

**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 NINETEENTH OMNIBUS OBJECTION
TO CLAIMS AGAINST NON-DEBTORS AND
REQUEST TO CONTINUE HEARING WITH RESPECT TO THE CLAIMS OF
ARTHUR ANDERSEN AND MANAGED ALTERNATIVE CARE**

**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 Nineteenth Omnibus Objection (the "Nineteenth Omnibus Objection") to Claims Against Non-Debtors Pursuant to 11 U.S.C. § 502 and Fed. R. Bankr. P. 3007 and Requests to Continue the Hearing with respect to the claims of Arthur Andersen and Managed Alternative Care to October 8, 2008 at 10:30 a.m., and in support, states as follows:

1. On August 4, 2008, the Trust filed with this Court the Nineteenth Omnibus Objection. The Nineteenth Omnibus Objection seeks to reduce and/or disallow the Subject Claims² on the basis that they are against, in whole or in part, non-Debtors.

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. The deadline to respond to the Nineteenth Omnibus Objection was September 3, 2008.

3. The Trust served the Nineteenth Omnibus Objection in accordance with the Certificate of Service attached to the Nineteenth 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 Hall Prangle & Schoonveld (“HPS”), service of the Nineteenth Omnibus Objection was subsequently returned to the Trust by the United States Postal Service. *Hoke Decl.* at ¶ 5. The Trust was able to determine an alternative address for HPS and re-served the Nineteenth Omnibus Objection *via* first class mail to HPS’ new address on that same day. *Id.*

5. At the request of Arthur Andersen and Managed Alternative Care, the Trust seeks to continue the hearing on the Nineteenth Omnibus Objection to October 8, 2008 at 10:30 a.m. solely with respect to those parties’ claims. Continuing the hearing will permit Arthur Andersen and Managed Alternative Care more time to investigate the basis of their claims and discuss potential consensual resolution of their claims with the Trust.

6. The Trust also entered into a stipulation with American Medical Laboratories, Inc., dated September 8, 2008 (DE 3443), which resolved the Nineteenth Omnibus Objection with respect to American Medical Laboratories, Inc.’s claim.

7. Attached hereto is the Amended Order. The Amended Order does not include the claims of Arthur Andersen or Managed Alternative Care because those parties requested that the hearing on the Nineteenth Omnibus Objection be continued, or American Medical Laboratories, Inc. because its claim was resolved by stipulation. In light of the fact that the Trust received no opposition to the Nineteenth Omnibus Objection with respect to the remaining claims not

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

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.

8. The Trust hereby reserves its right to object in the future to any of the Subject Claims listed in the Nineteenth Omnibus Objection (and/or Exhibit A to the Nineteenth 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 Nineteenth Omnibus Objection, and to amend, modify and/or supplement the Nineteenth 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, continue the hearing on the Nineteenth Omnibus Objection to October 8, 2008 at 10:30 a.m. solely with respect to the claims of Arthur Andersen and Managed Alternative Care, and grant such other and further relief as is just and proper.

Dated: September 8, 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 September 8, 2008, a copy of the foregoing Submission of Amended Proposed Order Approving the DCHC Liquidating Trust's Nineteenth Omnibus Objection to Claims Against Non-Debtors Pursuant to 11 U.S.C. § 502 and Fed. R. Bankr. P. 3007 and Request to Continue Hearing With Respect to the Claims of Arthur Andersen and Managed Alternative Care was sent by First Class Mail to the parties identified in Exhibit A to the Nineteenth Omnibus Objection and to the parties listed below.

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