

**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
	)	
	)	Related to Docket Nos. 8, 67, 207
	)	

**CERTIFICATION OF COUNSEL REGARDING REVISED  
FINAL ORDER (I) AUTHORIZING THE DEBTORS TO (A) CONTINUE  
TO OPERATE THEIR EXISTING CASH MANAGEMENT SYSTEM, (B) MAINTAIN  
EXISTING BANK ACCOUNTS AND BUSINESS FORMS AND HONOR CERTAIN  
PREPETITION OBLIGATIONS RELATED TO THE USE THEREOF, (C) MAINTAIN  
PURCHASING CARD PROGRAM AND HONOR PREPETITION OBLIGATIONS  
RELATED THERETO, AND (D) CONTINUE TO PERFORM INTERCOMPANY  
TRANSACTIONS; (II) EXTENDING THE TIME FOR THE DEBTORS TO  
COMPLY WITH 11 U.S.C. § 345(b) DEPOSIT AND INVESTMENT  
REQUIREMENTS; AND (III) GRANTING RELATED RELIEF**

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) Authorizing the Debtors to (A) Continue to Operate Their Existing Cash Management System, (B) Maintain Existing Bank Accounts and Business Forms and Honor Certain Prepetition Obligations Related to the Use Thereof, (C) Maintain Purchasing Card Program and Honor Prepetition Obligations Related Thereto, and (D) Continue to Perform Intercompany Transactions; (II) Extending the Time for the Debtors to Comply with 11 U.S.C.*

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

§ 345(b) Deposit and Investment Requirements; and (III) Granting Related Relief [Docket No. 8] (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) Authorizing the Debtors to (A) Continue to Operate Their Existing Cash Management System, (B) Maintain Existing Bank Accounts and Business Forms and Honor Certain Prepetition Obligations Related to the Use Thereof, (C) Maintain Purchasing Card Program and Honor Prepetition Obligations Related Thereto, and (D) Continue to Perform Intercompany Transactions; (II) Extending the Time for the Debtors to Comply with 11 U.S.C. § 345(b) Deposit and Investment Requirements; and (III) Granting Related Relief* [Docket No. 67].

3. On November 9, 2021, the Debtors filed the *Certification of Counsel Regarding Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue to Operate Their Existing Cash Management System, (B) Maintain Existing Bank Accounts and Business Forms and Honor Certain Prepetition Obligations Related to the Use Thereof, (C) Maintain Purchasing Card Program and Honor Prepetition Obligations Related Thereto, and (D) Continue to Perform Intercompany Transactions; (II) Extending the Time for the Debtors to Comply with 11 U.S.C. § 345(b) Deposit and Investment Requirements; and (III) Granting Related Relief* [Docket No. 207] (the “**Certification of Counsel**”), which included a revised proposed final order (the “**Proposed Final Order**”) reflecting certain modifications and non-material changes from the version initially filed with the Motion.

4. On November 12, 2021, the Court conducted a hearing (the “**Second Day Hearing**”) on, among other things, approval of the Motion on a final basis and entry of the

Proposed Final Order. At the Second Day Hearing, the Court requested that the Debtors revise the Proposed Final Order to reflect certain modifications.

5. The revised form of order attached hereto as **Exhibit A** (the “**Revised Proposed Final Order**”) reflects the Court’s requested modifications to the Proposed Final Order. A blackline version of the Revised Proposed Final Order reflecting the Court’s requested revisions is attached hereto as **Exhibit B**.

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

Dated: Wilmington, Delaware  
November 12, 2021

**MCDERMOTT WILL & EMERY LLP**

/s/ David R. Hurst

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