

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)

Ref. Docket No.: 1684

CERTIFICATE OF NO OBJECTION

The undersigned hereby certifies that, as of the date hereof, she has received no answer, objection, or other responsive pleading to the *Debtors' Fifth Motion for an Order, Pursuant to Bankruptcy Rules 9006 and 9027, Extending the Period Within Which the Debtors May Remove Actions Pursuant to 28 U.S.C. § 1452* [Docket No. 1684] (the "Motion"), filed with the United States Bankruptcy Court for the District of Delaware (the "Court") on June 11, 2025.

The undersigned further certifies that, as of the date hereof, she has reviewed the Court's docket in these cases and no answer, objection, or other responsive pleading to the Motion appears thereon. Objections to the Motion were to be filed and served by 4:00 p.m. (ET) on June 20, 2025.

As no responses to the Motion have been received, it is hereby respectfully requested that the proposed order attached to the Motion and attached hereto as **Exhibit A** be entered at the earliest convenience of the Court.

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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Dated: June 23, 2025
Wilmington, Delaware

Respectfully submitted,

**YOUNG CONAWAY STARGATT &
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*Counsel for the Debtors and Debtors in
Possession*

EXHIBIT A

Proposed Order

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

In re

SC HEALTHCARE HOLDING, LLC *et al.*

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Chapter 11

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**ORDER, PURSUANT TO BANKRUPTCY RULES 9006 AND 9027, FURTHER
EXTENDING THE PERIOD WITHIN WHICH THE DEBTORS MAY REMOVE
ACTIONS PURSUANT TO 28 U.S.C. § 1452**

Upon the motion (the “Motion”)² of the Debtors for the entry of an order (this “Order”), pursuant to Bankruptcy Rules 9006 and 9027, extending the period within which the Debtors may remove actions pursuant to 28 U.S.C. § 1452 through and including September 8, 2025; and this Court having reviewed the Motion; and upon the record of these Chapter 11 Cases; and due and proper notice of the Motion having been given; and it appearing that no other or further notice of the Motion is required; and it appearing that this Court has jurisdiction to consider the Motion in accordance with 28 U.S.C. §§ 157 and 1334 and the Amended Standing Order; and it appearing that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and it appearing that venue of this proceeding and the Motion is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having determined that it may enter a final order consistent with Article III of the United States Constitution; and this Court having reviewed the Motion and having heard the statements in

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² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

support of the relief requested in the Motion at a hearing before this Court, if any; and it appearing that the relief requested in the Motion and provided for herein is in the best interest of the Debtors, their estates, and their creditors; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.
2. The time period provided by Bankruptcy Rule 9027 within which the Debtors and their estates may file notices of removal of claims and causes of action is hereby enlarged and extended through and including September 8, 2025 (the “Removal Deadline”).
3. This Order shall be without prejudice to the rights of the Debtors and their estates to seek further extensions of the Removal Deadline.
4. This Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.