

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF COLUMBIA**

In re:	:	Chapter 11
	:	
GREATER SOUTHEAST COMMUNITY	:	Jointly Administered
HOSPITAL CORP., I, et al., ¹	:	Case No. 02-2250
	:	Judge S. Martin Teel, Jr.
Debtors.	:	

**SUBMISSION OF UNOPPOSED ORDER APPROVING
THE DCHC LIQUIDATING TRUST'S SEVENTEENTH OMNIBUS OBJECTION TO
CLAIMS PURSUANT TO 11 U.S.C. § 502 AND FED. R. BANKR. P. 3007:
LATE-FILED CLAIMS**

**TO THE HONORABLE S. MARTIN TEEL, JR.
UNITED STATES BANKRUPTCY JUDGE:**

The DCHC Liquidating Trust (the "Trust") hereby submits the attached proposed Order (the "Order") Approving the Trust's Seventeenth Omnibus Objection (the "Seventeenth Omnibus Objection") to Late-Filed Claims Pursuant to 11 U.S.C. § 502 and Fed. R. Bankr. P. 3007, which was not opposed by any party, and in support states as follows:

1. On July 7, 2008 the Trust filed with this Court the Seventeenth Omnibus Objection. The Seventeenth Omnibus Objection seeks to disallow and expunge the Subject Claims² on the basis that they are late filed.

¹ The affiliated debtors are PACIN-Hadley Memorial Hospital Corporation of Washington, D.C. ("Hadley"), Michael Reese Medical Center Corporation of Chicago, Illinois ("MR"), Pacifica Hospital of the Valley Corporation of Sun Valley, California ("Pacifica"), Pine Grove Hospital Corporation of Canoga Park, California ("Pine Grove") and their ultimate parent corporation, Doctors Community Hospital Corporation ("DCHC"; collectively with Greater Southeast Community Hospital Corporation I, Hadley, MR, Pacifica and Pine Grove, the "Debtors").

² All terms not defined herein shall have the meaning assigned to them in the Seventeenth Omnibus Objection.

2. The deadline to respond to the Seventeenth Omnibus Objection was August 6, 2008.

3. The Trust served the Seventeenth Omnibus Objection in accordance with the Certificate of Service attached to the Seventeenth Omnibus Objection. *See* Declaration of John Hoke, dated August 7, 2008 (the “Hoke Decl.”), attached hereto as Exhibit 1 at ¶ 4.

4. With respect to claimant Keith Cartwright (“Cartwright”), service of the Seventeenth Omnibus Objection was subsequently returned to the Trust by the United States Postal Service. *Hoke Decl.* at ¶ 5. The Trust attempted to search for an alternative address for Cartwright, but could not locate one. *Id.* at ¶ 6.

5. The Trust believes that service was properly performed on Cartwright on July 7, 2008. Therefore, Cartwright’s claim should be expunged in accordance with Exhibit A to the Seventeenth Omnibus Objection.

6. The Trust has received no opposition to the Seventeenth Omnibus Objection and none appear to have been filed with the Court. *Hoke Decl.* at ¶ 7.

7. In light of the fact that the Trust received no opposition to the Seventeenth Omnibus Objection and that all parties were properly served, and in an effort to minimize the Trust’s administrative expenses, the Trust requests that this Court approve the Order without further hearing. The Order previously submitted with the Seventeenth Omnibus Objection and Exhibit A to the Seventeenth Omnibus Objection detailing the Subject Claims are attached hereto as Exhibit 2 for the Court’s convenience.³

8. The Trust hereby reserves its right to object in the future to any of the Subject Claims listed in the Seventeenth Omnibus Objection (and/or Exhibit A to the Seventeenth

³ The Order previously submitted with the Seventeenth Omnibus Objection has been slightly modified to state that no objection has been made to the Seventeenth Omnibus Objection.

Omnibus Objection), this Submission and/or the Order on any ground, whether legal or equitable, and whether or not stated herein or in the Seventeenth Omnibus Objection, and to amend, modify and/or supplement the Seventeenth Omnibus Objection and/or this Submission, including without limitation, to object to any other late-filed claims. Separate notice and hearing will be scheduled for such objection.

WHEREFORE, the Trust respectfully requests that the Court enter the Order attached to the Seventeenth Omnibus Objection (and hereto as Exhibit 2 for the Court's convenience) without further hearing and grant such other and further relief as is just and proper.

Dated: August 7, 2008

Respectfully submitted,

WHITE & CASE_{LLP}

By: /s/ Sam J. Alberts
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*Counsel to Sam J. Alberts,
Trustee for The DCHC Liquidating Trust*

CERTIFICATE OF SERVICE

I certify that on August 7, 2008, a copy of the foregoing Submission of Unopposed Order Approving the DCHC Liquidating Trust's Seventeenth Omnibus Objection to Claims Pursuant to 11 U.S.C. § 502 and Fed. R. Bankr. P. 3007 was sent by First Class Mail to the parties identified in Exhibit A to the Seventeenth Omnibus Objection and to the parties listed below.

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