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

In re:	Chapter 11
SC HEALTHCARE HOLDING, LLC,	Case No. 24-10443 (TMH)
Debtor.	
In re:	Chapter 11
ALEDO HCO, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
ALEDO RE, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
ARCOLA HCO, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
ARCOLA RE, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
ASPEN HCO, LLC,	Case No. 24()
Debtor.	

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In re:	Chapter 11
BUSHNELL AL RE, LLC,	Case No. 24 ()
Debtor.	
In re:	Chapter 11
CASEY HCO, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
COLLINSVILLE HCO, LLC,	Case No. 24()
Debtor.	
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CYE BRADFORD HCO, LLC,	Case No. 24 ()
Debtor.	
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CYE BUSHNELL HCO, LLC,	Case No. 24 ()
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CYE GIRARD HCO, LLC,	Case No. 24()
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Debtor.	
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CYE WALCOTT HCO, LLC,	Case No. 24()
Debtor.	
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CYV KEWANEE AL RE, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
DECATUR HCO, LLC,	Case No. 24()
Debtor.	
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DECATUR RE, LLC,	Case No. 24()
Debtor.	

In re: EASTVIEW HCO, LLC, Debtor.	Chapter 11  Case No. 24()
In re: EASTVIEW RE, LLC, Debtor.	Chapter 11  Case No. 24()
In re:  EFFINGHAM HCO, LLC,  Debtor.	Chapter 11  Case No. 24()
In re:  EFFINGHAM RE, LLC,  Debtor.	Chapter 11  Case No. 24()
In re: HAVANA HCO, LLC, Debtor.	Chapter 11  Case No. 24()
In re: HAVANA RE, LLC, Debtor.	Chapter 11  Case No. 24()

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In re:	Chapter 11
JONESBORO, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
KEWANEE HCO, LLC,	Case No. 24()
Debtor.	
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KEWANEE, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
KNOXVILLE & PENNSYLVANIA, LLC,	Case No. 24()
Debtor.	
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MCLEANSBORO HCO, LLC,	Case No. 24 ()
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MIDWEST HEALTH PROPERTIES, LLC,	Case No. 24 ()
Debtor.	

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In re:	Chapter 11
NORTH AURORA HCO, LLC,	Case No. 24 ()
Debtor.	
In re:	Chapter 11
NORTH AURORA, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
PETERSEN 23, LLC	Case No. 24()
Debtor.	
In re:	Chapter 11
PETERSEN 25, LLC,	Case No. 24()
Debtor.	
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PETERSEN 26, LLC,	Case No. 24 ()
Debtor.	
In re:	Chapter 11
PETERSEN 27, LLC,	Case No. 24 ()
Debtor.	

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In re:	Chapter 11
PETERSEN 29, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
PETERSEN 30, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
PETERSEN FARMER CITY, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
PETERSEN HEALTH & WELLNESS, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
PETERSEN HEALTH BUSINESS, LLC,	Case No. 24 ()
Debtor.	
In re:	Chapter 11
PETERSEN HEALTH CARE - FARMER CITY, LLC,	Case No. 24()
Debtor.	

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In re:	Chapter 11
PETERSEN HEALTH CARE - ILLINI, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
PETERSEN HEALTH CARE - ROSEVILLE, LLC,	Case No. 24 ()
Debtor.	
In re:	Chapter 11
PETERSEN HEALTH CARE II, INC.,	Case No. 24()
Debtor.	
In re:	Chapter 11
PETERSEN HEALTH CARE III, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
PETERSEN HEALTH CARE MANAGEMENT, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
PETERSEN HEALTH CARE V, LLC,	Case No. 24()
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In re:	Chapter 11
PETERSEN HEALTH CARE VII, LLC,	Case No. 24 ()
Debtor.	
In re:	Chapter 11
PETERSEN HEALTH CARE VIII, LLC,	Case No. 24()
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PETERSEN HEALTH CARE X, LLC,	Case No. 24()
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PETERSEN HEALTH CARE XI, LLC,	Case No. 24()
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PETERSEN HEALTH CARE XIII, LLC,	Case No. 24()
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PETERSEN HEALTH CARE, INC.,	Case No. 24()
Debtor.	

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PETERSEN HEALTH ENTERPRISES, LLC,	Case No. 24()
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PETERSEN HEALTH GROUP, LLC,	Case No. 24()
Debtor.	
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PETERSEN HEALTH NETWORK, LLC,	Case No. 24()
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PETERSEN HEALTH PROPERTIES, LLC,	Case No. 24()
Debtor.	
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PETERSEN HEALTH QUALITY, LLC,	Case No. 24()
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PETERSEN HEALTH SYSTEMS, INC.,	Case No. 24()
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PETERSEN MT, LLC,	Case No. 24()
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PETERSEN MT3, LLC,	Case No. 24 ()
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PETERSEN MT4, LLC,	Case No. 24()
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PETERSEN ROSEVILLE, LLC,	Case No. 24()
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PIPER HCO, LLC,	Case No. 24 ()
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PIPER RE, LLC,	Case No. 24 ()
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PLEASANT VIEW HCO, LLC,	Case No. 24()
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PLEASANT VIEW RE, LLC,	Case No. 24()
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In re:	Chapter 11
PRAIRIE CITY HCO, LLC,	Case No. 24()
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PRAIRIE CITY RE, LLC,	Case No. 24()
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ROBINGS HCO, LLC,	Case No. 24()
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ROBINGS, LLC,	Case No. 24 ()
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ROSICLARE HCO, LLC,	Case No. 24()
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ROSICLARE RE, LLC,	Case No. 24()
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ROYAL HCO, LLC,	Case No. 24()
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ROYAL RE, LLC,	Case No. 24()
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SABL, LLC,	Case No. 24()
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SHANGRI LA HCO, LLC,	Case No. 24()
Debtor.	
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SHANGRI LA RE, LLC,	Case No. 24()
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SHELBYVILLE HCO, LLC,	Case No. 24()
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SHELBYVILLE RE, LLC,	Case No. 24()
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SJL HEALTH SYSTEMS, INC.,	Case No. 24()
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SOUTH ELGIN, LLC,	Case No. 24()
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In re:	Chapter 11
SULLIVAN AL RE, LLC,	Case No. 24 ()
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SULLIVAN HCO, LLC,	Case No. 24()
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SULLIVAN RE, LLC,	Case No. 24()
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SWANSEA HCO, LLC,	Case No. 24()
Debtor.	
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SWANSEA RE, LLC,	Case No. 24()
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TARKIO HCO, LLC,	Case No. 24()
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TARKIO RE, LLC,	Case No. 24()
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TUSCOLA HCO, LLC,	Case No. 24()
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TUSCOLA RE, LLC,	Case No. 24()
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TWIN HCO, LLC,	Case No. 24()
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TWIN RE, LLC,	Case No. 24()
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VANDALIA HCO, LLC,	Case No. 24()
Debtor.	

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VANDALIA RE, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
VILLAGE KEWANEE HCO, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
WALCOTT AL RE, LLC,	Case No. 24()
Debtor.	
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WAR DRIVE, LLC,	Case No. 24()
Debtor.	
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WATSEKA HCO, LLC,	Case No. 24()
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WATSEKA RE, LLC,	Case No. 24()
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In re:	Chapter 11
WESTSIDE HCO, LLC,	Case No. 24()
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WESTSIDE RE, LLC,	Case No. 24()
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XCH, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
CYE KEWANEE HCO, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
CYE KEWANEE- PHC, INC.,	Case No. 24()
Debtor.	
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CYE KNOXVILLE - PHC, INC,	Case No. 24()
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In re:	Chapter 11
CYE KNOXVILLE HCO, LLC,	Case No. 24 ()
Debtor.	
In re:	Chapter 11
CYE MONMOUTH - PHC, INC,	Case No. 24()
Debtor.	
In re:	Chapter 11
CYE MONMOUTH HCO, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
EL PASO - PHC, INC,	Case No. 24()
Debtor.	
In re:	Chapter 11
EL PASO HCC, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
EL PASO HCO, LLC,	Case No. 24 ()
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In re:	Chapter 11
FLANAGAN - PHC, INC.,	Case No. 24()
Debtor.	
In re:	Chapter 11
FLANAGAN HCC, LLC,	Case No. 24()
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FLANAGAN HCO, LLC,	Case No. 24()
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KEWANEE AL, LLC,	Case No. 24()
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KNOXVILLE AL, LLC,	Case No. 24()
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LEGACY - PHC INC.,	Case No. 24()
Debtor.	

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In re:	Chapter 11
LEGACY ESTATES AL, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
LEGACY HCO, LLC,	Case No. 24()
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MARIGOLD - PHC INC.,	Case No. 24()
Debtor.	
In re:	Chapter 11
MARIGOLD HCC, LLC,	Case No. 24()
Debtor.	
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MARIGOLD HCO, LLC,	Case No. 24()
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MONMOUTH AL, LLC,	Case No. 24()
Debtor.	

In re:	Chapter 11
POLO - PHC, INC.,	Case No. 24 ()
Debtor.	
In re:	Chapter 11
POLO HCO, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
POLO, LLC,	Case No. 24()
Debtor.	

# DEBTORS' MOTION FOR ENTRY OF AN ORDER, PURSUANT TO BANKRUPTCY RULE 1015 AND LOCAL RULE 1015-1, (I) DIRECTING JOINT ADMINISTRATION OF THEIR RELATED CHAPTER 11 CASES AND (II) GRANTING RELATED RELIEF

The above-captioned debtors and debtors in possession (each, a "<u>Debtor</u>" and, collectively, the "<u>Debtors</u>") seek entry of an order, substantially in the form attached hereto as <u>Exhibit A</u> (the "<u>Proposed Order</u>"): (i) authorizing and directing the joint administration of the Debtors' chapter 11 cases (the "<u>Chapter 11 Cases</u>") and the consolidation thereof for procedural purposes only and (ii) granting certain related relief. In support of this motion (this "<u>Motion</u>"), the Debtors rely upon and incorporate by reference the *Declaration of David R. Campbell in Support of Chapter 11 Petitions and First Day Pleadings* (the "<u>First Day Declaration</u>"), <sup>1</sup> filed contemporaneously herewith. In further support of this Motion, the Debtors respectfully state as follows:

Capitalized terms used but not otherwise defined herein have the meaning given to such terms in the First Day Declaration.

#### **JURISDICTION AND VENUE**

- 1. The United States Bankruptcy Court for the District of Delaware (the "Court") has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference from the United States District Court for the District of Delaware*, dated February 29, 2012. The Debtors confirm their consent, pursuant to Rule 9013-1(f) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the "Local Rules"), to the entry of a final order by the Court in connection with this Motion to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.
- 2. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.
- 3. The bases for the relief requested herein are sections 105(a) and 342(c)(1) of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the "Bankruptcy Code"), Rules 1005, 1015, and 2002 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and Local Rule 1015-1.

#### **BACKGROUND**

4. On the date hereof (the "Petition Date"), each Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. The Debtors comprise one of the largest nursing home operators in the United States and work in partnership with physicians, skilled nurses, and other health care providers in order to provide various healthcare and rehabilitation services for elderly citizens in Illinois, Missouri, and Iowa. Among other services, the Debtors provide assisted and supportive living, skilled nursing care, respite care, memory care, hospice, local medical

transportation, radiology, and pharmacy services. A detailed description of the Debtors and their businesses, including the facts and circumstances giving rise to these Chapter 11 Cases is set forth in the First Day Declaration.

5. The Debtors are operating their businesses and managing their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. To date, the Office of the United States Trustee for the District of Delaware (the "<u>U.S. Trustee</u>") has not appointed an official committee in these Chapter 11 Cases and no request has been made for the appointment of a trustee or an examiner.

#### **RELIEF REQUESTED**

- 6. By this Motion, the Debtors seek entry of the Proposed Order: (i) directing procedural consolidation and joint administration of these Chapter 11 Cases and (ii) granting related relief.
- 7. The Debtors request that one docket be maintained for these Chapter 11 Cases under the case of SC Healthcare Holding, LLC, and that the Chapter 11 Cases be administered under a consolidated caption, as follows:

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

In re

SC HEALTHCARE HOLDING, LLC et al.,

Debtors.1

Chapter 11

Case No. 24-10443 (TMH)

(Jointly Administered)

<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, for which the Debtors have requested joint administration, 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 will be made available on a website of the Debtors' proposed claims and noticing agent at www.kccllc.net/Petersen.

- 8. The Debtors further request that the Court order that the foregoing caption satisfies the requirements set forth in section 342(c)(1) of the Bankruptcy Code.
- 9. The Debtors also request that a docket entry, substantially similar to the following, be entered on the docket in each of the Chapter 11 Cases (other than the Chapter 11 Case of SC Healthcare Holding, LLC) to reflect the joint administration of the Chapter 11 Cases:

An order has been entered in this case consolidating this case with the case of SC Healthcare Holding, LLC (Case No. 24-10443 (TMH)) for procedural purposes only and providing for its joint administration in accordance with the terms hereof. The docket in Case No. 24-10443 should be consulted for all matters concerning this case.

#### **BASIS FOR RELIEF**

- 10. Bankruptcy Rule 1015(b) provides that if two or more petitions are pending in the same court by or against a debtor and an affiliate, the court may order joint administration of the estates of the debtor and such affiliate. *See* Fed. R. Bankr. P. 1015(b). Local Rule 1015-1 similarly provides for joint administration of chapter 11 cases when the facts demonstrate that joint administration "is warranted and will ease the administrative burden for the Court and the parties." Del. Bankr. L.R. 1015-1.
- 11. As set forth in the First Day Declaration, the Debtors are comprised of approximately 170 privately held entities which the Debtors and their non-Debtor affiliates (together with the Debtors, the "Company") use to manage their operations and real estate business segments. The entities comprising the Company are directly or indirectly owned by Mark Petersen. Accordingly, all of the Debtors are "affiliates" as that term is defined in section 101(2) of the Bankruptcy Code. Thus, joint administration of the Chapter 11 Cases is appropriate under Bankruptcy Rule 1015(b) and Local Rule 1015-1.

- 12. The joint administration of the Chapter 11 Cases will permit the Clerk of the Court to use a single general docket for each of the Debtors' cases and to combine notices to creditors and other parties in interest of the Debtors' respective estates.
- 13. Many, if not virtually all, of the motions, applications, hearings, and orders that will arise in these Chapter 11 Cases will jointly affect all of the Debtors. To that end, joint administration is in the best interests of the Debtors' estates because it will avoid duplicative and potentially confusing filings by permitting all parties in interest to (i) use a single caption on the numerous documents that will be served and filed herein and (ii) file papers in one case rather than in multiple cases. Joint administration will also ease the burden on the U.S. Trustee in supervising these Chapter 11 Cases. To optimally and economically administer the Chapter 11 Cases, the Debtors believe that such cases should be jointly administered, for procedural purposes only, under the case caption reflected above.
- 14. The rights of the respective creditors of each of the Debtors will not be adversely affected by joint administration of the Chapter 11 Cases because the relief sought is purely procedural and in no way is intended to affect any substantive rights.
- 15. For these reasons, the Debtors submit that the relief requested herein is in the best interest of the Debtors, their estates, and all stakeholders, and therefore should be granted.

#### **NOTICE**

16. Notice of this Motion has been given to the following parties or, in lieu thereof, to their counsel, if known: (a) the U.S. Trustee; (b) the holders of the forty (40) largest unsecured claims against the Debtors (on a consolidated basis); (c) the office of the attorney general for each of the states in which the Debtors operate; (d) United States Attorney's Office for the District of Delaware; (e) the Internal Revenue Service; (f) the United States Department of Justice; (g) the

Prepetition Lenders; (h) the DIP Lender; (i) any party that has requested notice pursuant to Bankruptcy Rule 2002. Notice of this Motion and any order entered hereon will be served in accordance with Local Rule 9013-1(m). The Debtors submit that, in light of the nature of the relief requested, no other or further notice need be given.

[Remainder of page intentionally left blank]

WHEREFORE, the Debtors respectfully request that the Court grant the relief requested herein and such other and further relief as the Court deems appropriate under the circumstances.

Dated: March 20, 2024 Wilmington, Delaware Respectfully submitted,

### YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Shella Borovinskaya

Andrew L. Magaziner (No. 5426) Shella Borovinskaya (No. 6758)

Carol E. Cox (No. 6936)

Rodney Square

1000 North King Street

Wilmington, Delaware 19801 Telephone: (302) 571-6600

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#### WINSTON & STRAWN LLP

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200 Park Avenue

New York, New York 10166 Telephone: (212) 294-6700 Facsimile: (212) 294-4700

Email: chardman@winston.com

Proposed Counsel for the Debtors and

Debtors in Possession

### Exhibit A

**Proposed Order** 

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

In re:	Chapter 11
SC HEALTHCARE HOLDING, LLC,	Case No. 24-10443 (TMH)
Debtor.	
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LEBANON HCO, LLC,	Case No. 24()
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MACOMB, LLC,	Case No. 24()
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MIDWEST HEALTH PROPERTIES, LLC,	Case No. 24()
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PETERSEN 23, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
PETERSEN 25, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
PETERSEN 26, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
PETERSEN 27, LLC,	Case No. 24 ()
Debtor.	

In re:	Chapter 11
PETERSEN 29, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
PETERSEN 30, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
PETERSEN FARMER CITY, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
PETERSEN HEALTH & WELLNESS, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
PETERSEN HEALTH BUSINESS, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
PETERSEN HEALTH CARE - FARMER CITY, LLC,	Case No. 24()
Debtor.	

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In re:	Chapter 11
PETERSEN HEALTH CARE - ILLINI, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
PETERSEN HEALTH CARE - ROSEVILLE, LLC,	Case No. 24 ()
Debtor.	
In re:	Chapter 11
PETERSEN HEALTH CARE II, INC.,	Case No. 24()
Debtor.	
In re:	Chapter 11
PETERSEN HEALTH CARE III, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
PETERSEN HEALTH CARE MANAGEMENT, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
PETERSEN HEALTH CARE V, LLC,	Case No. 24()
Debtor.	

	7
In re:	Chapter 11
PETERSEN HEALTH CARE VII, LLC,	Case No. 24 ()
Debtor.	
In re:	Chapter 11
PETERSEN HEALTH CARE VIII, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
PETERSEN HEALTH CARE X, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
PETERSEN HEALTH CARE XI, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
PETERSEN HEALTH CARE XIII, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
PETERSEN HEALTH CARE, INC.,	Case No. 24()
Debtor.	

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In re:	Chapter 11
PETERSEN HEALTH ENTERPRISES, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
PETERSEN HEALTH GROUP, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
PETERSEN HEALTH NETWORK, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
PETERSEN HEALTH PROPERTIES, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
PETERSEN HEALTH QUALITY, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
PETERSEN HEALTH SYSTEMS, INC.,	Case No. 24()
Debtor.	

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In re:	Chapter 11
PETERSEN MANAGEMENT COMPANY, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
PETERSEN MT, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
PETERSEN MT3, LLC,	Case No. 24 ()
Debtor.	
In re:	Chapter 11
PETERSEN MT4, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
PETERSEN ROSEVILLE, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
PIPER HCO, LLC,	Case No. 24 ()
Debtor.	

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In re:	Chapter 11
PIPER RE, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
PLEASANT VIEW HCO, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
PLEASANT VIEW RE, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
PRAIRIE CITY HCO, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
PRAIRIE CITY RE, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
ROBINGS HCO, LLC,	Case No. 24()
Debtor.	

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In re:	Chapter 11
ROBINGS, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
ROSICLARE HCO, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
ROSICLARE RE, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
ROYAL HCO, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
ROYAL RE, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
SABL, LLC,	Case No. 24()
Debtor.	

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In re:	Chapter 11
SHANGRI LA HCO, LLC,	Case No. 24 ()
Debtor.	
In re:	Chapter 11
SHANGRI LA RE, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
SHELBYVILLE HCO, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
SHELBYVILLE RE, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
SJL HEALTH SYSTEMS, INC.,	Case No. 24()
Debtor.	
In re:	Chapter 11
SOUTH ELGIN, LLC,	Case No. 24()
Debtor.	

In re:	Chapter 11
SULLIVAN AL RE, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
SULLIVAN HCO, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
SULLIVAN RE, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
SWANSEA HCO, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
SWANSEA RE, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
TARKIO HCO, LLC,	Case No. 24()
Debtor.	

In re:	Chapter 11
TARKIO RE, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
TUSCOLA HCO, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
TUSCOLA RE, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
TWIN HCO, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
TWIN RE, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
VANDALIA HCO, LLC,	Case No. 24()
Debtor.	

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In re:	Chapter 11
VANDALIA RE, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
VILLAGE KEWANEE HCO, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
WALCOTT AL RE, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
WAR DRIVE, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
WATSEKA HCO, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
WATSEKA RE, LLC,	Case No. 24()
Debtor.	

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In re:	Chapter 11
WESTSIDE HCO, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
WESTSIDE RE, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
XCH, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
CYE KEWANEE HCO, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
CYE KEWANEE- PHC, INC.,	Case No. 24()
Debtor.	
In re:	Chapter 11
CYE KNOXVILLE - PHC, INC,	Case No. 24()
Debtor.	

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In re:	Chapter 11
CYE KNOXVILLE HCO, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
CYE MONMOUTH - PHC, INC,	Case No. 24()
Debtor.	
In re:	Chapter 11
CYE MONMOUTH HCO, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
EL PASO - PHC, INC,	Case No. 24()
Debtor.	
In re:	Chapter 11
EL PASO HCC, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
EL PASO HCO, LLC,	Case No. 24()
Debtor.	

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In re:	Chapter 11
FLANAGAN - PHC, INC.,	Case No. 24 ()
Debtor.	
In re:	Chapter 11
FLANAGAN HCC, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
FLANAGAN HCO, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
KEWANEE AL, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
KNOXVILLE AL, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
LEGACY - PHC INC.,	Case No. 24()
Debtor.	

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In re:	Chapter 11
LEGACY ESTATES AL, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
LEGACY HCO, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
MARIGOLD - PHC INC.,	Case No. 24()
Debtor.	
In re:	Chapter 11
MARIGOLD HCC, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
MARIGOLD HCO, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
MONMOUTH AL, LLC,	Case No. 24()
Debtor.	

In re:	Chapter 11
POLO - PHC, INC.,	Case No. 24()
Debtor.	
In re:	Chapter 11
POLO HCO, LLC,	Case No. 24()
Debtor.	
In re:	Chapter 11
POLO, LLC,	Case No. 24()
Debtor.	

## ORDER, PURSUANT TO BANKRUPTCY RULE 1015 AND LOCAL RULE 1015-1, (I) DIRECTING JOINT ADMINISTRATION OF THE DEBTORS' CHAPTER 11 CASES, (II) MODIFYING THE REQUIREMENTS FOR FILING MONTHLY OPERATING REPORTS, AND (III) GRANTING RELATED RELIEF

Upon the motion (the "Motion")<sup>1</sup> of the above-captioned debtors and debtors in possession (each, a "Debtor" and collectively, the "Debtors") for entry of an order (this "Order"): (i) directing procedural consolidation and joint administration of the Debtors' related chapter 11 cases and (ii) granting related relief, all as more fully set forth in the Motion; and upon the First Day Declaration; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the Amended Standing Order of Reference from the United States District Court for the District of Delaware, dated February 29, 2012; and that this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this

Capitalized terms used but not otherwise defined herein shall have the same meaning as ascribed to them in the Motion.

proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the Debtors' notice of the Motion and opportunity for a hearing on the Motion were appropriate under the circumstances and no other notice need be provided; and this Court having reviewed the Motion and having heard the statements in support of the relief requested therein at a hearing before this Court (the "Hearing"), if any; and this Court having determined that the legal and factual bases set forth in the Motion and at the Hearing establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor,

## IT IS HEREBY ORDERED THAT:

- 1. The Motion is **GRANTED** as set forth herein.
- 2. The above-captioned chapter 11 cases are consolidated for procedural purposes only and shall be jointly administered in accordance with the provisions of Bankruptcy Rule 1015 and Local Rule 1015-1 under Case No. 24-10443 (TMH) (the "Lead Case").
- 3. All pleadings filed in the Chapter 11 Cases shall bear a consolidated caption in the following form:

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

In re

SC HEALTHCARE HOLDING, LLC et al.,

Debtors.1

Chapter 11

Case No. 24-10443 (TMH)

Jointly Administered

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, for which the Debtors

have requested joint administration, 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 will be made available on a website of the Debtors' proposed claims and noticing agent at www.kccllc.net/Petersen.

- 4. The foregoing caption satisfies the requirements set forth in section 342(c)(1) of the Bankruptcy Code.
- 5. A docket entry, substantially similar to the following, be entered on the docket in each of the Chapter 11 Cases (other than the Lead Case) to reflect the joint administration of the Chapter 11 Cases:

An order has been entered in this case consolidating this case with the case of SC Healthcare Holding, LLC Case No. 24-10443 (TMH) for procedural purposes only and providing for its joint administration in accordance with the terms hereof. The docket in Case No. 24-10443 should be consulted for all matters concerning this case.

- 6. The Debtors shall maintain, and the Clerk of the United States Bankruptcy Court for the District of Delaware shall keep, one consolidated docket and one consolidated service list for these chapter 11 cases.
- 7. Nothing contained in the Motion or this Order shall be deemed or construed as directing or otherwise effecting a substantive consolidation of these Chapter 11 Cases and this Order shall be without prejudice to the rights of the Debtors to seek entry of an order substantively consolidating their respective cases.
- 8. The Debtors and the Clerk of the United States Bankruptcy Court for the District of Delaware are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.
- 9. This Court retains jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.