Docket #0307 Date Filed: 11/12/2026

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
PACIFICA OF THE VALLEY CORPORATION,[1]	Case No. 26-11060 (TMH)
Debtor.	Re: D.I. 276, 278, 280, 290, 296, 300 and 301

NOTICE OF WITHDRAWAL OF LIMITED OBJECTION AND RESERVATION OF RIGHTS OF SEIU LOCAL 121RN *[D.I. 290]* TO (I) CONDITIONAL APPROVAL OF THE COMBINED DISCLOSURE STATEMENT AND CHAPTER 11 PLAN OF LIQUIDATION OF PACIFICA OF THE VALLEY CORPORATION AND (II) THE DEBTOR'S PROCEDURES MOTION *[D.I. 278]*

SEIU Local 121RN (the "Union"), through its undersigned counsel, withdraws the objections stated in its *Limited Objection and Reservation of Rights of SEIU Local 121RN to (I) Conditional Approval of the Combined Disclosure Statement and Chapter 11 Plan of Liquidation of Pacifica of the Valley Corporation and (II) the Debtor's Procedures Motion [D.I. 290]*, filed November 6, 2026 (the "Limited Objection"), to conditional approval of the disclosure statement and the other relief requested in the Debtor's Procedures Motion *[D.I. 278]*. That relief was set for hearing on **November 10, 2026 at 3:00 p.m. (ET)**, and objections were due by **November 6, 2026 at 4:00 p.m. (ET)**. *[D.I. 280 ¶¶ 2–3.]* The hearing was cancelled. *[D.I. 301.]* The Union does not withdraw the reservation of rights in the Limited Objection, which is restated and supplemented below.[2]

[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 (7312). The Debtor's mailing address is 9449 San Fernando Road, Sun Valley, CA 91352.

[2] The CM/ECF docket text for D.I. 290 reads "Omnibus Objection to Claims Filed by SIEU United Healthcare Workers-West." D.I. 290 is the Union's Limited Objection described in this Notice. It is not an objection to any claim, and it was not filed by or on behalf of SEIU-United Healthcare Workers West. The Union requests that the docket text be corrected accordingly.

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The Union withdraws based on the Debtor's representation that the buyer confirmed that the Union's collective bargaining agreement (the "CBA") will be assumed and assigned in connection with the proposed Axios sale. *[D.I. 296 ¶ 17.]* The revised Combined Disclosure Statement and Chapter 11 Plan of Liquidation describes the proposed CBA assumption in § 5.8 and expressly excludes the CBAs from deemed rejection in § 14.1. *[D.I. 296-1 §§ 1, 5.8, 14.1; D.I. 300-3 §§ 1, 5.8, 14.1.]* Consistent with the Debtor's Certification of Counsel, the Union does not object to entry of the proposed order attached to it as Exhibit A. As stated there, "[a]ll parties' rights are reserved with respect to confirmation of the Debtor's chapter 11 plan." *[D.I. 300 ¶ 10.]*

The Union reserves all its rights, claims, defenses and remedies, including the right to object to final approval of the disclosure statement, plan confirmation, the proposed sale, and any proposed assumption, assignment, cure, rejection or modification of the CBA, including under 11 U.S.C. § 1113 and in response to any assumption notice. This reservation also extends to any release, exculpation or injunction, or any determination of successor obligations, affecting the Union or the employees it represents; to the Union's claims, including claims for unremitted dues; and to any material change in the CBA's treatment. Nothing in this Notice is an admission, a waiver, or consent to any release of the Union or the employees it represents. This reservation applies to the extent permitted by applicable law and the Court's orders and deadlines.

Dated: November 10, 2026

THE MYERS LAW GROUP, APC

/s/ Ann Hendrix
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Counsel for SEIU Local 121RN

CERTIFICATE OF SERVICE

I certify that on November 10, 2026, I caused the foregoing *Notice of Withdrawal of Limited Objection and Reservation of Rights of SEIU Local 121RN [D.I. 290]* to be served through the Court's CM/ECF system on the recipients identified in the Notice of Electronic Filing. On November 10, 2026, I also caused courtesy copies to be sent by email to:

(i) the Debtor, c/o Berkeley Research Group, LLC, Attn: Peter Chadwick (pchadwick@thinkbrg.com);

(ii) counsel to the Debtor, Dentons US LLP, Attn: Tania M. Moyron (tania.moyron@dentons.com), Samuel R. Maizel (samuel.maizel@dentons.com), John D. Beck (john.beck@dentons.com), Samantha Siegien (samantha.siegien@dentons.com), Henry Thomas (henry.thomas@dentons.com), and Geoffrey Miller (geoffrey.miller@dentons.com);

(iii) counsel to the Debtor, Pachulski Stang Ziehl & Jones LLP, Attn: Laura Davis Jones (ljones@pszjlaw.com), Timothy P. Cairns (tcairns@pszjlaw.com), and Edward A. Corma (ecorma@pszjlaw.com);

(iv) the Office of the United States Trustee, Attn: Hannah J. McCollum (hannah.mccollum@usdoj.gov);

(v) counsel to the Official Committee of Unsecured Creditors, Sills Cummis & Gross P.C., Attn: Andrew H. Sherman (asherman@sillscummis.com) and Boris I. Mankovetskiy (bmankovetskiy@sillscummis.com), and Ice Miller LLP, Attn: Christopher M. Samis (christopher.samis@icemiller.com) and Aaron H. Stulman (aaron.stulman@icemiller.com); and

(vi) counsel to Axios, Raines Feldman Littrell LLP, Attn: Thomas J. Francella, Jr. (tfrancella@raineslaw.com) and Matthew P. Milana (mmilana@raineslaw.com).

/s/ Ann Hendrix
Ann Hendrix
Attorney at Law