IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

) Chapter 11
In re:)
) Case No. 21-11336 (KBO)
GULF COAST HEALTH CARE, LLC, et al., 1)
) (Jointly Administered)
Debtors.) Ref. Docket Nos. 228, 394
) Kei. Ducket Nos. 226, 394
)

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 GREENBERG TRAURIG, LLP AS COUNSEL NUNC PRO TUNC TO OCTOBER 27, 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 Greenberg Traurig, LLP as Counsel Nunc Pro Tunc to October 27, 2021 [Docket No. 228] (the "Application").² The Application included a Notice of Application [Docket No. 228-4] (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").

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.

² Capitalized terms used herein but not otherwise defined shall have those meanings set forth in the Application.

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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"). Moreover, at the

request of the U.S. Trustee, Greenberg Traurig LLP has filed a supplemental declaration in

support of the Application [Docket No.394] (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**.

[Remainder of page intentionally left blank.]

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

Dated: November 30, 2021 GREENBERG TRAURIG, LLP

/s/ Dennis A. Meloro

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- and -

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PROPOSED COUNSEL FOR THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS