

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

In re:

GULF COAST HEALTH CARE, LLC, *et al.*,

Debtors.

Chapter 11

Case No. 21-11336 (KBO)

Jointly Administered

BELFOR USA GROUP, INC.,

Plaintiff,

V.

Adversary No. 22-50355 (KBO)

GULF COAST HEALTH CARE, LLC,  
NF GLEN COVE, LLC d/b/a GLENCOVE  
HEALTH AND REHABILITATION CENTER,

Defendants.

**STIPULATION PURSUANT TO LOCAL RULE 7012-2 EXTENDING  
DEFENDANTS' TIME TO RESPOND TO AMENDED COMPLAINT**

The above-captioned plaintiff (“**Plaintiff**”) and each of the above-captioned defendants (collectively, the “**Defendants**” and, together with the Plaintiff, the “**Parties**”), by and through their undersigned counsel, pursuant to Rule 7012-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court of the District of Delaware (the “**Local Rules**”), hereby stipulate as follows:

1. On May 23, 2022, the Plaintiff filed its *Complaint for Imposition of Constructive Trust and for an Accounting* [Adv. Docket No. 1] (the “**Complaint**”) against the Defendants.
2. On May 24, 2022, the Plaintiff filed an amended version of the Complaint [Adv. Docket No. 2] (the “**Amended Complaint**”).

3. The time for the Defendants to respond to the Amended Complaint currently expires no earlier than June 23, 2022.

4. Pursuant to Local Rule 7012-2, “[t]he deadline to plead or move in response to a complaint or other pleading in an adversary proceeding may be extended for a period of up to twenty-eight (28) days by stipulation of the parties docketed with the Court[.]” Del. Bankr. L.R. 7012-2.

**IT IS HEREBY STIPULATED AND AGREED** by the Parties that:

1. The time within which the Defendants may file an answer, move, or otherwise respond to the Amended Complaint is hereby extended through and including July 21, 2022.

2. This Stipulation is without prejudice to the Plaintiff’s or Defendants’ substantive rights.

*[Remainder of Page Intentionally Left Blank]*

**IT IS SO STIPULATED:**

Dated: June 17, 2022

**COZEN O'CONNOR LLP**

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