

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:	§	
	§	
PIPELINE HEALTH SYSTEMS, LLC, <i>et al.</i>, ¹	§	CASE NO. 22-90291(MI)
	§	(Chapter 11)
DEBTORS.	§	(Jointly Administered)
	§	

**NOTICE OF SUSAN N. GOODMAN'S FIFTH MONTHLY FEE STATEMENT
FOR COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF
EXPENSES AS PATIENT CARE OMBUDSMAN FOR THE PERIOD FROM
FEBRUARY 1, 2023, THROUGH FEBRUARY 17, 2023**

Name of Applicant:	Susan N. Goodman	
Applicant's Role in Case:	Patient Care Ombudsman	
Date Order of Employment Signed:	10/12/2022 [Docket No. 156]	
	Beginning of Period	End of Period
Time period covered by this Application:	02/01/2023	02/17/2023
Time period(s) covered by prior monthly Applications:	10/12/2022	10/31/2022 – 1 st Mo
	11/1/2022	11/30/2022 - 2 nd Mo
	12/1/2022	12/31/2022 – 3 rd Mo
	1/1/2023	1/31/2023 – 4 th Mo
Total amounts awarded in all prior Statements/Applications: (1 – 3 rd paid)	\$66,458.28	
Total fees requested in this Statement (all professional fees):	\$3,160.00	
Reimbursable expenses sought in this application:	\$0.00	
Total fees and expenses:	\$3,160.00	
Total fees and expenses requested in this statement (with 20% holdback):	\$2,528.00	
Total actual professional hours covered by this Application:	8.0	
Average hourly rate for professionals:	\$395.00	

¹ A complete list of each of the Debtors in these chapter 11 cases and the last four digits of their federal tax identification numbers may be obtained on the website of the Debtors' claims and noticing agent at <http://dm.epiq11.com/Pipeline Health>. The Debtors' service address is 898 N. Pacific Coast Highway, Suite 700, El Segundo, CA 90245.

IN ACCORDANCE WITH THE *ORDER (I) ESTABLISHING PROCEDURES FOR INTERIM COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR RETAINED PROFESSIONALS AND (II) GRANTING RELATED RELIEF* [DOCKET NO. 494], EACH PARTY RECEIVING NOTICE OF THIS MONTHLY FEE STATEMENT WILL HAVE UNTIL 4:00 PM CST, 14 DAYS AFTER SERVICE OF THE MONTHLY FEE STATEMENT TO OBJECT TO THE REQUESTED FEES AND EXPENSES. UPON THE EXPIRATION OF THE 14-DAY PERIOD, THE DEBTORS ARE AUTHORIZED TO PAY THE PROFESSIONAL AN AMOUNT OF 80% OF THE FEES AND 100% OF THE EXPENSES REQUESTED IN THE APPLICABLE MONTHLY FEE STATEMENT.

Susan N. Goodman, the Patient Care Ombudsman (“PCO” or “Applicant”), pursuant to sections 333, 327, 330, and 331 of title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 2016 of the Fed. R. Bankr. P. (the “**Bankruptcy Rules**”), Rule 2016-1 of the Bankruptcy Local Rules for the Southern District of Texas (the “**Local Bankruptcy Rules**”); the *Notice of Appointment of Patient Care Ombudsman Pursuant to 11 U.S.C. § 333* [Docket No. 156]; and the court’s November 16, 2022, *Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals And (II) Granting Related Relief* [Docket No. 494] (the “**Interim Compensation Order**”) hereby submits this FIFTH monthly fee statement (the “**Statement**”).

Pursuant to the Interim Compensation Order, the Statement seeks payment of (a) compensation in the amount of \$3,160.00, and (b) reimbursement of \$0.00 in actual and necessary expenses (the “**Statement Award**”) accrued between February 1, 2023, through and including February 17, 2023 (the “**Statement Period**”).

A total of 2.5 hours of Applicant’s requested compensation is properly categorized under General Case Administration. A total of 5.5 hours was spent on fee-related activities and 0.0 hours were spent on half-rate, non-working travel. No expenses were incurred by the PCO during the Statement Period.

In support of the Statement, PCO submits Exhibits showing the total amount of the accrued professional fees and expenses along with a detailed invoice for these total amounts. These Exhibits follow the certificate of service as Exhibits B and C.

Pursuant to the Interim Compensation Order, any party objecting to the payment of the Statement Award shall, within fourteen (14) days of service of the Statement, on or before 4:00 p.m. (prevailing Central Standard Time), serve via email to the Applicant and the following statement recipients (as defined in the Interim Compensation Order), a written notice setting forth the precise nature of the objection and the amount at issue (the “Notice of Objection”)to:

Pipeline Health System, LLC Attn: Bob Allen 898 N. Pacific Coast Highway, Ste 700 El Segundo, CA 90245 rallen@pipelinehealth.us <i>The Debtors</i>	Kirkland & Ellis LLP Jaimie Fedell 300 N. LaSalle Chicago, IL 60654 jaimie.fedell@kirkland.com <i>Attorneys for the Debtors</i>
Kirkland & Ellis LLP Steven Serajeddini Zach Manning 601 Lexington Ave New York, NY 10022 steven.serajeddini@kirkland.com zach.manning@kirkland.com <i>Attorneys for Debtors</i>	Jackson Walker LLP Kristhy M Peguero Veronica Ann Polnick Matthew Cavanaugh 1401 McKinney Street, Ste 1900 kpeguero@jw.com vpolnick@jw.com mcavanaugh@jw.com <i>Local counsel for Debtors</i>
Paul Hastings LLP Jayme Goldstein Sayan Bhattacharyya Isaac Sasson 200 Park Ave. New York, NY 10166 jaymegoldstein@paulhastings.com sayanbhattacharyya@paulhastings.com isaacsasson@paulhastings.com <i>Attorneys for DIP Lenders and Prepetition Term Loan Lenders</i>	Haynes and Boone, LLP Charles A Beckham, Jr Kelli S. Norfleet 1221 McKinney St, Ste 4000 Houston, TX 77010 charles.beckham@haynesboone.com kelli.norfleet@haynesboone.com <i>Co-Attorneys for DIP Lenders and Prepetition Term Loan Lenders</i>
Sullivan & Cromwell LLP James Bromley Benjamin Beller Ari Blaut 125 Broad Street New York, NY 10004 bromleyj@sullcom.com bellerb@sullcom.com blauta@sullcom.com <i>Attorneys for DIP Lenders and Prepetition Term Loan Lenders</i>	Waller Lansden Dortch and Davis LLP Tyler N. Layne David E. Lemke 511 Union Street, Ste 2700 Nashville, TN 37219 tyler.layne@wallerlaw.com david.lemke@wallerlaw.com <i>Attorneys for Credit Suisse AG, New York</i>
Office of the United States Trustee Jayson Ruff Ha Minh Nguyen Christopher Ross Travis 515 Rusk Street, Ste 3516 Houston, TX 77002 jayson.b.ruff@usdoj.gov ha.nguyen@usdoj.gov c.ross.travis@usdoj.gov <i>Attorneys for Office of the U.S. Trustee</i>	Akin Gump Strauss Hauer & Feld LLP 2300 N. Field St, Ste 1800 Dallas, TX 75201 Sarah Link Schultz sschultz@akingump.com <i>Attorneys for Official Committee of Unsecured Creditors</i>

Akin Gump Strauss Hauer & Feld LLP David Botter One Bryant Park New York, NY 10036 dbotter@akingump.com <i>Attorneys for Official Committee of Unsecured Creditors</i>	Any party that has requested notice pursuant to Bankruptcy Rule 2002.
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Although Applicant has made every effort to include all fees and expenses incurred in the Statement Period, some fees and/or expenses might not be included in this Statement due to delays caused by accounting and processing for the Statement Period. As such, Applicant reserves the right to make further application to this court for allowance of such fees and/or expenses not included herein through her forthcoming first and final fee application which will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Interim Compensation Order.

DATED: February 27, 2023.

By: /s/Susan N. Goodman, RN JD

Texas Bar No. 24117585
PIVOT HEALTH LAW, LLC
P.O. Box 69734 | Oro Valley, AZ 85737
Message: 520.744.7061
sgoodman@pivotohealthaz.com
Patient Care Ombudsman

STATEMENT OF CERTIFYING PROFESSIONAL

The undersigned hereby certifies that I have prepared and read the foregoing *Notice of Susan Goodman's Fifth Monthly Fee Statement for Compensation for Services Rendered and Reimbursement of Expenses as Patient Care Ombudsman for the Period from February 1, 2023 through February 17, 2022*, and to the best of my knowledge, information and belief, formed after reasonable inquiry, the compensation and expense reimbursement requested (a) are in conformity with the Court's *Guidelines for Compensation and Reimbursement of Professionals in Chapter 11 Cases*, effective January 1, 2001, and (b) were billed at rates in accordance with practices, no less favorable than those customarily employed by the Applicant, and generally accepted by the Applicant's clients.

DATED: February 27, 2023.

By: /s/Susan N. Goodman, RN JD

Texas Bar No. 24117585
PIVOT HEALTH LAW, LLC
P.O. Box 69734 | Oro Valley, AZ 85737
Message: 520.744.7061
sgoodman@pivotohealthaz.com
Patient Care Ombudsman

EXHIBIT A

CERTIFICATE OF SERVICE

I certify that on February 27, 2023, I filed a copy of the foregoing document via the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas. Copies of the foregoing document served electronically via the court's CM/ECF notification system this 27th day of February 2023 on all parties that have appeared in this case.

By: /s/ Susan N. Goodman, RN JD



EXHIBIT B
Fee Statement Summary

Case Name: Pipeline Health System, LLC
Case No: 22-90291-JA-MI
02/01/2023 - 02/17/2023

Cumulative Totals to Date				
FEES BILLED	COSTS BILLED	HOLDBACK	FEES PAID	COSTS PAID
\$83,345.00	\$6,481.48	\$16,669.00	\$59,976.80	\$6,481.48

Date:	27-Feb-23	Objection Deadline:	13-Mar-23
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MO/YR	PROFESSIONAL	RATE/HR	HOURS BILLED	TOTAL	HOLDBACK	AMT DUE
Oct-22	SUSAN N. GOODMAN	\$395.00	12.6	\$4,977.00	\$995.40	\$3,981.60
Nov-22	SUSAN N. GOODMAN	\$395.00	125.1	\$49,414.50	\$9,882.90	\$39,531.60
Dec-22	SUSAN N. GOODMAN	\$395.00	52.1	\$20,579.50	\$4,115.90	\$16,463.60
Jan-23	SUSAN N. GOODMAN	\$395.00	13.2	\$5,214.00	\$1,042.80	\$4,171.20
Feb-23	SUSAN N. GOODMAN	\$395.00	8.0	\$3,160.00	\$632.00	\$2,528.00
	TOTAL FEES			\$83,345.00	\$16,669.00	\$66,676.00
	TOTAL COSTS			\$6,481.48	N/A	\$6,481.48
	Costs This Period			\$0.00		
	AMOUNT DUE			\$89,826.48		\$73,157.48

**Pivot Health Law, LLC**

P.O. Box 69734
Oro Valley, AZ 85737

Invoice**Invoice #:** 1266**Invoice Date:** 2/27/2023**Bill To:**

Pipeline Health System, LLC
SD TX HOU - 22-90291-JA-MI
File No. 43424

Period: February 2023

Date	Description	Hours/Qty	Rate	Amount
2/1/2023	EML exchgs corp quality and Coast quality re redirect ShareFile set up; follow up EML White Rock quality (.2); review Coast data with last Pepper data review and follow up EML quality team member (.5)	0.7	395.00	276.50
2/1/2023	Review and analyze White Rock quality data file	0.5	395.00	197.50
2/2/2023	follow up UST and debtor counsel re plan effective date re need to schedule site visit for locations absent closure 2/3/23	0.1	395.00	39.50
2/3/2023	Txt Debtor re delay in effective date and follow up (.2)	0.2	395.00	79.00
2/5/2023	update call DON WhiteRock	0.2	395.00	79.00
2/6/2023	review and analyze east LA quality data (.5); TXT follow up re effective data debtor counsel with follow up PCO counsel; NOA DE 1100 and updates (.1)	0.6	395.00	237.00
2/7/2023	Time to prepare, file, follow-up re 4th mo fee (1.6) and first/final interim fee app and associated pleadings (3.2)	4.8	395.00	1,896.00
2/10/2023	docket monitoring - pro hac update re DE 1111	0.1	395.00	39.50
2/16/2023	Docket monitoring for items related to PCO final fee prep - DE 1129 Pro Hac and updates	0.1	395.00	39.50
2/17/2023	Time to prepare 5th mo fee app in advance of first/final as budgeted	0.7	395.00	276.50

Total	\$3,160.00
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Payments/Credits	\$0.00
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Balance Due	\$3,160.00
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