

**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 AMENDED PROPOSED 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SUPERSEDED AND INSUFFICIENT DOCUMENTATION CLAIMS**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 amended proposed Order (the "Amended Order") Approving the Trust's Twentieth Omnibus Objection (the "Twentieth Omnibus Objection") to Superseded and Insufficient Documentation Claims Pursuant to 11 U.S.C. § 502 and Fed.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, 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 Claims<sup>2</sup> on the basis that each Subject Claim either: (1) has been superseded by another claim; or (2) is a claim filed with insufficient proof or documentation to support the claim.

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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 Twentieth Omnibus Objection.

2. A hearing on the Twentieth Omnibus Objection was held on September 23, 2008 (the "Hearing"). At the Hearing, the Court indicated that it did not oppose the Trust's proposed treatment of the claims listed in the Twentieth Omnibus Objection, with the exception of two claims listed on Exhibit B (insufficient documentation claims): (1) Sandra Dorsey's Claim No. 1793 for \$17,589.40; and (2) Mark Engelhard's Claim No. 1678 for \$39,298.39 (together, the "Remaining Claims"). With respect to the Remaining Claims, the Court instructed the Trust to attempt to obtain additional evidence or documentation with respect to the validity of such claims, and continued the Hearing with respect to such claims to December 17, 2008.

3. Subsequent to the Hearing, the Trust contacted Ms. Dorsey and Mr. Engelhard regarding their respective claims and was able to consensually resolve the Remaining Claims pursuant to stipulations that were filed with the Court on December 15, 2008.

4. Because the Trust consensually resolved the Remaining Claims, they have been removed from the Order previously submitted with the Twentieth Omnibus Objection and Exhibit B to the Twentieth Omnibus Objection detailing the Subject Claims. The Amended Order attached hereto reflects such changes.

5. In light of the fact that the Court did not oppose the Trust's proposed relief with respect to the claims listed in the Twentieth Omnibus Objection (except with respect to the Remaining Claims), and that the Trust consensually resolved the Remaining Claims, and in an effort to minimize the Trust's administrative expenses, the Trust requests that this Court approve the attached Amended Order without further hearing.

6. 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-B to the Twentieth Omnibus Objection), this Submission and/or the Amended Order on any ground, whether legal

or equitable, and 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. Separate notice and hearing will be scheduled for such objection.

**WHEREFORE**, the Trust respectfully requests that the Court enter the Amended Order attached hereto without further hearing and grant such other and further relief as is just and proper.

Dated: December 15, 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 15, 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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