

**Exhibit A**

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**

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

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 Nineteenth 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. On May 27, 1999, Greater Southeast Community Hospital Foundation, Inc., Greater Southeast Community Hospital Corp. and Greater Southeast Management Company

filed for bankruptcy under chapter 11 of title 11 of the United States Code in the U.S. Bankruptcy Court for the District of Columbia. On November 16, 1999, the Court entered an Order Approving Sale of Assets and Interim Financing Pursuant to 11 U.S.C. § 363 and § 364 and Granting Related Relief, whereby the Court approved the sale of Greater Southeast Community Hospital to Doctors Community Healthcare Corporation free and clear of any and all liens, claims, encumbrances and interests of any kind or nature whatsoever, relating to “all professional and general liability claims.”

6. Rural Metro Corporation’s Claim No. 1477 in the amount of \$301,073.00 filed against Greater Southeast Community Hospital Corporation attaches a summary of invoices that includes invoices dated from August 5, 1999 to November 16, 1999, totaling \$2,196.00, issued to Greater Southeast Hospital. These invoices were issued to Greater Southeast Hospital before it was sold to Doctors Community Healthcare Corporation free and clear of all claims.

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

/s/ Kerby Baden

Kerby Baden  
Director, Invotex Group

Executed this 24th day of September, 2008  
Baltimore, Maryland