

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

In re:	)	Chapter 11
	)	
GULF COAST HEALTH CARE, LLC, <i>et al.</i> , <sup>1</sup>	)	Case No. 21-11336 (KBO)
	)	
Debtors.	)	Jointly Administered
	)	
	)	<b>Obj. Deadline: 11/17/21 at 4:00 p.m. (ET)</b>
	)	<b>Hrg. Date: 11/23/21 at 10:00 a.m. (ET)</b>

**NOTICE OF HEARING ON MOTION OF DEBTORS FOR ENTRY  
OF AN ORDER (I) AUTHORIZING TRANSFER OF THE MANAGEMENT,  
OPERATIONS, AND RELATED ASSETS OF THE OMEGA FACILITIES FREE  
AND CLEAR OF ALL LIENS, CLAIMS, ENCUMBRANCES, AND INTERESTS;  
(II) APPROVING PROCEDURES FOR THE DEBTORS' FUTURE  
ASSUMPTION AND ASSIGNMENT OF CERTAIN EXECUTORY CONTRACTS  
AND UNEXPIRED LEASES; (III) APPROVING REJECTION AND  
TERMINATION OF THE MASTER LEASE, AND THE ALLOWANCE OF THE  
OMEGA REJECTION DAMAGES CLAIM IN CONNECTION THEREWITH;  
(IV) APPROVING FORM OF MANAGEMENT AND OPERATIONS TRANSFER  
AGREEMENT; AND (V) GRANTING RELATED RELIEF**

TO: (a) the United States Trustee for the District of Delaware; (b) proposed counsel to the Committee; (c) counsel for the Omega Entities; (d) counsel for New Ark Capital, LLC; (e) counsel for Barrow Street Capital LLC and its affiliates; (f) counsel for Eagle Arc Partners LLC (f/k/a BM Eagle Holdings); (g) the United States Attorney for the District of Delaware; (h) the Internal Revenue Service; (i) the Securities and Exchange Commission; (j) the Centers for Medicare and Medicaid Services; and (k) all parties entitled to notice pursuant to Local Rule 2002-1(b).

**PLEASE TAKE NOTICE** that, on November 3, 2021, the above-captioned debtors and debtors-in-possession (collectively, the “**Debtors**”) filed the *Motion of Debtors for Entry of an Order (I) Authorizing Transfer of the Management, Operations, and Related Assets of the Omega Facilities Free and Clear of All Liens, Claims, Encumbrances, and Interests; (II) Approving Procedures for the Debtors’ Future Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; (III) Approving Rejection and Termination of the Master Lease, and the Allowance of the Omega Rejection Damages Claim in Connection Therewith; (IV) Approving Form of Management and Operations Transfer Agreement; and*

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<sup>1</sup> The last four digits of Gulf Coast Health Care, LLC’s federal tax identification number are 9281. There are 62 Debtors in these chapter 11 cases, which cases are being jointly administered for procedural purposes only. A complete list of the Debtors and the last four digits of their federal tax identification numbers are not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://dm.epiq11.com/GulfCoastHealthCare>. The location of Gulf Coast Health Care, LLC’s corporate headquarters and the Debtors’ service address is 40 South Palafox Place, Suite 400, Pensacola, FL 32502.

(V) *Granting Related Relief* (the “**Motion**”) [Docket No. 166] with the United States Bankruptcy Court for the District of Delaware (the “**Court**”).

**PLEASE TAKE FURTHER NOTICE** that, contemporaneously with the Motion, the Debtors also filed the *Motion of Debtors for Entry of an Order (I) Shortening Notice Period for MOTA Approval Motion and (II) Granting Related Relief* (the “**Motion to Shorten**”) [Docket No. 168]. You were previously served with a copy of the Motion and the Motion to Shorten.

**PLEASE TAKE FURTHER NOTICE** that, on November 3, 2021, the Court entered the *Order (I) Shortening Notice Period for MOTA Approval Motion and (II) Granting Related Relief* [Docket No. 170].

**PLEASE TAKE FURTHER NOTICE** that an objection, if any, to the Motion must be in writing, filed with the Court, 824 Market Street, 3rd Floor, Wilmington, Delaware 19801, and served upon (a) Gulf Coast Health Care, LLC, c/o Ankura Consulting Group, LLC, 485 Lexington Avenue, 10th Floor, New York, NY 10017 (Attn: M. Benjamin Jones); (b) proposed counsel to the Debtors, McDermott Will & Emery LLP, 444 West Lake Street, Suite 4000, Chicago, IL 60606 (Attn: Daniel M. Simon and Emily C. Keil), and 1007 North Orange Street, 10th Floor, Wilmington, DE 19801 (Attn: David R. Hurst); (c) counsel to the United States Trustee for the District of Delaware, 844 King Street, Suite 2207, Lockbox 35, Wilmington, DE 19801 (Attn: Joseph J. McMahon, Jr.); (d) proposed counsel to the Committee, Greenberg Traurig LLP, 77 West Wacker Drive, Suite 3100, Chicago, IL 60601 (Attn: Nancy A. Peterman) and Terminus 200, 3333 Piedmont Road NE, Suite 2500, Atlanta, GA 30305 (Attn: David B. Kurzweil); (e) counsel for the Omega Entities, Weil Gotshal & Manges LLP, 767 Fifth Avenue, New York, NY 10153 (Attn: Gary Holtzer, Robert Lemons, and Jason Hufendick), and Ferguson Braswell Fraser Kubasta PC, 2500 Dallas Parkway, Suite 600, Plano, TX 75093 (Attn: Leighton Aiken) and Morris Nichols Arsht & Tunnell, 1201 North Market Street, 16th Floor, P.O. Box 1347, Wilmington, DE 19899 (Attn: Eric D. Schwartz); (f) counsel for New Ark Capital, LLC, DLA Piper LLP (US), 1900 N. Pearl Street, Suite 2200, Dallas, TX 75201 (Attn: James Muenker); (g) counsel for Barrow Street Capital, LLC and its affiliates, Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kelley Cornish and Alice Eaton); and (h) counsel for Eagle Arc Partners LLC (f/k/a BM Eagle Holdings), Arent Fox LLP, 1301 Avenue of the Americas, 42nd Floor, New York, NY 10019 (Attn: George Angelich and Michael Blass), and Fenigstein & Kaufman, APC, 1900 Avenue of the Stars, Suite 2300, Los Angeles, CA 90067 (Attn: S. Jack Fenigstein), so that it is received on or before **November 17, 2021 at 4:00 p.m. (ET)**.

**PLEASE TAKE FURTHER NOTICE** that a hearing on the Motion, if necessary, will be held on **November 23, 2021 at 10:00 a.m. (ET)** before the Honorable Karen B. Owens, United States Bankruptcy Judge, United States Bankruptcy Court for the District of Delaware, 824 Market Street, 6th Floor, Courtroom No. 3, Wilmington, Delaware 19801.

**IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED BY THE MOTION WITHOUT FURTHER NOTICE OR A HEARING.**

Dated: Wilmington, Delaware  
November 3, 2021

**MCDERMOTT WILL & EMERY LLP**

/s/ David R. Hurst

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*Proposed Counsel for Debtors and  
Debtors-in-Possession*