

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

In re:

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

Debtors.

Chapter 11

Case No. 24-10443 (TMH)

(Jointly Administered)

Obj. Deadline: August 29, 2025 at 4:00 p.m.

**FIFTEENTH 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 JUNE 1, 2025 THROUGH JUNE 30, 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:

June 1, 2025 through June 30, 2025

Amount of Compensation sought as  
actual, reasonable and necessary  
legal services rendered:

\$21,665.00

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

\$251.00

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

<sup>1</sup>The last four digits of SC Healthcare Holding, LLC's tax identification number are 2584. The mailing address for SC Healthcare Holding, LLC is c/o Petersen Health Care Management, LLC 830 West Trailcreek Dr., Peoria, IL 61614. Due to the large number of Debtors in these Chapter 11 Cases, whose cases are being jointly administered, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information is available on a website of the Debtors' claims and noticing agent at [www.kccllc.net/Petersen](http://www.kccllc.net/Petersen).



## 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
7/29/2025	May 1, 2025 through May 31, 2025	\$18,936.00	\$339.73	\$15,148.80	\$339.73

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FOR THE DISTRICT OF DELAWARE**

In re:

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Debtors.

Chapter 11

Case No. 24-10443 (TMH)

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Obj. Deadline: August 29, 2025 at 4:00 p.m.

**FIFTEENTH 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 JUNE 1, 2025 THROUGH JUNE 30, 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 fifteenth 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 \$21,665.00 and reimbursement of expenses

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<sup>1</sup>The last four digits of SC Healthcare Holding, LLC’s tax identification number are 2584. The mailing address for SC Healthcare Holding, LLC is c/o Petersen Health Care Management, LLC 830 West Trailcreek Dr., Peoria, IL 61614. Due to the large number of Debtors in these Chapter 11 Cases, whose cases are being jointly administered, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information is available on a website of the Debtors’ claims and noticing agent at [www.kccllc.net/Petersen](http://www.kccllc.net/Petersen).

in the amount \$251.00 for the period from June 1, 2025 through June 30, 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 (10<sup>th</sup>) 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 \$17,332.00 which is equal to 80% of the \$21,665.00 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 \$251.00.

#### **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 \$251.00 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 36.00 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 \$21,665.00.

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 \$21,665.00 for the period from June 1, 2025 through June 30, 2025; (ii) payment in the total amount of \$17,583.00 (representing 80% of the total fees (\$17,332.00) billed and 100% of the expenses (\$251.00) incurred during the Compensation Period); and (iii) such other relief as this Court deems just and proper.

Date: August 15, 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](mailto: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  
Facsimile: (973) 538-5146  
Email: [rmschechter@pbnlaw.com](mailto:rmschechter@pbnlaw.com)  
Email: [cpmazza@pbnlaw.com](mailto:cpmazza@pbnlaw.com)

*Counsel for the Patient Care Ombudsman*



# EXHIBIT A

**Timekeeper Summary – June 1, 2025 – June 30, 2025**

<b>Timekeeper</b>	<b>Position</b>	<b>Rate</b>	<b>Hours</b>	<b>Amount</b>
Robert M. Schechter	Principal in Bankruptcy Department since 2014, Member of NJ Bar since 2005	\$925.00	13.80 <sup>1</sup>	\$9,620.00
Cheryl A. Santaniello	Principal in Bankruptcy Department since 2014, Member of DE Bar since 2007	\$875.00	0.60	\$525.00
Kimberly N. Pageau	Counsel in Bankruptcy Department since 2025, Member of NY Bar 2017	\$750.00	1.50	\$1,125.00
Michael F. Medved	Associate in Bankruptcy Department since 2024, Member of CA Bar 2021	\$620.00	7.50	\$4,650.00
Michael J. Leon	Associate in Real Estate Department since 2024, Member of NJ Bar 2024	\$490.00	6.00	\$2,940.00
Jessica M. O'Connor	Paralegal in Bankruptcy Department since 2020	\$425.00	6.60	\$2,805.00
<b>Totals:</b>			<b>36.00</b>	<b>\$21,665.00</b>
<b>Blended Rate:</b>			<b>\$602</b>	

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<sup>1</sup> 6.80 hours billed at a rate of \$462.50.

**Compensation By Category – June 1, 2025 – June 30, 2025**

<b>Project Category</b>		
Business Operations	0.40	\$248.00
Case Administration	6.40	\$3,340.00
Fee/Employment Applications	9.10	\$4,491.50
Financing	0.60	\$525.00
Non-working Travel <sup>2</sup>	6.80	\$3,145.00
Plan and Disclosure Statement	12.70	\$9,915.50
<b>Totals</b>	<b>36.00</b>	<b>\$21,665.00</b>

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<sup>2</sup> Non-working travel billed at a rate of 50%.



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

July 16, 2025

Suzanne Koenig  
300 Saunders Road  
Riverwoods, IL 60015

Invoice # 3337284

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

**STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 06/30/25**

Professional Services	21,665.00
Disbursements	251.00
<b>TOTAL CURRENT INVOICE</b>	<b>\$21,916.00</b>
Previous Balance Due	63,023.32
<b>TOTAL BALANCE DUE</b>	<b>\$84,939.32</b>

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

July 16, 2025

Suzanne Koenig  
300 Saunders Road  
Riverwoods, IL 60015

Invoice # 3337284

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	0.40	248.00
CASEADMN	Case Administration	6.40	3,340.00
FEEAPPS	Fee/Employment Applications	9.10	4,491.50
FINANCE	Financing	0.60	525.00
NONWKGTV	Non-Working Travel	6.80	3,145.00
PLANDSCL	Plan and Disclosure Statement	12.70	9,915.50
<b>Total</b>		<b><u>36.00</u></b>	<b><u>21,665.00</u></b>

#### 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>
<b>Business Operations</b>					
BUSOPS	Medved, M. F.	Associate 1	0.40	620.00	248.00
<b>Business Operations</b>					
<b>Total</b>			<b>0.40</b>		<b>248.00</b>
<b>Case Administration</b>					
CASEADMN	Schechter, R. M.	Principal	0.20	925.00	185.00
	Leon, M. J.	Associate 3	5.30	490.00	2,597.00
	Medved, M. F.	Associate 1	0.90	620.00	558.00
<b>Case Administration</b>					
<b>Total</b>			<b>6.40</b>		<b>3,340.00</b>

#### Fee/Employment Applications

Our Matter # 026646.099904  
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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>
FEEAPPS	OConnor, J. M.	Paralegal - 2 -	5.90	425.00	2,507.50
	Medved, M. F.	Senior Level Associate 1	3.20	620.00	1,984.00
<b>Fee/Employment Applications</b>					
<b>Total</b>			<b>9.10</b>		<b>4,491.50</b>
<b>Financing</b>					
FINANCE	Santaniello, C. A.	Principal	0.60	875.00	525.00
<b>Financing</b>					
<b>Total</b>			<b>0.60</b>		<b>525.00</b>
<b>Non-Working Travel</b>					
NONWKGTV	Schechter, R. M.	Principal	6.80	462.50	3,145.00
<b>Non-Working Travel</b>					
<b>Total</b>			<b>6.80</b>		<b>3,145.00</b>
<b>Plan and Disclosure Statement</b>					
PLANDSCL	Schechter, R. M.	Principal	6.80	925.00	6,290.00
	OConnor, J. M.	Paralegal - 2 -	0.70	425.00	297.50
		Senior Level			
	Leon, M. J.	Associate 3	0.70	490.00	343.00
	Medved, M. F.	Associate 1	3.00	620.00	1,860.00
	Pageau, K. N.	Counsel	1.50	750.00	1,125.00
<b>Plan and Disclosure Statement</b>					
<b>Total</b>			<b>12.70</b>		<b>9,915.50</b>
<b>Total</b>			<b>36.00</b>		<b>21,665.00</b>

#### AGGREGATE TIME SUMMARY PAGE BY INDIVIDUAL

0694	Schechter, R. M.	Principal	6.80	462.50	3,145.00
0694	Schechter, R. M.	Principal	7.00	925.00	6,475.00
2624	OConnor, J. M.	Paralegal - 2 -	6.60	425.00	2,805.00
		Senior Level			
2625	Santaniello, C. A.	Principal	0.60	875.00	525.00
2724	Leon, M. J.	Associate 3	6.00	490.00	2,940.00
2827	Medved, M. F.	Associate 1	7.50	620.00	4,650.00
2851	Pageau, K. N.	Counsel	1.50	750.00	1,125.00
<b>Total</b>			<b>36.00</b>		<b>21,665.00</b>

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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>
06/11/25	Correspondence with counsel for debtors on reconciliation.	MFM	BUSOPS	0.40	248.00
<b>BUSOPS Total</b>				<b>0.40</b>	<b>248.00</b>
06/02/25	Review of conversion motion and plan and discussions and communications on same.	MFM	CASEADMN	0.90	558.00
06/03/25	Research relating to Patient Care Ombudsman ("PCO"), as a court-appointed fiduciary under 11 U.S.C. § 333, and potential priority on PCO's costs due to distinct public interest role in protecting patient care during Chapter 11 proceedings and necessary costs incurred notwithstanding Debtors' uncertain financial status and continued use of Debtors' licenses.	MJL	CASEADMN	5.30	2,597.00
06/23/25	Communications regarding CNO and docketing same.	RMS	CASEADMN	0.10	92.50
06/25/25	Communications regarding upcoming hearing.	RMS	CASEADMN	0.10	92.50
<b>CASEADMN Total</b>				<b>6.40</b>	<b>3,340.00</b>
06/02/25	Finalize Notice of Hearing on Fourth Interim Fee Applications	JMO	FEEAPPS	0.10	42.50
06/02/25	Prepare and file Notice of Hearing of Fourth Interim Fee Applications	JMO	FEEAPPS	0.20	85.00
06/02/25	Service email regarding filed Notice of Hearing on Fourth Interim Fee Applications	JMO	FEEAPPS	0.10	42.50
06/02/25	Emails from and to M. Medved regarding Notice of Hearing on Fourth Interim Fee Apps	JMO	FEEAPPS	0.20	85.00
06/02/25	Reviewed notice of hearing for fee application.	MFM	FEEAPPS	0.40	248.00
06/02/25	Coordinated research required for potential response to fee objection.	MFM	FEEAPPS	0.80	496.00
06/03/25	Emails to and from M. Medved regarding response to monthly fee statement objections	JMO	FEEAPPS	0.30	127.50
06/06/25	Begin drafting May Monthly Fee	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>
06/17/25	Statement of PBN Finish drafting May Monthly Fee	JMO	FEEAPPS	0.40	170.00
06/17/25	Statement of PBN Email to M. Medved regarding draft	JMO	FEEAPPS	0.10	42.50
06/17/25	May Monthly Fee Statement of PBN Begin drafting May Monthly Fee	JMO	FEEAPPS	0.30	127.50
06/19/25	Statement of SAK Emails to and from R. Schechter	JMO	FEEAPPS	0.20	85.00
06/23/25	regarding May Monthly Fee Statements Emails from and to M. Medved	JMO	FEEAPPS	0.30	127.50
06/23/25	regarding hearing on Fourth Interim Fee Applications Emails from and to M. Medved	JMO	FEEAPPS	0.30	127.50
06/23/25	regarding CNOs to March & April monthlies and Fourth Interims Emails from and to C. Santaniello	JMO	FEEAPPS	0.20	85.00
06/23/25	regarding drafting COC to Fourth Interim Fee Apps Draft CNO to March Monthly of PBN	JMO	FEEAPPS	0.20	85.00
06/23/25	Draft CNO to March Monthly of SAK	JMO	FEEAPPS	0.20	85.00
06/23/25	Draft CNO to April Monthly of PBN	JMO	FEEAPPS	0.10	42.50
06/23/25	Draft CNO to April Monthly of SAK	JMO	FEEAPPS	0.10	42.50
06/23/25	Email to internal team regarding draft CNOs to March & April Monthlies	JMO	FEEAPPS	0.10	42.50
06/23/25	Emails from R. Schechter and C. Santaniello regarding edits to CNO to March & April Monthlies of PBN & SAK	JMO	FEEAPPS	0.20	85.00
06/23/25	Draft COC, Proposed Order and Interim Fee Chart to Fourth Interim Fee Applications; email same to internal team	JMO	FEEAPPS	0.50	212.50
06/23/25	Email from C. Santaniello regarding filing CNOs to March & April Monthly Fee Statements	JMO	FEEAPPS	0.10	42.50
06/23/25	File CNO to March Monthly of PBN	JMO	FEEAPPS	0.10	42.50
06/23/25	File CNO to March Monthly of SAK	JMO	FEEAPPS	0.10	42.50
06/23/25	File CNO to April Monthly of PBN	JMO	FEEAPPS	0.10	42.50
06/23/25	File CNO to April Monthly of SAK	JMO	FEEAPPS	0.10	42.50
06/23/25	Emails to and from internal team regarding filing COC to Fourth Interim Fee Applications	JMO	FEEAPPS	0.30	127.50
06/23/25	File COC to Fourth Interim Fee Applications	JMO	FEEAPPS	0.10	42.50
06/23/25	Email to internal team regarding filed	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>
	CNOs and COC				
06/23/25	Coordinated certificates of no objection filing.	MFM	FEEAPPS	0.80	496.00
06/23/25	Communications with client on fee applications.	MFM	FEEAPPS	0.40	248.00
06/25/25	Coordinate hearing attendance for Interim Fee Application hearing	JMO	FEEAPPS	0.20	85.00
06/26/25	Review Cancellation of Interim Fee App Hearing	JMO	FEEAPPS	0.10	42.50
06/27/25	Updated may fee application to reflect recent interim order.	MFM	FEEAPPS	0.80	496.00
<b>FEEAPPS Total</b>				<b>9.10</b>	<b>4,491.50</b>
06/03/25	Review agenda for contested hearings on 6/4 (.2); review Wells Fargo omnibus objection to fees (.2); email exchange with R. Schecter regarding hearing attendance and strategy (.2)	CAS	FINANCE	0.60	525.00
<b>FINANCE Total</b>				<b>0.60</b>	<b>525.00</b>
06/04/25	Travel to from hearing.	RMS	NONWKGTV	3.60	1,665.00
06/10/25	Travel to from confirmation hearing.	RMS	NONWKGTV	3.20	1,480.00
<b>NONWKGTV Total</b>				<b>6.80</b>	<b>3,145.00</b>
06/02/25	Review Notice of Agenda for Confirmation Hearing	JMO	PLANDSCL	0.10	42.50
06/02/25	Email to internal team regarding Notice of Agenda for Confirmation Hearing	JMO	PLANDSCL	0.10	42.50
06/02/25	Coordinate hearing attendance for confirmation hearing	JMO	PLANDSCL	0.20	85.00
06/02/25	Research re PCO fee issues	KNP	PLANDSCL	1.50	1,125.00
06/02/25	Research regarding Appointment of patient Care ombudsman under the Bankruptcy Code and confirmation order terms.	MJL	PLANDSCL	0.70	343.00
06/02/25	Communicate with PCO regarding confirmation.	RMS	PLANDSCL	0.10	92.50
06/02/25	Review order shortening time for notice on conversion motion and notice of agenda.	RMS	PLANDSCL	0.10	92.50
06/03/25	Communicate with PCO regarding hearing tomorrow.	RMS	PLANDSCL	0.20	185.00
06/04/25	Attend hearing, pre-and post-hearing discussions.	RMS	PLANDSCL	0.50	462.50
06/04/25	Communications regarding carried	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>
06/06/25	hearing. Review Notice of Agenda for Continued Confirmation Hearing	JMO	PLANDSCL	0.10	42.50
06/06/25	Email to internal team regarding Notice of Agenda for Continued Confirmation Hearing	JMO	PLANDSCL	0.10	42.50
06/06/25	Update hearing calendar regarding continued Confirmation Hearing	JMO	PLANDSCL	0.10	42.50
06/07/25	Review of updated plan and disclosure statement for treatment of professional fees and other updates.	MFM	PLANDSCL	1.60	992.00
06/08/25	Review filing of proposed findings of facts and conclusions of law together with filed disclosure statement and plan (1.8); communications regarding professionals relating to PCO (.3.)	RMS	PLANDSCL	2.10	1,942.50
06/08/25	Review memorandum of law in supportive confirmation (.4) and communications regarding same (.1).	RMS	PLANDSCL	0.50	462.50
06/09/25	Review of amounts stated as paid in schedule to plan and reconciling amounts.	MFM	PLANDSCL	1.40	868.00
06/09/25	Communications regarding plan, confirmation order and schedule.	RMS	PLANDSCL	0.40	370.00
06/09/25	Review documents in preparation for hearing tomorrow.	RMS	PLANDSCL	0.50	462.50
06/09/25	Review amended agenda in connection with confirmation hearing.	RMS	PLANDSCL	0.10	92.50
06/10/25	Pre-confirmation hearing discussion and attend confirmation hearing.	RMS	PLANDSCL	1.70	1,572.50
06/10/25	Communications regarding schedule 1 and footnote, review same.	RMS	PLANDSCL	0.20	185.00
06/11/25	Summary review of entered confirmation order.	RMS	PLANDSCL	0.30	277.50
<b>PLANDSCL Total</b>				<b>12.70</b>	<b>9,915.50</b>
<b>Fees Total</b>				<b>36.00</b>	<b>21,665.00</b>

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<b>Disbursement Summary</b>	<b>Total</b>
Westlaw	251.00
<b>Total Disbursements</b>	<b>251.00</b>

#### Disbursement Detail

<b>Date</b>	<b>Description</b>	<b>Amount</b>
06/30/25	Westlaw electronic research expense, June 2025 (1 research session(s) at \$251 / day). PAGEAU,KIMBERLY	251.00
<b>TOTAL DISBURSEMENTS</b>		<b>\$251.00</b>

#### TOTALS FOR THIS MATTER

Professional Services	21,665.00
Disbursements	251.00
Total Professional Services & Disbursements	21,916.00

<b>BALANCE DUE THIS INVOICE</b>	<b>\$ 21,916.00</b>
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Previous Balance Due	63,023.32
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<b>TOTAL AMOUNT DUE INCLUDING THIS INVOICE</b>	<b>\$ 84,939.32</b>
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#### ACCOUNTS RECEIVABLE

<b>INVOICE DATE</b>	<b>INVOICE NUMBER</b>	<b>INVOICE TOTAL</b>	<b>OUTSTANDING BALANCE</b>
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
05/14/25	3334128	31,120.74	31,120.74
<b>CURRENT BALANCE DUE</b>		<b>\$175,833.34</b>	<b>\$63,023.32</b>

# EXHIBIT B

**Summary of Expenses – June 1, 2025 – June 30, 2025**

<b>DISBURSEMENTS</b>	<b>AMOUNT</b>
a) <b>Filing/Court Fees</b> Payable to Clerk of Court. (Admission Fees)	\$0.00
b) <b>Computer Assisted Legal Research</b> Westlaw, Lexis and a description of manner calculated.	\$251.00
c) <b>Pacer Fees</b> Payable to the Pacer Service Center for search and/or print.	\$0.00
d) <b>Fax (with rates)</b> No. of Pages ____ Rate per Page ____ (Max. \$1.00/pg.)	\$0.00
e) <b>Case Specific Telephone / Conference Call Charges</b> Exclusive of overhead charges.	\$0.00
f) <b>In-House Reproduction Services</b> Exclusive of overhead charges.	\$0.00
g) <b>Outside Reproduction Services</b> Including scanning services.	\$0.00
h) <b>Other Research</b> Title searches, UCC searches, Asset searches, Accurint.	\$0.00
i) <b>Court Reporting / Deposition Services</b> Transcripts.	\$0.00
j) <b>Travel</b> Mileage, rolls, airfare and parking.	\$0.00
k) <b>Courier &amp; Express Carriers</b> Overnight and personal delivery	\$0.00
l) <b>Postage</b>	\$0.00
m) <b>Other (specify)</b>	\$0.00
<b>DISBURSEMENTS TOTAL:</b>	<b>\$251.00</b>

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

In re:

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

Debtors.

Chapter 11

Case No. 24-10443 (TMH)

(Jointly Administered)

Obj. Deadline: August 29, 2025 at 4:00 p.m.

**NOTICE OF FIFTEENTH 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 JUNE 1, 2025 THROUGH JUNE 30, 2025**

**PLEASE TAKE NOTICE** that, on August 15, 2025, Porzio, Bromberg & Newman, P.C. (“Porzio”), counsel for Suzanne Koenig, the patient care ombudsman (the “Ombudsman”), filed its Fifteenth Monthly Fee Application (the “Application”) for Allowance of Compensation and Reimbursement of Expenses for the Services Rendered for the Period of June 1, 2025 through June 30, 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 29, 2025, at 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](mailto: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](mailto:rmschechter@pbnlaw.com)  
E-mail: [cpmazza@pbnlaw.com](mailto:cpmazza@pbnlaw.com)

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<sup>1</sup>The last four digits of SC Healthcare Holding, LLC’s tax identification number are 2584. The mailing address for SC Healthcare Holding, LLC is c/o Petersen Health Care Management, LLC 830 West Trailcreek Dr., Peoria, IL 61614. Due to the large number of Debtors in these Chapter 11 Cases, whose cases are being jointly administered, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information is available on a website of the Debtors’ claims and noticing agent at [www.kccllc.net/Petersen](http://www.kccllc.net/Petersen).

**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: August 15, 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.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 24-10443 (TMH)

(Jointly Administered)

**CERTIFICATE OF SERVICE**

I hereby certify that on this 15<sup>th</sup> day of August, 2025, I caused to be filed with the Court electronically, and I caused to be served a true and correct copy of the:

**FIFTEENTH 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 JUNE 1, 2025 THROUGH JUNE 30, 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

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<sup>1</sup>The last four digits of SC Healthcare Holding, LLC's tax identification number are 2584. The mailing address for SC Healthcare Holding, LLC is c/o Petersen Health Care Management, LLC 830 West Trailcreek Dr., Peoria, IL 61614. Due to the large number of Debtors in these Chapter 11 Cases, whose cases are being jointly administered, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information is available on a website of the Debtors' claims and noticing agent at [www.kccllc.net/Petersen](http://www.kccllc.net/Petersen).



**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  
York, NY 10019

*Counsel to DIP Lender*

Morris James LLP  
Attn: Eric J. Monzo  
500 Delaware Avenue  
Suite 1500  
Wilmington, DE 19801

*Counsel to DIP Lender*

Holland & Knight, LLP  
Attn: Tyler Lane  
511 Union Street, Ste. 2700  
Nashville, Tennessee 37219

*Counsel to Column Financial, Inc.*

Landis Rath & Cobb LLP  
Attn: Adam Landis, Rick Cobb  
919 Market Street, Suite 1800  
P.O. Box 2087  
Wilmington, Delaware 19899

*Counsel to Column Financial, Inc.*

Greenberg Traurig, LLP  
Attn: Nancy A. Peterman, Danny  
Duerdoth  
77 West Wacker Drive  
Suite 3100  
Chicago, IL 60601

-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*