

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, <i>et al.</i> , ¹)	
)	Jointly Administered
Debtors.)	
)	Related to Docket Nos. 163, 574
)	

CERTIFICATION OF COUNSEL REGARDING 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

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

1. On November 2, 2021, the Debtors filed the *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* [Docket No. 163] (the “Application”) with the United States Bankruptcy Court for the District of Delaware (the “Court”). The Application included a *Notice of Hearing on Application of Debtors for Entry of Order Authorizing Debtors to (I) Retain Ankura Consulting Group, LLC to Provide Debtors a Chief*

¹ 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.

*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 (the “**Notice of Hearing**”).*

2. On December 15, 2021, the Debtors filed the *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* [Docket No. 574].

3. Pursuant to the Notice of Hearing, 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 16, 2021 (the “**Objection Deadline**”). The Objection Deadline was extended until December 15, 2021 at 4:00 p.m. (ET) for the Office of the United States Trustee for the District of Delaware (the “**U.S. Trustee**”).

4. The Objection Deadline has passed and no 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 Objections**”).

5. The Debtors and the U.S. Trustee have negotiated in good faith to resolve the Informal Objections, and the Debtors have 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, Mr. M. Benjamin Jones has filed a supplemental declaration in support of the Application [Docket No. 574] (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 order submitted with the Application is attached hereto as **Exhibit B**.

6. 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 15, 2021

MCDERMOTT WILL & EMERY LLP

/s/ David R. Hurst

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