

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

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

**THE DCHC LIQUIDATING TRUST'S SUBMISSION
OF DECLARATION IN RESPONSE TO COURT'S ORDER
APPROVING NINETEENTH OMNIBUS OBJECTION**

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

The DCHC Liquidating Trust (the "Trust"), by and through its undersigned counsel, hereby submits the Declaration of Kerby Baden (attached as Exhibit A) in Response to the Court's Order Approving the Trust's Nineteenth Omnibus Objection (the "Order") (DE 3450), which disallowed and/or reduced claims filed against non-Debtors, and states as follows:

1. The Order approved the Nineteenth Omnibus Objection, but stated that it "is signed with item 5 of Exhibit A removed, and as to it (Rural Metro Corp.'s claim) the Trust shall file an affidavit re the non-debtor entity owed amounts the claim included."

2. In response, as set forth in the attached Baden Declaration, Rural Metro Corp.'s claim included \$2,196.00 worth of invoices issued to Greater Southeast Hospital before it was purchased out of bankruptcy by Doctors Community Healthcare Corporation, free and clear of all claims. Therefore, the Trust requests that the Court enter the attached order reducing Rural Metro Corporation's claim by \$2,196.00.

WHEREFORE, the Trust respectfully requests that the Court enter the order attached hereto and such other and further relief as is just and proper.

Dated: September 24, 2008

Respectfully submitted,

WHITE & CASE^{LLP}

By: /s/ Jeffrey E. Schmitt
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Counsel for The DCHC Liquidating Trust

CERTIFICATE OF SERVICE

I certify that on September 24, 2008, a copy of the foregoing pleading was sent by First Class Mail to the following parties.

Rural Metro Corporation
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Scottsdale, AZ 85251

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