

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

In re:) Chapter 11
))
) Case No. 21-11336 (KBO)
GULF COAST HEALTH CARE, LLC, *et al.*,¹)
) Jointly Administered
Debtors.)
) **Related to Docket Nos. 12, 57, 65, 150, 211**
)

**CERTIFICATION OF COUNSEL REGARDING MOTION OF DEBTORS
FOR ENTRY OF INTERIM AND FINAL ORDERS (I) APPROVING DEBTORS'
PROPOSED FORM OF ADEQUATE ASSURANCE OF PAYMENT; (II)
ESTABLISHING PROCEDURES FOR RESOLVING OBJECTIONS BY UTILITY
COMPANIES; AND (III) PROHIBITING UTILITY COMPANIES FROM
ALTERING, REFUSING, OR DISCONTINUING SERVICE**

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 (I) Approving Debtors’ Proposed Form of Adequate Assurance of Payment; (II) Establishing Procedures for Resolving Objections by Utility Companies; and (III) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service* [Docket No. 12] (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 (I) Approving Debtors' Proposed Form of Adequate Assurance of Payment; (II) Establishing Procedures for Resolving*

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.

Objections by Utility Companies; and (III) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service [Docket No. 57].

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 (I) Approving Debtors' Proposed Form of Adequate Assurance of Payment; (II) Establishing Procedures for Resolving Objections by Utility Companies; and (III) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service* [Docket No. 65] (the “**Notice of Hearing**”) was filed with the Court.

4. Pursuant to the Notice of Hearing, objections to the Motion were to be filed and served no later than November 5, 2021 at 4:00 p.m. (ET) (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 and Medline Industries.

5. On October 29, 2021, certain utility providers, including Florida Power & Light Company, Gulf Power Company, and TECO Peoples Gas System (collectively, the “**Utilities**”), filed the *Objection of Certain Utility Companies to the Motion of Debtors for Entry of Interim and Final Orders (I) Approving Debtors' Proposed Form of Adequate Assurance of Payment; (II) Establishing Procedures for Resolving Objections by Utility Companies; and (III) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service* [Docket No. 150] (the “**Utility Provider Objection**”). No other objections to the relief sought in the Motion were received.

6. The Debtors negotiated in good faith with the Utilities to resolve their concerns and, on November 10, 2021, the Utility Provider Objection was withdrawn by the Utilities, pursuant to a settlement between the Utilities and the Debtors. *See Notice of Withdrawal of*

Objection of Certain Utility Companies to the Motion of Debtors for Entry of Interim and Final Orders (I) Approving Debtors' Proposed Form of Adequate Assurance of Payment; (II) Establishing Procedures for Resolving Objections by Utility Companies; and (III) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service [Docket No. 211]. Thus, the relief sought in the Motion on a final basis is now unopposed.

7. The Debtors have amended the proposed form of final order approving the Motion (the “**Revised Order**”) to implement certain 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 10, 2021

MCDERMOTT WILL & EMERY LLP

/s/ David R. Hurst

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