

**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)

Hearing Date: May 13-14, 2024 at 9:30 am (ET)

AMENDED WITNESS AND EXHIBIT LIST

The official committee of unsecured creditors (the “Committee”) of SC Healthcare Holding, LLC and its affiliated debtors and debtors-in-possession (the “Debtors”) submits this witness and exhibit list for the hearing scheduled for **May 13-14, 2024** before the Honorable Thomas M. Horan, at the United States Bankruptcy Court for the District of Delaware.

WITNESSES

The Committee designates the following persons as witnesses who may be called at the Hearing:

- (i) Any witnesses deposed in this case;
- (ii) Any witnesses necessary to authenticate a document;
- (iii) Any witness disclosed by and/or called by any other party; and
- (iv) Any impeachment or rebuttal witness.

¹ 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, which are 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 will be made available on a website of the Debtors’ proposed claims and noticing agent at www.kcellc.net/Petersen.



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EXHIBITS

The Committee designates the following exhibits that may be used at the Hearing:

Exhibit No.	Document Description
1	<i>Emergency Motion of X-Caliber Funding LLC to Excuse Receiver's Compliance with 11 U.S.C. § 543(a) & (b)</i> [Docket No. 59] (the " <u>543 Motion</u> ")
2	<i>Emergency Motion of X-Caliber Funding LLC for an Order (I) Dismissing the Subject Chapter 11 Cases, (II) for Abstention, or (III) Appointment of Receiver as the Chapter 11 Trustee</i> [Docket No. 60] (the " <u>Dismissal Motion</u> ," and together with the 543 Motion, the " <u>X-Caliber Motions</u> ")
3	Declaration of Jeff Deines in support of, among other things, the X-Caliber Motions [Docket Nos. 62-63]
4	Declaration of Paige B Tinkham in support of, among other things, the X-Caliber Motions [Docket No. 64]
5	The Committees' omnibus objection to the X-Caliber Motions [Docket No 172]
6	The U.S. Trustee's objection to the Dismissal Motion [Docket No. 170]
7	The U.S. Trustee's objection to the 543 Motion [Docket No. 171]
8	The Debtors' omnibus objection to the X-Caliber Motions [Docket No 13] (the " <u>Debtors' Omnibus Objection</u> ")
9	Declaration of Carrie V. Hardman in support of Debtors' Omnibus Objection [Docket No. 168]
10	Declaration of David Campbell in support of Debtors' Omnibus Objection [Docket No. 167]
11	<i>Declaration of David R. Campbell in Support of Debtors' Chapter 11 Petitions and First Day Pleadings</i> [Docket No. 44]
12	<i>Declaration of David R. Campbell in Support of Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Financing, (II) Granting Security Interests and Superpriority Administrative Expense Status, (III) Granting Adequate Protection to Certain Prepetition Secured Credit Parties, (IV) Modifying the Automatic Stay, (V) Authorizing the Debtors to Enter into Agreements with JMB Capital Partners Lending, LLC, (VI) Authorizing NonConsensual Use of Cash Collateral, (VII) Scheduling a Final Hearing, and (VIII) Granting Related Relief</i> [Docket No. 40]
13	<i>The Official Committee of Unsecured Creditors' First Set of Requests for Production of Documents to X-Caliber Funding LLC</i>
14	<i>X- Caliber Funding LLC's Response to the Official Committee of Unsecured Creditors' First Set of Requests for Production of Documents to X-Caliber Funding LLC</i>
15	X-Caliber's omnibus reply in support of X-Caliber Motions [Docket No. 188]
16	Declaration of Flanagan [Redacted] in support of X-Caliber Motions [Docket No. 191]
17	Declaration of Mark L. Meyers in support of, among other things, Debtors' Omnibus Objection [Docket No. 258]
18	<i>Order Appointing Receiver, Receivership Proceeding</i> [Docket No. 8]

Exhibit No.	Document Description
19	<i>Receiver's Notice of Inventory</i> , Receivership Proceeding [Docket No. 19]
20	<i>Receiver's First Report</i> , Receivership Proceeding [Docket No. 32]
21	January 25, 2024 Receiver Email regarding Insurance (XCal_013363)
22	February 13, 2024 Receiver Email Thread regarding Oasis Outstanding Amounts (MFF_003865)
23	February 28, 2024 Receiver Email regarding Receiver Payments (MFF_006728)
24	March 1, 2024 Martin Bros. Email Thread regarding Payment (MFF_007197)
25	March 7, 2024 Tutura Email Thread regarding Mark Petersen [Deposition]
26	March 13, 2024 One Staff Email regarding Overdue Payments (MFF_014054)
27	March 13, 2024 One Staff Email Thread regarding Payments with Attachments (MFF_013960)
28	March 18, 2024 Receiver Email regarding Transfer Authorization (XCal_009242)
29	March 18, 2024 Tutura Email Thread regarding Oasis Invoices (MFF_008957)
30	March 21, 2024 Tutura Email Thread regarding Premium Installments (MFF_014221)
31	March 27, 2024 Receiver Email regarding Bank Accounts (XCal_014225)
32	March 29, 2024 Martin Bros. Email regarding Past Due with Attachment (MFF_009690)
33	March 29, 2024 Tutura Email Thread regarding Not Entering AP (MFF_014793)
34	April 1, 2024 Tutura Email Thread regarding Martin Bros. Outstanding Amounts (MFF_014865)
35	April 2, 2024 Martin Bros. Email Thread regarding Outstanding Amounts (XCal_014450)
36	April 4, 2024 Martin Bros. Email regarding Invoices with Attachment (MFF_020127)
37	April 14, 2024 X-Caliber Email regarding Commingle (MFF_018691)
38	April 17, 2024 Receiver Email regarding Select Rehab Outstanding Amounts (MFF_015438)
39	April 17, 2024 Receiver Email regarding PLGL Insurance (MFF_010868)
40	April 22, 2024 Tutura Email re Notification Process [Improperly redacted based on assertion of purported Common Interest Privilege between Receiver and X-Caliber] (MFF_015790)
41	Fee & Leasehold Mortgage, Assignment of Leases and Rents and Security Agreement (October 31, 2019)
42	Mark Petersen Guaranty (October 31, 2019)
43	February 2, 2024 Blank Rome Email [Improperly redacted based on assertion of purported Common Interest Privilege between Receiver and X-Caliber] (MFF_016323)
44	February 11, 2024 Blank Rome Email [Improperly redacted based on assertion of purported Common Interest Privilege between Receiver and X-Caliber] (MFF_016394)

Exhibit No.	Document Description
45	February 11, 2024 Receiver Email [Improperly redacted based on assertion of purported Common Interest Privilege between Receiver and X-Caliber] (MFF_013136)
46	February 11, 2024 X-Caliber Email [Improperly redacted based on assertion of purported Common Interest Privilege between Receiver and X-Caliber] (MFF_013130)
47	February 22, 2024 Receiver Email [Improperly redacted based on assertion of purported Common Interest Privilege between Receiver and X-Caliber] (MFF_017536)
48	March 21, 2024 Receiver Email [Improperly redacted based on assertion of purported Common Interest Privilege between Receiver and X-Caliber] (MFF_014253)
49	March 21, 2024 Receiver Email [Improperly redacted based on assertion of purported Common Interest Privilege between Receiver and X-Caliber] (MFF_011468)
50	March 24, 2024 Tutura Email [Improperly redacted based on assertion of purported Common Interest Privilege between Receiver and X-Caliber] (MFF_019134)
51	March 27, 2024 Blank Rome Email [Improperly redacted based on assertion of purported Common Interest Privilege between Receiver and X-Caliber] (MFF_019675)
52	March 29, 2024 Receiver Email [Improperly redacted based on assertion of purported Common Interest Privilege between Receiver and X-Caliber] (MFF_019774)
53	April 9, 2024 Receiver Email [Improperly redacted based on assertion of purported Common Interest Privilege between Receiver and X-Caliber] (MFF_012080)
54	April 10, 2024 Receiver Email [Improperly redacted based on assertion of purported Common Interest Privilege between Receiver and X-Caliber] (MFF_020272)
55	April 12, 2024 Tutura Email [Improperly redacted based on assertion of purported Common Interest Privilege between Receiver and X-Caliber] (MFF_015123)
56	April 17, 2024 Blank Rome Email [Improperly redacted based on assertion of purported Common Interest Privilege between Receiver and X-Caliber] (MFF_020366)
57	April 17, 2024 Receiver Email [Improperly redacted based on assertion of purported Common Interest Privilege between Receiver and X-Caliber] (MFF_015463)
58	April 21, 2024 Blank Rome Email [Improperly redacted based on assertion of purported Common Interest Privilege between Receiver and X-Caliber] (MFF_020607)

Exhibit No.	Document Description
59	April 21, 2024 Receiver Email [Improperly redacted based on assertion of purported Common Interest Privilege between Receiver and X-Caliber] (MFF_015777)
60	April 22, 2024 Blank Rome Email [Improperly redacted based on assertion of purported Common Interest Privilege between Receiver and X-Caliber] (MFF_020628)
61	X-Caliber Advances through May 6, 2024 (XCal_014848)
62	Updated Petersen Interest Calculations through May 7, 2024 (XCal_014849)
63	April 29, 2024 Transcript of Deposition of Mike Flanagan, and all exhibits thereto
64	May 1, 2024 Transcript of Deposition of Ed Smith, and all exhibits thereto
65	May 3, 2024 Transcript of Deposition of Mark L. Myers, and all exhibits thereto
66	April 16, 2024 Transcript of Deposition of David R. Campbell, and all exhibits thereto
	Any other documents produced by X-Caliber (XCal_000001 through XCal_014849)
	Any other documents produced by Receiver (MFF_000001 through MFF_020708).
	Any pleadings, reports, or other documents filed in the Debtors' bankruptcy case.

The Committee also cross designates all exhibits designated by any other party in connection with the Hearing and reserves the use additional exhibits for rebuttal or impeachment purposes. The Committee reserves the right to amend or supplement this witness and exhibit list prior to the Hearing.

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Dated: May 9, 2024
Wilmington, Delaware

Respectfully submitted,

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