

**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: Aug. 11, 2025 at 4:00 p.m. (ET)
Hearing Date: Only if an objection is filed.

**SUMMARY OF FIFTEENTH 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
JUNE 1, 2025 THROUGH JUNE 30, 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:	June 1, 2025 – June 30, 2025
Amount of Compensation Sought as Actual, Reasonable and Necessary:	\$168,065.75 (before discount) ² \$145,209.29 (after discount) Total Discount: \$22,856.46
Amount of Compensation for Which Payment is Sought Pursuant to this Application:	\$116,167.43 (80% of fees)
Amount of Expense Reimbursement Sought as Actual, Reasonable and Necessary:	\$6,026.80

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
June 30, 2025 [Docket No. 1720]	May 1, 2025 to May 31, 2025	\$129,849.83	\$4,970.27	\$103,879.86	\$4,970.27	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				
Shari L. Heyen	Shareholder; Member of the Texas Bar since 1990; Area of Expertise: Bankruptcy.	\$1,890	8.80	\$16,632.00
Nancy A. Peterman	Shareholder; Member of Illinois Bar since 1991; Member of the New York Bar since 2012. Area of Expertise: Bankruptcy.	\$1,835	24.60	\$45,141.00
		\$917.50 (50% travel time)	17.10	\$15,689.25
Dennis A. Meloro	Shareholder; Member of Delaware Bar since 2003; Area of expertise: Bankruptcy.	\$1,625	10.40	\$16,900.00
David Eastlake	Shareholder; Member of the Texas Bar since 2007. Area of Expertise: Bankruptcy	\$1,440	19.40	\$27,936.00
Martin J. Lee	Shareholder; Member of the Illinois bar since 2005; Area of Expertise: Real Estate	\$1,075	8.50	\$9,137.50
Martin Kedziora	Shareholder; Member of the Illinois Bar since 2009; Area of Expertise: Litigation	\$1,050	11.00	\$11,550.00
Associates				
Kristen Jacobsen	Associate; Member of the Texas Bar since 2017. Area of Expertise: Bankruptcy	\$1,000	24.30	\$24,300.00
Paralegals				
Carla Greenberg	Paralegal; joined the firm in 2001	\$150	5.20	\$780.00
Blended Rate for Shareholders:		\$1,432.72		
Blended Rate for Associates:		\$1,000		
Blended Rate for Paralegals:		\$150		
			Total:	\$168,065.75
			Discount:	\$22,856.46
			Grand Total (after discount):	\$145,209.29

COMPENSATION BY PROJECT CATEGORY

Task Code	Project Category	Total Hours	Total Fees
804	Case Administration	0.40	\$713.00
805	Claims Administration & Objections	0.40	\$650.00
809	Financing Matters & Cash Collateral	0.10	\$107.50
810	Litigation Matters	80.30	\$104,340.50
812	Plan and Disclosure Statement	15.60	\$28,152.00
813	Fee/Employment Applications	5.80	\$1,755.00
831	Creditors' Committee – General	0.50	\$945.00
832	Creditor Inquiries	0.60	\$1,134.00
833	Court Hearings	8.30	\$14,201.50
838	Sale of Property	0.20	\$378.00
922	Non-Working Travel (billed at 50%)	17.10	\$15,689.25
Totals		129.30	\$168,065.75

EXPENSE SUMMARY

Expense Category	Total Expenses
Business Meals	\$17.10
GT Imaging	\$3,049.91
Local Travel	\$263.55
Messenger/Courier Service	\$60.00
Professional & Legal	\$30.00
Travel and Lodging Out of Town	\$721.71
Travel	\$1,884.53
Total Disbursements:	\$6,026.80

**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: Aug. 11, 2025 at 4:00 p.m. (ET)
Hearing Date: Only if an objection is filed.

**FIFTEENTH MONTHLY APPLICATION OF GREENBERG TRAUIG, 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 JUNE 1, 2025 THROUGH JUNE 30, 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 fifteenth monthly application (the “**Application**”) for compensation and reimbursement of expenses for the period from June 1, 2025 through and including June 30, 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 \$145,209.29 and actual expenses in the amount of \$6,026.80, for an aggregate total of \$151,236.09 in accordance with the Interim Compensation Order. Greenberg Traurig hereby seeks payment of \$116,167.43 (80% of the allowed fees) and reimbursement of expenses in the amount of \$6,026.80 (100% of allowed expenses), for an aggregate total payment of \$122,194.23 for the Application Period. As explained herein, the requested interim fee amount includes a discount of \$22,856.46 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 fifteenth 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 \$145,209.29 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: \$713.00 Hours: 0.40

This category includes services related to the general administration of these cases, including without limitation, reviewing an order shortening not on the Debtors' conversion motion and conferring with counsel for the Debtors regarding a settlement.

b) Claims Administration & Objections (805)

Fees: \$650.00 Hours: 0.40

This category includes services related to reviewing the proposed order regarding Mark Petersen's administrative claim.

c) Financing Matters & Cash Collateral (809)

Fees: \$107.50 Hours: 0.10

This category includes services related to drafting forms of the promissory notes and mortgages.

d) Litigation Matters (810)

Fees: \$104,340.50 Hours: 80.30

This category includes services related to drafting, reviewing and revising the settlement agreement and release with Mark Petersen and the related term sheet, corresponding numerous times with Mark Petersen's counsel regarding information needed to prepare the mortgages relating to the settlement, drafting and revising the form of mortgage and the form promissory note, drafting and revising the consent judgment relating to the settlement with Mark Petersen.

e) Plan & Disclosure Statement (812)

Fees: \$28,152.00 Hours: 15.60

This category includes services related to reviewing, analyzing and negotiating numerous issues relating to the *Debtors' Combined Disclosure Statement and Chapter 11 Plan of Liquidation* [Docket No. 1410] (the "Combined D/S and Plan"), including, without limitation, negotiating a possible global settlement agreement with Mark Petersen and analyzing 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.

f) Fee/Employment Applications (813)

Fees: \$1,755.00 Hours: 5.80

This category includes services related to drafting Greenberg Traurig's fourteenth monthly fee application and certificates of no objection for Greenberg Traurig and Province relating to their thirteenth monthly fee applications.

g) Creditors' Committee -- General (831)

Fees: \$945.00

Hours: 0.50

This category includes services related to Committee questions regarding the liquidating trust.

h) Creditor Inquiries (832)

Fees: \$1,134.00

Hours: 0.60

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

i) Court Hearings (833)

Fees: \$14,201.50

Hours: 8.30

This category includes services relating to preparing for and attending the confirmation hearing.

j) Sale of Property (838)

Fees: \$378.00

Hours: 0.20

This category includes services related to reviewing the update from Province regarding the properties to be sold.

k) Non-Working Travel (922)

Fees: \$15,689.25

Hours: 17.10

This category includes travel time to and from hearings in Delaware.

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 \$6,026.80. The expenses incurred include, among other things, business meals, imaging services (for maintenance

of discovery documents), local travel, messenger services, professional and legal services, out of town lodging and travel. 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 129.30 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 \$145,209.29, for professional services rendered (which includes a 15% discount, except for non-working travel time) and reimbursement of expenses in the amount of \$6,026.80 for the Application Period; (b) the Court authorize the Debtors to pay Greenberg Traurig the amount of \$122,194.23, 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.

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Dated: July 28, 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:

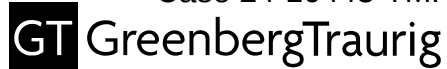
1. I am a shareholder in the applicant firm, Greenberg Traurig, LLP, and have been admitted to the bar of the States of Illinois and New York.
2. I have personally performed some of the legal services rendered by Greenberg Traurig, LLP as counsel to the Committee and am generally familiar with all other 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: July 28, 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.: 1001084028
 File No. : 224973.010100
 Bill Date : July 21, 2025

SC Healthcare Holding Creditors Committee

INVOICE

Re: SC Healthcare Holding, LLC, et al.

Legal Services through June 30, 2025:

	\$	152,376.50
Less Courtesy Discount:	\$	(22,856.46)
Non-Working Travel (922)	\$	15,689.25(Billed at 50%)
Total Fees:	\$	145,209.29

Expenses:

AP Travel - Suspense	1,884.53	
Business Meals	17.10	
GT Imaging	3,049.91	
Local Travel	263.55	
Messenger/Courier Services	60.00	
Professional & Legal	30.00	
Travel and Lodging Out of Town	721.71	
Total Expenses:	\$	6,026.80

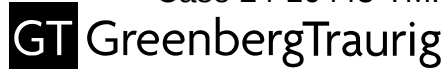
Current Invoice:	\$	151,236.09
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Previous Balance (see attached statement):	\$	331,703.58
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Total Amount Due:	\$	482,939.67
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NAP:EDL
 Tax ID: 13-3613083

PLEASE NOTE OUR NEW ADDRESS



Invoice No.: 1001084028
 File No. : 224973.010100

Account Statement

<u>Date</u>	<u>Invoice #</u>	<u>Fees Due</u>	<u>Expenses Due</u>	<u>Other Due</u>	<u>Total Due</u>
03/12/25	1000952487	29,768.11	0.00	0.00	29,768.11
03/13/25	1000955247	23,184.43	0.00	0.00	23,184.43
04/28/25	1000997930	18,183.03	0.00	0.00	18,183.03
05/15/25	1001025111	122,098.20	3,649.71	0.00	125,747.91
06/20/25	1001059888	129,849.83	4,970.27	0.00	134,820.10
Totals:		\$ 323,083.60	\$ 8,619.98	\$ 0.00	\$ 331,703.58

NAP:EDL

Tax ID: 13-3613083

PLEASE NOTE OUR NEW ADDRESS

Greenberg Traurig, LLP | Attorneys at Law | 360 N. Green Street | Suite 1300 | Chicago, Illinois 60607 | Tel 312.456.8400 | Fax 312.456.8435 | www.gtlaw.com

Invoice No.: 1001084028
 Matter No.: 224973.010100

Page 1

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>
06/02/25	Dennis A. Meloro	Review order shortening notice and notice of hearing on debtors' conversion motion.	0.10	162.50
06/03/25	Nancy A. Peterman	Telephone conference with D. McGuire re possible settlement.	0.30	550.50
Total Hours:			0.40	713.00

TIMEKEEPER SUMMARY FOR TASK CODE 804.

CASE ADMINISTRATION

<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
Nancy A. Peterman	0.30	1,835.00	550.50
Total:	0.40	1,782.50	\$ 713.00

Invoice No.: 1001084028
 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>
06/03/25	Dennis A. Meloro	Review revised proposed order on Petersen admin claim (.1); email with N. Peterman, D. Kemp (.1).	0.20	325.00
06/04/25	Dennis A. Meloro	Review draft Petersen admin claim order; email with N. Peterman, D. Kemp.	0.10	162.50
06/09/25	Dennis A. Meloro	Review revised proposed order on Petersen admin claim motion.	0.10	162.50
Total Hours:			0.40	650.00

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>
Dennis A. Meloro	0.40	1,625.00	650.00
Total:	0.40	1,625.00	\$ 650.00

Invoice No.: 1001084028
 Matter No.: 224973.010100

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TASK CODE: 809 FINANCING MATTERS & CASH COLL

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/11/25	Martin J. Lee	Drafted and circulated forms of the Promissory Notes and the Mortgages	0.10	107.50
			Total Hours:	0.10 107.50

TIMEKEEPER SUMMARY FOR TASK CODE 809

FINANCING MATTERS & CASH COLL

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Standard Rate</u>	<u>Standard Amount</u>
Martin J. Lee	0.10	1,075.00	107.50
Total:	0.10	1,075.00	\$ 107.50

Invoice No.: 1001084028
 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>
06/02/25	Shari L. Heyen	Review update from Province regarding M. Petersen assets.	0.30	567.00
06/03/25	Shari L. Heyen	Analyze settlement options with Mark Petersen.	0.90	1,701.00
06/04/25	David Eastlake	Review and analyze updated proposed settlement terms, including definitive documentation needed to memorialize and enforce the settlement (.6); correspondence with S. Heyen, N. Peterman and B. Chatz regarding call to discuss same and next steps leading up to confirmation hearing (.2); teleconference and correspondence with GT team regarding settlement and enforcement issues and definitive documentation needs to finalize deal (.7).	1.50	2,160.00
06/04/25	Kristen Jacobsen	Draft settlement agreement and release between Committee, Debtors, M. Petersen, and non-debtor affiliates.	7.70	7,700.00
06/04/25	Martin Kedziora	Analyze and discuss enforcement mechanisms related to settlement with M. Petersen.	1.30	1,365.00
06/04/25	Martin J. Lee	Correspondence with D. Eastlake re mortgage needed for settlement with Mark Petersen (.3); reviewed settlement documentation (.5).	0.80	860.00
06/04/25	Nancy A. Peterman	Outline settlement terms with M. Petersen to determine documentation for same.	0.30	550.50
06/05/25	David Eastlake	Review and comment on draft settlement agreement (.8); analyze settlement, collateral, priority and enforcement issues in connection with same (.4); review and comment on revised draft settlement agreement (.3); resolve open items/issues regarding same (.4); teleconference and correspondence with K. Jacobsen regarding security/collateral/enforcement issues and further revisions to settlement agreement (.4); teleconference with GT and Saul Ewing team regarding settlement terms/conditions, open items and next steps (.5); teleconference and correspondence with M. Lee regarding same and information requests for preparation of mortgages and related issues (.4); initial review of draft consent judgment (.2).	3.40	4,896.00
06/05/25	Shari L. Heyen	Telephone conference with counsel for M. Petersen regarding settlement terms (.5); review draft Plan Administrator Agreement	1.00	1,890.00

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		(.5).		
06/05/25	Kristen Jacobsen	Draft settlement agreement and release between Committee, Debtors, M. Petersen, and non-debtor affiliates (3.5); draft related consent judgment (1.0).	4.50	4,500.00
06/05/25	Martin J. Lee	Correspondence with D. Eastlake re mortgage issues.	0.20	215.00
06/05/25	Nancy A. Peterman	Determine documentation for Mark Petersen settlement.	0.50	917.50
06/06/25	David Eastlake	Teleconference and correspondence with S. Heyen regarding preparation of term sheet documenting Committee settlement and related issues and next steps (.4); discuss same with K. Jacobsen and open deal points (.3); review of and extensive revisions to draft settlement term sheet (1.3); review S. Heyen's comments to same (.3); further comment on revised settlement term sheet (.4); review latest draft of liquidation trust agreement and necessary changes thereto for updated settlement terms, including retained causes of action vesting in trust (.8); review correspondence between GT and Winston teams regarding same (.3); work to address open items in settlement agreement to finalize draft (.3); review revised Retained Causes of Action Schedules (.2).	4.30	6,192.00
06/06/25	Kristen Jacobsen	Draft settlement term sheet between Debtors, Committee, M. Petersen, and other Petersen entities for negotiation/plan confirmation purposes.	4.20	4,200.00
06/06/25	Martin J. Lee	Discussion with N. Peterman re settlement status.	0.20	215.00
06/06/25	Nancy A. Peterman	Review and comment on several versions of draft settlement term sheet with Mark Petersen.	1.20	2,202.00
06/07/25	David Eastlake	Correspondence with M. Lee regarding settlement term sheet and drafting of ancillary documents (.2); further comment on draft settlement term sheet (.2); correspondence with N. Peterman regarding same and related settlement/documentation issues (.3); review and comment on draft consent judgment (.5); correspondence with K. Jacobsen regarding same and related documentation issues (.2); correspondence with B. Chatz regarding requested property information for preparation of mortgages to secure promissory notes (.1); correspondence with M. Lee regarding same and timing of definitive documentation (.2); review correspondence from D. McGuire regarding note interest	2.20	3,168.00

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		issues (.1); review further revised settlement term sheet (.2); review revised settlement term sheet circulated by N. Peterman (.2).		
06/07/25	Kristen Jacobsen	Revise consent judgment as part of settlement with Petersen and his entities.	1.70	1,700.00
06/08/25	David Eastlake	Further review and revise settlement term sheet (.6); analyze protections and enforcement issues, including in an insolvency proceeding, in connection with same (.7); correspondence with N. Peterman regarding same and related issues (.4); correspondence with B. Chatz regarding property information needed for preparation of the mortgages (.2); review and respond to correspondence from D. Kemp and M. Lee regarding same and approach (.2); multiple correspondence with GT and Winston teams regarding settlement terms and related enforcement issues to address (.4); review revised schedule of retained causes of action in connection with revisions to the draft settlement agreement (.2).	2.70	3,888.00
06/08/25	Nancy A. Peterman	Continue to revise settlement term sheet with Mark Petersen.	0.30	550.50
06/09/25	David Eastlake	Correspondence with B. Chatz and A. Fayne regarding requested property information for preparation of mortgages (.2); review and comment on revised consent judgment (.2); review property and mortgage information received from D. Kemp (.3); review and analyze comments to settlement term sheet received from B. Chatz (.3); numerous correspondence with Winston, Saul Ewing and GT teams to finalize terms of settlement and resolve open issues (1.2); analyze claim and release issues in connection with same (.7); review and comment on revised settlement term sheet to circulate to parties (.3); review further comments to Schedule of Retained Causes of Action (.2); review and comment on further revised draft of settlement term sheet to be filed with court (.2).	3.60	5,184.00
06/09/25	Kristen Jacobsen	Further revision to consent judgment as part of settlement with Petersen and his entities.	0.50	500.00
06/09/25	Nancy A. Peterman	Review and comment on revised settlement term sheet with Mark Petersen and Debtors.	0.90	1,651.50
06/10/25	David Eastlake	Work to finalize consent judgment (.2); correspondence with M. Kedziora regarding same and timing (.2); correspondence with M. Lee regarding status of promissory notes and mortgages and other timing	1.00	1,440.00

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		considerations (.2); discuss revisions to term sheet to finalize with K. Jacobsen (.1); review and comment on revised draft binding settlement term sheet (.3).		
06/10/25	Martin Kedziora	Review draft of stipulated judgment in connection with settlement with M. Petersen.	0.30	315.00
06/11/25	Kristen Jacobsen	Revise consent judgment for settlement with Petersen and his entities.	1.90	1,900.00
06/11/25	Martin Kedziora	Revise and comment on draft consent judgment and enforcement of settlement with M. Petersen.	3.20	3,360.00
06/12/25	Martin Kedziora	Revise consent judgment and consult on enforcement of settlement.	1.20	1,260.00
06/12/25	Martin J. Lee	Correspondence with N. Peterman re note/mortgage (.1); revise forms of the Promissory Notes (.2) and the Mortgages (.3).	0.50	537.50
06/13/25	Shari L. Heyen	Review binding term sheet (.3) and telephone conference with D. Eastlake regarding same (.1).	0.40	756.00
06/13/25	Martin J. Lee	Correspondence with N. Peterman re settlement (.1); revise forms of the Promissory Notes (.7) and the Mortgages (.7).	1.50	1,612.50
06/13/25	Nancy A. Peterman	Draft email to Debtors' counsel and Mark Petersen's counsel re binding term sheet and stipulated judgment.	0.20	367.00
06/13/25	Nancy A. Peterman	Revise binding term sheet.	0.60	1,101.00
06/13/25	Nancy A. Peterman	Revise form of mortgage.	0.40	734.00
06/13/25	Nancy A. Peterman	Revise form of note.	0.40	734.00
06/13/25	Nancy A. Peterman	Telephone conference with Neeley's counsel re Mark Petersen settlement.	0.40	734.00
06/13/25	Nancy A. Peterman	Revise stipulated judgment.	0.60	1,101.00
06/15/25	Dennis A. Meloro	Review draft Petersen promissory note and mortgage.	0.40	650.00
06/15/25	Dennis A. Meloro	Review revised Petersen term sheet.	0.30	487.50
06/15/25	Dennis A. Meloro	Review draft Petersen consent judgment.	0.10	162.50
06/15/25	Nancy A. Peterman	Revise form of note.	0.70	1,284.50
06/15/25	Nancy A. Peterman	Revise form of mortgage.	0.80	1,468.00
06/15/25	Nancy A. Peterman	Draft email to Debtors' counsel and Mark Petersen's counsel re note and mortgage and next steps to finalize settlement.	0.20	367.00
06/17/25	Shari L. Heyen	Follow up regarding binding term sheet.	0.30	567.00
06/20/25	Shari L. Heyen	Review and comment on settlement documents.	0.50	945.00
06/21/25	Dennis A. Meloro	Review Petersen comments to settlement documents.	0.20	325.00
06/22/25	Nancy A. Peterman	Review comments from Mark Petersen's counsel to binding term sheet, form of mortgage, form of note and consent judgment.	0.40	734.00
06/23/25	David Eastlake	Review M. Peterson's comments to term sheet, notes and mortgages.	0.70	1,008.00
06/23/25	Kristen Jacobsen	Revise settlement documentation (1.3);	2.40	2,400.00

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		attend GT call reviewing comments from Debtors, Petersen, and Neeley (1.1).		
06/23/25	Martin Kedziora	Review and discuss proposed revisions to settlement documents with N. Peterman, M. Lee and K. Jacobsen (1.1); revise same (.9).	2.00	2,100.00
06/23/25	Martin J. Lee	Conference call with GT team re settlement documents (1.2); revise and circulate the draft Promissory Note (.5) and the draft form of Mortgage (.6).	2.30	2,472.50
06/23/25	Nancy A. Peterman	Call with GT team re revised Mark Petersen settlement documents.	1.20	2,202.00
06/23/25	Nancy A. Peterman	Review and comment on revised settlement agreement and consent judgment.	0.20	367.00
06/24/25	Martin Kedziora	Revise settlement documents with M. Petersen (1.2), discuss same with M. Lee (.3).	1.50	1,575.00
06/24/25	Martin J. Lee	Correspondence with M. Kedziora re jurisdiction and venue in the draft Promissory Note and the draft form of Mortgage; revised and circulated the draft Promissory Note and the draft form of Mortgage	0.50	537.50
06/24/25	Dennis A. Meloro	Review updated Petersen settlement term sheet and consent judgment.	0.20	325.00
06/25/25	Kristen Jacobsen	Create action item list of outstanding issues with definitive documentation for settlement with Petersen and his entities.	0.40	400.00
06/25/25	Martin Kedziora	Review/comment on settlement documents with M. Petersen.	0.20	210.00
06/25/25	Martin J. Lee	Correspondence with N. Peterman re how to handle plan administrator vs. liquidating trustee (.2); revised and circulated the draft Promissory Note (.3) and the draft form of Mortgage (.3).	0.80	860.00
06/26/25	Kristen Jacobsen	Attend call with Debtors and Petersen counsel regarding definitive documentation for settlement (0.3 hour); revise settlement term sheet (0.7 hour).	1.00	1,000.00
06/26/25	Martin Kedziora	Revise settlement documents relating to settlement with M. Petersen.	0.80	840.00
06/26/25	Martin J. Lee	Conference with GT team re settlement documents (.3); revised and circulated the draft Promissory Note (.5).	0.80	860.00
06/26/25	Nancy A. Peterman	Review revisions to settlement agreement (.20) and note (.20) relating to Mark Petersen settlement.	0.40	734.00
06/26/25	Nancy A. Peterman	Call with Saul Ewing and Winston teams re settlement documents and collateral.	0.50	917.50
06/27/25	Nancy A. Peterman	Review proposed collateral, including value and recorded debt.	0.40	734.00
06/27/25	Nancy A. Peterman	Revise settlement agreement (.40), note (.40) and stipulated judgment (.30) relating to Mark Petersen settlement.	1.10	2,018.50
06/29/25	Martin Kedziora	Review and comment on settlement documents with M. Petersen.	0.50	525.00

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06/29/25	Martin J. Lee	Reviewed comments to draft form of Mortgage (.3); revised and circulated draft form of Mortgage (.5).	0.80	860.00
06/30/25	Shari L. Heyen	Follow up regarding settlement terms and open items on the documents.	0.50	945.00
06/30/25	Nancy A. Peterman	Call with Saul Ewing team re settlement terms.	0.40	734.00
				<hr/>
Total Hours:			80.30	104,340.50

TIMEKEEPER SUMMARY FOR TASK CODE 810.

LITIGATION MATTERS

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Standard Rate</u>	<u>Standard Amount</u>
David Eastlake	19.40	1,440.00	27,936.00
Shari L. Heyen	3.90	1,890.00	7,371.00
Martin Kedziora	11.00	1,050.00	11,550.00
Martin J. Lee	8.40	1,075.00	9,030.00
Dennis A. Meloro	1.20	1,625.00	1,950.00
Nancy A. Peterman	12.10	1,835.00	22,203.50
Kristen Jacobsen	24.30	1,000.00	24,300.00
	<hr/>	<hr/>	<hr/>
Total:	80.30	1,299.38	\$ 104,340.50

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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>
06/02/25	Dennis A. Meloro	Call / email with Hartford counsel re: confirmation objection and declaration (.1); review declaration re: objection to admissibility (.1); email with N. Peterman re: same (.1).	0.30	487.50
06/04/25	Shari L. Heyen	Prepare for confirmation hearing today with N. Peterman and global settlement (1.2); analysis of settlement terms with M. Petersen (.6).	1.80	3,402.00
06/04/25	Nancy A. Peterman	Exchange emails with D. McGuire re new operator/Cascade issues.	0.20	367.00
06/04/25	Nancy A. Peterman	Telephone conference with D. Gordon re new operator issues.	0.20	367.00
06/05/25	Nancy A. Peterman	Call with D. Dooley and K. Stanger re liquidation trust.	0.30	550.50
06/06/25	Shari L. Heyen	Plan negotiations (1.0); discussions with Debtors' team and M. Petersen's team regarding confirmation and plan open items, including settlement (.8).	1.80	3,402.00
06/06/25	Nancy A. Peterman	Review and comment on plan administrator agreement.	0.90	1,651.50
06/06/25	Nancy A. Peterman	Revise retained causes of action schedule.	0.40	734.00
06/06/25	Nancy A. Peterman	Call with Debtors re sources/uses, plan issues.	0.30	550.50
06/06/25	Nancy A. Peterman	Review and comment on Berkadia stipulation.	0.20	367.00
06/06/25	Nancy A. Peterman	Review and comment on Wells Fargo stipulation.	0.20	367.00
06/06/25	Nancy A. Peterman	Revise liquidating trust agreement.	0.30	550.50
06/06/25	Nancy A. Peterman	Review and comment on Smartlink stipulation.	0.20	367.00
06/06/25	Nancy A. Peterman	Review and comment on voting declaration and related papers.	0.30	550.50
06/06/25	Nancy A. Peterman	Review and comment on draft confirmation brief.	0.80	1,468.00
06/06/25	Nancy A. Peterman	Review and comment on draft confirmation order.	0.80	1,468.00
06/07/25	Dennis A. Meloro	Review updated liquidation analysis.	0.20	325.00
06/07/25	Dennis A. Meloro	Review proposed plan confirmation order.	1.10	1,787.50
06/08/25	Dennis A. Meloro	Review amended plan supplement.	0.30	487.50
06/08/25	Dennis A. Meloro	Review Campbell confirmation declaration.	0.20	325.00
06/08/25	Dennis A. Meloro	Review debtors' brief in support of plan confirmation.	0.40	650.00
06/08/25	Dennis A. Meloro	Review plan voting declaration.	0.10	162.50
06/08/25	Nancy A. Peterman	Determine additional revisions to confirmation order.	0.30	550.50
06/08/25	Nancy A. Peterman	Revise retained action list.	0.30	550.50
06/08/25	Nancy A. Peterman	Review and respond to D. Dooley email re trust issues.	0.20	367.00

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06/09/25	Dennis A. Meloro	Review proposed revisions to confirmation order (.2); emails with N. Peterman re: same (.1).	0.30	487.50
06/09/25	Nancy A. Peterman	Review and comment on several versions of revised confirmation order.	1.20	2,202.00
06/09/25	Nancy A. Peterman	Review various objections to confirmation.	0.50	917.50
06/09/25	Nancy A. Peterman	Several emails with Martin Brothers counsel re confirmation order and X-Cal receivership issues.	0.80	1,468.00
06/10/25	Dennis A. Meloro	Review second amended plan supplement.	0.10	162.50
06/10/25	Dennis A. Meloro	Review updated draft of proposed confirmation order.	0.20	325.00
06/10/25	Nancy A. Peterman	Finalize confirmation order.	0.40	<u>734.00</u>
Total Hours:			15.60	28,152.00

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>
Shari L. Heyen	3.60	1,890.00	6,804.00
Dennis A. Meloro	3.20	1,625.00	5,200.00
Nancy A. Peterman	8.80	1,835.00	16,148.00
Total:	15.60	1,804.62	\$ 28,152.00

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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>
06/05/25	Carla Greenberg	Draft GT's fourteenth monthly fee application (May).	0.80	120.00
06/11/25	Carla Greenberg	Draft CNO's for GT (.2) and Province's (.2) thirteenth monthly fee applications; email drafts to GT team (.1).	0.50	75.00
06/12/25	Dennis A. Meloro	Review CNO for Province April fee application.	0.10	162.50
06/12/25	Dennis A. Meloro	Review and comment on CNO for GT April fee application.	0.10	162.50
06/23/25	Carla Greenberg	Draft GT's fourteenth monthly fee application.	2.00	300.00
06/24/25	Carla Greenberg	Draft GT's fourteenth monthly fee application (1.8); email draft to GT team (.1).	1.90	285.00
06/30/25	Dennis A. Meloro	Review Province May fee application for filing.	0.10	162.50
06/30/25	Dennis A. Meloro	Review/revise GT May fee application for filing.	0.30	487.50
Total Hours:			5.80	1,755.00

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>
Dennis A. Meloro	0.60	1,625.00	975.00
Carla Greenberg	5.20	150.00	780.00
Total:	5.80	302.59	\$ 1,755.00

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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>
06/04/25	Shari L. Heyen	Answer questions from Committee members regarding liquidating trust.	0.50	945.00
			Total Hours:	0.50 945.00

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	0.50	1,890.00	945.00
Total:	0.50	1,890.00	\$ 945.00

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TASK CODE: 832 CREDITOR INQUIRIES

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/09/25	Shari L. Heyen	Answer questions from creditor regarding plan confirmation status and hearing thereon.	0.40	756.00
06/10/25	Shari L. Heyen	Telephone conference with creditor regarding confirmed plan.	0.20	378.00
Total Hours:			0.60	1,134.00

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	0.60	1,890.00	1,134.00
Total:	0.60	1,890.00	\$ 1,134.00

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TASK CODE: 833 COURT HEARINGS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/03/25	Nancy A. Peterman	Prepare for 6/4 hearing.	0.50	917.50
06/04/25	Dennis A. Meloro	Prep for (1.5) and attend (.3) 6/4 hearing.	1.80	2,925.00
06/04/25	Nancy A. Peterman	Attend court hearing.	0.20	367.00
06/06/25	Dennis A. Meloro	Review 6/10 hearing agenda.	0.10	162.50
06/09/25	Dennis A. Meloro	Review amended 6/10 hearing agenda.	0.10	162.50
06/10/25	Dennis A. Meloro	Prep for (.12) and attend (1.5) 6/10 confirmation hearing.	2.70	4,387.50
06/10/25	Nancy A. Peterman	Prepare for (1.2) and participate in (1.5) confirmation hearing.	2.70	4,954.50
06/24/25	Dennis A. Meloro	Review 6/26 hearing agenda.	0.10	162.50
06/25/25	Dennis A. Meloro	Review amended 6/26 hearing agenda; email with N. Peterman.	0.10	162.50
Total Hours:			8.30	14,201.50

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	4.90	1,625.00	7,962.50
Nancy A. Peterman	3.40	1,835.00	6,239.00
Total:	8.30	1,711.02	\$ 14,201.50

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TASK CODE: 838 SALE OF PROPERTY

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/27/25	Shari L. Heyen	Update from Province regarding properties to sell.	0.20	378.00
			Total Hours:	0.20 378.00

TIMEKEEPER SUMMARY FOR TASK CODE 838.

SALE OF PROPERTY

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Standard Rate</u>	<u>Standard Amount</u>
Shari L. Heyen	0.20	1,890.00	378.00
Total:	0.20	1,890.00	\$ 378.00

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TASK CODE: 922 TRAVEL

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/03/25	Nancy A. Peterman	Travel to DE for hearing.	3.80	3,486.50
06/04/25	Nancy A. Peterman	Travel to Chicago after hearing.	4.50	4,128.75
06/09/25	Nancy A. Peterman	Travel to Delaware for confirmation hearing.	3.80	3,486.50
06/10/25	Nancy A. Peterman	Travel to Chicago after confirmation hearing.	5.00	4,587.50
			<hr/>	
			Total Hours:	17.10 15,689.25

TIMEKEEPER SUMMARY FOR TASK CODE 922

TRAVEL

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Standard Rate</u>	<u>Standard Amount</u>
Nancy A. Peterman	17.10	917.50	15,689.25
Total:	17.10	0.00	\$ 15,689.25

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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	0.40	713.00
805	CLAIMS ADMINISTRATION & OBJECTIONS	0.40	650.00
809	FINANCING MATTERS & CASH COLL	0.10	107.50
810	LITIGATION MATTERS	80.30	104,340.50
812	PLAN & DISCLOSURE STATEMENT	15.60	28,152.00
813	FEE/EMPLOYMENT APPLICATIONS	5.80	1,755.00
831	CREDITORS' COMMITTEE - GENERAL	0.50	945.00
832	CREDITOR INQUIRIES	0.60	1,134.00
833	COURT HEARINGS	8.30	14,201.50
838	SALE OF PROPERTY	0.20	378.00
922	TRAVEL	17.10	15,689.25
Total:		112.20	\$ 152,376.50

TASK ACTIVITY GRAND TOTAL SUMMARY

<u>Task Code</u>	<u>Task Description</u>	<u>Hours</u>	<u>Standard Amount</u>
922	TRAVEL	17.10	15,689.25
Total:		17.10	\$ 15,689.25

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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>
David Eastlake	19.40	1,440.00	27,936.00
Shari L. Heyen	8.80	1,890.00	16,632.00
Martin Kedziora	11.00	1,050.00	11,550.00
Martin J. Lee	8.50	1,075.00	9,137.50
Dennis A. Meloro	10.40	1,625.00	16,900.00
Nancy A. Peterman	24.60	1,835.00	45,141.00
Nancy A. Peterman	17.10	917.50	15,689.25
Kristen Jacobsen	24.30	1,000.00	24,300.00
Carla Greenberg	5.20	150.00	780.00
Total:	129.30	1,421.15	\$ 168,065.75

Exhibit B

(Expenses)

Invoice No.: 1001084028
 Re: SC Healthcare Holding, LLC, et al.
 Matter No.: 224973.010100

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Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
04/17/25	VENDOR: Parcels Inc - ACH INVOICE#: 1137510 DATE: 4/17/2025 Sales Order #874683. Courier service on 04/17/2025	\$ 15.00
04/17/25	VENDOR: Parcels Inc - ACH INVOICE#: 1137502 DATE: 4/17/2025 Sales Order #874713. Courier service on 04/17/25	\$ 15.00
05/14/25	ID# 8900905930775 Kemp/Danielle Susan Air/Rail Travel Agency Fee to Carrier- AIRLINES REPORTING CORPORATION.	\$ 32.00
05/25/25	GT Imaging Invoice 20250525-2557-1 Dated 05/25/25 - Re: Sc Healthcare Holding Creditors GÃ§Ã´ Sc Healthcare H (Relativity Hosting)	\$ 1,099.91
05/25/25	GT Imaging Invoice 20250525-2557-1 Dated 05/25/25 - Re: Sc Healthcare Holding Creditors GÃ§Ã´ Sc Healthcare H (Relativity User Fees)	\$ 1,950.00
05/29/25	ID# 8900895705485 Peterman/Nancy Air/Rail Travel Agency Fee to Carrier- AIRLINES REPORTING CORPORATION.	\$ 39.00
05/31/25	ID# 0167283453518 Peterman/Nancy Air/Rail Travel Agency Fee to ORD-PHL-ORD- Carrier- UNITED AIRLINESMIAMIFL	\$ 308.99
06/03/25	ID# 8900895705495 Peterman/Nancy Air/Rail Travel Agency Fee to Carrier- AIRLINES REPORTING CORPORATION.	\$ 39.00
06/03/25	VENDOR: Car Service - ACH INVOICE#: 5217 DATE: 6/6/2025 - Car Service Track No. 62618 for Nancy Peterman on 06/03/25 to PU: 3123 W PALMER, CHICAGO IL; DO: Chicago O'Hare International Airport, United Airlines - File Ref. 224973-010100	\$ 125.05
06/04/25	VENDOR: Peterman, Nancy A. INVOICE#: 110658 DATE: 6/18/2025 Meals (Other); 06/04/2025 Snack/coffee before attending hearing; Merchant: Bru HaHa; Attendees: Nancy Peterman	\$ 8.55
06/04/25	VENDOR: Car Service - ACH INVOICE#: 5217 DATE: 6/6/2025 - Car Service Track No. 62620 for Nancy Peterman on 06/04/25 to PU: Chicago O'Hare International Airport, United Airlines; DO: 3123 W PALMER, CHICAGO IL - File Ref. 224973-010100	\$ 138.50
06/04/25	VENDOR: Parcels Inc - ACH INVOICE#: 1145515 DATE: 6/4/2025 Sales Order #880964. Courier service on 06/04/25	\$ 15.00
06/04/25	VENDOR: Parcels Inc - ACH INVOICE#: 1145514 DATE: 6/4/2025 Sales Order #880942. Courier service on 6/4/2025	\$ 15.00
06/04/25	VENDOR: Peterman, Nancy A. INVOICE#: 110658 DATE: 6/18/2025 Hotel; 06/04/2025 Hotel stay to attend client hearing; Merchant: Hotel DuPont	\$ 405.90
06/05/25	ID# 8900895705500 Peterman/Nancy Air/Rail Travel Agency Fee to Carrier- AIRLINES REPORTING CORPORATION.	\$ 39.00
06/07/25	ID# 0167283453543 Peterman/Nancy Air/Rail Travel Agency Fee to ORD/PHL/ORD Carrier- UNITED AIRLINES INC	\$ 1,387.54
06/07/25	ID# 8900895806450 Peterman/Nancy Air/Rail Travel Agency Fee to Carrier- AIRLINES REPORTING CORPORATION.	\$ 39.00
06/09/25	VENDOR: Peterman, Nancy A. INVOICE#: 110657 DATE: 6/18/2025 Hotel; 06/09/2025 Hotel stay to attend client hearing; Merchant: The Quoin Hotel	\$ 315.81
06/10/25	VENDOR: Peterman, Nancy A. INVOICE#: 110658 DATE: 6/18/2025 Meals (Other); 06/10/2025 Snack/coffee before attending hearing; Merchant: Bru HaHa; Attendees: Nancy Peterman	\$ 8.55

Invoice No.: 1001084028
Re: SC Healthcare Holding, LLC, et al.
Matter No.: 224973.010100

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Description of Expenses Billed

06/10/25	VENDOR: Parcels Inc - ACH INVOICE#: 1146539 DATE: 6/10/2025 Date of job: 06/10/2025; Courier	\$	15.00
06/10/25	VENDOR: Parcels Inc - ACH INVOICE#: 1146543 DATE: 6/10/2025 Date of job: 06/10/2025; Courier; Downtown Delivery/Pickup	\$	15.00
Total Expenses:		\$	6,026.80

**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: Aug. 8, 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 *Fifteenth 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 June 1, 2025 through June 30, 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, **August 11, 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.

[Remainder of page intentionally left blank.]

Dated: July 28, 2025

GREENBERG TRAURIG, LLP

/s/ Dennis A. Meloro

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-and-

Nancy A. Peterman (admitted *pro hac vice*)
Danny Duerdoth (admitted *pro hac vice*)
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**COUNSEL FOR THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS**