

Susan N. Goodman
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Patient Care Ombudsman

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

<p>In re:</p> <p>GENESIS HEALTHCARE, INC., et al.,¹</p> <p style="padding-left: 40px;"><i>Debtors-in-Possession.</i></p>	§ § § § § §	<p>Case No. 25-80185-SGJ-11</p> <p>(Jointly Administered)</p> <p>Chapter 11</p>
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**PATIENT CARE OMBUDSMAN
EIGHTH MONTHLY FEE STATEMENT COVER SHEET**

Applicant/Capacity:	Susan N. Goodman/ Patient Care Ombudsman
Time Period:	March 1, 2026 – March 31, 2026
Bankruptcy Petition Date:	July 9, 2025
Date PCO Appointment:	August 15, 2025 [Docket No. 435]
Amount Accrued:	\$16,610.00 (\$16,610.00 fees; \$0.00 expenses)
Amount Requested:	\$13,288.00 (\$13,288.00 fees; \$0.00 expenses)
Amount Previously Paid:	\$433,409.17
Amount in Trust:	\$0.00
Amount Unpaid and Requested:	\$0.00
Expense Detail:	Car Rental \$0.00; Hotel \$0.00; Meals \$0.00; Parking Fees/Tolls \$0.00; Postage \$0.00
Retainer:	None
Hourly Rates:	\$550.00/hour
Hours This Application:	30.6 total/30.2 billed
Activity Classification:	General Case Administration hours 28.7; Travel 0.00; and 1.9 Fees (preparation of this statement not included)

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 Debtors may be obtained on the website of the Debtors’ claims and noticing agent at <https://dm.epiq11.com/Genesis>. The Debtors’ corporate headquarters and service address is 101 East State Street, Kennett Square, PA 19348.

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Patient Care Ombudsman
NM, WV, WA & CA

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

In re:	§	Case No. 25-80185-SGJ-11
GENESIS HEALTHCARE, INC., et al., ²	§	(Jointly Administered)
<i>Debtors-in-Possession.</i>	§	Chapter 11

EIGHTH MONTHLY FEE STATEMENT OF SUSAN N. GOODMAN FOR
COMPENSATION AND REIMBURSEMENT OF EXPENSES AS PATIENT CARE
OMBUDSMAN FOR PERIOD MARCH 1, 2026, THROUGH MARCH 31, 2026

IN ACCORDANCE WITH *ORDER (I) ESTABLISHING PROCEDURES FOR INTERIM COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR RETAINED PROFESSIONALS AND (II) GRANTING RELATED RELIEF* [DOCKET 688], EACH PARTY RECEIVING NOTICE OF THIS MONTHLY FEE STATEMENT WILL HAVE UNTIL 4:00 PM CST, 14 DAYS AFTER SERVICE OF THE MONTHLY FEE STATEMENT TO OBJECT TO THE REQUESTED FEES AND EXPENSES. UPON THE EXPIRATION OF THE 14-DAY PERIOD, THE DEBTORS ARE AUTHORIZED TO PAY THE PROFESSIONAL AN AMOUNT OF 80% OF THE FEES AND 100% OF THE EXPENSES REQUESTED IN THE APPLICABLE MONTHLY FEE STATEMENT.

1. Pursuant to sections 105(a), 330, and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Bankruptcy Local Rules for the Northern District of Texas, including Appendix F therein (the “Local Bankruptcy Rules”), and the court’s August 28, 2025, *Order (I)*

² 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 Debtors may be obtained on the website of the Debtors’ claims and noticing agent at <https://dm.epiq11.com/Genesis>. The Debtors’ corporate headquarters and service address is 101 East State Street, Kennett Square, PA 19348.

Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals and (II) Granting Related Relief (the “Interim Compensation Order”) [Docket No. 688], Susan N. Goodman, through Pivot Health Law, LLC, patient care ombudsman (“PCO”) for Debtors’ locations in California, Washington, New Mexico, and West Virginia, hereby files this EIGHTH MONTHLY FEE STATEMENT (the “Statement”) for (a) compensation in the amount of 80% of \$16,610.00 in fees - **\$13,288.00** - for reasonable and necessary services on behalf of Debtors’ patients and residents during the period of March 1, 2026, through and including March 31, 2026 (the “Statement Period”) and (b) reimbursement in the amount of **\$0.00** for 100% of the actual and necessary expenses that PCO incurred during the Statement Period. Collectively, these amounts total **\$13,288.00** and are referred to as the “Monthly Statement Award.”

BACKGROUND

2. On July 9, 2025 (the "Petition Date"), each of the Debtors in this action filed voluntary petitions for relief under Chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the Northern District of Texas, Dallas Division (the "Court"). The cases are jointly administered under Case No. 25-80185.

3. The Debtors continue to operate and manage their businesses as debtors in possession pursuant to Bankruptcy Code sections 1107(a) and 1108. No trustee or examiner has been appointed.

4. On July 23, 2025, the Court entered its *Order Directing Appointment of One or More Patient Care Ombudsmen Under 11 U.S.C. § 333 and Fed. R. Bankr. P. 2007.2* (the “PCO Order”) at Docket No. 187.

5. In response, on August 15, 2025, the United States Trustee’s Office filed its *Notice of Appointment of Susan Goodman Patient Care Ombudsman Under 11 U.S.C. § 333* (the “Appointment Notice”) at Docket No. 435. The Applicant is one of three ombudsmen appointed in these jointly administered cases.

6. After the filing of the Appointment Notice, Debtors' counsel facilitated PCO's introduction to Debtors' executive leadership responsible for facility operations, who further facilitated introductions to market advisors for the states assigned to PCO (CA, WA, NM, and WV).

7. In this Statement Period, PCO engaged remote monitoring inclusive of survey and other document review, updates calls with operational leadership teams, and regional representatives.

8. PCO monitored and analyzed docket filings for issue spotting, calendaring, and responding at a level consistent with PCO's case role.

9. PCO spent a total of 30.2 hours engaged in the PCO role during the Statement Period. PCO's professional time included: 28.7 hours general case administration; 0.0 hours ½ half-rate non-working travel; and 1.9 hours associated with fee-related activities.

10. Time associated with the preparation of this Statement will be included in a future monthly statement and/or application.

11. The total sum due to PCO for professional services rendered on behalf of Debtors' patients/residents is 80% of \$16,610.00 in fees (\$13,288.00) and \$0.00 in actual necessary expenses, equaling a Statement Award of **\$13,288.00**.

12. In support of this Application, PCO submits fee summaries and detailed invoices attached herein as Exhibits B and C.

RESERVATION OF RIGHTS

13. This Statement includes all the fees and expenses for the Statement Period, as well as the required information and supporting detail related thereto, available to PCO at the time of the filing of the Statement. If additional fees, expenses, or required information or supporting detail in connection with this Statement Period should subsequently become available, as a result of delays in accounting processing, an inadvertence with respect to time entered into the accounting system, or any other reason, PCO reserves the right to payment of such affected amounts (including the right to seek payment thereof in a manner consistent with the Interim Compensation Order).

NOTICE

14. In accordance with the procedures and definitions set forth in the Interim Compensation Order, notice of this Statement will be served by first-class mail or by electronic transmission upon the Notice Parties. A copy of this Statement will also be made available on the Debtors' case information website located at <https://dm.epiq11.com/case/genesis/dockets>. Based on the foregoing, PCO submits that no other or further notice is required.

DATED: April 20, 2026.

By: /s/ Susan N. Goodman
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Patient Care Ombudsman for CA, WA, NM & WV

**EXHIBIT A
 CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing pleading was served upon the parties via the Court's electronic transmission facilities, on this 20th day of April 2026 with a copy sent by email to:

<p>Genesis Healthcare, Inc. c/o Ankura Consulting Group, LLC 2021 McKinney Ave, Ste 340 Dallas, TX 75201 Louis E. Robichaux, IV louis.robichaux@ankura.com Russell A. Perry russell.perry@ankura.com <i>Debtors' Consultants</i></p>	<p>McDermott Will & Schulte LLP 2801 N Harwood Street, Ste 2600 Dallas, TX 75201 Marcus A. Helt mhelt@mwe.com Jack G. Haake jhaake@mwe.com <i>Debtors' Counsel</i></p>
<p>McDermott Will & Schulte LLP 1180 Peachtree St. NE, Ste 3350 Atlanta, GA 30309 Daniel M. Simon dsimon@mwe.com <i>Debtors' Counsel</i></p>	<p>McDermott Will & Schulte LLP 444 West Lake Street, Ste 4000 Chicago, IL 60606 William A. Guerrieri wguerrieri@mwe.com Emily C. Keil ekeil@mwe.com <i>Debtors' Counsel</i></p>

<p>Ferguson Braswell Fraser Kubasta PC 2500 Dallas Pkwy, Ste 600 Plano, TX 75093 Leighton Aiken laiken@fbfk.law <i>OHI Mezz Lender LLC Counsel</i></p>	<p>Goodwin Proctor LLP The New York Times Bldg., 620 Eighth Ave. New York NY 10018 Robert J. Lemons rlemons@goodwinlaw.com <i>OHI Mezz Lender LLC Counsel</i></p>
<p>Gibson Dunn & Crutcher LLP 333 South Grand Ave. Los Angeles, CA 90071 Jeffrey C. Krause jkrause@gibsondunn.com Francis Petrie fpetrie@gibsondunn.com Michael G. Farag mfarag@gibsondunn.com <i>Markglen LLC Counsel</i></p>	<p>DLA Piper LLP 1900 N. Pearl St., Ste 2200 Dallas, TX 75201 James Muenker james.muenker@us.dlapiper.com <i>CPE 88988 Counsel</i></p>
<p>The Office of the United States Trustee, Region 6 1100 Commerce Street, Room 976 Dallas, TX 75242 Meredyth Kippes meredyth.kippes@usdoj.gov <i>US Trustee Counsel</i></p>	<p>Stinson LLP 1201 Walnut, Ste 2900 Kansas City, MO 64106 Zachary Hemenway – zachary.hemenway@stinson.com Nicholas Zluticky – nicholas.zluticky@stinson.com <i>Co-counsel Statutory Unsecured Claimholders' Committee</i></p>
<p>Proskauer Rose LLP Eleven Times Square New York, NY 10036-8299 Brian Rosen – brosen@proskauer.com Ehud Barak – ebarak@proskauer.com Daniel Desatnik – d-desatnik@proskauer.com <i>Co-counsel Statutory Unsecured Claimholders' Committee</i></p>	<p>Proskauer Rose LLP Three First National Plaza, 70 W. Madison Chicago, IL 60602-4342 Paul V. Possinger – ppossinger@proskauer.com Jordan Sazant – jsazant@proskauer.com <i>Co-counsel Statutory Unsecured Claimholders' Committee</i></p>

/s/ Susan N. Goodman

Susan N. Goodman



EXHIBIT B
Fee Statement Summary

Case Name: Genesis Healthcare Inc.
Case No: 25-80185-sgj, jointly administered
03/01/2026 - 03/31/2026

Cumulative Totals to Date				
FEES BILLED	COSTS BILLED	HOLDBACK	FEES PAID	COSTS PAID
\$438,350.00	\$29,698.17	\$87,670.00	\$403,711.00	\$29,698.17

Date:	20-Apr-26	Objection Deadline:	4-May-26
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MO/YR	PROFESSIONAL	RATE/HR	HOURS BILLED	TOTAL	HOLDBACK	AMT DUE
Mar-26	SUSAN N. GOODMAN	\$550.00	30.2	\$16,610.00	\$3,322.00	\$13,288.00
	TOTAL FEES			\$16,610.00	\$3,322.00	\$13,288.00
	TOTAL COSTS			\$0.00	N/A	\$0.00
	AMOUNT DUE			\$16,610.00		\$13,288.00

Pivot Health Law, LLC

P.O. Box 69734
Oro Valley, AZ 85737

Invoice

Invoice #: 1370
Invoice Date: 4/20/2026

Period: March 1 - 31, 2026

Bill To:

Genesis HealthCare, Inc.
N.D. TX (Dallas) - 25-80185
jointly administered
File# 434120

Date	Description	Hours/Qty	Rate	Amount
3/1/2026	Look up missed call number to msg number; note a facility in NM but no VMX; EML leadership re same in case aware of concern (.1); review and analyze DE 2387 since facilities PCO monitors; concern surrounding PCO mentions in same; EML to PCO counsel re concern (.4)	0.5	550.00	275.00
3/2/2026	review DE 1388 with follow up assigned executive contact re mentioned BK departures in my coverage area (.2); additional follow up re Admin Departure NM re timing and reasons (.1); Draft reply to DE 2387 concerns re PCO role(1.9) EML to PCO counsel w/ return edits to review and revise (.4); call w/ PCO counsel re context of reply and possible concerns (.3); follow up ankura re outstanding mo fee and upcoming int fee (.1)	3	550.00	1,650.00
3/2/2026	Prepare Exhib B Feb 2026 - 0.5 (bill 0.3)	0.3	550.00	165.00
3/3/2026	EML f/u Marmet (2567 for CO survey) (.2); EMLs w/ Skies re survey findings and review (.2); EML and call re survey findings Everett (.3); EML and review of Ladera 2567 POC (.3); follow up Ladera leadership change (.1); update call anticipated new operator CEO (.3); update call Debtor counsel contact re continued laundry challenges and bait station service interruptions (.3);	1.7	550.00	935.00

Total

Payments/Credits

Balance Due

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Date	Description	Hours/Qty	Rate	Amount
3/3/2026	follow up EML MCA for NM with Real and Bloomfield data (.2); follow up EML Bloomfield asking for POC (.2); EMLs x3 exchg executive contact re departures re KERP (.2) and Everett Survey (.1); review and analyze Clovis Rehab 2567 (46 pg) (.9); follow up leadership re POC and QAPI request (.1); Review and analyze casa de oro 2567 (5); EML follow up NM MCA re information provided and still needed re survey activity updates (.1)	2.3	550.00	1,265.00
3/4/2026	Update call re departures NM market (.3); Review and analyze listing of ldrshp changes 3/3 [concluded not updated] (.2); EML asking for intro call Canterbury WV (.1); EML follow up Columbia Crest asking leaders updates re POC; maintenance hire; boilers (.2); EML Red Rocks Admin asking for intro follow up (.1); intro call with Red Rocks Admin (.7); EML with response Putnam leadership re staff, equip, and maint (.2); EML Teays asking for equip update (.1);	1.9	550.00	1,045.00
3/4/2026	Review and analyze leadership changes file dated 3/4/26 (.2); Prepare and file 7th mo fee stmt (1.1)	1.3	550.00	715.00
3/9/2026	follow up NHA Teays re laundry equip (.2);	0.2	550.00	110.00
3/10/2026	Prep and file CNO 2nd Int Fee (.3); additional follow up Salem NHA & Teays NHA re laundry equip impacts (.2); review and analyze Teays survey findings state/fed (43 pgs) (.6); EML follow up WV ldrshp re vermin findings and ask for proof services inside/out (.2); loop in exec contact (.1); review and analyze latest leadership changes (.4); follow up Canterbury NHA re initial meeting (.1)	1.9	550.00	1,045.00

Total

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Date	Description	Hours/Qty	Rate	Amount
3/10/2026	Update PCO counsel re current efforts (.2); Update UST re departures and time to sale close (.2)	0.4	550.00	220.00
3/12/2026	Follow up call Reg Comp WV re SFF updates; vermin concern; staff changes (.2)	0.2	550.00	110.00
3/15/2026	High level review DE 2443 KERP obj UST (.2)	0.2	550.00	110.00
3/16/2026	review and analyze EML attach re pest control info and respond concern re attachment availability (.4); review and analyze EML with leadership change attach for updates relative to coverage area (.3)	0.7	550.00	385.00
3/17/2026	Revised extern files; receive and download to confirm open with executive team (.1); back and forth exchange court re format of proposed order 2d Int fee (.5 NC); review DE 2454 for facility I monitor involvement (Charles Town) (.2) follow up Salem NHA re washer repair (.1)	0.4	550.00	220.00
3/18/2026	Prepare and finalize CNO 7th Mo Fee Stmt (.2)	0.2	550.00	110.00
3/20/2026	Begin review and analysis extermination data for WV (2.2); calls and follow-up rep for Brightwood re receipt differences (.3)	2.5	550.00	1,375.00
3/23/2026	review DE 2492 Debtor Agenda 3/24/26 (.1); call with PCO counsel re hrg attendance re KERP/KEIP (.1); review and analyze leadership updates with f/u request Sisterville DON re double coverage (.2); EML new Rosewood team requesting call for update (.1)	0.5	550.00	275.00
3/24/2026	TPC w/ DON Sisterville re transfer (.3); EML exchg Rosewood Admin re intro request and survey timing for follow-up (.1)	0.4	550.00	220.00

Total

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Date	Description	Hours/Qty	Rate	Amount
3/26/2026	Review 2567 and Pest Control file Teays with EML follow up DON/NHA (.4); Review Ansted Pest control with follow up questions to NHA that topic and updates (.3); Review pest control Brightwood with EML questions to NHA re same (.3); follow up EML exchange Ansted NHA re survey and staff updates (.2); EML DON Brightwood req call, QAPI, and survey updates (.1)	1.3	550.00	715.00
3/26/2026	Review updated CMS SFF data (.2); Review pest control cantebury (.2); missed 3/13 intro call with new NHA (.5); EML exchg Care Haven confirming POC and asking why change vendor pest control (.2); review canterbury SV notes and follow-up status questions staffing to DON (.3)	1.4	550.00	770.00
3/26/2026	Review 3/12 WV Reg Compl EML and 2567 updates (.4); review and analyze Cedar 2567 (20 pg) (.7) and pest control relative to now SFF (.3); follow up EML NHA and DON for follow up with QAPI request (.3); R&A Dunbar pest control relative to c/o survey and response (.5)	2.2	550.00	1,210.00
3/27/2026	EML follow up and call NHA Brightwood re pest control f/u to mice comment Dec 25 (.3);	0.3	550.00	165.00
3/30/2026	EML exchg Brightwood leadership re QAPI needs (and VMX) (.2); Call with Brightwood DON re same and update on ops (.7); EML follow up Canterbury NHA re QAPI (.1); Rev & Analyze Heritage QAPI (.7); follow up EML Heritage NHA re Feb QAPI and preferred process into with new DON (.2)	1.9	550.00	1,045.00

Total

Payments/Credits

Balance Due

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Date	Description	Hours/Qty	Rate	Amount
3/31/2026	Update call NM market 1/2 re survey activity and PCO priority follow up analysis (.4); location assessment of notes and data to date for site visit and call follow up (turnover; survey performance; hx of challenges; pest control tx) (.7); Rev & analyze Canterbury QAPI data x3 mo; (2.5) EML follow up leadership re additional questions (.2)	3.8	550.00	2,090.00
3/31/2026	Call with Bloomfield NHA after text to wrong NHA - building update (.2); Pine Lodge NHA reach out for call prior depart (.1); Updated leadership file - rev & analyze with DON NM follow up (.4)	0.7	550.00	385.00

Total \$16,610.00

Payments/Credits \$0.00

Balance Due \$16,610.00