

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

In re:  GULF COAST HEALTH CARE, LLC, <i>et al.</i> , <sup>1</sup>  Debtors.	) ) ) ) ) ) )	Chapter 11  Case No. 21-11336 (KBO)  Jointly Administered  Related to Docket No. 163
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**SUPPLEMENTAL DECLARATION OF M. BENJAMIN JONES IN SUPPORT OF  
APPLICATION OF DEBTORS FOR ENTRY OF ORDER AUTHORIZING DEBTORS  
TO (I) RETAIN ANKURA CONSULTING GROUP, LLC TO PROVIDE DEBTORS A  
CHIEF RESTRUCTURING OFFICER AND CERTAIN ADDITIONAL PERSONNEL  
AND (II) DESIGNATE M. BENJAMIN JONES AS CHIEF RESTRUCTURING  
OFFICER AND RUSSELL A. PERRY AS ASSISTANT CHIEF RESTRUCTURING  
OFFICER FOR THE DEBTORS, EFFECTIVE AS OF THE PETITION DATE**

I, M. Benjamin Jones, declare that the following is true and correct to the best of my knowledge, information, and belief:

1. I am a Senior Managing Director of Ankura Consulting Group, LLC (“**Ankura**”), an advisory and consulting firm, with an office located at 485 Lexington Avenue, 10th Floor, New York, New York 10017. Except as otherwise noted, I have personal knowledge of the matters set forth herein, and if called and sworn as a witness, I could and would testify competently thereto.

2. I submit this supplemental declaration (this “**Supplemental Declaration**”) to supplement my initial declaration (the “**Initial Declaration**”), submitted as Exhibit B to the *Application of Debtors for Entry of Order Authorizing Debtors to (I) Retain Ankura*

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<sup>1</sup> 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.

*Consulting Group, LLC to Provide Debtors a Chief Restructuring Officer and Certain Additional Personnel and (II) Designate M. Benjamin Jones as Chief Restructuring Officer and Russell A. Perry as Assistant Chief Restructuring Officer for the Debtors, Effective as of the Petition Date [Docket No. 163] (the “**Application**”),<sup>2</sup> and to address certain comments provided by the Office of the United States Trustee for the District of Delaware (the “**U.S. Trustee**”).*

1. Details regarding the Additional Personnel, including their functions and hourly rates are set forth on **Exhibit A** attached hereto.

2. Pursuant to the June 2021 Engagement Letter with Gulf Coast Health Care Holdings, LLC (“**GCHCH**”), pursuant to which Ankura was retained to provide services to GCHCH and its subsidiaries and affiliates, Ankura received payment for services from Debtor Gulf Coast Health Care, LLC, to which Ankura was providing restructuring advisory services.

3. None of the entities listed on Schedule 2 to the Initial Declaration as Potential Connections or Related Parties accounted for 1% or more of Ankura’s gross revenue during calendar years 2019 or 2020.

4. Ankura is affiliated with certain other Ankura-branded entities, including its affiliates, subsidiaries, and parent entities, which entities are managed by the same executive team (such entities, the “**Ankura Entities**”). In connection with the preparation of the Initial Declaration, Ankura submitted the Potential Parties-In-Interest List for review in the computerized database system maintained by the Ankura Entities. The computerized database system maintained by the Ankura Entities is designed to include every matter on which each of

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<sup>2</sup> Capitalized terms used but not defined herein have the meanings ascribed to them in Application.

the Ankura Entities is now or has been engaged, as well as the names of the firm's current vendors.<sup>3</sup>

5. Ankura is a portfolio company of Madison Dearborn Partners, LLC ("**MDP**"). As such, the conflicts review process also includes a review of MDP and its funds that have an ownership interest in Ankura as well as MDP's other portfolio companies (the "**Portfolio Companies**") as of August 10, 2021, to determine if such companies appear on the list of Potential Parties-in-Interest.

6. The Portfolio Companies are under separate managerial control from Ankura and do not share any internal systems with Ankura. Ankura has no ability to access the Portfolio Companies' or MDP's systems or confidential information, nor do the Portfolio Companies or MDP have the ability to access Ankura's systems or confidential information. Certain MDP personnel serve as members of Ankura's board of directors (the "**MDP Directors**") and the MDP Directors may serve on boards of directors for certain of the Portfolio Companies. However, the MDP Directors are subject to confidentiality requirements and fiduciary duties, which prohibit and prevent the sharing of confidential information between companies for which they have board of director responsibilities. Despite the separation between Ankura and the Portfolio Companies, the Portfolio Companies and MDP entities are included in the computerized database and analyzed as part of the conflicts review process and any connections to the Potential Parties-in-Interest are disclosed in Ankura's Application.<sup>4</sup>

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<sup>3</sup> For companies and businesses acquired by Ankura, Ankura's computerized database system captures engagements that were active at the time of such acquisition, as well as any post-acquisition engagements.

<sup>4</sup> MDP may have other funds that do not have an ownership interest in Ankura. As these potential other funds are not connected to Ankura and Ankura has no access to non-public information related to such potential funds, these potential funds are not part of Ankura's computerized database and conflicts check process. Similarly, MDP may use certain non-operating holding companies to hold the equity of the Portfolio Companies ("**HoldCos**"). Information regarding such HoldCos is not shared with Ankura and Ankura has no access to systems or confidential information related to such HoldCos. As such, these HoldCos are not part of Ankura's

7. Ankura reviewed the results produced by the computerized database and, where entities on the Potential Parties-in-Interest List appeared in such database, the team reviewed those entities to determine the relationship Ankura has with such entities, as provided in the Application. All such relationships were disclosed in the Initial Declaration. As set forth in the Initial Declaration, Ankura and its personnel may have relationships personally or in the ordinary course of business with certain vendors, professionals, and other parties-in-interest that may be involved in the Debtors' Chapter 11 Cases; such relationships are unrelated to these Chapter 11 Cases and do not adversely affect the Debtors.

8. To the best of Ankura's knowledge, Ankura remains a "disinterested person" within the meaning of Bankruptcy Code section 101(14) and neither holds nor represents any interest adverse to the Debtors or their estates.

9. It remains to the best of my knowledge that neither Ankura nor any of its professional personnel hold or represent any interest materially adverse to the Debtors' estates with respect to any matter upon which Ankura is to be engaged. To the extent that Ankura becomes aware of any additional relationships and/or connections that may be relevant to Ankura's representation of the Debtors, an additional supplemental declaration will be filed.

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computerized database and conflicts check process. As noted above, however, all Portfolio Companies are part of such database and conflicts process, regardless of ownership structure.

Pursuant to section 1746 of title 28 of the United States Code, I declare under penalty of perjury that the foregoing is true and correct.

Dated: December 15, 2021

/s/ M. Benjamin Jones

Name: M. Benjamin Jones

Title: Senior Managing Director