

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

In re:	§	Case No. 25-80185-SGJ-11
	§	
GENESIS HEALTHCARE, INC., et al.,	§	(Jointly Administered)
	§	
Debtors. ¹	§	Chapter 11
	§	

**SUPPLEMENTAL DECLARATION OF JENNIFER S. FEENEY IN SUPPORT OF THE
APPLICATION OF PATIENT CARE OMBUDSMAN MELANIE CYGANOWSKI
FOR ENTRY OF AN ORDER AUTHORIZING RETENTION AND
EMPLOYMENT OF OTTERBOURG P.C.**

Pursuant to 11 U.S.C. § 1746, I, Jennifer S. Feeney, hereby declare:

1. I am currently a member of the firm of Otterbourg P.C. (“Otterbourg”), which maintains an office at 230 Park Avenue, New York, New York 10169-0075. Except as otherwise noted, I have personal knowledge of the matters set forth herein.

2. I submit this supplemental declaration (“Supplemental Declaration”) in support of the *Application of Patient Care Ombudsman Melanie Cyganowski for Entry of an Order Authorizing the Retention and Employment of Otterbourg P.C.* [Dkt. No. 789] (“Application”) and to update the disclosures contained in my original declaration (“Original Declaration”), attached as Exhibit A to the Application.²

3. Specifically, my Original Declaration included the results of a comparison between Otterbourg’s Client Database and a list of Potential Parties In Interest in these Cases. The

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. 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/case/Genesis>. The location of Genesis Healthcare, Inc.’s corporate headquarters and the Debtors’ service address is 101 East State Street, Kennett Square, PA 19348.

² Capitalized terms used but not defined herein have the meaning given in the Original Declaration.

connections discovered as a result of that comparison were reflected in Schedule 2 to the Original Declaration.

4. Since submitting the Original Declaration, I have caused an attorney at Otterbourg to identify additional Potential Parties In Interest that were publicly identified after the review conducted in connection with the Original Declaration. A list of the additional Potential Parties In Interest Otterbourg has since identified is attached here as ***Supplemental Schedule 1***.

5. To the best of my knowledge, neither I nor any member, counsel or associate of Otterbourg represents professionally or is associated with the Potential Parties In Interest listed on Supplemental Schedule 1, except as follows:

INTERESTED PARTY	RELATIONSHIP TO DEBTORS	RELATIONSHIP TO OTTERBOURG
Houlihan Lokey Capital, Inc.	Proposed Investment Banker for the Committee	Former Client in Closed Matter Unrelated to these Cases

6. Otterbourg will continue to review the docket in these Cases for additional Potential Parties In Interest, and promptly disclose any additional information pertinent to the statements made herein.

Pursuant to 11 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: September 9, 2025

/s/ Jennifer S. Feeney
Jennifer S. Feeney

SUPPLEMENTAL SCHEDULE 1

Additional Potential Parties In Interest

Debtor Ordinary Course Professionals

Ross Brittain & Schonberg, Co., L.P.A.

Gordon Rees Scully Mansukhani, LLP

Kay Law Firm LLC

Gregory S. Richters

Law Office of Carlos E. Martinez, LLC

Haynes & Boone, LLP

Bragdon Baron & Kossayda PC

Burr & Foreman

Goldman Gruder Woods, LLC

Hiring Incentives, Inc.

Kennedy, PC Law Offices

Marshall Dennehey

Committee Professionals

Houlihan Lokey Capital, Inc.

FTI Consulting, Inc.

Committee Members

Change Healthcare Operations, LLC

Change Healthcare Technologies, LLC

BFW, LLC

Sunset-Herman-Frankel-Fleishman, LLC

Aculabs, Inc.