

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

In re:	:	Chapter 11
	:	
GREATER SOUTHEAST COMMUNITY	:	Jointly Administered
HOSPITAL CORP., I, et al., <sup>1</sup>	:	Case No. 02-2250
	:	Judge S. Martin Teel, Jr.
Debtors.	:	
	:	

**SUBMISSION OF UNOPPOSED ORDER APPROVING  
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DUPLICATIVE, SUPERSEDED, BLANK, UNLIQUIDATED  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**

**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Order (the "Order") Approving the Trust's Twenty-First Omnibus Objection (the "Twenty-First Omnibus Objection") to Superseded and Insufficient Documentation Claims Pursuant to 11 U.S.C. § 502 and Fed.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 November 5, 2008, the Trust filed with this Court the Twenty-First Omnibus Objection. The Twenty-First Omnibus Objection seeks to disallow and expunge, or reclassify, the Subject Claims on the basis that each Subject Claim<sup>2</sup> either: (1) is duplicative of another claim; (2) has been superseded by another claim; (3) was scheduled or filed in a blank amount

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<sup>1</sup> 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").

<sup>2</sup> All undefined terms herein shall have the meaning assigned to them in the Twenty-First Omnibus Objection.

and without any supporting documentation or description; (4) is an unliquidated claim that does not assert any amount owing, was never amended and for which amounts are not believed to be owed; or (5) is a misclassified claim. The deadline to respond to the Twenty-First Omnibus Objection was December 8, 2008.

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

3. The Trust served the Twenty-First Omnibus Objection in accordance with the Certificate of Service attached to the Twenty-First Omnibus Objection. *See* Declaration of John Hoke, dated December 12, 2008 (the “Hoke Decl.”), attached hereto as Exhibit 1 at ¶ 4; Declaration of Darrell W. Clark, dated December 12, 2008 (the “Clark Decl.”), attached hereto as Exhibit 2 at ¶ 5.

4. With respect to certain parties (listed on Exhibit A to the Hoke Decl.), service of the Twenty-First Omnibus Objection was subsequently returned to the Trust by the United States Postal Service (collectively the “Returned Service Parties”). Hoke Decl. at ¶ 5. The Trust attempted to find alternative addresses for each of the Returned Service Parties and re-sent the Twenty-First Omnibus Objection to the Returned Service Parties at such alternative address. *Id.* The Trust believes that service was properly performed on all of the Returned Service Parties in the first instance on November 5, 2008.

5. The Trust has received no opposition to the Twenty-First Omnibus Objection and none appear to have been filed with the Court.<sup>3</sup> Hoke Decl. at ¶ 6; Clark Decl. at ¶ 6.

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<sup>3</sup> With respect to Haemo Stat, Inc.’s Claim No. 1979 (unliquidated), listed on Exhibit D to the Twenty-First Omnibus Objection, counsel to Haemo Stat contacted counsel to the Trust telephonically and spoke regarding such claim. Counsel to Haemo Stat agreed that Haemo Stat’s Claim No. 1979 was a “placeholder” claim in case Haemo Stat later had a claim, and that its

6. In light of the fact that the Trust received no opposition to the Twenty-First 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 Twenty-First Omnibus Objection and Exhibits A-E to the Twenty-First Omnibus Objection detailing the Subject Claims are collectively 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 Twenty-First Omnibus Objection (and/or Exhibit A-E to the Twenty-First Omnibus Objection), this Submission and/or the Order on any ground, whether legal or equitable, and whether or not stated herein or in the Twenty-First Omnibus Objection, and to amend, modify and/or supplement the Twenty-First Omnibus Objection and/or this Submission. Separate notice and hearing will be scheduled for such objection.

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Claim No. 1979 should be expunged. Haemo Stat's related claim (Claim No. 742 for \$108,377.50) is currently an allowed claim.

**WHEREFORE**, the Trust respectfully requests that the Court enter the Order attached to the Twenty-First 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: December 12, 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 December 12, 2008, a copy of the foregoing Submission of Unopposed Order Approving the DCHC Liquidating Trust's Twenty-First 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-E to the Twenty-First Omnibus Objection and to the parties listed below.

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