

**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: August 12, 2025 at 4:00 p.m. (ET)

**SUMMARY OF SEVENTH FEE APPLICATION
OF DUANE MORRIS LLP, AS SPECIAL COUNSEL
TO THE DEBTORS AND DEBTORS IN POSSESSION,
FOR ALLOWANCE OF COMPENSATION AND
REIMBURSEMENT OF EXPENSES FOR THE PERIOD
FROM APRIL 1, 2025 THROUGH JUNE 30, 2025**

Name of Applicant:

Duane Morris LLP

Authorized to Provide Professional Services to:

Debtors and Debtors-in-Possession

Date of Retention:

June 20, 2024
(Effective as of May 1, 2024)

Period for which compensation and
reimbursement is sought:

April 1, 2025 – June 30, 2025

Amount of Compensation sought as
actual, reasonable and necessary:

\$59,461.00

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

\$0.00

This is an: x interim final application.

¹ The last four digits of SC Healthcare Holding, LLC's tax identification number are 2584. The mailing address for SC Healthcare Holding, LLC is c/o Petersen Health Care Management, LLC, P.O. Box 620, Delavan, IL 61734. Due to the large number of debtors in these Chapter 11 Cases, whose cases are being jointly administered, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information is available on a website of the Debtors' claims and noticing agent at www.kccllc.net/Petersen.



SUMMARY OF PRIOR APPLICATIONS

Date Filed, Docket No.	Period Covered	Requested (\$)		Approved (\$)		
		Fees	Expenses	Approved Fees	Approved Expenses	Order Entered
July 19, 2024 [Docket No. 678]	May 1, 2024 to June 30, 2024	\$357,605.50	\$0.00			
1 st Interim Fee Order		\$357,605.50	\$0.00	\$357,386.50 ²	\$0.00	Docket No. 872
October 25, 2024 [Docket No. 947]	July 1, 2024 to September 30, 2024	\$400,591.00	\$0.00			
2 nd Interim Fee Order	July 1, 2024 to September 30, 2024	\$400,591.00	\$0.00	\$386,232.00 ³	\$0.00	Docket No. 1123
December 19, 2024 [Docket No. 1098]	October 1, 2024 to November 30, 2024	\$460,427.50	\$608.53			
February 12, 2025 [Docket No. 1253]	December 1, 2024 to December 31, 2024	\$166,431.50	\$155.68			
3 rd Interim Fee Order	October 1, 2024 to December 31, 2024	\$626,859.00	\$764.21	\$606,688.50 ⁴	\$362.32	Docket No. 1359
April 17, 2025 [Docket No. 1405]	January 1, 2025 to February 28, 2025	\$93,994.50	\$57.63			
May 14, 2025 [Docket No. 1567]	March 1, 2025 to March 31, 2025	\$33,595.00	\$0.00			
4 th Interim Fee Order	January 1, 2025 to March 31, 2025	\$127,589.50	\$157.63	\$127,291.50 ⁵	\$57.63	Docket No. 1716

² Approved fees reflect a voluntary reduction of \$215.00.

³ Approved fees reflect a voluntary reduction of \$14,359.00.

⁴ Approved fees reflect a voluntary reduction of \$20,170.50.

⁵ Approved fees reflect a voluntary reduction of \$298.00.

COMPENSATION BY INDIVIDUAL

Name	Title, Department	Admission	Hourly Billing Rate	Total Billed Hours	Total Compensation
Ron Oliner	Partner, Bankruptcy and Restructuring	California, 1990	\$1,400	14.50	\$20,300.00
Michael A. Witt	Partner, Corporate	Illinois, 1995	\$1,125	13.70	\$15,413.00
Neville M. Bilimoria	Partner, Healthcare	Illinois, 1994	\$1,080	12.70	\$13,716.00
David B. Yelin	Partner, Real Estate	Illinois, 1986	\$1,260	1.20	\$1,512.00
Eric C. Fader	Special Counsel, Corporate	Illinois, 1998	\$1,075	1.60	\$1,720.00
Dietrich A. Loos	Special Counsel, Corporate	Illinois, 1998	\$1,020	1.10	\$1,122.00
Amy E. McCracken	Special Counsel, Health Law	Illinois, 1998	\$950	0.10	\$95.00
Drew S. McGehrin	Senior Associate, Bankruptcy and Restructuring	Pennsylvania, 2016, Delaware, 2017	\$775	5.30	\$4,108.00
Nathan Yeary	Associate, Bankruptcy and Restructuring	Illinois, 2021	\$615	2.40	\$1,476.00
	Grand Total:			52.60	\$59,461.00
	Blended Rate for All Timekeepers:		\$1,130.44		

COMPENSATION BY PROJECT CATEGORY

Project Category	Total Hours	Total Fees
Post Petition Sale Matters	52.60	\$59,461.00
TOTALS		

EXPENSE SUMMARY

Applicant has incurred a total of \$0.00 reimbursable expenses during the Fee Period.

Further detail can be found in the statements attached as **Exhibit A**.

**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: August 12, 2025 at 4:00 p.m. (ET)

**SUMMARY OF SEVENTH FEE APPLICATION
OF DUANE MORRIS LLP, AS SPECIAL COUNSEL
TO THE DEBTORS AND DEBTORS IN POSSESSION,
FOR ALLOWANCE OF COMPENSATION AND
REIMBURSEMENT OF EXPENSES FOR THE PERIOD
FROM APRIL 1, 2025 THROUGH JUNE 30, 2025**

Pursuant to sections 330 and 331 of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure, (the “Bankruptcy Rules”), Rule 2016-1 of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket No. 235], the law firm of Duane Morris LLP (hereinafter “Duane Morris”) hereby moves the United States Bankruptcy Court for the District of Delaware (the “Court”) for reasonable compensation for professional legal services rendered as special counsel to the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”) in the amount of \$59,461.00, together with reimbursement for actual and necessary expenses incurred in the amount of \$0.00, for the period

¹ The last four digits of SC Healthcare Holding, LLC’s tax identification number are 2584. The mailing address for SC Healthcare Holding, LLC is c/o Petersen Health Care Management, LLC, P.O. Box 620, Delavan, IL 61734. Due to the large number of debtors in these Chapter 11 Cases, whose cases are being jointly administered, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information is available on a website of the Debtors’ claims and noticing agent at www.kccllc.net/Petersen.

commencing April 1, 2025 through and including June 30, 2025 (the “Fee Period”). In support of its Application, Duane Morris respectfully represents as follows:

1. Duane Morris was employed to represent the Debtors as special counsel in connection with these chapter 11 cases, pursuant to an order entered by the Court on June 20, 2024 [Docket No. 544] (the “Duane Morris Retention Order”). The Duane Morris Retention Order authorized Duane Morris to be compensated on an hourly basis and to be reimbursed for actual and necessary expenses.

2. All services for which compensation is requested by Duane Morris were performed for or on behalf of the Debtors.

SUMMARY OF SERVICES RENDERED

3. Attached hereto as **Exhibit A** are detailed statements collectively showing the amount of \$59,461.00 due in fees incurred during the Fee Period.

4. The services rendered by Duane Morris during the Fee Period are grouped into the categories set forth in **Exhibit A**. The attorneys who rendered services relating to each category are identified, along with the number of hours for each individual and the total compensation sought for each category, in **Exhibit A**.

DISBURSEMENTS

5. Duane Morris is requesting reimbursement of actual, reasonable, and necessary expenses incurred during this Fee Period in the amount of \$0.00.

VALUATION OF SERVICES

6. Attorneys of Duane Morris have expended a total of 52.60 hours in connection with this matter during the Fee Period.

7. The amount of time spent by each of these persons providing services to the Debtors for the Fee Period is fully set forth in the detail attached hereto as **Exhibit A**. The hourly rates set

forth therein are Duane Morris' normal hourly rates of compensation for work of this character. The reasonable value of the services rendered by Duane Morris for the Fee Period as co-counsel for the Debtors is \$59,461.00.

8. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, 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 chapter 11 of the Bankruptcy Code. In addition, Duane Morris has reviewed the requirements of Local Rule 2016-1 and believes that this Application complies with the requirements set forth therein.

WHEREFORE, Duane Morris requests that allowance be made to it in the sum of \$59,461.00 as compensation for necessary professional services rendered to the Debtors for the Fee Period, and reimbursement of actual necessary costs and expenses in the amount of \$0.00 incurred during the Fee Period, and further requests such other and further relief as the Court may deem just and proper.

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Dated: July 29, 2025
Philadelphia, PA

Respectfully submitted,

/s/ Drew S. McGehrin

DUANE MORRIS LLP

Drew S. McGehrin (DE 6508)

1201 N Market Street, Suite 501

Wilmington, Delaware 19801 Telephone:
(302) 657-4900

Facsimile: (302) 657-4901

Email: DSMcGehrin@duanemorris.com

*Special Counsel for the Debtors and
Debtors in Possession*

CERTIFICATION OF COMPLIANCE WITH LOCAL RULE 2016-1

I, Drew S. McGehrin, hereby certify as follows:

1. I am an associate at Duane Morris LLP located at 1201 N Market St Suite 501, Wilmington, Delaware 19801. I am a member in good standing of the Bar of the States of Delaware and New Jersey and the Commonwealth of Pennsylvania. In addition, there are no disciplinary proceedings pending against me in any jurisdiction.

2. 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 Rule 2016-1 of the Local Rules of the United States Bankruptcy Court for the District of Delaware and submit that the Application complies with such requirements.

Dated: July 29, 2025

/s/ Drew S. McGehrin

Drew S. McGehrin (DE 6508)

**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: August 12, 2025 at 4:00 p.m. (ET)

NOTICE OF APPLICATION

PLEASE TAKE NOTICE THAT the *Seventh Monthly Fee Application of Duane Morris LLP, as Special Counsel to the Debtors and Debtors in Possession, for Allowance of Compensation and Reimbursement of Expenses for the Period from April 1, 2025 through June 30, 2025* (the “Application”) has been filed with the United States Bankruptcy Court for the District of Delaware (the “Court”). The Application seeks allowance of monthly fees in the amount of \$59,461.00 and monthly expenses in the amount of \$0.00.

PLEASE TAKE FURTHER NOTICE THAT objections to the Application, if any, are required to be filed on or before **August 12, 2025 at 4:00 p.m. (ET)** (the “Objection Deadline”) with the Clerk of the Court, 3rd Floor, 824 Market Street, Wilmington, Delaware 19801. At the same time, you must also serve a copy of the objection so as to be received by the following on or before the Objection Deadline: (a) special counsel to the Debtors, Duane Morris LLP, 30 South 17th Street, Philadelphia, PA 19103, Attn: Dietrich Loos (DALoos@duanemorris.com), Michael Witt (MAWitt@duanemorris.com); (b) the Debtors, P.O. Box 620, Delvan, IL 61734, Attn: David R. Campbell (dcampbell@getzlerhenrich.com); (c) 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) and Shella Borovinskaya (sborovinskaya@ycst.com); (d) 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); (e) counsel to the Official Committee of Unsecured Creditors, Greenberg Traurig, LLP, 77 West Wacker Drive, Suite 3100, Chicago, IL 60601, Attn: Nancy A.

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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 (dennis.meloro@gtlaw.com); and (f) counsel to Column Financial, Inc., Holland & Knight, LLP, 511 Union Street, Ste. 2700, Nashville, Tennessee 37219, Attn: Tyler Lane (tyler.layne@hklaw.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 [D.I. 235], IF NO OBJECTIONS ARE FILED AND SERVED IN ACCORDANCE WITH THE ABOVE PROCEDURES, THEN THE DEBTORS WILL BE AUTHORIZED TO PAY 80% OF REQUESTED MONTHLY FEES AND 100% OF REQUESTED EXPENSES WITHOUT FURTHER ORDER OF THE COURT. ONLY IF AN OBJECTION IS PROPERLY AND TIMELY FILED IN ACCORDANCE WITH THE ABOVE PROCEDURES WILL A HEARING BE HELD ON THE APPLICATION. ONLY THOSE PARTIES TIMELY FILING AND SERVING OBJECTIONS WILL RECEIVE NOTICE AND BE HEARD AT SUCH HEARING.

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Dated: July 29, 2025
Wilmington, Delaware

Respectfully submitted,

**YOUNG CONAWAY STARGATT &
TAYLOR, LLP**

/s/ Shella Borovinskaya

Andrew L. Magaziner (No. 5426)

Shella Borovinskaya (No. 6758)

Rodney Square

1000 North King Street

Wilmington, Delaware 19801

Telephone: (302) 571-6600

Facsimile: (302) 571-1253

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and

WINSTON & STRAWN LLP

Daniel J. McGuire (admitted *pro hac vice*)

Gregory M. Gartland (admitted *pro hac vice*)

35 W. Wacker Drive

Chicago, IL 60601

Telephone: (713) 651-2600

Facsimile: (312) 558-5700

T: (312) 558-5600

Email: dmcguire@winston.com

Email: ggartland@winston.com

and

Carrie V. Hardman (admitted *pro hac vice*)

200 Park Avenue

New York, New York 10166

Telephone: (212) 294-6700

Facsimile: (212) 294-4700

Email: chardman@winston.com

*Counsel for the Debtors and Debtors in
Possession*

EXHIBIT A

May 5, 2025

MARIKAY L. SNYDER
 GENERAL COUNSEL
 830 WEST TRAILCREEK DRIVE
 PEORIA, IL 61614

FILE# G3345

INVOICE# 3302533

IRS# 23-1392502

FOR PROFESSIONAL SERVICES RECORDED THROUGH
 APRIL 30, 2025 IN CONNECTION WITH THE FOLLOWING
 MATTERS:

Matter Number	Matter Name	Fee Amount	Disbursement Amount	Total Amount
00025	POST PETITION SALE MATTERS	\$17,009.50	\$0.00	\$17,009.50
		\$17,009.50	\$0.00	\$17,009.50

TOTAL FEES	\$17,009.50
TOTAL DISBURSEMENTS	\$0.00
TOTAL FEES AND DISBURSEMENTS	\$17,009.50

CURRENT INVOICE	\$17,009.50
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PREVIOUS BALANCE	\$391,272.97
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TOTAL BALANCE DUE	\$408,282.47
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Bill Date	Bill/Ref No.	Bill Amount	Credits	A/R Balance
01/07/25	3253280	\$282,912.13	\$185,873.47	\$97,038.66
01/07/25	3262309	\$166,587.18	\$0.00	\$166,587.18
02/11/25	3272214	\$46,382.13	\$0.00	\$46,382.13
03/10/25	3281863	\$47,670.00	\$0.00	\$47,670.00
04/11/25	3295099	\$33,595.00	\$0.00	\$33,595.00
				\$391,272.97

TOTAL BALANCE DUE	\$408,282.47
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Duane Morris US
May 5, 2025
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File # G3345.00025

INVOICE# 3302533

POST PETITION SALE MATTERS

Date	ID#	Timekeeper	Narrative	Hours	Amount
04/25/25	02190	N. BILIMORIA	TELEPHONE CONFERENCE WITH MR. CAMPBELL RE: CONTACTS AT CMS AND ISSUES RE: CMP AND RECOUPMENTS ONGOING -- DISCUSSION OF POSSIBLE INDIVIDUALS AT CMS THAT MAY HELP (.5); REVIEW FILES AND DRAFT CORRESPONDENCE TO MR. CAMPBELL RE: SAME (.5)	1.00	\$1,080.00
04/28/25	02190	N. BILIMORIA	REVIEW CORRESPONDENCE FROM MR. WITT RE: REQUEST FOR CHANGE OF OWNERSHIP SIGNATURE FOR UTILITIES PROVIDER (.3); REVIEW OF AGREEMENT REQUESTING SIGNATURE (1.4); DRAFT CORRESPONDENCE TO CLIENT RE: ANALYSIS OF AGREEMENT AND DISCUSSION OF SAME (.5)	2.20	\$2,376.00
04/29/25	02190	N. BILIMORIA	REVIEW CORRESPONDENCE FROM DOJ RE: CMS DISCUSSIONS (.3); TELEPHONE CALL TO CLIENT RE: SAME AND DISCUSSION OF STATUS IN DISCUSSIONS WITH CMS AND FOLLOW UP RE: DOJ INVOLVEMENT (.5); DISCUSSION OF NEXT STEPS AND POSSIBLE CALL WITH BANKRUPTCY COUNSEL TO DISCUSS FURTHER (.3)	1.10	\$1,188.00
				4.30	\$4,644.00
04/16/25	02366	D. YELIN	READ EMAIL FROM CHAYA FALK (MADISON TITLE AGENCY) RE REQUEST FOR SIGNED MEMORANDA OF BANKRUPTCY COURT SALE ORDER (FOR RECORDING) (0.1); TELEPHONE CONFERENCE WITH SUSAN BODIE RE STATUS OF BANKRUPTCY COURT SALE ORDER MEMORANDA (0.3); COMPOSED EMAIL TO DAVID CAMPBELL RE STATUS OF BANKRUPTCY COURT SALE ORDER MEMORANDA (0.2); READ AND REPLIED TO EMAIL FROM DAVID CAMPBELL RE NECESSITY FOR RECORDING MEMORANDA OF BANKRUPTCY COURT SALE ORDER IN EVERY COUNTY WHERE PROPERTY TRANSFERS OCCURRED (0.3).	0.90	\$1,134.00
04/25/25	02366	D. YELIN	READ EMAIL FROM MICHAEL WITT RE ANALYSIS OF ABANDONING NINE VACANT FACILITIES OWNED BY DEBTOR (0.2); COMPOSED EMAIL TO MICHAEL WITT RE IMPLICATIONS AND PROCEDURES TO ABANDON PROPERTY IN ILLINOIS (0.1).	0.30	\$378.00

DUANE MORRISLLP

30 SOUTH 17TH STREET PHILADELPHIA, PA 19103-4196

PHONE: 215.979.1000 FAX: 215.979.1020

Duane Morris US
May 5, 2025
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File # G3345.00025

INVOICE# 3302533

POST PETITION SALE MATTERS

Date	ID#	Timekeeper	Narrative	Hours	Amount
				1.20	\$1,512.00
04/28/25	02563	M. WITT	REVIEW DIRECT TV CONTRACTS	2.70	\$3,037.50
				2.70	\$3,037.50
04/11/25	04315	A. OLINER	WORK ON NEW FEE NOTICES	1.00	\$1,400.00
04/15/25	04315	A. OLINER	PREPARE FIFTH AND SIXTH FEE NOTICES	1.00	\$1,400.00
04/30/25	04315	A. OLINER	VARIOUS CORR WITH UST AND REVIEW DOCKET	0.50	\$700.00
				2.50	\$3,500.00
04/07/25	05911	D. MCGEHRIN	REVIEWING, REVISING AND FINALIZING FIFTH AND SIXTH APPLICATIONS FOR COMPENSATION	0.50	\$387.50
04/14/25	05911	D. MCGEHRIN	FINALIZING FIFTH FEE APPLICATION AND COORDINATING FILING OF SAME	0.40	\$310.00
04/15/25	05911	D. MCGEHRIN	FURTHER REVISING AND FINALIZING FIFTH MONTHLY FEE APPLICATION FOLLOWING RECEIPT OF COMMENTS TO SAME FROM LEAD DEBTORS' COUNSEL	0.50	\$387.50
04/16/25	05911	D. MCGEHRIN	FURTHER REVISING FIFTH FEE APPLICATION FOLLOWING RECEIPT OF COMMENTS TO SAME FROM DEBTORS' LEAD COUNSEL	0.60	\$465.00
				2.00	\$1,550.00
04/28/25	10240	C. FADER	RESEARCH AND DRAFT EMAIL REGARDING WHETHER REAL ESTATE CAN BE ABANDONED; IMPACT OF BANKRUPTCY ON TAX SALE (0.8); ANONYMOUS CALL TO A COUNTY TREASURER AND CLERK RE: TAX SALES (0.4).	1.20	\$1,290.00
				1.20	\$1,290.00
04/06/25	11167	N. YEARY	PREPARE MONTHLY FEE APPLICATIONS COVERING SERVICES RENDERED IN JANUARY AND FEBRUARY.	1.50	\$922.50
04/07/25	11167	N. YEARY	START REVIEW OF INVOICES FOR PRIVELEGED AND CONFIDENTIAL INFORMATION, CORRESPOND WITH MCGEHRIN RE SAME.	0.30	\$184.50
04/14/25	11167	N. YEARY	PREPARE JOINT MONTHLY FEE APPLICATION (0.5); EMAILS WITH MCGEHRIN RE SAME (0.1).	0.60	\$369.00
				2.40	\$1,476.00
Total Services:				16.30	\$17,009.50

File # G3345.00025
POST PETITION SALE MATTERS

INVOICE# 3302533

Timekeeper

No.	Name	Hours	Amount
02190	N. BILIMORIA	4.30	\$4,644.00
02366	D. YELIN	1.20	\$1,512.00
02563	M. WITT	2.70	\$3,037.50
04315	A. OLINER	2.50	\$3,500.00
05911	D. MCGEHRIN	2.00	\$1,550.00
10240	C. FADER	1.20	\$1,290.00
11167	N. YEARY	2.40	\$1,476.00
		<hr/> 16.30	<hr/> \$17,009.50

TOTAL FEES	\$17,009.50
TOTAL DISBURSEMENTS	<hr/> \$0.00
TOTAL FEES AND DISBURSEMENTS	<hr/> \$17,009.50

CURRENT INVOICE	\$17,009.50
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June 13, 2025

MARIKAY L. SNYDER
 GENERAL COUNSEL
 830 WEST TRAILCREEK DRIVE
 PEORIA, IL 61614

FILE# G3345

INVOICE# 3319036

IRS# 23-1392502

FOR PROFESSIONAL SERVICES RECORDED THROUGH MAY
 31, 2025 IN CONNECTION WITH THE FOLLOWING MATTERS:

Matter Number	Matter Name	Fee Amount	Disbursement Amount	Total Amount
00025	POST PETITION SALE MATTERS	\$26,109.50	\$0.00	\$26,109.50
		<u>\$26,109.50</u>	<u>\$0.00</u>	<u>\$26,109.50</u>

TOTAL FEES	\$26,109.50
TOTAL DISBURSEMENTS	\$0.00
TOTAL FEES AND DISBURSEMENTS	<u>\$26,109.50</u>

CURRENT INVOICE	\$26,109.50
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PREVIOUS BALANCE	\$306,153.47
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TOTAL BALANCE DUE	\$332,262.97
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Bill Date	Bill/Ref No.	Bill Amount	Credits	A/R Balance
01/07/25	3262309	\$166,587.18	\$5,090.34	\$161,496.84
02/11/25	3272214	\$46,382.13	\$0.00	\$46,382.13
03/10/25	3281863	\$47,670.00	\$0.00	\$47,670.00
04/11/25	3295099	\$33,595.00	\$0.00	\$33,595.00
05/05/25	3302533	\$17,009.50	\$0.00	\$17,009.50
				<u>\$306,153.47</u>

TOTAL BALANCE DUE	\$332,262.97
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Duane Morris US
June 13, 2025
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File # G3345.00025

INVOICE# 3319036

POST PETITION SALE MATTERS

Date	ID#	Timekeeper	Narrative	Hours	Amount
05/01/25	02190	N. BILIMORIA	REVIEW CORRESPONDENCE AND DRAFT CORRESPONDENCE TO CLIENT RE: CMS ISSUES (.5); TELEPHONE CONFERENCE WITH CLIENT AND DISCUSSION OF STRATEGY RE: CMS LIABILITIES AND FOLLOW UP RE: SAME (.5)	1.00	\$1,080.00
05/02/25	02190	N. BILIMORIA	REVIEW CORRESPONDENCE FROM CMS AND DOJ RE: INFORMATION NEEDED TO ASSESS CMS LIABILITIES (.3); REVIEW CORRESPONDENCE TO AND FROM BANKRUPTCY COUNSEL AND CMS RE: SAME (.3); REVIEW CORRESPONDENCE FROM CMS RE: ISSUES RE: CONTACTING CMS AND TELEPHONE CONFERENCE WITH CLIENT RE: SAME (.5); REVIEW CORRESPONDENCE FROM CLIENT RE: POSSIBLE MEETING WITH CMS AND DOJ TO DISCUSS ISSUES RE: RECONCILIATION OF CMS LIABILITIES AND RESPONSES IN SETTING UP MEETING TO DISCUSS SAME (.5)	1.60	\$1,728.00
05/05/25	02190	N. BILIMORIA	TELEPHONE CONFERENCE WITH CLIENT RE: PREPARATION FOR MEETING WITH CMS AND DISCUSSION OF STRATEGY RE: SAME	0.50	\$540.00
05/09/25	02190	N. BILIMORIA	REVIEW MULTIPLE CORRESPONDENCE FROM CMS COUNSEL AND FROM CLIENT RE: POSSIBLE STRATEGY RE: CMS ESCROW AND PAYMENT OF SAME (.6); TELEPHONE CALL FROM CLIENT AND DISCUSSION OF ISSUES RE: CMS NEGOTIATIONS AND LIABILITIES FOR NEW OPERATORS RE: SAME (.5)	1.10	\$1,188.00
05/19/25	02190	N. BILIMORIA	REVIEW MULTIPLE CORRESPONDENCE TO AND FROM CMS, CLIENT, AND HHS DOJ RE: CMS PENALTIES AND ENFORCEMENT ISSUES (.5); REVIEW OF LIST OF FACILITIES AND ENFORCEMENT AMOUNTS AT ISSUE FOR CMS PENALTIES (.4)	0.90	\$972.00
05/21/25	02190	N. BILIMORIA	REVIEW OF PLAN FOR CMS PENALTIES AND ENFORCEMENT FROM CLIENT (.3); DRAFT RESPONSE TO CLIENT RE: REGULATORY ISSUES RE: WAIVER OF RIGHT TO HEARING AND CMS REDUCTIONS IN THE NORMAL COURSE TO CMPS AND SCOPE AND SEVERITY LEVELS (.9); FOLLOW UP WITH MS. MCCracken RE: STATUS OF SURVEYS (.3); REVIEW CORRESPONDENCE FROM	2.70	\$2,916.00

Duane Morris US
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File # G3345.00025

INVOICE# 3319036

POST PETITION SALE MATTERS

Date	ID#	Timekeeper	Narrative	Hours	Amount
05/27/25	02190	N. BILIMORIA	MS MCCRACKEN AND DRAFT CORRESPONDENCE TO CLIENT RE: OUTSTANDING CMPS AND OUR ANALYSIS RE: SAME, AND DRAFT RESPONSES VIA CORESPONDENCE TO CLIENT ADDITIONAL QUESTIONS (1.2) TELEPHONE CONFERENCE WITH MR. WITT RE: STATUS OF DISCUSSIONS WITH CMS AND HHS DOJ AND CLIENT RE: CMS LIABILITIES AND DISCUSSION OF ESCROW DOCUMENTS NEEDED TO EFFECTUATE RELEASE OF ESCROW (.6)	0.60	\$648.00
				8.40	\$9,072.00
05/01/25	02563	M. WITT	REVIEW ABANDONED PROPERTY ITEMS	2.80	\$3,150.00
05/22/25	02563	M. WITT	DRAFT ESCROW RELEASE OF CMS FUNDS.	1.10	\$1,237.50
05/23/25	02563	M. WITT	DRAFT ESCROW RELEASE LETTER RE CMP	2.00	\$2,250.00
05/27/25	02563	M. WITT	ALL HANDS CALL RE RELEASE OF CMP AMOUNTS	1.00	\$1,125.00
				6.90	\$7,762.50
05/01/25	04315	A. OLINER	CORR TO AND FROM UST	0.50	\$700.00
05/05/25	04315	A. OLINER	WORK ON FEE APPLICATIONS	1.50	\$2,100.00
05/06/25	04315	A. OLINER	DRAFT FIFTH FEE NOTICE	0.50	\$700.00
05/07/25	04315	A. OLINER	WORK ON FEE MATTERS	0.50	\$700.00
05/13/25	04315	A. OLINER	4TH FEE APP PREP	1.00	\$1,400.00
05/19/25	04315	A. OLINER	VARIOUS TASKS RE FOURTH AND FIFTH FEE REQUESTS	0.70	\$980.00
				4.70	\$6,580.00
05/21/25	03194	A. MCCRACKEN	IDENTIFY ANALYSIS REGARDING CMPS AND WAIVERS FOR CERTAIN FACILITIES AND FORWARD TO MR. BIIMORIA	0.10	\$95.00
				0.10	\$95.00
05/08/25	05911	D. MCGEHRIN	DRAFTING AND REVISING MONTHLY FEE APPLICATION FOR MARCH	1.20	\$930.00
05/08/25	05911	D. MCGEHRIN	DRAFTING AND REVISING SUPPLEMENT TO FOURTH INTERIM FEE APPLICATION	1.40	\$1,085.00
05/15/25	05911	D. MCGEHRIN	REVIEWING AND FINALIZING SUPPLEMENT TO FOURTH INTERIM FEE STATEMENT	0.20	\$155.00
				2.80	\$2,170.00
05/01/25	10240	C. FADER	PARTICIPATE IN A CALL WITH C.HARDMAN AND D.NEWTON RE: ABANDONED PROPERTIES AND FACTS THAT WE NEED TO GATHER, INCLUDING LOCATION, IF PROPERTIES HAVE BEEN HELD FOR SALE, DELINQUENT TAXES,	0.20	\$215.00

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POST PETITION SALE MATTERS

Date	ID#	Timekeeper	Narrative	Hours	Amount
05/06/25	10240	C. FADER	LENGTH OF TIME TAXES HAVE BEEN UNPAID DRAFT EMAIL TO D.CAMPBELL THAT SUMMARIZES OUR REQUESTS FOR RELEVANT FACTS REGARDING THE 9 ABANDONED PROPERTIES, INCLUDING LOCATIONS, YEARS OF UNPAID TAXES, STATUS OF ENGAGING AN AGENT OR BROKER TO SELL EACH PROPERTY, WITH THE GOAL OF IDENTIFYING WAYS TO UNLOAD THESE PROPERTIES, AS PERMITTED BY ILLINOIS STATUTES	0.20	\$215.00
				0.40	\$430.00
Total Services:				23.30	\$26,109.50

Timekeeper

No.	Name	Hours	Amount
02190	N. BILIMORIA	8.40	\$9,072.00
02563	M. WITT	6.90	\$7,762.50
03194	A. MCCracken	0.10	\$95.00
04315	A. OLINER	4.70	\$6,580.00
05911	D. MCGEHRIN	2.80	\$2,170.00
10240	C. FADER	0.40	\$430.00
		23.30	\$26,109.50

TOTAL FEES	\$26,109.50
TOTAL DISBURSEMENTS	\$0.00
TOTAL FEES AND DISBURSEMENTS	\$26,109.50
CURRENT INVOICE	\$26,109.50

July 11, 2025

MARIKAY L. SNYDER
 GENERAL COUNSEL
 830 WEST TRAILCREEK DRIVE
 PEORIA, IL 61614

FILE# G3345

INVOICE# 3328726

IRS# 23-1392502

FOR PROFESSIONAL SERVICES RECORDED THROUGH JUNE
 30, 2025 IN CONNECTION WITH THE FOLLOWING MATTERS:

Matter Number	Matter Name	Fee Amount	Disbursement Amount	Total Amount
00025	POST PETITION SALE MATTERS	\$16,342.00	\$0.00	\$16,342.00
		<u>\$16,342.00</u>	<u>\$0.00</u>	<u>\$16,342.00</u>

TOTAL FEES	\$16,342.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL FEES AND DISBURSEMENTS	<u>\$16,342.00</u>

CURRENT INVOICE	\$16,342.00
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PREVIOUS BALANCE	\$68,637.13
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TOTAL BALANCE DUE	\$84,979.13
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Bill Date	Bill/Ref No.	Bill Amount	Credits	A/R Balance
02/11/25	3272214	\$46,382.13	\$37,117.00	\$9,265.13
03/10/25	3281863	\$47,670.00	\$38,136.00	\$9,534.00
04/11/25	3295099	\$33,595.00	\$26,876.00	\$6,719.00
05/05/25	3302533	\$17,009.50	\$0.00	\$17,009.50
06/13/25	3319036	\$26,109.50	\$0.00	<u>\$26,109.50</u>
				\$68,637.13

TOTAL BALANCE DUE	\$84,979.13
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Duane Morris US
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File # G3345.00025

INVOICE# 3328726

POST PETITION SALE MATTERS

Date	ID#	Timekeeper	Narrative	Hours	Amount
06/03/25	02563	M. WITT	WORK ON ESCROW RELEASE MATTER	3.80	\$4,275.00
06/09/25	02563	M. WITT	DISCUSS MONEY ESCROW ISSUES WITH DAVID CAMPBELL	0.30	\$337.50
				4.10	\$4,612.50
06/02/25	04315	A. OLINER	REVIEW DOCKET (0.50); STATUS OF MOTION TO CONVERT, ADMIN CLAIMS AND PLAN (1.0).	1.50	\$2,100.00
06/03/25	04315	A. OLINER	REVIEW DOCKET AND STATUS OF PLAN AND CONVERSION MOTION	1.00	\$1,400.00
06/09/25	04315	A. OLINER	WORK ON FEE REQUESTS	0.50	\$700.00
06/11/25	04315	A. OLINER	CORR WITH COUNSEL RE COMMENTS TO FEE REQUESTS AND UST POSITION	0.50	\$700.00
06/17/25	04315	A. OLINER	CORR FROM COUNSEL TO DEBTOR AND REVIEW DOCKET RE FINAL FEES	0.50	\$700.00
06/20/25	04315	A. OLINER	VARIOUS EMAILS AND DOC REVIEW RE FINAL PAYMENTS	0.80	\$1,120.00
06/24/25	04315	A. OLINER	COURT REVIEW AND PREP	0.50	\$700.00
06/25/25	04315	A. OLINER	REVIEW FEE APP AND PREPARE FOR COURT	2.00	\$2,800.00
				7.30	\$10,220.00
06/05/25	03364	D. LOOS	REVISING AND ASSEMBLING CMP ESCROW RELEASE LETTER FOR SIGNATURE.	0.30	\$306.00
06/09/25	03364	D. LOOS	CORRESPONDENCE WITH CASCADE COUNSEL RE: STATUS OF CMP ESCROW RELEASE.	0.40	\$408.00
06/10/25	03364	D. LOOS	CORRESPONDENCE WITH TITLE COMPANY AND CASCADE COUNSEL RE: CMP ESCROW RELEASE LETTER AND RELEASE OF ESCROW FUNDS	0.40	\$408.00
				1.10	\$1,122.00
06/25/25	05911	D. MCGEHRIN	ANALYZING INQUIRIES RECEIVED FROM CHAMBERS REGARDING FEE APPLICATIONS.	0.50	\$387.50
				0.50	\$387.50
Total Services:				13.00	\$16,342.00

Timekeeper

No.	Name	Hours	Amount
02563	M. WITT	4.10	\$4,612.50
03364	D. LOOS	1.10	\$1,122.00
04315	A. OLINER	7.30	\$10,220.00
05911	D. MCGEHRIN	0.50	\$387.50
		13.00	\$16,342.00

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POST PETITION SALE MATTERS

INVOICE# 3328726

TOTAL FEES	\$16,342.00
TOTAL DISBURSEMENTS	\$0.00
TOTAL FEES AND DISBURSEMENTS	<hr/> \$16,342.00

CURRENT INVOICE	\$16,342.00
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