

**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)

Objection Deadline: July 14, 2025 at 4:00 p.m. (ET)
Hearing Date: Only if an objection is filed.

**SUMMARY OF FOURTEENTH MONTHLY APPLICATION OF GREENBERG
TRAURIG, LLP, COUNSEL TO THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS OF SC HEALTHCARE HOLDING, LLC *ET AL.*
FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED
AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM
MAY 1, 2025 THROUGH MAY 31, 2025**

Name of Applicant:	Greenberg Traurig, LLP (“ <u>Greenberg Traurig</u> ”)
Authorized to Provide Professional Services to:	The Official Committee of Unsecured Creditors
Date of Retention:	April 10, 2024
Period for Which Compensation and Reimbursement sought:	May 1, 2025 – May 31, 2025
Amount of Compensation Sought as Actual, Reasonable and Necessary:	\$152,764.50 (before discount) ² \$129,849.83 (after discount) Total Discount: \$22,914.67
Amount of Compensation for Which Payment is Sought Pursuant to this Application:	\$103,879.86 (80% of fees)
Amount of Expense Reimbursement Sought as Actual, Reasonable and Necessary:	\$4,970.27

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 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.

² As reflected in its retention application, Greenberg Traurig has agreed to give a 15% discount on its fees, except for non-working travel time.



This is a(n): X Monthly Interim Final Application

This Application does not include any hours incurred in connection with preparation of this Application.

SUMMARY OF PRIOR APPLICATIONS

Date Filed, Docket No.	Period Covered	Requested Fees	Requested Expenses	Approved Fees	Approved Expenses	Order Entered
June 15, 2024 [Docket No. 524]	Apr. 10, 2024 to Apr. 30, 2024	\$808,284.35	\$4,241.12	\$808,284.35	\$4,241.12	[Docket No. 873]
July 9, 2024 [Docket No. 632]	May 1, 2024 to May 31, 2024	\$660,842.35	\$27,713.13	\$660,842.35	\$27,713.13	[Docket No. 873]
July 23, 2024 [Docket No. 738]	June 1, 2024 to June 30, 2024	\$362,531.80	\$20,059.66	\$357,404.92 ³	\$20,059.66	[Docket No. 873]
August 27, 2024 [Docket No. 789]	July 1, 2024 to July 31, 2024	\$402,386.65	\$5,231.14	\$402,386.65	\$5,231.14	[Docket No. 1168]
September 30, 2024 [Docket No. 891]	Aug. 1, 2024 to Aug. 31, 2024	\$345,811.25	\$6,069.06	\$345,811.25	\$6,069.06	[Docket No. 1168]
October 23, 2024 [Docket No. 935]	Sept. 1, 2024 to Sept. 30, 2024	\$167,510.78	\$3,861.12	\$152,985.78 ⁴	\$3,861.12	[Docket No. 1168]
November 14, 2024 [Docket No. 1002]	Oct. 1, 2024 to Oct. 31, 2024	\$243,459.20	\$11,280.39	\$194,767.36	\$11,280.39	[Docket No. 1354]
December 27, 2024 [Docket No. 1127]	Nov. 1, 2024, to Nov. 30, 2024	\$291,172.60	\$10,796.27	\$232,938.08	\$10,796.27	[Docket No. 1354]
January 29, 2025 [Docket No. 1223]	Dec. 1, 2024 to Dec. 31, 2024	\$213,301.90	\$9,002.86	\$170,641.52	\$9,002.86 ⁵	[Docket No. 1354]

³ As reflected in Schedule 1 to the *Omnibus Order Approving First Interim Fee Applications of the Committee's Professionals* [Docket No. 873], Greenberg Traurig agreed to voluntarily reduce its requested fees by \$5,126.88. The line item for Greenberg Traurig's June monthly fee application reflects this reduction.

⁴ As reflected in Schedule 1 to the *Omnibus Order Approving Second Interim Fee Applications of the Committee's Professionals* [Docket No. 1168], Greenberg Traurig agreed to voluntarily reduce its requested fees by \$14,525.00.

⁵ As reflected in Schedule 1 to the *Omnibus Order Approving Third Interim Fee Applications of the Committee's Professionals* [Docket No. 1354], Greenberg Traurig agreed to voluntarily reduce its requested expenses by \$631.08.

Date Filed, Docket No.	Period Covered	Requested Fees	Requested Expenses	Approved Fees	Approved Expenses	Order Entered
March 14, 2025 [Docket No. 1331]	Jan. 1, 2025 to Jan. 31, 2025	\$148,840.53	\$7,515.72	\$119,072.42	\$7,515.72	N/A
March 21, 2025 [Docket No. 1357]	Feb. 1, 2025 to Feb. 28, 2025	\$115,922.14	\$4,491.18	\$92,737.12	\$4,491.18	N/A
May 1, 2025 [Docket No. 1540]	Mar. 1, 2025 to Mar. 31, 2025	\$90,915.15	\$3,614.77	\$72,732.12	\$3,614.77	N/A
May 28, 2025 [Docket No. 1641]	Apr. 1, 2025 to Apr. 30, 2025	\$122,098.20	\$3,649.71	\$97,678.56	\$3,649.71	N/A

COMPENSATION BY INDIVIDUAL

Name of Professional Person	Position of the Application; Date of Bar Admission; Area of Expertise	Hourly Billing Rate	Total Billed Hours	Total Compensation
Shareholders				
Danny Duerdoth	Shareholder; Member of Illinois Bar since 2016; Area of Expertise: Bankruptcy.	\$1,185	16.00	\$18,960.00
Shari L. Heyen	Shareholder; Member of the Texas Bar since 1990; Area of Expertise: Bankruptcy.	\$1,890	21.30	\$40,257.00
Nancy A. Peterman	Shareholder; Member of Illinois Bar since 1991; Member of the New York Bar since 2012. Area of Expertise: Bankruptcy.	\$1,835	23.60	\$43,306.00
Dennis A. Meloro	Shareholder; Member of Delaware Bar since 2003; Area of expertise: Bankruptcy.	\$1,625	11.80	\$19,175.00
David Eastlake	Shareholder; Member of the Texas Bar since 2007. Area of Expertise: Bankruptcy	\$1,440	5.90	\$8,496.00
Eric J. Howe	Shareholder; Member of the Minnesota Bar since 2005; Area of expertise: Bankruptcy.	\$1,345	5.90	\$7,935.50
Danielle S. Kemp	Shareholder; Member of the Florida Bar since 2000; Area of Expertise: Bankruptcy.	\$950	11.50	\$10,925.00
Associates				
Allison J. McGregor	Associate; Member of the Georgia Bar since 2021. Area of Expertise: Bankruptcy	\$700	5.30	\$3,710.00
Blended Rate for Shareholders:		\$1,626.18		
Blended Rate for Associates:		\$700		
			Total:	\$152,764.50
			Discount:	\$22,914.67
Grand Total (after discount):				\$129,849.83

COMPENSATION BY PROJECT CATEGORY

Task Code	Project Category	Total Hours	Total Fees
804	Case Administration	4.30	\$7,088.50
805	Claims Administration & Objections	1.40	\$2,513.50
807	Stay Relief	0.20	\$237.00
810	Litigation Matters	16.70	\$21,096.00
812	Plan and Disclosure Statement	55.00	\$84,766.00
813	Fee/Employment Applications	12.10	\$15,966.50
831	Creditors' Committee – General	11.00	\$19,989.50
832	Creditor Inquiries	0.50	\$945.00
833	Court Hearings	0.10	\$162.50
Totals		101.30	\$152,764.50

EXPENSE SUMMARY

Expense Category	Total Expenses
Business Meals	\$41.54
GT Imaging	\$3,049.91
Information and Research	\$60.80
Travel	\$1,818.02
Total Disbursements:	\$4,970.27

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(Jointly Administered)

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**FOURTEENTH MONTHLY APPLICATION OF GREENBERG TRAURIG, LLP,
COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS
OF SC HEALTHCARE, LLC, *ET AL.* FOR ALLOWANCE OF COMPENSATION
FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES FOR
THE PERIOD FROM MAY 1, 2025 THROUGH MAY 31, 2025**

Greenberg Traurig, LLP (“**Greenberg Traurig**”), counsel to the Official Committee of Unsecured Creditors (the “**Committee**”) in the above-captioned cases of the debtors and debtors in possession (the “**Debtors**”), hereby submits its fourteenth monthly application (the “**Application**”) for compensation and reimbursement of expenses for the period from May 1, 2025 through and including May 31, 2025 (the “**Application Period**”) pursuant to 11 U.S.C. §§ 330 and 331 (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of Bankruptcy Procedure, Rule 2016-2 of the Local Rules of Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “**Local Rules**”), and this Court’s *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket No. 235] (the “**Interim Compensation Order**”).

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 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.veritaglobal.net/Petersen.

By this Application, Greenberg Traurig seeks a monthly interim allowance of compensation in the amount of \$129,849.83 and actual expenses in the amount of \$4,970.27, for an aggregate total of \$134,820.10 in accordance with the Interim Compensation Order. Greenberg Traurig hereby seeks payment of \$103,879.86 (80% of the allowed fees) and reimbursement of expenses in the amount of \$4,970.27 (100% of allowed expenses), for an aggregate total payment of \$108,850.13 for the Application Period. As explained herein, the requested interim fee amount includes a discount of \$22,914.67 to reflect Greenberg Traurig's agreement of a 15% discount on all fees, except for non-working travel, which is already billed at a reduced rate of 50% pursuant to Local Rule 2016-2(d)(ix). In support of the Application, Greenberg Traurig respectfully represents as follows:

BACKGROUND

1. On March 20, 2024 (the "**Petition Date**"), each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. The Debtors continue in possession of their properties and management of their businesses as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee or examiner has been requested or appointed in these cases.

2. The Debtors' cases are being jointly administered for procedural purposes only, pursuant to an order the Court entered on March 22, 2024 [Docket No. 79].

3. On April 9, 2024, the United States Trustee for the District of Delaware appointed the Committee pursuant to section 1102(a)(1) of the Bankruptcy Code [Docket No. 131]. On April 10, 2024, the Committee met, organized and selected Greenberg Traurig as its proposed counsel.

4. On April 23, 2024, the Court entered the Interim Compensation Order.

5. On May 1, 2024, the Committee filed the *Application of the Official Committee of Unsecured Creditors of SC Healthcare Holding, LLC., et al. for Entry of an Order Authorizing the*

Employment and Retention of Greenberg Traurig, LLP as Counsel Nunc Pro Tunc to April 10, 2024 [Docket No. 263] (the “**GT Retention Application**”).

6. On May 21, 2024, the Court entered an order authorizing the employment and retention of Greenberg Traurig *nunc pro tunc* to April 10, 2024 [Docket No. 338].

COMPENSATION PAID AND ITS SOURCE

7. All services performed during the Application Period for which Greenberg Traurig is requesting compensation were performed for or on behalf of the Committee.

8. Other than as set forth in the GT Retention Application, there is no proposed arrangement to compensate Greenberg Traurig. Greenberg Traurig has not shared, nor agreed to share (a) any compensation it has received or may receive with any other party or person, other than with the shareholders, counsel and associates of Greenberg Traurig, or (b) any compensation another person or party has received or may receive.

SUMMARY OF SERVICES RENDERED

9. This Application is the fourteenth monthly fee application filed by Greenberg Traurig in these cases. In connection with the professional services described below, by this Application, Greenberg Traurig seeks compensation in the amount of \$129,849.83 for the Application Period, which includes a discount of 15% on all fees, except for non-working travel time (which is already discounted by 50%).

10. The services rendered during this Application Period by Greenberg Traurig professionals and paraprofessionals (the “**Professionals**”) are listed in the chart below.

11. The majority of services rendered by Greenberg Traurig during the Application Period as counsel to the Committee are summarized below. Each of the following is set forth in the invoice attached hereto as **Exhibit A**: (i) a description of the Professionals performing the

services; (ii) the date the services were performed; (iii) a detailed description of the nature of the services and the related time expended; and (iv) a summary of the fees and hours of each Professional listed by project category (which applicable categories are set forth below). Specifically, Greenberg Traurig rendered the following services during the Application Period as counsel to the Committee:

a) Case Administration (804)

Fees: \$7,088.50 Hours: 4.30

This category includes services related to the general administration of these cases, including without limitation, maintaining a case calendar, analyzing general case issues, including, without limitation, calls with the Debtors' professionals regarding general case matters. The services contained in this category are general case issues and general strategy issues that do not easily fit into a more specific category.

b) Claims Administration & Objections (805)

Fees: \$2,513.50 Hours: 1.40

This category includes services related to reviewing and analyzing administrative claims asserted against the Debtors, including those administrative claims relating to the motions filed by Hartford, Berkadia and Wells Fargo prior to the hearing to confirm the Debtors' combined disclosure statement and plan of liquidation (the "**Combined D/S and Plan**").

c) Stay Relief (807)

Fees: \$237.00 Hours: 0.20

This category includes services related to reviewing proposed orders granting certain personal injury claimants relief from the automatic stay.

d) Litigation Matters (810)

Fees: \$21,096.00

Hours: 16.70

This category includes services related to analyzing claims against Mark Petersen, possible settlement of those claims and various settlement options. In addition, the Committee was served with discovery requests by Mark Petersen relating to the Combined D/S and Plan and responded to those requests. Finally, this category includes services relating to preparing portions of a draft settlement offer to Mark Petersen and analysis of the Debtors' motion to convert their cases to chapter 7 cases.

e) Plan & Disclosure Statement (812)

Fees: \$84,766.00

Hours: 55.00

This category includes services related to reviewing, analyzing and negotiating numerous issues relating to the Combined D/S and Plan, including, without limitation, negotiating a possible settlement agreement with Mark Petersen and related parties and analyzing and addressing feasibility issues. The services also included drafting, revising and negotiating, the schedule of retained causes of action, the plan administrator agreement, and the litigation trust agreement. Finally, this category includes time reviewing and analyzing objections to the Combined D/S and Plan and drafting and revising the Committee's objection to the Combined D/S and Plan.

f) Fee/Employment Applications (813)

Fees: \$15,966.50

Hours: 12.10

This category includes services related to drafting Greenberg Traurig's and Province's fourth interim fee applications, thirteenth monthly fee applications and certificates of no objection relating to their twelfth monthly fee applications.

g) Creditors' Committee -- General (831)

Fees: \$19,989.50 Hours: 11.00

This category includes services related to meetings with the Committee regarding various case related matters, including the possible settlement with Mark Petersen.

h) Creditor Inquiries (832)

Fees: \$945.00 Hours: 0.50

This category includes services related to communication with various creditors who reached out with general case inquiries.

i) Court Hearings (833)

Fees: \$162.50 Hours: 0.10

This category includes services relating to reviewing the Debtors' witness and exhibit list for the confirmation hearing.

SUMMARY OF EXPENSES

12. During the Application Period, Greenberg Traurig incurred or disbursed actual and necessary costs and expenses related to these cases in the aggregate amount of \$4,970.27. The expenses incurred include, among other things, imaging services (for maintenance of discovery documents), business meals, travel and information and research. A detailed description of the necessary costs and expenses incurred by Greenberg Traurig is attached hereto as **Exhibit B**.

13. Pursuant to Local Rule 2016-2, Greenberg Traurig represents as follows regarding its charges for actual and necessary costs and expenses incurred during the Application Period:

- a. Copy Charges were \$.10 per page, which charge is reasonable and customary in the legal industry and represents the costs of copy material, acquisition, maintenance, storage and operation of copy machines, together

with a margin for recovery of related expenditures. In addition, Greenberg Traurig often utilizes outside copier services for high volume projects, and this Application seeks the recovery of those costs, if applicable;

- b. Incoming facsimiles are not billed;
- c. Out-going facsimiles are billed at the rate of \$0.25 per page. The cost represents operator time, maintaining several dedicated facsimile telephone lines, supplies and equipment, and includes a margin for recovery of related expenditures;
- d. Toll telephone charges are not billed; and
- e. Computer assisted legal research charges are billed at actual costs.

VALUATION OF SERVICES

14. Greenberg Traurig expended a total of 101.30 hours in connection with this matter during the Application Period. A list of the Professionals who billed time during the Application Period is set forth below. The nature of the work performed by the Professionals is detailed in **Exhibit A** of this Application.

15. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, the amounts requested herein for compensation and expense reimbursement are fair and reasonable given (a) the complexity of these cases, (b) the time expended by the attorneys and paraprofessionals at Greenberg Traurig, (c) the nature and extent of the services rendered, (d) the value of such services, and (e) the costs of comparable services other than in a case under this title.

16. Greenberg Traurig hereby certifies that (i) it has reviewed the requirements of Local Rule 2016-2 and (ii) this Application complies with such rule.

17. Greenberg Traurig has provided a copy of this Application to the Notice Parties (as defined in the Interim Compensation Order).

CONCLUSION

WHEREFORE, Greenberg Traurig respectfully requests that (a) it be allowed compensation in the amount of \$129,849.83, for professional services rendered (which includes a 15% discount, except for non-working travel time) and reimbursement of expenses in the amount of \$4,970.27 for the Application Period; (b) the Court authorize the Debtors to pay Greenberg Traurig the amount of \$108,850.13, representing 80% of fees and 100% of expenses upon the filing of a certificate of no objection for the Application Period on an interim basis; and (c) the Court grant such other and further relief deemed appropriate under the circumstances.

[Remainder of page intentionally left blank.]

Dated: June 30, 2025

GREENBERG TRAURIG, LLP

/s/ Dennis A. Meloro

Dennis A. Meloro (DE Bar No. 4435)
222 Delaware Avenue, Ste. 1600
Wilmington, DE 19801
Telephone: (302) 661-7000
Facsimile: (302) 661-7360
Email: Melorod@gtlaw.com

-and-

Nancy A. Peterman (admitted *pro hac vice*)
Danny Duerdoth (admitted *pro hac vice*)
Greenberg Traurig, LLP
360 North Green Street, Ste. 1300
Chicago, Illinois 60607
Telephone: (312) 456-8400
Facsimile: (312) 456-8435
Emails: PetermanN@gtlaw.com
DuerdothD@gtlaw.com

**COUNSEL FOR THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS**

CERTIFICATION OF COMPLIANCE WITH LOCAL RULE 2016-2

I, Nancy A. Peterman, declare, pursuant to 28 U.S.C. § 1746, under penalty of perjury:

1. I am a shareholder in the applicant firm, Greenberg Traurig, LLP, and have been admitted to the bar of the States of Illinois and New York.
2. I have personally performed some of the legal services rendered by Greenberg Traurig, LLP as counsel to the Committee and am generally familiar with all other work performed on behalf of the Committee by the lawyers and paraprofessionals in the firm.
3. The facts set forth in the foregoing Application are true and correct to the best of my knowledge, information and belief. Moreover, I have reviewed the requirements of Local Rule 2016-2 and submit that the Application complies with such requirements.

Dated: June 30, 2025

/s/ Nancy A. Peterman
Nancy A. Peterman
360 North Green Street, Ste. 1300
Chicago, IL 60607
Telephone: (312) 456-8410
Facsimile: (312) 456-8435
Email: petermann@gtlaw.com

Exhibit A

(Fees)

Invoice No.: 1001059888
File No. : 224973.010100
Bill Date : June 20, 2025

SC Healthcare Holding Creditors Committee

INVOICE

Re: SC Healthcare Holding, LLC, et al.

Legal Services through May 31, 2025:

	\$	152,764.50
Less 15% Courtesy Discount:	\$	(22,914.67)
Total Fees:	\$	129,849.83

Expenses:

Travel	1,818.02	
Business Meals	41.54	
GT Imaging	3,049.91	
Information and Research	60.80	
Total Expenses:	\$	<u>4,970.27</u>
Current Invoice:	\$	<u>134,820.10</u>

NAP:ML
Tax ID: 13-3613083

PLEASE NOTE OUR NEW ADDRESS

Invoice No.: 1001059888
 Matter No.: 224973.010100

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Description of Professional Services Rendered:

TASK CODE: 804 CASE ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/14/25	Shari L. Heyen	Review case status (.4); telephone conference with Debtors (.5).	0.90	1,701.00
05/14/25	Nancy A. Peterman	Participate in weekly call with Debtors re financial update and plan issues.	0.50	917.50
05/15/25	Shari L. Heyen	Review docket update.	0.30	567.00
05/20/25	Danny Duerdoth	Update case calendar.	0.20	237.00
05/21/25	Danny Duerdoth	Revise case calendar to account for new deadlines.	0.20	237.00
05/21/25	Shari L. Heyen	All-hands call with Debtors' team regarding status and update.	0.50	945.00
05/21/25	Danielle S. Kemp	Participate in conference call with Debtors and Committee counsel re case status	0.50	475.00
05/21/25	Nancy A. Peterman	Telephone conference with Debtors re plan, financials and related issues.	0.50	917.50
05/27/25	Dennis A. Meloro	Review debtors' conversion motion and supporting declaration (.2); email with N. Peterman (.1).	0.30	487.50
05/28/25	Danny Duerdoth	Update case calendar.	0.20	237.00
05/28/25	Nancy A. Peterman	Participate in weekly call with Debtors re case issues generally.	0.20	367.00
Total Hours:			4.30	7,088.50

TIMEKEEPER SUMMARY FOR TASK CODE 804.

CASE ADMINISTRATION

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Standard Rate</u>	<u>Standard Amount</u>
Danny Duerdoth	0.60	1,185.00	711.00
Shari L. Heyen	1.70	1,890.00	3,213.00
Danielle S. Kemp	0.50	950.00	475.00
Dennis A. Meloro	0.30	1,625.00	487.50
Nancy A. Peterman	1.20	1,835.00	2,202.00
Total:	4.30	1,648.49	\$ 7,088.50

Invoice No.: 1001059888
 Matter No.: 224973.010100

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TASK CODE: 805 CLAIMS ADMINISTRATION & OBJECTIONS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/09/25	Shari L. Heyen	Review administrative claims (.3); emails from Province regarding same (.2).	0.50	945.00
05/16/25	Shari L. Heyen	High-level analysis of administrative claims.	0.40	756.00
05/21/25	Dennis A. Meloro	Review Hartford admin claim motion.	0.10	162.50
05/21/25	Dennis A. Meloro	Review Berkadia admin claim motion.	0.20	325.00
05/21/25	Dennis A. Meloro	Review Wells Fargo admin claim motion.	0.20	325.00
Total Hours:			1.40	2,513.50

TIMEKEEPER SUMMARY FOR TASK CODE 805.

CLAIMS ADMINISTRATION & OBJECTIONS

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Standard Rate</u>	<u>Standard Amount</u>
Shari L. Heyen	0.90	1,890.00	1,701.00
Dennis A. Meloro	0.50	1,625.00	812.50
Total:	1.40	1,795.36	\$ 2,513.50

Invoice No.: 1001059888
 Matter No.: 224973.010100

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TASK CODE: 807 STAY RELIEF

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/06/25	Danny Duerdoth	Review proposed orders for stay relief motions filed on May 5.	0.20	237.00
			Total Hours:	0.20 237.00

TIMEKEEPER SUMMARY FOR TASK CODE 807.

STAY RELIEF

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Standard Rate</u>	<u>Standard Amount</u>
Danny Duerdoth	0.20	1,185.00	237.00
Total:	0.20	1,185.00	\$ 237.00

Invoice No.: 1001059888
 Matter No.: 224973.010100

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TASK CODE: 810 LITIGATION MATTERS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/07/25	Nancy A. Peterman	Analyze Mark Petersen settlement options/structure.	0.70	1,284.50
05/09/25	Shari L. Heyen	Negotiations regarding possible case settlement (.9); multiple emails regarding same (.5).	1.40	2,646.00
05/09/25	Danielle S. Kemp	Review K. Stanger emails re Petersen settlement (.3); Exchange emails with N. Peterman re Schedule of Retained Actions (.2)	0.50	475.00
05/13/25	Danielle S. Kemp	Confer with N. Peterman re Petersen settlement	0.40	380.00
05/15/25	Danielle S. Kemp	Exchange emails with J. Elrod re claims against M. Petersen	0.30	285.00
05/16/25	Allison J. McGregor	Begin to research effect of subordination of loan agreement on rights under assigned guarantee agreements	0.70	490.00
05/18/25	Allison J. McGregor	Research effect of subordination of loan agreement (3.0) on rights under assigned guarantee agreement and draft summary of findings (1.6).	4.60	3,220.00
05/19/25	Danielle S. Kemp	Exchange emails with N. Peterman and D. Meloro re Petersen discovery requests and case status	0.40	380.00
05/20/25	Danielle S. Kemp	Email Debtors re Petersen discovery requests (.1); Review Petersen Discovery Requests (.3); Exchange emails with N. Peterman and D. Meloro re Petersen discovery requests (.2)	0.60	570.00
05/20/25	Dennis A. Meloro	Review Petersen's discovery requests (.1); emails with N. Peterman and D. Kemp re: same (.1).	0.20	325.00
05/22/25	Danielle S. Kemp	Telephone call with N. Peterman re Petersen discovery (.3); Exchange emails with P. Topper re Petersen discovery (.2)	0.50	475.00
05/23/25	Shari L. Heyen	Review information received for possible settlement with M. Petersen.	0.30	567.00
05/23/25	Danielle S. Kemp	Prepare for call with P. Topper re Petersen discovery (.2); Communicate with P. Topper re Petersen Discovery Requests and Deposition Notice (.3); Email D. Meloro and N. Peterman re Petersen discovery (.2)	0.70	665.00
05/27/25	Shari L. Heyen	Review, analysis and comment on settlement structure.	0.80	1,512.00
05/27/25	Danielle S. Kemp	Exchange emails with P. Topper re Petersen discovery (.1); Exchange emails with N. Peterman re M. Petersen settlement offer (.2)	0.30	285.00
05/28/25	Shari L. Heyen	Draft portion of settlement agreement with M. Petersen.	0.60	1,134.00

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05/28/25	Danielle S. Kemp	Review and address K. Stanger email re M. Petersen settlement offer	0.20	190.00
05/28/25	Danielle S. Kemp	Telephone call with S. Heyen, M. Kedziora and D. Eastlake re Petersen settlement	0.40	380.00
05/29/25	Shari L. Heyen	Emails with Committee members regarding global settlement (.7); review and analysis of settlement terms (.7).	1.40	2,646.00
05/30/25	Shari L. Heyen	Analysis of settlement terms, negotiations and questions from the Committee regarding same (.7); follow up regarding collection issues (.5).	1.20	2,268.00
05/30/25	Shari L. Heyen	Review Debtors' motion to convert (.2) and declaration in support thereof (.2).	0.40	756.00
05/30/25	Dennis A. Meloro	Review motion to shorten notice of debtors' conversion motion.	0.10	162.50
				<hr/>
Total Hours:			16.70	21,096.00

TIMEKEEPER SUMMARY FOR TASK CODE 810.

LITIGATION MATTERS

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Standard Rate</u>	<u>Standard Amount</u>
Shari L. Heyen	6.10	1,890.00	11,529.00
Danielle S. Kemp	4.30	950.00	4,085.00
Dennis A. Meloro	0.30	1,625.00	487.50
Nancy A. Peterman	0.70	1,835.00	1,284.50
Allison J. McGregor	5.30	700.00	3,710.00
Total:	16.70	1,263.23	\$ 21,096.00

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TASK CODE: 812 PLAN & DISCLOSURE STATEMENT

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/02/25	Nancy A. Peterman	Telephone conference with D. McGuire re plan related issues.	0.50	917.50
05/06/25	Danielle S. Kemp	Revise Schedule of Retained Causes of Action	1.30	1,235.00
05/07/25	Eric J. Howe	Revise plan administrator agreement	1.10	1,479.50
05/07/25	Danielle S. Kemp	Review and comment on Plan Administrator Agreement (.6); Review Province comments re Plan Administrator Agreement (.1)	0.70	665.00
05/07/25	Dennis A. Meloro	Review draft plan administrator agreement.	0.40	650.00
05/07/25	Dennis A. Meloro	Review plan reservation of causes of action and analysis of same (.6); emails with D. Kemp and N. Peterman re: same (.2).	0.80	1,300.00
05/07/25	Nancy A. Peterman	Revise litigation trust agreement.	0.60	1,101.00
05/07/25	Nancy A. Peterman	Revise retained actions listing.	0.40	734.00
05/08/25	Shari L. Heyen	Review plan supplement (.5); review retained causes of action (.3).	0.80	1,512.00
05/08/25	Eric J. Howe	Continued revision of plan administrator agreement	4.10	5,514.50
05/08/25	Danielle S. Kemp	Exchange emails with N. Peterman re Schedule of Retained Causes of Action (.2); Revise Schedule of Retained Causes of Action (1.0); Exchange emails with D. Meloro re Schedule of Retained Causes of Action (.2); Email with J. Elrod re Plan cause of action (.2); Telephone call with N. Peterman re Retained Actions and Petersen Settlement (.3)	1.90	1,805.00
05/08/25	Dennis A. Meloro	Research and analysis of issues relating to plan and open confirmation issues (1.0); emails with D. Kemp re same (.2).	1.20	1,950.00
05/08/25	Nancy A. Peterman	Finalize retained actions listing.	0.30	550.50
05/08/25	Nancy A. Peterman	Review and comment on draft plan administrator agreement.	1.60	2,936.00
05/08/25	Nancy A. Peterman	Finalize litigation trust agreement.	0.80	1,468.00
05/09/25	Shari L. Heyen	Review draft confirmation documents.	1.30	2,457.00
05/09/25	Dennis A. Meloro	Review plan supplement.	0.70	1,137.50
05/09/25	Dennis A. Meloro	Research and analysis of issues relating to causes of action and retention provisions in plan/plan supplement.	1.20	1,950.00
05/09/25	Nancy A. Peterman	Review additional revisions to liquidation trust agreement.	0.40	734.00
05/09/25	Nancy A. Peterman	Review additional revisions to retained causes of action.	0.30	550.50
05/09/25	Nancy A. Peterman	Further revision of plan administrator agreement.	0.90	1,651.50
05/09/25	Nancy A. Peterman	Continued settlement discussions with D. McGuire.	0.80	1,468.00
05/09/25	Nancy A. Peterman	Consider settlement options, structure and	1.60	2,936.00

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		ranges of recovery.		
05/12/25	Dennis A. Meloro	Further review of plan / causes of action retention (1.0); email with N. Peterman and D. Kemp re: same (.1).	1.10	1,787.50
05/12/25	Nancy A. Peterman	Continue to analyze settlement options.	0.50	917.50
05/13/25	Nancy A. Peterman	Continue settlement negotiations and structuring.	1.20	2,202.00
05/13/25	Nancy A. Peterman	Several telephone conferences and emails with Province re possible settlement.	0.40	734.00
05/14/25	Danny Duerdoth	Draft objection to plan.	3.30	3,910.50
05/14/25	Shari L. Heyen	Review status of exit after telephone conference with D. Campbell, et al.	0.40	756.00
05/14/25	Dennis A. Meloro	Review Missouri Department of Revenue plan confirmation objection.	0.10	162.50
05/15/25	Danny Duerdoth	Continue drafting objection to plan.	2.60	3,081.00
05/16/25	Shari L. Heyen	Analysis of exit/settlement options.	1.60	3,024.00
05/16/25	Danielle S. Kemp	Revise Liquidating Trust Agreement and Retained Actions Schedule (1.0); Email Winston re revisions to documents (.1); Telephone call with N. Peterman and S. Heyen re Petersen Settlement (.5)	1.60	1,520.00
05/16/25	Nancy A. Peterman	Strategy conference with S. Heyen and D. Kemp re settlement terms.	0.50	917.50
05/17/25	Danny Duerdoth	Finalize draft objection to plan.	0.70	829.50
05/19/25	Nancy A. Peterman	Telephone conference with D. McGuire re plan issues/settlement.	0.20	367.00
05/19/25	Nancy A. Peterman	Draft email to D. McGuire re settlement issues.	0.10	183.50
05/19/25	Nancy A. Peterman	Draft email to Province re settlement issues/information needs.	0.10	183.50
05/20/25	Shari L. Heyen	Review draft objection to the plan (.3); review update to Committee regarding same (.2).	0.50	945.00
05/20/25	Dennis A. Meloro	Review draft plan confirmation objection.	0.10	162.50
05/20/25	Nancy A. Peterman	Revise confirmation objection.	1.20	2,202.00
05/20/25	Nancy A. Peterman	Continue to negotiate possible settlement with Petersen.	0.60	1,101.00
05/21/25	Danielle S. Kemp	Review Committee Objection to Plan and Disclosure Statement (.3); Review K. Stanger email re Objection to Plan (.1)	0.40	380.00
05/22/25	Shari L. Heyen	Provide comments for objection to confirmation.	0.40	756.00
05/22/25	Eric J. Howe	Review and analyze banks' request for adequate protection claims (.4) and conference with N. Peterman regarding same (.3)	0.70	941.50
05/22/25	Dennis A. Meloro	Review revised confirmation objection.	0.10	162.50
05/22/25	Nancy A. Peterman	Revise confirmation objection.	0.70	1,284.50
05/22/25	Nancy A. Peterman	Telephone conference with UST re confirmation issues.	0.40	734.00
05/22/25	Nancy A. Peterman	Strategy conference with D. Kemp re plan supplement issues.	0.30	550.50
05/22/25	Nancy A. Peterman	Telephone conference with D. McGuire re possible settlement.	0.40	734.00
05/22/25	Nancy A. Peterman	Continue to consider settlement options for	0.70	1,284.50

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		consensual plan.		
05/23/25	Danny Duerdoth	Finalize for filing the committee's objection to the plan.	0.20	237.00
05/23/25	Shari L. Heyen	Review objections to the plan.	0.40	756.00
05/23/25	Dennis A. Meloro	Review Hartford confirmation objection.	0.10	162.50
05/23/25	Dennis A. Meloro	Review confirmation objection for filing.	0.20	325.00
05/23/25	Dennis A. Meloro	Review Wells Fargo confirmation objection.	0.10	162.50
05/23/25	Dennis A. Meloro	Review Berkadia confirmation objection.	0.10	162.50
05/23/25	Dennis A. Meloro	Review UST confirmation objection.	0.10	162.50
05/27/25	Dennis A. Meloro	Review confirmation objection for filing (.2); emails with N. Peterman (.1).	0.30	487.50
05/27/25	Nancy A. Peterman	Telephone conference with D. McGuire re settlement terms.	0.30	550.50
05/27/25	Nancy A. Peterman	Call with S. Heyen re settlement terms.	0.20	367.00
05/28/25	David Eastlake	Conferences and correspondence with S. Heyen regarding potential settlement and definitive documentation needed in connection therewith and related issues (.8); review and analyze background, pertinent filings in case and recent settlement communications among the parties (1.3); teleconference and correspondence with S. Heyen, M. Kedziora and D. Kemp regarding settlement structure and documentation issues and next steps (.9); teleconference with S. Heyen and N. Peterman regarding same and enforcement options and related issues, including plan confirmation issues and timing/enforcement of settlement by liquidating trustee (.4); review and analyze legal memorandum on enforcement of judgments in Illinois (.6); review and analyze real estate breakdown spreadsheet sent by D. Kemp to identify potential collateral to secure settlement (.2); review and analyze correspondence from K. Stanger regarding updated outline of settlement terms (.3); draft correspondence to committee regarding settlement enforcement options, updated settlement terms and conditions, and definitive documentation needed for various enforcement options (.6).	5.10	7,344.00
05/28/25	Shari L. Heyen	Review objections to confirmation.	0.60	1,134.00
05/28/25	Danielle S. Kemp	Telephone call with Debtors re status of Plan hearing	0.20	190.00
05/28/25	Dennis A. Meloro	Final review of confirmation objection for filing.	0.10	162.50
05/28/25	Dennis A. Meloro	Review Petersen confirmation objection.	0.10	162.50
05/28/25	Dennis A. Meloro	Email with N. Peterman re: confirmation hearing.	0.10	162.50
05/28/25	Nancy A. Peterman	Consider structuring issues for possible Petersen settlement.	0.50	917.50
05/28/25	Nancy A. Peterman	Exchange emails with D. McGuire re plan	0.20	367.00

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05/29/25	David Eastlake	issues. Review and analyze summary of settlement terms to be incorporated in confirmation order and other necessary ancillary documents to document settlement (.3); correspondence with N. Peterman, S. Heyen and B. Chatz regarding same and next steps (.3).	0.60	864.00
05/29/25	Nancy A. Peterman	Exchange emails with B. Chatz re settlement terms.	0.30	550.50
05/29/25	Nancy A. Peterman	Continue to work on Petersen deal terms, structure in the event of default.	0.40	734.00
05/30/25	David Eastlake	Teleconference with N. Peterman and S. Heyen regarding status of plan and settlement and expected conversion of cases to chapter 7.	0.20	288.00
				<hr/>
			Total Hours:	55.00 84,766.00

TIMEKEEPER SUMMARY FOR TASK CODE 812.

PLAN & DISCLOSURE STATEMENT

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Standard Rate</u>	<u>Standard Amount</u>
Danny Duerdoth	6.80	1,185.00	8,058.00
David Eastlake	5.90	1,440.00	8,496.00
Shari L. Heyen	6.00	1,890.00	11,340.00
Eric J. Howe	5.90	1,345.00	7,935.50
Danielle S. Kemp	6.10	950.00	5,795.00
Dennis A. Meloro	6.90	1,625.00	11,212.50
Nancy A. Peterman	17.40	1,835.00	31,929.00
	<hr/>	<hr/>	<hr/>
Total:	55.00	1,541.20	\$ 84,766.00

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TASK CODE: 813 FEE/EMPLOYMENT APPLICATIONS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/01/25	Danny Duerdoth	Confer with C. Kovich re: review of estate professional fees.	0.50	592.50
05/01/25	Dennis A. Meloro	Review, file Province March fee application.	0.30	487.50
05/01/25	Dennis A. Meloro	Review, revise, file GT March fee application.	0.60	975.00
05/06/25	Danny Duerdoth	Review and comment on C. Kovich's analysis of estate professional fees.	0.70	829.50
05/07/25	Danny Duerdoth	Continue reviewing and commenting on C. Kovich's analysis of estate professional fees.	2.10	2,488.50
05/13/25	Danny Duerdoth	Provide further comments to estate professional fee review prepared by C. Kovich.	0.90	1,066.50
05/17/25	Dennis A. Meloro	Review and comment on CNO for GT 12th monthly fee application.	0.10	162.50
05/17/25	Dennis A. Meloro	Review and comment on CNO for Province 12th monthly fee application.	0.10	162.50
05/19/25	Danny Duerdoth	Revise fourth interim fee app for GT (2.8) and Province (.4); revise April monthly fee app of GT (.5).	3.70	4,384.50
05/20/25	Danny Duerdoth	Revise April monthly fee app of Province.	0.30	355.50
05/20/25	Dennis A. Meloro	Review / revise Province 4th interim fee application for filing.	0.30	487.50
05/20/25	Dennis A. Meloro	Review/revise GT 4th interim fee application.	0.40	650.00
05/21/25	Dennis A. Meloro	Review/revise GT 4th interim fee application and exhibits for filing.	1.10	1,787.50
05/27/25	Danny Duerdoth	Finalize for filing GT April fee app.	0.10	118.50
05/27/25	Dennis A. Meloro	Review/revise GT April fee application.	0.40	650.00
05/28/25	Danny Duerdoth	Finalize for filing Province's April monthly fee app (.1).	0.10	118.50
05/28/25	Dennis A. Meloro	Review/revise GT April fee application for filing.	0.20	325.00
05/28/25	Dennis A. Meloro	Review Province April fee application for filing.	0.20	325.00
Total Hours:			12.10	15,966.50

TIMEKEEPER SUMMARY FOR TASK CODE 813.

FEE/EMPLOYMENT APPLICATIONS

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Standard Rate</u>	<u>Standard Amount</u>
Danny Duerdoth	8.40	1,185.00	9,954.00
Dennis A. Meloro	3.70	1,625.00	6,012.50
Total:	12.10	1,319.55	\$ 15,966.50

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TASK CODE: 831 CREDITORS' COMMITTEE - GENERAL

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/08/25	Shari L. Heyen	Review fee application issues (.3); emails to/from the Committee regarding same and fee discounts (.3).	0.60	1,134.00
05/08/25	Nancy A. Peterman	Draft email to Committee re possible settlement structure.	0.60	1,101.00
05/13/25	Shari L. Heyen	Emails to the Committee regarding plan confirmation.	0.30	567.00
05/19/25	Shari L. Heyen	Prepare for Committee meeting this week.	0.30	567.00
05/19/25	Nancy A. Peterman	Draft email update to Committee re plan issues.	0.30	550.50
05/21/25	Shari L. Heyen	Answer questions from Committee regarding post-confirmation issues.	0.60	1,134.00
05/21/25	Shari L. Heyen	Prepare for (.2) and attend (.6) Committee meeting.	0.80	1,512.00
05/21/25	Danielle S. Kemp	Participate in Creditors Committee Meeting	0.60	570.00
05/21/25	Nancy A. Peterman	Prepare for (.60) and participate in (.50) committee meeting re possible plan settlement.	1.10	2,018.50
05/22/25	Shari L. Heyen	Answer questions for Committee member regarding financial update provided by D. Campbell.	0.30	567.00
05/27/25	Shari L. Heyen	Prepare for Committee meeting.	0.50	945.00
05/27/25	Nancy A. Peterman	Draft email to UCC re upcoming meeting.	0.20	367.00
05/27/25	Nancy A. Peterman	Call with Province re settlement terms.	0.20	367.00
05/28/25	Shari L. Heyen	Review and analysis of settlement with M. Petersen and others (1.6); telephone conference with Committee regarding same (.6); emails to/from Committee regarding same (.5).	2.70	5,103.00
05/28/25	Nancy A. Peterman	Prepare for (.50) and participate in (.50) committee meeting re Mark Petersen settlement.	1.00	1,835.00
05/28/25	Nancy A. Peterman	Exchange emails with T. Marr re possible settlement.	0.20	367.00
05/28/25	Nancy A. Peterman	Telephone conference with G. Goodman re possible settlement.	0.20	367.00
05/28/25	Nancy A. Peterman	Draft email to Committee re voting on Mark Petersen settlement.	0.20	367.00
05/29/25	Nancy A. Peterman	Exchange emails with UCC re settlement, plan issues.	0.30	550.50
Total Hours:			11.00	19,989.50

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TIMEKEEPER SUMMARY FOR TASK CODE 831

CREDITORS' COMMITTEE - GENERAL

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Standard Rate</u>	<u>Standard Amount</u>
Shari L. Heyen	6.10	1,890.00	11,529.00
Danielle S. Kemp	0.60	950.00	570.00
Nancy A. Peterman	4.30	1,835.00	7,890.50
Total:	11.00	1,817.23	\$ 19,989.50

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TASK CODE: 832 CREDITOR INQUIRIES

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/29/25	Shari L. Heyen	Answer questions from creditor regarding case status and confirmation hearing.	0.50	945.00
			Total Hours:	0.50 945.00

TIMEKEEPER SUMMARY FOR TASK CODE 832,

CREDITOR INQUIRIES

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Standard Rate</u>	<u>Standard Amount</u>
Shari L. Heyen	0.50	1,890.00	945.00
Total:	0.50	1,890.00	\$ 945.00

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TASK CODE: 833 COURT HEARINGS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/27/25	Dennis A. Meloro	Review debtors' witness and exhibit list for confirmation hearing.	0.10	162.50
			Total Hours:	0.10 162.50

TIMEKEEPER SUMMARY FOR TASK CODE 833.

COURT HEARINGS

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Standard Rate</u>	<u>Standard Amount</u>
Dennis A. Meloro	0.10	1,625.00	162.50
Total:	0.10	1,625.00	\$ 162.50

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TASK ACTIVITY GRAND TOTAL SUMMARY

<u>Task Code</u>	<u>Task Description</u>	<u>Hours</u>	<u>Standard Amount</u>
804	CASE ADMINISTRATION	4.30	7,088.50
805	CLAIMS ADMINISTRATION & OBJECTIONS	1.40	2,513.50
807	STAY RELIEF	0.20	237.00
810	LITIGATION MATTERS	16.70	21,096.00
812	PLAN & DISCLOSURE STATEMENT	55.00	84,766.00
813	FEE/EMPLOYMENT APPLICATIONS	12.10	15,966.50
831	CREDITORS' COMMITTEE - GENERAL	11.00	19,989.50
832	CREDITOR INQUIRIES	0.50	945.00
833	COURT HEARINGS	0.10	162.50
Total:		101.30	\$ 152,764.50

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TIMEKEEPER ACTIVITY GRAND TOTAL SUMMARY

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Standard Rate</u>	<u>Standard Amount</u>
Danny Duerdoth	16.00	1,185.00	18,960.00
David Eastlake	5.90	1,440.00	8,496.00
Shari L. Heyen	21.30	1,890.00	40,257.00
Eric J. Howe	5.90	1,345.00	7,935.50
Danielle S. Kemp	11.50	950.00	10,925.00
Dennis A. Meloro	11.80	1,625.00	19,175.00
Nancy A. Peterman	23.60	1,835.00	43,306.00
Allison J. McGregor	5.30	700.00	3,710.00
Total:	101.30	1,508.04	\$ 152,764.50

Exhibit B

(Expenses)

Invoice No.: 1001059888
 Re: SC Healthcare Holding, LLC, et al.
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Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>		<u>AMOUNT</u>
04/15/25	ID# 0167283453399 Peterman/Nancy Air/Rail Travel Agency Fee to ORD/PHL/ORD Carrier- UNITED AIRLINES INC 4/16/25 to 4/17/25	\$	977.15
04/15/25	ID# 8900895495260 Peterman/Nancy Air/Rail Travel Agency Fee to Carrier- AIRLINES REPORTING CORPORATION.	\$	39.00
04/17/25	VENDOR: Peterman, Nancy A. INVOICE#: 104891 DATE: 5/21/2025 Hotel; 04/17/2025 Hotel stay for plan/ds hearing; Merchant: Hotel DuPont; Attendees: Nancy Peterman	\$	41.54
04/17/25	VENDOR: Peterman, Nancy A. INVOICE#: 104891 DATE: 5/21/2025 Hotel; 04/17/2025 Hotel stay for plan/ds hearing; Merchant: Hotel DuPont	\$	405.90
04/25/25	GT Imaging Invoice 20250425-2557-1 Dated 04/25/25 - Re: Sc Healthcare Holding Creditors Sc Healthcare H (Relativity Hosting)	\$	1,099.91
04/25/25	GT Imaging Invoice 20250425-2557-1 Dated 04/25/25 - Re: Sc Healthcare Holding Creditors Sc Healthcare H (Relativity User Fees)	\$	1,950.00
04/30/25	ID# 0167283453429 Peterman/Nancy Air/Rail Travel Agency Fee to ORD/PHL/ORD Carrier- UNITED AIRLINES INC 6/3/25 to 6/4/25	\$	356.97
04/30/25	ID# 8900895576470 Peterman/Nancy Air/Rail Travel Agency Fee to Carrier- AIRLINES REPORTING CORPORATION.	\$	39.00
05/08/25	WestlawNext Research by Dennis Meloro on 5/8/25 - Re: 224973.010100	\$	60.80
	Total Expenses:	\$	4,970.27

**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)

Objection Deadline: July 14, 2025 at 4:00 p.m. (ET)
Hearing Date: Only if an objection is filed.

NOTICE OF APPLICATION

PLEASE TAKE NOTICE that Greenberg Traurig, LLP, counsel to the Official Committee of Unsecured Creditors in the above-captioned cases, filed the *Fourteenth Monthly Fee Application of Greenberg Traurig, LLP, Counsel to the Official Committee of Unsecured Creditors of SC Healthcare Holdings, LLC, et al., for Allowance of Compensation and Reimbursement of Expenses for the Period from May 1, 2025 through May 31, 2025* (the “**Application**”) with the United States Bankruptcy Court for the District of Delaware (the “**Court**”).

PLEASE TAKE FURTHER NOTICE THAT any response or objection to the Application must be filed with the Court on, or prior to, **July 14, 2025 at 4:00 p.m. (Prevailing Eastern Time)** and served upon: (a) the Debtors, 830 W. Trailcreek Drive, Peoria, IL 61614, Attn: David R. Campbell (dcampbell@getzlerhenrich.com); (b) co-counsel to the Debtors, Winston & Strawn LLP, 35 West Wacker Drive, Chicago, IL 60601, Attn.: Gregory M. Gartland (ggartland@winston.com), Daniel J. McGuire (dmcguire@winston.com), and Joel McKnight Mudd (jmudd@winston.com) and 200 Park Avenue, New York, NY 10166, Attn.: Carrie V. Hardman (chardman@winston.com) and Young Conaway Stargatt & Taylor, LLP, Rodney Square, 1000 North King Street, Wilmington, DE 19801, Attn.: Andrew L. Magaziner (amagaziner@ycst.com), Shella Borovinskaya (sborovinskaya@ycst.com), and Carol E. Cox (ccox@ycst.com); (c) the Office of the United States Trustee, 844 King Street, Suite 2207, Lockbox 35, Wilmington, DE 19801, Attn: Linda Richenderfer (Linda.Richenderfer@usdoj.gov) and Jon Lipshie (Jon.Lipshie@usdoj.gov); (d) counsel to the Official Committee of Unsecured Creditors, Greenberg Traurig, LLP, 360 North Green Street, Ste. 1300, Chicago, IL 60607, Attn: Nancy A. Peterman (peterman@gtlaw.com) and Danny Duerdoth (duerdothd@gtlaw.com), and 1000 Louisiana Street, Suite 6700, Houston, TX 77002, Attn: Shari L. Heyen (shari.heyen@gtlaw.com), and 222 Delaware Avenue, Suite 1600, Wilmington, DE 19801, Attn: Anthony W. Clark (anthony.clark@gtlaw.com) and Dennis A. Meloro

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 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.veritaglobal.net/Petersen.

(dennis.meloro@gtlaw.com); (e) counsel to the DIP Lender, Norton Rose Fulbright US LLP, 1301 Avenue of the Americas, New York, NY 10019, Attn: Robert M. Hirsh (robert.hirsh@nortonrosefulbright.com) and Emily Hong (emily.hong@nortonrosefulbright.com) and Morris James LLP, 500 Delaware Avenue, Suite 1500, Wilmington, DE 19801, Attn: Eric J. Monzo (emonzo@morrisjames.com); and (f) counsel to Column Financial, Inc., Holland & Knight, LLP, 511 Union Street, Ste. 2700, Nashville, Tennessee 37219, Attn: Tyler Lane (tyler.layne@hkclaw.com) and Landis Rath & Cobb LLP, 919 Market Street, Suite 1800, P.O. Box 2087, Wilmington, Delaware 19899, Attn: Adam Landis (landis@lrclaw.com) and Rick Cobb (cobb@lrclaw.com).

PLEASE TAKE FURTHER NOTICE THAT PURSUANT TO THE ORDER ESTABLISHING PROCEDURES FOR INTERIM COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR RETAINED PROFESSIONALS [DOCKET NO. 235], IF NO OBJECTIONS ARE FILED AND SERVED IN ACCORDANCE WITH THE ABOVE PROCEDURES, THEN THE DEBTORS WILL BE AUTHORIZED TO PAY 80% OF REQUESTED MONTHLY FEES AND 100% OF REQUESTED EXPENSES WITHOUT FURTHER ORDER OF THE COURT. ONLY IF AN OBJECTION IS PROPERLY AND TIMELY FILED IN ACCORDANCE WITH THE ABOVE PROCEDURES WILL A HEARING BE HELD ON THE APPLICATION. ONLY THOSE PARTIES TIMELY FILING AND SERVING OBJECTIONS WILL RECEIVE NOTICE AND BE HEARD AT SUCH HEARING.

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Dated: June 30, 2025

GREENBERG TRAURIG, LLP

/s/ Dennis A. Meloro

Dennis A. Meloro (DE Bar No. 4435)
222 Delaware Avenue, Ste. 1600
Wilmington, DE 19801
Telephone: (302) 661-7000
Facsimile: (302) 661-7360
Email: Melorod@gtlaw.com

-and-

Nancy A. Peterman (admitted *pro hac vice*)
Danny Duerdoth (admitted *pro hac vice*)
Greenberg Traurig, LLP
360 North Green Street, Ste. 1300
Chicago, Illinois 60607
Telephone: (312) 456-8400
Facsimile: (312) 456-8435
Emails: PetermanN@gtlaw.com
DuerdothD@gtlaw.com

**COUNSEL FOR THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS**