

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

In re:

GULF COAST HEALTH CARE, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 21-11336 (KBO)

(Jointly Administered)

**NOTICE OF DEPOSITION OF OHI ASSET FUNDING (DE), LLC PURSUANT TO
FED R. CIV. P. 30(b)(6) AND FED R. BANKR. P. 7030 AND
OF INTENT TO SERVE A DOCUMENT SUBPOENA**

PLEASE TAKE NOTICE THAT, pursuant to Federal Rules of Civil Procedure 26 and 30, made applicable by Rules 7026, 7030, and 9014 of the Federal Rules of Bankruptcy Procedure, and Rule 7030-1 of the Local Rules of the United States Bankruptcy Court of the District of Delaware, REIT Solutions II, LLC (f/k/a REIT Solutions, Inc.), SJB No. 2, LLC, JJT No. 1, LLC, Wet One, LLC and DLF No. 3, LLC (collectively, the “*Noteholder Claimants*”), shall take the deposition of OHI Asset Funding (DE), LLC and the related Omega Entities² that entered into that certain *Restructuring Support Agreement* with the above-captioned Debtors (collectively, “*Omega*”) by one or more corporate witnesses designated by Omega to testify on its behalf in

¹ 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, 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 are not provided herein. A complete list of such information may be obtained on the website of the Debtors’ proposed 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.

² The Omega Entities include, without limitation: Omega Healthcare Investors, Inc., CSE Pine View LLC; Dixie White Nursing Home, LLC; Ocean Springs Nursing Home, LLC; Pensacola Real-Estate Holdings I, LLC; Pensacola Real-Estate Holdings II, LLC; Pensacola Real-Estate Holdings III, LLC; Pensacola Real-Estate Holdings IV, LLC; Pensacola Real-Estate Holdings V, LLC; Skyler Boyington, LLC; Skyler Florida, LLC; Skyler Pensacola, LLC; Carnegie Gardens LLC; Greenbough, LLC; Marianna Holdings, LLC; Panama City Nursing Center LLC; Skyler Maitland LLC; Suwanee, LLC; OHI Asset (FL) Lake Placid, LLC; OHI Asset (FL) Pensacola – Hillview, LLC; OHI Asset (FL) Eustis, LLC; OHI Asset (FL) Pensacola, LLC; OHI Asset (FL) Melbourne, LLC; OHI Asset (FL) Pensacola – Nine Mile, LLC; and OHI Asset (FL) Lake City, LLC.

relation to *Objection of the Noteholder Claimants to the Motion of Debtors for Entry of Order Approving Assumption of Restructuring Support Agreement* [Dkt. No. 186] and the *Objection of the Noteholder Claimants to the Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Financing and (B) Utilize Cash Collateral, (II) Granting Adequate Protection to Prepetition Secured Parties, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief* [Dkt. No. 187] and with respect to the Examination Topics set forth in **Exhibit 1** attached hereto.

PLEASE TAKE FURHTER NOTICE THAT the deposition shall take place on November 18, 2021 commencing at 10:00 a.m. (ET). The deposition will take place before a Notary Public or other person authorized by law to administer oaths and will continue day to day until completed. The deposition will take place via videoconference. The deposition will be recorded by stenographic means, and will also be recorded by audiovisual means. The deposition will be taken for all purposes permitted by the Federal Rules of Civil Procedure, Federal Rules of Bankruptcy Procedure, and Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware. The deposition is being taken for discovery, for use at any evidentiary hearing or trial, or for any purposes that are permitted by law or under the rules of this Court.

PLEASE TAKE FURTHER NOTICE THAT pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Omega is required to designate one or more knowledgeable persons to testify on its behalf with respect to the matters set forth in **Exhibit 1** attached hereto. The Noteholder Claimants reserve their rights to take additional depositions of Omega and any affiliated entities, and to seek additional discovery from Omega and any other parties regarding the above-captioned cases.

PLEASE TAKE FURTHER NOTICE THAT pursuant to Federal Rule of Bankruptcy Procedure 9016, and Federal Rules of Civil Procedure 30(b)(2) and 45(a)(4), the Noteholder Claimants hereby give notice that they will serve a subpoena to produce documents, information, or objects in the above-captioned chapter 11 cases on Omega. A copy of the subpoena is attached as **Exhibit 2**. Documents responsive to the subpoena's requests will be delivered to counsel in electronic form or otherwise take place at and on the dates, times, and locations specified in the subpoena, unless otherwise agreed by the issuing party.

[signature page follows]

Dated: November 7, 2021
Wilmington, Delaware

/s/ Robert C. Maddox

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