

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X	
	:
In re:	:
	:
SAINT VINCENTS CATHOLIC MEDICAL	:
CENTERS OF NEW YORK, <u>et al.</u> <sup>1</sup>	:
	:
Debtors.	:
	:
-----X	
	Chapter 11
	Case No. 10-11963 (CGM)
	Jointly Administered
	Ref. Docket Nos. 888, 890-891

**AFFIDAVIT OF SERVICE**

STATE OF NEW YORK     )  
                                  ) ss.:  
COUNTY OF NEW YORK    )

PANAGIOTA MANATAKIS, being duly sworn, deposes and says:

1. I am employed as a Noticing Coordinator by Epiq Bankruptcy Solutions, LLC, located at 757 Third Avenue, New York, New York 10017. I am over the age of eighteen years and am not a party to the above-captioned action.
2. On September 17, 2010, I caused to be served the:
  - a. "Seventh Omnibus Notice of Rejection of Unexpired Leases and Executory Contracts," dated September 17, 2010 [Docket No. 888], (the "Seventh Omnibus Rejection Notice"),
  - b. *Letter to the Honorable Cecelia G. Morris*, dated September 17, 2010, a copy of which is annexed hereto as Exhibit A, (the "Letter"),
  - c. *Response to Letter to the Honorable Cecelia G. Morris*, dated September 17, 2010 [Docket No. 890], (the "Response Letter"), and
  - d. "Notice of Presentment of the Debtors for Entry of an Order Approving Stipulation by and Between the Debtors and Pension Benefit Guaranty Corporation Permitting Pension Benefit Guaranty Corporation to File Consolidated Claims Under a Single Case Number," dated September 17, 2010, to which is attached the "Stipulation Permitting Pension Benefit Guaranty Corporation to File Consolidated Claims Under

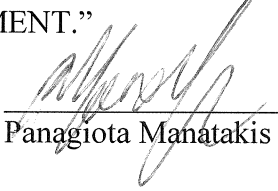
---

<sup>1</sup> In addition to SVCMC, the Debtors are as follows: (i) 555 6th Avenue Apartment Operating Corporation; (ii) Bishop Francis J. Mugavero Center for Geriatric Care, Inc.; (iii) Chait Housing Development Corporation; (iv) Fort Place Housing Corporation; (v) Pax Christi Hospice, Inc.; (vi) Sisters of Charity Health Care System Nursing Home, Inc. d/b/a St. Elizabeth Ann's Health Care & Rehabilitation Center; (vii) St. Jerome's Health Services Corporation d/b/a Holy Family Home; and (viii) and SVCMC Professional Registry, Inc. There are certain affiliates of SVCMC who are not Debtors.

a Single Case Number,” dated September 17, 2010 [Docket No. 891], (the “PGBC Notice”),

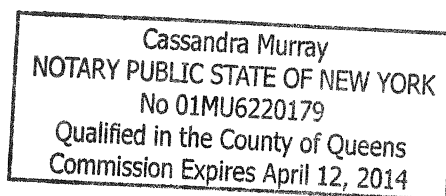
by causing true and correct copies of the:

- i. Seventh Omnibus Rejection Notice, Letter, Response Letter and PGBC Notice, to be enclosed securely in separate postage pre-paid envelopes and delivered via first class mail to the Special Service List, parties identified on the annexed Exhibit B,
  - ii. PGBC Notice, enclosed securely in separate postage pre-paid envelopes and delivered via first class mail to the General Service List, parties identified on the annexed Exhibit C,
  - iii. Seventh Omnibus Rejection Notice, Letter, Response Letter and PGBC Notice, to be delivered via electronic mail to the Special Service List, parties identified on the annexed Exhibit D,
  - iv. PGBC Notice, to be delivered via electronic mail to the General Service List, parties identified on the annexed Exhibit E,
  - v. Letter and Response Letter, to be delivered via electronic mail to those parties listed on the annexed Exhibit F,
  - vi. Seventh Omnibus Rejection Notice, to be enclosed securely in separate postage pre-paid envelopes and delivered via first class mail to those parties listed on the annexed Exhibit G,
  - vii. PGBC Notice, to be enclosed securely in separate postage pre-paid envelopes and delivered via first class mail to the party listed on the annexed Exhibit H, and
  - viii. Letter and Response Letter, to be enclosed securely in separate postage pre-paid envelopes and delivered via first class mail to those parties listed on the annexed Exhibit I.
3. All items served by mail or overnight courier included the following legend affixed on the envelope: “LEGAL DOCUMENTS ENCLOSED: PLEASE DIRECT TO ATTENTION OF ADDRESSEE, PRESIDENT OR LEGAL DEPARTMENT.”

  
Panagiota Manatakis

Sworn to before me this  
22<sup>nd</sup> day of September, 2010

  
Notary Public



## **EXHIBIT A**

KRAMER LEVIN NAFTALIS & FRANKEL LLP

P. BRADLEY O'NEILL  
PARTNER  
PHONE 212-715-7583  
FAX 212-715-8000  
BONEILL@KRAMERLEVIN.COM

September 17, 2010

BY EMAIL AND ECF

The Honorable Cecelia G. Morris  
United States Bankruptcy Court  
Southern District of New York  
355 Main Street  
Poughkeepsie, New York 12601-3315

Re: In re Saint Vincents Catholic Medical Centers of  
New York, et al. (10-11963) (CGM)

Dear Judge Morris:

After today's conference call with the Court, the Debtors received additional comments from Siemens on the form of order implementing the rejection of the Siemens Agreement. Based on those comments, it appears that the parties have reached agreement on the form of the order, with two important exceptions—one of which relates to ongoing patient care.

This letter explains the areas of disagreement and submits a form of order that the Debtors believe is appropriate. The Debtors anticipate that Siemens will submit a competing form of order.

The first area of disagreement concerns paragraph 2 of the form of order, which purports to limit Siemens' obligation to perform under the Siemens Agreement to those actions spelled out in the order, *unless the parties otherwise agree or the Court orders otherwise in the absence of agreement*. Siemens objects to the final clause which allows the parties to seek this Court's relief if there is a disagreement between the parties. The Debtors believe that a limitation of the right to seek further assistance from the Court—which is tantamount to a limitation on the Court's continuing authority over this matter—is unwarranted and inappropriate.

The second area of disagreement concerns paragraph 5 of the form of order and is a matter directly affecting patient care. That provision preserves the Debtors' ability to seek Siemens' cooperation to ensure proper access to certain patient cardiological medical records that are stored in the "Syngo" system, a proprietary application of Siemens. The Debtors presently lack the expertise to extract and convert these records to long term storage and thereby to preserve the ability of their patients to access these records both in the short and longer term.

September 17, 2010

Page 2

In addition, should the Debtors' current access be impeded because of a problem with Siemens' propriety software, the Debtors may require Siemens' cooperation to resolve such problem to ensure that patients continue to have access to their cardiology records. Paragraph 5 merely reserves the right of the Debtors to seek this Court's future assistance, in the absence of an agreement between the parties, to make sure that patients can continue to access their cardiology records. In other words, no affirmative relief is being sought now; instead, the Debtors wish merely to preserve this Court's ability to intervene in any potential future dispute between the parties. Because the Debtors believe this is a patient safety issue, the Debtors have copied counsel to the Patient Care Ombudsman on this letter.

For the foregoing reasons, the Court should enter the form of order enclosed with the letter.

Respectfully submitted,

P. Bradley O'Neill

PO:ep

Enclosure

cc: Derek J. Baker, Esq.  
Claudia Z. Springer, Esq.  
David Botter, Esq.  
Sarah Schultz, Esq.  
David Neier, Esq.  
Mark I. Fishman, Esq.

## **FORM OF ORDER**

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

-----	X	
In re:	:	Chapter 11
	:	
SAINT VINCENTS CATHOLIC MEDICAL	:	Case No. 10-11963 (CGM)
CENTERS OF NEW YORK, <u>et al.</u> ,	:	
	:	
Debtors.	:	Jointly Administered
-----	X	

**ORDER REJECTING AN EXECUTORY CONTRACT  
BETWEEN SIEMENS MEDICAL SOLUTIONS USA, INC.  
AND SAINT VINCENTS CATHOLIC MEDICAL CENTERS OF NEW YORK**

WHEREAS, on July 9, 2010, Siemens Medical Solutions USA, Inc. ("**Siemens**") filed a motion for an order (i) compelling assumption or rejection of the Agreement, dated as of October 1, 2001, by and between Saint Vincents Catholic Medical Centers of New York ("**SVCMC**") and Siemens, and any and all amendments, modifications and supplements thereto (collectively, the "**Siemens Agreement**"), (ii) directing the Debtors to make all postpetition payments due under and in the amount set forth in the Siemens Agreement, and (iii) allowing the administrative expense claim of Siemens (the "**Siemens Motion**");

WHEREAS, although there are still various disputes concerning certain allegations set forth in the Siemens Motion, the Debtors have determined to reject the Siemens Agreement pursuant to section 365(d)(2) of title 11 of the United States Code (the "**Bankruptcy Code**") effective as of September 30, 2010.

WHEREAS, upon the record of a hearing held on September 16, 2010 and a telephonic conference with the Court held on September 17, 2010, the Court has determined that rejection of the Siemens Agreement is in the best interests of the Debtors, their estates and creditors and all parties-in-interest; and after due deliberation and sufficient cause appearing therefore;

IT IS HEREBY ORDERED THAT:

1. The Debtors are authorized to and hereby reject the Siemens Agreement pursuant to section 365(d)(2) of the Bankruptcy Code effective as of September 30, 2010 (**"Rejection Date"**).

2. After September 17, 2010, except as provided for in paragraph 4 of this Order, Siemens shall not be obligated to perform any other services under the Siemens Agreement, unless Siemens and the Debtors otherwise agree or Siemens is otherwise ordered by the Court.

3. After the Rejection Date, Siemens shall be authorized to remove from SVCMC's Manhattan hospital facility, in a commercially reasonable manner and at its own expense, the equipment listed on **Exhibit A** hereto (the **"Siemens Equipment"**), to the extent such equipment is present at such facility; provided, however, that nothing in this Order shall be construed as the Debtors' representation that any Siemens Equipment is present at SVCMC's Manhattan hospital facility (or any of their other facilities). Simultaneously with the removal of the Siemens Equipment, Siemens shall provide to the Debtors' counsel a written acknowledgment of removal, including an itemized description of such removed Siemens Equipment.

4. By the Rejection Date, Siemens shall provide SVCMC with the data, information and documents outlined on **Exhibit B** hereto. The Debtors shall reasonably cooperate with Siemens to facilitate the deliveries requested on Exhibit B. A representative of the Debtors shall acknowledge receipt of each item identified on Exhibit B.

5. Notwithstanding anything in this Order to the contrary, this Order is without prejudice to the rights of the Debtors' estates to seek to obtain Siemens' cooperation (in the absence of any agreement between the parties) concerning the Syngo Cardiology application used by the Debtors, including securing (i) current access to such patient medical records and (ii)



the long term storage of such patient medical records as may be approved by further order of the Court.

6. Siemens shall be entitled to payment as an administrative expense for the services performed under paragraph 4 of this Order in an amount (together with any other administrative claims of Siemens against the Debtors' estates) to be determined by the Court at a hearing on a future date to be mutually determined by Siemens and the Debtors.

7. If Siemens has any claims for damages as a result of the Debtors' rejection of the Siemens Agreement, such claims shall be forever barred unless Siemens files a proof of claim with respect to such claims so as to be actually received by the Debtors by October 30, 2010 at 5:00 p.m. (eastern) at the following address: if by first class mail, to Saint Vincents Catholic Medical Centers of New York (2010) – Claims Processing Center, c/o Epiq Bankruptcy Solutions, LLC, Grand Central Station, P.O. Box 4834, New York, NY 10163-4834; or if by hand delivery or overnight mail to Saint Vincents Catholic Medical Centers of New York (2010) – Claims Processing Center, c/o Epiq Bankruptcy Solutions, LLC, 757 Third Avenue, 3rd Floor, New York, NY 10017.

8. The Court shall retain jurisdiction to enforce the terms of this Order.

Dated: New York, New York  
As of September \_\_, 2010

THE HONORABLE CECILIA G. MORRIS  
UNITED STATES BANKRUPTCY JUDGE

**EXHIBIT A**

**Siemens Equipment**

Please see attached

<u>Warehouse</u> <u>id</u>	<u>Warehouse Description</u>	<u>Warehouse</u> <u>Type id</u>	<u>Bin Code</u> <u>id</u>	<u>part id</u>	<u>Part Description</u>	<u>IsUsable</u>	<u>qty</u>	<u>Prod Clas</u> <u>s id</u>
SMSNYC	ESL- St Vincent Catholic Medical CT	SITE SERVICE WAREHOUSE	GOOD	IB06P3609	10/100 EHTERNET SERV ADPTR	Y	1	ADP
SMSNYC	ESL- St Vincent Catholic Medical CT	SITE SERVICE WAREHOUSE	GOOD	IB01R3119	SYSTEM BOARD F/NETVISTA	Y	1	BRD
SMSNYC	ESL- St Vincent Catholic Medical CT	SITE SERVICE WAREHOUSE	GOOD	IB06P5741	RAID CONTROLLER 4LX UL160 F/ NETFINITY	Y	1	BRD
SMSNYC	ESL- St Vincent Catholic Medical CT	SITE SERVICE WAREHOUSE	GOOD	IB09N9540	4L SERVERRAID CONTROLLER F/ NETFINITY	Y	1	BRD
SMSNYC	ESL- St Vincent Catholic Medical CT	SITE SERVICE WAREHOUSE	GOOD	IB23K4455	PLANAR BOARD (533MHZ BUS)	Y	1	BRD
SMSNYC	ESL- St Vincent Catholic Medical CT	SITE SERVICE WAREHOUSE	GOOD	IB23K4457	MOTHERBOARD F/8671Y11	Y	1	BRD
SMSNYC	ESL- St Vincent Catholic Medical CT	SITE SERVICE WAREHOUSE	GOOD	IB24P6893	VOLTAGE REGULATOR MODULE	Y	1	BRD
SMSNYC	ESL- St Vincent Catholic Medical CT	SITE SERVICE WAREHOUSE	GOOD	IB25P4058	16MB VIDEO CARD NVIDIA AGP4X F/NETVISTA	Y	2	BRD
SMSNYC	ESL- St Vincent Catholic Medical CT	SITE SERVICE WAREHOUSE	GOOD	IB48P9071	SYSTEM BOARD	Y	1	BRD
SMSNYC	ESL- St Vincent Catholic Medical CT	SITE SERVICE WAREHOUSE	GOOD	IB49P2010	VRM 9.1	Y	1	BRD
SMSNYC	ESL- St Vincent Catholic Medical CT	SITE SERVICE WAREHOUSE	GOOD	IB74P4407	VRM CARD	Y	1	BRD
SMSNYC	ESL- St Vincent Catholic Medical CT	SITE SERVICE WAREHOUSE	GOOD	IB06P5711	36.4GB HDD 10K-4FC HOT SWAP F/ SERVER	Y	2	DRV
SMSNYC	ESL- St Vincent Catholic Medical CT	SITE SERVICE WAREHOUSE	GOOD	IB06P5758	18.2GB HDD 10 ULTRA SCSI F/ SERVER	Y	1	DRV
SMSNYC	ESL- St Vincent Catholic Medical CT	SITE SERVICE WAREHOUSE	GOOD	IB19K0613	9.1GB HARD DRIVE 10K W/TRAY	Y	1	DRV
SMSNYC	ESL- St Vincent Catholic Medical CT	SITE SERVICE WAREHOUSE	GOOD	IB19K0614	18.2GB HARD DRIVE F/NETFINITY server	Y	2	DRV
SMSNYC	ESL- St Vincent Catholic Medical CT	SITE SERVICE WAREHOUSE	GOOD	IB32P0729	36.4GB HDD 10K SCSI HS F/STORA GE	Y	2	DRV
SMSNYC	ESL- St Vincent Catholic Medical CT	SITE SERVICE WAREHOUSE	GOOD	IB32P0731	146.8GB 10K SCSI HDD F/XSERIES 345 SERVER	Y	1	DRV
SMSNYC	ESL- St Vincent Catholic Medical CT	SITE SERVICE WAREHOUSE	GOOD	IB37L7205	18GB HDD SCSI U160	Y	1	DRV
SMSNYC	ESL- St Vincent Catholic Medical CT	SITE SERVICE WAREHOUSE	GOOD	IB37L7206	36.4GB HDD F/SERVER PUR@ CPS	Y	1	DRV

SMSNYC	ESL- St Vincent Catholic Medical CT	SITE SERVICE WAREHOUSE	GOOD	IB90P1309	73.4G HD FRU 10K RPM U320 SCSI HOTSWAP	Y	2	DRV
SMSNYC	ESL- St Vincent Catholic Medical CT	SITE SERVICE WAREHOUSE	GOOD	IB90P1310	146.4GB HARD DRIVE 10,000 RPM ULTRA SCSI P@TKO	Y	2	DRV
SMSNYC	ESL- St Vincent Catholic Medical CT	SITE SERVICE WAREHOUSE	GOOD	IB90P1311	300GB HARD DRIVE	Y	2	DRV
SMSNYC	ESL- St Vincent Catholic Medical CT	SITE SERVICE WAREHOUSE	GOOD	IB09N4306	256MB PC2100 ECC MEMORY F/XSER IES	Y	2	MEM
SMSNYC	ESL- St Vincent Catholic Medical CT	SITE SERVICE WAREHOUSE	GOOD	IB09N4307	512MB MEMORY F/INTELLSTATION	Y	2	MEM
SMSNYC	ESL- St Vincent Catholic Medical CT	SITE SERVICE WAREHOUSE	GOOD	IB10K0019	128MB MEMORY PC 133 ECC F/ INTELLISTATION	Y	2	MEM
SMSNYC	ESL- St Vincent Catholic Medical CT	SITE SERVICE WAREHOUSE	GOOD	IB10K0021	256MB PC 133 ECC MEMORY F/INTE LLSTAION	Y	1	MEM
SMSNYC	ESL- St Vincent Catholic Medical CT	SITE SERVICE WAREHOUSE	GOOD	IB33L3321	128MB PC 133 ECC MEMORY F/X SERIES	Y	2	MEM
SMSNYC	ESL- St Vincent Catholic Medical CT	SITE SERVICE WAREHOUSE	GOOD	IB33L3323	256MB MEMORY DIMM	Y	1	MEM
SMSNYC	ESL- St Vincent Catholic Medical CT	SITE SERVICE WAREHOUSE	GOOD	IB33L3325	512MB MEMORY MODULE PC133 ECC F/IP STORAGE	Y	1	MEM
SMSNYC	ESL- St Vincent Catholic Medical CT	SITE SERVICE WAREHOUSE	GOOD	IB39M5808	1X 1GB RDIMM	Y	1	MEM
SMSNYC	ESL- St Vincent Catholic Medical CT	SITE SERVICE WAREHOUSE	GOOD	IB73P2872	512 MB PC2100 CL2.5 ECC DDR	Y	2	MEM
SMSNYC	ESL- St Vincent Catholic Medical CT	SITE SERVICE WAREHOUSE	GOOD	CQ351070-001	250W POWER SUPPLY	Y	1	POW
SMSNYC	ESL- St Vincent Catholic Medical CT	SITE SERVICE WAREHOUSE	GOOD	IB24P6898	340W POWER SUPPLY F/INTELLISTA TION	Y	1	POW
SMSNYC	ESL- St Vincent Catholic Medical CT	SITE SERVICE WAREHOUSE	GOOD	IB24P6899	POWER SUPPLY	Y	1	POW
SMSNYC	ESL- St Vincent Catholic Medical CT	SITE SERVICE WAREHOUSE	GOOD	IB49P2033	350W POWER SUPPLY F/X SERIES PUR@ CPS	Y	3	POW
SMSNYC	ESL- St Vincent Catholic Medical CT	SITE SERVICE WAREHOUSE	GOOD	IB49P2090	332 WATT POWER SUPPLY	Y	1	POW
SMSNYC	ESL- St Vincent Catholic Medical CT	SITE SERVICE WAREHOUSE	GOOD	IB74P4496	340W POWER SUPPLY F/INTELLISTA TION	Y	1	POW
SMSNYC	ESL- St Vincent Catholic Medical CT	SITE SERVICE WAREHOUSE	GOOD	CQ154871-001	40/80 DLT TAPE DRIVE INTERNAL	Y	2	STR

## **EXHIBIT B**

### **Transition Services<sup>1</sup>**

#### **Network Group:**

1. Grant administrative access to Kane Edupuganti's account with respect to all networking devices at all sites.
2. Provide a detailed list of the Network inventory, broken down by site, serial numbers, model numbers, IOS versions, Logins and passwords.
3. Provide a detailed Network layout (Full blown Visio Diagrams).
4. Provide detailed documentation of core switches at the Manhattan Hospital and data center and their configurations.
5. Provide detailed documentation of the PACS network and PACS switches and a diagram
6. Provide detailed documentation of server farm switches and their configurations.
7. Provide detailed documentation of blade switches and their configurations.
8. Provide detailed documentation of ASA Firewall, including details of Site to site VPNs in play.
9. Provide documentation of DMZ and other interfaces and associated subnets etc.
10. Provide detailed documentation of Cisco VPN Concentrator.
11. Provide detailed documentation of the TD bank / CDI network refresh inventory broken down by site and a statement whether the equipment can be returned.
12. Provide detailed documentation of Iprism Web Filtering and its configuration.
13. Provide login procedures and passwords for each network device in production.
14. Provide detailed documentation of Cisco Works and MARS.
15. Provide detailed documentation of ISA and TACACS.
16. Provide a master login and password list for all devices.
17. Provide detailed documentation of all sites in production with respect to their EVPL connectivity, circuits ID's, equipment at each site, logins and passwords, configuration of all network related devices.
18. Provide a list of all vendors that have access to SVCMC's network (including contact info, company name, tunnel details, login info and what do they have access to and how and why).
19. Provide details of the Right fax configuration and logins and passwords.

#### **Server Group:**

20. Provide a detailed inventory of all servers both in the data center and remote sites.
21. Provide a master login and password list for all the servers.
22. Provide detailed documentation of the SAN.
23. Provide detailed documentation of the VMware.

---

<sup>1</sup> Any capitalized terms not defined herein shall have the meaning ascribed to them in the Siemens Agreement and ordinary course of dealings between SVCMC and Siemens.

24. Provide detailed documentation of the backup infrastructure for x86.
25. Provide a detailed Rack layout of the data center.
26. Provide detailed documentation of the blade center.
27. Provide detailed documentation of the Share Point.
28. Provide detailed documentation of the Exchange Cluster.
29. Provide detailed documentation of the File cluster.
30. Provide detailed documentation of the SQL cluster.
31. Provide detailed documentation of the Essential Success Factors For Disaster Recovery Plan for IT (§ 3.6 of the Service Level Agreement) .
32. Provide detailed documentation of the Active Directory Infrastructure.
33. Provide detailed documentation of the print server infrastructure.
34. Provide detailed documentation of the IP schemes.
35. Provide detailed documentation of DHCP and DNS and WINS.
36. Provide the IP Subnet breakdown document.
37. Provide the standard server build documents.
38. Provide the server deployment process document.
39. Provide the server decommission document.
40. Provide detailed documentation of server scheduled updates.
41. Provide a list of all vendors that have access to our servers and their associated user accounts.
42. Provide detailed documentation of VPS.
43. Provide detailed documentation of RAS.
44. Provide documentation of all automated FTP and or other types of scheduled unmanned tasks running in our environment.
45. Provide detailed documentation of Group Policy infrastructure.
46. Provide detailed documentation of PANO deployment and management.
47. Provide detailed documentation of Trend Micro Ant Virus.
48. Provide a list of all SVCMC-owned printers.

**Unix Servers:**

49. Provide detailed inventory of all Unix servers, both in data center and remote sites, including OS versions, hardware details, manufacturer, model, make, serial number and applications running on such servers.
50. Provide a list of the master login information and passwords for all Unix servers.
51. Provide detailed documentation of all Unix server backups.
52. Provide detailed documentation of health check procedures and or daily maintenance procedures for each of the Unix servers.
53. Provide list of all vendors or clients that have access to Unix servers, their login information and contact information.
54. Provide list of all support vendors for each of these Unix servers and applications running on them.

55. Provide list of any and all procedures and processes we might have to run on all Unix servers to keep them up and running.
56. Provide the Unix Servers disaster recovery plan.
57. Provide a list of all the major risks on each of our current Unix servers.
58. Provide a list of any service accounts or any accounts that cannot be altered or disabled.

**Desktop Group:**

59. Provide detailed inventory of all desktops, laptops, printers, scanners, monitors, end-user peripherals and Panes with serial numbers, make, model, serial numbers and other relevant data, regardless of such devices are actually utilized.
60. Provide detailed documentation about desktop standard configuration.
61. Provide detailed documentation of desktop patching.
62. Provide a list of the master logins and passwords for all desktops.
63. Outline the desktop asset deployment procedures.
64. Outline the desktop asset decommissioning process.
65. Provide the desktop build document.
66. Provide the desktop standard document.
67. Provide a list of the current desktop engineers and their location assignments.
68. Provide all application installation documents for the production applications that outline how to install such applications on a desktop.
69. Provide a list of any service accounts or any accounts that cannot be altered or disabled.

**Application Group:**

70. Provide detailed inventory of all applications, servers they run on, interfaces they use inbound and outbound, database each of the application depends on, application vendor contact information, any information necessary to get support from vendor (i.e., account numbers or support policy numbers for such applications).
71. Provide detailed documentation of the master login and password for each of the applications.
72. Provide detailed documentation of the master SA login or an equivalent login for all the SQL, oracle and or other flavors of databases each of these applications run on.
73. Provide detailed documentation of daily, weekly and or monthly maintenance that needs to be done on each of these applications.
74. Provide detailed documentation of all support vendors' contact information, any account numbers SVCMC should know to gain support for each of these applications.
75. Provide a list of all home grown applications and their sponsor at SVCMC, a contact information (if possible) and what role these home grown application play.
76. Turn over home grown application, provide instructions on how to install, maintain and manage, and access them.
77. Provide master passwords and logins for all the home grown applications and or databases.

78. Provide a list of all application accounts or service accounts that cannot be disabled or altered for each of these applications.
79. Provide documentation of the RAS.

**DBA Group:**

80. Provide a list of all production and home grown database supported by Siemens, and the servers on which they run and applications that they support.
81. Provide a list of the master logins for all these databases. If there are no SA or administrative passwords for these databases, then provide a list of the accounts used by the DBA's to gain administrative access to these databases and passwords associated with those accounts.
82. Provide a list of any accounts that cannot be disabled or altered because the databases depend on them.
83. Provide detailed documentation of health checks performed on these databases and the frequency of these health checks.
84. Provide a final report of any critical issues in regards to any of these databases and any processes or procedures that SVCMC must follow to maintain these databases.
85. Provide a list of any and all contacts of vendors and or support personnel that were used for these databases.
86. Provide detailed documentation of all home grown databases, their roles, what servers they run on, how to access them, how to manage them, how to maintain them, who is the SVCMC business unit or person responsible for each of these home grown databases, whether they are still being used and who uses them.
87. Grant administrative access to Kane Edupuganti's account with respect to all the databases (whether or not such databases are homegrown).

**Backup Group:**

88. Provide detailed documentation of Brightstor and Commvault and Vramer backup infrastructure.
89. Provide the rotation schedules and schemes.
90. Provide contact information for SVCMC's offsite vendor and account details and any other information necessary to send or recall tapes from SVCMC's offsite vendor.
91. Provide the document that outlines the process to send tapes offsite and recall tapes onsite.
92. Provide procedural document that defines how to remove tapes from the library to send offsite, how to load tapes, how to inventory tapes, and a full blown documentation of the library configuration.
93. Provide documentation for the Neo/Reo VTL and tape library.
94. Provide documentation of the BrightStor configuration, license keys, support information, backup and restore job details, timings, and how to back up and restore a document.
95. Provide documentation of the CommVault configuration, license keys, media agents, support information, backup and restore job details, timings, and how to back up and restore a document.



96. Provide documentation of Vranger configuration, license keys, support information, backup and restore job details, timings, and how to back up and restore a document.

**Miscellaneous:**

97. Provide a detailed inventory of all assets in stock that were never deployed.

## **EXHIBIT B**

## SERVICE LIST

Claim Name	Address Information
AKIN GUMP STRAUSS HAUER & FELD LLP	ONE BRYANT PARK ATTN: DAVID H. BOTTER & KENNETH DAVIS (COUNSEL FOR OFFICIAL COMMITTEE OF UNSECURED CREDITORS) NEW YORK NY 10036
AKIN GUMP STRAUSS HAUER & FELD LLP	ROBERT S. STRAUSS BUILDING 1333 NEW HAMPSHIRE AVENUE, N.W. ATTN: ASHLEIGH BLAYLOCK, ESQ. (PROPOSED COUNSEL FOR OFFICIAL COMMITTEE OF UNSECURED CREDITORS) WASHINGTON DC 20036-1564
AKIN GUMP STRAUSS HAUER & FELD LLP	1700 PACIFIC AVENUE, SUITE 4100 ATTN: SARAH SCHULTZ, ESQ. (PROPOSED COUNSEL FOR OFFICIAL COMMITTEE OF UNSECURED CREDITORS) DALLAS TX 75201-4675
ANDREW M. CUOMO	ATTORNEY GENERAL FOR THE STATE OF NEW YORK 120 BROADWAY, 24TH FLOOR NEW YORK NY 10271
APTIUM ONCOLOGY	8201 BEVERLY BOULEVARD ATTN: PETER J. ROGERS CFO AND EXECUTIVE VICE PRESIDENT LOS ANGELES CA 90048-4505
ASSISTANT UNITED STATES ATTORNEY	SOUTHERN DISTRICT OF NEW YORK ONE ST. ANDREW'S PLAZA CLAIMS UNIT - ROOM 417 NEW YORK NY 10007
ATTORNEY GENERAL OF THE STATE OF NEW YORK	ATTN: NEAL S. MANN, ASSISTANT ATTORNEY GENERAL (ON BEHALF OF THE DEPARTMENT OF HEALTH) 120 BROADWAY - 24TH FLOOR NEW YORK NY 10271
BAYARD	COUNSEL TO MED-MAL TRUSTEE, CHRISTIANA BANK 222 DELAWARE AVENUE, SUITE 900 ATTN: NEIL B. GLASSMAN, ESQ. ASHLEY B. STITZER, ESQ. WILMINGTON DE 19801
CHAPPELL & ASSOCIATES, LLC	PRIVACY OMBUDSMAN ATTN: ALAN CHAPPELL 297 DRIGGS AVENUE, SUITE 3A BROOKLYN NY 11222
CITY OF NEW YORK	DEPT OF HEALTH & MENTAL HYGIENE 125 WORTH STREET ATTN: WILLIAM MARTIN, ESQ. NEW YORK NY 10013
COLE, SCHOTZ, MEISEL, FORMAN & LEONARD, P.A.	ATTN: MICHAEL D. SIROTA & NEIL Y. SIEGEL (COUNSEL TO RUDIN DEVELOPMENT LLC) 25 MAIN STREET P.O. BOX 800 HACKENSACK NJ 07601
COLE, SCHOTZ, MEISEL, FORMAN & LEONARD, P.A.	ATTN: MICHAEL D. SIROTA & NEIL Y. SIEGEL (COUNSEL FOR RUDIN DEVELOPMENT, LLC) 900 THIRD AVE., - 16TH FLOOR NEW YORK NY 10022
COOLEY GODWARD KRONISH LLP	COUNSEL TO MEDMAL TRUST MONITOR, M. KATZENSTEIN (OFFICIAL COMMITTEE OF UNSECURED CREDITORS) 1114 AVENUE OF THE AMERICAS ATTN: RICHARD S. KANOWITZ, ESQ. & SETH VAN AALTEN NEW YORK NY 10036
CORPORATE TRUST ADMINISTRATION	CHRISTIANA BANK & TRUST COMPANY 300 DELAWARE AVENUE, SUITE 714 ATTN: RAYE D. GOLDSBOROUGH, ASST. VICE PRESIDENT WILMINGTON DE 19801
EPSTEIN BECKER & GREEN, P.C.	ATTN: PHILIP M. GASSEL, STEVEN E. FOX AND WENDY G. MARCARI, ESQ. 250 PARK AVENUE, 11TH FLOOR (ON BEHALF OF APTIUM W. NEW YORK, INC.) NEW YORK NY 10017
GARFUNKEL WILD, P.C.	111 GREAT NECK ROAD SUITE 503 ATTN: ROBERT A. WILD, ESQ., BURTON WESTON, ESQ. GREAT NECK NY 11021
GOLDFARB & FLEECE	ATTN: NEAL A. WEINSTEIN (COUNSEL TO RUDIN DEVELOPMENT, LLC) 345 PARK AVENUE NEW YORK NY 10154
GRANT THORNTON	666 THIRD AVENUE, 13TH FLOOR ATTN: MARTI KOPACZ NEW YORK NY 10017
INTERNAL REVENUE SERVICE	SPECIAL PROCEDURES BRANCH ATTN: DISTRICT DIRECTOR 290 BROADWAY NEW YORK NY 10007
INTERNAL REVENUE SERVICE	CENTRALIZED INSOLVENCY OPERATION 11601 ROOSEVELT BLVD MAIL DROP N781 PHILADELPHIA PA 10154
INTERNAL REVENUE SERVICE	CENTRALIZED INSOLVENCY OPERATION PO BOX 21126 PHILADELPHIA PA 19114-0326
JEFFREY M. POHL, ESQ.	GENERAL COUNSEL DORMITORY AUTHORITY STATE OF NEW YORK 515 BROADWAY ALBANY NY 12207-2964
KRAMER LEVIN NAFTALIS & FRANKEL LLP	1177 AVENUE OF THE AMERICAS ATTN: KENNETH H ECKSTEIN, ESQ, ADAM C ROGOFF, ESQ P. BRADLEY O'NEILL, ESQ., GREGORY G. PLOTKO, ESQ. NEW YORK NY 10036
LAW OFFICE OF AVRUM J. ROSEN, PLLC	ATTN: AVRUM J. ROSEN (COUNEL TO NEW YORK STATE NURSE'S ASSOCIATION) 38 NEW STREET HUNTINGTON NY 11743
LEVY RATNER, P.C.	(ON BEHALF OF 1199 SEIU BENEFIT FUND) ATTN: RYAN J. BARBUR, SUZANNE HEPNER ATTN: NICOLE D. GRUNFELD 80 EIGHTH AVENUE, 8TH FLOOR NEW YORK NY 10011
LOCAL 803 HEALTH & WELFARE FUND	75 MAIDEN LANE NEW YORK NY 10038-4631
NEW YORK CITY LAW DEPARTMENT	100 CHURCH STREET ATTN: GABRIELA P. CACUCI, ASSISTANT CORP COUNSEL ATTORNEYS FOR THE CITY OF NEW YORK AND AGENCIES NEW YORK NY 10007

## SERVICE LIST

Claim Name	Address Information
NEW YORK STATE DEPARTMENT OF HEALTH	ATTN: TOM JUNG 433 RIVER STREET, 6TH FLOOR TROY NY 12180
NEW YORK STATE DEPARTMENT OF HEALTH	OFFICE OF THE COMMISSIONER CORNING TOWER EMPIRE STATE PLAZA ROOM 2450, ATTN: JOSEPH BIERMAN ALBANY NY 12237
NEW YORK STATE DEPT. OF TAXATION & FINANCE	TAX COMPLIANCE DIVISION 55 HANSON PLACE ATTN: P. WILLIAMSON BROOKLYN NY 11217
NEW YORK STATE NURSES ASSOCIATION	ATTN: THOMAS JENNINGS (OFFICIAL COMMITTEE OF UNSECURED CREDITORS) 120 WALL ST. NEW YORK NY 10005
NYS DEPT. OF TAXATION & FINANCE	BANKRUPTCY/SPECIAL PROCEDURES SECTION P.O. BOX 5300 ALBANY NY 12205-0300
NYS UNEMPLOYMENT INSURANCE FUND	P.O. BOX 551 ALBANY NY 12201
NYSNA BENEFITS	1 PINE WEST BUILDING ALBANY NY 12205
OFFICE OF THE MEDICAID INSPECTOR GENERAL	800 NORTH PEARL STREET ATTN: JAMES G. SHEEHAN ALBANY NY 12204
OFFICE OF THE UNITED STATES ATTORNEY GENERAL	U.S. DEPARTMENT OF JUSTICE 950 PENNSYLVANIA AVENUE, NW ATTN: ERIC H. HOLDER, JR, ATTORNEY GENERAL WASHINGTON DC 20530-0001
OFFICE OF THE UNITED STATES TRUSTEE	FOR THE SOUTHERN DISTRICT OF NEW YORK 33 WHITEHALL STREET, 21ST FLOOR ATTN: SUSAN GOLDEN, ESQ. ATTN: SERENE NAKANO, ESQ. NEW YORK NY 10004
PENSION BENEFIT GUARANTY CORPORATION	ATTN: BRAD ROGERS, ESQ. & SUZANNE KELLY (OFFICIAL COMMITTEE OF UNSECURED CREDITORS) OFFICE OF THE GENERAL COUNSEL 1200 K STREET, N.W. SUITE 340 WASHINGTON DC 20005-4026
SAINT VINCENTS CATHOLIC MEDICAL CENTERS	OF NEW YORK ET AL 170 W. 12TH STREET, SMITH 5 ATTN: JENNIFER COFFEY, ESQ. DEPUTY GENERAL COUNSEL NEW YORK NY 10011
SIDLEY AUSTIN LLP	787 SEVENTH AVENUE ATTN: LEE S. ATTANASIO, ESQ. NEW YORK NY 10019
SPECIAL & SUPERIOR OFFICERS BENEVOLENT ASSOCIATION	200B WEST MAIN ST BABYLON NY 11702
STATE OF NEW YORK DEPARTMENT OF LABOR	UNEMPLOYMENT INSURANCE DIVISION GOVERNOR W. AVERELL OFFICE BUILDING CAMPUS BUILDING 12, ROOM 256 ALBANY NY 12240
U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES	ATTN: JOEL LERNER JACOB JAVITS FEDERAL BUILDING 26 FEDERAL PLAZA - SUITE 3312 NEW YORK NY 10278
WEISS & ZARETT, P.C.	(COUNSEL TO COMMITTEE OF INTERNS & RESIDENTS) ATTN: MICHAEL D. BROFMAN, ESQ. 3333 NEW HYDE PARK ROAD, SUITE 211 SUITE 211 NEW HYDE PARK NY 11042
WINSTON & STRAWN LLP	COUNSEL TO GENERAL ELECTRIC CAPITAL CORPORATION, AS AGENT 200 PARK AVENUE ATTN: DAVID NEIER, ESQ. NEW YORK NY 10166-4193
WINSTON & STRAWN LLP	COUNSEL TO GENERAL ELECTRIC CAPITAL CORPORATION, AS AGENT 101 CALIFORNIA STREET ATTN: RANDY ROGERS, ESQ. SAN FRANCISCO CA 94111-5802

<b>Total Creditor count 46</b>
--------------------------------

## **EXHIBIT C**

## SERVICE LIST

Claim Name	Address Information
BORAH, GOLDSTEIN, ALTSCHULER, NAHINS & GOIDEL,	P.C. ATTN: JEFFREY C. CHANCAS, ESQ. (COUNSEL TO DADOURIAN EXPORT CORP.) 377 BROADWAY NEW YORK NY 10013
EMPIRE BLUE CROSS BLUE SHIELD	ATTN: LOUIS BENZA, ESQ. ASSOCIATE GENERAL COUNSEL (ON BEHALF OF EMPIRE HEALTHCHOICE ASSURANCE, INC) 15 METRO TECH CENTER 4TH FLOOR BROOKLYN NY 11201
FARRELL FRITZ, P.C.	1320 RXR PLAZA ATTN: PATRICK COLLINS (COUNSEL TO MED WORLD ACQUIS. CORP & SHORE PHARMACEUTICAL PROVIDERS, INC.) UNIONDALE NY 11556-1320
FRENKEL, LAMBERT, WEISS, WEISMAN & GORDON, LLP	ATTN. LINDA P. MANFREDI, ESQ. (COUNSEL TO NOUVEAU ELEVATOR INDUSTRIES, INC.) 20 WEST MAIN STREET BAY SHORE NY 11706
LEVER & STOLZENBERG, LLP	ATTN: JAMES M. MARINO (ON BEHALF OF MARGARET GERNON) 303 OLD TARRYTOWN ROAD WHITE PLAINS NY 10603
MICHAEL G. MC AULIFFE, ESQ.	(COUNSEL TO HOSPITAL FINANCE SERVICES CORP. 48 SOUTH SERVICE ROAD, SUITE 102 MELVILLE NY 11747
MORRISON COHEN LLP	ATTN: MICHAEL R. DAL LAGO, ESQ. (ON BEHALF OF EMPIRE HEALTHCHOICE ASSURANCE, INC.) 909 THIRD AVENUE NEW YORK NY 10022
POLLACK & SHARAN, LLP	ATTN: ADAM PAUL POLLACK (ATTORNEYS FOR 13-15 SHERIDAN SQUARE LLC) 15 MAIDEN LANE, SUITE 1400 NEW YORK NY 10038
RAY QUINNEY & NEBEKER P.C.	ATTN: MICHAEL W. SPENCE & RICHARD H. MADSEN P.C. 36 SOUTH STATE STREET, SUITE 1400 P.O. BOX 45385 SALT LAKE CITY UT 84145-0385
SILBERSTEIN, AWAD & MIKLOS, P.C.	ATTN: PAUL N. NADLER, ESQ. 600 OLD COUNTRY ROAD, SUITE 412 COUNSEL TO FILIPPI, STEWART, MCCORD, INFANTINO, WARNER, SMITH & HICKMAN, WHITE GARDEN CITY NY 11530
THE JACOB D. FUCHSBERG LAW FIRM, LLP	(ATTORNEYS FOR JANETH PINTO) ATTN: BRADLEY S. ZIMMERMAN, ESQ. 500 FIFTH AVENUE, 45TH FLOOR NEW YORK NY 10110

<b>Total Creditor count 11</b>
--------------------------------

## **EXHIBIT D**

## **Email Addresses**

achouprouta@kramerlevin.com

ajrlaw@aol.com

alan@chapellassociates.com

arogoff@kramerlevin.com

askdoj@usdoj.gov

astitzer@bayardlaw.com

ayerramalli@kramerlevin.com

blaylocka@akingump.com

boneill@kramerlevin.com

bweston@garfunkelwild.com

dblabey@kramerlevin.com

dbotter@akingump.com

dneier@winston.com

dtatge@ebglaw.com

gcacuci@law.nyc.gov

gplotko@kramerlevin.com

jbarbiere@coleschotz.com

jcoffey@svcmcnyc.org

jkim@coleschotz.com

jshifer@kramerlevin.com

kdavis@akingump.com

keckstein@kramerlevin.com

kelly.suzanne@pbgc.gov

lattanasio@sidley.com

lleyva@coleschotz.com

marti.kopacz@gt.com

mbrofman@weisszarett.com

msirota@coleschotz.com

neal.mann@oag.state.ny.us

nglassman@bayardlaw.com

ngrunfeld@levyratner.com

nsiegel@coleschotz.com

nweinstein@gflegal.com

pgassel@ebglaw.com

progers@aptiumoncology.com

rbarbur@levyratner.com

rgoldsborough@christianatrust.com

rkanowitz@cooley.com

rrogers@winston.com

rwild@garfunkelwild.com

sfox@ebglaw.com

shepner@levyratner.com

sschultz@akingump.com

svanaalten@cooley.com

svcmc2010@epiqsystems.com

thomas.jennings@nysna.org

timothy.wells@1199funds.org

wmarcari@ebglaw.com



## **EXHIBIT E**

## **Email Addresses**

adrienne.sturges@sodexo.com

ahalperin@halperinlaw.net

alex@iyseniorcare.com

atisi@rmfwlaw.com

bankruptcy@goodwin.com

bonica@kurlandassociates.com

bstrickland@wtplaw.com

cspringer@reedsmith.com

david.boyle@airgas.com

david.tillem@wilsonelser.com

dclark@stinson.com

dcohen@halperinlaw.net

dcrapo@gibbonslaw.com

dladdin@agg.com

dlee@nixonpeabody.com

eestrada@reedsmith.com

emcgovern@reedsmith.com

epugliese@cullenanddykman.com

ffm@bostonbusinesslaw.com

fhoensch@schnader.com

fred@seemanlaw.com

gcacuci@law.nyc.gov

gregory.milmoe@skadden.com

igoldstein@dl.com

ihernandez@manatt.com

ikallick@manatt.com

jbarbiere@coleschotz.com

jdt@jdtthompsonlaw.com

jeanne.irwin@sunlife.com

jgarfinkle@buchalter.com

jhellman@silvermanacampora.com

jkim@coleschotz.com

john.j.schwab@siemens.com

jonathan.alter@bingham.com

jrutsky@triefandolk.com

jwatson@coxsmith.com

kdwbankruptcydepartment@kelleydrye.com

khroblak@wtplaw.com

kmiller@skfdelaware.com

kurland@kurlandassociates.com

lana@iyseniorcare.com

lleyva@coleschotz.com

mberman@nixonpeabody.com

mbrofman@weisszarett.com

mdavis@zeklaw.com

menerl@coned.com

mfishman@npmlaw.com

moses.schlesinger@gmail.com

mpovman@povman.com

mtamasco@schnader.com

## **Email Addresses**

mtulis@oxmanlaw.com

nola.bencze@bipc.com

pbrodnicki@dl.com

peter@seemanlaw.com

pivanick@dl.com

polberg@manatt.com

ray.carlisi@mckesson.com

rbernstein@mcinnis-law.com

rrich2@hunton.com

sbernstein@hunton.com

schristianson@buchalter.com

sean.kulka@agg.com

shana.elberg@skadden.com

steven.vaccarello@bnymellon.com

tjeffries@dl.com

tnixon@gklaw.com

v.kozhich@hohlaw.com

w.holm@hohlaw.com

wheuer@duanemorris.com

wschrag@duanemorris.com

## **EXHIBIT F**

[dbaker@reedsmith.com](mailto:dbaker@reedsmith.com)  
[cspringer@reedsmith.com](mailto:cspringer@reedsmith.com)

## **EXHIBIT G**

**SV2 DI 888 9-17-10**

Sodexho Clinical Technology Management  
Aka Patriot Medical Technology of Ohio  
7100 Commerce Way, Suite 280  
Brentwood, TN 37027

**SV2 DI 888 9-17-10**

Sodexho Legal  
9801 Washington Blvd. 12<sup>th</sup> Floor  
Gaithersburg, MD 20878

**SV2 DI 888 9-17-10**

JD Thompson Law  
Attn: Judy D. Thompson  
PO Box 33127  
Charlotte, NC 28233

**SV2 DI 888 9-17-10**

AGA Gas, Inc.  
60555 Rockside Woods Blvd.  
PO Box 94737  
Cleveland, OH 44101-4737

**SV2 DI 888 9-17-10**

New York Dialysis Services, Inc.  
207 East 94<sup>th</sup> Street  
New York, NY 10128

**SV2 DI 888 9-17-10**

Fresenius Medical Care North America  
95 Hayden Avenue  
Lexington, MA 02420-9192  
New York Dialysis Services Inc.  
207 East 94<sup>th</sup> Street  
New York, NY 10128

**SV2 DI 888 9-17-10**

Proskauer Rose, LLP  
Attn: Edward S. Kornreich, Esq.  
1585 Broadway  
New York, NY 10036

**SV2 DI 888 9-17-10**

Care Fusion 2200, Inc.  
c/o Meredith Edelman  
Skadden, Arps, Slate, Meagher & Flom LLP  
300 South Grand Avenue  
Los Angeles, CA 90071

**SV2 DI 888 9-17-10**

Respiratory Contract Administrator  
1430 Waukegan Road  
McGraw Park, IL 60085

## **EXHIBIT H**



**SV2 DI 891 9-17-10**

Pension Benefit Guaranty Corporation  
Attn: Israel Goldowitz, Charles L. Finke,  
Joel W. Ruderman, and Kelly R. Cusick  
Office of the Chief Counsel  
1200 K Street, N.W.  
Washington, D.C. 20005

## **EXHIBIT I**

SV2 Letter Re Siemens 9-17-10

Reed Smith LLP  
2600 One Liberty Place  
1650 Market Street  
Philadelphia, PA 19103-7301  
Attn: Derek J. Baker & Claudia Z. Springer

SV2 Letter Re Siemens 9-17-10

The Honorable Cecelia G. Morris  
United States Bankruptcy Court  
Southern District of New York  
355 Main Street  
Poughkeepsie, NY 12601