

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

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In re:

GULF COAST HEALTH CARE, LLC, *et al.*,<sup>1</sup>

Debtors.

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)  
) Chapter 11  
)  
) Case No. 21-11336 (KBO)  
)  
) (Jointly Administered)  
)

**SUPPLEMENTAL DECLARATION OF CLIFFORD A. ZUCKER IN SUPPORT OF THE  
APPLICATION OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
OF GULF COAST HEALTH CARE, LLC, *ET AL.* FOR ENTRY OF AN ORDER  
AUTHORIZING THE EMPLOYMENT AND RETENTION OF FTI CONSULTING,  
INC. AS FINANCIAL ADVISOR *NUNC PRO TUNC TO OCTOBER 28, 2021***

Pursuant to 28 U.S.C. section 1746, Clifford Zucker declares as follows:

1. I am a Senior Managing Director with FTI Consulting, Inc., together with its wholly owned subsidiaries (“FTI”), an international consulting firm. I submit this declaration (the “First Supplemental Declaration”) to supplement my prior declaration (the “Original Declaration”) that was submitted in connection with the Committee’s<sup>2</sup> application to retain FTI at its financial advisor in these chapter 11 cases [Docket No. 229] (the “Application”). Unless otherwise noted, I have personal knowledge of the facts set forth herein.<sup>3</sup>

2. Following the filing of the Application and Original Declaration, the Office of the United States Trustee for Region 3 (the “U.S. Trustee”) requested additional information regarding the Application and Original Declaration. To provide the U.S. Trustee with the

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<sup>1</sup> There are 62 Debtors in these chapter 11 cases. A complete list of the Debtors and the last four digits of their federal tax identification numbers can be found on the website of the Debtors’ claims and noticing agent at <https://dm.epiq11.com/GulfCoastHealthCare>. The Debtors’ corporate headquarters and service address is 9511 Holsberry Lane, Suite B11, Pensacola, FL 32534.

<sup>2</sup> Capitalized terms used herein not otherwise defined have the meaning given to them in the Application or Original Declaration, as applicable.

<sup>3</sup> Certain of the disclosures herein relate to matters within the personal knowledge of other professionals at FTI and are based on information provided by them.

requested information, FTI discloses the following information in addition to the disclosures set forth in the Original Declaration:

- a) As stated in paragraph 2 of the Original Declaration, FTI conducted a review of its contacts with the Debtors their affiliates and certain entities holding large claims against or interests in the Debtors that were made reasonably known to FTI. This review, completed under my supervision, consisted of a query of an internal computer database containing names of individuals and entities that are present or recent former clients of FTI. This First Supplemental Declaration affirms, for avoidance of doubt, that the database referenced in the Original Declaration covers FTI Consulting, Inc. and its wholly owned subsidiaries globally, not only FTI Consulting, Inc.
- b) FTI is not seeking approval of an engagement letter or agreement in connection with the Committee's proposed retention of FTI at its financial advisor in these chapter 11 cases.

3. To the best of my knowledge, FTI does not hold or represent any interest adverse to the Debtors' estates, and believes it is eligible to represent the Committee under Bankruptcy Code section 1103(b).

4. If any new material relevant facts or relationships are discovered or arise, FTI will promptly file a supplemental declaration.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 30, 2021

/s/ Clifford Zucker  
Clifford Zucker, in his capacity as a  
Senior Managing Director with FTI Consulting, Inc.