

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

IN RE:

PIPELINE HEALTH SYSTEMS, LLC, *et al.*,¹

DEBTORS.

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CASE NO. 22-90291(MI)
(Chapter 11)
(Jointly Administered)

**SUMMARY OF FIRST AND FINAL APPLICATION OF
SUSAN N. GOODMAN, PATIENT CARE OMBUDSMAN, FOR
ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES**

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:	10/12/2022	2/17/2023
Time period(s) covered by prior monthly Applications:	10/12/2022	10/31/2022
	11/1/2022	11/30/2022
	12/1/2022	12/31/2022
	1/1/2023	1/31/2023
	2/1/2023	2/17/2023
Total amounts awarded in all prior Applications: (paid for 1 st – 3 rd mos.)	\$66,458.28	
Total fees requested in this Application (all professional fees):	\$83,345.00	
Total actual professional hours covered by this Application:	211.5	
Average hourly rate for professionals:	\$394.07	
Total paraprofessional fees requested in this Application:	\$0.00	
Total actual paraprofessional hours covered by this Application:	0.00	
Average hourly rate for paraprofessionals:	N/A	
Reimbursable expenses sought in this application:	\$6,481.48	
Docket Location of Plan Confirmation Order with Creditor Treatment	Docket No. 1041	
Date of Confirmation Hearing:	01/13/2023	

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](http://dm.epiq11.com/Pipeline%20Health). The Debtors' service address is 898 N. Pacific Coast Highway, Suite 700, El Segundo, CA 90245.

UNITED STATES BANKRUPTCY COURT
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PIPELINE HEALTH SYSTEMS, LLC, <i>et al.</i> ,	§	CASE NO. 22-90291(MI)
	§	(Chapter 11)
DEBTORS.	§	(Jointly Administered)
	§	

FIRST AND FINAL APPLICATION OF SUSAN N. GOODMAN,
PATIENT CARE OMBUDSMAN, FOR ALLOWANCE OF COMPENSATION AND
REIMBURSEMENT OF EXPENSES FOR PERIOD
OCTOBER 12, 2022, THROUGH AND INCLUDING FEBRUARY 17, 2023

THIS APPLICATION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THIS APPLICATION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE APPLICATION SHOULD NOT BE GRANTED.

IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF REQUESTED IN THIS APPLICATION MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE APPLICATION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE APPLICATION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

TO: THE HON. MARVIN ISGUR
UNITED STATES BANKRUPTCY JUDGE

Susan N. Goodman, the Patient Care Ombudsman (“PCO” or “Applicant”), pursuant to sections 333, 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 Order requiring the appointment of a patient care ombudsman entered on the court’s docket at Docket No. 1 on October 2, 2022, 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 first and final fee application (the “**Application**”).

The Application seeks payment of (a) compensation in the amount of \$83,345.00 and (b) reimbursement of \$6,481.48 in actual and necessary expenses accrued between October 12, 2022, through Debtor’s plan effective date in February 2023 (the “**Application Period**”).

The total expenses of \$6,481.48 incurred by the PCO during the Application Period, separated by category type were:

Category	Total Amount
Airfare	\$2,481.88
Car Rental	\$1,391.47
Hotel	\$1,885.69
Meals	\$347.44
Parking Fees/Tolls	\$365.00
Total Expenses	\$6,481.48

The total professional fees, separated by time category were:

General Case Administration (“GCA”)	178.6 hours
½ Rate Non-Working Travel (“NWT”)	22.5 hours
Fee Administration (“FA”)	10.4 hours

PCO also separated her professional time by specific Debtor case numbers. Time that was generally applicable across all Debtor locations was attributed to the lead case number. That data is as follows:

Debtor Name	Case No.	GCA	NWT	FA	Total
Pipeline Health, LLC	22-90291	29.6	0.0	9.9	39.5
West Suburban Med. Ctr.	22-90313	33.9	6.4	0.0	40.3
Weiss Memorial Hospital	22-90306	26.4	5.1	0.0	31.5
Coast Plaza Hospital	22-90308	15.0	1.7	0.1	16.8
East LA Doctor's Hospital	22-90290	16.8	2.0	0.1	18.9
Community Hospital	22-90293	13.5	1.7	0.1	15.3
Memorial Hosp. Gardena	22-90298	16.7	1.1	0.1	17.9
White Rock Med. Ctr.	22-90319	26.7	4.5	0.1	31.3

In support of this Application, PCO represents as follows:

JURISDICTION AND VENUE

1. This Court has jurisdiction of this Chapter 11 proceeding pursuant to 28 U.S.C. §§ 157 and 1334. This matter constitutes a core proceeding pursuant to 28 U.S.C. § 157(b)(2).
2. Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.
3. The statutory predicates for the relief requested in this Application are Local Rule of Bankruptcy Procedure 2016, Federal Rules of Bankruptcy Procedure Rule 2016, and Bankruptcy Code §§ 105, 330 and 333.

BACKGROUND

4. On October 2, 2022 (the “**Petition Date**”), Debtors filed for Chapter 11 bankruptcy protection pursuant to the Bankruptcy Code.
5. No trustee or examiner has been appointed pursuant to Section 1104 of the Bankruptcy Code.
6. Pursuant to this court’s order requiring the appointment of a patient care ombudsman entered on the court’s docket at Docket No. 1 on October 2, 2022, the United States Trustee for the Southern and Western Districts of Texas filed *Notice of Appointment of Patient Care*

Ombudsman Under 11 U.S.C. § 333 on October 12, 2022 at Docket No. 156. These pleadings are both incorporated by reference as though fully contained herein.

SUMMARY OF SERVICES PROVIDED

7. During the Application Period, PCO promptly engaged in initial site visits to Debtor's seven hospital locations, beginning with the Illinois locations. PCO authored reports for each of these locations.

8. In the interim reporting periods, PCO remained engaged with site leadership, departmental team members, case professionals, and the United States Trustee's office. PCO's follow-up included remote review of quality data metrics. Additionally, PCO monitored docket filings, reviewing pleadings at a level consistent with her case role.

9. Consistent with the Interim Compensation Order, PCO submitted a total of five monthly fee statements.

10. In support of this Application, PCO submits fee summaries and detailed invoices (by month) attached herein as Exhibits B and C.

11. PCO spent a total of 211.5 hours engaged in the PCO role. More than 84% of PCO's time was spent in General Case Administration, as previously noted herein.

EVALUATION STANDARDS

12. United States Bankruptcy Code § 330(a)(3)-(4)(A) provides an analytical framework to evaluate the reasonableness of professional fees and expenses. The court considers the nature, extent, and value of the services rendered relative to: (1) the time spent, (2) the rates charged, (3) whether the services were necessary or provided a benefit to the estate, (4) the time spent relative to the complexity and nature of the task addressed, (5) whether the professional demonstrated skill and expertise, (6) whether the professional fee is comparatively reasonable, and (7) whether the fee avoids unnecessary duplication and/or waste. If the professional fee requested fails this analysis, the court may reduce the amount of compensation awarded.

13. The Fifth Circuit has historically adopted a “lodestar” method for determining the reasonableness of compensation under Bankruptcy Code §330. See *In re Lawler*, 807 F.2d 1207, 1211 (5th Cir. 1987) (the primary method used to determine a reasonable fee in bankruptcy is “equal to the number of hours reasonably expended multiplied by the prevailing hourly rate in the community for similar work”).

14. PCO provided a vital and necessary service to patients cared for by the Debtors during the reorganization process through effective and ongoing interaction and engagement that added value through proactive oversight and feedback. PCO worked efficiently in the execution of the PCO role, with total accumulated fees and expenses averaging at less than \$13,000.00 per hospital location. Accordingly, PCO requests that this court enter a final order approving and allowing full payment of PCO’s fees and expenses in the total requested amount of **\$89,826.48** (\$83,345.00 in fees and \$6,481.48 in expenses).

15. The \$395.00 hourly rate charged by PCO compares favorably to hourly rates charged by other professionals in this field and is consistent with PCO’s health law practice fees. PCO has clinical, health care operations, and health law compliance experience that allowed for thorough PCO coverage across seven facilities in three states without engagement of additional operational assessment team members.

16. Due to the size and complexity of this case, PCO moved for the appointment of counsel to allow PCO to focus operationally. The court approved this support in its *Order Granting Application for Entry of an Order Authorizing the Retention and Employment of Crowe & Dunlevy, P.C. as Counsel to the Patient Care Ombudsman* [Docket No. 806, December 16, 2022].

17. PCO has not shared or agreed to share compensation or reimbursement awarded in this case with any other person or entity. No agreement or understanding exists between PCO and any other person for a division of compensation. Applicant has not entered into any agreement prohibited by U.S.C. Title 18 § 155.

RELIEF REQUESTED

WHEREFORE, PCO respectfully requests that this court enter an order substantially in the form attached herein as Exhibit D:

- a. approving, on a final basis, the allowance of \$83,345.00 as reasonable compensation for actual and necessary professional services rendered by the PCO for the benefit of the Debtors' facilities during the Application Period;
- b. approving on a final basis, the reimbursement of actual and necessary out-of-pocket expenses in the amount of \$6,481.48 incurred by the PCO in the performance of required professional services during the Application Period;
- c. authorizing Debtors to pay the PCO any remaining unpaid fees still owing from submitted monthly fee statements (\$6,699.20 at the time of the filing of this Application) and all 20% fee holdback monies in the amount of \$16,669.00;
- d. granting such other and further relief as the court deems just and proper.

DATED: February 28, 2023.

By: /s/ Susan N. Goodman, RN JD
Texas Bar No. 24117585
PIVOT HEALTH LAW, LLC
P.O. Box 69734
Oro Valley, AZ 85737
sgoodman@pivotohealthaz.com
Patient Care Ombudsman

STATEMENT OF CERTIFYING PROFESSIONAL

The undersigned hereby certifies that I have prepared and read the foregoing *First and Final Application of Susan N. Goodman, Patient Care Ombudsman, for Allowance of Compensation and Reimbursement of Expenses for Period October 12, 2022, through and including February 17, 2023* 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 28, 2023.

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

EXHIBIT A
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Application was served upon the parties via the court's electronic transmission facilities on this 28th day of February 2023, with an additional electronic copy sent to all parties making an appearance in this case as provided herein. Further, a copy of this Application was provided to Debtors' noticing agent for service.

/s/ Susan N. Goodman, RN JD

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Hinshaw & Culbertson, LLP Mark A. Carter 151 N. Franklin St, Ste 2500 Chicago, IL 60606 mcarter@hinshawlaw.com <i>Attorneys for Sysmex America Inc.</i>	McElroy Deutsch Mulvaney & Carpenter LLP Gary D. Bressler David P. Primack 300 Delaware Ave., Ste 1014 Wilmington, DE 19801 gbressler@mdmc-law.com dprimack@mdmc-law.com <i>Attorneys for Crum & Forster Specialty Insurance Co.</i>
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Remedy Law Group LLP Armen Zenjiryan 610 E. Providence Ave, Unit B Burbank, CA 91501 armen@remedylawgroup.com <i>Attorneys for Ann-Mattia Schiller</i>	Austria Legal, LLC Matthew P. Austria 1007 N. Orange Street, 4 th Flr Wilmington, DE 19801 maustria@austriallc.com <i>Attorneys for California Rehabilitation Services, Inc.</i>

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Goodwin Procter LLP Kizzy L. Jarashow The NY Times Bldg, 620 Eighth Ave. New York, NY 10018 kjarashow@goodwinlaw.com <i>Attorneys for Accuity Delivery Systems, LLC</i>	Voorn Jaworski & Preston PC Meghan E. Preston 1938 East Lincoln Hwy, Ste 219 New Lenox, IL 60451 mpreston@vjlawyers.com <i>Attorneys for Block Electric Co, Inc.</i>

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Arent Fox Schiff LLP Anne M. Murphy Justin Kesselman 800 Boylston Street, 32 nd Floor Boston, MA 02199 anne.murphy@afslaw.com justin.kesselman@afslaw.com <i>Special Regulatory Counsel to Debtors</i>	Hahn Loeser & Parks LLP Daniel A. DeMarco, Esq. 200 Public Square, Ste 2800 Cleveland, OH 44114 dademarco@hahnlaw.com <i>Attorneys for CBRE, Inc.</i>
Thompson Hine LLP Jonathan S. Hawkins 10050 Innovation Drive, Ste 400 Miamisburg, OH 45342 jonathan.hawkins@thompsonhine.com <i>Attorneys for Medely, Inc.</i>	Matthews Shiels Knott Eden Davis & Beanland LLP Misti L. Beanland 8131 LBJ Freeway, Ste 700 Dallas, TX 75251 beanland@mssattorneys.com <i>Attorneys for Creditor Walters Wholesale Electric Co.</i>
Nelson Mullins Riley & Scarborough LLP Adam D. Herring 201 17 th Street NW, Ste 1700 Atlanta, GA 30363 adam.herring@nelsonmullins.com <i>Attorneys for Change Healthcare LLC</i>	Jack N. Fuerst and Assoc. PC Jack N. Fuerst 2500 Tanglewilde St, Ste 320 Houston, TX 77063 jfuerst@sbcglobal.net <i>Attorneys for Haffner Law PC</i>
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Bailey and Romero Law Martha E. Romero 10820 Beverly Blvd, Ste A5 #280 Whittier, CA 90601 marthaeromerolaw@gmail.com <i>Attorneys for West Coast Boiler, Inc.</i>	

/s/ Susan N. Goodman, RN JD



EXHIBIT B
Fee Statement Summary

Case Name: Pipeline Health System, LLC

Case No: 22-90291-JA-MI

10/12/2022 - 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:	28-Feb-23	Objection Deadline:	23-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
	AMOUNT DUE			\$89,826.48		\$73,157.48

**Pivot Health Law, LLC**

P.O. Box 69734
Oro Valley, AZ 85737

EXHIBIT C - ITEMIZED INVOICES **Invoice**
Invoice #: 1244**Invoice Date:** 11/5/2022**Bill To:**

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

Period: October 12 - 31, 2022

Date	Description	Hours/Qty	Rate	Amount
10/12/2022	Review notice of appointment (.1); follow up call UST re same (.2); research additional resources r/t HIPAA support for record access to UST and pleading samples (.4); prepare pro hac motion (.2); Introductory EML debtors (.1)	1	395.00	395.00
10/12/2022	Initial file opening work - docket review for previous NOAs, build interested party list (Word) and Outlook group, research locations and build location list (3.0 paralegal rate - reduced to 1.6 legal rate)	1.6	395.00	632.00
10/12/2022	Review docket to date for entries with potential patient implications (DE 119, 130, 82, 67, 131, 137)	0.5	395.00	197.50
10/13/2022	Docket monitoring, notice document updates, pleading review, and calendaring at level consistent with PCO role [DEs 164-65] (.2); call with proposed counsel in advance intro call (.2); EML exchanges with debtors to reschedule call (.1)	0.5	395.00	197.50
10/14/2022	Introductory call with Kirkland Debtor counsel x2 (.5); follow up call with proposed PCO counsel (.2)	0.7	395.00	276.50
10/14/2022	Docket monitoring, pleading review, calendar updates, notice source document and EML list updates for DEs 167 through 178	0.2	395.00	79.00
10/17/2022	GCA - docket monitoring and analysis at level consistent with role [NOA DE 184 Sodexo]; Claim #5 - check vendor for patient care connection; EML proposed counsel re Ankura reach out	0.2	395.00	79.00

Total

Payments/Credits

Balance Due

**Pivot Health Law, LLC**

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 Oro Valley, AZ 85737

Invoice**Invoice #:** 1244**Invoice Date:** 11/5/2022**Bill To:**

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

Period: October 12 - 31, 2022

Date	Description	Hours/Qty	Rate	Amount
10/17/2022	docket monitoring and pleading review at level relevant to case role [DEs 186 - 189] with NOA document updates and proposed counsel update TXTs re hearing and dialysis service continuity	0.1	395.00	39.50
10/18/2022	EML exchange UST re records access motion and hearing attendance	0.1	395.00	39.50
10/18/2022	GCA: docket monitoring and relevant pleading review at level consistent with role [DE 194 Cerner NOA; 196 utility stmt; UCC counsel NOAs 199-200] .1; review Debtors websites for service offerings/size to develop visit timing strategy and expense/fee time estimates for initial visit and ongoing monitoring - to proposed PCO counsel as requested (1.0)	1.1	395.00	434.50
10/19/2022	Receive EML contacts for CEOs (.1); Draft/send intro EML to CEO team (.1); Call with Matt Roberts after EML bounce [wrong EML provided] (.2); Call with Matt W - intro and discussion re combined or area-based calls (.2) docket monitoring and pleading review/interested party updates at level consistent with PCO role/focus [DE 202-204](.1)	0.7	395.00	276.50
10/20/2022	Reschedule and complete introductory call with Chicago CEOs (.7); follow-up CEOs re travel timing and locations (.3); Docket monitoring and pleading review at level consistent with role with updates to NOA documents (.2)	1.2	395.00	474.00
10/20/2022	Introductory call with LA CEO group (.5); follow up EMLS with org charts for Gardena, Hunt Pk, and Coast (.2);	0.7	395.00	276.50

Total**Payments/Credits****Balance Due**

**Pivot Health Law, LLC**

P.O. Box 69734
Oro Valley, AZ 85737

Invoice**Invoice #:** 1244**Invoice Date:** 11/5/2022**Bill To:**

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File No. 43424

Period: October 12 - 31, 2022

Date	Description	Hours/Qty	Rate	Amount
10/21/2022	Receipt and review of org chart for East LA Dr's (.1); Docket management re NOAs [Med One x2; CMS](.1); review govt cash collateral obj and thermo fish (.1)	0.3	395.00	118.50
10/24/2022	Docket monitoring [DEs 230-232] with NOA updates (.1)	0.1	395.00	39.50
10/27/2022	hearing prep re CA privacy laws (.3); docket monitoring and pleading review at level consistent with role [DE 240, 245--50] (.2); NOAs x2 Blue Cross and Pulm Exchg Obj (.1)	0.6	395.00	237.00
10/28/2022	EMLs East LA and Coast DONs re initial calls next week	0.1	395.00	39.50
10/29/2022	Docket monitoring and pleading review pro hac board representation and ER Motion Modify Dates (.1); follow up Weiss re role obj creditor in operations (.2)	0.3	395.00	118.50
10/31/2022	EML fr creditor regarding case mailings - fwd to Epiq, research creditor for legitimacy versus phishing, and respond re role and noticing agent email	0.1	395.00	39.50
10/31/2022	Draft patient postings in anticipation hearing x7 (.5); Review hearing agenda and Exhibits r/t role (# 3, 4, 9, 10) (.3); attend hearing (.9); follow up UST (.4); call with Coast CNO (.4)	2.5	395.00	987.50
	PROFESSIONAL FEES SUBTOTAL			4,977.00
	EXPENSES			
10/20/2022	PIPELINE CHICAGO SV1 AIRFARE		425.98	425.98
10/20/2022	PIPELINE CHICAGO SV1 AIRFARE		702.98	702.98
10/20/2022	PIPELINE DAL SV1 AIRFARE		292.98	292.98
10/20/2022	PIPELINE LA SV1 AIRFARE		238.98	238.98
10/20/2022	PIPELINE LA SV1 AIRFARE		259.98	259.98
	Total Reimbursable Expenses			1,920.90

Total	\$6,897.90
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Payments/Credits	\$0.00
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Balance Due	\$6,897.90
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**Pivot Health Law, LLC**

P.O. Box 69734
Oro Valley, AZ 85737

Invoice**Invoice #:** 1251**Invoice Date:** 12/5/2022**Bill To:**

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

Period: November 1 - 30, 2022

Date	Description	Hours/Qty	Rate	Amount
11/1/2022	Call with CNO East LA (.7); update Debtor counsel re challenges (.4); docket monitoring and review for items associated with role [DE 289 and research connection] (.2); [DE 293 - mechanic lien and hospital connection Weiss] (.1);	1.4	395.00	553.00
11/2/2022	East LA Call with CEO (.2);	0.2	395.00	79.00
11/3/2022	Gardena/CHHP CEO reach out for CNO contact info (.1); EML Gardena and CHHP CNOs (.1); docket monitoring and pleading review/action relative to role [DEs 308 NOA; 310 time deadline changes] (.1); [DE 313 K rejections] (.1);	0.4	395.00	158.00
11/4/2022	Gardena EML exchgs with CNO re staffing challenges and agency usage (.2); Weiss EML exchgs re org chart, CNO intro, and possible call in advance visit (.3); CHHP introductory call CNO with text follow up debtor counsel (.9); NOAs [DEs 314, 315] (.1); update call with counsel (.3)	1.8	395.00	711.00
11/5/2022	Prepare Exhib B Oct	0.2	395.00	79.00
11/5/2022	EML nsg leadership shot history (.1); initial draft consolidated 2015.1 posting (.1); Prepare initial report layout for Chicago locations (.3); review DE 321 r/t Exhibit recipients relative to locations (.1)	0.6	395.00	237.00
11/6/2022	1/2 non-working travel to ORD (TUS to PHX) 2 hr; (PHX to ORD) 3 hr; (ORD to hotel to site to hotel) 1.6 = 6.6/2 (3.3); intro call with CNO WestSub (.4)	3.7	395.00	1,461.50

Total**Payments/Credits****Balance Due**

**Pivot Health Law, LLC**

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Oro Valley, AZ 85737

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

Period: November 1 - 30, 2022

Date	Description	Hours/Qty	Rate	Amount
11/7/2022	1/2 NW travel to and from Hotel to West Sub 1.2 hr/2 = (.6); Initial mtg leadership and large group (1.7); Plant and warehouse team interaction (1.); wound unit (.2); leadership discussion CNO/CQO (1.1); Pharmacy (.6); Radiology; IR; Supply; Lab (3.1); M/S walk through; Case Mgmt/SW; FBP; and sub-acute (4.3)	12.6	395.00	4,977.00
11/7/2022	Call with Weiss CNO (.1); Call with UST re posting motion (.1); docket monitoring and pleading review at level consistent with role [DEs 328 - 333 with NOA] (.1)	0.3	395.00	118.50
11/8/2022	2d day SV 1 WestSub. Travel in/ from Oak Brook and out to River Forest then Dwnthn (1.7/2 = .9); Meet Int CIO (1.1); Lab pathologist; M/S unit leader and chief hospitalist; FBC director and fellow (2.1); interview rehab team member re sub-acute (.5); PCU leader and team members and resp tx leader (1.1); food service (.5); brief intro surgical services (with remote follow-up needed) and behav health lead discussion (.9); debrief with leadership (.5); River Forest campus total time 1.5 hrs - discount .5 personal discussion (1.0)	8.6	395.00	3,397.00
11/9/2022	Weiss SV1 Day 1: 1/2 NW travel Downtown to hospital .6/2 = (.3); Intro at am huddle to meet team (.5) time with CNO then CEO to understand clinical units & dynamics (2.9)	3.7	395.00	1,461.50

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File No. 43424

Period: November 1 - 30, 2022

Date	Description	Hours/Qty	Rate	Amount
11/9/2022	Weiss SV 1 Day 1 afternoon: Meet with clinical lab and pathologist w/ test debt counsel re histo slides (1.2); ICU (.5); surgery and rehab directors (1.5); supply chain mgr follow up supply challenges (.8); follow up leadership duo (.5); 1/2 rate travel fr hospital to Rogers Park .4/2 = (.2)	4.7	395.00	1,856.50
11/9/2022	Docket monitoring and pleading review/actions consistent with role - DE 338 NOA Citiguard and document updates and DE 344 re Blue Plan Obj (.1)	0.1	395.00	39.50
11/10/2022	Weiss SV 1 Day 2: 1/2 travel hotel Rogers Park to hospital .4/2 = (.2); meet ED team/physician (1.1); time with Rad director (1.7); EVS; HIM; food services; pharmacy warehouse (basement group) (1.8); 4NW, 5NW, therapy director (2.9); Director of Nsg, MOB review, and update CNO (1.5); cath lab/card dir, 3PCU (tele); 7S (geri psych), 6S (cardiology), debrief CEO (1.9); update call UST (.4)	11.5	395.00	4,542.50
11/10/2022	1/2 rate NW travel from hospital to hotel Rosemont/ORD - .8/4 = .4	0.4	395.00	158.00
11/11/2022	1/2 travel Hilton Rosemont to West Sub for follow-up ICU/ED as planned- .6/3 = (.3); TxTs and calls re site visit status with TJC on site upon PCO arrival (.3); connect with radiology director (.2); 1/2 travel hospital to ORD 1.0/2 = (.5); ORD to PHX to TUS - 9.6/2 (4.8)	6.1	395.00	2,409.50
11/11/2022	Docket monitoring and pleading review at level consistent with role (skip schedules and SOFAs) DE 345 - 350 Obj to plan and pro hac addition at 419 (.3)	0.3	395.00	118.50

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Period: November 1 - 30, 2022

Date	Description	Hours/Qty	Rate	Amount
11/13/2022	Docket monitoring and high level pleading review for case dynamics r/t DE 420 - 425 re various objections and admin claim bar date	0.2	395.00	79.00
11/14/2022	1/2 rate non-working travel office - TUS - LAX - 2.1/2 = (1.0); 1/2 travel LAX to Coast .8/2 = (.4); First site visit Coast - intro quality and facility layout (.5); Ex Leaders/Dietary/EVS (1.3); central supply (.6); clinical unit leader review (1.7); Pharmacy (.5); Lab/Rad (1.5); OR/PACU (1.0); new COS and case mgmt (.4); leadership follow-up and IP team member discussion (1.3)	10.2	395.00	4,029.00
11/14/2022	Docket monitoring and high level pleading review with notice document updates for NOAs and pro hac apps [Docket Nos 427 - 445] (included amended DIP; witnesses lists for hrg, govt obj to DS, 11 pleadings)	0.4	395.00	158.00
11/14/2022	1/2 rate NW travel Coast to Hotel .8/2 = (.4)	0.4	395.00	158.00
11/15/2022	1/2 NW travel hotel to East LA .8/2 = (.4); East LA SV 1 - security, facilities, start with CNO/CEO, warehouse (2.3); additional time CEO, sub-acute unit, staffing office and house supervisor (2.0); surgery and radiology (1.4); ICU/Lab (1.3); Pharmacy, Dietary, M/S (1.7) - 1/2 non-working travel fr East LA to hotel - 1.4/2 = (.7); docket monitoring and review with NOA updates to email list and notice document [DEs 449 - 453] (.1); follow up Gardena/Community CEO re site visit timing (.1)	9.1	395.00	3,594.50
11/15/2022	Attend hearing as potential witness for 2015.1 posting motion	0.9	395.00	355.50
11/16/2022		1.2	395.00	474.00

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Date	Description	Hours/Qty	Rate	Amount
11/16/2022	Draft 2015.1 posting follow-up with Weiss and Coast CEOs after message in response MSG re hearing outcome re admission paperwork vs posting (.3); EML Coast CNO re physician creditor (.1); update leadership re time of site visits Community (.1)	0.5	395.00	197.50
11/16/2022	Community site visit #1 - 1/2 rate travel to site .8/2 = (.4); meet with leadership (1.2); ED and EVS (1.0); Lab, Tele, ICU (1.6); M/S, Lab, Radiology (2.1); 1/2 rate travel back to hotel .8/2 = (.4)	6.7	395.00	2,646.50
11/17/2022	Site visit Gardena #1 - 1/2 rate travel to hospital .4/2 = (.2); AM huddle and initial discussions leadership (2.7); ED, Rad, Basement (1.7); therapies, sub-acute on 7th (2.1); 4th, 5th, 6th floors (1.3); 3rd floor and wrap-up leadership (.6)	8.6	395.00	3,397.00
11/17/2022	1/2 rate non-working travel hospital to LAX .6/2 = (.3); LAX wait for flight 3.0/2 = (1.5); LAX to TUS to office 2.0/2 = (1.0) 2.8 less .2 update call = 2.6	2.6	395.00	1,027.00
11/18/2022	Docket monitoring and update to notice documents relative to pro hac requests(x3) [DEs 502 - 512]	0.2	395.00	79.00
11/21/2022	West Sub - follow up hospitalist (.1); Weiss - follow up fr CNO re continued inability to recruit quality assistance and challenges covering (.1)	0.2	395.00	79.00
11/22/2022	WestSub ShareFile begin data review (HAI pp; open position report; subacute staffing regulation; radiology TAT with analysis; quality program policy)	2.5	395.00	987.50

Total

Payments/Credits

Balance Due

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Bill To:

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

Date	Description	Hours/Qty	Rate	Amount
11/23/2022	Docket monitoring and pleading review relative to role to understand case timing and possible patient/staff impacts - DEs 533 - 537 with particular attention to sale proposal overview	0.4	395.00	158.00
11/25/2022	Docket monitoring and high level pleading review relative to case pacing/dynamics - DEs 541 - 545 (.1); review and analyze sample ED throughput file WestSub (.9);	1	395.00	395.00
11/26/2022	WestSub - revise and finalize 2015.1 in lieu service posting (.2); review data analytics and site visit notes, begin drafting WestSub 1st report (1.5 + 1.7 + 2.3) (5.5)	5.7	395.00	2,251.50
11/27/2022	Update final postings for other six hospitals (.3 LA) (.1 RF and Weiss) (.1 DAL); EML exchanges with DAL CEO re revise site visit and documents needed in advance (.2)	0.6	395.00	237.00
11/27/2022	EML follow up CNO & CQO WestSub re data analysis and follow up (.4); follow up rad dir re report analysis (.2); Additional WestSub report edits (.4);	1	395.00	395.00
11/28/2022	Docket monitoring and pleading review at a level consistent with role to understand case pacing and potential impacts - DEs 547 - 553 (with notice date changes Tx/Ca bids) (.1); EML and phone follow up CEO Comm/Gard re posting (.4); initial reach out to schedule intro calls White Rock CNO and CMO (.2);	0.7	395.00	276.50

Total**Payments/Credits****Balance Due**

**Pivot Health Law, LLC**

P.O. Box 69734
Oro Valley, AZ 85737

Invoice**Invoice #:** 1251**Invoice Date:** 12/5/2022

Period: November 1 - 30, 2022

Bill To:

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

Date	Description	Hours/Qty	Rate	Amount
11/28/2022	Docket monitoring - DE 557 Cerner order re retroactive contract rejection and follow up through counsel (.3); update to IL CEOs (.1); DE 554 and 560 (NOA and pro hac) with document updates (.1); Draft, finalize, file consol 2015.1 pleading with EML to CEOs (.2); follow up requests for call re radiology reads for Weiss Rad Dir and RF Dir (.1)	0.8	395.00	316.00
11/28/2022	Begin Drafting Weiss First Report	1.6	395.00	632.00
11/29/2022	follow up calls re radiology reads Weiss (.5); RF (.3); review former fellow ltr re claim 121 (.3); Finish review and analysis of site visit notes and initial draft Weiss first report (2.1); check on MD claim 22 for patient implication (.1); EML follow up WestSub CNO radiology analytics (.1);	3.4	395.00	1,343.00
11/29/2022	Review sale redline and follow up counsel re records exculpation HIPAA wording (.2); Rad Dir West Sub brief call and EML to schedule follow up re reads (.1); NOA DE 577 and document updates (.1); Initial call CMO (.6)	1	395.00	395.00
11/29/2022	Finish edits for pre final drafts Weiss and West Sub Reports and begin initial set up of East LA and Community first reports (1.6); First draft of Coast first report (3.0); Texts and follow up during hearing with proposed PCO counsel (.4)	5	395.00	1,975.00
11/30/2022	Phone call with CQO and Dir Rad re TAT file (.6); based on new information - final edit changes West Sub report (.3) and Weiss (.2);	1.1	395.00	434.50
11/30/2022	Introductory Call White Rock Qual Dir and CNO (1.2); set up Share File - review previous survey findings and follow ups (5 files) (.9)	2.1	395.00	829.50

Total**Payments/Credits****Balance Due**

**Pivot Health Law, LLC**

P.O. Box 69734
Oro Valley, AZ 85737

Invoice**Invoice #:** 1251**Invoice Date:** 12/5/2022**Bill To:**

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

Period: November 1 - 30, 2022

Date	Description	Hours/Qty	Rate	Amount
11/30/2022	docket monitoring and pleading review relative to role - blue line DE 600(.2); NOA DE 598 and file updates (.1)	0.3	395.00	118.50
11/30/2022	Docket monitoring and pleading review at level consistent with role with NOA updates to EML and pleading documents [DE 605, 606]	0.1	395.00	39.50
	Professional Fees Subtotal			49,414.50
11/7/2022	Pipeline SV1 HOTEL (Hilton Oak Brook 2 nights)		312.92	312.92
11/7/2022	Pipeline SV 1 CHI MEALS (Hilton Oak Brook 2 meals)		94.94	94.94
11/8/2022	Pipeline SV1 CHI HOTEL (Courtyard Dwntrn)		262.98	262.98
11/8/2022	Pipeline SV1 CHI PARKING (garage with Courtyard)		59.00	59.00
11/8/2022	Pipeline SV1 CHI Meals (Cucina Paradiso)		32.37	32.37
11/8/2022	Pipeline SV1 MEALS (Cucina Paradiso cash portion)		26.00	26.00
11/9/2022	Pipeline SV 1 CHI HOTEL (Hampton Loyola Station)		184.32	184.32
11/9/2022	Pipeline SV 1 CHI Paking Fees/Tolls (Hampton Parking)		40.00	40.00
11/9/2022	Pipeline SV1 CHI (Loyola Station Hilton) Valet in & out		20.00	20.00
11/9/2022	Pipeline SV1 CHI MEALS (Raising Cane)		15.54	15.54
11/10/2022	Pipeline SV 1 CHI HOTEL (Hilton Rosemont)		200.64	200.64
11/10/2022	Pipeline SV1 CHI CAR RENTAL (Fuel/ Exxon Station)		32.21	32.21
11/10/2022	Pipeline SV1 CHI MEALS (Hilton Rosemont)		28.66	28.66
11/11/2022	Pipeline CHI SV1 CAR RENTAL (National)		673.22	673.22
11/11/2022	Pipeline SV 1 CHI PARKING (Hilton Rosemont Parking)		32.00	32.00
11/11/2022	Pipeline SV1 CHI PARKING FEES (PHX Airport)		84.00	84.00

Total**Payments/Credits****Balance Due**

**Pivot Health Law, LLC**

P.O. Box 69734
Oro Valley, AZ 85737

Invoice**Invoice #:** 1251**Invoice Date:** 12/5/2022

Period: November 1 - 30, 2022

Bill To:

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

Date	Description	Hours/Qty	Rate	Amount
11/11/2022	Pipeline SV1 CHI MEALS (Hub 51 ORD)		15.97	15.97
11/11/2022	Pipeline SV1 CHI MEALS (HUB 51 Cash Portion)		4.00	4.00
11/15/2022	Pipeline SV1 LA MEALS (Hilton Garden Inn Redondo)		13.69	13.69
11/15/2022	PIPELINE SV1 LA CASH FOR MEALS (El Burrito & Hilton)		13.00	13.00
11/16/2022	PIPELINE SV1 LA - CAR RENTAL FUEL (Costco Gas)		23.23	23.23
11/16/2022	Pipeline SV 1 LA - MEALS (Costco)		3.85	3.85
11/16/2022	PIPELINE SV1 LA - MEALS (7-11 Redondo)		18.85	18.85
11/17/2022	Pipeline SV1 LA - AIRFARE (return 11/17/22)		342.98	342.98
11/17/2022	Pipeline SV1 LA - AIRFARE (Refund return on 11/18/22)		-238.98	-238.98
11/17/2022	Pipeline SV1 LA - HOTEL (Homewood Redondo)		732.35	732.35
11/17/2022	Pipeline SV1 LA - CAR RENTAL		452.13	452.13
11/17/2022	Pipeline SV1 LA - PARKING FEES/TOLLS (Homewood Redondo)		54.00	54.00
11/17/2022	Pipeline SV 1 LA PARKING FEES/TOLLS (TUS Airport)		48.00	48.00
11/17/2022	Pipeline SV1 LA - MEALS (Homewood Redondo)		12.00	12.00
11/17/2022	Pipeline SV1 LA - MEALS (Homewood Redondo)		40.49	40.49
11/27/2022	PIPELINE SV1 DAL AIRFARE (Departure Date Change Fee - 4GDIGA)		57.00	57.00
11/27/2022	PIPELINE SV1 DAL AIRFARE COST		312.98	312.98
	Total Reimbursable Expenses			4,004.34

Total	\$53,418.84
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Payments/Credits	\$0.00
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Balance Due	\$53,418.84
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**Pivot Health Law, LLC**

P.O. Box 69734
 Oro Valley, AZ 85737

Invoice**Invoice #:** 1257**Invoice Date:** 1/6/2023**Bill To:**

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

Period: December 1 - 31, 2022

Date	Description	Hours/Qty	Rate	Amount
12/1/2022	1/2 rate NW travel to White Rock for SV 1 - TUS to PHX (auto) (1.8); PHX to DAL (2.5) to hospital (.5) less 0.8 working = 4/2 = 2.0	2	395.00	790.00
12/1/2022	Begin drafting 1st report East LA (.8); Day 1 SV - leadership intro (1.9); ICU; post surgical unit; L&D/PP units and clinical leaders (3.1); 1:1 with outgoing COS and concerns (1.5)	7.3	395.00	2,883.50
12/1/2022	docket review, pleading analysis and follow-up limited to role [DEs 621 - 624] with calendaring and document updates	0.2	395.00	79.00
12/2/2022	White Rock SV1 Day 2: check in with quality leadership (.2); therapies (.5); AM huddle with post discussions with clinical leads (1.1); COO and call Debtor counsel (.3); ED (.4); Radiology, Central Supply, Materials Team (2.1); Food Services (.8); Lab, OR (1.6); Pharmacy (1.4); 4th floor with clinical leadership and facilities (1.2)	9.6	395.00	3,792.00
12/2/2022	1/2 rate non-working travel for transit time (not wait time) = 5/2 = 2.5	2.5	395.00	987.50
12/2/2022	Update call White Rock COS (.1); update counsel (.3)	0.4	395.00	158.00
12/4/2022	Docket monitoring and relevant pleading review [DEs 610, 625, 633 - 640] Update documents relative to NOAs and Pro Hacs	0.3	395.00	118.50
12/5/2022	finish drafting 1st East LA Report (3.2); DE 650 -51, 653, 657 NOA and document updates (.3); EMLs to Chicago teams re reports and update (.1); Draft Community Report (.2.7); DE 659 (.1)	6.4	395.00	2,528.00

Total**Payments/Credits****Balance Due**

**Pivot Health Law, LLC**

P.O. Box 69734
Oro Valley, AZ 85737

Invoice**Invoice #:** 1257**Invoice Date:** 1/6/2023

Period: December 1 - 31, 2022

Bill To:

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

Date	Description	Hours/Qty	Rate	Amount
12/6/2022	Review DE 663 and 664 (.3); follow up with TX team re concerns with pleadings and response (.3); EML update UST (.1); assist with development talking points for team (.3); update call debt counsel (.5); Update call UST (.2); EMLS to locations with finished reports for accuracy review; copy drafts thus far to debtor counsel (.4); EML exchanges re possible motion to clarify off cases in Chicago (.1); Two calls from CNO Weiss (.5 NC)	2.2	395.00	869.00
12/7/2022	Docket monitoring, pleading review at level consistent with role [DEs 670 - 673] with follow up counsel re hearing coverage (.2); EML Vennie re report (.1); [DEs 677 - 684] w/ document updates for notice and calendar changes (.2)	0.5	395.00	197.50
12/8/2022	Read DE 688 LTR and follow up DOQ WhiteRock as potential patient (.2); Initial Draft White Rock Report (3.1); EML WhiteRock Leadership Team for report accuracy review (.1)	3.4	395.00	1,343.00
12/9/2022	Review notes; text follow up ICU/Step Down Mgr, CEO, CNO; initial draft Gardena Rpt	5.3	395.00	2,093.50
12/9/2022	EMLs fr White Rock leaders x4 re report (CEO, COO, CNO DOQ)	0.2	395.00	79.00
12/9/2022	Docket monitoring and pleading review relative to role - DE 711 with notice document updates; DE 712 canceling auction	0.2	395.00	79.00
12/12/2022	Docket monitoring and pleading review relative to role - DE 711 - 715 with notice document and EML distribution list updates (.2); TXTs with East LA CNO and calls with CEO in follow up (.3)	0.5	395.00	197.50

Total**Payments/Credits****Balance Due**

**Pivot Health Law, LLC**

P.O. Box 69734
Oro Valley, AZ 85737

Invoice**Invoice #:** 1257**Invoice Date:** 1/6/2023**Bill To:**

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

Period: December 1 - 31, 2022

Date	Description	Hours/Qty	Rate	Amount
12/12/2022	Final report edits WestSub (.3); Weiss (.3); East LA (.3); Other 4 - .2 ea (.8);	1.7	395.00	671.50
12/12/2022	Draft 1st monthly fee statement, file	1.6	395.00	632.00
12/12/2022	docket monitoring and pleading review relative to role [DEs 727 - 742 with updates notice documents] (.2); sort through objection pleadings - sampling two to confirm cure amt topics (.2); DE 754 ER order re changing confirm dates (.2)	0.6	395.00	237.00
12/13/2022	Docket monitoring and document updates for pro hac and NOAs - DE 757, 760, 761, 767, 770 (.2); change dates relative to DE 762 (.1); Update White Rock CQO re patient follow ups on mailings and case status (.4); update call WhiteRock Pharmacist (.2); Exhib B Nov (.4)	1.3	395.00	513.50
12/16/2022	docket monitoring, pleading review, and document/calendar updates at level consistent with role - DEs 785, 790, 792, 796-99; 800-804; 820 - (.5)	0.5	395.00	197.50
12/19/2022	docket monitoring, pleading review relative to role - DEs 827 - 843 w/ review 5 docs	0.3	395.00	118.50
12/20/2022	Draft CNO for first monthly fee statement (.1); docket monitoring, pleading review, document updates consistent with role DEs 845, 851, 857 (.2); Prepare, finalize and file second monthly fee app(.9)	1.2	395.00	474.00
12/21/2022	Site update call White Rock	0.5	395.00	197.50
12/22/2022	EML to Coast CNO/Dir Qual re request for quality data in ShareFile folder (.1); EML to Gardena CNO re quality data needs in ShareFile (.1); EML East LA DON re quality data needs and ShareFile link (.1); follow up exchange East LA DON re additional quality data support staff resources (.1);	0.4	395.00	158.00

Total**Payments/Credits****Balance Due**

**Pivot Health Law, LLC**

P.O. Box 69734
Oro Valley, AZ 85737

Invoice**Invoice #:** 1257**Invoice Date:** 1/6/2023**Bill To:**

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

Period: December 1 - 31, 2022

Date	Description	Hours/Qty	Rate	Amount
12/27/2022	Call with Dr. Culpen re quality data needs and his role (.8); follow up exchg Gardena CNO re his assistance (.1); EML from Quality staff member East LA (.1); review initial data load (.4); EML follow up for additional info (.1); Docket monitoring with pro hac DE 887 with notice updates (.1); EML exchg CEO WhiteRock re coverage Dir Rad and COO reporting, question physicist report receipt (.1)	1.7	395.00	671.50
12/28/2022	EML exchg Ankura re first monthly fee stmt (.1); More follow up WhiteRock re coverage (.1); NOA DeMarco for CBRE and document updates (.1)	0.3	395.00	118.50
12/29/2022	Call with WhiteRock DON to check in (.6); EML exchg for check in call with Coast CNO/CEO (.1)	0.7	395.00	276.50
12/30/2022	EML chain from White Rock re current rad equipment physicist reports and additional scheduled (.1); Docket monitoring and pleading review DEs 917, 922, 925 with notice updates (.2)	0.3	395.00	118.50
	Professional Fees Subtotal			20,579.50
12/1/2022	Pipeline SV1 DAL AIRFARE (Change later return flight)		87.00	87.00
12/1/2022	Pipeline SV1 DAL MEALS		16.02	16.02
12/1/2022	Pipeline SV1 DAL MEALS (Starbucks)		11.40	11.40
12/1/2022	Pipeline SV 1 DAL MEALS (Chick fil A)		10.66	10.66
12/2/2022	Pipeline SV1 DAL HOTEL (Doubletree Campbell Centre)		192.48	192.48
12/2/2022	Pipeline SV1 DAL CAR RENTAL		210.68	210.68
12/2/2022	Pipeline SV 1 DAL PARKING FEES/TOLLS (PHX Airport)		28.00	28.00
	Total Reimbursable Expenses			556.24

Total	\$21,135.74
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Payments/Credits	\$0.00
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Balance Due	\$21,135.74
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**Pivot Health Law, LLC**

P.O. Box 69734
Oro Valley, AZ 85737

Invoice**Invoice #:** 1263**Invoice Date:** 2/10/2023**Bill To:**

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

Period: January 1 - 31, 2023

Date	Description	Hours/Qty	Rate	Amount
1/2/2023	EML follow ups re quality data and request for CNO check ins x5 (.3); analysis oct/nov invoices to assign time by Debtor (1.6 PL rate = .9)	1.2	395.00	474.00
1/3/2023	Call CNO Coast (.6); Call quality director Gardena/Community (.2); follow-up add new quality contacts for Coast (.1); Review Docket No. 946 - follow up patient (.2); Call White Rock Quality Nurse re patient and updates (.3)	1.4	395.00	553.00
1/4/2023	CNO for 2d mo fee app	0.1	395.00	39.50
1/5/2023	Docket monitoring and document/EML list updates per DE 961 (.1); call with East LA CNO (.5)	0.6	395.00	237.00
1/6/2023	Update call Gardena CNO (.5); TXT exchanges with Community to reschedule call (.1)	0.6	395.00	237.00
1/9/2023	review revised schedule H (.1)	0.1	395.00	39.50
1/9/2023	Update call with CNO Community	0.6	395.00	237.00
1/10/2023	Follow up call White Rock CNO (.3); DE monitoring and document updates pro hac 970 and NOA 971 (.1)	0.4	395.00	158.00
1/11/2023	Docket monitoring and general pleading review for case dynamics at level consistent with PCO role - DEs 973, 991, and 975	0.3	395.00	118.50
1/12/2023	high level docket pleading tracking to understand case dynamics in advance of confirmation hearing (DEs 994 - redline); 996 witness list (.1); follow up PCO counsel (.1)	0.2	395.00	79.00
1/12/2023	Call attempt and follow up re scheduled call with Coast CEO (.2); call with corporate CMO (also assigned to DAL) (.3); DE 1000 (.1)	0.6	395.00	237.00
1/13/2023	Docket updates in advance of confirmation hearing DEs 1020, 1032, 1033 (.4); NOA Intuitive (.1); Attend confirmation hearing (1.0)	1.5	395.00	592.50

Total**Payments/Credits****Balance Due**

**Pivot Health Law, LLC**

P.O. Box 69734
Oro Valley, AZ 85737

Invoice**Invoice #:** 1263**Invoice Date:** 2/10/2023**Bill To:**

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

Period: January 1 - 31, 2023

Date	Description	Hours/Qty	Rate	Amount
1/15/2023	VMX from patients daughter with immediate care complaint (Community) - including assertion finance related with attempted return call and VMX left with complainant (.1); Call CNO - VMX; attempted call CEO no VMX (.1); EML follow up CNO, CEO, Dept Dir (.2); Two phone calls with CNO (.3); Transcribe original VMX to CNO as well as review her message rec'd from complainant (.3)	1	395.00	395.00
1/16/2023	Prepare Exhib B by location (.5)	0.5	395.00	197.50
1/19/2023	Docket monitoring and pleading review - update to notice documents per DE 1062 NOA	0.1	395.00	39.50
1/20/2023	Txt and call with interim Coast CEO (.3); Docket monitoring and pleading review - read Lifestream obj because of patient care implication (.1); Preparation 3d Mo fee (.9); EML follow up re anticipated service final (.1)	1.6	395.00	632.00
1/24/2023	EML exchgs with FA and PCO counsel re fee budgets requests and review data and trends to estimate (.2)	0.2	395.00	79.00
1/25/2023	check in call with White Rock CNO (.2);	0.2	395.00	79.00
1/26/2023	Call Debtor counsel re plan effective date relative to reports and visit needs (.2)	0.2	395.00	79.00
1/26/2023	check in call with Coast DON	0.2	395.00	79.00
1/30/2023	Update PCO counsel re visits, reports relative to plan effective date (.1); Draft and file 2d 2015.1 (.2)	0.3	395.00	118.50
1/31/2023	docket monitoring and pleading review - DE 1086 relative to confirm effective date change (.1); EML CA Quality teams (.1); EML response Gardena and East LA re data available (.1); EML corp quality to add person East LA file (.1); review and analyze Community data (.8); EML DAL location re quality data (.1)	1.3	395.00	513.50

Total	\$5,214.00
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Payments/Credits	\$0.00
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Balance Due	\$5,214.00
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**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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Exhibit D
Proposed Form of Order

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

IN RE:

PIPELINE HEALTH SYSTEMS, LLC, *et al.*,¹

DEBTORS.

§
§
§
§
§
§

CASE NO. 22-90291(MI)
(Chapter 11)
(Jointly Administered)

**ORDER APPROVING FIRST AND FINAL APPLICATION OF SUSAN N. GOODMAN,
PATIENT CARE OMBUDSMAN, FOR ALLOWANCE OF COMPENSATION AND
REIMBURSEMENT OF EXPENSES FOR PERIOD
OCTOBER 12, 2022, THROUGH AND INCLUDING FEBRUARY 17, 2023**

The court having considered the *First and Final Application of Susan N. Goodman, Patient Care Ombudsman, for Allowance of Compensation and Reimbursement of Expenses for Period October 12, 2022, through and including February 17, 2023* (the “**Application**”), and it appearing to the court that (a) the compensation was reasonable and necessary; (b) notice of the Application was sufficient, appropriate, and in accordance with Local Bankruptcy Rules of this District and the Federal Rules of

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](http://dm.epiq11.com/Pipeline%20Health). The Debtors’ service address is 898 N. Pacific Coast Highway, Suite 700, El Segundo, CA 90245.

Bankruptcy Procedure; (c) no objections or responsive pleadings have been filed; and, (d) good cause exists to grant the Application;

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED AS FOLLOWS:

1. The Application is APPROVED.
2. The Applicant is awarded, on a final basis, fees of \$83,345.00 and reimbursement of actual and necessary expenses in the amount of \$6,481.48, collectively totaling **\$89,826.48** (the “Award”) for services rendered as the Patient Care Ombudsman for the period from October 12, 2022, through February 17, 2023.
3. The Applicant’s previously paid interim fees and expenses are approved on a final basis.
4. The Debtors are authorized to pay all remaining unpaid fees and expenses to Applicant through PIVOT HEALTH LAW, LLC.
5. This Order shall take effect immediately upon entry, and the court shall retain jurisdiction to implement, enforce, and interpret this Order.

###END OF ORDER###

SUBMITTED BY:

By: /s/ Susan N. Goodman, RN JD
Texas Bar No. 24117585
PIVOT HEALTH LAW, LLC
P.O. Box 69734
Oro Valley, AZ 85737
520.744.7061 (message number)
sgoodman@pivothealthaz.com
Patient Care Ombudsman