

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

-----○
:
In re: :

: Chapter 11
:

AMERICAN EAGLE DELAWARE HOLDING
COMPANY LLC, *et al.*,¹

: Case No. 22-10028 (JKS)
: (Joint Administration Requested)
:

Debtors.

○ Re: D.I. 1

**CONCURRED IN APPLICATION REGARDING
ORDER PURSUANT TO 11 U.S.C. § 333 AND FED. R. BANKR. P. 2007.2
DIRECTING THE APPOINTMENT OF A PATIENT CARE OMBUDSMAN**

The undersigned counsel for the United States Trustee for the District of Delaware (the “U.S. Trustee”) certifies as follows:

1. On January 14, 2022, the above-captioned debtors (the “Debtors”) filed chapter 11 petitions in this Court. The chapter 11 petitions indicate that the Debtors are a healthcare business as defined in 11 U.S.C. § 101(27A).
2. The U.S. Trustee has discussed the appointment of a patient care ombudsman in the Debtors’ cases pursuant to 11 U.S.C. § 333 with Debtors’ proposed counsel.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number are: American Eagle Delaware Holding Company LLC (4248), American Eagle Palmer Park LLC (d/b/a Lark Springs) (5908), American Eagle Tuskawilla LLC (d/b/a Palmetto Landing) (9489), American Eagle Leesburg AL LLC (d/b/a Vista Lake) (6258), American Eagle Brandon LLC (d/b/a Aldea Green) (6168), American Eagle Leesburg MC LLC (d/b/a Vista Lake) (7577), American Eagle Venice Island LLC (d/b/a Maris Pointe) (1695), American Eagle Titusville LLC (d/b/a Crescent Wood) (7210), American Eagle Island Lake LLC (d/b/a Cascade Heights) (1975), American Eagle Eau Gallie LLC (d/b/a Greenwood Place) (1483), American Eagle Owatonna AL LLC (d/b/a Timberdale Trace) (0555), American Eagle Hanceville LLC (d/b/a Monarch Place) (8173), American Eagle Ravenna LLC (d/b/a Vista Veranda) (9216), American Eagle Newark LLC (d/b/a Hearth Brook) (7125), American Eagle Kingston LLC (d/b/a Sycamore Springs) (4882), American Eagle Hendersonville LLC (d/b/a Red Cedar Glen) (3669), and American Eagle Pleasant Prairie LLC (d/b/a Robin Way) (9483). The Debtors’ mailing address is American Eagle Delaware Holding Company LLC, c/o American Eagle Lifecare Corporation, 3819 Hawk Crest Rd., Ann Arbor, MI 48103.

3. The U.S. Trustee has circulated this concurred in application and the form of order attached hereto as Exhibit A to Debtors' proposed counsel. The Debtors and the U.S. Trustee consent to entry of the order.

4. The U.S. Trustee submits that, pursuant to Fed. R. Bankr. P. 2007.2, a motion is required only if the Court is asked not to appoint a patient care ombudsman in a case. Because the parties are consenting to the appointment of a patient care ombudsman, no motion is needed under Fed. R. Bankr. P. 2007.2. If the Court determines that a motion is needed, then the U.S. Trustee intends to file a motion to be heard at the Court's earliest convenience.

WHEREFORE, the U.S. Trustee respectfully requests that the Court consider the proposed form of order attached hereto as Exhibit A at its earliest convenience.

**ANDREW R. VARA
UNITED STATES TRUSTEE,
REGIONS 3 & 9**

January 14, 2022

BY: /s/ Joseph J. McMahon, Jr.
Joseph J. McMahon, Jr.
Trial Attorney
Office of the United States Trustee
J. Caleb Boggs Federal Building
844 King Street, Room 2207, Lockbox 35
Wilmington, DE 19801
(302) 573-6491
(302) 573-6497 (fax)
joseph.mcmahon@usdoj.gov