

**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 AMENDED PROPOSED ORDER APPROVING THE DCHC
LIQUIDATING TRUST'S EIGHTEENTH OMNIBUS OBJECTION TO POST-
PETITION CLAIMS PURSUANT TO 11 U.S.C. § 502 AND FED. R. BANKR. P. 3007
AND REQUEST TO CONTINUE HEARING WITH RESPECT TO HCA INC.'S CLAIM**

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

The DCHC Liquidating Trust (the "Trust") hereby submits the attached amended proposed Order (the "Amended Order") Approving the Trust's Eighteenth Omnibus Objection (the "Eighteenth Omnibus Objection") to Postpetition Claims Pursuant to 11 U.S.C. § 502 and Fed. R. Bankr. P. 3007 and Requests to Continue the Hearing with respect to HCA's Claim to September 22, 2008 at 10:30 a.m., and in support states as follows:

1. On July 14, 2008, the Trust filed with this Court the Eighteenth Omnibus Objection. The Eighteenth Omnibus Objection seeks to reduce and/or disallow the Subject Claims² on the basis that they are based, in whole or in part, on goods and services provided postpetition.

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 Eighteenth Omnibus Objection.

2. The deadline to respond to the Eighteenth Omnibus Objection was August 13, 2008.

3. The Trust served the Eighteenth Omnibus Objection in accordance with the Certificate of Service attached to the Eighteenth Omnibus Objection. *See* Declaration of John Hoke, dated August 25, 2008 (the “Hoke Decl.”), attached hereto as Exhibit 1 at ¶ 4.

4. With respect to Viomed Laboratories and KWKW Radio, service of the Eighteenth Omnibus Objection was subsequently returned to the Trust by the United States Postal Service (together, the “Returned Service Parties”). *Hoke Decl.* at ¶ 5. The Trust was able to determine alternative addresses for the Returned Service Parties and re-served the Eighteenth Omnibus Objection *via* first class mail to these parties’ respective new addresses on that same day. *Id.* Attached to the Hoke Decl. is a chart listing the Returned Service Parties, their original addresses and their new addresses where the Eighteenth Omnibus Objection was served. *Id.* at ¶ 6.

5. Two oppositions to the Eighteenth Omnibus Objection were filed with the Court. The first opposition was filed by the Hospital Association of Southern California on August 5, 2008 (DE 3412). The Trust and the Hospital Association of Southern California consensually resolved this opposition by stipulation filed with the Court on August 19, 2008 (DE 3423).

6. The second opposition was filed by HCA Inc. (“HCA”) on August 13, 2008 (DE 3419). The Trust filed a reply to HCA’s opposition on August 20, 2008 (DE 3427). Because HCA’s opposition and the Trust’s reply raise new issues, and at the request of HCA, the Trust seeks to continue the hearing solely with respect to the Trust’s objection to HCA’s claim to September 22, 2008 at 10:30 a.m.

7. The Trust also entered into a stipulation with SBC Pacific Bell, dated August 25, 2008 (DE 3431), which resolved the Eighteenth Omnibus Objection with respect SBC Pacific Bell's claim.

8. Attached hereto is the Amended Order. The Amended Order does not include the Hospital Association of Southern California or SBC Pacific Bell claims that were resolved by stipulation, or HCA's claim for which the parties seek a continuance of the hearing. In light of the fact that the Trust received no opposition to the Eighteenth Omnibus Objection with respect to the remaining claims not discussed above, all parties were properly served, and in an effort to minimize the Trust's administrative expenses, the Trust requests that this Court approve the attached Amended Order, without further hearing.

9. The Trust hereby reserves its right to object in the future to any of the Subject Claims listed in the Eighteenth Omnibus Objection (and/or Exhibit A to the Eighteenth Omnibus Objection), this Submission and/or the Amended Order on any ground, whether legal or equitable, and whether or not stated herein or in the Eighteenth Omnibus Objection, and to amend, modify and/or supplement the Eighteenth Omnibus Objection and/or this Submission, including without limitation, to object to any other postpetition claims. Separate notice and hearing will be scheduled for such objection.

WHEREFORE, the Trust respectfully requests that the Court enter the attached Amended Order without further hearing and grant such other and further relief as is just and proper.

Dated: August 25, 2008

Respectfully submitted,

WHITE & CASE_{LLP}

By: /s/ Jeffrey E. Schmitt

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*Counsel to Sam J. Alberts,
Trustee for The DCHC Liquidating Trust*

CERTIFICATE OF SERVICE

I certify that on August 25, 2008, a copy of the foregoing Submission of Amended Proposed Order Approving the DCHC Liquidating Trust's Eighteenth Omnibus Objection to Postpetition Claims Pursuant to 11 U.S.C. § 502 and Fed. R. Bankr. P. 3007 and Request to Continue Hearing With Respect to HCA's Claim was sent by First Class Mail to the parties identified in Exhibit A to the Eighteenth Omnibus Objection and to the parties listed below.

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