

**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)
	)	(Jointly Administered)
Debtors.	)	<b>Ref. Docket Nos. 229, 370</b>

**CERTIFICATION OF COUNSEL REGARDING 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**

The undersigned, proposed counsel to the Official Committee of Unsecured Creditors (the “Committee”) appointed in the chapter 11 cases of Gulf Coast Health Care, LLC, *et al.*, hereby certifies as follows:

1. On November 11, 2021, the Committee filed 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* [Docket No. 229] (the “Application”).<sup>2</sup> The Application included a *Notice of Application* [Docket No. 229-3] (the “Notice”).

2. Pursuant to the Notice, 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 29, 2021 (the “Objection Deadline”).

---

<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 but not otherwise defined shall have those meanings set forth in the Application.

3. The Objection Deadline has passed for all parties, and no formal objections to the Application appear on the docket or were served upon undersigned counsel. However, the U.S. Trustee informally raised concerns regarding the Application (the “Informal Response”).

4. The Committee and the U.S. Trustee have negotiated in good faith to resolve the Informal Response, and the Committee has amended the proposed form of order approving the Application to reflect the agreement of the parties (the “Revised Order”). In addition, at the request of the U.S. Trustee, FTI Consulting Inc. has filed a supplemental declaration in support of the Application [Docket No. 370] (the “Supplemental Declaration”). Counsel to the U.S. Trustee has reviewed the Revised Order and the Supplemental Declaration 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**.

5. Accordingly, the Committee respectfully requests that the Court enter the Revised Order attached hereto as **Exhibit A** at the convenience of the Court.

*[Remainder of page intentionally left blank.]*

Dated: November 30, 2021

**GREENBERG TRAURIG, LLP**

*/s/ Dennis A. Meloro*

---

Dennis A. Meloro (No. 4435)  
The Nemours Building  
1007 North Orange Street, Suite 1200  
Wilmington, DE 19801  
Telephone: (302) 661-7000  
Facsimile: (302) 661-7360  
Email: MeloroD@gtlaw.com

- and -

Nancy A. Peterman (admitted *pro hac vice*)  
Eric J. Howe (admitted *pro hac vice*)  
77 West Wacker Drive, Suite 3100  
Chicago, IL 60601  
Telephone: (312) 456-8400  
Facsimile: (312) 456-8435  
Emails: PetermanN@gtlaw.com  
HoweE@gtlaw.com

**PROPOSED COUNSEL FOR THE OFFICIAL  
COMMITTEE OF UNSECURED CREDITORS**