

**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.*,<sup>1</sup> )  
) Jointly Administered  
Debtors. )  
) **Related to Docket No. 217**  
)

**CERTIFICATION OF COUNSEL REGARDING MOTION OF DEBTORS FOR ENTRY OF ORDER (I) APPROVING GLOBAL SETTLEMENT AGREEMENT WITH LESSOR; (II) REJECTING LEASE AND SUBLEASE FOR CURRENT HEADQUARTERS; (III) FIXING AND ALLOWING LESSOR'S CLAIMS; (IV) ABANDONING CERTAIN PERSONAL PROPERTY TO LESSOR; AND (V) GRANTING RELATED RELIEF**

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

1. On November 10, 2021, the Debtors filed the *Motion of Debtors for Entry of Order (I) Approving Global Settlement Agreement with Lessor; (II) Rejecting Lease and Sublease for Current Headquarters; (III) Fixing and Allowing Lessor’s Claims; (IV) Abandoning Certain Personal Property to Lessor; and (V) Granting Related Relief* [Docket No. 217] (the “**Motion**”) with the United States Bankruptcy Court for the District of Delaware (the “**Court**”).

The Motion included a *Notice of Hearing on Motion of Debtors for Entry of Order (I) Approving Global Settlement Agreement with Lessor; (II) Rejecting Lease and Sublease for Current Headquarters; (III) Fixing and Allowing Lessor’s Claims; (IV) Abandoning Certain Personal Property to Lessor; and (V) Granting Related Relief* (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 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 24, 2021 (the “**Objection Deadline**”). The Objection Deadline was extended to November 29, 2021 at 4:00 p.m. (ET) for the Official Committee of Unsecured Creditors (the “**Committee**”).

3. 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**”).

4. The Debtors and the Committee have negotiated in good faith to resolve the Informal Objections, and the Debtors have amended the proposed form of order approving the relief requested in the Motion to reflect the agreement of the parties (the “**Revised Order**”). Proposed counsel to the Committee and counsel to 40 South Palafox Place, LLC have reviewed and do 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 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 30, 2021

**MCDERMOTT WILL & EMERY LLP**

/s/ David R. Hurst

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