

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)

(Joint Administration Requested)

**NOTICE OF (I) FILING OF BANKRUPTCY PETITIONS AND RELATED
DOCUMENTS AND (II) AGENDA FOR HYBRID HEARING ON FIRST DAY
MOTIONS SCHEDULED FOR MARCH 22, 2024, 2024 AT 2:00 P.M. (ET)
BEFORE THE HONORABLE THOMAS M. HORAN OF THE UNITED STATES
BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE²**

This proceeding will be conducted in-person and via Zoom. All counsel and witnesses are expected to attend unless permitted to appear remotely via Zoom. Please refer to Judge Horan's Chambers Procedures and the Court's website (<http://www.deb.uscourts.gov/ecourt-appearances>) for information on who may participate remotely, the method of allowed participation (video or audio), Judge Horan's expectations of remote participants, and the advance registration requirements. Registration is required by March 21, 2024 at 4:00 p.m. (Eastern time) the business day before the hearing unless otherwise noticed using the eCourt Appearances tool available on the Court's website.

**YOU MUST USE YOUR FULL NAME WHEN LOGGING INTO ZOOM OR YOU WILL
NOT BE ALLOWED INTO THE MEETING**

PLEASE TAKE NOTICE that, on March 20, 2024, the above-captioned debtors and debtors in possession (collectively, the "Debtors") filed voluntary petitions (the "Petitions") for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the "Bankruptcy Code"), and related pleadings with the Clerk of the United States Bankruptcy Court for the District of Delaware. The Debtors continue to operate their businesses as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

PETITION AND RELATED PLEADINGS

1. Voluntary Petitions

A. See **Schedule 1**, attached hereto

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, for which the Debtors have requested joint administration, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information will be made available on a website of the Debtors' proposed claims and noticing agent at <https://www.kccllc.net/Petersen>.

² All motions and other pleadings referenced herein are available online at <https://www.kccllc.net/Petersen> or by request to the Debtors' proposed counsel, Young Conaway Stargatt & Taylor, LLP, Attn: Debbie Laskin, paralegal, 302-571-6710, or dlaskin@ycst.com.



2. Declaration of David R. Campbell in Support of Chapter 11 Petitions and First Day Pleadings [[D.I. 44, 3/21/24](#)]³

PLEASE TAKE FURTHER NOTICE that a hearing with respect to the following first day motions (collectively, the “**First Day Motions**”) is scheduled for **March 22, 2024 at 2:00 p.m. (ET)** (the “**First Day Hearing**”) before The Honorable Thomas M. Horan, United States Bankruptcy Judge for the District of Delaware.

FIRST DAY MOTIONS GOING FORWARD

3. Debtors’ Motion for Entry of an Order, Pursuant to Bankruptcy Rule 1015 and Local Rule 1015-1, (I) Directing Joint Administration of Their Related Chapter 11 Cases (II) Modifying the Requirements for Filing Monthly Operating Reports, and (III) Granting Related Relief [[D.I. 2, 3/20/24](#)]

Status: This matter will be going forward.

4. Debtors’ Motion for Entry of an Order (I) Authorizing the Debtors to File (A) A Consolidated Master List of Creditors and (B) A Consolidated List of the Debtors’ 40 Largest General Unsecured Creditors, (II) Authorizing the Debtors to Redact Personally Identifiable Information for Certain Individual Creditors and Parties in Interest, (III) Authorizing Procedures to Maintain and Protect Confidential Resident Information, and (IV) Granting Related Relief [[D.I. 3, 3/20/24](#)]

Status: This matter will be going forward.

5. Debtors’ Application for Entry of an Order Authorizing the Debtors to Employ and Retain Kurtzman Carson Consultants LLC as Claims and Noticing Agent Effective as of the Petition Date Pursuant to 28 U.S.C § 156(c), 11 U.S.C. § 105(a) and Local Rule 2002-1(f) [[D.I. 6, 3/20/24](#)]

Status: This matter will be going forward.

6. Debtors’ Motion for Entry of Interim and Final Orders (I) Prohibiting Utility Companies from Discontinuing, Altering, or Refusing Service, (II) Deeming Utility Companies to Have Adequate Assurance of Future Payment, (III) Establishing Procedures for Resolving Requests for Additional Assurance, and (IV) Granting Related Relief [[D.I. 7, 3/20/24](#)]

Status: This matter will be going forward.

7. Debtors’ Motion for Entry of an Order (I) Authorizing the Debtors to (A) Continue Insurance Coverage Entered Into Prepetition and Satisfy Prepetition Obligations Related Thereto, (B) Renew, Amend, Supplement, Extend, or Purchase Insurance Policies, (C) Honor the Terms of the Premium Financing Agreement and Pay Premiums Thereunder, (D) Enter Into New Premium Finance Agreements in the Ordinary Course of Business, and (E) Maintain the Surety Bonds; (II) Authorizing Banks to Honor and Process Check and

³ The physical location of the declarant is Peoria, Illinois.

Electronic Transfer Requests Related Thereto; and (III) Granting Related Relief [[D.I. 8, 3/20/24](#)]

Status: This matter will be going forward.

8. Debtors' Motion for Entry of Interim and Final Orders (A) Authorizing the Debtors to Pay Prepetition Taxes and Fees in the Ordinary Course of Business, and (B) Granting Related Relief [[D.I.10, 3/21/24](#)]

Status: This matter will be going forward.

9. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Prepetition Claims of Certain Critical Vendors and (II) Granting Related Relief [[D.I. 26, 3/21/24](#)]

Status: This matter will be going forward.

10. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Pay Prepetition Wages, Salaries, Other Compensation, and Reimbursable Expenses and (B) Continue Employee Benefits Programs and (II) Granting Related Relief [[D.I. 27, 3/21/24](#)]

Status: This matter will be going forward.

11. 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 Non-Consensual Use of Cash Collateral, (VII) Scheduling a Final Hearing, and (VIII) Granting Related Relief [[D.I. 38, 3/21/24](#)]

Related Documents:

- A. Declaration of Luke Andrews 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 Non-Consensual Use of Cash Collateral, (VII) Scheduling a Final Hearing, and (VIII) Granting Related Relief [[D.I. 39, 3/21/24](#)]
- B. 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

Non-Consensual Use of Cash Collateral, (VII) Scheduling a Final Hearing, and (VIII) Granting Related Relief [[D.I. 40, 3/21/24](#)]

Status: This matter will be going forward.

12. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue to Use Their Bank Accounts, (B) Honor Prepetition Obligations Related Thereto, (C) Maintain the Refund Programs, (D) Perform Intercompany Transactions, (E) Maintain Existing Business Forms; and (II) Granting Related Relief [[D.I. 41, 3/21/24](#)]

Status: This matter will be going forward.

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PLEASE TAKE FURTHER NOTICE that objections, if any, to the First Day Motions may be made at the First Day Hearing.

Dated: March 21, 2024
Wilmington, Delaware

Respectfully submitted,

**YOUNG CONAWAY STARGATT &
TAYLOR, LLP**

/s/ Carol E. Cox

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*Proposed Counsel for the Debtors and
Debtors in Possession*

SCHEDULE 1**List of Debtors**

| No. | Entity Name | Federal Employer Identification Number (EIN) If Available | Case No. |
|------------|-------------------------------|--|-----------------|
| 1. | Aledo HCO, LLC | 37-1958952 | 24-10445 |
| 2. | Aledo RE, LLC | 84-2882941 | 24-10447 |
| 3. | Arcola HCO, LLC | 38-4133702 | 24-10449 |
| 4. | Arcola RE, LLC | 84-2897485 | 24-10451 |
| 5. | Aspen HCO, LLC | 61-1951298 | 24-10453 |
| 6. | Aspen RE, LLC | 84-2909991 | 24-10456 |
| 7. | Bement HCO, LLC | 30-1213830 | 24-10458 |
| 8. | Bement RE, LLC | 84-2928509 | 24-10461 |
| 9. | Betty's Garden HCO, LLC | 84-4816013 | 24-10465 |
| 10. | Betty's Garden RE, LLC | 84-4829579 | 24-10467 |
| 11. | Bradford AL RE, LLC | 84-2959125 | 24-10472 |
| 12. | Bushnell AL RE, LLC | 84-2972862 | 24-10476 |
| 13. | Casey HCO, LLC | 84-2841325 | 24-10480 |
| 14. | Collinsville HCO, LLC | 32-0615702 | 24-10482 |
| 15. | Collinsville RE, LLC | 84-2944240 | 24-10486 |
| 16. | CYE Bradford HCO, LLC | 35-2678010 | 24-10487 |
| 17. | CYE Bushnell HCO, LLC | 36-4954875 | 24-10489 |
| 18. | CYE Girard HCO, LLC | 87-1840478 | 24-10581 |
| 19. | CYE Sullivan HCO, LLC | 37-1958957 | 24-10514 |
| 20. | CYE Walcott HCO, LLC | 38-4133707 | 24-10518 |
| 21. | CYV Kewanee AL RE, LLC | 84-3551424 | 24-10522 |
| 22. | Decatur HCO, LLC | 61-1951302 | 24-10525 |
| 23. | Decatur RE, LLC | 84-3018482 | 24-10533 |
| 24. | Eastview HCO, LLC | 30-1213832 | 24-10539 |
| 25. | Eastview RE, LLC | 84-3033493 | 24-10540 |
| 26. | Effingham HCO, LLC | 32-0615705 | 24-10543 |
| 27. | Effingham RE, LLC | 84-3046989 | 24-10546 |
| 28. | Havana HCO, LLC | 35-2678014 | 24-10568 |
| 29. | Havana RE, LLC | 84-3064965 | 24-10572 |
| 30. | Jonesboro, LLC | 30-0760183 | 24-10575 |
| 31. | Kewanee HCO, LLC | 84-2846119 | 24-10578 |
| 32. | Kewanee, LLC | 32-0397428 | 24-10580 |
| 33. | Knoxville & Pennsylvania, LLC | 87-3666370 | 24-10577 |
| 34. | Lebanon HCO, LLC | 36-4954883 | 24-10574 |
| 35. | Lebanon RE, LLC | 84-3096505 | 24-10446 |
| 36. | Macomb, LLC | 61-1705948 | 24-10464 |
| 37. | MBP Partner, LLC | N/A | 24-10483 |

| No. | Entity Name | Federal Employer Identification Number (EIN) If Available | Case No. |
|------------|---|--|-----------------|
| 38. | McLeansboro HCO, LLC | 37-1958962 | 24-10582 |
| 39. | McLeansboro RE, LLC | 84-3111318 | 24-10448 |
| 40. | Midwest Health Operations, LLC | 26-4230617 | 24-10452 |
| 41. | Midwest Health Properties, LLC | 26-4175080 | 24-10455 |
| 42. | North Aurora HCO, LLC | 84-2866215 | 24-10460 |
| 43. | North Aurora, LLC | 30-0760477 | 24-10463 |
| 44. | Petersen 23, LLC | 46-0587947 | 24-10466 |
| 45. | Petersen 25, LLC | 46-0598843 | 24-10470 |
| 46. | Petersen 26, LLC | 46-0607608 | 24-10473 |
| 47. | Petersen 27, LLC | 46-0616994 | 24-10477 |
| 48. | Petersen 29, LLC | 46-0634866 | 24-10481 |
| 49. | Petersen 30, LLC | 46-0649755 | 24-10485 |
| 50. | Petersen Farmer City, LLC | 26-0232140 | 24-10488 |
| 51. | Petersen Health & Wellness, LLC | 46-1968062 | 24-10490 |
| 52. | Petersen Health Business, LLC | 47-3079352 | 24-10492 |
| 53. | Petersen Health Care - Farmer City, LLC | 26-0232003 | 24-10494 |
| 54. | Petersen Health Care - Illini, LLC | 26-0232314 | 24-10497 |
| 55. | Petersen Health Care - Roseville, LLC | 27-1255961 | 24-10500 |
| 56. | Petersen Health Care II, Inc. | 74-3055934 | 24-10502 |
| 57. | Petersen Health Care III, LLC | 20-2865989 | 24-10504 |
| 58. | Petersen Health Care Management, LLC | 36-4719578 | 24-10571 |
| 59. | Petersen Health Care V, LLC | 26-1834665 | 24-10507 |
| 60. | Petersen Health Care VII, LLC | 26-3843133 | 24-10509 |
| 61. | Petersen Health Care VIII, LLC | 20-8981354 | 24-10512 |
| 62. | Petersen Health Care X, LLC | 27-0375868 | 24-10515 |
| 63. | Petersen Health Care XI, LLC | 47-3170495 | 24-10519 |
| 64. | Petersen Health Care XIII, LLC | 81-1106133 | 24-10524 |
| 65. | Petersen Health Care, Inc. | 37-1068286 | 24-10528 |
| 66. | Petersen Health Enterprises, LLC | 20-0349783 | 24-10531 |
| 67. | Petersen Health Group, LLC | 47-4867337 | 24-10534 |
| 68. | Petersen Health Network, LLC | 27-0376016 | 24-10537 |
| 69. | Petersen Health Properties, LLC | 46-2803900 | 24-10541 |
| 70. | Petersen Health Quality, LLC | 46-1980496 | 24-10545 |
| 71. | Petersen Health Systems, Inc. | 30-0174073 | 24-10563 |
| 72. | Petersen Management Company, LLC | 46-1000637 | 24-10583 |
| 73. | Petersen MT, LLC | 46-0997351 | 24-10566 |
| 74. | Petersen MT3, LLC | 81-1018960 | 24-10567 |

| No. | Entity Name | Federal Employer Identification Number (EIN) If Available | Case No. |
|------------|----------------------------|--|-----------------|
| 75. | Petersen MT4, LLC | 86-3079508 | 24-10569 |
| 76. | Petersen Roseville, LLC | 27-1255872 | 24-10570 |
| 77. | Piper HCO, LLC | 38-4133714 | 24-10573 |
| 78. | Piper RE, LLC | 84-3141268 | 24-10491 |
| 79. | Pleasant View HCO, LLC | 61-1951306 | 24-10495 |
| 80. | Pleasant View RE, LLC | 84-3157559 | 24-10499 |
| 81. | Prairie City HCO, LLC | 30-1213838 | 24-10511 |
| 82. | Prairie City RE, LLC | 32-0615676 | 24-10513 |
| 83. | Robings HCO, LLC | 32-0615710 | 24-10517 |
| 84. | Robings, LLC | 32-0397435 | 24-10521 |
| 85. | Rosiclare HCO, LLC | 35-2678017 | 24-10526 |
| 86. | Rosiclare RE, LLC | 84-3172615 | 24-10530 |
| 87. | Royal HCO, LLC | 36-4954885 | 24-10536 |
| 88. | Royal RE, LLC | 84-3187273 | 24-10548 |
| 89. | SABL, LLC | 36-4954872 | 24-10584 |
| 90. | SC Healthcare Holding, LLC | 84-3782584 | 24-10443 |
| 91. | Shangri La HCO, LLC | 35-2677982 | 24-10551 |
| 92. | Shangri La RE, LLC | 84-3367222 | 24-10554 |
| 93. | Shelbyville HCO, LLC | 38-4133674 | 24-10558 |
| 94. | Shelbyville RE, LLC | 84-3371534 | 24-10561 |
| 95. | SJL Health Systems, Inc. | 43-1710785 | 24-10564 |
| 96. | South Elgin, LLC | 37-1711274 | 24-10462 |
| 97. | Sullivan AL RE, LLC | 84-2982014 | 24-10468 |
| 98. | Sullivan HCO, LLC | 61-1951267 | 24-10475 |
| 99. | Sullivan RE, LLC | 84-3388115 | 24-10478 |
| 100. | Swansea HCO, LLC | 30-1213802 | 24-10484 |
| 101. | Swansea RE, LLC | 84-3404166 | 24-10516 |
| 102. | Tarkio HCO, LLC | 32-0615670 | 24-10520 |
| 103. | Tarkio RE, LLC | 84-3417034 | 24-10523 |
| 104. | Tuscola HCO, LLC | 35-2677979 | 24-10527 |
| 105. | Tuscola RE, LLC | 84-3434398 | 24-10529 |
| 106. | Twin HCO, LLC | 36-4954842 | 24-10532 |
| 107. | Twin RE, LLC | 84-3450504 | 24-10535 |
| 108. | Vandalia HCO, LLC | 37-1958927 | 24-10538 |
| 109. | Vandalia RE, LLC | 84-3465519 | 24-10542 |
| 110. | Village Kewanee HCO, LLC | 61-1951269 | 24-10544 |
| 111. | Walcott AL RE, LLC | 84-3002109 | 24-10547 |
| 112. | War Drive, LLC | 88-2667239 | 24-10444 |
| 113. | Watseka HCO, LLC | 30-1213803 | 24-10550 |
| 114. | Watseka RE, LLC | 84-3480175 | 24-10552 |
| 115. | Westside HCO, LLC | 32-0615673 | 24-10555 |

| No. | Entity Name | Federal Employer Identification Number (EIN) If Available | Case No. |
|------------|--------------------------|--|-----------------|
| 116. | Westside RE, LLC | 84-3492922 | 24-10557 |
| 117. | XCH, LLC | 32-0615696 | 24-10560 |
| 118. | CYE Kewanee HCO, LLC | 84-2039756 | 24-10496 |
| 119. | CYE Kewanee- PHC, Inc. | 84-3322428 | 24-10493 |
| 120. | CYE Knoxville - PHC, Inc | 84-3292643 | 24-10498 |
| 121. | CYE Knoxville HCO, LLC | 84-2049047 | 24-10501 |
| 122. | CYE Monmouth - PHC, Inc | 84-3307613 | 24-10506 |
| 123. | CYE Monmouth HCO, LLC | 84-2081064 | 24-10510 |
| 124. | El Paso - PHC, Inc | 84-3232890 | 24-10549 |
| 125. | El Paso HCC, LLC | 84-1799008 | 24-10553 |
| 126. | El Paso HCO, LLC | 84-1977403 | 24-10556 |
| 127. | Flanagan - PHC, Inc. | 84-3247972 | 24-10559 |
| 128. | Flanagan HCC, LLC | 84-1729655 | 24-10562 |
| 129. | Flanagan HCO, LLC | 84-1988199 | 24-10565 |
| 130. | Kewanee AL, LLC | 84-2156306 | 24-10576 |
| 131. | Knoxville AL, LLC | 84-2168982 | 24-10579 |
| 132. | Legacy - PHC Inc. | 84-3336567 | 24-10450 |
| 133. | Legacy Estates AL, LLC | 84-2183672 | 24-10454 |
| 134. | Legacy HCO, LLC | 84-2062199 | 24-10459 |
| 135. | Marigold - PHC Inc | 84-3262379 | 24-10471 |
| 136. | Marigold HCC, LLC | 84-1746552 | 24-10474 |
| 137. | Marigold HCO, LLC | 84-2003234 | 24-10479 |
| 138. | Monmouth AL, LLC | 84-2199049 | 24-10457 |
| 139. | Polo - PHC, Inc. | 84-3275329 | 24-10503 |
| 140. | Polo HCO, LLC | 84-2021222 | 24-10505 |
| 141. | Polo, LLC | 84-1764489 | 24-10508 |