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)

Obj. Deadline: May 15, 2024 at 4:00 pm (ET) **Hearing Date**: May 22, 2024 at 10:00 am (ET)

APPLICATION FOR ENTRY FOR AN ORDER AUTHORIZING AND APPROVING THE EMPLOYMENT OF PROVINCE, LLC AS FINANCIAL ADVISOR TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS EFFECTIVE AS OF APRIL 11, 2024

The Official Committee of Unsecured Creditors (the "<u>Committee</u>") of the above-captioned debtors and debtors-in-possession (collectively, the "<u>Debtors</u>") hereby files this application (the "<u>Application</u>") for an order, substantially in the form attached hereto as <u>Exhibit A</u>, pursuant to sections 328(a) and 1103(a) of title 11 of the United States Code (the "<u>Bankruptcy Code</u>"), Rule 2014 of the Federal Rules of Bankruptcy Procedure (the "<u>Bankruptcy Rules</u>"), and Rule 2014-1 of the Local Rules of Bankruptcy Procedure of the United States Bankruptcy Court for the District of Delaware (the "<u>Local Rules</u>") authorizing and approving the employment of Province, LLC ("<u>Province</u>") as financial advisor to the Committee in connection with the Debtors' chapter 11 cases, effective as of April 11, 2024. In support of the Application, the Committee also files the *Declaration of Paul Navid* (the "<u>Navid Declaration</u>"), attached hereto as <u>Exhibit B</u> and incorporated herein by reference. In support of the Application, the Committee respectfully represents as follows:

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.



JURISDICTION AND VENUE

1. Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409 and, in accordance with Local Rule 9013-1(f), the Committee consents to the entry of a final order by the Court, to the extent it is later determined by the Court, that absent consent of the parties, it cannot enter final orders or judgments consistent with Article III of the United States Constitution. This is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2).

2. The statutory predicates for the relief requested herein are sections 328(a) and 1103(a) of the Bankruptcy Code, Bankruptcy Rules 2014, 2016, and 5002, and Local Rule 2014-1.

BACKGROUND

3. On March 20, 2024 (the "<u>Petition Date</u>"), each of the Debtors filed a voluntary petition for relief in this Court under chapter 11 of the Bankruptcy Code. The Debtors continue in possession of their properties and management of their businesses as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee or examiner has been requested or appointed in these cases.

4. The Debtors' cases are being jointly administered for procedural purposes only, pursuant to an order the Court entered on March 22, 2024 [Docket No. 79].

5. On April 9, 2024, the United States Trustee appointed the Committee pursuant to section 1102(a)(1) of the Bankruptcy Code [Docket No. 131]. The Committee currently comprises the following entities and persons: (i) Select Rehabilitation, LLC; (ii) Martin Brothers Distributing Company, Inc.; (iii) Omnicare Inc.; (iv) McKesson Corporation; (v) Onestaff Medical, LLC; (vi) Lawrence Recruiting Specialists, Inc.; and (vii) Darlena Moore, as Independent Administrator of the Estate of Linda I. Johnson.

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6. On April 11, 2024, the Committee selected Province as its proposed financial advisor.

7. Province has extensive experience representing official creditors' committees, debtors, creditors, trustees, and others in a wide variety of bankruptcy cases, including, as (i) financial advisor to the official committees of unsecured creditors of A.B.C. Carpet, AgileThought, Alex and Ani, Armstrong Flooring, Aruze Gaming, Ascena Group, Avadim Health, Barretts Minerals, Benitago, BL Restaurants Holding, Carbonlite Holdings, Cherry Man Industries, Cyprus Mines, David's Bridal, DCL Holdings (USA), Destination Maternity, DirectBuy Home Improvement, Eastern Outfitters, EHT US1 (Eagle Hospitality), Endo International, Francesca's Holding Corporation, Honx, Insys Therapeutics, Independent Pet Partners, Invacare, J Crew, Lucky's Market, L'Occitane, Mallinckrodt, Mariner Health, Mountain Express Oil Company, Nielsen & Bainbridge (NBD Home), Neopharma, Noble House, One Web, Papyrus, Path Medical, Pier 1, PBS Brand Co. (Punch Bowl), Purdue Pharma, Prime Core Technologies, Restoration Forest Products Group, LLC, Reverse Mortgage, Revlon, Sientra, SiO2 Medical Products, Stimwave Technologies, Surgalign, TECT Aerospace Group, The Rockport Company, True Religion Apparel, Tuesday Morning, Virgin Orbit, Water Gremlin, Wesco Aircraft, White Stallion Energy, Whittaker, Clark & Daniels, and Winsor Terrace; (ii) financial advisor to the debtors 4E Brands, Basic Energy Services, Cherry Man Industries, Cinemex Holdings USA, Codiak BioSciences, Coin Cloud, Frontsight Management, Penthouse Global Media, Superior Linen, True Religion Apparel, WeWork and Woodbridge Group of Companies; and (iii) trustee or trustee advisor in Aegean Marine Petroleum, Advance Watch, American Apparel, Aruze, Borden Dairy, CS Mining, Cycle Force, DCL, EBH Topco, Eclipse Berry Farms, Energy & Exploration (ENXP), Fieldwood, Gump's, Invacare, La Paloma Generating Company,

Limetree Bay Services, Invacare, Mallinckrodt, Maxus Energy, Neogenix, PBS Brand Co. (Punch Bowl), Promise Healthcare Group, RadioShack Corporation, RMIT (Reverse Mortgage), Samson Resources, SiO2, Stimwave Technologies, and Vesta Holdings, among others.

RELIEF REQUESTED

8. By this Application, the Committee respectfully requests that the Court enter an order, substantially in the form annexed hereto as **Exhibit A**, pursuant to sections 328(a) and 1103(a) of the Bankruptcy Code, Bankruptcy Rule 2014, and Local Rule 2014-1, authorizing the Committee to employ and retain Province as its financial advisor in these chapter 11 cases. The Committee selected Province in furtherance of the efficient administration of the estates on behalf of the Committee. The Committee seeks to retain Province effective as of April 11, 2024, the date that Province began providing services to the Committee. The Committee believes that such retention is appropriate in these chapter 11 cases because the Committee required Province's assistance prior to such time as a retention application could be submitted to the Court due to the exigencies of these cases.

SCOPE OF EMPLOYMENT

9. Subject to further order of this Court, the services Province has rendered and may be required to render for the Committee, include without limitation, the following:

- a. becoming familiar with and analyzing the Debtors' DIP budget, assets and liabilities, and overall financial condition;
- b. reviewing financial and operational information furnished by the Debtors;
- c. monitoring the sale process, interfacing with the Debtors' professionals, and advising the Committee regarding the process;
- d. scrutinizing the economic terms of various agreements, including, but not limited to, various professional retentions;
- e. analyzing the Debtors' proposed business plans and developing alternative scenarios, if necessary;
- f. assessing the Debtors' various pleadings and proposed treatment of unsecured creditor claims therefrom;

- g. preparing, or reviewing as applicable, avoidance action and claim analyses;
- h. assisting the Committee in reviewing the Debtors' financial reports, including, but not limited to, statements of financial affairs, schedules of assets and liabilities, DIP budgets, and monthly operating reports;
- i. advising the Committee on the current state of these chapter 11 cases;
- j. advising the Committee in negotiations with the Debtors and third parties as necessary;
- k. if necessary, participating as a witness in hearings before the Court with respect to matters upon which Province has provided advice; and
- 1. other activities as are approved by the Committee, the Committee's counsel, and as agreed to by Province.

NO ADVERSE INTEREST OF PROFESSIONALS

10. To the best of the Committee's knowledge and based upon the Navid Declaration attached hereto, neither Province nor any of its employees have any connection with any party in interest, their attorneys or accountants, other than as set forth in the Navid Declaration.

11. To the best of the Committee's knowledge, except as provided in the Navid Declaration, neither Province, nor any of its employees represent any interest adverse to that of the Committee in the matters on which they are to be retained.

12. While Province has undertaken, and continues to undertake, efforts to identify connections with the Debtors and other parties-in-interest, it is possible that connections with some parties-in-interest have not yet been identified. Should Province, through its continuing efforts, learn of any new connections of the nature described above, Province will promptly file supplemental declarations, as required by Bankruptcy Rule 2014(a).

13. Province represents many debtors, trustees, and committees in other bankruptcy cases, and the debtors, the members of those committees, or those estates may be creditors of the Debtors. However, Province will not represent those debtors, committees, or estates with respect to any claims that they may collectively or individually have against the Debtors.

PROFESSIONAL COMPENSATION

14. The Committee desires to employ Province and to have Province compensated with reasonable fees to be determined by the Court. No compensation will be paid to Province except upon compliance with the Bankruptcy Code, Bankruptcy Rules, Local Rules, and any other applicable procedures and orders of this Court. Province has received no retainer in these cases to represent the Committee. Neither the Committee nor any of its members (or their representatives) are or will be liable for any fees or costs incurred by Province in its representation of the Committee. Province's standard hourly rates are:

Professional Level P	
Vice Presidents, Directors, and Senior Directors\$Analysts, Associates, and Senior Associates\$	870-\$1,450 590-\$950 370-\$700 270-\$410

15. The hourly rates set forth above are subject to periodic adjustments to reflect economic and other conditions. Province intends to provide notice to the Debtors, the Committee, and the U.S. Trustee before implementing any increases in Province's rates for professionals working on these chapter 11 cases. Despite the foregoing, as a courtesy to the Committee and estate, Province has agreed to reduce its standard hourly rates on all fees incurred in this matter by 15% (fifteen percent), in the Committee's reasonable discretion.

16. In addition, Province will bill for all out-of-pocket expenses reasonably and actually incurred by Province in connection with the matters contemplated by this Application.

NOTICE

17. Notice of this Application was provided to: (i) the Office of United States Trustee;(ii) the Debtors; (iii) counsel to the Debtors; (iv) the DIP Lender; (v) the Prepetition Lenders; and

(vi) any party requesting notice pursuant to Bankruptcy Rule 2002 at the time of service. The Committee submits that, given the nature of the relief requested, no further notice is necessary.

NO PRIOR REQUEST

18. No prior request for the relief sought herein has been made to this or any other

Court.

[Remainder of page intentionally left blank.]

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CONCLUSION

WHEREFORE, the Committee requests that the Court enter the order (the "<u>Order</u>") annexed hereto as <u>Exhibit A</u>, (i) approving the retention and employment of Province as its financial advisor, effective as April 11, 2024, to render services as described above with compensation to be paid as an administrative expense in such amounts as this Court may hereafter determine and allow; and (ii) grant the Committee such other and further relief as the Court deems just and proper.

Dated: May 1, 2024

THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF SC HEALTHCARE HOLDING, LLC, *ET AL*.

/s/ Jay D. Mitchell

Jay D. Mitchell, solely in his capacity as authorized representative for Lawrence Recruiting Specialists, Inc., Chairperson of the Official Committee of Unsecured Creditors of SC Healthcare Holding, LLC, *et al.*, and not in any other capacity

EXHIBIT A

Proposed Order

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)

Ref Docket No.

ORDER AUTHORIZING AND APPROVING THE EMPLOYMENT OF PROVINCE, LLC AS FINANCIAL ADVISOR TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS <u>EFFECTIVE AS OF APRIL 11, 2024</u>

This matter came before the Court on the Application for Entry of an Order Authorizing and Approving the Employment of Province, LLC as Financial Advisor to the Official Committee of Unsecured Creditors Effective as of April 11, 2024 (the "Application")² and the Declaration of Paul Navid filed in support of the Application (the "Navid Declaration") both filed by the Official Committee of Unsecured Creditors (the "<u>Committee</u>") of the above-captioned debtors and debtorsin-possession, pursuant to sections 328(a) and 1103(a) Title 11 of the United States Code (the "<u>Bankruptcy Code</u>"), Rule 2014 of the Federal Rules of Bankruptcy Procedure (the "<u>Bankruptcy</u> <u>Rules</u>"), and Rule 2014-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the "<u>Local Rules</u>") for an order authorizing and approving the retention and employment of Province, LLC ("<u>Province</u>") as financial advisor for the Committee in these chapter 11 cases; and the Court having jurisdiction to consider the

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² Capitalized terms not otherwise defined herein shall have the meanings and definitions ascribed to such terms in the Application.

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Application and the relief requested therein in accordance with 28 U.S.C. § 1334; and consideration of the Application and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Application having been provided, and it appearing that no other or further notice need be provided; and it appearing to the Court that the said Application should be approved, it is, therefore, ORDERED that:

1. The Application is granted as set forth herein.

2. Pursuant to sections 328 and 1103 of the Bankruptcy Code, Bankruptcy Rule 2014, and Local Rule 2014-1, the Committee is authorized to employ and retain Province as financial advisor to the Committee effective as of April 11, 2024.

3. Province shall apply for compensation for professional services rendered and reimbursement of expenses reasonably and actually incurred in connection with the Debtors' cases as set forth in the Application and in compliance with the applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and any other applicable procedures and orders of this Court.

4. Notwithstanding anything to the contrary in the Application or the Navid Declaration, Province shall not seek reimbursement of any fees or costs arising from the defense of any of Province's fee applications in these chapter 11 cases.

5. Notwithstanding anything in the Application to the contrary, Province shall (i) to the extent that it uses the services of independent contractors or subcontractors (collectively, the "<u>Contractors</u>") in these cases, pass through the cost of such Contractors at the same rate that Province pays the Contractors; (ii) seek reimbursement for actual costs only; (iii) ensure that the

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Contractors are subject to the same conflicts checks as required for Province; and (iv) file with this Court such disclosures required by Bankruptcy Rule 2014.

6. The Committee and Province are authorized and empowered to take all actions necessary to implement the relief granted in this Order.

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

EXHIBIT B

Declaration of Paul Navid

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)

DECLARATION OF PAUL NAVID IN SUPPORT OF APPLICATION FOR ENTRY OF AN ORDER AUTHORIZING AND APPROVING THE EMPLOYMENT OF PROVINCE, LLC AS FINANCIAL ADVISOR TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS <u>EFFECTIVE AS OF APRIL 11, 2024</u>

I, Paul Navid, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 and pursuant to Rules 2014(a) and 2016(b) of the Federal Rules of Bankruptcy Procedure and Rule 2014-1 of the Local Rules as follows:

1. I am a Managing Director with Province, LLC ("<u>Province</u>"), which is a financial advisory firm with its principal office located at 2360 Corporate Circle, Suite 340, Henderson, Nevada 89074. Province also has offices in the Greenwich, Los Angeles, Miami and New York metro areas. I am authorized to submit this declaration (the "<u>Declaration</u>") in support of the *Application for Entry of an Order Authorizing and Approving the Employment of Province, LLC as Financial Advisor to the Official Committee of Unsecured Creditors Effective as of April 11, 2024* (the "Application").

2. Province's corporate structure, including its parent entities, affiliates, and subsidiaries, is as follows: Province, LLC is a Delaware limited liability company, and Province's

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sole subsidiary, which is wholly owned, is Province Fiduciary Services, LLC, a Nevada limited liability company. All of the membership interests in Province, LLC are held by Province Holdings, Inc., a Delaware corporation ("<u>Holdco</u>"), and Province Management, LLC, a Delaware limited liability company ("<u>Management Holdco</u>"). Neither Holdco, Management Holdco, nor any Province subsidiary (i) has any employees, (ii) has any connection to the Debtors or any person listed on the Entity List (defined below), (iii) has any physical or electronic access to Province's physical or electronically stored information; (iv) will be involved in this engagement; nor (v) have they been engaged to advise the Debtors, the Official Committee of Unsecured Creditors (the "<u>Committee</u>"), or any other party in interest in connection with these chapter 11 proceedings. Additionally, all Province conflicts checks and related disclosures include any connections of each of Province's subsidiary, Holdco, and Management Holdco.

3. Neither I, Province, nor any employee thereof, insofar as I have been able to ascertain, has any connection with the Debtors, their creditors, or any other parties in interest herein, or their respective attorneys and accountants, the U.S. Trustee, or any person employed in the office of the U.S. Trustee, except as set forth herein.

4. This Declaration is submitted pursuant to sections 328 and 1103 of Title 11 of the United States Code (the "<u>Bankruptcy Code</u>"), Rules 2014 and 2016 of the Federal Rules of Bankruptcy Procedure (the "<u>Bankruptcy Rules</u>"), and Rules 2014-1 and 2016-1 of the Local Bankruptcy Rules of the United States Bankruptcy Court for the District of Delaware (the "<u>Local Bankruptcy Rules</u>") in support of the Application for the entry of an order approving the retention of Province as financial advisor to the Committee, effective April 11, 2024.

5. In connection with its proposed retention by the Committee in these chapter 11 cases and in preparing this Declaration, Province used a set of procedures developed to ensure

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compliance with the requirements of the Bankruptcy Code and the Federal and Local Bankruptcy Rules regarding the retention of professionals (the "<u>Retention Procedures</u>"). Pursuant to the Retention Procedures, and under my direction and supervision, Province researched its client connections database, which includes all engagements that concluded within the past twenty-four (24) months, to determine whether it has relationships with any of the entities that were identified to Province as creditors or parties-in-interest in these chapter 11 cases (the "<u>Entity List</u>") a copy which is attached hereto as **Schedule 1**. To the extent such a search indicated that Province has a relationship with any of the entities on the Entity List, the identities of such entities and Province's relationship with such entities is disclosed in the attached **Schedule 2**.

6. Province sent an email questionnaire to each employee inquiring as to whether each employee or any member(s) of his or her household:

- i. owns any debt or equity securities of the Debtors or their non-debtor affiliates;
- ii. holds a claim against or interest adverse to the Debtors or their non-debtor affiliates;
- iii. is or was an officer, director, or employee of the Debtors or their non-debtor affiliates;
- iv. is related to or has any connections to any Bankruptcy Judge in the United States Bankruptcy Court for the District of Delaware;
- v. is related to or has any connections to anyone working in the Office of the United States Trustee for the District of Delaware;
- vi. was an officer, director or employee of the Debtors within two years prior to the Petition Date; or
- vii. has a connection with a party in interest listed on the Entity List.
- 7. Province did not receive any responses to the above inquiry.

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8. Based on the result of that search and employee questionnaire, I have been able to ascertain after diligent inquiry that to the best of my knowledge, Province (i) does not represent any entity having an adverse interest in connection with these chapter 11 cases and (ii) does not represent or hold an interest adverse to the interest of the Debtors or their estates with respect to the matters on which Province is to be employed. Moreover, Province and its subsidiaries are disinterested within the meaning of section 101(14) of the Bankruptcy Code, in that neither I, Province, any Province subsidiary, nor any of their principals, employees (including those working on this engagement) or associates:

- a. are creditors, equity security holders or insiders of the Debtors;
- b. are or were within two years before the Petition Date, a director, officer or employee of the Debtors;
- c. 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; or
- d. hold any debt or equity securities of the Debtors.

9. As a part of Province's financial advisory practice, Province's clientele includes: debtors, creditors and other statutory committees, institutional creditors, asset purchasers, venture capitalists, secured parties, lessors, contract parties, equity holders, directors and officers, court-appointed fiduciaries, plan sponsors, indenture trustees, and bond insurers. The Debtors have numerous creditors and other parties-in-interest. Province may have in the past represented, and may presently or in the future represent or be deemed adverse to, creditors or parties-in-interest in addition to those specifically disclosed in **Schedule 2** in matters unrelated to these chapter 11 cases. Province believes that its representation of such creditors or other parties in such other

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matters has not affected and will not affect its representation of the Committee in these proceedings.

10. Except as otherwise set forth herein and in **Schedule 2**, insofar as I have been able to ascertain, the principals, associates and staff members of Province do not have any connection with the Debtors, the Debtors' officers and directors, the Debtors' creditors, the Debtors' equity security holders and other known parties-in-interests or their respective professionals.

11. To the best of my knowledge, information and belief formed after reasonable inquiry, neither I, nor any principal, associate or staff member of Province, insofar as I have been able to ascertain, is related to the bankruptcy judge assigned to the above-captioned chapter 11 cases.

12. To the best of my knowledge, information and belief formed after reasonable inquiry, neither I, nor any principal, associate or staff member of Province, insofar as I have been able to ascertain, has a connection to the United States Trustee or any person employed in the office of the United States Trustee.

13. Despite the substantial efforts described above to identify and disclose potential conflicts and connections with parties-in-interest in these cases, neither I nor Province is able to conclusively identify all potential relationships or state with absolute certainty that every client representation or other connection of Province has been disclosed. To the extent Province discovers any facts or additional information during the period of Province's retention that requires disclosure, Province will supplement this Declaration to disclose such information.

14. Province has neither received any retainer nor any payment from the Debtors nor the Committee, nor has it received any promise of payment, during the one-year period prior to the filing of the Debtors' petition. No compensation has been paid or promised to be paid from a

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source other than the Debtors' estates in these chapter 11 cases. No promises have been received by Province nor by any advisors or attorneys thereof as to compensation in connection with these chapter 11 cases other than in accordance with the provisions of the Bankruptcy Code. Province has no agreement with any other entity to share with such entity any compensation received by Province in connection with these chapter 11 cases, except among employees of Province. Neither the Committee nor its members (or any of their representatives) are or will be liable for fees or costs incurred by Province in its representation of the Committee.

15. Province intends to apply for compensation for professional services rendered in connection with these chapter 11 cases subject to approval of this Court as stated in the Application, and in compliance with applicable provisions of the Bankruptcy Code, on an hourly basis, plus reimbursement of actual, necessary expenses and other charges incurred by Province.

16. Province's standard hourly rates are:

Professional Level	<u>Per Hour (USD)</u>
Managing Directors and Principals	\$870-\$1,450
Vice Presidents, Directors, and Senior Directors	\$690-\$950
Analysts, Associates, and Senior Associates	\$370-\$700
Analysts, Associates, and Senior Associates	\$370-\$700
Other / Para-Professional	\$270-\$410

17. The hourly rates set forth above are subject to periodic adjustments to reflect economic and other conditions. Province intends to provide notice to the Debtors, the Committee, and the U.S. Trustee before implementing any increases in Province's rates for professionals working on these chapter 11 cases. Despite the foregoing, as a courtesy to the Committee and estates, Province has agreed to reduce its standard hourly rates on all fees incurred in this matter by 15% (fifteen percent), in the Committee's reasonable discretion.

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18. In addition to the fees described above, Province will bill for all out-of-pocket expenses reasonably and actually incurred by Province in connection with the matters contemplated by this Application.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 1 2024

By: <u>/s/Paul Navid</u> Paul Navid, Managing Director

<u>Schedule 1</u> Conflicts Search List

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

Debtors' Advisors

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

Officers and Directors

Mark Petersen Marikay Snyder David R. Campbell

Insurance Providers

Addison Insurance Company Artisian 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

<u>Judges</u>

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.

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

Litigation Parties

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 Smit** Select Rehabilitation Wynona Alvord X-Caliber Capital, LLC X-Caliber Funding LLC Zawadi Nursing Agency

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) 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 & Rehablitation 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

Office of the United States Trustee

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.

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

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

Schedule 2

Identified Connections (All are matters unrelated to these Cases)

Party	Connection Role	
AT&T	UCC Member in prior	
	Committee engagement	
Select Rehabilitation LLC	UCC Member in prior	
	Committee engagement	
UBS	Professional	
Winston & Strawn LLP	Professional	
Young Conaway Stargatt &	Professional	
Taylor, LLP		

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)

Obj. Deadline: May 15, 2024 at 4:00 pm (ET) **Hearing Date**: May 22, 2024 at 10:00 am (ET)

NOTICE OF APPLICATION FOR ENTRY FOR AN ORDER AUTHORIZING AND APPROVING THE EMPLOYMENT OF PROVINCE, LLC AS FINANCIAL ADVISOR TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS EFFECTIVE AS OF APRIL 11, 2024

PLEASE TAKE NOTICE that on May 1, 2024, the Official Committee of Unsecured Creditors appointed in the above-captioned cases has filed the *Application for Entry for an Order Authorizing and Approving the Employment of Province, LLC as Financial Advisor to the Official Committee of Unsecured Creditors Effective as of April 11, 2024* (the "<u>Application</u>").

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Application must be in writing, filed with the Clerk of the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801, and served upon the undersigned proposed counsel and received **on or before May 15, 2024, AT 4:00 p.m. (EST)**.

PLEASE TAKE FURTHER NOTICE THAT A HEARING ON THE APPLICATION WILL BE HELD ON **MAY 22, 2024, AT 10:00 A.M. (EST)** BEFORE THE HONORABLE THOMAS M. HORAN, UNITED STATES BANKRUPTCY COURT JUDGE FOR THE DISTRICT OF DELAWARE, UNITED STATES BANKRUPTCY COURT, 824 NORTH

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.

MARKET STREET, 3RD FLOOR, COURTROOM NO. 7, WILMINGTON, DELAWARE

19801.

Dated: May 1, 2024

GREENBERG TRAURIG, LLP

/s/ Dennis A. Meloro Dennis A. Meloro (No. 4435) 222 Delaware Avenue, Suite 1600 Wilmington, DE 19801 Telephone: (302) 661-7000 Facsimile: (302) 661-7360 Email: MeloroD@gtlaw.com

-and-

Nancy A. Peterman (admitted *pro hac vice*) Danny Duerdoth (admitted *pro hac vice*) 77 West Wacker Drive, Suite 3100 Chicago, IL 60601 Telephone: (312) 456-8400 Facsimile: (312) 456-8435 Emails: PetermanN@gtlaw.com Duerdothd@gtlaw.com

Proposed Counsel for the Official Committee of Unsecured Creditors