

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

In re:)	Chapter 11
)	
GULF COAST HEALTH CARE, LLC, <i>et al.</i> , ¹)	Case No. 21-11336 (KBO)
)	
Debtors.)	Jointly Administered
)	
)	Related to Docket Nos. 6, 52, 61
)	

**CERTIFICATION OF COUNSEL REGARDING MOTION OF DEBTORS FOR ENTRY
OF INTERIM AND FINAL ORDERS AUTHORIZING THE IMPLEMENTATION OF
PROCEDURES TO MAINTAIN AND PROTECT CONFIDENTIAL HEALTH
INFORMATION AS REQUIRED BY APPLICABLE PRIVACY RULES**

The undersigned, proposed counsel to the above-captioned debtors and debtors-in-possession (the “**Debtors**”), hereby certifies as follows:

1. On October 14, 2021, the Debtors filed the *Motion of Debtors for Entry of Interim and Final Orders Authorizing the Implementation of Procedures to Maintain and Protect Confidential Health Information as Required by Applicable Privacy Rules* [Docket No. 6] (the “**Motion**”) with the United States Bankruptcy Court for the District of Delaware (the “**Court**”).

2. On October 15, 2021, the Court entered the *Interim Order Authorizing the Implementation of Procedures to Maintain and Protect Confidential Health Information as Required by Applicable Privacy Rules* [Docket No. 52].

3. On October 15, 2021, the *Notice of Entry of Interim Order and Final Hearing With Respect to Motion of Debtors for Entry of Interim and Final Orders Authorizing the*

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 9511 Holsberry Lane, Suite B11, Pensacola, FL 32534.

Implementation of Procedures to Maintain and Protect Confidential Health Information as Required by Applicable Privacy Rules [Docket No. 61] (the “**Notice of Hearing**”) was filed with the Court.

4. Pursuant to the Notice of Hearing, objections to the Motion and the entry of a final order approving the Motion were required to have been filed with the Court and served so as to be received no later than 4:00 p.m. (ET) on November 5, 2021 (as extended, the “**Objection Deadline**”). The Objection Deadline was extended until November 8, 2021 at 4:00 p.m. (ET) for the Official Committee of Unsecured Creditors (the “**Committee**”) and Medline Industries, Inc.

5. The Objection Deadline has passed and no objections to the Motion appear on the docket or were served upon undersigned counsel. However, the Committee informally raised concerns regarding the Motion (the “**Informal Objections**”).

6. The Debtors and the Committee have negotiated in good faith to resolve the Informal Objections, and the Debtors have amended the proposed form of final order approving the Motion (the “**Revised Order**”) to reflect the agreement of the parties as well as certain other non-material changes. A copy of the Revised Order is attached hereto as **Exhibit A**, and a blackline version of the Revised Order reflecting all changes from the form of final order submitted with the Motion is attached hereto as **Exhibit B**.

[Remainder of Page Intentionally Left Blank]

Accordingly, the Debtors respectfully request that the Court enter the Revised Order attached hereto as **Exhibit A** at the convenience of the Court.

Dated: Wilmington, Delaware
November 9, 2021

MCDERMOTT WILL & EMERY LLP

/s/ David R. Hurst

David R. Hurst (I.D. No. 3743)
1007 North Orange Street, 10th Floor
Wilmington, Delaware 19801
Telephone: (302) 485-3900
Facsimile: (302) 351-8711
Email: dhurst@mwe.com

- and -

Daniel M. Simon (admitted *pro hac vice*)
Emily C. Keil (admitted *pro hac vice*)
444 West Lake Street, Suite 4000
Chicago, IL 60606
Telephone: (312) 372-2000
Facsimile: (312) 984-7700
Email: dmsimon@mwe.com
ekeil@mwe.com

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