

Exhibit D

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF COLUMBIA

In re:

GREATER SOUTHEAST COMMUNITY
HOSPITAL CORP., I, *et al.*,

Debtors.

Chapter 11

Jointly Administered
Case No. 02-2250
Judge S. Martin Teel, Jr.

**DECLARATION OF KERBY BADEN IN SUPPORT OF
THE DCHC LIQUIDATING TRUST'S TWENTIETH OMNIBUS OBJECTION
TO CLAIMS PURSUANT TO 11 U.S.C. § 502 AND FED. R. BANKR. P. 3007:
SUPERSEDED AND INSUFFICIENT DOCUMENTATION CLAIMS**

1. I, Kerby Baden, hereby submit this Declaration in support of the DCHC Liquidating Trust's Twentieth Omnibus Objection (the "Twentieth Omnibus Objection") to Certain Claims Pursuant to 11 U.S.C. § 502 and Fed. R. Bankr. P. 3007: Superseded and Insufficient Documentation Claims.

2. I am a Director of Invotex Group ("Invotex," f/k/a Maryland First Financial Services Corporation). I am a certified public accountant. Invotex is employed by Sam J. Alberts, Trustee for the DCHC Liquidating Trust (the "Trust"), as a financial advisor to the Trust, including with respect to the Twentieth Omnibus Objection.

3. I have personal knowledge of the matters discussed in this Declaration.

4. On November 20, 2002, Doctors Community Healthcare Corporation, Greater Southeast Hospital Corp. I, Michael Reese Medical Center Corporation, Pacifica of the Valley Corporation, Pacin Healthcare-Hadley Memorial Hospital Corporation and Pine Grove Hospital Corporation of Canoga Park, California (collectively, the "Debtors") filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code.

5. Invotex and me have analyzed the accounts payable databases (the “Books and Records”) and searched the Debtors’ Schedules filed with this Court on February 19, 2003 (the “Schedules”) for each of the Debtors, along with the related supporting documentation maintained within the BMC database. The Debtors’ Books and Records include detail invoice and payment information for parties to which the Debtors believed they owed a debt as of November 20, 2002 (the Debtors’ petition date). Invotex and I have also reviewed the proofs of claim related to the Subject Claims. Further, Invotex has consulted with personnel employed by the Reorganized Debtors who are familiar with the Debtors’ billing and payment systems and their prepetition obligations. I am not aware of any other source maintained or created by the Debtors that would detail claims against the Debtors as of November 20, 2002.

6. I have reviewed the Subject Claims listed on Exhibits A-B to the Twentieth Omnibus Objection.

7. Specifically related to the Subject Claims listed on Exhibit A to the Twentieth Omnibus Objection, Invotex has reviewed each Subject Claim and has compared it with its respective subsequently-filed and superseding claim, thereby determining that the obligation(s) represented by each Subject Claim is for the same or overlapping obligation represented by the respective subsequently-filed and superseding claim. Specifically, Invotex’s review consisted of comparing the detail support maintained for each of the Subject Claims in the BMC database to the documentation filed by the Creditor with its respective subsequently-filed and superseding proof of claim which included but was not limited to comparing names and addresses and/or matching the details of the claim. This review was performed to ensure (a) that the creditors on both the Subject Claim and the respective subsequently-filed and superseding claim are the same

and (b) that the obligations represented by the documentation to the Subject Claims are accounted for in the subsequently-filed and superseding claims.

8. Based on Invotex's and my review of the Subject Claims listed on Exhibit A, I have concluded that each of these Subject Claims has been superseded by a subsequently-filed and superseding claim and the respective Subject Claims should be disallowed and expunged in accordance with the column labeled "Claim to be Expunged" on Exhibit A at this time.

9. The proofs of claim related to the Subject Claims listed on Exhibit B to the Twentieth Omnibus Objection were filed without sufficient documentation. In each case, the filed proof of claim only included the proof of claim form or documentation which did not provide sufficient detail to support the claim amount. In addition, I searched the Debtors' Schedules and their accounts payable database as of the petition date. The Subject Claims listed on Exhibit B are not listed on either the Debtors' Schedules or in their accounts payable database. Based on my review of the Debtors' Schedules and their Books and Records, I do not see any indication that the amounts listed in the proofs of claims are owed to the claimants or are otherwise obligations of the Debtors or the Trust.

I declare under penalty of perjury that the foregoing is true and correct.

/s/ Kerby Baden

Kerby Baden
Director, Invotex Group

Executed this 11th day of August, 2008
Baltimore, Maryland