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

In re: Chapter 11

SC HEALTHCARE HOLDING, LLC, et al., Case No. 24-10443 (TMH)

Debtors. (Jointly Administered)

Obj. Deadline: September 26, 2025 at 4:00 p.m.

Hearing Date: October 8, 2025 at 11 am

SUMMARY OF CONSOLIDATED FIFTH INTERIM FEE APPLICATION AND FINAL FEE APPLICATION OF SAK MANAGEMENT SERVICES, LLC D/B/A SAK HEALTHCARE, AS MEDICAL OPERATIONS ADVISOR TO THE PATIENT CARE OMBUDSMAN, FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD OF APRIL 16, 2024 THROUGH AUGUST 7, 2025

SAK Management Services, LLC d/b/a SAK Healthcare ("SAK"), medical operations advisor 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 files its final fee application (the "Application") seeking 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") for allowance of final compensation in the amount of \$1,055,837.50 and reimbursement of expenses in the amount \$69,112.36 for the period of April 16, 2024 through August 7, 2025 (the "Final Compensation Period"), and in support thereof, SAK respectfully represents as follows:

<sup>&</sup>lt;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.



#### **JURISDICTION**

- 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 "<u>Petition Date</u>"), 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 (the "Ombudsman").
- 9. On May 8, 2024, the Ombudsman filed an application seeking the retention of SAK as medical operations advisor for the Ombudsman *nunc pro tunc to* April 16, 2024 [D.I. 275] (the "SAK Retention Application"). A Certification of No Objection regarding the SAK Retention Application was filed on May 23, 2024 [D.I. 351]. The Order approving the SAK Retention Application was entered on May 24, 2024 [D.I. 365].
- 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.

11. Furthermore, the Interim Compensation Order provides that, beginning with the approximate three-month period from the Petition Date and ending on June 30, 2024, and at three-month intervals thereafter (each, "Interim Fee Period"), each of the Retained Professionals (as defined in the Interim Compensation Order) must file with the Court and serve on the Notice Parties a request for interim Court approval and allowance, pursuant to section 331 of the Bankruptcy Code, of the compensation and reimbursement of expenses sought in the Monthly Fee Applications filed during such three-month period.

#### SERVICES PROVIDED BY SAK

12. During this Final Compensation Period, SAK, in its capacity as medical operations advisors for the Ombudsman, devoted substantial time regarding the following:

### a. <u>Case Administration</u>

Hours: 107.00 Fees: \$53,545.00

This category includes services related to the general administration of these cases, including, without limitation, maintaining a case calendar, attending teleconference calls regarding facility status, resident care and record retention and disposal issues, and conferring with the Debtors' representatives and the Ombudsman's counsel on status of the cases. The Ombudsman dealt with significant complicated issues while overseeing a vast number of facilities, including, but not limited to, issues relating to appropriate resident care, management of resident funds, shortages of supplies and compliance with health code standards. The Ombudsman fulfilling her duties as a monitor of the safety and care of the residents at the Debtors' facilities was an imperative undertaking through this process that required considerable organization and coordination with the Debtors' management team. The Ombudsman was successful in securing a cooperative approach with the Debtors' senior management team and operational personnel

throughout these cases. Specifically, during the administration of these cases and the Final Compensation Period, SAK had sought and obtained information from, and assured open lines of communications with, the Debtors to assure that information flowed in an efficient and effective manner due to the large number of facilities operated by the Debtors and the compliance issues that required oversight until the Debtors' licenses were no longer being utilized. The Ombudsman monitored all information shared by her counsel during the cases and gathered directly from the teams operating the subject facilities to ensure consistent monitoring of resident interests and rights as well as adherence to state and federal regulations.

### b. <u>Data Analysis</u>

Hours: 1,103.00 Fees: \$492,697.50

This category includes services related to time spent compiling the information the Ombudsman received from visiting the vast number of the Debtors' facilities, reviewing state and local guidelines regarding public health, fire safety and emergency preparedness, and reviewing the facilities' policies and generally observing resident care at each facility. The Ombudsman employed a standardized approach to gathering the information necessary to fulfill her duties and to achieve maximum efficiency due to the large number of facilities spread out over a significant geographical area. Where identified, the Ombudsman and her representatives identified any concerns with the management of the Debtors and analyzed how these concerns could be properly addressed to both maintain the safety of the residents as well as to identify any issues with the Debtors' facilities that needed to be addressed so that they were in compliance with all pertinent regulations. The Ombudsman and her representatives also recorded information relating to license status issues to monitor the Debtors' facilities' transitions to new operators during the time period when the Debtors' licenses continued to be utilized. Ultimately, the Ombudsman's efforts assisted

with a successful transition of the Debtors' facilities to new operators by providing oversight focused on maintaining an adequate standard of care for residents, their privacy and the facilities at issue.

#### c. Report Preparation

Hours: 679.80 Fees: \$307,380.00

This category includes services related to drafting, reviewing, revising and finalizing site visit reports and the Ombudsman's periodic reports. During the Final Compensation Period, the transfer of the Debtors' licenses to the new buyers or the buyers' operators had not yet been fully completed. During this transitional period, the Ombudsman and her representatives continued to conduct visits, so long as the facilities continued to be operating under the Debtors' licenses so that appropriate information was included in the Ombudsman's reports. With respect to each of the facilities visited, at the conclusion of each visit the Ombudsman's representatives drafted a report summarizing observations from the visit that related to the facility's day-to-day operations and patient care. For example, each facility report contained observations related to, inter alia, the facility's compliance with the appropriate state's long term care facility regulations, resident treatment (which includes resident interview(s)), clinical and staffing services, emergency preparedness, and resident trust funds. The Ombudsman and her representatives carefully reviewed and revised each facility report after the initial draft to make the information readily available to all parties-in-interest. The reports were a necessary vehicle to not only ensure residents that their concerns and rights were being properly monitored by the Ombudsman but to also provided a detailed status on the issues that needed continued attention at the facilities. The reports were a crucial part of these cases for ensuring confidence to the residents and parties-in-interest as a whole.

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d. <u>Travel Time</u>

Hours: 443.40 Fees: \$186,557.50

This category includes services related to non-working travel related to visiting facilities. The Ombudsman and her representatives worked during travel whenever possible, but this was not often possible due to the travel constraints and necessities to visit each facility that required automotive travel. Finally, SAK billed all non-working travel time by half of its standard hourly rates. The Ombudsman and her representatives conducted in-person visits at the Debtors' many facilities throughout the case including in rural Illinois and Missouri. With facilities in remote areas, the Ombudsman and her representatives traveled as efficiently as possible but in person visits did often require significant time to be spent traveling by car to ensure residents in rural locations were receiving the appropriate oversight of important care issues notwithstanding their location.

#### MONTHLY FEE APPLICATIONS

- 13. On June 6, 2024, SAK filed its first monthly application for compensation and reimbursement of expenses [D.I. 514] (the "First Monthly Application"). By the First Monthly Application, SAK sought approval of compensation of \$29,815.00 and reimbursement of expenses in the amount of \$1,067.41 for the period of April 16, 2024 through April 30, 2024. The deadline to object to the First Monthly Application was June 20, 2024. On June 21, 2024, SAK filed a certificate of no objection to the First Monthly Application [D.I. 549].
- 14. On July 11, 2024, SAK filed its second monthly application for compensation and reimbursement of expenses [D.I. 659] (the "Second Monthly Application"). By the Second Monthly Application, SAK sought approval of compensation of \$74,030.00 and reimbursement of expenses in the amount of \$7,440.76 for the period of May 1, 2024 through May 31, 2024. The

deadline to object to the Second Monthly Application was July 25, 2024. On July 26, 2024, SAK filed a certificate of no objection to the Second Monthly Application [D.I. 717].

- 15. On August 9, 2024, SAK filed its third monthly application for compensation and reimbursement of expenses [D.I. 744] (the "Third Monthly Application"). By the Third Monthly Application, SAK sought approval of compensation of \$174,680.00 and reimbursement of expenses in the amount of \$11,137.35 for the period of June 1, 2024 through June 30, 2024. The deadline to object to the Third Monthly Application was August 23, 2024. On August 26, 2024, SAK filed a certificate of no objection to the Third Monthly Application [D.I. 787].
- 16. On September 16, 2024, SAK filed its fourth monthly application for compensation and reimbursement of expenses [D.I. 835] (the "Fourth Monthly Application"). By the Fourth Monthly Application, SAK sought approval of compensation of \$121,335.00 and reimbursement of expenses in the amount of \$6,961.91 for the period of July 1, 2024 through July 31, 2024. The deadline to object to the Fourth Monthly Application was October 7, 2024. On October 9, 2024, SAK filed a certificate of no objection to the Fourth Monthly Application [D.I. 902].
- 17. On October 28, 2024, SAK filed its fifth monthly application for compensation and reimbursement of expenses [D.I. 951] (the "Fifth Monthly Application"). By the Fifth Monthly Application, SAK sought approval of compensation of \$139,780.00 and reimbursement of expenses in the amount of \$6,834.46 for the period of August 1, 2024 through August 31, 2024. The deadline to object to the Fifth Monthly Application was November 11, 2024. On November 13, 2024, SAK filed a certificate of no objection to the Fifth Monthly Application [D.I. 998].
- 18. On October 31, 2024, SAK filed its sixth monthly application for compensation and reimbursement of expenses [D.I. 965] (the "Sixth Monthly Application"). By the Sixth Monthly Application, SAK sought approval of compensation of \$122,985.00 and reimbursement

of expenses in the amount of \$9,113.69 for the period of September 1, 2024 through September 30, 2024. The deadline to object to the Sixth Monthly Application was November 14, 2024. On November 15, 2024, SAK filed a certificate of no objection to the Six Monthly Application [D.I. 1018].

- 19. On December 20, 2024, SAK filed its seventh monthly application for compensation and reimbursement of expenses [D.I. 1110] (the "Seventh Monthly Application"). By the Seventh Monthly Application, SAK sought approval of compensation of \$136,515.00 and reimbursement of expenses in the amount of \$10,940.18 for the period of October 1, 2024 through October 31, 2024. The deadline to object to the Seventh Monthly Application was January 3, 2025. On January 6, 2025, SAK filed a certificate of no objection to the Seventh Monthly Application [D.I. 1158].
- 20. On December 27, 2024, SAK filed its eighth monthly application for compensation and reimbursement of expenses [D.I. 1130] (the "Eighth Monthly Application"). By the Eighth Monthly Application, SAK sought approval of compensation of \$109,875.00 and reimbursement of expenses in the amount of \$8,049.52 for the period of November 1, 2024 through November 30, 2024. The deadline to object to the Eighth Monthly Application was January 10, 2025. On January 14, 2025, SAK filed a certificate of no objection to the Eighth Monthly Application [D.I. 1186].
- 21. On February 11, 2025, SAK filed its ninth monthly application for compensation and reimbursement of expenses [D.I. 1252] (the "Ninth Monthly Application"). By the Ninth Monthly Application, SAK sought approval of compensation of \$79,645.00 and reimbursement of expenses in the amount of \$5,659.47 for the period of December 1, 2024 through December 31, 2024. The deadline to object to the Ninth Monthly Application was February 25, 2025. On

February 27, 2025, SAK filed a certificate of no objection to the Ninth Monthly Application [D.I. 1294].

- 22. On March 17, 2025, SAK filed its tenth monthly application for compensation and reimbursement of expenses [D.I. 1342] (the "<u>Tenth Monthly Application</u>"). By the Tenth Monthly Application, SAK sought approval of compensation of \$45,627.50 and reimbursement of expenses in the amount of \$1,907.61 for the period of January 1, 2025 through January 31, 2025. The deadline to object to the Tenth Monthly Application was March 31, 2025. On April 2, 2025, SAK filed a certificate of no objection to the Tenth Monthly Application [D.I. 1374].
- 23. On April 11, 2025, SAK filed its eleventh monthly application for compensation and reimbursement of expenses [D.I. 1384] (the "Eleventh Monthly Application"). By the Eleventh Monthly Application, SAK sought approval of compensation of \$14,882.50 and reimbursement of expenses in the amount of \$0.00 for the period of February 1, 2025 through February 28, 2025. The deadline to object to the Eleventh Monthly Application was April 25, 2025. On May 7, 2025, SAK filed a certificate of no objection to the Eleventh Monthly Application [D.I. 1557].
- 24. On May 14, 2025, SAK filed its twelfth monthly application for compensation and reimbursement of expenses [D.I. 1573] (the "Twelfth Monthly Application"). By the Twelfth Monthly Application, SAK sought approval of compensation of \$3,517.50 and reimbursement of expenses in the amount of \$0.00 for the period of March 1, 2025 through March 31, 2025. The deadline to object to the Twelfth Monthly Application was May 28, 2025. On June 23, 2025, SAK filed a certificate of no objection to the Twelfth Monthly Application [D.I. 1705].
- 25. On May 14, 2025, SAK filed its thirteenth monthly application for compensation and reimbursement of expenses [D.I. 1573] (the "Thirteenth Monthly Application"). By the

Thirteenth Monthly Application, SAK sought approval of compensation of \$2,362.50 and reimbursement of expenses in the amount of \$0.00 for the period of April 1, 2025 through April 30, 2025. The deadline to object to the Thirteenth Monthly Application was May 28, 2025. On June 23, 2025, SAK filed a certificate of no objection to the Thirteenth Monthly Application [D.I. 1707].

- 26. On July 29, 2025, SAK filed its fourteenth monthly application for compensation and reimbursement of expenses [D.I. 1742] (the "Fourteenth Monthly Application"). By the Fourteenth Monthly Application, SAK sought approval of compensation of \$682.50 and reimbursement of expenses in the amount of \$0.00 for the period of May 1, 2025 through May 31, 2025. The deadline to object to the Fourteenth Monthly Application was August 12, 2025. On August 13, 2025, SAK filed a certificate of no objection to the Fourteenth Monthly Application [D.I. 1765].
- 27. On August 15, 2025, SAK filed its fifteenth monthly application for compensation and reimbursement of expenses [D.I. 1768] (the "Fifteenth Monthly Application"). By the Fifteenth Monthly Application, SAK sought approval of \$105.00 in fees and reimbursement of expenses in the amount of \$0.00 for the period of June 1, 2025 through June 30, 2025. The deadline to object to the Fifteenth Monthly Application is August 29, 2025.
- 28. The total sum due to SAK for professional services rendered on behalf of the Ombudsman during the Final Compensation Period is \$1,055,837.50 A chart detailing the fees in each of the applications during the Final Compensation Period, by professional and by category, is attached as **Exhibit A**. SAK submits that the professional services it rendered on behalf of the Ombudsman during this time were both reasonable and necessary.

- 29. SAK incurred \$69,112.36 of expenses during the Final Compensation Period. A chart detailing the specific disbursements during the Final Compensation Period is attached hereto as **Exhibit B**.
- 30. The undersigned hereby attests that she has reviewed the requirements of Local Rule 2016-1 and this Application conforms to such requirements, including that travel time was not billed at more than half rate and copying charges were only \$.10 per page.

### **VALUATION OF SERVICES**

- 31. Professionals of SAK have expended a total of 2,370.90 hours in connection with this matter during the Final Compensation Period.
- 32. The amount of time spent by each of the professionals providing services to the Ombudsman for the Final Compensation Period is set forth in **Exhibit A** hereto. The rates are SAK's normal hourly rates of compensation for work of this character, which includes a slight increase in SAK's rates for 2025 that was applied to all of SAK's clients. The reasonable value of the services rendered by SAK for the Final Compensation Period as the medical operations advisor for the Ombudsman in these cases is \$1,055,837.50. SAK previously agreed to a voluntary discount to assist moving this case to confirmation of the plan along with other estate professionals. While this application seeks allowance of the fees and disbursements noted herein, no further payment is due to SAK.
- 33. In accordance with the factors enumerated in Bankruptcy Code section 330, SAK 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. SAK's fees

are reasonable and appropriate under the applicable legal standard, and should therefore be allowed.

34. SAK 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. Accordingly, by this Application, SAK requests that the Court allow and approve one hundred (100%) of the fees and expenses incurred by SAK during the Final Compensation Period of April 16, 2024 through August 7, 2025, although no further payment is due to SAK in accordance with the voluntary discount agreed to by SAK.

#### **NOTICE**

35. Notice of this Application will be given via first class mail to: (a) the Debtors, 830 W. Peoria, Drive, IL61614, David R. Trailcreek Attn: Campbell (dcampbell@getzlerhenrich.com); (b) co-counsel to the Debtors, Winston & Strawn LLP, 35 West Wacker Drive, Chicago, IL 60601, Attn.: Gregory M. Gartland (ggartland@winston.com), Daniel J. McGuire (dmcguire@winston.com), and Joel McKnight Mudd (jmudd@winston.com) and 200 Park Avenue, New York, NY 10166, Attn.: Carrie V. Hardman (chardman@winston.com) and Young Conaway Stargatt & Taylor, LLP, Rodney Square, 1000 North King Street, Wilmington, DE 19801, Attn.: Andrew L. Magaziner (amagaziner@ycst.com), Shella Borovinskaya (sborovinskaya@ycst.com), and Carol E. Cox (ccox@ycst.com); (c) the U.S. Trustee, 844 King Street, Suite 2207, Lockbox 35, Wilmington, DE 19801, Attn: Linda Richenderfer (Linda.Richenderfer@usdoj.gov) and Jon Lipshie (Jon.Lipshie@usdoj.gov); (d) counsel to the Official Committee of Unsecured Creditors, Greenberg Traurig, LLP, 77 West Wacker Drive, Suite 3100, Chicago, IL 60601, Attn: Nancy A. Peterman (peterman@gtlaw.com) and Danny Duerdoth (duerdothd@gtlaw.com), and 1000 Louisiana Street, Suite 6700, Houston, TX 77002,

Attn: Shari L. Heyen (shari.heyen@gtlaw.com), and 222 Delaware Avenue, Suite 1600, Wilmington, DE 19801, Attn: Anthony W. Clark (anthony.clark@gtlaw.com) and Dennis A. Meloro (dennis.meloro@gtlaw.com); (e) counsel to the DIP Lender, Norton Rose Fulbright US LLP, 1301 Avenue of the Americas, New York, NY 10019, Attn: Robert M. Hirsh (robert.hirsh@nortonrosefulbright.com) and Emily Hong (emily.hong@nortonrosefulbright.com) and Morris James LLP, 500 Delaware Avenue, Suite 1500, Wilmington, DE 19801, Attn: Eric J. Monzo (emonzo@morrisjames.com); and (f) counsel to Column Financial, Inc., Holland & Knight, LLP, 511 Union Street, Ste. 2700, Nashville, Tennessee 37219, Attn: Tyler Lane (tyler.layne@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).

#### **RESERVATION OF RIGHTS**

36. SAK does not waive, and expressly reserves its right to respond to any objections regarding this Application and the amounts sought hereunder.

### NO PRIOR REQUEST

37. No previous request for the relief sough herein has been made to this Court or to any other court.

WHEREFORE, SAK respectfully requests pursuant to the procedures allowed in the Final Compensation Order: (i) approval of allowance of final compensation for necessary and valuable medical advisor services rendered by SAK to the Ombudsman in the sum of \$1,055,837.50 and reimbursement of expenses in the sum of \$69,112.36 for the period from April 16, 2024 through June 30, 2025; (ii) payment of such sums, including payment of any 20% holdback that was withheld from payment under the Monthly Fee Applications, which has already been made in full

due to the voluntary discount agreed to by SAK; and (iii) such other and further relief as is just and proper.

Date: September 5, 2025

/s/ Cheryl A. Santaniello

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-and-

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Counsel for the Patient Care Ombudsman

## **EXHIBIT A**

## **Compensation By Category for Final Compensation Period**

### **Compensation By Category for Final Compensation Period**

	First Monthly Application (April 16, 2024 through April 30, 2024)		<b>Appl</b> (May 1, 2	Monthly ication 024 through 1, 2024)	Third Monthly Application (June 1, 2024 through June 30, 2024)	
	Hours	Amount	Hours	Amount	Hours	Amount
Case Administration	24.10	\$11,965.00	31.00	\$15,240.00	3.00	\$1,500.00
Data Analysis	31.30	\$14,595.00	84.00	\$36,855.00	205.80	\$90,430.00
Fee/Employment Application	0.00	\$0.00	8.60	\$2,900.00	10.80	\$4,050.00
Report Preparation	0.00	\$0.00	11.90	\$5,205.00	109.20	\$49,895.00
Travel Time <sup>1</sup>	7.10	\$3,255.00	32.20	\$13,830.00	68.50	\$28,805.00
TOTAL:	62.50	\$29,815.00	167.70	\$74,030.00	397.30	\$174,680.00

	Fourth Monthly Application (July 1, 2024 through July 31, 2024)		Appl (August 1,	Monthly ication 2024 through 31, 2024)	Sixth Monthly Application (September 1, 2024 through September 30, 2024)	
	Hours	Amount	Hours	Amount	Hours	Amount
Case Administration	10.60	\$5,290.00	4.70	\$2,350.00	2.80	\$1,395.00
Data Analysis	163.30	\$71,215.00	89.20	\$39,415.00	157.90	\$72,010.00
Document Preparation	0.50	\$225.00	0.00	\$0.00	0.00	\$0.00
Fee/Employment Application	7.00	\$3,500.00	7.80	\$3,450.00	0.80	\$400.00
Report Preparation	51.10	\$22,690.00	172.40	\$77,530.00	55.40	\$23,570.00
Travel Time	44.20	\$18,415.00	41.80	\$17,035.00	61.50	\$25,610.00
TOTAL:	276.70	\$121,335.00	315.90	\$139,780.00	278.40	\$122,985.00

<sup>&</sup>lt;sup>1</sup> Non-working travel billed at 50% as applied to each application.

	Seventh Monthly Application (October 1, 2024 through October 31, 2024)		Appl (Novemb thr	Monthly ication per 1, 2024 ough er 30, 2024)	Ninth Monthly Application (December 1, 2024 through December 31, 2024)		
	Hours	Amount	Hours	Amount	Hours	Amount	
Case Administration	3.60	\$1,800.00	9.80	\$4,900.00	1.20	\$600.00	
Data Analysis	157.70	\$70,595.00	112.60	\$51,170.00	70.70	\$31,630.00	
Fee/Employment Application	0.30	\$150.00	0.60	\$300.00	0.00	\$0.00	
Report Preparation	70.90	\$31,330.00	66.50	\$29,295.00	65.40	\$30,275.00	
Travel Time	76.80	\$32,640.00	58.40	\$24,210.00	40.80	\$17,140.00	
TOTAL:	309.30	\$136,515.00	247.90	\$109,875.00	178.10	\$79,645.00	

	Tenth Monthly Application (January 1, 2025 through January 31, 2025)		Appl (February 1,	n Monthly ication 2025 through (28, 2025)	Twelfth Monthly Application (March 1, 2025 through March 31, 2025)		
	Hours	Amount	Hours	Amount	Hours	Amount	
Case Administration	11.90	\$6,247.50	0.00	\$0.00	1.70	\$892.50	
Data Analysis	25.10	\$11,947.50	2.70	\$1,417.50	2.40	\$1,260.00	
Fee/Employment Application	0.00	\$0.00	0.00	\$0.00	0.00	\$0.00	
Report Preparation	46.20	\$21,815.00	26.40	\$13,465.00	2.60	\$1,365.00	
Travel Time	12.10 \$5,617.50		0.00	\$0.00	0.00	\$0.00	
TOTAL:	95.30	\$45,627.50	29.10	\$14,882.50	6.70	\$3,517.50	

	Thirteenth Monthly Application (April 1, 2025 through April 30, 2025)		Appl (May 1, 2	th Monthly ication 025 through 1, 2025)	Fifteenth Monthly Application (June 1, 2025 through June 30, 2025)	
	Hours	Amount	Hours	Amount	Hours	Amount
Case Administration	2.40	\$1,260.00	0.00	\$0.00	0.20	\$105.00
Data Analysis	0.30	\$157.50	0.00	\$0.00	0.00	\$0.00
Fee/Employment Application	0.00	\$0.00	1.30	\$682.50	0.00	\$0.00
Report Preparation	1.80	\$945.00	0.00	\$0.00	0.00	\$0.00
Travel Time	0.00 \$0.00		0.00	\$0.00	0.00	\$0.00
TOTAL:	4.50	\$2,362.50	1.30	\$682.50	0.20	\$105.00

		Total
	Hours	Amount
Case Administration	107.00	\$53,545.00
Data Analysis	1,103.00	\$492,697.50
Document Preparation	0.50	\$225.00
Fee/Employment Application	37.20	\$15,432.50
Report Preparation	679.80	\$307,380.00
Travel Time	443.40	\$186,557.50
TOTAL:	2,370.90	\$1,055,837.50

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**Timekeeper Summary for Final Compensation Period** 

### **Timekeeper Summary for Final Compensation Period**

			First Monthly Application (April 16, 2024 through April 30, 2024)		Second Monthly Application (May 1, 2024 through May 31, 2024)		Third Monthly Application (June 1, 2024 through June 30, 2024)	
Timekeeper	Position	2024 Rate	Hours	Amount	Hours	Amount	Hours	Amount
Suzanne Koenig	President & CEO	\$500.00	31.002	\$15,415.00	43.80	\$21,900.00	68.10	\$34,050.00
Jennifer Meyerowitz	General Counsel	\$500.00	4.50	\$2,250.00	5.60	\$2,800.00	6.10	\$3,050.00
Carrie Lynn Baker	Senior Managing Director of Clinical and Operations	\$450.00	$9.40^{3}$	\$4,230.00	13.80	\$6,210.00	0.00	\$0.00
Keith Hufsey	Vice President of Clinical and Regulatory Operations	\$450.00	7.50 <sup>4</sup>	\$3,375.00	20.60	\$9,270.00	124.60	\$56,070.00
Ragina Channell	Senior Managing Director of Clinical and Operations	\$450.00	10.10 <sup>5</sup>	\$4,545.00	22.60	\$10,170.00	30.10	\$13,545.00
Richard Snider	Chief Strategy Officer	\$450.00	0.00	\$0.00	0.00	\$0.00	28.30	\$12,735.00
Jude Langan	Regional Director of Operations	\$400.00	0.00	\$0.00	55.70	\$22,280.00	134.70	\$53,880.00
Lisa Ciesla	Executive Assistant & Office Manager	\$250.00	0.00	\$0.00	2.20	\$550.00	0.00	\$0.00
Daniel Haracz	Executive Assistant & Billing Coordinator	\$250.00	0.00	\$0.00	3.40	\$850.00	5.40	\$1,350.00
TOTAL			62.50	\$29,815.00	167.70	\$74,030.00	397.30	\$174,680.00

<sup>&</sup>lt;sup>2</sup> 1.2 hours billed at \$250.00.

 <sup>&</sup>lt;sup>3</sup> 1.6 hours billed at \$225.00.
 <sup>4</sup> 2.7 hours billed at \$225.00.

<sup>&</sup>lt;sup>5</sup> 1.6 hours billed at \$225.00.

			Fourth Monthly Application (July 1, 2024 through July 31, 2024)		Fifth Monthly Application (August 1, 2024 through August 31, 2024)		Sixth Monthly Application (September 1, 2024 throug) September 30, 2024)	
Timekeeper	Position	2024 Rate	Hours	Amount	Hours	Amount	Hours	Amount
Suzanne Koenig	President & CEO	\$500.00	57.90	\$28,950.00	91.00	\$45,500.00	72.20	\$36,100.00
Jennifer Meyerowitz	General Counsel	\$500.00	7.00	\$3,500.00	8.30	\$4,150.00	1.60	\$800.00
Keith Hufsey	Vice President of Clinical and Regulatory Operations	\$450.00	82.60	\$37,170.00	9.90	\$4,455.00	80.20	\$36,000.00
Ragina Channell	Senior Managing Director of Clinical and Operations	\$450.00	0.20	\$90.00	10.50	\$4,725.00	0.00	\$0.00
Richard Snider	Chief Strategy Officer	\$450.00	0.50	\$225.00	54.80	\$24,660.00	6.50	\$2,925.00
Jude Langan	Regional Director of Operations	\$400.00	128.50	\$51,400.00	139.60	\$55,840.00	117.90	\$47,160.00
Daniel Haracz	Executive Assistant & Billing Coordinator	\$250.00	0.00	\$0.00	1.80	\$450.00	0.00	\$0.00
TOTAL			276.70	\$121,335.00	315.90	\$139,780.00	278.40	\$122,985.00

			Seventh Monthly Application (October 1, 2024 through October 31, 2024)		Eighth Monthly Application (November 1, 2024 through November 30, 2024)		Ninth Monthly Application (December 1, 2024 through December 31, 2024)	
Timekeeper	Position	2024 Rate	Hours	Amount	Hours	Amount	Hours	Amount
Suzanne Koenig	President & CEO	\$500.00	72.30	\$36,515.00	64.90	\$32,450.00	45.90	\$22,950.00
Jennifer Meyerowitz	General Counsel	\$500.00	2.40	\$1,200.00	2.30	\$1,150.00	1.80	\$900.00
Keith Hufsey	Vice President of Clinical and Regulatory Operations	\$450.00	106.50	\$47,925.00	56.40	\$25,380.00	72.70	\$32,715.00
Richard S. Snider	Chief Strategy Officer	\$450.00	0.00	\$0.00	23.50	\$10,575.00	0.00	\$0.00
Jude Langan	Regional Director of Operations	\$400.00	128.10	\$51,240.00	100.80	\$40,320.00	57.70	\$23,080.00
TOTAL			309.30	\$136,515.00	247.90	\$109,875.00	178.10	\$79,645.00

			Tenth Monthly Application (January 1, 2025 through January 31, 2025)		Eleventh Monthly Application (February 1, 2025 through February 28, 2025)		Twelfth Monthly Application (March 1, 2025 through March 31, 2025)	
Timekeeper	Position	2025 Rate	Hours	Amount	Hours	Amount	Hours	Amount
Suzanne Koenig	President & CEO	\$525.00	22.30	\$11,707.50	21.20	\$11,130.00	6.70	\$3,517.50
Jennifer Meyerowitz	General Counsel	\$525.00	0.40	\$210.00	0.00	\$0.00	0.00	\$0.00
Keith Hufsey	Vice President of Clinical and Regulatory Operations	\$475.00	42.10	\$19,997.50	0.40	\$190.00	0.00	\$0.00
Richard S. Snider	Chief Strategy Officer	\$475.00	15.00	\$7,125.00	7.50	\$3,562.50	0.00	\$0.00

			<b>Ap</b> (January	th Monthly oplication 1, 2025 through ary 31, 2025)	Eleventh Monthly Application (February 1, 2025 through February 28, 2025)		Appli (March 1, 2	Monthly cation 025 through 1, 2025)
Timekeeper	Position	2025 Rate	Hours	Amount	Hours	Amount	Hours	Amount
Jude Langan	Regional Director of Operations	\$425.00	15.50	\$6,587.50	0.00	\$0.00	0.00	\$0.00
TOTAL			95.30	\$46,627.50	29.10	\$14,882.50	6.70	\$3,517.50

			Thirteenth Monthly Application (April 1, 2025 through April 30, 2025)		Fourteenth Monthly Application (May 1, 2025 through May 31, 2025)		Fifteenth Monthly Application (June 1, 2025 through June 30, 2025)	
Timekeeper	Position	2025 Rate	Hours	Amount	Hours	Amount	Hours	Amount
Suzanne Koenig	President & CEO	\$525.00	4.50	\$2,362.50	1.30	\$682.50	0.20	\$105.00
Jennifer Meyerowitz	General Counsel	\$525.00	0.00	\$0.00	0.00	\$0.00	0.00	\$0.00
Keith Hufsey	Vice President of Clinical and Regulatory Operations	\$475.00	0.00	\$0.00	0.00	\$0.00	0.00	\$0.00
Richard S. Snider	Chief Strategy Officer	\$475.00	0.00	\$0.00	0.00	\$0.00	0.00	\$0.00
Jude Langan	Regional Director of Operations	\$425.00	0.00	\$0.00	0.00	\$0.00	0.00	\$0.00
TOTAL			4.50	\$2,362.50	1.30	\$682.50	0.20	\$105.00

					TOTAL
Timekeeper	Position	2024 Rate	2025 Rate	Hours	Amount
Suzanne Koenig	President & CEO	\$500.00	\$525.00	603.30 <sup>6</sup>	\$303,315.00
Jennifer Meyerowitz	General Counsel	\$500.00	\$525.00	40.00	\$20,010.00
Carrie Lynn Baker	Senior Managing Director of Clinical and Operations	\$450.00	N/A	$23.20^{7}$	\$10,440.00
Keith Hufsey	Vice President of Clinical and Regulatory Operations	\$450.00	\$475.00	603.508	\$272,547.50
Ragina Channell	Senior Managing Director of Clinical and Operations	\$450.00	N/A	73.509	\$33,075.00
Richard S. Snider	Chief Strategy Officer	\$450.00	\$475.00	136.10	\$61,807.50
Jude Langan	Regional Director of Operations	\$400.00	\$425.00	878.50	\$351,787.50
Lisa Ciesla	Executive Assistant & Office Manager	\$250.00	N/A	2.20	\$550.00
Daniel Haracz	Executive Assistant & Billing Coordinator	\$250.00	N/A	10.60	\$2,650.00
TOTAL				2,370.90	\$1,055,837.50

<sup>&</sup>lt;sup>6</sup> 1.20 hours billed at \$250.00.

 <sup>7 1.60</sup> hours billed at \$225.00.
 8 2.70 hours billed at \$225.00.
 9 1.60 hours billed at \$225.00.

## **EXHIBIT B**

### **Summary of Expenses for Final Compensation Period**

### **Summary of Expenses for Final Compensation Period**

	Disbursements	First Monthly Application (April 16, 2024 through April 30, 2024)	Second Monthly Application (May 1, 2024 through May 31, 2024)	Third Monthly Application (June 1, 2024 through June 30, 2024)
	Filing/Court Fees Payable to Clerk of Court. (Admission Fees)	\$0.00	\$0.00	
<b>b</b> )	Computer Assisted Legal Research Westlaw, Lexis and a description of manner calculated.	\$0.00	\$0.00	
c)	Pacer Fees Payable to the Pacer Service Center for search and/or print.	\$0.00	\$0.00	\$0.00
d)	Fax (with rates) No. of Pages Rate per Page (Max. \$1.00/pg.)	\$0.00	\$0.00	\$0.00
e)	Case Specific Telephone / Conference Call Charges Exclusive of overhead charges. Court Appearances	\$0.00	\$0.00	\$0.00
f)	In-House Reproduction Services Exclusive of overhead charges.	\$0.00	\$0.00	\$0.00
g)	Outside Reproduction Services Including scanning services.	\$0.00	\$0.00	\$0.00
h)	Other Research Title searches, UCC searches, Asset searches, Accurint.	\$0.00	\$0.00	\$0.00
i)	Court Reporting / Deposition Services Transcripts.	\$0.00	\$0.00	\$0.00
<b>j</b> )	Travel Mileage, rolls, airfare and parking	\$880.96	\$3,776.88	\$6,446.57
k)	Courier & Express Carriers Overnight and personal delivery	\$0.00	\$0.00	\$0.00
1)	Postage	\$0.00	\$0.00	\$0.00
m)	Other (specify) – Business Meals	\$186.45	\$818.23	\$1,224.19
n)	Other (specify) – Hotel	\$0.00	\$2,845.65	\$3,466.59
	DISBURSEMENTS TOTAL	\$1,067.41	\$7,440.76	\$11,137.35

	Disbursements	Fourth Monthly Application (July 1, 2024 through July 31, 2024)	Fifth Monthly Application (August 1, 2024 through August 31, 2024)	Sixth Monthly Application (September 1, 2024 through September 30, 2024)
a)	Filing/Court Fees Payable to Clerk of Court. (Admission Fees)	\$0.00	\$0.00	\$0.00
<b>b</b> )	Computer Assisted Legal Research Westlaw, Lexis and a description of manner calculated.	\$0.00	\$0.00	\$0.00
c)	Pacer Fees Payable to the Pacer Service Center for search and/or print.	\$0.00	\$0.00	\$0.00
d)	Fax (with rates) No. of Pages Rate per Page (Max. \$1.00/pg.)	\$0.00	\$0.00	\$0.00
<b>e</b> )	Case Specific Telephone / Conference Call Charges Exclusive of overhead charges. Court Appearances	\$0.00	\$0.00	\$0.00
f)	In-House Reproduction Services Exclusive of overhead charges.	\$0.00	\$0.00	\$0.00
g)	Outside Reproduction Services Including scanning services.	\$0.00	\$0.00	\$0.00
h)	Other Research Title searches, UCC searches, Asset searches, Accurint.	\$0.00	\$0.00	\$0.00
i)	Court Reporting / Deposition Services Transcripts.	\$0.00	\$0.00	\$0.00
j)	Travel Mileage, rolls, airfare and parking	\$4,216.23	\$4,925.83	\$7,225.95
k)	Courier & Express Carriers Overnight and personal delivery	\$0.00	\$0.00	\$0.00
1)	Postage	\$0.00	\$0.00	\$0.00
m)	Other (specify) – Business Meals	\$517.47	\$577.55	\$632.58
n)	Other (specify) – Hotel	\$2,228.21	\$1,331.08	\$1,255.16
	DISBURSEMENTS TOTAL	\$6,961.91	\$6,834.46	\$9,113.69

	Disbursements	Seventh Monthly Application (October 1, 2024 through October 31, 2024)	Eighth Monthly Application (November 1, 2024 through November 30, 2024)	Ninth Monthly Application (December 1, 2024 through December 31, 2024)
a)	Filing/Court Fees Payable to Clerk of Court. (Admission Fees)	\$0.00	\$0.00	\$0.00
<b>b</b> )	Computer Assisted Legal Research Westlaw, Lexis and a description of manner calculated.	\$0.00	\$0.00	\$0.00
c)	Pacer Fees Payable to the Pacer Service Center for search and/or print.	\$0.00	\$0.00	\$0.00
d)	Fax (with rates) No. of Pages Rate per Page (Max. \$1.00/pg.)	\$0.00	\$0.00	\$0.00
e)	Case Specific Telephone / Conference Call Charges Exclusive of overhead charges. Court Appearances	\$0.00	\$0.00	\$0.00
f)	In-House Reproduction Services Exclusive of overhead charges.	\$0.00	\$0.00	\$0.00
g)	Outside Reproduction Services Including scanning services.	\$0.00	\$0.00	\$0.00
h)	Other Research Title searches, UCC searches, Asset searches, Accurint.	\$0.00	\$0.00	\$0.00
i)	Court Reporting / Deposition Services Transcripts.	\$0.00	\$0.00	\$0.00
j)	Travel Mileage, rolls, airfare and parking	\$8,725.94	\$6,614.12	\$4,340.00
k)	Courier & Express Carriers Overnight and personal delivery	\$0.00	\$0.00 \$0.00	
1)	Postage	\$0.00	\$0.00	\$0.00
m)	Other (specify) – Business Meals	\$1,211.94	\$499.23	\$509.57
n)	Other (specify) – Hotel	\$1,002.30	\$936.17	\$809.90
	DISBURSEMENTS TOTAL	\$10,940.18	\$8,049.52	\$5,659.47

	Disbursements	Tenth Monthly Application (January 1, 2025 through January 31, 2025)	Eleventh Monthly Application (February 1, 2025 through February 28, 2025)	Twelfth Monthly Application (March 1, 2025 through March 31, 2025)
a)	Filing/Court Fees Payable to Clerk of Court. (Admission Fees)	\$0.00	\$0.00	\$0.00
<b>b</b> )	Computer Assisted Legal Research Westlaw, Lexis and a description of manner calculated.	\$0.00	\$0.00	\$0.00
c)	Pacer Fees Payable to the Pacer Service Center for search and/or print.	\$0.00	\$0.00	\$0.00
d)	Fax (with rates) No. of Pages Rate per Page (Max. \$1.00/pg.)	\$0.00	\$0.00	\$0.00
<b>e</b> )	Case Specific Telephone / Conference Call Charges Exclusive of overhead charges. Court Appearances	\$0.00	\$0.00	\$0.00
f)	In-House Reproduction Services Exclusive of overhead charges.	\$0.00	\$0.00	\$0.00
g)	Outside Reproduction Services Including scanning services.	\$0.00	\$0.00	\$0.00
h)	Other Research Title searches, UCC searches, Asset searches, Accurint.	\$0.00	\$0.00	\$0.00
i)	Court Reporting / Deposition Services Transcripts.	\$0.00	\$0.00	\$0.00
j)	Travel Mileage, rolls, airfare and parking	\$1,454.96	\$0.00	\$0.00
k)	Courier & Express Carriers Overnight and personal delivery	\$0.00 \$0.00		\$0.00
1)	Postage	\$0.00	\$0.00	\$0.00
m)	Other (specify) – Business Meals	\$95.69	\$0.00	\$0.00
n)	Other (specify) – Hotel	\$356.96	\$0.00	\$0.00
	DISBURSEMENTS TOTAL	\$1,907.61	\$0.00	\$0.00

	Disbursements	Thirteenth Monthly Application (April 1, 2025 through April 30, 2025)	Fourteenth Monthly Application (May 1, 2025 through May 31, 2025)	Fifteenth Monthly Application (June 1, 2025 through June 30, 2025)
a)	Filing/Court Fees Payable to Clerk of Court. (Admission Fees)	\$0.00	\$0.00	\$0.00
<b>b</b> )	Computer Assisted Legal Research Westlaw, Lexis and a description of manner calculated.	\$0.00	\$0.00	\$0.00
c)	Pacer Fees Payable to the Pacer Service Center for search and/or print.	\$0.00	\$0.00	\$0.00
d)	Fax (with rates) No. of Pages Rate per Page (Max. \$1.00/pg.)	\$0.00	\$0.00	\$0.00
e)	Case Specific Telephone / Conference Call Charges Exclusive of overhead charges. Court Appearances	\$0.00	\$0.00	\$0.00
f)	In-House Reproduction Services Exclusive of overhead charges.	\$0.00	\$0.00	\$0.00
g)	Outside Reproduction Services Including scanning services.	\$0.00	\$0.00	\$0.00
h)	Other Research Title searches, UCC searches, Asset searches, Accurint.	\$0.00	\$0.00	\$0.00
i)	Court Reporting / Deposition Services Transcripts.	\$0.00	\$0.00	\$0.00
<b>j</b> )	Travel Mileage, rolls, airfare and parking	\$0.00	\$0.00	\$0.00
k)	Courier & Express Carriers Overnight and personal delivery	\$0.00	\$0.00	\$0.00
1)	Postage	\$0.00	\$0.00	\$0.00
m)	Other (specify) – Business Meals	\$0.00	\$0.00	\$0.00
n)	Other (specify) – Hotel	\$0.00	\$0.00	\$0.00
	DISBURSEMENTS TOTAL	\$0.00	\$0.00	\$0.00

	Disbursements	Total
a)	Filing/Court Fees Payable to Clerk of Court. (Admission Fees)	\$0.00
<b>b</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. Court Appearances	\$0.00
f)	<b>In-House Reproduction Services</b> Exclusive of overhead charges.	\$0.00
g)	Outside Reproduction Services Including scanning services.	\$0.00
h)	Other Research Title searches, UCC searches, Asset searches, Accurint.	\$0.00
i)	Court Reporting / Deposition Services Transcripts.	\$0.00
<b>j</b> )	<b>Travel</b> Mileage, rolls, airfare and parking	\$48,607.44
k)		\$0.00
1)	Postage	\$0.00
m)	Other (specify) – Business Meals	\$6,272.90
n)	Other (specify) – Hotel	\$14,232.02
	DISBURSEMENTS TOTAL	\$69,112.36

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

	Obj. Deadline: September 26, 2025 at 4:00 p.m. Hearing Date: October 8, 2025 at 11:00 a.m.
Debtors.	(Jointly Administered)
SC HEALTHCARE HOLDING, LLC, et al.,1	Case No. 24-10443 (TMH)
In re:	Chapter 11

NOTICE OF CONSOLIDATED FIFTH INTERIM FEE APPLICATION AND FINAL FEE APPLICATION OF SAK MANAGEMENT SERVICES, LLC D/B/A SAK HEALTHCARE, AS MEDICAL OPERATIONS ADVISOR TO THE PATIENT CARE OMBUDSMAN, FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD OF APRIL 16, 2024 THROUGH AUGUST 7, 2025

**PLEASE TAKE NOTICE** that on September 5, 2025, SAK Management Services, LLC d/b/a SAK Healthcare ("SAK"), medical operations advisor to Suzanne Koenig, the patient care ombudsman (the "Ombudsman"), pursuant to the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [D.I. 235] (the "Interim Compensation Order") filed its Consolidated July Monthly Fee Statement, August Monthly Fee Statement, Fifth Interim Fee Application, and Fee Application ("Application") seeking allowance of fees in the amount of \$1,055,837.50 and reimbursement of expenses in the amount of \$69,112.36 for the period of April 16, 2025 through June 30, 2025.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Interim Compensation Order, objections if any, to the Application summarized above, must be filed with the Court and served on the undersigned counsel at the address set forth below and the additional Notice Parties (as defined in the Interim Compensation Order) so as to be actually received on or before 4:00 p.m. (prevailing Eastern Time) on September 26, 2025:

<sup>&</sup>lt;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.

Cheryl A. Santaniello, Esq. (DE Bar No. 5062)

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Robert M. Schechter, Esq. (*pro hac vice*) Christopher P. Mazza, Esq. (*pro hac vice*) Porzio, Bromberg & Newman, P.C.

100 Southgate Parkway

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Morristown, New Jersey 07962 Telephone: (973) 538-4006 Facsimile: (973) 538-5146

E-mail: <a href="mailto:rmschechter@pbnlaw.com">rmschechter@pbnlaw.com</a>
E-mail: <a href="mailto:cpmazza@pbnlaw.com">cpmazza@pbnlaw.com</a>

If no objections to the Application are timely filed and received in accordance with such notice, the Court may enter an order granting the Application without a hearing.

**PLEASE TAKE FURTHER NOTICE** that a hearing to consider this Application will be held on <u>October 8, 2025 at 11:00 a.m.</u> before the Honorable Thomas M. Horan, Judge at the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 5th Floor, Courtroom #6, Wilmington, Delaware 19801.

Dated: September 5, 2025 /s/ Cheryl A. Santaniello

Cheryl A. Santaniello

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

	Obj. Deadline: September 26, 2025 at 4:00 p.m. Hearing Date: October 8, 2025 at 11 am
Debtors.	(Jointly Administered)
SC HEALTHCARE HOLDING, LLC, et al.,1	Case No. 24-10443 (TMH)
In re:	Chapter 11

DECLARATION OF SUZANNE KOENIG IN SUPPORT OF THE CONSOLIDATED FIFTH INTERIM FEE APPLICATION AND FINAL FEE APPLICATION OF SAK MANAGEMENT SERVICES, LLC D/B/A SAK HEALTHCARE, AS MEDICAL OPERATIONS ADVISOR TO THE PATIENT CARE OMBUDSMAN, FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD OF APRIL 16, 2024 THROUGH AUGUST 7 2025

- I, Suzanne Koenig, under penalty of perjury, declare as follows:
- 1. I am the Founder and Chief Executive Officer of SAK Management Services, LLC d/b/a SAK Healthcare ("SAK"), and am the Court appointed patient care ombudsman (the "Ombudsman").
- 2. I have read the foregoing Consolidated Fifth Interim Fee Application and Final Fee Application of SAK Management Services, LLC d/b/a SAK Healthcare, as Medical Operations Advisor to the Patient Care Ombudsman, for Allowance of Compensation and Reimbursement of Expenses for the Period of April 16, 2024 through June 30, 2025 and know the contents thereof. The same contents are true to the best of my knowledge, except as to matters therein alleged to be upon information and belief, and as to those matters, I believe them to be true. I have personally

<sup>&</sup>lt;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.

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performed many of the services rendered by SAK and am thoroughly familiar with all other work

performed on behalf of the Ombudsman by the professionals in SAK.

3. In accordance with Rule 2016(a) of the Federal Rules of Bankruptcy Procedure and

Section 504 of the Title 11, United States Code, no agreement or understanding exists between

SAK and any other person for the sharing of compensation to be received in connection with the

above-captioned case.

4. I have reviewed the requirements of Local Rule 2016-2 of the United States

Bankruptcy Court for the District of Delaware, and to the best of my knowledge, information and

belief, this Application complies with Local Rule 2016-2.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true

and correct to the best of my knowledge and belief.

Executed on September 5, 2025

/s/ Suzanne Koenig
Suzanne Koenig

2

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

In re:	Chapter 11		
SC HEALTHCARE HOLDING, LLC, et al.,1	Case No. 24-10443 (TMH)		
Debtors.	(Jointly Administered)		
	Obj. Deadline: September 26, 2025 at 4:00 p.m. Hearing Date: October 8, 2025 at 11:00 a.m.		
FEE APPLICATION OF SAK MANA HEALTHCARE, AS MEDICAL OPERAT OMBUDSMAN, FOR ALLOWANCE OF O	INTERIM FEE APPLICATION AND FINAL GEMENT SERVICES, LLC D/B/A SAK IONS ADVISOR TO THE PATIENT CARE COMPENSATION AND REIMBURSEMENT PRIL 16, 2024 THROUGH AUGUST 7, 2025		
Name of Applicant:	SAK Management Services, LLC d/b/a SAK Healthcare		
Authorized to Provide Professional Services as:	Suzanne Koenig, Patient Care Ombudsman		
Effective Date of Retention:	May 24, 2024 nunc pro tunc to April 16, 2024		
Period for Which Compensation and Reimbursement is Sought:	April 16, 2024 through August 7, 2025		
Amount of Compensation sought as actual, reasonable and necessary services rendered:	<u>\$1,055,837.50</u>		
Amount of Expense Reimbursement sought as actual, reasonable and necessary:	<u>\$69,112.36</u>		
This is a(n): monthly interim _	X final application		

<sup>&</sup>lt;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.

### Prior Applications:

Monthly Fee Application Filing Date & Docket No.	Period Covered	Total Fees Requested	Total Expenses Requested	CNO Filing Date & Docket No.	Amount of Fees Authorized to be Paid (80%)	Amount of Expenses Authorized to be Paid (100%)
June 6, 2024 [Dkt. No. 514]	April 16, 2024 through April 30, 2024	\$29,815.00	\$1,067.41	June 21, 2024 [Dkt. No. 549]	\$29,815.00	\$1,067.41
July 11, 2024 [Dkt. No. 659]	May 1, 2024 through May 31, 2024	\$74,030.00	\$7,440.76	July 25, 2024 [Dkt. No. 717]	\$74,030.00	\$7,440.76
August 9, 2024 [Dkt. No. 744]	June 1, 2024 through June 30, 2024	\$174,680.00	\$11,137.35	August 26, 2024 [Dkt. No. 787]	\$174,680.00	\$11,137.35
September 16, 2024 [Dkt. No. 835]	July 1, 2024 through July 31, 2024	\$121,335.00	\$6,961.91	October 9, 2024 [Dkt. No. 902]	\$121,335.00	\$6,961.91
October 28, 2024 [Dkt. No. 951]	August 1, 2024 through August 31, 2024	\$139,780.00	\$6,834.46	November 13, 2024 [Dkt. No. 998]	\$139,780.00	\$6,834.46
October 31, 2024 [Dkt. No. 965]	September 1, 2024 through September 30, 2024	\$122,985.00	\$9,113.69	November 15, 2024 [Dkt. No. 1018]	\$122,985.00	\$9,113.69
December 20, 2024 [Dkt. No. 1110]	October 1, 2024 through October 31, 2024	\$136,515.00	\$10,940.18	January 6, 2025 [Dkt. No. 1158]	\$136,515.00	\$10,940.18
December 27, 2024 [Dkt. No. 1130]	November 1, 2024 through November 30, 2024	\$109,875.00	\$8,049.52	January 14, 2025 [Dkt. No. 1186]	\$109,875.00	\$8,049.52
February 11, 2025 [Dkt. No. 1252]	December 1, 2024 through December 31, 2024	\$79,645.00	\$5,659.47	February 27, 2025 [Dkt. No. 1294]	\$79,645.00	\$5,659.47

Monthly Fee Application Filing Date & Docket No.	Period Covered	Total Fees Requested	Total Expenses Requested	CNO Filing Date & Docket No.	Amount of Fees Authorized to be Paid (80%)	Amount of Expenses Authorized to be Paid (100%)
March 17, 2025 [Dkt. No. 1342]	January 1, 2025 through January 31, 2025	\$45,627.50	\$1,907.61	April 2, 2025 [Dkt. No. 1374]	\$45,627.50	\$1,907.61
April 11, 2025 [Dkt. No. 1384]	February 1, 2025 through February 28, 2025	\$14,882.50	\$0.00	May 7, 2025 [Dkt. No. 1557]	\$14,882.50	\$0.00
May 14, 2025 [Dkt. No. 1571]	March 1, 2025 through March 31, 2025	\$3,517.50	\$0.00	June 23, 2025 [Dkt. No. 1705]	\$3,517.50	\$0.00
May 14, 2025 [Dkt. No. 1573]	April 1, 2025 through April 30, 2025	\$2,362.50	\$0.00	June 23, 2025 [Dkt. No. 1707]	\$1,890.00	\$0.00
July 29, 2025 [Dkt. No. 1742]	May 1, 2025 through May 31, 2025	\$682.50	\$0.00	August 13, 2025 [Dkt. No. 1765]	\$546.00	\$0.00
August 15, 2025 [Dkt. No. 1768]	June 1, 2025 through June 30, 2025	\$105.00	\$0.00	N/A	N/A	N/A
TOTA	LS:	\$1,055,837.50	\$69,112.36		\$1,055,123.50	\$69,112.36

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

In re:	Chapter 11
SC HEALTHCARE HOLDING, LLC, et al.,1	Case No. 24-10443 (TMH)
Debtors.	(Jointly Administered)

### **CERTIFICATE OF SERVICE**

I hereby certify that on this 5<sup>th</sup> day of September, 2025, I caused to be filed with the Court electronically, and I caused to be served a true and correct copy of the *Consolidated Fifth Interim Fee Application and Final Fee Application of SAK Management Services, LLC D/B/A SAK Healthcare, as Medical Operations Advisor to the Patient Care Ombudsman, for Allowance of Compensation and Reimbursement of Expenses for the Period of April 16, 2024 Through June 30, 2025* (the "Application") 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** and the notice of hearing on the Application was completed by U.S. First Class on the parties listed on **Exhibit B**.

/s/ Cheryl A. Santaniello
Cheryl A. Santaniello

<sup>&</sup>lt;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.

### **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

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

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

Counsel to Column Financial, Inc.

Norton Rose Fulbright US LLP Attn: Robert M. Hirsh, Emily Hong 1301 Avenue of the Americas New York, NY 10019

Counsel to DIP Lender

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Counsel to Column Financial, Inc.

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Debtors' Counsel

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Counsel to DIP Lender

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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