

Exhibit G

**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 IN SUPPORT OF
THE DCHC LIQUIDATING TRUST'S TWENTY-FIRST OMNIBUS OBJECTION
TO CLAIMS PURSUANT TO 11 U.S.C. § 502 AND FED. R. BANKR. P. 3007:
DUPLICATIVE, SUPERSEDED, BLANK, UNLIQUIDATED
AND MISCLASSIFIED CLAIMS**

1. I, Kerby Baden, hereby submit this Declaration in support of the DCHC Liquidating Trust's Twenty-First Omnibus Objection (the "Twenty-First Omnibus Objection") to Certain Claims Pursuant to 11 U.S.C. § 502 and Fed. R. Bankr. P. 3007: Duplicative, Superseded, Blank, Unliquidated and Misclassified Claims.

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 Twenty-First 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. Invotex and me have analyzed the accounts payable databases (the “Books and Records”) and searched the Debtors’ Schedules filed with this Court on February 19, 2003 (the “Schedules”) for each of the Debtors, along with the related supporting documentation maintained within the BMC database. The Debtors’ Books and Records include detail invoice and payment information for parties to which the Debtors believed they owed a debt as of November 20, 2002 (the Debtors’ petition date). Invotex and I have also reviewed the proofs of claim related to the Subject Claims. Further, Invotex has consulted with personnel employed by the Reorganized Debtors who are familiar with the Debtors’ billing and payment systems and their prepetition obligations. I am not aware of any other source maintained or created by the Debtors that would detail claims against the Debtors as of November 20, 2002.

6. I have reviewed the Subject Claims listed on Exhibits A-E to the Twenty-First Omnibus Objection.

7. Specifically related to the Subject Claims listed on Exhibit A to the Twenty-First Omnibus Objection, Invotex has matched each Subject Claim with another claim, both of which are for the same creditor and in the same amount. Upon review of these claims, Invotex has determined that each of the Subject Claims are duplicative of their “matched” claim and represent the same obligation.

8. With respect to Design Visual listed on Exhibit A to the Twenty-First Omnibus Objection, Design Visual has filed four claims in these cases: Claim Nos. 107, 438, 504 and 716. Claim No. 504 is for \$15,145.51. When combined, Design Visual’s other three claims (Claim Nos. 107, 438 and 716) total \$15,145.51. Upon review of such claims, Invotex determined that Claim No. 504 represents the same obligations as Claim Nos. 107, 438 and 716,

combined. Therefore, Design Visual's Claim Nos. 107, 438 and 716 are duplicative of Claim No. 504.

9. Upon review of the Subject Claims listed on Exhibit B to the Twenty-First Omnibus Objection, Invotex determined that each of such Subject Claims has been superseded by another claim, filed by the same claimant and representing the same or overlapping obligations. With respect to E-Z Staffing, Inc.'s Claim No. 729, such claim did not have a claim amount listed on the proof of claim. The supporting documentation included with the proof of claim indicates the outstanding amount due to the claimant of \$12,221.00. The related scheduled claim amount to be expunged is \$16,447.50. In comparing the invoices related to the scheduled amount and the supporting documentation filed with the proof of claim, it appears a payment was received by the claimant that reduced the outstanding amount due to \$12,221.00.

10. Each of the five Subject Claims listed on Exhibit C to the Twenty-First Omnibus Objection represents a claim that has been (1) either scheduled or filed in a blank amount, (2) contains no supporting documentation, (3) contains no description as to what the claim is for, and (4) has not been amended by another claim. Based upon its review of such Subject Claims, Invotex is believes that such Subject Claims have no claim value.

11. Each of the five Subject Claims listed on Exhibit D to the Twenty-First Omnibus Objection represents a filed proof of claim on which the claimant stated "unliquidated" as the claim amount. None of such Subject Claims have been amended.

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

/s/ Kerby Baden

Kerby Baden
Director, Invotex Group

Executed this 5th day of November, 2008
Baltimore, Maryland