

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

In re:

SC HEALTHCARE HOLDING, LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 24-10443 (TMH)

(Jointly Administered)

Re. D.I. Nos. 1575 & 1576

**CERTIFICATION OF COUNSEL REGARDING OMNIBUS  
ORDER APPROVING FOURTH INTERIM FEE APPLICATIONS  
FOR PATIENT CARE OMBUDSMAN PROFESSIONALS**

1. I, Cheryl A. Santaniello, of Porzio, Bromberg & Newman, P.C. (“Porzio”), counsel to Suzanne Koenig, the patient care ombudsman (“Ombudsman”) appointed in the above-captioned bankruptcy cases (the “Chapter 11 Cases”), hereby certify as follows.

2. Porzio and SAK Management Services, LLC d/b/a SAK Healthcare (“SAK” and collectively with Porzio, the “Professionals”) retained by the Ombudsman filed the following interim fee applications (collectively, the “Interim Fee Applications”) on May 14, 2025:

- a. Fourth Interim Fee Application of Porzio, Bromberg & Newman, P.C., as Counsel to the Patient Care Ombudsman, for Allowance of Compensation and Reimbursement of Expenses for the Period of January 1, 2025 through March 31, 2025 [D.I. 1575]; and
- b. Fourth Interim Fee Application of SAK Management Services, LLC d/b/a SAK Healthcare, as Medical Operations Advisor to the Patient Care Ombudsman, for Allowance of Compensation and Reimbursement of Expenses for the Period of January 1, 2025 through March 31, 2025 [D.I. 1576].

3. On May 28, 2025, Wells Fargo Bank, N.A. (“Wells Fargo”) filed its *Omnibus Objection of Wells Fargo Bank, N.A. to Payment of Chapter 11 Professionals’ Administrative Claims* [D.I. 1639] (the “WF Objection”), objecting to multiple professionals’ monthly fee

<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).



statements, including the Application. On June 11, 2025, Wells Fargo withdrew the WF Objection [D.I. 1679].

4. The undersigned hereby certifies that, as of the date hereof, other than the WF Objection noted above, no answer, objection nor other responsive pleading has been received to the Interim Fee Applications.

5. The undersigned further certifies that after reviewing the Court's docket in this case, other than the WF Objection noted above, no formal answer, objection or other responsive pleading to the Interim Fee Applications appear thereon.

6. Responses or objections to the Interim Fee Applications were to be filed and served no later than June 4, 2025 at 4:00 p.m. (EST).

7. The Professionals seek approval of all fees and expenses sought by the Interim Fee Applications on an interim basis. Attached hereto as **Exhibit A** is a proposed form of omnibus order approving the Interim Fee Applications (the "Proposed Omnibus Fee Order").

8. Accordingly, the Professionals respectfully request that the Court enter the Proposed Omnibus Fee Order at its earliest convenience.

Date: June 23, 2025  
Wilmington, Delaware

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*Counsel for the Patient Care Ombudsman*

**EXHIBIT A**

**Proposed Order**

**IN THE UNITED STATES BANKRUPTCY COURT  
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In re:

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Debtors.

Chapter 11

Case No. 24-10443 (TMH)

(Jointly Administered)

**Re D.I. Nos. 1575 & 1576**

**OMNIBUS ORDER APPROVING FOURTH INTERIM FEE  
APPLICATIONS FOR PATIENT CARE OMBUDSMAN PROFESSIONALS**

Upon consideration of the interim fee applications of professionals (collectively, the “Professionals”) retained in the bankruptcy cases of the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”) for allowance of compensation and reimbursement of expenses for the period for the fourth interim fee period (collectively, the “Interim Fee Applications”); and it appearing to the Court that all of the requirements of sections 327, 328, 330, 331 and 503(b) of title 11 of the United States Code, as well as Rule 2016 of the Federal Rules of Bankruptcy Procedure and Rule 2016-2 of the Local Rules of Bankruptcy Practice and Procedure for the United States Bankruptcy Court for the District of Delaware, have been satisfied; and it further appearing that the expenses incurred were reasonable and necessary; and that notices of the Interim Fee Applications were appropriate; and after due deliberation and sufficient good cause appearing therefore;

**IT IS HEREBY ORDERED THAT:**

1. The Interim Fee Applications are APPROVED on an interim basis in the amount set forth on the attached **Exhibit A**.

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2. The Professionals are granted allowance of compensation on an interim basis in the amount set forth on **Exhibit A** attached hereto.

3. The Professionals are granted reimbursement of expenses on a final basis in the amount set forth on **Exhibit A** attached hereto.

4. The Debtors are authorized and directed, as provided herein, to remit, or caused to be remitted, payment in the amount set forth on **Exhibit A** attached hereto.

5. The Court shall retain jurisdiction with respect to all matters arising from or related to the implementation of this Order.

**EXHIBIT A**

**Interim Fee Application Chart**

Professional	Role	Retention Date	Compensation Period	Fees Requested	Expenses Requested	Total Fees & Expenses	Fees Paid to Date	Expenses Paid to Date	Net Total Payment Outstanding
Porzio, Bromberg & Newman, P.C.	Counsel to the Patient Care Ombudsman	May 24, 2024 <i>nunc pro tunc</i> April 18, 2024	January 1, 2025 through March 31, 2025	\$91,553.50	\$3,199.98	\$94,753.48	\$61,508.80	\$1,322.10	\$31,922.58
SAK Management Services, LLC d/b/a SAK Healthcare	Medical Operations Advisor to the Patient Care Ombudsman	May 24, 2024 <i>nunc pro tunc</i> April 16, 2024	January 1, 2025 through March 31, 2025	\$64,027.50	\$1,907.61	\$65,935.11	\$48,408.00	\$1,907.61	\$15,619.50