

**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 TWENTIETH OMNIBUS OBJECTION TO
CLAIMS PURSUANT TO 11 U.S.C. § 502 AND FED. R. BANKR. P. 3007:
SUPERSEDED AND INSUFFICIENT DOCUMENTATION CLAIMS**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proposed Order (the “Order”) Approving the Trust’s Twentieth Omnibus Objection (the “Twentieth Omnibus Objection”) to Superseded and Insufficient Documentation Claims Pursuant to 11 U.S.C. § 502 and Fed.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 August 19, 2008, the Trust filed with this Court the Twentieth Omnibus Objection. The Twentieth Omnibus Objection seeks to disallow and expunge the Subject

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”).

Claims² on the basis that each Subject Claim either (1) has been superseded by another claim; or (2) is a claim filed with insufficient proof or documentation to support the claim.

2. The deadline to respond to the Twentieth Omnibus Objection was September 18, 2008.

3. Due to certain conflicts, two firms served as counsel to the Trust with respect to the Twentieth Omnibus Objection: White & Case LLP and Stinson Morrison Hecker LLP.

4. The Trust served the Twentieth Omnibus Objection in accordance with the Certificate of Service attached to the Twentieth Omnibus Objection. *See* Declaration of John Hoke, dated September 19, 2008 (the "Hoke Decl."), attached hereto as Exhibit 1 at ¶ 4; Declaration of Darrell W. Clark, dated September 19, 2008 (the "Clark Decl."), attached hereto as Exhibit 2 at ¶ 5.

5. The Trust has received no opposition to the Twentieth Omnibus Objection and none appear to have been filed with the Court. Hoke Decl. at ¶ 5; Clark Decl. at ¶ 6.

6. In light of the fact that the Trust received no opposition to the Twentieth 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 Twentieth Omnibus Objection and Exhibits A-B to the Twentieth Omnibus Objection detailing the Subject Claims are attached hereto as Exhibit 3 for the Court's convenience.

7. The Trust hereby reserves its right to object in the future to any of the Subject Claims listed in the Twentieth Omnibus Objection (and/or Exhibit A to the Twentieth Omnibus Objection), this Submission and/or the Order on any ground, whether legal or equitable, and

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

whether or not stated herein or in the Twentieth Omnibus Objection, and to amend, modify and/or supplement the Twentieth Omnibus Objection and/or this Submission, including without limitation, to object to any other superseded or insufficient documentation 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 Twentieth Omnibus Objection (and hereto as Exhibit 3 for the Court's convenience) without further hearing and grant such other and further relief as is just and proper.

Dated: September 19, 2008

Respectfully submitted,

WHITE & CASE LLP

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

CERTIFICATE OF SERVICE

I certify that on September 19, 2008, a copy of the foregoing Submission of Unopposed Order Approving the DCHC Liquidating Trust's Twentieth 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 Exhibits A-B to the Twentieth Omnibus Objection and to the parties listed below.

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