

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

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In re:

GULF COAST HEALTH CARE, LLC, *et al.*,<sup>1</sup>

Debtors.

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)  
) Chapter 11  
)

) Case No. 21-11336 (KBO)  
)

) Jointly Administered  
)  
)

**CERTIFICATION OF COUNSEL REGARDING ORDER  
APPROVING STIPULATION BETWEEN DEBTORS AND OMNICARE  
REGARDING FILING OF CONSOLIDATED PROOF OF CLAIM**

The undersigned counsel to the above-captioned debtors and debtors-in-possession (the “**Debtors**”),<sup>2</sup> hereby certifies as follows:

1. On October 14, 2021 (the “**Petition Date**”), each Debtor commenced a case by filing a petition for relief under chapter 11 of title 11 of the United States Code (the “**Bankruptcy Code**”). The Chapter 11 Cases are being jointly administered for procedural purposes only. The Debtors continue to operate their businesses and manage their properties as debtors and debtors-in-possession pursuant to Bankruptcy Code sections 1107(a) and 1108.

2. On October 25, 2021, the Office of the United States Trustee for the District of Delaware (the “**U.S. Trustee**”) appointed an Official Committee of Unsecured Creditors in the Chapter 11 Cases (the “**Committee**”) pursuant to Bankruptcy Code section 1102(a) [Docket No. 111]. No trustee or examiner has been appointed in the Chapter 11 Cases.

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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.

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

3. On November 12, 2021, the Court entered an order that, among other things, set January 7, 2022 as the general bar date for filing proofs of claim [Docket No. 244] (the “**Bar Date Order**”). The Bar Date Order approved instructions for filing proofs of claim (the “**Filing Instructions**”). The Debtors and Omnicare, Inc. and certain of its affiliates (collectively, “**Omnicare**”) have negotiated a stipulation (the “**Stipulation**”) which addresses, among other things, Omnicare’s ability to file a consolidated proof of claim in the Chapter 11 Cases. A proposed form of order approving the Stipulation is attached hereto as **Exhibit A** (the “**Proposed Order**”). The Stipulation is attached as Exhibit 1 to the Proposed Order.

4. The Debtors have circulated the Stipulation to counsel to the Official Committee of Unsecured Creditors (the “**Committee**”) and the Committee indicated to the Debtors that it does not object to entry of an order approving the Stipulation. The Debtors have also circulated the Stipulation to counsel to the United States Trustee for the District of Delaware (the “**U.S. Trustee**”) and the U.S. Trustee indicated to the Debtors that it is not taking a position regarding the Stipulation.

*[Remainder of Page Intentionally Left Blank]*

Accordingly, the Debtors respectfully request that the Court enter the Proposed Order attached hereto as **Exhibit A** at the convenience of the Court.

Dated: Wilmington, Delaware  
December 22, 2021

**MCDERMOTT WILL & EMERY LLP**

/s/ David R. Hurst

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