

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

In re:

SC HEALTHCARE HOLDING, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 24-10443 (TMH)

(Jointly Administered)

Hearing Date: June 27, 2024 at 10:00 a.m. (ET)

Obj. Deadline: May 22, 2024 at 4:00 p.m. (ET)

**APPLICATION OF PATIENT CARE OMBUDSMAN FOR ENTRY OF AN
ORDER AUTHORIZING THE RETENTION AND EMPLOYMENT OF SAK
MANAGEMENT SERVICES, LLC d/b/a SAK HEALTHCARE, AS MEDICAL
OPERATIONS ADVISOR, *NUNC PRO TUNC* AS OF APRIL 16, 2024**

Suzanne Koenig, the patient care ombudsman (the “Ombudsman”) appointed in the chapter 11 cases (the “Chapter 11 Cases”) of SC Healthcare Holding, LLC, *et al.* (collectively, the “Debtors”) submits this application (the “Application”) for the entry of an order (the “Proposed Order”), substantially in the form attached hereto, pursuant to sections 105, 330, and 333 of title 11 of the United States Code, 11 U.S.C. §§ 101, *et seq.* (the “Bankruptcy Code”) and Rules 2014 and 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rules 2014-1 and 2016-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), authorizing the retention and employment of SAK Management Services, LLC d/b/a SAK Healthcare (“SAK”) as medical operations advisor for the Ombudsman, *nunc pro tunc* as of April 16, 2024 (the “Application”). The facts and circumstances supporting this Application are as set forth herein and in the declaration of Suzanne Koenig, as Founder & Chief Executive Officer of SAK (the “Koenig”).

¹The 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.



Declaration”), attached hereto as **Exhibit A**, and incorporated herein by reference. In support of the Application, the Ombudsman respectfully represents as follows:

Jurisdiction and Venue

1. This Court has jurisdiction over this Application pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* entered by the United States District Court for the District of Delaware on February 29, 2012. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2).

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 105, 330, and 333 of the Bankruptcy Code, Bankruptcy Rules 2014 and 2016, and Local Rules 2014-1 and 2016-1.

Background

4. On March 20, 2024, (the “Petition Date”), the Debtors each commenced the above-captioned Chapter 11 Cases by filing voluntary petitions for relief under chapter 11 of the Bankruptcy Code.

5. The Debtors, with the exception of some inactive entities, are authorized to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee or examiner has been appointed in the Chapter 11 Cases.

6. On April 10, 2024, the U.S. Trustee filed the *Concurred in Application Regarding Order Pursuant to 11 U.S.C. § 333 and Fed. R. Bankr. P. 2007.2 Directing the Appointment of a Patient Care Ombudsman* [D.I. 136] (the “Ombudsman Application”).

7. On April 10, 2024, the Court entered the *Order Pursuant to Pursuant to 11 U.S.C. § 333 and Fed. R. Bankr. P. 2007.2 Directing the Appointment of a Patient Care Ombudsman* [D.I. 137] (the “Ombudsman Order”).

8. On April 16, 2024, the U.S. Trustee filed the *Notice of Appointment of Patient Care Ombudsman Under 11 U.S.C. § 333* [D.I. 160] (the “Ombudsman Appointment”) appointing Suzanne Koenig as the Ombudsman.

9. The Ombudsman is the Founder and Chief Executive Officer of SAK Management Services, LLC d/b/a SAK Healthcare, which specializes in the operation, management and consulting of healthcare facilities, including long-term care operations, skilled nursing, and senior living facilities, with specific expertise turning around and rescuing troubled facilities. Although the Ombudsman has vast experience in the health care field, she nonetheless requires the assistance of SAK’s employees in reviewing the operations of the Debtors to appropriately and adequately discharge her duties as Ombudsman in these Chapter 11 Cases.

Relief Requested

10. By this Application, the Ombudsman seeks to employ and retain SAK as her medical operations advisor in these Chapter 11 Cases, pursuant to sections 105, 330 and 333 of the Bankruptcy Code, *nunc pro tunc* as of April 16, 2024.

11. The Ombudsman has determined that SAK has the resources and experience necessary to assist her in the fulfillment of her duties as Ombudsman. SAK has substantial experience in the health care industry and is nationally recognized for its healthcare consulting services.

12. Under the leadership of the Ombudsman, as Founder and Chief Executive Officer, SAK has represented debtors, trustees, examiners, financial institutions, and creditor committees.

SAK has assisted the Ombudsman in numerous other bankruptcy cases, including *In re American Eagle Delaware Holding Company LLC*, Case No. 22-10028 (JKS) (Bankr. D. Del.); *In re Christian Care Centers, Inc.*, Case No. 22-80000 (SGJ) (Bankr. N.D. Tex.); *In re Americore Holdings, LLC*, Case No. 19-61608 (GRS) (E.D. Ken.); *In re Illinois Skin, Inc.*, Case No. 06-16098 (MB) (Bankr. N.D. Ill.); *In re Dari Ann Ungaretti*, Case No. 06-16094 (MB) (Bankr. N.D. Ill.); *In re Bayonne Medical Center*, Case No. 07-15195 (Bankr. D. N.J.); *In re New York Westchester Square Medical Center*, Case No. 06-13050 (Bankr. S.D.N.Y.); *In re Upland Surgical Institute*, Case No. 06-11298 (Bankr. S.D. Cal.); *In re Brotman Medical Center Inc.*, Case No. 07-19705 (Bankr. C.D. Cal.); *In re Meridian Behavioral Health, LLC*, Case No. 11-10860 (Bankr. S.D.N.Y.); *In re Christ Hospital*, Case No. 12-12906 (Bankr. D. N.J.); *In re ICL Holding Company, Inc., et al.*, Case No. 12-13319 (Bankr. D. Del.); *In re Horizon Health Center, Inc.*, Case No. 13-26348 (Bankr. D. N.J.); *In re Fairmont General Hospital, Inc., et al.*, Case No. 13-01054 (Bankr. N.D. W. Va.); *In re Curae Health, Inc.*, Case No. 18-05665 (Bankr. M.D. Tenn.); *In re Westlake Property Holdings, LLC, et al.*, Case No. 19-22878 (Bankr. N.D. Ill.); and *In re Center City Healthcare, LLC*, Case No. 19-11466 (Bankr. D. Del). Given the nature of these Chapter 11 Cases and the specific duties of the Ombudsman required under section 333 of the Bankruptcy Code, the Ombudsman believes that retention of SAK is appropriate and necessary and will allow her to discharge her duties in the most effective, efficient, and timely manner.

13. The Ombudsman also requests that this Court grant SAK and its professionals permission to review confidential resident records as necessary and appropriate to assist the Ombudsman in carrying out her duties and responsibilities set forth in the Ombudsman Appointment.²

² Pursuant to the Ombudsman Order, the Ombudsman “may review confidential patient records pursuant to section 333(c)(1) of the Bankruptcy Code as necessary and appropriate to discharge the Ombudsman’s duties and

Scope of Employment

14. Subject to Court approval, the professional services that the Ombudsman expects SAK to render include, but shall not be limited to, the following:

- a. Conducting interviews of residents, family members, guardians and facility staff as required;
- b. Reviewing license and governmental permits;
- c. Reviewing adequacy of staffing, supplies and equipment;
- d. Reviewing safety standards;
- e. Reviewing facility maintenance issues or reports;
- f. Reviewing resident, family, staff or employee complaints;
- g. Reviewing risk management reports;
- h. Reviewing litigation relating to the Debtors;
- i. Reviewing resident records;
- j. Reviewing any possible sale, closure or restructuring of the Debtors and how it impacts residents;
- k. Reviewing other information, as applicable to the Debtors and these Chapter 11 Cases, including, without limitation, resident satisfaction survey results, regulatory reports, utilization review reports, discharged and transferred resident reports, staff recruitment plans and nurse/resident/acuity staffing plans;
- l. Reviewing various financial information, including, without limitation, current financial statements, cash projections, accounts receivable reports and accounts payable reports to the extent such information may impact resident care; and
- m. Assisting the Ombudsman with such other services as may be required under the circumstances of these Chapter 11 Cases, including any diligence or investigation required for the reports to be submitted by the Ombudsman.

responsibilities under this Order without the need for any further notice to any parties in interest, residents, patients or family members.” *See* Ombudsman Order, p. 2.

15. Subject to the Court's approval of this Application, SAK has indicated that it is willing to serve as the Ombudsman's medical operations advisor in these Chapter 11 Cases to perform the services described above.

SAK Does Not Hold or Represent Any Adverse Interest

16. SAK has conducted a review of potential conflicts with respect to all known parties described in Exhibit 1 to the Koenig Declaration (collectively, the "Potentially Interested Parties"). The accompanying Koenig Declaration also describes relationships, if any, that SAK has with the Potentially Interested Parties identified in Exhibit 1. To the extent required, SAK will periodically update its disclosures. Subject to further review and supplementation as required by Bankruptcy Rule 2014 and Local Bankruptcy Rule 2014-1, the connections with Potentially Interested Parties identified by SAK's conflict check are listed on Exhibit 2 to the Koenig Declaration.

17. To the best of the Ombudsman's knowledge, and except as disclosed herein and set forth in the Koenig Declaration, neither SAK, nor any of its employees, represents any interest adverse to the Debtors, its estate, its creditors, or any committee in the matters upon which SAK is to be engaged. SAK is a "disinterested person," as the Ombudsman understands this term to be defined, within the meaning of section 101(14) of the Bankruptcy Code, as modified by section 1103(b) of the Bankruptcy Code.

18. To the best of the Ombudsman's knowledge, and except as disclosed in the annexed Koenig Declaration, SAK has no prior connection with the Debtors, its creditors, or any other party-in-interest, or their respective attorneys or accountants, in the matters upon which it is to be engaged that would in any way disqualify it from representing the Ombudsman.

19. Because the Ombudsman requested and retained the services of SAK on April 16, 2024, the Ombudsman requests that any order entered authorizing such retention be effective as of April 16, 2024.

Compensation and Reimbursement of Expenses

20. Subject to Court approval, and in accordance with section 330 of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, orders of the Court, and the rules and other procedures that may be fixed by the Court, the Ombudsman requests that SAK be compensated on an hourly basis, in accordance with the ordinary and customary rates which are in effect on the date the services are rendered, plus reimbursement of the actual and necessary expenses SAK incurs, including, but not limited to, mail and express mail charges, special or hand delivery charges, photocopying charges, courier services, overnight delivery services, docket and court filing fees, telecommunications, travel expenses, expenses for working meals, computerized research and any other incidental costs advanced by SAK specifically for these matters, at the rates commonly charged for such costs to other SAK clients. In addition, SAK has advised the Ombudsman that it intends to seek compensation for all time and expenses associated with its retention as a professional, including the preparation of this Application, the Koenig Declaration, and related documents, as well as any monthly, interim, or final fee applications.

21. SAK has advised the Ombudsman that the current hourly rates applicable to the principal professionals proposed to be employed by the Ombudsman are:

Professional	Rate Per Hour
Suzanne Koenig	\$500
Jennifer Meyerowitz	\$500
Michael Brogan	\$500

Rick Snider	\$450
Carrie Baker	\$450
Ragina Channell	\$450
Keith Hufsey	\$450
Christina Kelsey	\$400
Daniel Haracz	\$250

22. Other professionals will render services to the Ombudsman as needed. Generally, SAK's hourly rates range between \$250 and \$500. The Ombudsman understands that SAK's hourly rates are subject to periodic adjustments to reflect economic and other conditions. The hourly rates will likely be adjusted upward as of January 1, 2025 and annually thereafter.

Basis for Relief

23. Courts have approved the engagement of professionals by the court-appointed Ombudsman pursuant to section 333 of the Bankruptcy Code. *See In re American Eagle Delaware Holding Company LLC*, Case No. 22-10028 (JKS) (Bankr. D. Del.); *In re Illinois Skin, Inc.*, Case No. 06-16098 (MB) (Bankr. N.D. Ill.); *In re Dari Ann Ungaretti*, Case No. 06-16094 (MB) (Bankr. N.D. Ill.); *In re Bayonne Medical Center*, Case No. 07-15195 (Bankr. D. N.J.); *In re New York Westchester Square Medical Center*, Case No. 06-13050 (Bankr. S.D.N.Y.); *In re Atlantic Health Services, Inc.*, Chapter 11 Case No. 06-10356 (PM) (Bankr. D. Md.); *In re Upland Surgical Institute*, Case No. 06-11298 (Bankr. S.D. Cal.); *In re Brotman Medical Center Inc.*, Case No. 07-19705 (Bankr. C.D. Cal.); *In re Meridian Behavioral Health, LLC*, Case No. 11-10860 (Bankr. S.D.N.Y.); *In re Christ Hospital*, Case No. 12-12906 (Bankr. D. N.J.); *In re ICL Holding Company, Inc., et al.*, Case No. 12-13319 (Bankr. D. Del.); *In re Horizon Health Center, Inc.*,

Case No. 13-26348 (Bankr. D. N.J.); *In re Fairmont General Hospital, Inc., et al.*, Case No. 13-01054 (Bankr. N.D. W. Va.); *In re Curae Health, Inc.*, Case No. 18-05665 (Bankr. M.D. Tenn.); *In re Westlake Property Holdings, LLC, et al.*, Case No. 19-22878 (Bankr. N.D. Ill.); and *In re Center City Healthcare, LLC*, Case No. 19-11466 (Bankr. D. Del). Furthermore, section 330 specifically provides that the Court may award an ombudsman appointed under section 333 “reasonable compensation for actual, necessary services rendered by the trustee, examiner, ombudsman, professional person, or attorney and by any paraprofessional person employed by any such person.” 11 U.S.C. § 330.

24. Other authority exists to grant this Application and approve the retention of professionals by the Ombudsman. The appointment of a patient care ombudsman is analogous to the appointment of an examiner, and, in many cases, courts have routinely authorized examiners to employ professionals notwithstanding the absence of express, specific authorization in the Bankruptcy Code for such employment, pursuant to Section 105. *See, e.g., In re Enron*, Case No. 01-16034 (Bankr. S.D.N.Y. 2001) (allowing examiner to retain professionals); *In re Southmark Corp.*, 113 B.R. 280, 283 (Bankr. N.D. Tx 1990) (same); *In re Tighe Mercantile, Inc.*, 62 B.R. 995, 1000 (Bankr. S.D. Cal. 1986) (“This Court holds that in appropriate circumstances, a bankruptcy court may rely on § 105(a) to authorize examiners to employ professional persons.”). *See also Synergy, supra*, authorizing counsel for an ombudsman after a discussion of several of the cases cited in this paragraph.

25. Thus, the Application should be granted by this Court to allow the Ombudsman to employ SAK to assist her in the fulfillment of her duties in these Chapter 11 Cases. *See generally 3 Collier on Bankruptcy, P 333.07* (16th 2021) (“If the ombudsman is facing a large health care

business debtor, or an especially complicated entity, the ombudsman may have to retain professionals to supplement the ombudsman's capabilities.”).

Permission to Review Confidential Resident Records

26. Under the Ombudsman Appointment, the Patient Care Ombudsman shall:

maintain any information obtained by such ombudsman under Section 333 of the Bankruptcy Code that relates to patients (including information relating to patient records) as confidential information. Such ombudsman may not review confidential patient records unless the court approves such review in advance and imposes restrictions on such ombudsman to protect the confidentiality of such records.

27. In order for the Ombudsman to carry out her duties and responsibilities set forth in the Ombudsman Appointment,³ the Ombudsman believes that SAK and its professionals must also have permission to review confidential resident records in accordance with applicable non-bankruptcy law, including HIPPA. Courts have permitted a patient care ombudsman's professionals access to confidential resident records. *See In re Center City Healthcare, LLC*, Case No. 19-11466 (Bankr. D. Del Sept. 3, 2019) [Docket No. 629]; *In re Senior Care Centers, LLC*, Case No. 18-33967 (N.D. Tex. Feb. 13, 2019) [Docket No. 500].

28. Accordingly, the Patient Care Ombudsman requests that the Court grant SAK and its professionals permission to review the confidential resident records, subject to applicable non-bankruptcy law.

Notice

29. Notice of this Application has been given to (i) the United States Trustee; (ii) counsel for the Debtors; (iii) the Debtors' forty (40) largest unsecured creditors; (iv) the office of

³ As noted, *supra*, the Ombudsman Order entered by the Court expressly provides that the Ombudsman may review confidential patient records without further notice to any parties in interest, residents, patients, or family members.

the attorney general for each of the states in which the Debtors operate; (v) United States Attorney's Office for the District of Delaware; (vi) the Internal Revenue Service; (vii) the United States Department of Justice; (viii) the DIP Lender; (ix) the Prepetition Lenders; and (x) those persons who have requested notice pursuant to Bankruptcy Rule 2002. The Ombudsman submits that, in light of the nature of the relief requested, no other or further notice need be given.

No Prior Request

30. No previous application for the relief requested herein has been made to this or any other Court.

WHEREFORE, the Ombudsman requests entry of an Order substantially in the form attached hereto, authorizing the Ombudsman to employ and retain SAK, *nunc pro tunc* as of April 16, 2024, and granting such other and further relief as is just and proper.

[Remainder of Page Intentionally Left Blank]

Dated: May 8, 2024

**SUZANNE KOENIG, AS COURT APPOINTED
PATIENT CARE OMBUDSMAN**

By: /s/ Suzanne Koenig
*Suzanne Koenig, solely in her capacity as the
Patient Care Ombudsman of SC Healthcare
Holding, LLC, et al.*

EXHIBIT A

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

In re:

SC HEALTHCARE HOLDING, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 24-10443 (TMH)

(Jointly Administered)

Hearing Date: June 27, 2024 at 10:00 a.m. (ET)

Obj. Deadline: May 22, 2024 at 4:00 p.m. (ET)

**DECLARATION OF SUZANNE KOENIG IN SUPPORT OF THE
APPLICATION OF PATIENT CARE OMBUDSMAN FOR ENTRY OF
AN ORDER AUTHORIZING THE RETENTION AND EMPLOYMENT OF
SAK MANAGEMENT SERVICES, LLC D/B/A SAK HEALTHCARE AS
MEDICAL OPERATIONS ADVISOR, *NUNC PRO TUNC* AS OF APRIL 16, 2024**

Pursuant to 28 U.S.C § 1746, I, Suzanne Koenig, hereby submit this declaration (the “Declaration”) under penalty of perjury:

1. My name is Suzanne Koenig. I am over the age of 21 and am competent in all respects to make this Declaration. I am 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”) in these chapter 11 cases of SC Healthcare Holding, LLC, *et al.*, Case No. 24-10443 (TMH) (the “Chapter 11 Cases”). I submit this Declaration as Founder and Chief Executive Officer of SAK in support of the application (“Application”) seeking entry of an Order, pursuant to sections 105, 330, and 333 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the “Bankruptcy Code”), Rules 2014 and 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rules 2014-1 and 2016-1 of the Local Rules of

¹The 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.

Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), authorizing the retention and employment of SAK, as medical operations advisor for the Ombudsman, *nunc pro tunc* as of April 16, 2024. Except as otherwise indicated herein, I have personal knowledge of the matters set forth herein and, if called as a witness, would testify competently thereto.

Qualifications of SAK Management Services, LLC

2. SAK has substantial experience in managing and turning around distressed health care businesses. SAK has served as medical operations advisor in connection with the following cases: *In re American Eagle Delaware Holding Company LLC*, Case No. 22-10028 (JKS) (Bankr. D. Del.); *In re Christian Care Centers, Inc.*, Case No. 22-80000 (SGJ) (Bankr. N.D. Tex.); *In re Americore Holdings, LLC*, Case No. 19-61608 (GRS) (E.D. Ken.); *In re New York Westchester Square Medical Center*, Case No. 06-13050 (Bankr. S.D.N.Y.); *In re Brotman Medical Center, Inc.*, Case No. 07-19705 (Bankr. C.D. Cal.); *In re Johnny Kumar Jain, M.D.* Case No. 10-24550 (Bankr. C.D. Cal.); *In re Meridian Behavioral Health LLC*, Case No. 11-10860 (Bankr. S.D.N.Y.); *In re Christ Hospital, a New Jersey not-for-profit corporation*, Case No. 12-12906 (Bankr. D. N.J.); *In re ICL Holding Company Inc., et al.*, Case No. 12-13319 (Bankr. D. Del.); *In re Horizon Health Center, Inc.*, Case No. 13-26348 (Bankr. D. N.J.); *In re Fairmont General Hospital, Inc., et al.*, Case No. 13-01054 (Bankr. N.D. W. Va.); *In re Curae Health, Inc.*, Case No. 18-05665 (Bankr. M.D. Tenn.); *In re Westlake Property Holdings, LLC, et al.*, Case No. 19-22878 (Bankr. N.D. Ill.); and *In re Center City Healthcare, LLC*, Case No. 19-11466 (Bankr. D. Del). SAK’s staff consists of experienced and licensed nurses, social workers, and dieticians.

SAK’S Disinterestedness

3. To the best of my knowledge and information after due inquiry, except as disclosed herein, SAK has no connections with the Debtors, their creditors, any other party in interest herein,

or their respective attorneys or professionals. SAK, its principal and/or employees may hold an interest in or provide services to other health care facilities and providers, including in Illinois, but do not hold or represent any entity having an adverse interest in connection with these Chapter 11 Cases, except as disclosed herein. For so long as SAK is employed by the Ombudsman, and absent further order of this Court, SAK will not accept employment from any other entity in connection with these Chapter 11 Cases.

4. In order to prepare this Declaration, I caused SAK to complete a conflicts check by comparing those names set forth on Exhibit 1 (the “Potentially Interested Parties”) to SAK’s clients and other connections. This inquiry revealed that either I personally or SAK may have relationships and prior business dealings or engagements in matters unrelated to the Debtors or these Chapter 11 Cases with certain of the Potentially Interested Parties, which relationships are disclosed on Exhibit 2.

5. Both I and SAK specialize in the operation, management, and assessment of health care businesses and may have relationships with parties in interest not currently known to me who may be creditors or interested parties of the Debtors in matters unrelated to the Debtors or these Chapter 11 Cases. To the extent that I or SAK discover any such information, I will promptly disclose such information to the Court on notice to creditors and the United States Trustee.

6. Based on the foregoing and except as set forth herein, I and SAK, insofar as I have been able to ascertain based on the information currently available to me, do not represent any interest adverse to the Debtors in the matters upon which SAK is to be engaged. To the best of my knowledge, information, and belief, both I and SAK are considered a “disinterested person” as that term is defined in section 101(14) of the Bankruptcy Code in that I and SAK:

- a. are not a creditor, equity security holder or insider of the Debtors;

- b. are not, and were not, within two years before the date of filing of the Debtors' chapter 11 petitions, a director, officer, or employee of the Debtors; and
- c. do not have an interest materially adverse to the interest of the estates or of any class of creditors or equity security holders, by reason of any direct or indirect relationship to, connection with, or interest in, the Debtors, or for any other reason.

7. Neither I nor any member or employee of SAK is a relative of the Honorable Thomas M. Horan, the Bankruptcy Judge presiding over these Chapter 11 Cases, the United States Trustee, or any person working for the United States Trustee's office.

Scope of Employment

8. The professional services that the Ombudsman expects SAK to render include, but shall not be limited to, the following:

- a. Conducting interviews of residents, family members, guardians and facility staff as required;
- b. Reviewing license and governmental permits;
- c. Reviewing adequacy of staffing, supplies and equipment;
- d. Reviewing safety standards;
- e. Reviewing facility maintenance issues or reports;
- f. Reviewing resident, family, staff or employee complaints;
- g. Reviewing risk management reports;
- h. Reviewing litigation relating to the Debtors;
- i. Reviewing resident records;
- j. Reviewing any possible sale, closure or restructuring of the Debtors and how it impacts residents;
- k. Reviewing other information, as applicable to the Debtors and these Chapter 11 Cases, including, without limitation, resident satisfaction survey results, regulatory reports, utilization review

reports, discharged and transferred resident reports, staff recruitment plans and nurse/resident/acuity staffing plans;

- l. Reviewing various financial information, including, without limitation, current financial statements, cash projections, accounts receivable reports and accounts payable reports to the extent such information may impact resident care; and
- m. Assisting the Ombudsman with such other services as may be required under the circumstances of these Chapter 11 Cases, including any diligence or investigation required for the reports to be submitted by the Ombudsman.

Professional Compensation

9. SAK intends to apply for compensation for professional services rendered in connection with these Chapter 11 Cases subject to the approval of the Court and in compliance with applicable provisions of the Bankruptcy Code, Bankruptcy Rules, Local Rules, and Orders of the Court, plus reimbursement of actual, necessary expenses and other charges incurred.

10. SAK has advised the Ombudsman that the current hourly rates applicable to the principal professionals proposed to be employed in connection with the Chapter 11 Cases:

Professional	Rate Per Hour
Suzanne Koenig	\$500
Jennifer Meyerowitz	\$500
Michael Brogan	\$500
Rick Snider	\$450
Carrie Baker	\$450
Ragina Channell	\$450
Keith Hufsey	\$450
Christina Kelsey	\$400

Daniel Haracz	\$250
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11. Other professionals will render services to the Ombudsman as needed. Generally, SAK's hourly rates range between \$250 and \$500. The Ombudsman understands that SAK's hourly rates are subject to periodic adjustments to reflect economic and other conditions. The hourly rates will likely be adjusted upward as of January 1, 2025 and annually thereafter.

12. The hourly rates set forth above are SAK's standard hourly rates for work of this nature. These rates are set at a level designed to fairly compensate SAK for its work and to cover fixed and routine overhead expenses. It is SAK's policy to charge its clients in all areas of practice for all other expenses incurred in connection with the client's case. The expenses charged to clients include, among other things, mail and express mail charges, special or hand delivery charges, photocopying charges, courier services, overnight delivery services, docket and court filing fees, telecommunications, travel expenses, expenses for working meals, computerized research and any other incidental costs advanced by the firm specifically for these matters, at the rates commonly charged for such costs to other SAK clients. In addition, SAK has advised the Ombudsman that it intends to seek compensation for all time and expenses associated with its retention as a professional, including the preparation of this Application, the Koenig Declaration, and related documents, as well as any monthly, interim, or final fee applications. In addition, in accordance with the United States Trustee's guidelines, SAK intends to charge the client for travel time at 50% of the time actually travelled.

13. Other than as set forth herein, there is no proposed arrangement to compensate SAK. SAK has not shared, nor agreed to share (a) any compensation it has received or may receive with any other party or person, or (b) any compensation another person or party has received or may receive.

14. By reason of the foregoing, I believe that SAK is eligible to be retained as medical operations advisor in the Chapter 11 Cases pursuant to sections 105, 330, and 333 of the Bankruptcy Code and the applicable Bankruptcy Rules.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States, that the foregoing statements are true and correct.

Dated: May 8, 2024

**SAK MANAGEMENT SERVICES, LLC D/B/A
SAK HEALTHCARE**

By: /s/ Suzanne Koenig
Suzanne Koenig, Founder and Chief Executive
Officer

Exhibit 1 to Koenig Declaration

Potentially Interested Parties

A. Banks

BankUnited
Better Banks
Busey Bank
CIBC
CIBM
First Mid-IL B & T
Hickory Point Bank
Hometown Community Banks
Huntington
People's
PNC Bank
Wells Fargo, N.A.
UBS

B. Debtors

Aledo HCO, LLC (d/b/a Aledo Rehabilitation & Heath Care Center)
Aledo RE, LLC (d/b/a Aledo Rehabilitation & Health Care Center)
Arcola HCO, LLC (d/b/a Arcola Health Care)
Arcola RE, LLC (d/b/a Arcola Health Care)
Aspen HCO, LLC (d/b/a Aspen Rehab & Health Care)
Aspen RE, LLC (d/b/a Aspen Rehab & Health Care)
Bement HCO, LLC (d/b/a Bement Health Care Center)
Bement RE, LLC (d/b/a Bement Health Care Center)
Betty's Garden HCO, LLC (d/b/a Betty's Garden Memory Care of Kewanee)
Betty's Garden RE, LLC (d/b/a Betty's Garden Memory Care of Kewanee)
Bradford AL RE, LLC (d/b/a Courtyard Estates of Bradford)
Bushnell AL RE, LLC (d/b/a Courtyard Estates of Bushnell)
Casey HCO, LLC (d/b/a Casey Health Care Center)
Collinsville HCO, LLC (d/b/a Collinsville Rehabilitation & Health Care Center)
Collinsville RE, LLC (d/b/a Collinsville Rehabilitation & Health Care Center)
CYE Bradford HCO, LLC (d/b/a Courtyard Estates of Bradford)
CYE Bushnell HCO, LLC (d/b/a Courtyard Estates of Bushnell)
CYE Girard HCO, LLC (d/b/a Courtyard Estates of Girard)
CYE Kewanee HCO, LLC (d/b/a Courtyard Estates of Kewanee)

CYE Kewanee- PHC, Inc. (d/b/a Courtyard Estates of Kewanee)
CYE Knoxville - PHC, Inc (d/b/a Courtyard Estates of Knoxville)
CYE Knoxville HCO, LLC (d/b/a Courtyard Estates of Knoxville)
CYE Monmouth - PHC, Inc (d/b/a Courtyard Estates of Monmouth)
CYE Monmouth HCO, LLC (d/b/a Courtyard Estates of Monmouth)
CYE Sullivan HCO, LLC (d/b/a Courtyard Estates of Sullivan)
CYE Walcott HCO, LLC (d/b/a Courtyard Estates of Walcott)
CYV Kewanee AL RE, LLC (d/b/a Courtyard Village of Kewanee)
Decatur HCO, LLC (d/b/a Decatur Rehabilitation & Health Care Center)
Decatur RE, LLC (d/b/a Decatur Rehabilitation & Health Care Center)
Eastview HCO, LLC (d/b/a Eastview Terrace)
Eastview RE, LLC (d/b/a Eastview Terrace)
Effingham HCO, LLC (d/b/a Effingham Rehabilitation & Health Care Center)
Effingham RE, LLC (d/b/a Effingham Rehabilitation & Health Care Center)
El Paso - PHC, Inc (d/b/a El Paso Health Care Center)
El Paso HCC, LLC (d/b/a El Paso Health Care Center)
El Paso HCO, LLC (d/b/a El Paso Health Care Center)
Flanagan - PHC, Inc. (d/b/a Flanagan Rehabilitation & Health Care Center)
Flanagan HCC, LLC (d/b/a Flanagan Rehabilitation & Health Care Center)
Flanagan HCO, LLC (d/b/a Flanagan Rehabilitation & Health Care Center)
Havana HCO, LLC (d/b/a Havana Health Care Center)
Havana RE, LLC (d/b/a Havana Health Care Center)
Jonesboro, LLC (d/b/a Jonesboro Rehabilitation & Health Care Center)
Kewanee AL, LLC (d/b/a Courtyard Estates of Kewanee)
Kewanee HCO, LLC (d/b/a Kewanee Care Home)
Kewanee, LLC (d/b/a Kewanee Care Home)
Knoxville & Pennsylvania, LLC
Knoxville AL, LLC (d/b/a Courtyard Estates of Knoxville)

Lebanon HCO, LLC (d/b/a Lebanon Care Center)
 Lebanon RE, LLC (d/b/a Lebanon Care Center)
 Legacy PHC, Inc. (d/b/a Legacy Estates of Monmouth)
 Legacy Estates AL, LLC (d/b/a Legacy Estates of Monmouth)
 Legacy HCO, LLC (d/b/a Legacy Estates of Monmouth)
 Macomb, LLC (d/b/a Countryview Care Center of Macomb)
 Marigold – PHC, Inc. (d/b/a Marigold Rehabilitation & Health Care Center)
 Marigold HCC, LLC (d/b/a Marigold Rehabilitation & Health Care Center)
 Marigold HCO, LLC (d/b/a Marigold Rehabilitation & Health Care Center)
 MBP Partner, LLC
 McLeansboro HCO, LLC (d/b/a McLeansboro Rehabilitation & Health Care Center)
 McLeansboro RE, LLC (d/b/a McLeansboro Rehabilitation & Health Care Center)
 Midwest Health Operations, LLC (d/b/a Cornerstone Rehabilitation & Health Care Center; Sauk Valley Senior Living & Rehabilitation Center; Shawanee Rose Care; and CenterRock River Gardens)
 Midwest Health Properties, LLC (d/b/a Cornerstone Rehabilitation & Health Care Center; Sauk Valley Senior Living & Rehabilitation Center; Shawanee Rose Care; and CenterRock River Gardens)
 Monmouth AL, LLC (d/b/a Courtyard Estates of Monmouth)
 North Aurora HCO, LLC (d/b/a North Aurora Care Center)
 North Aurora, LLC (d/b/a North Aurora Care Center)
 Petersen 23, LLC (d/b/a Palm Terrace of Mattoon)
 Petersen 25, LLC (d/b/a Casey Health Care Center)
 Petersen 26, LLC (d/b/a Flora Rehabilitation & Health Care Center)
 Petersen 27, LLC (d/b/a Toulon Rehabilitation & Health Care Center)
 Petersen 29, LLC (d/b/a Mt. Vernon Health Care Center)
 Petersen 30, LLC (d/b/a White Oak Rehabilitation & Health Care Center)
 Petersen Farmer City, LLC (d/b/a Farmer City Rehab & Health Care)
 Petersen Health & Wellness, LLC (d/b/a Enfield Rehabilitation & Health Care Center; Rock Falls Rehabilitation & Health Care Center; and Newman Rehabilitation & Health Care Center)
 Petersen Health Business, LLC (d/b/a Sandwich Rehabilitation & Health Care Center)
 Petersen Health Care - Farmer City, LLC (d/b/a Farmer City Rehab & Health Care)
 Petersen Health Care - Illini, LLC (d/b/a Illini Heritage Rehab & Health Care)

Petersen Health Care - Roseville, LLC (d/b/a Roseville Rehabilitation & Health Care)
 Petersen Health Care II, Inc. (d/b/a Simple Blessings)
 Petersen Health Care III, LLC
 Petersen Health Care Management, LLC
 Petersen Health Care V, LLC
 Petersen Health Care VII, LLC
 Petersen Health Care VIII, LLC
 Petersen Health Care X, LLC (d/b/a Flora Gardens Care Center; Nokomis Rehabilitation & Health Care Center; Rochelle Gardens Care Center; Rochelle Rehabilitation & Health Care Center; Whispering Oaks Care Center; and Willow Rose Rehab & Health Care)
 Petersen Health Care XI, LLC (d/b/a Sandwich Rehabilitation & Health Care Center)
 Petersen Health Care XIII, LLC (d/b/a Rock Falls Rehabilitation & Health Care Center)
 Petersen Health Care, Inc. (d/b/a Countryview Terrace; Courtyard Estates of Canton; and Riverview Estates of Havana)
 Petersen Health Enterprises, LLC (d/b/a Sheldon Health Care Center)
 Petersen Health Group, LLC
 Petersen Health Network, LLC (d/b/a Flora Gardens Care Center; Nokomis Rehabilitation & Health Care Center; Rochelle Gardens Care Center; Rochelle Rehabilitation & Health Care Center; Whispering Oaks Care Center; and Willow Rose Rehab & Health Care)
 Petersen Health Properties, LLC (d/b/a Countryview Care of Macomb; Jonesboro Rehabilitation & Health Care Center; and South Elgin Rehabilitation & Health Care Center)
 Petersen Health Quality, LLC (d/b/a Countryview Terrace)
 Petersen Health Systems, Inc. (d/b/a Courtyard Estates of Herscher; Courtyard Estates of Farmington; Courtyard Estates of Galva; and Courtyard Estates of Green Valley)
 Petersen Management Company, LLC (d/b/a Flora Rehabilitation & Health Care Center; Palm Terrace of Mattoon; Flora Rehabilitation & Health Care Center; Toulon Rehabilitation & Health Care Center; Mt. Vernon Health Care Center; and White Oak Rehabilitation & Health Care Center)
 Petersen MT, LLC
 Petersen MT3, LLC
 Petersen Roseville, LLC (d/b/a Roseville Rehabilitation & Health Care Center)
 Piper HCO, LLC (d/b/a Piper City Rehab & Living Center and Courtyard Estates of Piper City)
 Piper RE, LLC (d/b/a Piper City Rehab & Living Center and Courtyard Estates of Piper City)
 Pleasant View HCO, LLC (d/b/a Pleasant View Rehabilitation & Health Care Center)

Pleasant View RE, LLC (d/b/a Pleasant View Rehabilitation & Health Care Center)
 Polo - PHC, Inc. (d/b/a Polo Rehabilitation & Health Care)
 Polo HCO, LLC (d/b/a Polo Rehabilitation & Health Care)
 Polo, LLC (d/b/a Polo Rehabilitation & Health Care)
 Prairie City HCO, LLC (d/b/a Prairie City Rehabilitation & Health Care Center)
 Prairie City RE, LLC (d/b/a Prairie City Rehabilitation & Health Care Center)
 Robings HCO, LLC (d/b/a Robings Manor Rehabilitation & Health Care)
 Robings, LLC (d/b/a Robings Manor Rehabilitation & Health Care and Courtyard Estates of Brighton)
 Rosiclare HCO, LLC (d/b/a Rosiclare Rehabilitation & Health Care Center)
 Rosiclare RE, LLC (d/b/a Rosiclare Rehabilitation & Health Care Center)
 Royal HCO, LLC (d/b/a Royal Oaks Care Center)
 Royal RE, LLC (d/b/a Royal Oaks Care Center)
 SABL, LLC
 SC Healthcare Holding, LLC
 Shangri La HCO, LLC (d/b/a Shangri La Rehab & Living Center)
 Shangri La RE, LLC (d/b/a Shangri La Rehab & Living Center)
 Shelbyville HCO, LLC (d/b/a Shelbyville Rehabilitation & Health Care Center)
 Shelbyville RE, LLC (d/b/a Shelbyville Rehabilitation & Health Care Center)
 SJL Health Systems, Inc. (d/b/a Prairie Rose Health Care Center)
 South Elgin, LLC (d/b/a South Elgin Rehabilitation & Health Care Center)
 Sullivan AL RE, LLC (d/b/a Courtyard Estates of Sullivan)
 Sullivan HCO, LLC (d/b/a Sullivan Rehabilitation & Health Care Center)
 Sullivan RE, LLC (d/b/a Sullivan Rehabilitation & Health Care Center)
 Swansea HCO, LLC (d/b/a Swansea Rehabilitation & Health Care Center)
 Swansea RE, LLC (d/b/a Swansea Rehabilitation & Health Care Center)
 Tarkio HCO, LLC (d/b/a Tarkio Rehabilitation & Health Care)
 Tarkio RE, LLC (d/b/a Tarkio Rehabilitation & Health Care)
 Tuscola HCO, LLC (d/b/a Tuscola Health Care Center)
 Tuscola RE, LLC (d/b/a Tuscola Health Care Center)
 Twin HCO, LLC (d/b/a Twin Lakes Rehab & Health Care)
 Twin RE, LLC (d/b/a Twin Lakes Rehab & Health Care)

Vandalia HCO, LLC (d/b/a Vandalia Rehabilitation & Health Care Center)
 Vandalia RE, LLC (d/b/a Vandalia Rehabilitation & Health Care Center)
 Village Kewanee HCO, LLC (d/b/a Courtyard Village of Kewanee)
 Walcott AL RE, LLC (Courtyard Estates of Walcott War Drive, LLC)
 Watseka HCO, LLC (d/b/a Watseka Rehabilitation & Health Care Center)
 Watseka RE, LLC (d/b/a Watseka Rehabilitation & Health Care Center)
 Westside HCO, LLC (d/b/a Westside Rehabilitation & Care Center)
 Westside RE, LLC
 XCH, LLC

C. Debtors' Advisors

Getzler Henrich & Associates LLC
 Walker & Dunlop, Inc.
 Winston & Strawn LLP
 Young Conaway Stargatt & Taylor, LLP

D. Directors and Officers

Mark Petersen
 Marikay Snyder
 David R. Campbell

E. Insurance Providers

Addison Insurance Company
 Artisan and Truckers Casualty Co.
 AXA XL Insurance Company
 AXA XL Insurance Company UK Limited
 BlueCross BlueShield of Illinois
 CRC Insurance Services Inc.
 First Insurance Funding
 Hartford Fire Insurance Company
 HUB International Insurance Services, Inc.
 IL Secretary of State Index Dept. of Springfield, IL
 Illinois Department of Public Health
 KCP & L
 Kuhl Agency
 Liberty Utilities
 Lloyds Underwriters, Lloyds America, Inc.
 Missouri Department of Health and Senior Services
 NICOR Gas Company
 Old Republic Surety Company
 Optimed
 Pendulum Risk Consulting
 Progressive Commercial
 RT Specialty / RSUI
 Selective Insurance Company of the Southeast
 Southern Illinois Electric Corp

The Hartford
The Progressive Corporation
West Bend Insurance
West Bend Mutual Insurance Company

F. Judges

Chan, Ashely M.
Dorsey, John T.
Goldblatt, Craig T.
Horan, Thomas M.
Owens, Karen B.
Shannon, Brendan L.
Silverstein, Laurie Selber
Stickles, J. Kate
Walrath, Mary F.

G. Lenders

AMI Capital, Inc.
Assistant Secretary of Housing/Federal Housing
Commission
Bank of Farmington
Bank of Rantoul
Berkadia Commercial Mortgage, LLC
Better Bank of Chillicothe
Better Banks
Capital Funding, LLC
Chase Bank
Column Financial, Inc.
Community State Bank
Credit Suisse
eCapital
GMF Petersen Note LLC
Grandbridge Real Estate Capital LLC
Hickory Point Bank
IMHVCU
JMB Capital Partners Lending LLC
Keybank National Association
Lancaster Pollard Mortgage Company
Lument Real Estate Capital LLC
Midwest Bank of Western IL
Pillar Capital Finance LLC
Secretary of Housing and Urban Development (HUD)
Solutions Bank
UBS
X-Caliber Capital Corp.

H. Litigation Parties¹

Calltek Inc.
Capital Funding, LLC

Edith Hartsock
James Borries
Jeanette Chamberland
Jimmie Owens
Joe Winters
Judith Bill
Kenneth Denson
Margaret Butler
Mary Ellen Qureshi
Mildred Downs
Phyllis Wellenreiter
Ola Williams
Rosie L. Tipton
Russel Smith
Select Rehabilitation
Wynona Alvord
X-Caliber Capital, LLC
X-Caliber Funding LLC
Zawadi Nursing Agency

I. Material Vendors

Datamax d/b/a Summer One
Favorite Healthcare Staffing
Health Advocates Network, Inc. d/b/a Horizons
Healthcare
Lawrence Recruiting
Martin Bros
McKesson Medical-Surgical
Medical Solutions LLC
Newman Manor Inc.
Nurses PRN
Omnicare
OneStaff Medical LLC
PEL/VIP
PIPCO Companies LTD
PointClickCare Technologies Inc.
RecoverCare LLC
RehabCare
Rentokil Pest Control
Sage Intacct Inc.
Select Rehabilitation LLC
Shiftkey LLC
SNF Receivable Solutions

J. Non-Debtor Affiliates

Batavia, LLC (d/b/a Batavia Rehabilitation & Health
Care Center)
Benton HCC, LLC (d/b/a Benton Rehabilitation &
Health Care Center)

¹ The following list contains certain litigation counterparties.

Bloomington, LLC (d/b/a Bloomington Rehabilitation & Health Care Center)
 Candle Hospitality, LLC (d/b/a Candlewood Suites)
 Charleston - PHC, Inc. (d/b/a Charleston Rehabilitation & Health Care Center)
 Charleston HCC, LLC (d/b/a Charleston Rehabilitation & Health Care Center)
 Charleston HCO, LLC (d/b/a Charleston Rehabilitation & Health Care Center)
 Charter Bus Company, LLC
 Cisne, LLC (d/b/a Cisne Rehabilitation & Health Care Center)
 Cumberland - PHC, Inc. (d/b/a Cumberland Rehabilitation & Health Care)
 Cumberland HCC, LLC (d/b/a Cumberland Rehab & Health Care Center)
 Cumberland HCO, LLC (d/b/a Cumberland Rehab & Health Care Center)
 Eastside, LLC (d/b/a Eastside Health & Rehabilitation Center)
 Fondulac, LLC (d/b/a Fondulac Rehabilitation & Health Care)
 Neeley, LLC
 Neeley Incorporated Cell
 Ozark HCC, LLC (d/b/a Ozark Rehabilitation & Health Care)
 Petersen Companies, LLC
 Petersen Health Junction, LLC (d/b/a Sunset Rehabilitation & Health Care)
 Petersen Health Operations, LLC (d/b/a Batavia Rehabilitation & Health Care Center; Benton Rehabilitation & Health Care Center; Bloomington Rehabilitation & Health Care Center; Cisne Rehabilitation & Health Care Center; Sunset Rehabilitation & Health Care Center; Eastside Health & Rehabilitation Center; Fondulac Rehabilitation & Health Care Center; Ozark Rehabilitation & Health Care; and Timbercreek Rehab & Health Care)
 Petersen Hospitality, LLC (d/b/a Hampton Inn & Suites)
 Petersen Hotels, LLC (d/b/a AmericInn, Monmouth)
 Petersen MT2, LLC
 Petersen MT4, LLC²
 Plaza West Development, LLC (d/b/a Holiday Inn & Suites Peoria)
 Sunset HCC, LLC (d/b/a Sunset Rehabilitation & Health Care)
 Timbercreek HCC, LLC (d/b/a Timbercreek Rehabilitation & Health Care)
 Twenty Four Corp, LLC

K. Office of the United States Trustee

Adam Shaarawy
 Adela Alfaro
 Andrew R. Vara
 Angeliza Ortiz-Ng
 Benjamin Hackman
 Christine Green
 D. Troy Sellars
 Daniel C. Kropiewnicki
 Dave P. Adams
 David Berry
 David Gerardi
 David Milko
 Diane Giordano
 Dianne P. Dugan
 Dion Wynn
 Edith A. Serrano
 Elizabeth Thomas
 Fang Bu
 Fran B. Steele
 Francyne D. Arendas
 Frederic J. Baker
 George M. Conway
 Gregory B. Schiller
 Hannah Deininger
 Hannah M. McCollum
 Holly Dice
 Hugh J. Ward
 James B. Lambe
 James Gannone
 James R. O'Malley
 James Stives
 Jane Leamy
 Jeffrey Sponder
 Joanne E. Clausen
 Jodi Hause
 John Schanne
 Jonathan Lipshie
 Jonathan Nyaku
 Joseph C. Kern
 Joseph Cudia
 Joseph McMahon
 Joseph Schalk
 Kacie Cartwright
 Kathleen Blasi
 Kevin P. Callahan
 Kirsten K. Ardelean
 Lauren Attix
 Lauren Bielskie
 Linda Casey
 Linda Richenderfer
 Lisa Geyer

² The Debtors intend to seek dismissal of this entity from these Chapter 11 Cases.

Lisa L. Costa
 Maggie McGee
 Malcolm M. Bates
 Maria Nicole Borgesi
 Marta E. Villacorta
 Martha Hildebrandt
 Michael Artis
 Michael Girello
 Nancy Miller
 Nicole Watson
 Nyanquoi Jones
 Peter J. D'Auria
 Rachel Wolf
 Rebecca Plesic
 Richard Schepacarter
 Robert J. Schneider, Jr.
 Rosa Sierra-Fox
 Shakima L. Dortch
 Sharon Pasniewski
 Steven Albright
 Tia Green
 Timothy J. Fox, Jr.
 Tina L. Oppelt
 Wendy Paul
 William J. Ziemer

L. Taxing Authorities

Atchison County Treasurer
 Camden County
 Christian County Collector
 Clark County Collector
 Clay County Collector
 Coles County Collector
 Cumberland County Treasurer
 DeKalb County Collector
 Dewitt County Collector
 Douglas County Collector
 Edgar County Collector
 Edgar County Treasurer
 Effingham County Treasurer
 Fayette County Collector
 Ford County Collector
 Ford County Treasurer
 Franklin County Treasurer
 Fulton County Collector
 Hamilton County Collector
 Hardin County Treasurer
 Illinois Department of Healthcare and Family Services
 Illinois Office of Comptroller - Chicago
 Illinois Office of Comptroller - Springfield
 Illinois Secretary of State
 Illinois State Treasurer
 Internal Revenue Service
 Iowa Department of Revenue
 Iowa Dept of Revenue and Finance

Iroquois County Collector
 Jackson County Collector
 Jefferson County Collector
 Jersey County Collector
 Kane County Collector
 Macon County Collector
 Madison County Treasurer
 McDonough County Collector
 Mercer County Collector
 Missouri Department of Revenue
 Montgomery County Collector
 Ogle County Collector
 Piatt County Collector
 Rock Island County Collector
 Saline County Collector
 Shelby County Treasurer
 St Clair County Collector
 Stark County Collector
 Union County Collector
 Woodford County Treasurer

M. Utility Providers

Alliant Energy
 Ameren IL
 Ascentium Capital
 AT&T
 Brighton Water & Sewer Department
 Brightspeed
 Bushnell Municipal
 Cass Communications Management Inc.
 CenturyLink
 Charter Communications
 Christina Smith
 Citrix Systems Inc
 City of Aledo
 City of Arcola
 City of Blue Springs Utility
 City of Canton
 City of Casey
 City of Collinsville
 City of Decatur
 City of Effingham Water Dept
 City of El Paso
 City of Farmer City
 City of Flora
 City of Galesburg
 City of Galva Water Department
 City of Girard
 City of Havana
 City of Jonesboro
 City of Kewanee
 City of Knoxville
 City of Lebanon
 City of Mattoon
 City of McLeansboro

City of Monmouth
 City of Morrison
 City of Mt. Vernon
 City of Newman
 City of Nokomis
 City of Paris
 City of Peoria - Stormwater
 City of Polo
 City of Rock Falls
 City of Sandwich
 City of Silvis
 City of Sullivan
 City of Toulon
 City of Tuscola
 City of Vandalia
 City of Walcott
 City of Watseka
 City of West Frankfort
 Coles-Moultrie Electric Cooperative
 Comcast Cable
 ComEd
 Computer Techniques Inc
 Consolidated Communications
 Constellation NewEnergy
 Conxxus
 Crystal Simmons
 DIRECTV
 Dish Network
 E J Water Cooperative Inc
 Evergy
 Ferrellgas
 Fox Metro
 Frontier
 Goldstar Software
 Grafton Technologies
 Granite Telecommunications
 Greater Peoria Sanitary District
 Guaranteed Ink
 Harrisburg Water Department
 Home Field Energy
 Illinois American Water
 Liberty Utilities
 Lifeloop
 Macomb City Waterworks
 Mediacom
 MidAmerican Energy Company

Midwest Data Center
 Nicor Gas
 Nitro
 Pana City Water Department
 Peoria Heights Waterworks
 Piasa Motor Fuels, LLC
 PointClickCare Technologies Inc
 Prairie City Water
 Rentokil
 Rochelle Municipal Utilities
 Royell Communications
 Shadow Fax Projects
 Shawnee Communications-Whispering
 Shelby Electric Cooperative
 Shelbyville Water Dept
 South Central FS
 SouthEastern Illinois Electric Coop
 Southern Illinois Electric Cooperative
 Sparklight
 Spire
 Stellar Private Cable Systems
 Stratus Networks
 Swansea Sewer Department
 Tarkio Board of Public Works
 Touchtone
 Urbana-Champaign Sanitary District
 Verizon Wireless
 Village of Bement
 Village of Bradford
 Village of Enfield Utilities
 Village of Herscher
 Village of North Aurora
 Village of Piper City
 Village of Roseville
 Village of South Elgin
 Wabash Communications

N. **40 Largest Unsecured Claims (Not otherwise listed herein)**

Ginoli & Company LTD
 CliftonLarsonAllen LLP
 Baker Tilly US LLP

Exhibit 2 to Koenig Declaration

Potential Parties in Interest Disclosure

1) In the past, SAK has worked on engagements with the following parties either on the same side or on opposing sides solely on matters unrelated to the Debtors in these cases:

Debtors' Advisors

Walker Dunlop
Getzler Henrich & Associates LLC
Winston & Strawn LLP
Young Conaway Stargatt & Taylor, LLP

Committees' Advisors

Greenberg Traurig

2) Greenberg Traurig currently represents affiliates of SAK in matters unrelated to the Debtors' bankruptcy cases.

3) SAK currently uses the following interested parties in the operation of its business solely in matters unrelated to the Debtors in these cases:

Lender

Chase

Insurance Companies

Blue Cross Blue Shield of Illinois

Utility

Comcast

4) Many years ago, SAK employees met and had conversations and discussions with the following interested parties in matters completely unrelated to the Debtors in these cases:

Directors & Officers

Mark Petersen
Marikay Snyder
David R. Campbell

5) SAK has managed healthcare facilities that do business with the following parties in interest on matters unrelated to the Debtors in these cases:

Material Vendors

Martin Bros
McKesson Medical-Surgical
Omnicare
PointClickCare Technologies Inc.
RecoverCare LLC
RehabCare

Sage Intacct Inc.
Select Rehabilitation LLC
Shiftkey LLC

6) SAK may have in the past had business relationships with the parties listed below solely in matters unrelated to the Debtors or these cases:

Lenders

Assistant Secretary of
Housing/Federal Housing
Commission
Berkadia Commercial Mortgage,
LLC
Capital Funding, LLC
Credit Suisse
eCapital
Keybank National Association
Lancaster Pollard Mortgage
Company
Lument Real Estate Capital LLC
Midwest Bank of Western IL

Secretary of Housing and Urban
Development (HUD)
UBS

Banks

BankUnited
Busey Bank
CIBC
First Mid-IL B & T
Huntington
People's
PNC Bank
Wells Fargo, N.A.
UBS

7) SAK has managed healthcare facilities that do business with the following parties in interest on matters completely unrelated to the Debtors in these cases:

Insurance Companies

BlueCross BlueShield of Illinois
First Insurance Funding
Hartford Fire Insurance Company
HUB International Insurance
Services, Inc.
IL Secretary of State Index Dept. of
Springfield, IL
Illinois Department of Public Health
In respect of Llyods Underwriters,
Llyods America, Inc.
Missouri Department of Health and
Senior Services
NICOR Gas Company
The Hartford

Litigation Parties

Capital Funding, LLC

Taxing Authorities

Effingham County Treasurer

Effingham County Treasurer
Fayette County Collector
Hamilton County Collector
Hamilton County Collector
Hardin County Treasurer
Illinois Department of Healthcare
and Family Services
Illinois Department of Healthcare
and Family Services
Illinois Department of Healthcare
and Family Services
Illinois Office of Comptroller -
Chicago
Illinois Office of Comptroller -
Springfield
Illinois Secretary of State
Illinois State Treasurer
Internal Revenue Service
Madison County Treasurer
Rock Island County Collector

Utility Providers

Ascentium Capital
AT&T
City of Vandalia
Comcast Cable
ComEd
DIRECT TV
DIRECTV
Dish Network

Ferrellgas
Mediacom
MidAmerican Energy Company
Midwest Data Center
Nicor Gas
PointClickCare Technologies Inc
Swansea Sewer Department
Urbana-Champaign Sanitary District
Verizon Wireless

8) SAK has learned that the Debtors may employ employee individuals who were either former employees of SAK or worked at facilities in which SAK provided services.

9) Employees of SAK may have served on a board or committee in an industry association with the judges listed below in matters completely unrelated to the Debtors' cases:

Horan, Thomas M.
Shannon, Brendan L.
Stickles, J. Kate
Walrath, Mary F.

10) In the past, employees of SAK may have previously communicated with the below referenced employees with the United States Trustee's Office on matters completely unrelated to the Debtors' cases:

Andrew R. Vara
Benjamin Hackman
Christine Green
Diane Giordano
Dion Wynn
Edith A. Serrano
Elizabeth Thomas
Fang Bu
Hannah M. McCollum
Holly Dice
James R. O'Malley
Jane Leamy
Jonathan Lipshie

Jonathan Nyaku
Joseph Cudia
Joseph McMahon
Lauren Attix
Linda Casey
Linda Richenderfer
Malcolm M. Bates
Michael Girello
Nyanquoi Jones
Richard Schepacarter
Rosa Sierra-Fox
Shakima L. Dortch
Timothy J. Fox, Jr.

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

In re:

SC HEALTHCARE HOLDING, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 24-10443 (TMH)

(Jointly Administered)

Hearing Date: June 27, 2024 at 10:00 a.m. (ET)

Obj. Deadline: May 22, 2024 at 4:00 p.m. (ET)

**NOTICE ON APPLICATION OF PATIENT CARE OMBUDSMAN FOR ENTRY
OF AN ORDER AUTHORIZING THE RETENTION AND EMPLOYMENT OF
SAK MANAGEMENT SERVICES, LLC D/B/A SAK HEALTHCARE, AS
MEDICAL OPERATIONS ADVISOR, *NUNC PRO TUNC* AS OF APRIL 16, 2024**

PLEASE TAKE NOTICE THAT on **May 8, 2024** Suzanne Koenig, the appointed patient care ombudsman (the “Ombudsman”) filed the *Application of Patient Care Ombudsman for Entry for an Order Authorizing and Approving the Employment of SAK Management Services, LLC d/b/a SAK Healthcare, as Medical Operations Advisor, Nunc Pro Tunc to April 16, 2024* (the “Application”).

PLEASE TAKE NOTICE THAT that responses, if any, to the Application must be in writing, in conformity with the Federal Rules of Bankruptcy Procedure and the Local Rules of the United States Bankruptcy Court for the District of Delaware, filed with the Bankruptcy Court and served upon the undersigned counsel so as to be received on or before **May 22, 2024 at 4:00 p.m. (ET)** (the “**Objection Deadline**”). At the same time, you must also serve a copy of the response upon Applicant’s proposed attorneys:

Cheryl A. Santaniello, Esq.
Porzio, Bromberg & Newman, P.C.
300 Delaware Avenue, Suite 1220

Robert M. Schechter, Esq.
Christopher P. Mazza, Esq.
Porzio, Bromberg & Newman, P.C.

¹The 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.

Wilmington, DE 19801
Telephone: (302) 526-1235
Facsimile: (302) 416-6064
Email: casantaniello@pbnlaw.com

100 Southgate Parkway
P.O. Box 1997
Morristown, NJ 07962
Telephone: (973) 538-4006
Facsimile: (973) 538-5146
Email: rmschechter@pbnlaw.com
Email: cpmazza@pbnlaw.com

If Objections are filed, a hearing on the Application will be held on **June 27, 2024 at 10:00 a.m. (ET)** before the Honorable Thomas M. Horan, United States Bankruptcy Judge, at the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 5th Floor, Courtroom #6, Wilmington, Delaware 19801.

PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED BY THE APPLICATION WITHOUT FURTHER NOTICE OR HEARING.

Dated: May 8, 2024

/s/ Cheryl A. Santaniello
Cheryl A. Santaniello, Esq. (DE Bar No. 5062)
Porzio, Bromberg & Newman, P.C.
300 Delaware Avenue, Suite 1220
Wilmington, DE 19801
Telephone: (302) 526-1235
Facsimile: (302) 416-6064
E-mail: casantaniello@pbnlaw.com

Robert M. Schechter, Esq. (*pro hac vice*)
Christopher P. Mazza, Esq. (*pro hac vice*)
Porzio, Bromberg & Newman, P.C.
100 Southgate Parkway
P.O. Box. 1997
Morristown, New Jersey 07962
Telephone: (973) 538-4006
Facsimile: (973) 538-5146
Email: rmschechter@pbnlaw.com
Email: cpmazza@pbnlaw.com

*Proposed Counsel for the Patient Care
Ombudsman*

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

In re:

SC HEALTHCARE HOLDING, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 24-10443 (TMH)

(Jointly Administered)

**ORDER GRANTING APPLICATION OF PATIENT CARE
OMBUDSMAN FOR ENTRY OF AN ORDER AUTHORIZING THE
RETENTION AND EMPLOYMENT OF SAK MANAGEMENT
SERVICES, LLC D/B/A SAK HEALTHCARE, AS MEDICAL
OPERATIONS ADVISOR, *NUNC PRO TUNC* AS OF APRIL 16, 2024**

Upon consideration of the Application of Patient Care Ombudsman (“Ombudsman”) for Entry of an Order Authorizing the Retention and Employment of SAK Management Services, LLC d/b/a SAK Healthcare (“SAK”) as Medical Operations Advisor *Nunc Pro Tunc* to April 16, 2024 (the “Application”),² pursuant to sections 105, 330, and 333 of the Bankruptcy Code, Rules 2014 and 2016 of the Bankruptcy Rules, Rules 2014-1 and 2016-1 of the Local Rules, and upon reviewing and considering the Declaration of Suzanne Koenig (the “Koenig Declaration”) in support of the Application; and it appearing that the Court has jurisdiction over the Application pursuant to 28 U.S.C. §157(b)(2)(A); and due and adequate notice of the Application having been given; and it appearing that no other or further notice need be given; and this Court having determined that based upon the representations in the Application and the Koenig Declaration, SAK represents no interest adverse to the Debtors’ estates or their creditors with respect to the

¹The 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.

²Capitalized terms not otherwise defined herein shall have the meanings set forth in the Application.

matters upon which it is to be engaged, SAK is a disinterested person as that term is defined under section 101(14) of the Bankruptcy Code, and SAK's employment is in the best interests of the Debtors' estates and creditors; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Application is GRANTED as set forth herein.
2. Pursuant to Bankruptcy Code sections 105 and 333, Bankruptcy Rules 2014(a) and 2016, and Local Rules 2014-1 and 2016-1, the Ombudsman is authorized to retain and employ SAK as medical operations advisor in these Chapter 11 Cases, *nunc pro tunc* to April 16, 2024.
3. SAK is authorized to render the professional services described in the Application and the Koenig Declaration.
4. SAK shall be compensated in accordance with Bankruptcy Code sections 330 and 331, applicable Bankruptcy and Local Rules, and such other procedures as may be fixed by order of the Court. SAK shall make a reasonable effort to comply with the U.S. Trustee's requests for information and additional disclosures. SAK shall be permitted to seek and obtain compensation pursuant to the procedures and timeline set forth in the Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals [Dkt #235].
5. SAK shall use its reasonable best efforts to avoid any duplication of services provided by any of the Ombudsman's other retained professionals in the Chapter 11 Cases.
6. Notwithstanding anything to the contrary in the Application, the Koenig Declaration, the terms of any engagement letter, or this Order, absent a change in controlling law, SAK shall not seek reimbursement of any fees or costs of its counsel arising from the prosecution or defense of any of SAK's fee applications in these Chapter 11 Cases.

7. SAK and its professionals may review confidential resident records as necessary and appropriate to assist the Ombudsman in discharging her duties and responsibilities under the Appointment Order; provided, however, that SAK and its professionals shall protect the confidentiality of all such resident records as required under applicable non-bankruptcy law and regulations including, but not limited to, the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”) and the federal HIPAA privacy regulations at 45 Code of Federal Regulations.

8. The Court shall retain jurisdiction to hear and determine all matters arising from the implemental of this Order.

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

In re:

SC HEALTHCARE HOLDING, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 24-10443 (TMH)

(Jointly Administered)

CERTIFICATE OF SERVICE

I hereby certify that on May 8, 2024, the foregoing *Application of Patient Care Ombudsman for Entry for an Order Authorizing and Approving the Employment of SAK Management Services, LLC d/b/a SAK Healthcare, as Medical Operations Advisor, Nunc Pro Tunc to April 16, 2024* was electronically filed via CM/ECF and served via CM/ECF upon all parties registered to receive CM/ECF notices in these cases, and I caused to be served upon the parties listed in the attached **Exhibit A** via first class mail.

Dated: May 8, 2024

/s/ Cheryl A. Santaniello
Cheryl A. Santaniello, Esq.

¹The 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

Description	CreditorName	CreditorNoticeName	Address1	Address2	City	State	Zip
Bankruptcy Servicer for Ford Motor Credit Company, LLC	AIS Portfolio Services, LLC	Ford Motor Credit Company, LLC Department	4515 N Santa Fe Ave. Dept. APS		Oklahoma City	OK	73118
Top 40 Creditor	Alvord, Wynona (Deborah L. Royce as Attorney-In-Fact for Wynona Alvord)	Taxman, Pollock, Murray, and Bekkerman, Colleen Mixan Mikaitis	225 W. Wacker Dr., Ste. 1650		Chicago	IL	60606
Prepetition Lenders	AMI Capital, Inc.	Servicing Department	7200 Wisconsin Ave., Suite 200		Bethesda	MD	20814
Prepetition Lenders	Assistant Secretary of Housing/Federal Housing Commissioner, DHUD, Washington, DC ISAOA ATIMA	Lument Real Estate Capital, LLC	10 W. Broad Street	8th Floor	Columbus	OH	43215
Top 40 Creditor	Baker Tilly US LLP	Colin J. Walsh	205 N Michigan Ave., 28th Floor		Chicago	IL	60601-5927
Counsel to Lument Real Estate Capital LLC, f/k/a Lancaster Pollard Mortgage Company	BALLARD SPAHR LLP	Matthew G. Summers, Laurel D. Roglen, Margaret Vesper	919 North Market Street, 11th Floor		Wilmington	DE	19801-3034
Prepetition Lenders	Bank of Farmington		16 North Main	PO Box 320	Farmington	IL	61531
Prepetition Lenders	Bank of Rantoul		201 E Campaign		Rantoul	IL	61866
Prepetition Lenders	Berkadia Commercial Mortgage, LLC		323 Norristown Road, Suite 300		Ambler	PA	19002
Prepetition Lenders	Berkadia Commercial Mortgage, LLC and the Assistant Secretary for Housing-Federal Housing Commissioner, DHUD	c/o Berkadia Commercial Mortgage LLC	PO Box 557		Ambler	PA	19002
Prepetition Lenders	Better Bank of Chillicothe		900 N. 4th Street		Chillicothe	IL	61523-1708
Prepetition Lenders	Better Banks		5600 S. Adams St.		Bartonville	IL	61607-1902
Prepetition Lenders	Better Banks		201 N. 2nd St.		Dunlap	IL	61525-8001
Top 40 Creditor	Bill, Judith	Parker & Parker, Robert Parker	300 NE Perry Ave.		Peoria	IL	61603
Counsel for X-Caliber Funding LLC	Blank Rome LLP	Kenneth J Ottaviano Paige B Tinkham	444 West Lake St Ste 1650		Chicago	IL	60606
Counsel for X-Caliber Funding LLC	Blank Rome LLP	Lawrence R Thomas III Jordan L Williams	1201 Market Street Ste 800		Wilmington	DE	19801
Top 40 Creditor	Borries, James (Jane A Spiker & Jeffrey L. Borries, Independent Co-Executors of the Estate of James L. Borries, Sr., deceased)	Sutterfield Law Offices, David Sutterfield	208 S. Second St.		Effingham	IL	62401
Counsel to McKesson Corporation, on behalf of itself and certain corporate affiliates	Buchalter, A Professional Corporation	Jeffrey K. Garfinkle, Esq.	18400 Von Karman Avenue, Suite 800		Irvine	CA	92612
Counsel to Wells Fargo Bank, N.A.	Burr & Forman LLP	J. Cory Falgowski	222 Delaware Avenue, Suite 1030		Wilmington	DE	19801
Top 40 Creditor	Butler, Margaret (Daniel Hall Butler and Kevin Randall Butler, as Independent Co-Executors of the Estate of Ola Margaret Butler, deceased)	Hopkins & Huebner, PC, Glenn Ruud	100 E. Kimberly Road, Suite 400	Northwest Bank Tower	Davenport	IA	52806-5943
Prepetition Lenders	Capital Funding, LLC	General Counsel	1422 Clarkview Road		Baltimore	MD	21209
Top 40 Creditor	Chamberland, Jeanette (Mary Williams, as Independent Executrix of the Estate of Jeanette Chamberland)	Konicek & Dillon, PC, Thomas Dillon	70 W. Madison St., #2600		Chicago	IL	60602
Prepetition Lenders	Chase Bank		7707 N. Knoxville Ave.		Peoria	IL	61614-2080
Top 40 Creditor	CliftonLarsonAllen LLP	Adam M. Matheson, Associate General Counsel	PO Box 775967		Chicago	IL	60677-5967
Prepetition Lenders	Column Financial	N. Dante LaRocca	Eleven Madison Avenue		New York	NY	10010
Prepetition Lenders	Community State Bank		625 SE 2nd Street	P.O. Box 78	Galva	IL	61434
Prepetition Lenders	Community State Bank of Kewanee		PO Box 549		Kewanee	IL	61443
Top 40 Creditor	Constellation NewEnergy	Gas Division LLC, Karen Green	PO Box 5473		Carol Stream	IL	60197-5473
Counsel for Omnicare, Inc. and its Affiliated Entities	Cooch and Taylor, P.A	R. Grant Dick IV, Esq	The Brandywine Building	1000 N. West St., Suite 1500	Wilmington	DE	19801
Prepetition Lenders	Credit Suisse	McGuireWoods LLP	Art Gambill, Esq.	1230 Peachtree Street, N.E., Suite 2100	Atlanta	GA	30309-3534
Prepetition Lenders	Credit Suisse	Patrick Hart	11 Madison Avenue		New York	NY	10010
Prepetition Lenders	Credit Suisse	Sector Financial Inc.	Attn Healthcare Portfolio Manager	5404 Wisconsin Avenue, Suite 410	Chevy Chase	MD	20815
Top 40 Creditor	Datamax dba Sumner One	Edmund Sumner	PO Box 5180		St. Louis	MO	63139-0180
Delaware State AG and DOJ	Delaware Dept of Justice	Attorney General	Attn Bankruptcy Department	Carvel State Building	Wilmington	DE	19801
DE Secretary of State	Delaware Secretary of State	Division of Corporations	Franchise Tax	820 N French St	Dover	DE	19903
DE State Treasury	Delaware State Treasury		820 Silver Lake Blvd., Suite 100	PO Box 898	Dover	DE	19904

Description	CreditorName	CreditorNoticeName	Address1	Address2	City	State	Zip
Top 40 Creditor Counsel for Martin Brothers Distributing Company, Inc.	Denson, Kenneth (Kenneth C. Denson, II, as Independent Administrator of the Estate of Kenneth Clarence Denson, Sr., deceased)	Kralovec, Jambois & Schwartz, Eva Golabek	60 W Randolph St., 4th Floor		Chicago	IL	60601
	DLA Piper LLP	Aaron S. Applebaum, Emily C.S. Jones	1201 North Market Street, Ste. 2100		Wilmington	DE	19801
Top 40 Creditor	Downs, Mildred (Janet Van Gundy, as Independent Administrator of the Estate of Mildred M. Downs, deceased)	The Law Offices of Steven J. Malman, Patricia Gifford	505 West University Avenue, Suite 119		Champaign	IL	61820
Prepetition Lenders	eCapital	Kincaid, Frame & Associates Co., LPA	Timothy J. Kincaid	6151 Wilson Mills Road, Suite 310	Highland Heights	OH	44143
Prepetition Lenders	eCapital	Legal Department	20807 Biscayne Blvd, Suite 203		Aventura	FL	33180
Top 40 Creditor Counsel for Omnicare, Inc. and its Affiliated Entities	Favorite Healthcare Staffing	Miranda Dingman	PO Box 26225		Overland Park	KS	66225
Prepetition Lenders	Foley & Lardner, LLP	Geoffrey S. Goodman, Esq.	321 N. Clark St., Ste. 3000		Chicago	IL	60654-4762
Prepetition Lenders	Ford Credit		PO Box 542000		Omaha	NE	68154
Counsel to Hickory Point Bank & Trust	Gellert Scali Busenkell & Brown, LLC	Michael Busenkell, Esq.	1201 North Orange Street, Suite 300		Wilmington	DE	19801
Top 40 Creditor	Ginoli & Company LTD	Michael Remmele, CPA	7625 North University, Suite A		Peoria	IL	61614-8303
Prepetition Lenders	GMF Petersen Note LLC	c/o GMF Capital, Daniel Klodor	650 Madison Avenue, Floor 22		New York	NY	10022
Prepetition Lenders	GMF Petersen Note LLC	McDermott Will & Emery LLP	Brian R. Donnelly	340 Madison Avenue	New York	NY	20006
Prepetition Lenders	Grandbridge Real Estate Capital LLC						
Proposed Counsel to Official Committee of Unsecured Creditors	ISAOA/ATIMA		214 North Tryon Street	Suite 2000	Charlotte	NC	28202
Proposed Counsel to Official Committee of Unsecured Creditors	Greenberg Traurig, LLP	Anthony W. Clark, Dennis A. Meloro	222 Delaware Avenue	Suite 1600	Wilmington	DE	19801
Proposed Counsel to Official Committee of Unsecured Creditors	Greenberg Traurig, LLP	Nancy A. Peterman, Danny Duerdoth	77 West Wacker Drive	Suite 3100	Chicago	IL	60601
Proposed Counsel to Official Committee of Unsecured Creditors	Greenberg Traurig, LLP	Shari L. Heyen	1000 Louisiana Street	Suite 6700	Houston	TX	77002
Counsel to Hickory Point Bank & Trust	Hart, Southworth & Witsman	Samuel J. Witsman, Esq.	1 North Old State Capitol Plaza	Suite 501	Springfield	IL	62701
Top 40 Creditor	Hartsock, Edith (Kim U. Hartsock, as Independent Executor of the Estate of Edith S. Hartsock, deceased)	The Law Offices of Steven J. Malman, Patricia Gifford	505 West University Avenue, Suite 119		Champaign	IL	61820
Top 40 Creditor	Health Advocates Network Inc. dba Horizons Healthcare	Monica Liebal	1875 NW Corporate Boulevard, Suite 120		Boca Raton	FL	33431
Prepetition Lenders	Hickory Point Bank		225 N Water St.		Decatur	IL	62523
Counsel for Column Financial, Inc.	Holland & Knight LLP	David E Lemke Tyler Layne	Nashville City Center	511 Union St Ste 2700	Nashville	TN	37219
Counsel for Column Financial, Inc.	Holland & Knight LLP	Trip Nix	100 Congress Ave Ste 1800		Austin	TX	78701
Prepetition Lenders	IHMVCU		PO Box 810		Moline	IL	61265
Illinois Attorney General	Illinois Attorney General	Attn Bankruptcy Department	James R. Thompson Ctr	100 W. Randolph St.	Chicago	IL	60601
IRS	Internal Revenue Service	Attn Susanne Larson	31 Hopkins Plz Rm 1150		Baltimore	MD	21201
IRS	Internal Revenue Service	Centralized Insolvency Operation	PO Box 7346		Philadelphia	PA	19101-7346
IRS	Internal Revenue Service	Centralized Insolvency Operation	2970 Market St		Philadelphia	PA	19104
Iowa Attorney General	Iowa Attorney General	Attn Bankruptcy Department	Hoover State Office Bldg	1305 E. Walnut Street	Des Moines	IA	50319
Prepetition Lenders	JMB Capital Partners Lending, LLC	Robert M. Hirsch	Norton Rose Fulbright US LLP	1301 Avenue of the Americas	New York	NY	10019-6022
Claims Agent	KCC	Andres Estrada	222 N Pacific Coast Highway, Suite 300		El Segundo	CA	90245
Prepetition Lenders	KeyBank National Association as Servicer for an on behalf of Credit Suisse First Boston Mortgage Capital LLC		11501 Outlook Street	Suite 300	Overland Park	KS	66211
Prepetition Lenders	Lancaster Pollard Mortgage Company	Loan Servicing	65 East State Street, 16th Floor		Columbus	OH	43215
Counsel for Column Financial, Inc.	Landis Rath & Cobb LLP	Richard S Cobb Joshua B Brooks	919 Market St Ste 1800		Wilmington	DE	19801
Top 40 Creditor	Lawrence Recruiting Specialists Inc.	Paige Wischmann	1120 N. 103rd Plaza, Suite 300		Omaha	NE	68114
Top 40 Creditor	Martin Bros	Nyemaster Goode P.C., Kristina M. Stanger	406 Viking Road		Cedar Falls	IA	50613
Counsel to GMF Petersen Note, LLC	McDermott Will & Emery LLP	David R Hurst	The Brandywine Building	1000 N West St Ste 1400	Wilmington	DE	19801
Counsel to GMF Petersen Note, LLC	McDermott Will & Emery LLP	Kristin Going Stacy A Lutkus	One Vanderbilt Ave		New York	NY	10017-3852
Attorneys for Hartford Fire Insurance Company and its affiliated sureties	McElroy, Deutsch, Mulvaney & Carpenter, LLP	Gary D. Bressler, Esq.	300 Delaware Avenue, Suite 1014		Wilmington	DE	19801

Description	CreditorName	CreditorNoticeName	Address1	Address2	City	State	Zip
Top 40 Creditor	McKesson Medical-Surgical	Attn Legal Dept	6651 Gate Parkway		Jacksonville	FL	32256
Top 40 Creditor	Medical Solutions LLC	Chris Wells	PO Box 850737		Minneapolis	MN	55485-0737
Prepetition Lenders	Midwest Bank of Western IL		200 E. Broadway		Monmouth	IL	61462-1871
Missouri Attorney General	Missouri Attorney General	Attn Bankruptcy Department	Supreme Court Bldg	207 W. High St. P.O. Box 899	Jefferson City	MO	65101
Counsel to JMB Capital Partners Lending LLC	Morris James LLP	Eric J. Monzo Brya M Keilson Christopher M Donnelly	500 Delaware Ave Ste 1500		Wilmington	DE	19801
Top 40 Creditor	Newman Manor Inc C/O Newman Bank	Harold N. Adams Meyer Capel	2481 US-36		Newman	IL	61942
Counsel to JMB Capital Partners Lending LLC	Norton Rose Fulbright US LLP	Robert M Hirsh Francisco Vazquez Emily Hong	1301 Avenue of the Americas		New York	NY	10019-6022
DIP Lender	Norton Rose Fulbright US LLP	Robert M. Hirsch	1301 Avenue of the Americas		New York	NY	10019-6022
Top 40 Creditor	Nurses PRN	Tim Hansen	1101 East South River Street		Appleton	WI	54915
Counsel for Martin Brothers Distributing Company, Inc.	Nyemaster Goode, P.C.	Kristina M. Stanger	700 Walnut Street, Ste. 1600		Des Moines	IA	50309
Counsel for the Illinois Department of Healthcare and Family Services	Office of the Illinois Attorney General	John P. Reding Assistant AG	115 South LaSalle Street		Chicago	IL	60603
US Trustee for District of DE	Office of the United States Trustee Delaware	Linda Richenderfer	844 King St Ste 2207	Lockbox 35	Wilmington	DE	19801
Top 40 Creditor	Omnicare Department 781668	Foley & Lardner LLP, Geoffrey S. Goodman	PO Box 78000		Detroit	MI	48278-1668
Top 40 Creditor	Onestaff Medical LLC	Ben Nelson	10802 Farnam Drive		Omaha	NE	68154
Top 40 Creditor	Owens, Jimmie (Angela Rich, as Independent Administrator of the Estate of Jimmie L. Owens, Deceased)	Levin & Perconti, Susan Novosad	325 North LaSalle Street, Suite 450		Chicago	IL	60654
Top 40 Creditor	PEL/VIP	Raymond Kalinsky	9840 Southwest Highway		Oak Lawn	IL	60453
Counsel for National Fire & Marine Insurance Company and its Affiliated Entities	Phillips, McLaughlin & Hall, P.A.	John C. Phillips, Jr. and David A. Bilson	1200 N. Broom Street		Wilmington	DE	19806
Prepetition Lenders	Pillar Capital Finance LLC	FHA Servicing - Lauri Wrubel	33 Bloomfield Hills Parkway, Suite 125		Bloomfield Hills	MI	48304
Prepetition Lenders	Pillar Capital Finance LLC		8120 Woodmont Avenue, Suite 860		Bethesda	MD	20814
Top 40 Creditor	PIPCO Companies LTD	Steve Ciccirelli	1409 West Altorfer Drive		Peoria	IL	61615
Top 40 Creditor	PointClickCare Technologies Inc	Mary Ann Minto	PO Box 674802		Detroit	MI	48267-4802
Top 40 Creditor	Qureshi, Mary Ellen (Mary Qureshi as Independent Administrator for the Estate of Mary Ellen Qureshi, deceased)	Kralovec, Jambois & Schwartz, Jeffrey Li	60 W Randolph St., 4th Floor		Chicago	IL	60601
Prepetition Lenders, Counsel to Bank of Farmington	Rafool & Bourne	Sumner A. Bourne	401 Main St., Suite 1130		Peoria	IL	61602
Top 40 Creditor	RecoverCare LLC dba Joerns LLC	Melia Crousore	PO Box 936446		Atlanta	GA	31193-6446
Top 40 Creditor	RehabCare (acquired by Select Rehabilitation LLC)	Anna Gardina Wolfe	2600 Compass Road		Glenview	IL	60026
Top 40 Creditor	Rentokil Pest Control	Tyler Shoemaker	PO Box 14095		Reading	PA	19612
Counsel for County Treasurer in and for Rock Island County, Illinois	Rock Island County Treasurer	Austin R. Carlson	1317 3rd Ave., 2nd Floor		Rock Island	IL	61201
Counsel for National Fire & Marine Insurance Company and its Affiliated Entities	Ropers Majeski	Andrew L. Margulis	750 Third Avenue, 25th Floor		New York	NY	10017
Top 40 Creditor	Sage Intacct Inc.	Dept 3237 Irene Aves	PO Box 123237		Dallas	TX	75312-3237
Debtors	SC Healthcare Holding, LLC	c/o Petersen Health Care Management, LLC	830 West Trailcreek Dr.		Peoria	IL	61614
Prepetition Lenders	Secretary of Housing and Urban Development, ATIMA		451 7th Street. SW		Washington	DC	20410
SEC Regional Office	Securities & Exchange Commission	NY Regional Office	Regional Director	100 Pearl St., Suite 20-100	New York	NY	10004-2616
SEC Regional Office	Securities & Exchange Commission	PA Regional Office	Regional Director	One Penn Center 1617 JFK Boulevard Ste 520	Philadelphia	PA	19103
SEC Headquarters	Securities & Exchange Commission	Secretary of the Treasury	100 F St NE		Washington	DC	20549
Top 40 Creditor	Select Rehabilitation LLC	Anna Gardina Wolfe	2600 Compass Road		Glenview	IL	60026

Description	CreditorName	CreditorNoticeName	Address1	Address2	City	State	Zip
Top 40 Creditor	Shiftkey LLC	Ryon Stewart	PO Box 735913		Dallas	TX	75373
Top 40 Creditor	Smith, Russel	Holder Law Group, LLP, Elizabeth Holder	505 W University Ave., #218		Champaign	IL	61820
Top 40 Creditor	SNF Receivable Solutions LLC	Ann Trimble	PO Box 216		Thonotosassa	FL	33592
Prepetition Lenders	Solutions Bank		200 Main Street	PO Box 278	Forreston	IL	61030