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.	)	
	)	
	)	

NOTICE OF *AMENDED*[2] AGENDA OF MATTERS SCHEDULED FOR HEARING ON NOVEMBER 23, 2021 AT 9:00 A.M. (EASTERN TIME) BEFORE THE HONORABLE KAREN B. OWENS

THE REMOTE HEARING WILL BE CONDUCTED ENTIRELY BY ZOOM AND REQUIRES ALL PARTICIPANTS TO REGISTER AT LEAST 2 HOURS IN ADVANCE.

COURT CALL WILL NOT BE USED TO DIAL IN.

PLEASE USE THE FOLLOWING LINK TO REGISTER IN ADVANCE FOR THE HEARING:

https://debuscourts.zoomgov.com/meeting/register/vJItce6qrTIoGuna76-Pz63bK3dXyl1nfTY

ONCE REGISTERED, PARTIES WILL RECEIVE A CONFIRMATION EMAIL CONTAINING PERSONAL LOG-IN INFORMATION FOR THE HEARING.

CONTINUED MATTERS

1. Motion of Debtors for Entry of Order Approving Assumption of Restructuring Support Agreement (Filed 10/22/21) [Docket No. 107]

[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, 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] **Amended agenda items are noted in bold.**

Related Documents:

(a) Notice of Change of Hearing Time for November 23, 2021 Omnibus Hearing (Filed 11/15/21) [Docket No. 255]

(b) Notice of Adjournment of Hearing with Respect to (I) Motion for Approval of Restructuring Support Agreement and (II) Motion for Extension of Automatic Stay (Filed 11/18/21) [Docket No. 289]

Responses Received:

(a) Objection of the Noteholder Claimants to the Motion of Debtors for Entry of Order Approving Assumption of Restructuring Support Agreement (Filed 11/5/21) [Docket No. 186]

(b) Omnibus Objection of the Official Committee of Unsecured Creditors to the Debtors' DIP Financing and RSA Motions (Filed 11/11/21) [Docket No. 226]

(c) Medline Industries, Inc.'s Objection to the Debtors' RSA Motion and Joinder to the Committee's Omnibus Objection (Filed 11/16/21) [Docket No. 262]

(d) Limited Objection of Housing & Healthcare Finance, LLC to (1) Debtors' Motion Regarding Postpetition Financing and Use of Cash Collateral and (2) Debtors' Motion for Entry of Order Approving Assumption of Restructuring Support Agreement (Filed 11/16/21) [Docket No. 263]

(e) Objection of the United States Trustee to the Motion of Debtors for Entry of Order Approving Assumption of Restructuring Support Agreement (Filed 11/16/21) [Docket No. 265]

(f) BME Landlord's Omnibus Objection to (1) Final Relief Pursuant 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 and (2) Motion of Debtors for Entry of Order Approving Assumption of Restructuring Support Agreement (Filed 11/16/21) [Docket No. 266]

Objection Deadline: November 5, 2021 at 4:00 p.m. (ET); extended to November 16, 2021 at 4:00 p.m. (ET) for (i) the Official Committee of Unsecured Creditors (the "**Committee**"), (ii) Medline Industries, Inc. ("**Medline**"), (iii) BME Gulf Coast LLC, 1108 Church Street MS LLC, 101 Cobblestone Terrace GA LLC, 3401 Main Street MS LLC, and 191 Highway 511 East MS LLC (collectively, the "**BME Landlords**"), (iv) Housing and Healthcare Finance, LLC ("**HHCF**"), (v) the United States of America, and (vi) the Office of the United States Trustee for the District of Delaware (the "**U.S. Trustee**")

Status: This matter will not be going forward. With the consent of the parties, this matter has been adjourned until the December 2, 2021 (10:00 a.m.) hearing in these cases.

2. Motion of Debtors for Entry of Order Extending Automatic Stay to Certain Non-Debtor Co-Defendants (Filed 11/2/21) [Docket No. 155]

Related Documents:

(a) Notice of Change of Hearing Time for November 23, 2021 Omnibus Hearing (Filed 11/15/21) [Docket No. 255]

(b) Notice of Adjournment of Hearing with Respect to (I) Motion for Approval of Restructuring Support Agreement and (II) Motion for Extension of Automatic Stay (Filed 11/18/21) [Docket No. 289]

Responses Received:

(a) Objection of Florida Plaintiffs to Motion of Debtors for Entry of Order Extending Automatic Stay to Certain Non-Debtor Co-Defendants (Filed 11/16/21) [Docket No. 270]

Objection Deadline: November 16, 2021 at 4:00 p.m. (ET);
Debtors' deadline to respond to the filed objection is extended to November 24, 2021

Status: This matter will not be going forward. With the consent of the parties, this matter has been adjourned until the December 2, 2021 (10:00 a.m.) hearing in these cases.

3. Application of Debtors for Entry of Order Authorizing Debtors to (I) Retain Ankura Consulting Group, LLC to Provide Debtors a Chief Restructuring Officer and Certain Additional Personnel and (II) Designate M. Benjamin Jones as Chief Restructuring Officer and Russel A. Perry as Assistant Chief Restructuring Officer for the Debtors, Effective as of the Petition Date (Filed 11/2/21) [Docket No. 163]

Related Documents:

(a) Notice of Change of Hearing Time for November 23, 2021 Omnibus Hearing (Filed 11/15/21) [Docket No. 255]

Response Received:

(a) Informal response from the U.S. Trustee

Objection Deadline: November 16, 2021 at 4:00 p.m. (ET); extended to November 26, 2021 at 4:00 p.m. (ET) for the U.S. Trustee

Status: This matter will not be going forward. With the consent of the parties, this matter has been adjourned until the December 2, 2021 (10:00 a.m.) hearing in these cases.

MATTERS WITH ORDERS ENTERED

4. Motion of Debtors for Entry of Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals (Filed 11/2/21) [Docket No. 153]

Related Documents:

(a) Notice of Change of Hearing Time for November 23, 2021 Omnibus Hearing (Filed 11/15/21) [Docket No. 255]

(b) Certification of Counsel Regarding Motion of Debtors for Entry of Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals (Filed 11/18/21) [Docket No. 286]

(c) Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals (Filed 11/18/21) [Docket No. 296]

Responses Received:

(a) Informal response from the U.S. Trustee

(b) Informal response from the Committee

(c) Informal response received from the Patient Care Ombudsman

Objection Deadline: November 16, 2021 at 4:00 p.m. (ET)

Status: This matter will not be going forward. The Court has entered an order granting the Motion.

5. Motion of Debtors for Entry of Order Authorizing the Employment and Payment of Professionals Used in the Ordinary Course of Business (Filed 11/2/21) [Docket No. 154]

Related Documents:

(a) Notice of Change of Hearing Time for November 23, 2021 Omnibus Hearing (Filed 11/15/21) [Docket No. 255]

(b) Certification of Counsel Regarding Motion of Debtors for Entry of Order Authorizing the Employment and Payment of Professionals Used in the Ordinary Course of Business (Filed 11/18/21) [Docket No. 287]

(c) Order Authorizing the Employment and Payment of Professionals Used in the Ordinary Course of Business (Filed 11/18/21) [Docket No. 299]

Responses Received: None.

Objection Deadline: November 16, 2021 at 4:00 p.m. (ET)

Status: This matter will not be going forward. The Court has entered an order granting the Motion.

6. Application of Debtors for Entry of Order Authorizing the Retention and Employment of McDermott Will & Emery LLP as Counsel for the Debtors and Debtors-in-Possession Effective as of the Petition Date (Filed 11/2/21) [Docket No. 162]

Related Documents: None.

(a) Notice of Change of Hearing Time for November 23, 2021 Omnibus Hearing (Filed 11/15/21) [Docket No. 255]

(b) Supplemental Declaration of Daniel M. Simon in Support of Application of Debtors for Entry of Order Authorizing the Retention and Employment of McDermott Will & Emery LLP as Counsel for the Debtors and Debtors-in-Possession Effective as of the Petition Date (Filed 11/18/21) [Docket No. 295]

(c) Certification of Counsel Regarding Application of Debtors for Entry of Order Authorizing the Retention and Employment of McDermott Will & Emery LLP as Counsel for the Debtors and Debtors-in-Possession Effective as of the Petition Date (Filed 11/18/21) [Docket No. 297]

(d) Order Authorizing the Retention and Employment of McDermott Will & Emery LLP as Counsel for the Debtors and Debtors-in-Possession Effective as of the Petition Date (Filed 11/19/21) [Docket No. 306]

Response Received:

(a) Informal response from the U.S. Trustee

Objection Deadline: November 16, 2021 at 4:00 p.m. (ET); extended to November 19, 2021 at 10:00 a.m. (ET) for the U.S. Trustee

Status: This matter will not be going forward. The Court has entered an order granting the Motion.

7. Application of Debtors for Entry of Order Authorizing the Retention and Employment of Epiq Corporate Restructuring, LLC as Administrative Advisor Effective as of Petition Date (Filed 11/2/21) [Docket No. 165]

Related Documents:

(a) Notice of Change of Hearing Time for November 23, 2021 Omnibus Hearing (Filed 11/15/21) [Docket No. 255]

(b) 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 Petition Date (Filed 11/18/21) [Docket No. 288]

(c) Order Authorizing Debtors to Retain and Employ Epiq Corporate Restructuring, LLC as Administrative Advisor Effective as of the Petition Date (Filed 11/18/21) [Docket No. 300]

Responses Received:

(a) Informal response from the U.S. Trustee

Objection Deadline: November 16, 2021 at 4:00 p.m. (ET)

Status: This matter will not be going forward. The Court has entered an order granting the Motion.

CONTESTED MATTERS GOING FORWARD:

8. 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 (Filed 10/14/21) [Docket No. 14] (the "DIP Financing Motion")

Related Documents:

(a) Declaration of M. Benjamin Jones in Support of 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 (Filed 10/14/21) [Docket No. 15] (the "DIP Financing Declaration")

(b) Declaration of M. Benjamin Jones in Support of Chapter 11 Petitions and First Day Pleadings (Filed 10/14/21) [Docket No. 16] **(**the "First Day Declaration")

(c) Interim Order (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 (Filed 10/18/21) [Docket No. 72]

(d) Notice of Entry of Interim Order and Final Hearing with Respect to Motion of the 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 (Filed 10/18/21) [Docket No. 73]

(e) Notice of Final Hearing on First Day Motions (Filed 10/19/21) [Docket No. 81]

(f) Notice of Change of Hearing Time for November 23, 2021 Omnibus Hearing (Filed 11/15/21) [Docket No. 255]

(g) Notice of Filing of Proposed Final DIP Financing Order (Filed 11/21/21) [Docket No. 317]

(h) Declaration of Daniel J. Booth in Support of Omega Entities' Statement in Support of (I) the DIP Motion [Docket No. 14] and (II) the MOTA Approval Motion [Docket No. 166] and Omnibus Response to Objections [To be Filed on 11/22/21]

Responses Received:

(a) 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 (Filed 11/5/21) [Docket No. 187]

(b) Omnibus Objection of the Official Committee of Unsecured Creditors to the Debtors' DIP Financing and RSA Motions (Filed 11/11/21) [Docket No. 226]

(c) Medline Industries, Inc.'s Objection to the Debtors' RSA Motion and Joinder to the Committee's Omnibus Objection (Filed 11/16/21) [Docket No. 262]

(d) Limited Objection of Housing & Healthcare Finance, LLC to (1) Debtors' Motion Regarding Postpetition Financing and Use of Cash Collateral and (2) Debtors' Motion for Entry of Order Approving Assumption of Restructuring Support Agreement (Filed 11/16/21) [Docket No. 263]

(e) Limited Objection by the United States to the Debtors' Motion for Entry of Final Order Authorizing Debtor to Incur Debtor-in-Possession Financing and Granted Related Relief (Filed 11/16/21) [Docket No. 264]

(f) BME Landlord's Omnibus Objection to (1) Final Relief Pursuant 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 and (2) Motion of Debtors for Entry of Order Approving Assumption of Restructuring Support Agreement (Filed 11/16/21) [Docket No. 266]

(g) Limited Objection of Daniel T. McMurray, Patient Care Ombudsman, to the Debtors' Motion to Utilize Cash Collateral and for DIP Financing (Filed 11/16/21) [Docket No. 269]

(h) Debtor's Omnibus Reply to Objections of Various Parties to (I) the DIP Motion and (II) the MOTA Approval Motion (Filed 11/21/21) [Docket No. 316]

(i) Omega Entities' Statement in Support of (I) the DIP Motion [Docket No. 14] and (II) the MOTA Approval Motion [Docket No. 166] and Omnibus Response to Objections (Filed 11/21/21) [Docket No. 319]

(j) Newark Capital, LLC's Statement in Support of the Debtors' DIP Motion and MOTA Approval Motion, and Joinder to the Debtors' Omnibus Reply to Objections Filed Thereto (Filed 11/21/21) [Docket No. 320]

Objection Deadline: November 5, 2021 at 4:00 p.m. (ET); extended to November 16, 2021 at 4:00 p.m. (ET) for the Committee, Medline, the BME Landlords, HHCF, the United States of America, the U.S. Trustee, and the Patient Care Ombudsman

Witness Information:

(a) The Debtors intend to offer the direct testimony of M. Benjamin Jones, the Debtors' Chief Restructuring Officer**, who will be testifying from his home in Pinehurst, North Carolina**. Mr. Jones will be alone during his testimony, and will have access to the following documents: (i) the First Day Declaration; (ii) the DIP Financing Declaration; (iii) the DIP Financing Motion; (iv) the MOTA Motion (as defined below); and (v) all documents identified by the Debtors on their exhibit list. The Debtors anticipate that Mr. Jones may be cross examined by the various parties that filed objections to the DIP Financing Motion and the MOTA Motion.

Status: This matter will be going forward.

9. Motion of Debtors for Entry of an Order (I) Authorizing Transfer of the Management, Operations, and Related Assets of the Omega Facilities Free and Clear of All Liens, Claims, Encumbrances, and Interests; (II) Approving Procedures for the Debtors' Future Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; (III) Approving Rejection and Termination of the Master Lease, and the Allowance of the Omega Rejection Damages Claim in Connection Therewith; (IV) Approving Form of Management and Operations Transfer Agreement; and (V) Granting Related Relief (Filed 11/2/21) [Docket No. 166] (the "MOTA Motion")

Related Documents:

(a) Motion of Debtors for Entry of Order (I) Shortening Notice Period for MOTA Approval Motion and (II) Granting Related Relief (Filed 11/3/21) [Docket No. 168]

(b) Order (I) Shortening Notice Period for MOTA Approval Motion and (II) Granting Related Relief (Filed 11/3/21) [Docket No. 170]

(c) Notice of Hearing on Motion of Debtors for Entry of an Order (I) Authorizing Transfer of the Management, Operations, and Related Assets of the Omega Facilities Free and Clear of All Liens, Claims, Encumbrances, and Interests; (II) Approving Procedures for the Debtors' Future Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; (III) Approving Rejection and Termination of the Master Lease, and the Allowance of the Omega Rejection Damages Claim in Connection Therewith; (IV) Approving Form of Management and Operations Transfer Agreement; and (V) Granting Related Relief (Filed 11/3/21) [Docket No. 172]

(d) Notice of Change of Hearing Time for November 23, 2021 Omnibus Hearing (Filed 11/15/21) [Docket No. 255]

(e) Notice of Filing of (I) Revised Proposed Order Authorizing Transfer of the Management, Operations, and Related Assets of the Omega Facilities and Granting Related Relief and (II) Revised Management and Operations Transfer Agreement (Filed 11/21/21) [Docket No. 318]

(f) Declaration of Daniel J. Booth in Support of Omega Entities' Statement in Support of (I) the DIP Motion [Docket No. 14] and (II) the MOTA Approval Motion [Docket No. 166] and Omnibus Response to Objections [To be Filed on 11/22/21]

Responses Received:

(a) Objection of the Official Committee of Unsecured Creditors to the Debtors' MOTA Motion (Filed 11/17/21) [Docket No. 273]

(b) United States' Objection and Reservation of Rights to the Debtors' Motion for Order Authorizing Transfer of Management, Operations, and Related Assets Free and Clear of Liens, Claims, Encumbrances and Interests and Seeking Related Relief (Filed 11/17/21) [Docket No. 274]

(c) Objection of the United States Trustee to the Motion of Debtors for Entry of an Order (I) Authorizing Transfer of the Management, Operations, and Related Assets of the Omega Facilities Free and Clear of All Liens, Claims, Encumbrances, and Interests; (II) Approving Procedures for the Debtors' Future Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; (III) Approving Rejection and Termination of the Master Lease, and the

Allowance of the Omega Rejection Damages Claim in Connection Therewith; (IV) Approving Form of Management and Operations Transfer Agreement; and (V) Granting Related Relief (Filed 11/17/21) [Docket No. 276]

(d) Objection of the Noteholder Claimants to Motion of Debtors Motion of Debtors for Entry of an Order (I) Authorizing Transfer of the Management, Operations, and Related Assets of the Omega Facilities Free and Clear of All Liens, Claims, Encumbrances, and Interests; (II) Approving Procedures for the Debtors' Future Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; (III) Approving Rejection and Termination of the Master Lease, and the Allowance of the Omega Rejection Damages Claim in Connection Therewith; (IV) Approving Form of Management and Operations Transfer Agreement; and (V) Granting Related Relief (Filed 11/17/21) [Docket No. 281]

(e) Debtor's Omnibus Reply to Objections of Various Parties to (I) the DIP Motion and (II) the MOTA Approval Motion (Filed `11/21/21) [Docket No. 316]

(f) Omega Entities' Statement in Support of (I) the DIP Motion [Docket No. 14] and (II) the MOTA Approval Motion [Docket No. 166] and Omnibus Response to Objections (Filed 11/21/21) [Docket No. 319]

(g) Newark Capital, LLC's Statement in Support of the Debtors' DIP Motion and MOTA Approval Motion, and Joinder to the Debtors' Omnibus Reply to Objections Filed Thereto (Filed 11/21/21) [Docket No. 320]

Objection Deadline: November 17, 2021 at 4:00 p.m. (ET)

Witness Information:

(a) The Debtors intend to offer the direct testimony of M. Benjamin Jones, the Debtors' Chief Restructuring Officer**, who will be testifying from his home in Pinehurst, North Carolina**. Mr. Jones will be alone during his testimony, and will have access to the following documents: (i) the First Day Declaration; (ii) the DIP Financing Declaration; (iii) the DIP Financing Motion; (iv) the MOTA Motion; and (v) all documents identified by the Debtors on their exhibit list. The Debtors anticipate that Mr. Jones may be cross examined by the various parties that filed objections to the DIP Financing Motion and the MOTA Motion.

Status: This matter will be going forward.

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Dated: Wilmington, Delaware
November **21**, 2021

MCDERMOTT WILL & EMERY LLP

/s/ David R. Hurst

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- and -

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