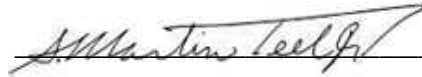


Signed: January 09, 2009.




S. Martin Teel, Jr.
United States Bankruptcy Judge

**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.	:	
	:	

**STIPULATION AND ORDER THAT THE SCHEDULED CLAIM OF
EVERETT WRIGHTSMAN IS AN OBLIGATION OF THE
REORGANIZED DEBTORS AND NOT THE DCHC LIQUIDATING TRUST**

The DCHC Liquidating Trust (the "Trust"), on the one hand, and the Reorganized Debtors, on the other hand, hereby agree and stipulate as follows:

WHEREAS, on November 20, 2002 (the "Petition Date"), Doctors Community Healthcare Corporation ("DCHC"), Greater Southeast Hospital Corp. I ("GSE"), Michael Reese Medical Center Corporation ("MR"), Pacifica of the Valley Corporation ("Pacifica"), Pacin Healthcare-Hadley Memorial Hospital Corporation ("Hadley") and Pine Grove Hospital Corporation of Canoga Park, California ("Pine Grove," collectively referred to along with DCHC, GSE, MR, Pacifica and Hadley as the "Debtors") filed separate voluntary petitions for

relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”). Pursuant to an order of this Court, the Debtors’ chapter 11 cases are being jointly administered for procedural purposes;

WHEREAS, on April 2, 2004, the Court entered an order (the “Confirmation Order”) approving the Debtors’ Second Amended Joint Plan of Reorganization (the “Plan”). On April 5, 2004, the Plan went into effect (the “Effective Date”).

WHEREAS, pursuant to the Plan, claims against the Debtors were effectively divided into two categories: (1) claims that would transfer to the Trust for satisfaction and (2) claims that would remain with the Debtors and effectively transfer to those Debtors that were being reorganized under the Plan, namely DCHC, GSE, Hadley, MR and Pacifica (together, the “Reorganized Debtors”) for satisfaction;

WHEREAS, DCHC scheduled a \$1.4 million unsecured claim in favor of Everett Wrightsman (the “Wrightsman Claim”);

WHEREAS, DCHC scheduled a Consulting Agreement, dated November 1, 2001, between DCHC and Mr. Wrightsman as an executory contract (the “Consulting Agreement”);

WHEREAS, the Wrightsman Claim appears to be based on amounts owed under the Consulting Agreement;

WHEREAS, the Plan, as amended by the Confirmation Order, provides that any executory contract not specifically designated by the Reorganized Debtors as either assumed or rejected is deemed assumed as of the Effective Date;

WHEREAS, on March 15, 2004, the Debtors filed their Plan Supplement, which included a list of executory contracts to be assumed or rejected under the Plan;

WHEREAS, on May 11, 2004, the Reorganized Debtors served their Notice of Assumption or Rejection (the "Notice"), which also designated certain executory contracts for either assumption or rejection;

WHEREAS, the Consulting Agreement was not listed in either the Plan Supplement or the Notice as being either assumed or rejected so that, pursuant to the Plan and Confirmation Order, the Consulting Agreement, to the extent it constituted an executory contract on the Effective Date, was deemed assumed as of the Effective Date;

WHEREAS, because the Consulting Agreement appears to have been assumed by the Reorganized Debtors, the Wrightsman Claim, to the extent valid, constitutes a cure obligation of the Reorganized Debtors;

WHEREAS, the Trust and the Reorganized Debtors entered into this Stipulation after arms-length and good faith negotiations;

IT IS THEREFORE

ORDERED that this Stipulation and Order is approved and entered; and it is further

ORDERED that the Wrightsman Claim, to the extent valid, represents an obligation of the Reorganized Debtors and not the Trust; and it is further

ORDERED that this Stipulation and Order is without prejudice to any rights the Reorganized Debtors may have to object, reduce, reschedule, disallow, and/or defend the Wrightsman Claim.

Dated: December 23, 2008

Respectfully submitted,

WHITE & CASE_{LLP}

By: /s/ Jeffrey E. Schmitt
Jeffrey E. Schmitt (D.C. Bar No. 490013)
701 Thirteenth St., N.W.
Washington, D.C. 20005
tel.: (202) 626-3600
fax: (202) 639-9355

*Counsel to Sam J. Alberts, Trustee
for The DCHC Liquidating Trust*

Dated: December 23, 2008

By: /s/ Patrick Collins
Ted Berkowitz (admitted *pro hac vice*)
Patrick Collins (admitted *pro hac vice*)
Farrell Fritz, P.C.
1320 RexCorp Plaza
Uniondale, New York 11556
tel.: (516) 227-0700
fax.: (516) 227-0777

Peter M. Friedman (D.C. Bar No.474966)
John H. Thompson (D.C. Bar No.484852)
Cadwalader Wickersham & Taft LLP
1201 F Street, NW
Washington, D.C. 20004
(202) 862-2200

Andrew M. Troop (*admitted pro hac vice*)
Cadwalader, Wickersham & Taft LLP
One World Financial Center
New York, NY 10281
(212) 504-6000

Counsel to the Reorganized Debtors

cc: Dennis Early, Esq.
Office of the U.S. Trustee
115 S. Union Street
Alexandria VA 22314

Everett Wrightsman, Esq.
2955 Coles Way
Atlanta, GA 30350

Ted Berkowitz, Esq.
Patrick Collins, Esq.
Farrell Fritz, P.C.
EAB Plaza
Uniondale, NY 11556-0120

Jeffrey E. Schmitt, Esq.
White & Case LLP
701 13th Street, NW
Washington, D.C. 20005

Certificate of Service Page 6 of 6
CERTIFICATE OF NOTICE

District/off: 0090-1
Case: 02-02250

User: myers
Form ID: pdf001

Page 1 of 1
Total Served: 2

Date Rcvd: Jan 09, 2009

The following entities were served by first class mail on Jan 11, 2009.
aty Ted A. Berkowitz, Farrell Fritz, PC, EAB Plaza, Uniondale, NY 11556-0120
+Everett Wrightsman Esq, 2955 Coles Way, Atlanta, GA 30350-1077

The following entities were served by electronic transmission.
NONE.

TOTAL: 0

***** BYPASSED RECIPIENTS *****

NONE.

TOTAL: 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.
USPS regulations require that automation-compatible mail display the correct ZIP.

I, Joseph Speetjens, declare under the penalty of perjury that I have served the attached document on the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 9): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Jan 11, 2009

Signature:

