

**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 No. 165**
)

**CERTIFICATION OF COUNSEL REGARDING APPLICATION
OF DEBTORS FOR ENTRY OF ORDER AUTHORIZING THE RETENTION
AND EMPLOYMENT OF EPIQ CORPORATE RESTRUCTURING, LLC AS
ADMINISTRATIVE ADVISOR EFFECTIVE AS OF THE PETITION DATE**

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

1. On November 2, 2021, the Debtors filed the *Application of Debtors for Entry of Order Authorizing the Retention and Employment of Epiq Corporate Restructuring, LLC as Administrative Advisor Effective as of the Petition Date* [Docket No. 165] (the “**Application**”) with the United States Bankruptcy Court for the District of Delaware (the “**Court**”). The Application included a *Notice of Hearing on Application of Debtors for Entry of Order Authorizing the Retention and Employment of Epiq Corporate Restructuring, LLC as Administrative Advisor Effective as of the Petition Date* (the “**Notice of Hearing**”).

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.

2. Pursuant to the Notice of Hearing, objections to the Application 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 16, 2021 (the “**Objection Deadline**”).

3. The Objection Deadline has passed and no objections to the Application appear on the docket or were served upon undersigned counsel. However, the Office of the United States Trustee for the District of Delaware (the “**U.S. Trustee**”) informally raised concerns regarding the Application (the “**Informal Objections**”).

4. The Debtors and the U.S. Trustee have negotiated in good faith to resolve the Informal Objections, and the Debtors have amended the proposed form of order approving the Application to reflect the agreement of the parties (the “**Revised Order**”). Counsel to the U.S. Trustee has reviewed and does not object to the entry of the Revised Order, which is attached hereto as **Exhibit A**. A blackline version of the Revised Order reflecting all changes from the form of final order submitted with the Application 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 18, 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*