

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

In re:	Chapter 11
SC HEALTHCARE HOLDING, LLC, <i>et al.</i> , ¹	Case No. 24-10443 (TMH)
Debtors.	(Jointly Administered)
Obj. Deadline: August 12, 2025 at 4:00 p.m.	

**FOURTEENTH MONTHLY FEE APPLICATION OF PORZIO, BROMBERG &
NEWMAN, P.C. AS COUNSEL FOR THE PATIENT CARE OMBUDSMAN, FOR
ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES
FOR THE PERIOD OF MAY 1, 2025 THROUGH MAY 31, 2025**

Name of Applicant: Porzio, Bromberg & Newman, P.C.

Authorized to Provide
Professional Services to: Suzanne Koenig, Patient Care Ombudsman

Date of Retention: May 24, 2024 *nunc pro tunc* to April 18, 2024

Period for which compensation
and reimbursement is sought: May 1, 2025 through May 31, 2025

Amount of Compensation sought as
actual, reasonable and necessary
legal services rendered: \$18,936.00

Amount of Expense Reimbursement
sought as actual, reasonable and
necessary: \$339.73

This is a(n): X monthly interim final application

¹The 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.



Prior Applications:

Dated Filed	Period Covered	Requested		Approved	
		Fees	Expenses	Fees	Expenses
6/6/2024	April 18, 2024 through April 30, 2024	\$29,313.50	\$50.00	\$29,313.50	\$50.00
7/11/2024	May 1, 2024 through May 31, 2024	\$58,328.50	\$502.00	\$58,328.50	\$502.00
8/9/2024	June 1, 2024 through June 30, 2024	\$49,695.50	\$327.72	\$49,695.50	\$327.72
9/16/2024	July 1, 2024 through July 31, 2024	\$38,666.00	\$2,392.49	\$38,666.00	\$2,392.49
10/28/2024	August 1, 2024 through August 31, 2024	\$46,143.50	\$190.76	\$46,143.80	\$190.76
10/31/2024	September 1, 2024 through September 30, 2024	\$24,960.50	\$1,554.51	\$24,960.50	\$1,554.51
12/20/2024	October 1, 2024 through October 31, 2024	\$55,444.00	\$19.70	\$55,444.00	\$19.70
12/27/2024	November 1, 2024 through November 30, 2024	\$44,972.00	\$1,381.64	\$44,927.00	\$1,381.64
2/11/2025	December 1, 2024 through December 31, 2024	\$49,924.00	\$55.12	\$49,924.00	\$55.12
3/17/2025	January 1, 2025 through January 31, 2025	\$26,504.00	\$1,129.26	\$26,504.00	\$1,129.26
4/11/2025	February 1, 2025 through February 28, 2025	\$50,382.00	\$192.84	\$50,382.00	\$192.84
5/14/2025	March 1, 2025 through March 31, 2025	\$14,647.50	\$1,877.88	\$14,647.50	\$1,877.88
5/14/2025	April 1, 2025 through April 30, 2025	\$30,897.50	\$223.24	\$24,718.00	\$223.24

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

In re:

SC HEALTHCARE HOLDING, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 24-10443 (TMH)

(Jointly Administered)

Obj. Deadline: August 12, 2025 at 4:00 p.m.

**FOURTEENTH MONTHLY FEE APPLICATION OF PORZIO, BROMBERG &
NEWMAN, P.C. AS COUNSEL FOR THE PATIENT CARE OMBUDSMAN,
FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF
EXPENSES FOR THE PERIOD OF MAY 1, 2025 THROUGH MAY 31, 2025**

Porzio, Bromberg & Newman, P.C. (“Porzio”), counsel to Suzanne Koenig, the patient care ombudsman (the “Ombudsman”) appointed in the above above-captioned chapter 11 cases (the “Chapter 11 Cases”) of SC Healthcare Holding, LLC, *et al.* (collectively, the “Debtors”), hereby submits its fourteenth monthly fee application (the “Application”) for entry of an order pursuant to sections 330 and 331 of title 11 of the United States Code, 11 U.S.C. §§101 et seq., as amended (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rule 2016-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Bankruptcy Rules”), the United States Trustee’s Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses filed under 11 U.S.C. § 330, effective January 30, 1996 (the “U.S. Trustee Guidelines”), and the Interim Compensation Order (defined below), for allowance of compensation for services rendered in the amount of \$18,936.00 and reimbursement of expenses

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in the amount \$339.73 for the period from May 1, 2025 through May 31, 2025 (the “Compensation Period”), and in support thereof, respectfully represents as follows:

JURISDICTION AND VENUE

1. This Court has jurisdiction over this Application pursuant to 28 U.S.C. §1334. This is a core proceeding pursuant to 28 U.S.C. §157(b)(2)(A) and (B).

2. Venue of this proceeding and this Application is proper in this District pursuant to 28 U.S.C. §§1408 and 1409.

3. The statutory predicates for the relief sought herein are sections 330 and 331 of the Bankruptcy Code, Bankruptcy Rule 2016 and Local Bankruptcy Rule 2016-2.

BACKGROUND

4. On March 20, 2024, (the “Petition Date”), the Debtors each commenced the above-captioned Chapter 11 Cases by filing voluntary petitions for relief under chapter 11 of the Bankruptcy Code.

5. The Debtors, with the exception of some inactive entities, are authorized to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee or examiner has been appointed in the Chapter 11 Cases.

6. On April 10, 2024, the U.S. Trustee filed the *Concurred in Application Regarding Order Pursuant to 11 U.S.C. § 333 and Fed. R. Bankr. P. 2007.2 Directing the Appointment of a Patient Care Ombudsman* [D.I. 136] (the “Ombudsman Application”).

7. On April 10, 2024, the Court entered the *Order Pursuant to Pursuant to 11 U.S.C. § 333 and Fed. R. Bankr. P. 2007.2 Directing the Appointment of a Patient Care Ombudsman* [D.I. 137] (the “Ombudsman Order”).

8. On April 16, 2024, the U.S. Trustee filed the *Notice of Appointment of Patient Care Ombudsman Under 11 U.S.C. § 333* [D.I. 160] (the “Ombudsman Appointment”), appointing Suzanne Koenig as the Ombudsman.

9. On May 8, 2024, the Ombudsman filed an application seeking the retention of Porzio as counsel for the Ombudsman *nunc pro tunc* to April 18, 2024 [D.I. 274] (the “Porzio Retention Application”). A Certification of No Objection regarding the Porzio Retention Application was filed on May 23, 2024 [D.I. 350]. The Order approving the Porzio Retention Application was entered on May 24, 2024 [D.I. 364].

10. On April 9, 2024, the Debtors filed the *Debtors’ Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [D.I. 133] (the “Interim Compensation Motion”). The Order approving the Interim Compensation Motion was entered on April 23, 2024 [D.I. 235] (the “Interim Compensation Order”), which sets forth the procedures for interim compensation and reimbursement of expenses in these Chapter 11 Cases. Specifically, the Interim Compensation Order provides, among other things, that a Professional may file and serve a monthly fee application (the “Monthly Fee Application”) on or after the tenth (10th) day of each month following the month for which compensation is sought. Provided that there are no objections to the Monthly Fee Application filed within fourteen (14) days after the service of a Monthly Fee Application, the Professional may file a certificate of no objection with the Court, after which the Debtors are authorized to pay such Professional eighty percent (80%) of the fees and one-hundred percent (100%) of the expenses requested in such Monthly Fee Application. If an objection is filed to the Monthly Fee Application, then the Debtors are authorized to pay 80% of the fees and 100% of the expenses not subject to objection.

RELIEF REQUESTED

11. Pursuant to the Interim Compensation Order and Bankruptcy Code section 331, Porzio is seeking compensation in the amount of \$15,148.80 which is equal to 80% of the \$18,936.00 in fees for professional services rendered by Porzio during the Compensation Period. This amount is derived solely from the applicable hourly billing rates of Porzio's personnel who rendered such services to the Ombudsman. In addition, Porzio is seeking reimbursement of expenses incurred during the Compensation Period in the amount of \$339.73.

A. Compensation Requested

12. Attached as **Exhibit A** is a full and detailed statement describing the services rendered by each professional and paraprofessional at Porzio during the Compensation Period, along with the number of hours for each individual and the total compensation sought for each category. Porzio contends that this detailed itemization complies with Local Bankruptcy Rule 2016-2(d).

B. Expense Reimbursement

13. Porzio incurred \$339.73 of out-of-pocket expenses during the Compensation Period. A chart detailing and breaking out the specific disbursements is attached hereto as **Exhibit B**.

VALUATION OF SERVICES

14. Attorneys and paraprofessionals of Porzio have expended a total of 29.30 hours in connection with this matter during the Compensation Period. The Ombudsman's professionals have monitored and continue to monitor the bankruptcy cases and information relating to resident and patient records for matters pertaining to resident and patient interests as further reflected in the detailed time entries attached hereto as **Exhibit A**.

15. The amount of time spent by each of the professionals providing services to the Ombudsman for the Compensation Period is set forth in **Exhibit A** hereto. The rates are Porzio's normal hourly rates of compensation for work of this character. The reasonable value of the services rendered by Porzio for the Compensation Period as counsel for the Ombudsman in these cases is \$18,936.00.

16. In accordance with the factors enumerated in Bankruptcy Code section 330, Porzio contends that the amount requested is fair and reasonable given (i) the complexity of these cases, (ii) the time expended, (iii) the nature and extent of the services rendered, (iv) the value of such services and (v) the costs of comparable services other than in a case under this title. Porzio's fees are reasonable and appropriate under the applicable legal standard, and should therefore be allowed.

17. Porzio believes that the time entries included in **Exhibit A** and the expense breakdown set forth in **Exhibit B** are in compliance with the requirements of Local Bankruptcy Rule 2016-2.

NO PRIOR REQUEST

18. No prior request for the relief sought in the Application has been made to this or any other court.

CERTIFICATE OF COMPLIANCE AND WAIVER

19. The undersigned representative of Porzio certifies that she has reviewed the requirements of Local Bankruptcy Rule 2016-2 and that the Application substantially complies with that Local Bankruptcy Rule. To the extent that the Application does not comply in all respects with the requirements of Local Bankruptcy Rule 2016-2, Porzio believes that such deviations are not material and respectfully requests that any such requirements be waived.

WHEREFORE, Porzio hereby requests pursuant to the procedures allowed in the Interim Compensation Order: (i) allowance of compensation for necessary and valuable professional services rendered to the Ombudsman in the amount of \$18,936.00 for the period from May 1, 2025 through May 31, 2025; (ii) payment in the total amount of \$15,488.53 (representing 80% of the total fees (\$15,148.80) billed and 100% of the expenses (\$339.73) incurred during the Compensation Period); and (iii) such other relief as this Court deems just and proper.

Date: July 29, 2025

/s/ Cheryl A. Santaniello

Cheryl A. Santaniello, Esq. (DE Bar No. 5062)
Porzio, Bromberg & Newman, P.C.
300 Delaware Avenue, Suite 1220
Wilmington, Delaware 19801
Telephone: (302) 526-1235
Facsimile: (302) 416-6064
Email: casantaniello@pbnlaw.com

-and-

Robert M. Schechter, Esq. (*pro hac vice*)
Christopher P. Mazza, Esq. (*pro hac vice*)
Porzio, Bromberg & Newman, P.C.
100 Southgate Parkway
P.O. Box. 1997
Morristown, New Jersey 07962
Telephone: (973) 538-4006
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Email: rmschechter@pbnlaw.com
Email: cpmazza@pbnlaw.com

Counsel for the Patient Care Ombudsman

EXHIBIT A

Timekeeper Summary – May 1, 2025 – May 31, 2025

Timekeeper	Position	Rate	Hours	Amount
Robert M. Schechter	Principal in Bankruptcy Department since 2014, Member of NJ Bar since 2005	\$925.00	9.10	\$8,417.50
Cheryl A. Santaniello	Principal in Bankruptcy Department since 2020, Member of DE Bar since 2007	\$875.00	2.00	\$1,750.00
Michael F. Medved	Associate in Bankruptcy Department since 2024, Member of CA Bar 2021	\$620.00	5.30	\$3,286.00
Jessica M. O'Connor	Paralegal in Bankruptcy Department since 2020	\$425.00	12.90	\$5,482.50
Totals:			29.30	\$18,936.00
Blended Rate:			\$646	

Compensation By Category – May 1, 2025 – May 31, 2025

Project Category		
Business Operations	0.60	\$555.00
Case Administration	1.90	\$1,391.50
Claims Administration and Objections	0.90	\$832.50
Fee/Employment Applications	18.50	\$10,174.50
Fee/Employment Objections	0.50	\$362.50
Financing	1.40	\$1,240.00
Plan and Disclosure Statement	5.50	\$4,380.00
Totals	29.30	\$18,936.00



100 SOUTHGATE PARKWAY, PO Box 1997
MORRISTOWN, NJ 07962-1997
TEL (973) 538-4006
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June 13, 2025

Suzanne Koenig
300 Saunders Road
Riverwoods, IL 60015

Invoice # 3335879

Re: *SC Healthcare Holding, LLC, et al.*
Our Matter # 026646.099904
Billing Attorney: Robert M. Schechter

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 05/31/25

Professional Services	18,936.00
Disbursements	339.73
TOTAL CURRENT INVOICE	\$19,275.73
Previous Balance Due	63,023.32
TOTAL BALANCE DUE	\$82,299.05

Please make check payable to Porzio, Bromberg & Newman, P.C.

REMITTANCE PAGE



100 SOUTHGATE PARKWAY, PO BOX 1997
MORRISTOWN, NJ 07962-1997
TEL (973) 538-4006
FAX (973) 538-5146
TAX ID: 22-2005150

June 13, 2025

Suzanne Koenig
300 Saunders Road
Riverwoods, IL 60015

Invoice # 3335879

Re: *SC Healthcare Holding, LLC, et al.*
Our Matter # 026646.099904
Billing Attorney: Robert M. Schechter

AGGREGATE TIME SUMMARY BY TASK CODE

<u>Task Code</u>	<u>Task Description</u>	<u>Total Hours</u>	<u>Total Amount</u>
BUSOPS	Business Operations	0.60	555.00
CASEADMN	Case Administration	1.90	1,391.50
CLAIMS	Claims Administration and Objections	0.90	832.50
FEEAPPS	Fee/Employment Applications	18.50	10,174.50
FEEOBS	Fee/Employment Objections	0.50	362.50
FINANCE	Financing	1.40	1,240.00
PLANDSCL	Plan and Disclosure Statement	5.50	4,380.00
Total		<u>29.30</u>	<u>18,936.00</u>

AGGREGATE TIME SUMMARY BY TASK CODE BY TIMEKEEPER

<u>Task Code</u>	<u>Timekeeper</u>	<u>Title</u>	<u>Total Hours</u>	<u>Hourly Rate</u>	<u>Total</u>
Business Operations					
BUSOPS	Schechter, R. M.	Principal	0.60	925.00	555.00
Business Operations					
Total			0.60		555.00
Case Administration					
CASEADMN	Schechter, R. M.	Principal	0.70	925.00	647.50
	Medved, M. F.	Associate 1	1.20	620.00	744.00
Case Administration					
Total			1.90		1,391.50

Claims Administration and Objections

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<u>Task Code</u>	<u>Timekeeper</u>	<u>Title</u>	<u>Total Hours</u>	<u>Hourly Rate</u>	<u>Total</u>
CLAIMS	Schechter, R. M.	Principal	0.90	925.00	832.50
Claims Administration and Objections					
Total			0.90		832.50
Fee/Employment Applications					
FEEAPPS	Schechter, R. M.	Principal	2.80	925.00	2,590.00
	OConnor, J. M.	Paralegal - 2 - Senior Level	12.20	425.00	5,185.00
	Santaniello, C. A.	Principal	0.90	875.00	787.50
	Medved, M. F.	Associate 1	2.60	620.00	1,612.00
Fee/Employment Applications					
Total			18.50		10,174.50
Fee/Employment Objections					
FEEOBS	Schechter, R. M.	Principal	0.30	925.00	277.50
	OConnor, J. M.	Paralegal - 2 - Senior Level	0.20	425.00	85.00
Fee/Employment Objections					
Total			0.50		362.50
Financing					
FINANCE	Schechter, R. M.	Principal	0.30	925.00	277.50
	Santaniello, C. A.	Principal	1.10	875.00	962.50
Financing					
Total			1.40		1,240.00
Plan and Disclosure Statement					
PLANDSCL	Schechter, R. M.	Principal	3.50	925.00	3,237.50
	OConnor, J. M.	Paralegal - 2 - Senior Level	0.50	425.00	212.50
	Medved, M. F.	Associate 1	1.50	620.00	930.00
Plan and Disclosure Statement					
Total			5.50		4,380.00
Total			29.30		18,936.00

AGGREGATE TIME SUMMARY PAGE BY INDIVIDUAL

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<u>Task Code</u>	<u>Timekeeper</u>	<u>Title</u>	<u>Total Hours</u>	<u>Hourly Rate</u>	<u>Total</u>
0694	Schechter, R. M.	Principal	9.10	925.00	8,417.50
2624	OConnor, J. M.	Paralegal - 2 - Senior Level	12.90	425.00	5,482.50
2625	Santaniello, C. A.	Principal	2.00	875.00	1,750.00
2827	Medved, M. F.	Associate 1	5.30	620.00	3,286.00
	Total		29.30		18,936.00

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Time Detail

<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
05/23/25	Review monthly operating report and periodic report pursuant to 2015.3	RMS	BUSOPS	0.60	555.00
BUSOPS Total				0.60	555.00
05/12/25	Review of additional plan documents on document retention language.	MFM	CASEADMN	0.40	248.00
05/27/25	Review D. Campbell declaration in connection with conversion motion.	RMS	CASEADMN	0.10	92.50
05/27/25	Review motion to convert.	RMS	CASEADMN	0.20	185.00
05/27/25	Review Wells Fargo witness and exhibit list.	RMS	CASEADMN	0.10	92.50
05/28/25	Communications regarding status of case, administrative claims and plan process.	RMS	CASEADMN	0.20	185.00
05/28/25	Review hearing agenda.	RMS	CASEADMN	0.10	92.50
05/29/25	Drafted update to client on conversion motion and fee objection.	MFM	CASEADMN	0.80	496.00
CASEADMN Total				1.90	1,391.50
05/21/25	Review Wells Fargo and Berkadia superpriority administrative claim motions in connection with potential open plan confirmation issues.	RMS	CLAIMS	0.70	647.50
05/21/25	Review Hartford Insurance claim filing.	RMS	CLAIMS	0.20	185.00
CLAIMS Total				0.90	832.50
05/01/25	Emails to and from internal team regarding filing CNOs to February Monthly Fee Statements	JMO	FEEAPPS	0.20	85.00
05/02/25	Continue drafting Fourth Interim Fee Application of SAK	JMO	FEEAPPS	0.80	340.00
05/07/25	Emails to and from C. Santaniello regarding filing CNOs to February Monthly Fee Statements	JMO	FEEAPPS	0.20	85.00
05/07/25	Emails to and from internal team regarding Fourth Interims and March Monthly fee statements	JMO	FEEAPPS	0.30	127.50
05/07/25	Prepare and file CNO to February Monthly Fee Statement of PBN	JMO	FEEAPPS	0.20	85.00
05/07/25	Prepare and file CNO to February Monthly Fee Statement of SAK	JMO	FEEAPPS	0.20	85.00

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<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
05/07/25	Communications regarding interim fee application.	RMS	FEEAPPS	0.10	92.50
05/09/25	Communicate with client regarding interim fee applications.	RMS	FEEAPPS	0.10	92.50
05/12/25	Emails from R. Schechter and S. Koenig regarding March Monthly Fee Statement of SAK and Fourth Interim Fee Apps	JMO	FEEAPPS	0.30	127.50
05/13/25	Email from J. Meyerowitz regarding March & April Monthly Fee Statements of SAK	JMO	FEEAPPS	0.10	42.50
05/13/25	Draft March Monthly of SAK	JMO	FEEAPPS	0.50	212.50
05/13/25	Email to M. Medved regarding draft March Monthly of SAK	JMO	FEEAPPS	0.10	42.50
05/13/25	Finish drafting Fourth Interim Fee Application of SAK	JMO	FEEAPPS	0.60	255.00
05/13/25	Email to internal team regarding draft Fourth Interim Fee Application of SAK	JMO	FEEAPPS	0.10	42.50
05/13/25	Review status of monthly and intern fee application filings for SAK and Porzio (.1), review information relating to same and in preparation for filings tomorrow (.3), correspondence regarding preparation of applications (.1).	RMS	FEEAPPS	0.50	462.50
05/14/25	Review monthly and interim fee applications of Porzio	CAS	FEEAPPS	0.30	262.50
05/14/25	Review interim and monthly fee applications of SAK	CAS	FEEAPPS	0.30	262.50
05/14/25	Exchange and review of emails with J. O'Connor and M. Medved regarding edits to fee applications of Porzio and SAK (5xs)	CAS	FEEAPPS	0.30	262.50
05/14/25	Email from R. Schechter regarding drafting April Monthly Fee Statements	JMO	FEEAPPS	0.10	42.50
05/14/25	Finish drafting Fourth Interim Fee Application of PBN	JMO	FEEAPPS	1.20	510.00
05/14/25	Email to internal team regarding draft Fourth Interim Fee Application of PBN	JMO	FEEAPPS	0.10	42.50
05/14/25	Draft April Monthly Fee Statement of PBN	JMO	FEEAPPS	0.80	340.00
05/14/25	Email to internal team regarding draft April Monthly Fee Statement of PBN	JMO	FEEAPPS	0.10	42.50
05/14/25	Draft April Monthly Fee Statement of SAK	JMO	FEEAPPS	0.60	255.00
05/14/25	Email to internal team regarding draft April Monthly of SAK	JMO	FEEAPPS	0.10	42.50

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<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
05/14/25	Email to internal team regarding March & April Monthlies & Fourth Interims	JMO	FEEAPPS	0.10	42.50
05/14/25	Emails from R. Schechter regarding edits to March and April Monthly Fee Statements of PBN & SAK	JMO	FEEAPPS	0.20	85.00
05/14/25	Emails to and from C. Santaniello regarding filing of March & April Monthlies	JMO	FEEAPPS	0.20	85.00
05/14/25	Emails from and to R. Schechter regarding Fourth Interim Fee Applications and edits to same	JMO	FEEAPPS	0.40	170.00
05/14/25	Edit March Monthly Fee Statement of SAK	JMO	FEEAPPS	0.10	42.50
05/14/25	Edit April Monthly Fee Statement of SAK	JMO	FEEAPPS	0.10	42.50
05/14/25	Edit March Monthly Fee Statement of PBN	JMO	FEEAPPS	0.10	42.50
05/14/25	Edit April Monthly Fee Statement of PBN	JMO	FEEAPPS	0.10	42.50
05/14/25	Finalize March Monthly Fee Statement of PBN	JMO	FEEAPPS	0.30	127.50
05/14/25	Finalize April Monthly Fee Statement of PBN	JMO	FEEAPPS	0.30	127.50
05/14/25	Finalize March Monthly Fee Statement of SAK	JMO	FEEAPPS	0.30	127.50
05/14/25	Finalize April Monthly Fee Statement of SAK	JMO	FEEAPPS	0.30	127.50
05/14/25	File March Monthly Fee Statement of PBN	JMO	FEEAPPS	0.10	42.50
05/14/25	File March Monthly Fee Statement of SAK	JMO	FEEAPPS	0.10	42.50
05/14/25	File April Monthly Fee Statement of PBN	JMO	FEEAPPS	0.10	42.50
05/14/25	File April Monthly Fee Statement of SAK	JMO	FEEAPPS	0.10	42.50
05/14/25	Update objection deadline calendar regarding filed March & April Monthly Fee Statements of PBN & SAK	JMO	FEEAPPS	0.10	42.50
05/14/25	Service regarding filed March & April Monthly Fee Statements of PBN & SAK	JMO	FEEAPPS	0.10	42.50
05/14/25	Call with C. Santaniello regarding March & April Monthly & Fourth Interim Fee Applications	JMO	FEEAPPS	0.20	85.00
05/14/25	Emails from internal team regarding edits to Fourth Interim Fee Application	JMO	FEEAPPS	0.50	212.50

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<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
05/14/25	of SAK & PBN Finalize Fourth Interim Fee Application of SAK	JMO	FEEAPPS	0.20	85.00
05/14/25	Finalize Fourth Interim Fee Application of PBN	JMO	FEEAPPS	0.30	127.50
05/14/25	File Fourth Interim Fee Application of PBN	JMO	FEEAPPS	0.20	85.00
05/14/25	File Fourth Interim Fee Application of SAK	JMO	FEEAPPS	0.20	85.00
05/14/25	Update objection deadline calendar regarding filed Fourth Interim Fee Applications of PBN & SAK	JMO	FEEAPPS	0.10	42.50
05/14/25	Edited client interim fee application.	MFM	FEEAPPS	0.80	496.00
05/14/25	Edited interim fee application.	MFM	FEEAPPS	1.40	868.00
05/14/25	Review and revise SAK and Porzio interim fee applications.	RMS	FEEAPPS	1.60	1,480.00
05/14/25	Review and revise SAK and Porzio monthly fee applications.	RMS	FEEAPPS	0.20	185.00
05/14/25	Communications with PCO regarding interim and monthly fee applications.	RMS	FEEAPPS	0.10	92.50
05/15/25	Communications regarding SAK and Porzio payments, outstanding amounts and plan timeline.	RMS	FEEAPPS	0.10	92.50
05/19/25	Communicate with PCO regarding interim fee applications	RMS	FEEAPPS	0.10	92.50
05/28/25	Draft Notice of Hearing on Fourth Interim Fee Applications; email same to internal team	JMO	FEEAPPS	0.40	170.00
05/29/25	Emails to and from M. Medved, R. Schechter and C. Santaniello regarding edits and filing of Notice of Hearing of Fourth Interim Fee Apps	JMO	FEEAPPS	0.40	170.00
05/29/25	Reviewed notice of hearing on fee applications.	MFM	FEEAPPS	0.40	248.00
FEEAPPS Total				18.50	10,174.50
05/28/25	Review Wells Fargo Omnibus Fee Objection	JMO	FEEOBS	0.10	42.50
05/28/25	Email to internal team regarding Wells Fargo Omnibus Fee Objection	JMO	FEEOBS	0.10	42.50
05/28/25	Review Wells Fargo omnibus fee objection.	RMS	FEEOBS	0.10	92.50
05/29/25	Communications regarding notice of hearing.	RMS	FEEOBS	0.10	92.50
05/30/25	Review Wells Fargo Exhibit amendment	RMS	FEEOBS	0.10	92.50

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<u>Date</u>	<u>Description</u> to fee objection.	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
FEEOBJ Total				0.50	362.50
05/15/25	Review and authorize pleadings	CAS	FINANCE	0.40	350.00
05/19/25	Review applications of Porzio and SAK.	CAS	FINANCE	0.50	437.50
05/28/25	Review MOR.	RMS	FINANCE	0.30	277.50
05/29/25	Review objection of Wells Fargo to Professional Fee Applications (.1); email to J.O'Connor regarding foregoing.	CAS	FINANCE	0.20	175.00
FINANCE Total				1.40	1,240.00
05/09/25	Review plan supplement for any information relating to handling of resident and patient records.	RMS	PLANDSCL	1.30	1,202.50
05/16/25	Review Petersen discovery notices in advance of confirmation.	RMS	PLANDSCL	0.10	92.50
05/20/25	Followed up with counsel for debtor on status of plan.	MFM	PLANDSCL	0.30	186.00
05/20/25	Draft correspondence to Michael Medved regarding upcoming plan confirmation hearing and plan related documents.	RMS	PLANDSCL	0.10	92.50
05/23/25	Review limited objection to confirmation.	RMS	PLANDSCL	0.10	92.50
05/23/25	Review UST plan objection.	RMS	PLANDSCL	0.10	92.50
05/23/25	Review Berkadia plan objection.	RMS	PLANDSCL	0.10	92.50
05/23/25	Review Wells Fargo and Hartford Insurance plan objections.	RMS	PLANDSCL	0.70	647.50
05/27/25	Communications regarding confirmation hearing.	RMS	PLANDSCL	0.10	92.50
05/27/25	Review Debtors' witness and exhibit list.	RMS	PLANDSCL	0.20	185.00
05/27/25	Review Hartford Insurance witness and exhibit list.	RMS	PLANDSCL	0.10	92.50
05/28/25	Coordinate confirmation hearing attendance	JMO	PLANDSCL	0.20	85.00
05/28/25	Review Notice of Adjourned Confirmation Hearing	JMO	PLANDSCL	0.10	42.50
05/28/25	Email to internal team regarding Notice of Adjourned Confirmation Hearing	JMO	PLANDSCL	0.10	42.50
05/28/25	Update hearing calendar regarding Notice of Adjourned Confirmation Hearing	JMO	PLANDSCL	0.10	42.50
05/28/25	Review of conversion motion and objection to fee application.	MFM	PLANDSCL	1.20	744.00
05/28/25	Communications regarding confirmation	RMS	PLANDSCL	0.10	92.50

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<u>Date</u>	<u>Description</u>	<u>Initials</u>	<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
05/28/25	hearing. Review Mark Petersen and Committee confirmation objections.	RMS	PLANDSCL	0.40	370.00
05/30/25	Review motion to shorten time on conversion if plan is not confirmed.	RMS	PLANDSCL	0.10	92.50
PLANDSCL Total				<u>5.50</u>	<u>4,380.00</u>
Fees Total				<u>29.30</u>	<u>18,936.00</u>

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Disbursement Summary	Total
Filing Fees	50.00
Service fees	289.73
Total Disbursements	339.73

Disbursement Detail

Date	Description	Amount
04/14/25	VENDOR: American Express INVOICE#: SANTANIELLO050825 DATE: 5/19/2025 Expense Reimbursement - pro hac fees for Kim	50.00
05/19/25	VENDOR: Parcels Inc INVOICE#: 1141962 DATE: 5/16/2025 Parcels Inc 1141962 05/16/25 Service of filed Fourth Interim Fee Apps of PBN & SAK	124.15
05/19/25	VENDOR: Parcels Inc INVOICE#: 1141937 DATE: 5/16/2025 Parcels Inc 1141937 05/16/25 Service of filed March & April Monthly Fee Statements of PBN & SAK	165.58
TOTAL DISBURSEMENTS		\$339.73

TOTALS FOR THIS MATTER

Professional Services	18,936.00
Disbursements	339.73
Total Professional Services & Disbursements	19,275.73

BALANCE DUE THIS INVOICE	\$ 19,275.73
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Previous Balance Due	63,023.32
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TOTAL AMOUNT DUE INCLUDING THIS INVOICE	\$ 82,299.05
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ACCOUNTS RECEIVABLE

INVOICE DATE	INVOICE NUMBER	INVOICE TOTAL	OUTSTANDING BALANCE
01/23/25	3328649	49,979.12	9,984.80
02/19/25	3329672	27,633.26	5,300.80
03/14/25	3330988	50,574.84	10,076.40
04/14/25	3332731	16,525.38	6,540.58

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05/14/25	3334128	31,120.74	31,120.74
	CURRENT BALANCE DUE	\$175,833.34	\$63,023.32

EXHIBIT B

Summary of Expenses – May 1, 2025 – May 31, 2025

DISBURSEMENTS	AMOUNT
a) Filing/Court Fees Payable to Clerk of Court. (Admission Fees)	\$50.00
b) Computer Assisted Legal Research Westlaw, Lexis and a description of manner calculated.	\$0.00
c) Pacer Fees Payable to the Pacer Service Center for search and/or print.	\$0.00
d) Fax (with rates) No. of Pages ____ Rate per Page ____ (Max. \$1.00/pg.)	\$0.00
e) Case Specific Telephone / Conference Call Charges Exclusive of overhead charges.	\$0.00
f) In-House Reproduction Services Exclusive of overhead charges.	\$0.00
g) Outside Reproduction Services Including scanning services.	\$289.73
h) Other Research Title searches, UCC searches, Asset searches, Accurint.	\$0.00
i) Court Reporting / Deposition Services Transcripts.	\$0.00
j) Travel Mileage, rolls, airfare and parking.	\$0.00
k) Courier & Express Carriers Overnight and personal delivery	\$0.00
l) Postage	\$0.00
m) Other (specify) – Business Meals	\$0.00
DISBURSEMENTS TOTAL:	\$339.73

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

In re:

SC HEALTHCARE HOLDING, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 24-10443 (TMH)

(Jointly Administered)

Obj. Deadline: August 12, 2025 at 4:00 p.m.

**NOTICE OF FOURTEENTH MONTHLY FEE APPLICATION OF PORZIO,
BROMBERG & NEWMAN, P.C. AS COUNSEL FOR THE PATIENT CARE
OMBUDSMAN, FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT
OF EXPENSES FOR THE PERIOD OF MAY 1, 2025 THROUGH MAY 31, 2025**

PLEASE TAKE NOTICE that, on July 29, 2025, Porzio, Bromberg & Newman, P.C. (“Porzio”), counsel for Suzanne Koenig, the patient care ombudsman (the “Ombudsman”), filed its Fourteenth Monthly Fee Application (the “Application”) for Allowance of Compensation and Reimbursement of Expenses for the Services Rendered for the Period of May 1, 2025, through May 31, 2025.

If you object to the relief sought by the Application, you are required to file a response to the Application, on or before **August 12, 2025, 4:00 p.m. (ET)**. At the same time, you must also serve a copy of the response upon the Ombudsman’s counsel:

Cheryl A. Santaniello, Esq. (DE Bar No. 5062)
Porzio, Bromberg & Newman, P.C.
300 Delaware Avenue, Suite 1220
Wilmington, DE 19801
Telephone: (302) 526-1235
Facsimile: (302) 416-6064
E-mail: casantaniello@pbnlaw.com

Robert M. Schechter, Esq. (*pro hac vice*)
Christopher P. Mazza, Esq. (*pro hac vice*)
Porzio, Bromberg & Newman, P.C.
100 Southgate Parkway
P.O. Box. 1997
Morristown, New Jersey 07962
Telephone: (973) 538-4006
Facsimile: (973) 538-5146
E-mail: rmschechter@pbnlaw.com
E-mail: cpmazza@pbnlaw.com

¹The 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.

PLEASE TAKE FURTHER NOTICE THAT IF NO OBJECTIONS ARE FILED AND SERVED IN ACCORDANCE WITH THE ABOVE PROCEDURES, THEN 80% OF FEES AND 100% OF THE EXPENSES REQUESTED IN THE APPLICATION MAY BE PAID PURSUANT TO THE INTERIM COMPENSATION ORDER WITHOUT FURTHER HEARING OR ORDER OF THE COURT.

A HEARING ON THE APPLICATION WILL BE HELD ONLY IF OBJECTIONS ARE FILED, OR IF THE COURT DIRECTS OTHERWISE AT A DATE AND TIME TO BE SCHEDULED BY THE COURT.

Dated: July 29, 2025

/s/ Cheryl A. Santaniello
Cheryl A. Santaniello

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

In re:

SC HEALTHCARE HOLDING, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 24-10443 (TMH)

(Jointly Administered)

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of July, 2025, I caused to be filed with the Court electronically, and I caused to be served a true and correct copy of the:

**FOURTEENTH MONTHLY FEE APPLICATION OF PORZIO, BROMBERG &
NEWMAN, P.C. AS COUNSEL FOR THE PATIENT CARE OMBUDSMAN, FOR
ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES
FOR THE PERIOD OF MAY 1, 2025 THROUGH MAY 31, 2025**

upon the parties that are registered to receive notice via the Courts' CM/ECF notification system, and additional service was completed by U.S. First Class Mail on the parties listed on **Exhibit A.**

/s/ Cheryl A. Santaniello
Cheryl A. Santaniello

¹The 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.

EXHIBIT A

SC Healthcare Holding, LLC *et al.*
Attn: David R. Campbell
830 W. Trailcreek Drive
Peoria, IL 61614

Debtors

Winston & Strawn LLP
Attn: Gregory M. Gartland,
Daniel J. McGuire, Joel McKnight
Mudd
35 West Wacker Drive
Chicago, IL 60601

-and-

Winston & Strawn LLP
Attn: Carrie V. Hardman
200 Park Avenue
New York, NY 10166

Debtors' Counsel

Young Conaway Stargatt & Taylor,
LLP
Attn: Andrew L. Magaziner, Shella
Borovinskaya, Carol E. Cox
Rodney Square
1000 North King Street
Wilmington, DE 19801

Debtors' Counsel

Office of the United States Trustee
District of Delaware
Attn: Linda Richenderfer, Jon
Lipshie
844 King Street, Suite 2207
Lockbox 35
Wilmington, DE 19801

U.S. Trustee

Norton Rose Fulbright US LLP
Attn: Robert M. Hirsh, Emily Hong
1301 Avenue of the Americas New
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Counsel to DIP Lender

Morris James LLP
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Counsel to DIP Lender

Holland & Knight, LLP
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Counsel to Column Financial, Inc.

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Counsel to Column Financial, Inc.

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-and-

Greenberg Traurig, LLP
Attn: Shari L. Heyen
1000 Louisiana Street
Suite 6700
Houston, TX 77002

-and-

Greenberg Traurig, LLP
Attn: Anthony W. Clark, Dennis A.
Meloro
222 Delaware Avenue
Suite 1600
Wilmington, DE 19801

*Counsel to the Official Committee
of Unsecured Creditors*