

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:	§	Chapter 11
WHITE ROCK MEDICAL CENTER, LLC, <i>et al.</i> ,	§	Case No. 26-90115 (ARP)
Debtors. ¹	§	Jointly Administered

**APPLICATION FOR ENTRY OF AN ORDER AUTHORIZING
THE EMPLOYMENT AND RETENTION OF KANE RUSSELL
COLEMAN LOGAN PC AS COUNSEL TO SUSAN N. GOODMAN,
PATIENT CARE OMBUDSMAN, EFFECTIVE AS OF FEBRUARY 20, 2026**

IF YOU OBJECT TO THE RELIEF REQUESTED, YOU MUST RESPOND IN WRITING. UNLESS OTHERWISE DIRECTED BY THE COURT, YOU MUST FILE YOUR RESPONSE ELECTRONICALLY AT [HTTPS://ECF.TXSB.USCOURTS.GOV/](https://ecf.txsb.uscourts.gov) WITHIN TWENTY-ONE (21) DAYS FROM THE DATE THIS APPLICATION WAS FILED. IF YOU DO NOT HAVE ELECTRONIC FILING PRIVILEGES, YOU MUST FILE A WRITTEN OBJECTION THAT IS ACTUALLY RECEIVED BY THE CLERK WITHIN TWENTY-ONE DAYS FROM THE DATE THIS APPLICATION WAS FILED. OTHERWISE, THE COURT MAY TREAT THE PLEADING AS UNOPPOSED AND GRANT THE RELIEF REQUESTED.

TO THE HONORABLE ALFREDO R. PÉREZ,
UNITED STATES BANKRUPTCY JUDGE:

Patient Care Ombudsman Susan N. Goodman (the “Ombudsman”), by and through her undersigned proposed counsel, and hereby files this application (the “Application”) for entry of an order substantially in the form attached hereto as **Exhibit A** (the “Proposed Order”) authorizing the employment, retention, and compensation of Kane Russell Coleman Logan PC (“KRCL”) as counsel to the Ombudsman, effective as of February 20, 2026, pursuant to sections 105(a), 327, 330 and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rules 2014 and 2016

¹ The Debtors in these Chapter 11 Cases and the last four digits of each of their federal identification numbers are White Rock Medical Center, LLC (6083); NCP Management, LLC (8327); North Houston Surgical Hospital, LLC (2161); National Payroll Services, LLC (3573); Heights Healthcare of Texas, LLC (0118); Heights Healthcare of Houston, LLC (3093); Ashland Healthcare, LLC (0023). The location of the Debtors’ corporate headquarters and the Debtors’ service address is 1917 Ashland Street, Houston, Texas 77008.

of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rules 2014-1 and 2016-1 of the Bankruptcy Local Rules for the United States Bankruptcy Court for the Southern District of Texas (the “Local Rules”). In support of this Application, the Ombudsman submits the *Declaration of J. Casey Roy in Support of the Application for Entry of an Order Authorizing the Employment and Retention of Kane Russell Coleman Logan PC as Counsel to Susan N. Goodman, Patient Care Ombudsman, Effective as of February 20, 2026* (the “Roy Declaration”) attached hereto as **Exhibit B**. In further support of this Application, the Ombudsman respectfully represents as follows:

JURISDICTION AND VENUE

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1334(b). This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b). The Ombudsman consents to the entry of a final order by the Court in connection with the Application.

2. Venue is proper before this Court pursuant to 28 U.S.C. § 1408 and 1409.

3. The statutory and legal predicates for the relief requested herein are Bankruptcy Code sections 105(a), 327, 330 and 331 of the Bankruptcy Code. Relief is also proper pursuant to Bankruptcy Rules 2014 and 2016 and Local Rules 2014-1 and 2016-1.

BACKGROUND

4. On January 20, 2026 (the “Petition Date”), each of the above-captioned debtors (the “Debtors”) filed a voluntary petition for relief under Chapter 11 of the Bankruptcy Code (the “Bankruptcy Cases”). Pursuant to Bankruptcy Code sections 1107(a) and 1108, the Debtors are continuing to operate their businesses and manage their financial affairs as debtors-in-possession.

5. On January 23, 2026, the Court entered its *Order Directing Joint Administration of Chapter 11 Cases* [ECF No. 14].

6. On February 18, 2026, the United States Trustee filed its *Notice of Appointment of Patient Care Ombudsman Under 11 U.S.C. § 333* [ECF No. 104], appointing Susan N. Goodman as the patient care ombudsman in the Bankruptcy Cases.

RELIEF REQUESTED AND BASES THEREFOR

7. By this Application, the Ombudsman requests entry of an order, substantially in the form of the Proposed Order, authorizing the Ombudsman to retain and employ KRCL as her counsel in these Bankruptcy Cases, *nunc pro tunc* to February 20, 2026.

8. Pursuant to Local Rule 2014-1(b)(1), this Application is filed within 30 days² of the commencement of KRCL's provision of services to the Ombudsman and is therefore deemed contemporaneous.

A. KRCL Qualifications

9. KRCL specializes in complex commercial litigation and bankruptcy and restructuring, among other areas. KRCL has offices in Dallas, Houston, and Austin, Texas. KRCL is a mid-sized law firm with a national bankruptcy practice.

10. KRCL's substantial experience with commercial litigation and bankruptcy and restructuring practice before this Court, and knowledge of the Local Rules and practices make it substantively and geographically ideal to efficiently serve the needs of the Ombudsman with regard to this and related matters. KRCL and its attorneys have represented Chapter 11 creditors, official committees, debtors, and post-confirmation trustees nationally and throughout the state of Texas, including the Southern District of Texas. In addition, KRCL counsel Casey Roy, who will serve as lead counsel to the Ombudsman in this matter, currently represents Ms. Goodman in her role as one of three patient care ombudsmen in *In re Genesis Healthcare, Inc., et al.*, Case No. 25-

² The 30th day after the commencement of KRCL's services on behalf of the Ombudsman was Sunday, March 22, 2026. Pursuant to Fed. R. Bankr. P. 9006(a)(1)(C), this period is extended to Monday, March 23, 2026.

80185 (SGJ) in the United States Bankruptcy Court for the Northern District of Texas, Dallas Division. Mr. Roy previously represented Ms. Goodman in her role as patient care ombudsman in *In re Steward Health Care System LLC, et al.*, Case No. 24-90213 (CML) and *In re Wellpath Holdings, Inc., et al.*, Case No. 24-90533 (ARP), both in the United States Bankruptcy Court for the Southern District of Texas, Houston Division. Mr. Roy previously worked for approximately 12 years as an Assistant Attorney General with the Office of the Attorney General of Texas, where he routinely represented, *inter alia*, the Texas Health and Human Services Commission and the Texas Medical Board in bankruptcy courts. More recently, Mr. Roy served as a Trial Attorney in the Office of the United States Trustee for Region 7. In each of these capacities, Mr. Roy regularly confronted issues commonly associated with the Ombudsman role.

11. The size and geography associated with locations at which the Ombudsman serves in these jointly administered cases is most appropriately addressed through the Ombudsman focusing on the clinical aspects of this case and seeking assistance of counsel for the bankruptcy-related, legal services topics associated with discharging her Ombudsman duties in connection with these Bankruptcy Cases.

12. The Ombudsman has been informed that Mr. Roy, Sr. Attorney at KRCL, as well as other attorneys of KRCL who will or may provide services to the Ombudsman in these Bankruptcy Cases, are members in good standing of, among others, the State Bar of Texas.

B. Scope of Services

13. The Ombudsman anticipates that KRCL will, among other things, provide the following legal services (the “Services”):

- a. Advise the Ombudsman regarding the Ombudsman’s powers and duties under applicable law with respect to the Ombudsman’s role in these Bankruptcy Cases, including topics associated with patient notice and records;

- b. Serve as counsel of record for the Ombudsman in all legal aspects of these Bankruptcy Cases, including without limitation, the prosecution of actions on behalf of the Ombudsman that are necessary and appropriate to monitor the quality of patient care and to represent the interests of Debtors' patients;
- c. Prepare pleadings in connection with the foregoing Services; and
- d. Appear before this Court to represent the interests of the Ombudsman in connection with the foregoing Services.

14. The Ombudsman's representation by KRCL with respect to the Services will be reasonably coordinated to avoid service duplication, in the best interests of the Debtors' estates.

C. KRCL Disinterestedness and Disclosures

15. As more fully set forth in the Roy Declaration attached hereto as **Exhibit B**, KRCL reviewed the list of Debtors from the website of the Debtors' claims and noticing agent at <https://dm.epiq11.com/case/whiterockmedicalcenter/info>. KRCL also reviewed the parties listed on **Schedule 1** (Potential Parties in Interest) attached to the Roy Declaration. KRCL then ran the list of Debtors and the Potential Parties in Interest through its conflicts system.

16. KRCL's conflict search resulted in the disclosures as set forth on **Schedule 2** to the Roy Declaration. KRCL does not represent, or have any other connection with, any of the Debtors or the Potential Parties in Interest, subject to the disclosures set forth on **Schedule 2** to the Roy Declaration. While employed by the Ombudsman, KRCL will not represent any entity having an adverse interest to the Ombudsman and will not represent any such parties in any matter related to the Debtors or in connection with these Bankruptcy Cases.

17. The Ombudsman does not believe that KRCL's representation of any interested party or its affiliate(s) in unrelated matters will impair KRCL's ability to represent the Ombudsman as counsel in connection with these Bankruptcy Cases. The Ombudsman has been informed that KRCL will conduct an ongoing review of its files to ensure that no disqualifying circumstances arise. To the extent that KRCL discovers any connection with any interested party or enters into

any new relationship with any interested party, KRCL will promptly supplement its disclosures to the Court.

18. Based on the Roy Declaration, the Ombudsman submits that KRCL is a “disinterested person” as that term is defined in section 101(14) of the Bankruptcy Code, and neither represents nor holds an interest materially adverse to the interests of the Ombudsman, or the Debtors or their estates with respect to the matters on which KRCL is to be employed.

D. Compensation

19. The Ombudsman understands and has agreed that KRCL intends to apply to this Court for allowance of compensation and reimbursement of expenses in accordance with the applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and any further orders of this Court for all services performed and expenses incurred since February 20, 2026.

20. The rates charged are standard hourly rates for work of this nature for attorneys that may work on this matter, subject to annual adjustment to reflect economic and other conditions, are as follows:

Title	Rates
Directors	\$400-\$1,025
Senior Attorneys	\$535-\$715
Associates	\$320-\$580
Paraprofessionals	\$135-\$355

21. The Ombudsman expects that, subject to the possibility of rare exceptions, attorney Casey Roy, whose hourly rate is \$715, will be the only KRCL attorney working on this matter. The Firm has agreed to provide the Ombudsman with notice prior to any professional whose hourly rate is higher than \$715 providing services to the Ombudsman.

22. KRCL will charge for expenses in a manner and at rates consistent with charges made generally to its other clients and in accordance with the Bankruptcy Rules, Local Rules, and

any applicable orders of this Court. Such expenses include, among other things, mail and express mail charges, special or hand delivery charges, travel expenses, and expenses for computerized research.

E. KRCL's Retention is Necessary and Warranted in these Bankruptcy Cases

23. The Ombudsman has determined that the retention of KRCL is necessary for the performance of her duties in these Bankruptcy Cases and that such retention will be in the best interests of the Debtors' patients.

24. The Ombudsman further asserts that the information set forth in this Application, together with the information in the Roy Declaration, meets the requirements for retention of professionals as set forth in Bankruptcy Rules 2014(a) and 2016, as well as Local Rules 2014-1(a) and 2016-1.

25. No previous request for relief sought herein has been made to this Court or any court.

F. United States Trustee Guidelines

26. The Executive Office for the United States Trustee (the "EOUST") has adopted the *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases* (the "Appendix B Guidelines"). By their terms, the Appendix B Guidelines "apply to the [U.S. Trustee's] review of applications for compensation filed by attorneys in larger chapter 11 cases," and are intended as an update to the original *Guidelines for Reviewing Applications for Compensation Filed Under 11 U.S.C. § 330*, adopted by the EOUST in 1996 (the "Appendix A Guidelines" and, together with the Appendix B Guidelines, the "U.S. Trustee Guidelines"). KRCL will make reasonable efforts to comply with the U.S. Trustee's requests for information and additional disclosures as set forth in the U.S.

Trustee Guidelines, both in connection with this Application and any interim and final fee applications to be filed by KRCL.

NOTICE

27. To the extent a hearing is set on the relief requested in this Application, notice of such hearing will be provided by the Ombudsman in accordance and compliance with Bankruptcy Rules 4001 and 9014, as well as the Local Rules, and is sufficient under the circumstances. The Ombudsman will provide notice to parties in interest, including on the Debtors' Master Service List.

WHEREFORE, the Ombudsman requests that this Court enter an order (i) substantially in the form of the Proposed Order granting the relief as requested herein, and (ii) granting the Ombudsman such other and further relief and is just and proper.

Dated: March 23, 2026

Respectfully submitted,

KANE RUSSELL COLEMAN LOGAN PC

By: /s/ J. Casey Roy

J. Casey Roy
State Bar No. 00791578
401 Congress Avenue
Suite 2100
Austin, TX 78701
Phone: 512-487-6572
Email: CRoy@krcl.com

PROPOSED COUNSEL TO SUSAN N.
GOODMAN, PATIENT CARE OMBUDSMAN

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on March 23, 2026, he caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ J. Casey Roy _____
J. Casey Roy

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	Chapter 11
	§	
WHITE ROCK MEDICAL CENTER, LLC, et al.,	§	Case No. 26-90115 (ARP)
	§	
Debtors¹.	§	Jointly Administered

**ORDER AUTHORIZING THE EMPLOYMENT AND RETENTION OF KANE
RUSSELL COLEMAN LOGAN PC AS COUNSEL TO SUSAN N. GOODMAN,
PATIENT CARE OMBUDSMAN, EFFECTIVE AS OF FEBRUARY 20, 2026**

Upon the application (the “Application”²) of Patient Care Ombudsman Susan N. Goodman (the “Ombudsman”) for entry of an order authorizing the Ombudsman to employ and retain Kane Russell Coleman Logan PC (“KRCL”) as her counsel, effective as of February 20, 2026, pursuant to section 327, 330 and 331 of the Bankruptcy Code; and upon the Roy Declaration attached to the Application as Exhibit B; and the Court having jurisdiction pursuant to 28 U.S.C. §§ 157 and 1334 to consider the Application and the relief requested therein; and venue being proper in this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court being satisfied that notice of the Application and the opportunity for a hearing on the Application was appropriate under the particular circumstances and no further or other notice need be given; and the Court being satisfied, based on the representations made in the Application and the Roy Declaration that KRCL does not represent or hold any interest materially adverse to the Ombudsman, the Debtors or their estates as to the matters upon which KRCL has been and is to be employed, and that KRCL is a

¹ The Debtors in these Chapter 11 Cases and the last four digits of each of their federal identification numbers are White Rock Medical Center, LLC (6083); NCP Management, LLC (8327); North Houston Surgical Hospital, LLC (2161); National Payroll Services, LLC (3573); Heights Healthcare of Texas, LLC (0118); Heights Healthcare of Houston, LLC (3093); Ashland Healthcare, LLC (0023). The location of the Debtors’ corporate headquarters and the Debtors’ service address is 1917 Ashland Street, Houston, Texas 77008.

² Capitalized terms used by not otherwise defined herein shall have the meanings ascribed to them in the Application.

“disinterested person” as such term is defined in section 101(14) of the Bankruptcy Code; and that while employed by the Ombudsman, KRCL will not represent any other person or entity having an adverse interest in connection with these Bankruptcy Cases; and this Court having determined that the legal and factual bases set forth in the Application and the Roy Declaration establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is hereby ORDERED as follows:

1. The Application is APPROVED as set forth herein.
2. Pursuant to section 327, 330 and 331 of the Bankruptcy Code, Bankruptcy Rules 2014 and 2016, and Local Rules 2014-1 and 2016-1, the Ombudsman is authorized to employ and retain KRCL as her counsel, effective *nunc pro tunc* as of February 20, 2026, as modified by the terms of this Order.
3. KRCL shall apply for compensation and professional services rendered and reimbursement of expenses incurred in connection with the Debtors’ Bankruptcy Cases in compliance with sections 330 and 331 of the Bankruptcy Code, and applicable provisions of the Bankruptcy Rules, the Local Rules, and such other procedures as may be fixed by order of this Court.
4. Notice of the Application provided by the Ombudsman is deemed to have been good and sufficient and the requirements of the Local Rules are satisfied by the contents of the Application.
5. KRCL will review its files periodically during the pendency of these Bankruptcy Cases to ensure that no conflicts or other disqualifying circumstances exist or arise. If any new relevant facts or relationships are discovered or arise, KRCL will use reasonable efforts to identify

such further developments and will promptly file a supplemental declaration, as required by Bankruptcy Rule 2014(a).

6. The Ombudsman and KRCL are authorized and empowered to take all actions they deem necessary and appropriate to effectuate the relief granted pursuant to this Order in accordance with the Application.

7. KRCL shall provide ten-business-days' notice to the Debtors, the U.S. Trustee, and the Committee before any increases in the rates set forth in the Application are implemented and shall file such notice with the Court. The U.S. Trustee retains all rights to object to any rate increase on all grounds, including the reasonableness standard set forth in section 330 of the Bankruptcy Code, and the Court retains the right to review any rate increase pursuant to section 330 of the Bankruptcy Code.

8. To the extent the Application or the Roy Declaration is inconsistent with this Order, the terms of this Order shall govern.

9. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

10. This Court has and shall retain exclusive jurisdiction to hear and determine all matters arising from the implementation, interpretation, or enforcement of this Order.

EXHIBIT B

Declaration of J. Casey Roy

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	Chapter 11
	§	
WHITE ROCK MEDICAL CENTER, LLC, et al.,	§	Case No. 26-90115 (ARP)
	§	
Debtors.¹	§	Jointly Administered
	§	

**DECLARATION OF J. CASEY ROY IN SUPPORT OF THE
APPLICATION FOR ENTRY OF AN ORDER AUTHORIZING
THE EMPLOYMENT AND RETENTION OF KANE RUSSELL
COLEMAN LOGAN PC AS COUNSEL TO SUSAN N. GOODMAN,
PATIENT CARE OMBUDSMAN, EFFECTIVE AS OF FEBRUARY 20, 2026**

I, J. Casey Roy, state and declare under penalty of perjury that the following is true and correct to the best of my knowledge and belief:

1. I am a Senior Attorney with the firm of Kane Russell Coleman Logan PC (“KRCL”). I will be the only KRCL attorney working on these Bankruptcy Cases, subject only to rare exception when I am not available or the Patient Care Ombudsman (the “Ombudsman”) makes a specific request. I am a member in good standing with the State Bar of Texas. There are no disciplinary proceedings pending against me. Except as otherwise noted, I have personal knowledge of the matters set forth in this declaration (the “Declaration”).

2. I submit this Declaration in support of the *Application for Entry of an Order Authorizing the Employment and Retention of Kane Russell Coleman Logan PC as Counsel to Kane Russell Coleman Logan PC as Counsel to Susan N. Goodman, Patient Care Ombudsman, Effective as of February 20, 2026* (the “Application”). By the Application, the Ombudsman seeks

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to employ and retain KRCL as her counsel. In connection with the proposed representation, KRCL anticipates rendering the legal services outlined as the “Scope of Services” as set forth in the Application in connection with these Bankruptcy Cases.

3. As set forth in the Application, KRCL attorneys, myself included, are competent and have the skill and experience to represent the Ombudsman and address the issues that may arise in these Bankruptcy Cases.

KRCL’s Conflicts and Connections Review

4. In connection with preparing the Application and this Declaration, KRCL submitted into its computerized conflicts database (the “Database”) the names of the Debtors and of the parties listed on **Schedule 1** hereto (the “Parties-in-Interest”). KRCL maintains and updates its conflicts database in the regular course of its business. The Database includes information for every matter on which KRCL is now or has been engaged, the person or entity for which KRCL is now or has been engaged, and the identity of related parties and adverse parties. KRCL attorneys use the Database to search for conflicts for each Firm engagement and, as such, the Database is continually updated.

5. The Parties-in-Interest information was inputted into the Database, which resulted in a list of potential conflicts and connections. I used this information to contact each attorney at KRCL who was listed in the Database as having connections to the person or entity that might be related to these Bankruptcy Cases. This information allowed me to gather information and guidance with respect to the particular connections reflected.

6. KRCL attorneys appear in cases, proceedings, and out-of-court negotiations and mediations involving many different attorneys and non-attorney professionals, some of which may now or in the future represent creditors or Parties-in-Interest in these Bankruptcy Cases. In addition,

KRCL attorneys, in other cases, have appeared in the courtrooms of each of the sitting bankruptcy judges for the Southern District of Texas.

7. Subject to the disclosures set forth hereto on Schedule 2, to the best of my knowledge, information, and belief, based on the Firm Disclosure Procedures, KRCL does not have any “connection” to the Parties in Interest except as set forth below, otherwise in this declaration, or on Schedule 2 hereto.

8. Although KRCL has represented, currently represents, and may continue to represent certain entities and individuals listed on Schedule 2 hereto, KRCL will not represent any such entity or individual in the Chapter 11 Case. Should any conflict arise between KRCL, the Ombudsman, the Debtors, any creditor, or other Party-in-Interest during the pendency of these Bankruptcy Cases, KRCL will notify the Ombudsman.

9. Despite the efforts described above to identify and disclose KRCL’s connections with parties in interest in the Chapter 11 Case and despite KRCL’s good faith efforts, KRCL is unable to state with absolute certainty that every client representation or other connection has in fact been disclosed. To the extent any information herein requires amendment, modification or additional disclosures, upon KRCL’s further review, or in the event additional information becomes available, a supplemental declaration will be submitted to the Court reflecting such amendments, modifications, or disclosures.

10. I believe the connections disclosed on Schedule 2 and herein have not and will not affect KRCL’s representation of the Ombudsman in the Chapter 11 Case. KRCL does not currently represent such parties on any issue relating to the Debtors.

11. I am not related to and, to the best of my knowledge, no other attorney at KRCL is related to (a) any United States Bankruptcy Court Judge for the Southern District of Texas or

(b) the United States Trustee for the Southern District of Texas or any person employed by the Office of such United States Trustee.

12. To the best of my knowledge, information, and belief formed after reasonable inquiry, KRCL is a “disinterested person” as that term is defined in section 101(14) of the Bankruptcy Code and as used in section 328(c) of the Bankruptcy Code, and KRCL:

- a. is not a creditor, equity security holder, or insider of the Debtor;
- b. is not and was not, within two (2) years before the date of the filing of the petition, a director, officer, or employee of the Debtor; and
- c. does not have an interest materially adverse to the interest of the estate or of any class of creditors or equity security holders, by reason of any direct or indirect relationship to, connection with, or interest in, the Debtor, or for any other reason.

13. Based on the foregoing and except as provided herein, to the best of my knowledge, information, and belief formed after reasonable inquiry, neither KRCL nor any director or associate thereof has an interest materially adverse to the interests of the Debtor’s estate or any class of creditors or equity holders of the Debtor.

14. While the search of KRCL’s Database has been diligent, it is possible that there are other entities which KRCL may have represented but whose names have not been provided to KRCL. In addition, certain creditor and Party-in-Interest information may have changed without KRCL’s knowledge and may change during the pendency of these Bankruptcy Cases. KRCL will, on an ongoing basis, review its files during the pendency of these Bankruptcy Cases to ensure that no conflicts or other disqualifying circumstances exist or arise. If any new or relevant facts or relationships are discovered or arise, KRCL will use reasonable efforts to identify such further developments and will promptly file a supplemental declaration as required by Bankruptcy Rule 2014(a).

KRCL's Compensation

15. KRCL intends to apply for compensation for professional services rendered on an hourly basis and reimbursement of expenses incurred in connection with these Bankruptcy Cases, subject to the Court's approval and in compliance with the applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and any other applicable procedures and orders of the Court.

16. Subject to the Court's approval under Bankruptcy Code section 330(a), compensation will be payable to KRCL at its normal hourly billing rates, plus reimbursement of actual, necessary expenses and other charges incurred by KRCL, from funds of the Debtors' estate. The current billing rate ranges of KRCL attorneys are as follows:

Title	Rates
Directors	\$400-\$1,025
Senior Attorneys	\$535-\$715
Associates	\$320-\$580
Paraprofessionals	\$135-\$355

17. My current billing rate is \$715 per hour. The Firm has agreed to provide the Ombudsman with notice prior to any professional whose hourly rate is higher than \$715 providing services to the Ombudsman.

18. In addition, KRCL may engage in the services of one or more paraprofessionals as the need arises, whose rates will be \$135 to \$355 per hour. The hourly rates are subject to periodic adjustment, which customarily occurs at the beginning of each calendar year.

19. KRCL's hourly rates are set at a level designed to fairly compensate KRCL for the work of its attorneys and paralegals and to cover fixed and routine expenses. It is KRCL's policy to charge its clients in all areas of practice for all expenses incurred in connection with the client's case. The expenses charged to clients may include, without limitation, mail and express mail

charges, special or hand delivery charges, travel expenses, and expenses for computerized research.

20. The Ombudsman understands that KRCL intends to apply to this Court for allowance of compensation and reimbursement of expenses in accordance with applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and orders of this Court.

21. KRCL has no agreement with any other entity to share with such entity any compensation received by KRCL in connection with these Bankruptcy Cases. KRCL further states, pursuant to Bankruptcy Code section 329 and Bankruptcy Rule 2016(b), that it has not shared, nor agreed to share: (a) any compensation it has received or may receive with another party or person, other than with the shareholders, directors, counsel and associates of KRCL; or (b) any compensation another person or party has received or may receive.

22. To the best of my knowledge, the standard for the appointment of counsel for the Ombudsman has been met in this instance and KRCL is fully capable of fulfilling its duties to the Ombudsman.

23. To the extent that KRCL subsequently discovers any facts bearing on this Declaration, this Declaration will be supplemented and those facts will be disclosed to the Court at the earliest opportunity.

Statement Regarding U.S. Trustee Guidelines

24. KRCL intends to make a reasonable effort to comply with the U.S. Trustee's requests for information and disclosures both in connection with the Application and the interim and final fee applications the firm will file in the course of its engagement. KRCL reserves all

rights as to the relevance and substantive legal effect of the Appendix B Guidelines in the Chapter 11 Case.

25. KRCL provides the following response to the request for information set forth in Paragraph D.1. of the Appendix B Guidelines.

Question: Did you agree to any variations from, or alternatives to, your standard or customary billing arrangements for this engagement?

Response: No.

Question: Do any of the professionals included in this engagement vary their rate based on the geographic location of the bankruptcy case?

Response: No.

Question: If you represented the client in the 12 months prepetition, disclose your billing rates and material financial terms for the prepetition engagement, including any adjustments during the 12 months prepetition. If your billing rates and material financial terms have changed postpetition, explain the difference and the reasons for the difference.

Response: In the past 12 months, KRCL has represented the Ombudsman in the following matters: *In re Genesis Healthcare, Inc., et al.*, Case No. 25-80185 (SGJ) in the United States Bankruptcy Court for the Northern District of Texas, Dallas Division; and *In re Steward Health Care System LLC, et al.*, Case No. 24-90213 (CML) and *In re Wellpath Holdings, Inc., et al.*, Case No. 24-90533 (ARP), both in the United States Bankruptcy Court for the Southern District of Texas, Houston Division. In each case, KRCL applied for allowance of compensation and reimbursement of expenses in accordance with the applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the applicable Local Rules, and any further Court orders. KRCL's billing rates for these engagements ranged from \$600 to \$650 per hour for Mr. Roy's services in 2025. Pursuant to adjustments made to KRCL's hourly rates at the beginning of each fiscal year, Mr. Roy's 2026 hourly rate is \$715.

Question: Has your client approved your prospective budget and staffing plan, and, if so, for what budget period?

Response: KRCL expects to work together with the Ombudsman to develop a budget and staffing plan for the Chapter 11 Case.

26. Pursuant to 28 U.S.C. § 1746(2), I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: March 23, 2026

/s/ J. Casey Roy
J. Casey Roy

SCHEDULE 1

Potential Parties in Interest

Judges for Southern District of Texas

Honorable Chief Judge Eduardo V. Rodriguez
Honorable Judge Marvin Isgur
Honorable Judge Christopher M. Lopez
Honorable Judge Jeffrey P. Norman
Honorable Judge Alfredo Perez

**Office of UST for
Southern District of Texas**

Millie Aponte Sall
Alicia Barcomb
Alethea Caluza
Ana Castro
Jeannie Chavez
Tracey Conrad
Hector Duran
Ivette Gerhard
Brian Henault
Luci Johnson-Davis
Zilde Martinez
Elizabeth Miller
Linda Motton
Ha Nguyen
Glenn Otto
Tyler Laws
Vriana Portillo
Mario Rios
Yasmine Rivera
Jayson B. Ruff
Rosario Saldana
Patricia Schmidt
Christy Simmons
Gwen Smith
Christopher R. Travis
Clarissa Waxton
Jana Whitworth

Debtors

NCP Management, LLC
North Houston Surgical Hospital, LLC
National Payroll Services LLC
City Hospital Physician Group
Heights Healthcare of Texas, LLC
Heights Healthcare of Houston, LLC
Ashland Healthcare, LLC

Non-Debtor Affiliates

NCP Management, LLC
NCP Properties LLC
PH SPE LLC
Mirza Baig
Nexus Capital Partners Real Estate
Investments LLC
NCP Properties LLC

Debtors' Professionals

Reed Smith
Harney Partners
Epiq

Banks & UCC Liens

Amegy Bank
JPMorgan Chase Bank, N.A.
Stellar Bank
Wells Fargo, N.A.

Utility Providers

Direct Energy
Dallas Water Utility
Dallas Water Utility
Atmos
Spectrum
Vonage
Republic
Comcast
Datavox

Current D&O

Mirza N Baig
Rashid Syed

**Employee Benefit Providers, Payroll &
Staffing Agency**

Paylocity Corporation
Paylocity Holding Corporation
Health Care Services Corporation
Blue Cross Blue Shield of Texas
Dearborn Group, Inc. d/b/a Dearborn National
Life Insurance Company
Eyemed Vision Care, LLC
Human Interest, Inc.

Insurance

Zurich Insurance Company
Travelers Excess & Surplus Lines
Lexington Insurance Company
Positive Physicians Insurance Company
Professional Security Insurance Company

Litigation Parties

427 W 20th, LLC
4Web Inc.
9330 Poppy Dr LLC
9330 Poppy Dr LLC
AAP Implants Inc.
Adam Newman et al.
Agape Anesthesia CRNA, PLLC
Air Texas Mechanical, LLC
Alexis Debardeleben
Always Reliable Medical Staffing
Amergis Healthcare / Surgical Direct / Maxim
Staffing
American Express
AN Wrangler
Andrew's Sleepy Services, PLLC
Apollo Endosurgery
ARTHREX
Aspen Surgical Products
Asset Surplus Reallocation LLC d/b/a
SurgiShop
Assure Neuromonitoring
Axis Portable Air LLC
Bajae GS Healthcare Management
BeaconMedaes
Bio-Medical Applications (Fresinus)
Bio-Medical Applications of Texas, Inc.
Biopro Inc
Biotronik
Bioventus LLC
Bone Bank
Bridgestone MUD
California Healthcare Insurance Company,
Inc.
CardinalHealth, Inc.
CDF Textile, Ltd.
Centinel Spine LLC
Certified Languages International
Chemaqua Inc.

Cigna Health and Life Insurance Company
and/or affiliated Cigna entities
City of Houston
CLS Heights, LLC
CLS Heights, LLC / CLS Health, PLLC
Comflow Company, LLC
Concept Healthcare Partners
CONMED LIVATEC CORP
Constellation NewEnergy, Inc.
Corevant Health Partners
Cummins Southern Plains LLC
Dallas County
Dallas County Hospital District
Dallas Janitorial Services
Dana Grellhesl MD
Darlene A. Riley-Harris
Dawn Craig
Degen Medical Inc.
Department of Treasury
Digestive Health Associates of Texas, P.A.
Direct Energy Business, LLC
Dobbs Medical Sales
Dr. Sun Wright
Dr. Terry Gemas
Dr. Xuan Langridge
Dreamtrip LLC
Dynamic Access / Dynamic Infusion
Dynamic Systems, Inc
Elevated/Oracle Elevator
Eligibility Advocates, LLC
Emmanuel Falaude
Empire Today, LLC
Energy Mechanical Services, Inc.
Erazo Realty, LP
ERN Enterprises, Inc.
Euler Hermes North America Insurance
Company
EverBank N.A.
Excellence Medical Group, LLC
Executive Consulting Group, LLC
Fairway Bound LLC
Felisha Swanks
Financial Corporation of America, and Revco
Solutions Inc
FinThrive Revenue Systems, LLC
First Ins Fund/1st PIF

First-Citizens Bank & Trust Company
Francis B. Falbey Jr., MD
Friedman & Feiger, LLP
Gjerset & Lorenz LLP
Global Anesthesia Services, P.A.
Global Hawk Resources (Bonesupport Inc.)
Harris County
HCL Mechanical Services, LLC
Healogics, LLC
Healthcare Network of Texas Inc.
Healthcare Network Texas Republic Health
Corporation Of Rockwall County
HealthStream, Inc.
Herrick/Herrick
HHS Facilities Management, LLC
HPIC
IDR Healthcare, LLC
Imedical Inc.
Impact Advisors
Innovasis Inc.
iTech Monitoring
Johnson & Johnson Health Care Systems Inc.
Johnson Controls Fire Protection LP
Joint Restoration
Kareo Inc.
KCI USA INC.
Kelechi Ekejiuba Anesthologist
Laboratory Corporation
LaTosha Washington
Laura A. Hernandez
LDF Construction
Light CT Solutions
Lima East Anesthesia Associates, PLLC
Manhattan Telecommunications
Maria Flores et al.
Martinez and Fisher (Moorish Consular Court
- Sovereign Citizen)
Massey Services Inc
Medsource Surgical Solutions
Merit Radiology LLC
Microbiology Specialists Incorporated
Mindsight Medical-Houston
Minerva Surgical
Muin Haswah
Nancy Vaughn
Nanix LLC
NeoBeginnings, PLLC
Neuromonitoring Associates
Nevro Corp
Nicholas Suraci MD PLLC
North Texas Therapy Partners, LLC
Northeast Anesthesia Associates
Ogletree Deakins
OINT Holdings, Inc
Orthofix US LLC
OsteoMeds
OsteoRemedies, LLC
Otis Elevator Company
Palm Harbor Medical
Pointe Medical Consultants
Power Plus
Precision Cardiovascular Diagnostics
Premia Spine Inc.
Providence Medical Technology, Inc.
Radiation Detection Company
Reem Husein, MD
REILS Finance SPV
Rick Ngo, M.D.
Ring Central
RMI (via Commercial Collections Account
Specialist)
Rod A. Henderson
Romero, A
Ryder Truck Rental Inc
Scott Hansel
Seaspine Sales LLC
Shiela Foster
SI Bone
Singleton Associates, PA
Skeletal Dynamics. Inc.
SLR Medical Consulting, LLC
Solventum Health Information Systems, Inc.
Spinal Elements, Inc.
Spine Wave, Inc.
Spineart, Ventris and Future Surgical
Spring Surgical Hospital Partners, LLC
SRC Hospital Investments I, LLC
Star MD of Arlington, PLLC
Stewardship Officer Services, LLC
Stoll
Surgical Resources Group LLC
Synchronicity Health (NurseDash)

Talla Ngankeu LLC and Foundations Holdings, LLC
Taylor Communications, Inc
Terry Fokas
Terumo Americas Holding Inc
Texas Mutual Insurance Company
Thaxton Leadership, LLC
The Bancorp Bank, N.A.
The County Of Denton, Texas
The Huntington National Bank
Tissue Transplant Technology, LTD
T-Mobile
Total Scope, Inc.
Travelers Casualty and Insurance Company of America
Travelers Lloyd Insurance
Treace Medical Concepts, Inc.
TXU Energy Retail Company LP
ULINE
Universal Protection Service LLC
UPS
US Med-Equip, Inc
US Spinal Supply, LLC
Valley Medical Staffing, Inc.
Veradigm (fka Allscripts)
Versacor Enterprises, LLC
Vertos Medical Inc.
Village Emergency Room LLC
Vital Emergency Partners
Vituro Health, LLC
VMG Holdings LLC
Wells/Kellum Litigation
West Coast Medical
Wilkins Linen & Dust Control Service
XoBiologix LLC / Genesys Orthopedics
XS Supply, LLC
Xtant Medical Inc.
Xuan Langridge
ZRG Partners

Government Agencies

BioTel EMS System
Center for Improvement in Healthcare Quality
Centers for Medicare & Medicaid Services
North Central Texas Trauma Regional Advisory Council

Novitas Solutions, Inc.
Texas Department of State Health Services
Texas Health and Human Services Commission
Texas Medicaid & Healthcare Partnership
City of Dallas
City of Houston
Dallas Central Appraisal District (DCAD)
Harris County
Parkland Hospital District / Dallas County Hospital District
Texas Comptroller of Public Accounts
Texas Workforce Commission (TWC)
BioTel EMS System

Vendors

Abbott Laboratories Inc.
The Haven Texas LLC
WRIGHT MEDICAL TECHNOLOGY
MEDTRONIC USA INC
Strategic Solutions, LLC
SMITH & NEPHEW INC
SLR Medical Consulting, LLC
Optima Healthcare Insurance Services
Evident
Genesys Spine
Constellation NewEnergy Inc
R1 RCM Holding Inc
Stryker Flex Financial
SPINEART USA INC
RSI Technologies LLC
STRYKER ORTHOPAEDICS
Mckesson Medical Surgical
BECKMAN COULTER INC
Blue Cross Blue Shield
ARTHREX INC
Advanced Sterilization Products Services, Inc.
MEDLINE INDUSTRIES INC
Huntington
STERICYCLE
PALM HARBOR MEDICAL INC
Texas Mutual Workers Compensation Insurance
Pasha Law PC
HCL Mechanical Services, LLC
AIRGAS USA LLC

DEARBORN LIFE INSURANCE
COMPANY
Gulf Coast Regional Blood
T-System Inc
K&L Gates LLP
Zimmer Biomet
GMR EAST DALLAS LAND LLC
MEDSOURCE SURGICAL SOLUTIONS
TELEFLEX LLC
STRYKER SALES LLC
Comflow Mechanical Services
Magdou Health LLC
SKELETAL DYNAMICS, LLC
AM Infoweb Pvt. Ltd.
ACUMED LLC
RevMedRx Inc
Covidien Sales LLC
HOLOGIC INC/MA
MEDARTIS. INC.
HRSS
Sterling Initiatives
INSIGHT HEALTH CORP
Providence Medical Technology
Healthcare Financial Services
Xtant Medical
Stryker Spine
ACADIAN AMBULANCE SVC INC
Parks Coffee
Highridge Medical, LLC f/k/a Zimmer Biomet
Spine, Inc
INTEGRA LIFESCIENCES SALES LLC
Maverick Staffing
KPP II, LLC
Freedom Bio Medical LLC
Siemens Financial Services, Inc.
Corevant Health Partners LLC
Abbott Rapid Diagnostics Informatics Inc
ShiftKey, LLC.
Dr. Reem Husein
AVAYA
Arthur J. Gallagher Risk Management
DIGESTIVE HEALTH ASSOC OF TX PA
Neuromonitoring Associates
Chasewood Crossing LP
Spring Staffing Services LLC
CARDINAL HEALTH
Ventris Medical LLC
KLS-Martin L.P.
Bioventus LLC
ECG Management Consultants
JOHNSON & JOHNSON HEALTH
Premia Spine Inc.
National Neuromonitoring Services LLC
APPLIED MEDICAL
Pointe Medical Consultants LLC
Northeast Texas Co. Inc
Cordis US Corp
STRYKER ENDOSCOPY
No SWEAT Mechanical, LLC
Johnson Controls Fire Protection LLC
Axogen Inc
Pipeline Health
Tornier, Inc.
EMS TODAY LLC
Francis B. Falbey JR
iTech Monitoring, Inc.
Prince Food Systems Inc
Triyam Inc
QUEST DIAGNOSTICS
ATMOS ENERGY
REPUBLIC SVCS INC
Lifeline Renal Care LLC
AMERISOURCE BERGEN DRUG CORP
ALSCO
DFW Mechanical Group
STERIS CORP / INSTRUMENT
Zurich
BIOMERIEUX INC
OTIS ELEVATOR COMPANY
Strateq Health
CONTINUANT INC
Turquoise Health
Linde Gas & Equipment
LIFENET HEALTH
SURGICAL PRODUCT SOLUTIONS LLC
Arthur Lawrence FAO LLC
OLYMPUS AMERICA INC
Henry Schein Medical
HICKS PATE STRATEGIES LLC

SCHEDULE 2**Connections to Parties-in-Interest**

Party-in-Interest	Nature of Relationship with Debtors	Nature of Connection with KRCL
Huntington National Bank	Litigation Party; Secured Creditor	KRCL represents this entity in unrelated matters.
Charter Communications f/k/a Time Warner Cable a/k/a Spectrum	Utility Provider	KRCL represents this entity in unrelated matters

Other Connections

KRCL attorney Casey Roy represented the Patient Care Ombudsman in *In re Steward Health Care System LLC, et al.*, Case No. 24-90213 (Jointly Administered), pending in the United States Bankruptcy Court for the Southern District of Texas, a matter unrelated to these Chapter 11 Cases.

KRCL attorney Casey Roy represented the Patient Care Ombudsman in *In Wellpath Holdings, Inc., et al.*, Case No. 24-90533 (ARP) (Jointly Administered), pending in the United States Bankruptcy Court for the Southern District of Texas, a matter unrelated to these Chapter 11 Cases.

KRCL attorney Casey Roy represented the Patient Care Ombudsman in *In re Caremax, Inc., et al.*, Case No. 24-80093 (MVL), pending in the United States Bankruptcy Court for the Northern District of Texas, Dallas Division, a matter unrelated to these Chapter 11 Cases.

KRCL attorney Casey Roy currently represents the Patient Care Ombudsman in *In re Genesis Healthcare, Inc., et al.*, Case No. 25-80185 (SGJ), pending in the United States Bankruptcy Court for the Northern District of Texas, Dallas Division, a matter unrelated to these Chapter 11 Cases.

From May 2021 to March 2024, KRCL attorney Casey Roy served as a Trial Attorney with the Office of the United States Trustee for Region 7. Mr. Roy is no longer involved in any case in which he represented the United States Trustee, and such cases are unrelated to the Debtors.