Witness and Exhibit List [[D.I. 1626, 5/27/25](#)]
- G. Witness and Exhibit List of Wells Fargo Bank, N.A. [[D.I. 1627, 5/27/25](#)]

Objections Filed:

- A. Informal Responses:
 - i. Smartlinx Solutions
 - ii. Bank of Rantoul

- B. Missouri Department of Revenue's Objection to the Debtors' Chapter 11 Plan of Liquidation [[D.I. 1565, 5/14/25](#)]
- C. Hartford Fire Insurance Company's Limited Objection to the Debtors' Final Combined Disclosure Statement and Chapter 11 Plan of Liquidation [Docket No. 1355] as Modified [[D.I. 1603, 5/23/25](#)]
- D. Objection of Berkadia Commercial Mortgage LLC to Confirmation of the Debtors' Combined Disclosure Statement and Chapter 11 Plan of Liquidation [[D.I. 1607, 5/23/25](#)]
- E. Objection of Wells Fargo Bank, N.A. to Debtors' Combined Disclosure Statement and Chapter 11 Plan of Liquidation [[D.I. 1608, 5/23/25](#)]
- F. Objection of the United States Trustee to Confirmation of Debtors' Combined Disclosure Statement and Chapter 11 Plan of Liquidation [[D.I. 1609, 5/23/25](#)]
- G. Robert Gregory Wilson's Limited Objection to Confirmation of Debtors' Combined Disclosure Statement and Chapter 11 Plan of Liquidation [[D.I. 1612, 4/23/25](#)]
- H. Objection of the Official Committee of Unsecured Creditors to Debtors' Combined Disclosure Statement and Chapter 11 Plan of Liquidation [[D.I. 1635, 5/28/25](#)]
- I. Objection of Mark B. Petersen to Final Approval and Confirmation of the Debtors' Combined Disclosure Statement and Chapter 11 Plan of Liquidation [[D.I. 1636, 5/28/25](#)]

Status: Debtors' counsel will be prepared to provide a status update with respect to this matter at the hearing.

- 5. Debtors' Motion for Entry of an Order (I) Converting the Debtors' Chapter 11 Cases to Cases Under Chapter 7, (II) Establishing a Deadline for Filing Final Chapter 11 Fee Applications, and (III) Granting Related Relief [[D.I. 1629, 5/27/25](#)]

Objection Deadline: June 4, 2025 at 9:00 a.m. (ET)

Related Documents:

- A. Declaration of David R. Campbell in Support of Debtors' Motion for Entry of an Order (I) Converting the Debtors' Chapter 11 Cases to Cases Under Chapter 7, (II) Establishing a Deadline for Filing Final Chapter 11 Fee Applications, and (III) Granting Related Relief [[D.I. 1630, 5/27/25](#)]
- B. Order Shortening the Notice Period for the Debtors' Motion for Entry of an Order (I) Converting the Debtors' Chapter 11 Cases to Cases Under Chapter 7, (II) Establishing a Deadline for Filing Final Chapter 11 Fee Applications, and (III) Granting Related Relief [[D.I. 1646, 6/2/25](#)]

Objections Filed:

A. Informal Response from Bank of Rantoul

Status: This matter is going forward at the hearing.

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Dated: June 2, 2025
Wilmington, Delaware

Respectfully submitted,

**YOUNG CONAWAY STARGATT &
TAYLOR, LLP**

/s/ Shella Borovinskaya

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