The order below is hereby signed.

Signed: August 28, 2006.

S. Martin Teel, Jr.
United States Bankruptcy Judge

UNITED STATES BANKRUPTCY COURT
DISTRICT OF COLUMBIA

In re	:	
	:	Chapter 11
GREATER SOUTHEAST COMMUNITY HOSPITAL CORPORATION I, et al.,	:	Jointly Administered
	:	Case No. 02-2250
	:	Judge S. Martin Teel, Jr.
Debtors.	:	

JOINT STIPULATION AND ORDER

Upon consideration of the DCHC Liquidating Trust's (the "Trust") Motion For Order Requiring Kutak Rock LLP ("Kutak Rock") To Immediately Produce Debtors' Books And Records To The Trust, as supplemented to add Epstein, Becker & Green, PC ("Epstein Becker") (collectively, the "Motion"), the responsive papers filed by Kutak Rock and Epstein Becker, and supplementary papers and the hearings held on this matter on July 25, 2006 and August 17, 2006, it is hereby

ORDERED that the Court disposes of the issues as reflected by the Court's oral opinions, as follows;

ORDERED that Kutak Rock and Epstein Becker shall, make available for the Reorganized Debtors' inspection their respective Client Files (as defined herein) of the Debtors (as defined herein) in the Metropolitan Washington, D.C. area; and it is further

ORDERED that, for purposes of this Order, "Client Files" means all documents that fall within the "entire file" approach applicable in the District of Columbia and consistent with the Court's oral opinions; and it is further

ORDERED that, for purposes of this Order, "Debtors" refers to the debtors in this jointly-administered bankruptcy proceeding (i.e., Greater Southeast Community Hospital Corporation I, PACIN Healthcare-Hadley Memorial Hospital Corporation, Michael Reese Medical Center Corporation, Pacifica Hospital of the Valley Corporation, Pine Grove Hospital Corporation, and their ultimate parent, Doctors Community Healthcare Corporation), and their predecessors and does not refer to any other entities, including, but not limited to, Brea Community Hospital and Serra Medical Clinic; and it is further

ORDERED that, prior to September 8, 2006, and such later dates with respect to email files as stated herein, the Reorganized Debtors may inspect the Client Files of Kutak Rock and Epstein Becker on business days between 9:30 a.m. and 5:00 p.m. and identify (with reasonable specificity, including by Bates number) in writing to the Trust and Kutak Rock or Epstein Becker, as applicable, any documents that, in the view of the Reorganized Debtors, do not relate to Trust Claims or Distribution Assets within the meaning of the Liquidating Trust Agreement (including for the reason that they are documents from a time frame subsequent to the Effective

Date of the Plan), and request that Kutak Rock or Epstein Becker, as applicable, segregate those documents (the "Carve-Out Documents"); and it is further

ORDERED that, the Reorganized Debtors must give counsel for Kutak Rock and Epstein Becker at least one full business day advance notice prior to seeking access to the Client Files (i.e., if the Reorganized Debtors seek to inspect the Client Files at 9:30 a.m. on a Wednesday, they must contact the applicable counsel for Kutak Rock or Epstein Becker by at least 9:30 a.m. on the preceding Tuesday; if they seek to inspect the Client Files at 9:30 a.m. on a Monday, they must contact the applicable counsel for Kutak Rock or Epstein Becker by at least 9:30 a.m. on the preceding Friday); and it is further

ORDERED that, provided that the Carve-Out Documents in the possession of Kutak Rock or Epstein Becker do not exceed 1000 pages in length respectively, Kutak Rock & Epstein Becker shall submit copies of the Carve-Out Documents in their possession to the Court on or before September 19, 2006 (with respect to non-emails) and within 11 days or longer if agreed to by the Parties or by Court Order after the Reorganized Debtors review of Carve-Out emails, *in camera*, for the Court to determine whether such documents, or any of them, relate to Trust Claims or Distribution Assets; and it is further

ORDERED that in the event that the Carve-Out Documents in the possession of Kutak Rock or Epstein Becker exceed 1000 pages in length respectively, the Reorganized Debtors and the Trust shall confer on the most efficient means for seeking a determination by the Court of whether such documents, or any of them, relate to Trust Claims or Distribution Assets and, following such conferral, shall seek a phone conference among the Reorganized Debtors, the Trust, Kutak Rock, Epstein Becker and the Court regarding the matter to occur on or before

September 22, 2006 (with respect to non-emails) and, with respect to Carve-Out emails at a date or dates to be set by the Court; and it is further

ORDERED that, within 7 days of any *in camera* submission of the Carve-Out Documents, the Trust and the Reorganized Debtors may file written submissions with the Court concerning their rights as to the Carve-Out Documents; and it is further

ORDERED that, after the Reorganized Debtors have completed their inspection of the Client Files, Kutak Rock and Epstein Becker shall make their Client Files (except any Carve-Out Documents) available for inspection, copying or delivery to the Trust in the form (i.e., originals or copies) and manner that the Court directs by subsequent order; and it is further

ORDERED that, by August 31, 2006, Kutak Rock, Epstein Becker, and the Reorganized Debtors may file written responses to the Trust's supplemental briefing on the issues of (a) whether the Trust is entitled to original Client Files or copies thereof; and (b) which parties are responsible for the costs associated with reviewing, copying and/or delivery of Client Files to the Reorganized Debtors and the Trust, with any replies to be filed and served by September 8, 2006; and it is further

ORDERED that the term "Client Files" does not include indices created by Epstein Becker that merely reference a document's title, author, or date or indices created after the April 5, 2004 effective date of the Plan; *provided* that should any index or indices contain(s) additional information (such as attorney mental impressions or conclusions), Epstein Becker shall within 5 business days of this Order, file a statement with this Court describing the additional information and this Court shall determine whether it should be produced; *provided further*, solely to facilitate and expedite the Reorganized Debtors' inspection, Epstein Becker may provide such indices to the Reorganized Debtors; the provision of such indices is not, and shall not be

construed to be (i) a waiver or other relinquishment or diminution of any privilege or exemption from discovery or disclosure on the part of Epstein Becker, or (ii) an admission that such indices are part of Epstein Becker Client Files; Epstein Becker shall retain copies of all such indices for a period of at least one year; and it is further

ORDERED that Kutak Rock and Epstein Becker will search for and make available to the Reorganized Debtors initially (and then the Trust) email documents on a "rolling basis" as follows:

1. Epstein Becker shall first search and make available email files that are Client Files of David Tatge, Daly Temchine and Clifford Barnes, which production should be completed by September 1, 2006;

2. All remaining email files of Epstein Becker that are Client Files should be made available as soon as reasonably possible, but with an eye toward completion by September 15, 2006;

3. Kutak Rock shall first search and make available to the Reorganized Debtors initially (and then to the Trust) email files that are Client Files of Cynthia Sanders (a/k/a Cynthia Frey, Cynthia Sehr) and George Krauss, which should be completed by September 8, 2006; and

4. All remaining email files of Kutak Rock that are Client Files should be made available as soon as reasonably possible, but with an eye toward completion by September 29, 2006.

cc:

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Lucius B. Lau, Esq.
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Counsel to Epstein Becker & Green PC

BAE SYSTEMS

Bankruptcy Noticing Center
2525 Network Place, 3rd Floor
Herndon, Virginia 20171-3514

CERTIFICATE OF SERVICE

District/off: 0090-1 User: myers Page 1 of 1 Date Rcvd: Aug 28, 2006
Case: 02-02250 Form ID: pdf001 Total Served: 3

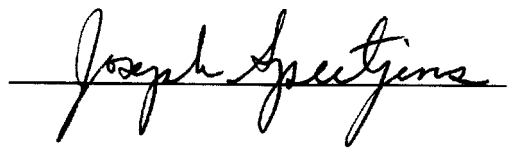
The following entities were served by first class mail on Aug 30, 2006.
aty Ted A. Berkowitz, Farrell Fritz, PC, EAB Plaza, Uniondale, NY 11556-0120
+Neil J. Dilloff, Esq, DLA Piper Rudnick Gray Cary US LLP, 6226 Smith Ave, Baltimore, MD 21209-3642
+Patrick Collins, Esq, Farrell Fritz, PC, 1320 Reckson Plaza, Uniondale, NY 11556-0120

The following entities were served by electronic transmission.
NONE. TOTAL: 0

***** BYPASSED RECIPIENTS *****
NONE. TOTAL: 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.
USPS regulations require that automation-compatible mail display the correct ZIP.

I, Joseph Speetjens, declare under the penalty of perjury that I have served the attached document on the above listed entities in the manner shown, and prepared the Certificate of Service and that it is true and correct to the best of my information and belief.

First Meeting of Creditor Notices only (Official Form 9): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Aug 30, 2006 **Signature:**