

**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. Docket Nos. 1413, 1414, 1562**

**WITNESS AND EXHIBIT LIST**

The above-captioned debtors and debtors in possession (collectively, the “Debtors”), by and through their undersigned counsel, hereby submit their list of witnesses and exhibits (this “Witness and Exhibit List”) in connection with the hearing scheduled in these chapter 11 cases on June 10, 2025 (the “Hearing”) before the United States Bankruptcy Court for the District of Delaware (the “Court”).

**WITNESSES**

1. David R. Campbell, Debtors’ Chief Restructuring Officer.
2. Andres A. Estrada, Managing Director, Kurtzman Carson Consultants LLC dba Verita Global.
3. Any witness listed by any other party.
4. Any necessary rebuttal or impeachment witnesses.
5. The Debtors reserve the right to cross-examine any witness called by any other party.

<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, 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 [www.kccllc.net/Petersen](http://www.kccllc.net/Petersen).



241044325060600000000010

**EXHIBITS**

<b>EXHIBIT</b>	<b>DESCRIPTION OF EXHIBIT</b>	<b>OFFERED</b>	<b>OBJECTION</b>	<b>ADMITTED</b>
1.	<i>Declaration of Andres A. Estrada with Respect to Solicitation and the Tabulation of Votes on the Debtors' Combined Disclosure Statement and Chapter 11 Plan of Liquidation</i> [To be filed at or before deadline of June 6, 2025, at 11:59 p.m. ET]			
2.	<i>Declaration of David R. Campbell as Chief Restructuring Officer of the Debtors in Support of Confirmation of the Debtors' Combined Disclosure Statement and Chapter 11 Plan of Liquidation</i> [To be filed at or before deadline of June 6, 2025, at 11:59 p.m. ET]			
3.	<i>Robert Gregory Wilson's Limited Objection to Confirmation of Debtors' Combined Disclosure Statement and Chapter 11 Plan of Liquidation</i> [Docket No. 1612]			
4.	<i>Objection of the United States Trustee to Confirmation of Debtors' Combined Disclosure Statement and Chapter 11 Plan of Liquidation</i> [Docket No. 1609]			
5.	<i>Objection of Wells Fargo Bank, N.A. to Debtors' Combined Disclosure Statement and Chapter 11 Plan of Liquidation</i> [Docket No. 1608]			
6.	<i>Objection of Berkadia Commercial Mortgage LLC to Confirmation of the Debtors' Combined Disclosure Statement and Chapter 11 Plan of Liquidation</i> [Docket No. 1607]			
7.	<i>Supplemental Certificate of Service of Heather Fellows re: 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</i> [Docket No. 1606]			

8.	<i>Supplemental Certificate of Service of Travis R. Buckingham re: 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 [Docket No. 1605]</i>			
9.	<i>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 [Docket No. 1603]</i>			
10.	<i>Certificate of Service of Andres Estrada re: Solicitation Materials Served on or Before May 9, 2025 [Docket No. 1582]</i>			
11.	<i>Missouri Department of Revenue's Objection to the Debtors' Chapter 11 Plan of Liquidation [Docket No. 1565]</i>			
12.	<i>Notice of Filing of Plan Supplement for the Debtors' Combined Disclosure Statement and Chapter 11 Plan of Liquidation [Docket No. 1562]</i>			
13.	<i>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 [Docket No. 1559]</i>			
14.	<i>Certificate of Service of Hannah Bussey re: 1) Notice of Filing of Blackline of Debtors' Combined Disclosure Statement and Chapter 11 Plan of Liquidation and Liquidation Analysis; and 2) Notice of Twelfth Monthly Staffing Report for Compensation and Reimbursement of Expenses of Getzler Henrich &amp; Associates LLC for Providing Interim Management Services and Providing a Chief Restructuring Officer and Certain Additional Personnel to the Debtors, for</i>			

	<i>the Period from March 1, 2025 Through March 31, 2025 [Docket No. 1532]</i>			
15.	<i>Certificate of Service of Alejandro Guerra re: Documents Serviced on April 16, 2025 [Docket No. 1431]</i>			
16.	<i>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 [Docket No. 1413]</i>			
17.	<i>Notice of Filing of Blackline of Debtors' Combined Disclosure Statement and Chapter 11 Plan of Liquidation and Liquidation Analysis [Docket No. 1411]</i>			
18. 7	<i>Debtors' Combined Disclosure Statement and Chapter 11 Plan of Liquidation [Docket No. 1410]</i>			
19.	<i>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 &amp; Pennsylvania, LLC, Under Sections 305(a) and 1112(b) of the Bankruptcy Code [Docket No. 1298]</i>			
20.	<i>Motion of Mark B. Petersen for Relief from the Automatic Stay Pursuant to Section 362(d) of the Bankruptcy Code [Docket No. 1210]</i>			
21.	<i>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 &amp; Pennsylvania, LLC, Under Sections 305(a) and 1112(b) of the Bankruptcy Code [Docket No. 1065]</i>			

22.	<i>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 &amp; Pennsylvania, LLC, Under Sections 305(a) and 1112(b) of the Bankruptcy Code [Docket No. 1037]</i>			
23.	<i>Mark B. Petersen's Motion for an Order Dismissing the Chapter 11 Cases of Debtors War Drive, LLC, and Knoxville &amp; Pennsylvania, LLC, Under Sections 305(a) and 1112(b) of the Bankruptcy Code [Docket No. 989]</i>			
24.	<i>Mark B. Petersen's Motion for Allowance of Administrative Expense Claim [Docket No. 980]</i>			
25.	<i>Declaration of David R. Campbell in Support of Debtors' Motion for Entry of an Order (I) Approving Debtors' Key Employee Incentive Plan and (II) Approving Debtors' Key Employee Retention Plan [Docket No.782]</i>			
26.	<i>Debtors Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue to Use Their Bank Accounts, (B) Honor Prepetition Obligations Related Thereto, (C) Maintain the Refund Programs, (D) Perform Intercompany Transactions, (E) Maintain Existing Business Forms; and (II) Granting Related Relief [Docket No. 41]</i>			
27.	<i>Revised Proposed 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 [Docket No. 1413] [To be filed at or before deadline of June 6, 2025, at 11:59 p.m. ET]</i>			

28.	<i>Notice of Filing of Amended Plan Supplement for the Debtors' Combined Disclosure Statement and Chapter 11 Plan of Liquidation</i> [To be filed at or before deadline of June 6, 2025, at 11:59 p.m. ET]			
29.	Any document or pleading filed in the above-captioned case.			
30.	Any exhibit necessary for impeachment and/or rebuttal purposes.			
31.	Any exhibit identified or offered by any other party.			

The Debtors reserve the right to amend, withdraw, or supplement this Witness and Exhibit List in whole or in part at any time prior to the Hearing and/or in compliance with the Local Rules of the United States Bankruptcy Court for the District of Delaware and orders of the Court.

*[Remainder of page intentionally left blank]*

Dated: June 6, 2025  
Wilmington, Delaware

Respectfully submitted,

**YOUNG CONAWAY STARGATT &  
TAYLOR, LLP**

*/s/ Shella Borovinskaya*

---

Andrew L. Magaziner (No. 5426)  
Shella Borovinskaya (No. 6758)  
Carol E. Thompson (No. 6936)  
Rodney Square  
1000 North King Street  
Wilmington, Delaware 19801  
Telephone: (302) 571-6600  
Facsimile: (302) 571-1253  
Email: amagaziner@ycst.com  
sborovinskaya@ycst.com  
cthompson@ycst.com

and

**WINSTON & STRAWN LLP**

Daniel J. McGuire (admitted *pro hac vice*)  
Gregory M. Gartland (admitted *pro hac vice*)  
35 W. Wacker Drive  
Chicago, IL 60601  
Telephone: (312) 558-5600  
Facsimile: (312) 558-5700  
Email: dmcguire@winston.com  
ggartland@winston.com  
sahmad@winston.com

and

Carrie V. Hardman (admitted *pro hac vice*)  
200 Park Avenue  
New York, New York 10166  
Telephone: (212) 294-6700  
Facsimile: (212) 294-4700  
Email: chardman@winston.com

*Counsel for the Debtors and Debtors in  
Possession*