

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:)	
)	Chapter 11
)	
GENESIS HEALTHCARE, INC., <i>et al.</i> , ¹)	Case No. 25-80185 (SGJ)
)	
Debtors.)	(Jointly Administered)
)	
)	Related to Docket Nos. 212, 689

**DECLARATION OF DISINTERESTEDNESS OF KLASKO IMMIGRATION LAW
PARTNERS LLP PURSUANT TO THE ORDER AUTHORIZING
THE DEBTORS TO RETAIN AND COMPENSATE
PROFESSIONALS UTILIZED IN THE ORDINARY COURSE OF BUSINESS**

I, Andrew Zeltner, pursuant to 28 U.S.C. § 1746, hereby submit this declaration (this “Declaration”) as follows:

1. I am a Partner of Klasko Immigration Law Partners LLP (the “Company”), which maintains offices at 2000 Market Street, Suite 1050, Philadelphia, PA 19103.

2. This Declaration is submitted in connection with an order of the United States Bankruptcy Court for the Northern District of Texas, Dallas Division, entered on August 28, 2025, authorizing Genesis Healthcare, Inc. and certain of its affiliates and subsidiaries, as debtors and debtors-in-possession (collectively, the “Debtors”), to retain and compensate certain professionals in the ordinary course of business during the pendency of the Debtors’ chapter 11 cases (collectively, the “Chapter 11 Cases”).

¹ The last four digits of Genesis Healthcare, Inc.’s federal tax identification number are 4755. There are 299 Debtors in these chapter 11 cases, which are being jointly administered for procedural purposes only. A complete list of the Debtors and the last four digits of their federal tax identification numbers are not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://dm.epiq11.com/Genesis>. The location of Genesis Healthcare, Inc.’s corporate headquarters and the Debtors’ service address is 101 East State Street, Kennett Square, PA 19348.

3. The Debtors have requested that the Company provide immigration legal services to the Debtors, namely Genesis Healthcare, Inc. and certain of its affiliate and subsidiaries, and the Company has agreed to provide such services.

4. The Company may have performed services in the past, may currently perform services and may perform services in the future, in matters unrelated to the Chapter 11 Cases, for persons that are parties-in-interest in the Chapter 11 Cases. To the best of my knowledge, the Company does not perform services for any such person in connection with the Chapter 11 Cases, or have any relationship with any such person, its attorneys, or its accountants that would be adverse to the Debtors or their estates with respect to the matter on which the Company is proposed to be employed.

5. Neither I nor any Partner of, or professional employed by, the Company, insofar as I have been able to ascertain, holds, or represents any interest adverse to, the Debtors or their estates with respect to the matter(s) upon which the Company is to be employed.

6. The Company is conducting further inquiries regarding its retention by any creditors of the Debtors, and upon conclusion of that inquiry, or at any time during the period of its employment, if the Company should discover any facts bearing on the matters described herein, the Company will supplement the information contained in this Declaration.

7. The Company is a legal services firm.

8. The Company provided services to the Debtors prior to the filing of the Chapter 11 Cases on July 9, 2025.

9. The Company's current customary rates, subject to change from time to time, are primarily based on a flat fee schedule. In the normal course of its business, the Company revises its billing rates in January of each year and requests that, effective January 1 of each year, the aforementioned flat fee rates be revised to the regular flat fee rates which will be in effect at that time.

10. Neither I nor a Partner of, or professional employed by, the Company has agreed to share or will share any portion of the compensation to be received from the Debtors with any other person other than the principals and regular employees of the Company, as permitted by 11 U.S.C. § 504(b).

11. The Debtors owe the Company \$404,847.96 for prepetition services, the payment of which is subject to limitations contained in the United States Bankruptcy Code, 11 U.S.C. §§ 101-1532.

12. I understand that the amount owed by any of the Debtors to the Company for prepetition services will be treated as a general unsecured claim and, as such, the Company may file a proof of claim. I further understand that this Declaration will not suffice as the Company's proof of claim.

13. The Company does not hold a retainer that is applicable to postpetition services.

14. As of July 9, 2025, the Company was not party to an agreement for indemnification with certain of the Debtors (the "OCP Agreement").

I declare under penalty of perjury that, to the best of my knowledge and belief after reasonable inquiry, the foregoing is true and correct.

Executed on this 12th day of August 2025.

Andrew Zeltner, Esq.

A handwritten signature in blue ink, appearing to read 'Andrew Zeltner', is written above a horizontal line.