

**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)
	)	
Debtors.	)	Jointly Administered
	)	
	)	<b>Related to Docket Nos. 235, 246, 395</b>
	)	

**CERTIFICATION OF COUNSEL REGARDING OSCEOLA SUPPLY'S  
MOTION FOR ALLOWANCE AND IMMEDIATE PAYMENT OF ADMINISTRATIVE  
EXPENSE CLAIM, PURSUANT TO 11 U.S.C. § 503(b)(9)**

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

1. On November 12, 2021, Osceola Supply, Inc. (“**Osceola**”) filed *Osceola Supply’s Motion for Allowance and Immediate Payment of Administrative Expense Claim, Pursuant to 11 U.S.C. § 503(b)(9)* [Docket No. 235] (the “**Motion**”). On November 12, 2021, Osceola filed an *Amended Notice of Osceola Supply’s Motion for Allowance and Immediate Payment of Administrative Expense Claim, Pursuant to 11 U.S.C. § 503(b)(9)* [Docket No. 246] (the “**Notice of Hearing**”).

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 by

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.

Osceola to November 29, 2021 at 4:00 p.m. (ET) for the Official Committee of Unsecured Creditors and to November 30, 2021 at 4:00 p.m. (ET) for the Debtors.

3. On November 30, 2021, the Debtors filed their *Limited Objection to Osceola Supply's Motion for Allowance and Immediate Payment of Administrative Expense Claim, Pursuant to 11 U.S.C. § 503(b)(9)* [Docket No. 395] (the “**Objection**”). No other objections to the Motion were filed.

4. The Debtors and Osceola have negotiated in good faith to resolve the Objection, and the parties have agreed on certain amendments to the proposed form of order approving the Motion that resolve their disputes with respect to the relief requested in the Motion (the “**Revised Order**”). Counsel to Osceola has reviewed and agreed 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 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  
December 1, 2021

**MCDERMOTT WILL & EMERY LLP**

/s/ David R. Hurst

David R. Hurst (I.D. No. 3743)  
1007 North Orange Street, 10th Floor  
Wilmington, Delaware 19801  
Telephone: (302) 485-3900  
Facsimile: (302) 351-8711  
Email: dhurst@mwe.com

- and -

Daniel M. Simon (admitted *pro hac vice*)  
Emily C. Keil (admitted *pro hac vice*)  
444 West Lake Street, Suite 4000  
Chicago, IL 60606  
Telephone: (312) 372-2000  
Facsimile: (312) 984-7700  
Email: dmsimon@mwe.com  
ekeil@mwe.com

*Counsel for Debtors and Debtors-in-Possession*