

**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 (THM)

Jointly Administered

DEBTORS' NOTICE OF ORAL DEPOSITION OF MICHAEL FLANAGAN

To: Michael Flanagan
c/o Jason R. Sleezer
Scott & Kraus LLC
150 S. Wacker Drive, Suite 2900
Chicago, IL 60606
jsleezer@skcounsel.com

PLEASE TAKE NOTICE that that, pursuant to Rules 26 and 30 of the Federal Rules of Civil Procedure, made applicable to these proceedings by Rules 7026 and 7030 of the Federal Rules of Bankruptcy Procedure, the above-captioned debtors and debtors in possession (collectively, the "Debtors") will take a deposition upon oral examination of the Receiver of the Subject Debtors, Michael Flanagan.

The deposition shall take place on **Monday, April 29, 2024, at 10:00 a.m. (prevailing Eastern Time)** via Zoom. Any parties wishing to participate in the deposition by Zoom shall contact Scott Ahmad, counsel for the Debtors, and Paige Tinkham, counsel to X-Caliber Funding LLC.

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, 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.



2410443240428000000000002

The deposition will take place before a court reporter and will be recorded by stenographic means, may be videotaped, and shall continue from day to day until it has been completed. The deposition may be used for discovery, evidentiary hearings, at the trial of this action or for any other purposes permitted by the Federal Rules of Civil Procedure, the Federal Rules of Bankruptcy Procedure, and under the rules of this Court.

[Remainder of the page intentionally left blank]

Dated: April 26, 2024

WINSTON & STRAWN LLP

/s/ Carrie V. Hardman

Daniel J. McGuire (admitted *pro hac vice*)
Gregory M. Gartland (admitted *pro hac vice*)
35 W. Wacker Drive
Chicago, IL 60601
Telephone: (312) 558-5600
Facsimile: (312) 558-5700
Email: dmcguire@winston.com
Email: ggartland@winston.com

and

Carrie V. Hardman (admitted *pro hac vice*)
200 Park Avenue
New York, New York 10166
Telephone: (212) 294-6700
Facsimile: (212) 294-4700
Email: chardman@winston.com

and

**YOUNG CONAWAY STARGATT &
TAYLOR, LLP**

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
Facsimile: (302) 571-1253
Email: amagaziner@ycst.com
sborovinskaya@ycst.com
ccox@ycst.com

*Counsel for the Debtors and Debtors in
Possession*

Certificate of Service

I hereby certify that on April 26, 2024, I cause a true and correct copy of the following *Debtors' Notice of Oral Deposition of Michael Flanagan* to be served (1) via CM/ECF upon those parties registered to receive such notice in these cases, and (2) via electronic mail upon the following:

BLANK ROME LLP

Lawrence R. Thomas III
Jordan L. Williams
1201 N. Market Street, Suite 800
Wilmington, Delaware 19801
Lorenzo.thomas@blankrome.com
Jordan.williams@blankrome.com
-and-

Kenneth J. Ottaviano
Paige B. Tinkham
444 West Lake Street, Suite 1650
Chicago, Illinois 60606
Ken.Ottaviano@blankrome.com
Paige.Tinkham@blankrome.com

Counsel to X-Caliber Funding LLC

SCOTT & KRAUS LLC

Jason R. Sleezer
150 S. Wacker Drive, Suite 2900
Chicago, IL 60606
jsleezer@skcounsel.com

Counsel to Receiver

OFFICE OF THE UNITED STATES TRUSTEE

Linda Richenderfer
Jon Lipshie
844 King Street, Suite 2207, Lockbox 35
Wilmington, DE 19801
Linda.richenderfer@usdoj.gov
Jon.lipshie@usdoj.gov