

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

In re:) Chapter 11
)
) Case No. 21-11336 (KBO)
GULF COAST HEALTH CARE, LLC, *et al.*,¹)
) Jointly Administered
Debtors.)
) **Related to Docket No. 501**
)

**CERTIFICATION OF COUNSEL REGARDING
MOTION OF DEBTORS FOR ENTRY OF ORDER (I) ESTABLISHING
ADMINISTRATIVE CLAIMS BAR DATE, (II) APPROVING FORM, MANNER,
AND SUFFICIENCY OF NOTICE THEREOF, AND (III) APPROVING
PROOF OF ADMINISTRATIVE CLAIM FORM**

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

1. On December 3, 2021, the Debtors filed the *Motion of Debtors for Entry of Order (I) Establishing Administrative Claims Bar Date, (II) Approving Form, Manner, and Sufficiency of Notice Thereof, and (III) Approving Proof of Administrative Claim Form* [Docket No. 501] (the “**Motion**”) with the United States Bankruptcy Court for the District of Delaware (the “**Court**”). The Motion included a *Notice of Hearing on Motion of Debtors for Entry of Order (I) Establishing Administrative Claims Bar Date, (II) Approving Form, Manner, and Sufficiency of Notice Thereof, and (III) Approving Proof of Administrative Claim Form* (the “**Notice of Hearing**”).

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.

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 December 13, 2021 (the “**Objection Deadline**”). The Objection Deadline was extended to December 15, 2021 at 4:00 p.m. (ET) for the Official Committee of Unsecured Creditors (the “**Committee**”).

3. The Objection Deadline has passed and no objections to the Motion appear on the docket or were served upon undersigned counsel. Moreover, counsel to the Committee has confirmed that the Committee does not intend to file an objection or other responsive pleading to the Motion. Although no formal objections to the Motion were filed, the Patient Care Ombudsman informally raised concerns regarding the Motion (the “**Informal Objections**”).

4. The Debtors and the Patient Care Ombudsman have negotiated in good faith to resolve the Informal Objections, and the Debtors have amended the proposed form of order approving the relief requested in the Motion to reflect the agreement of the parties (the “**Revised Order**”). Counsel to the Patient Care Ombudsman has reviewed 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 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 16, 2021

MCDERMOTT WILL & EMERY LLP

/s/ David R. Hurst

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