Docket #0254 Date Filed: 10/20/2026

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: PACIFICA OF THE VALLEY CORP.,[1] Debtor.	Chapter 11 Case No. 26-11060 (TMH) **Re: Docket No. 234**

AXIOS CAPITAL SOLUTIONS, LLC'S RESERVATION OF RIGHTS REGARDING DEBTOR'S MOTION FOR ENTRY OF AN ORDER (I) EXTENDING TIME TO ASSUME OR REJECT DEBTOR'S LEASES OF NONRESIDENTIAL REAL PROPERTY PURSUANT TO SECTION 365(d)(4) AND (II) GRANTING RELATED RELIEF

Axios Capital Solutions, LLC ("**Axios**"), through its undersigned counsel, submits this *Reservation of Rights* (this "**Reservation of Rights**") regarding the above-captioned debtor's (the "**Debtor**" or **"Pacifica"**) *Motion for Entry of an Order (I) Extending the Time to Assume or Reject Debtor's Leases of Nonresidential Real Property Pursuant to Section 365(d)(4) and (II) Granting Related Relief* [D.I. 234] (the "**Motion**") and respectfully states as follows:[2]

1. Axios has no objection to the Motion or to entry of an order granting the relief sought in the Motion without a hearing. However, while the Motion properly notes that the treatment of the Lease remains subject to ongoing negotiations among the Debtor, Axios and the Landlord Entities, and the requested extension is intended to preserve the status quo, the Motion fails to expressly note that the Lease remains subject to a potential claim for recharacterization, as

[1] The Debtor in this Chapter 11 Case, along with the last four digits of the Debtor's federal tax identification number, is: Pacifica of the Valley Corporation d/b/a Pacifica Hospital of the Valley [7312]. The Debtor's mailing address is 9449 San Fernando Road, Sun Valley, CA 91352.

[2] The Debtor extended the time for Axios to respond to the Motion to October 20, 2026. All capitalized terms used but not defined herein have the meanings ascribed to such terms in the Motion.

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the record of this case reflects. Accordingly, Axios is filing this Reservation of Rights solely in an abundance of caution to reserve all rights regarding the potential recharacterization of the Lease.

RAINES FELDMAN LITTRELL LLP

Dated: October 20, 2026
Wilmington, Delaware

/s/ Matthew P. Milana

Thomas J. Francella, Jr. (No. 3835)
Matthew P. Milana (No. 6681)
824 North Market Street, Suite 805
Wilmington, DE 19801
Telephone: (302) 772-5803
Email: tfrancella@raineslaw.com
mmilana@raineslaw.com

and

Hamid R. Rafatjoo, Esquire (*pro hac vice*)
Raines Feldman Littrell LLP
4675 MacArthur Ct., Suite 1550
Newport Beach, CA 92660
hrafatjoo@raineslaw.com

and

Carollynn H.G. Callari, Esquire (*pro hac vice)*
Raines Feldman Littrell LLP
1350 Avenue of the Americas, 22nd Floor
New York, NY 10019
ccallari@raineslaw.com

Counsel to Axios Capital Solutions, LLC