

**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 OBJECTION TO RALPH DAVIS' CLAIM  
PURSUANT TO 11 U.S.C. § 502 AND FED. R. BANKR. P. 3007**

**TO THE HONORABLE S. MARTIN TEEL, JR.  
UNITED STATES BANKRUPTCY JUDGE:**

The DCHC Liquidating Trust (the "Trust") hereby submits the attached unopposed Order (the "Order") Approving the Trust's Objection (the "Objection") to Ralph Davis' Claim Pursuant to 11 U.S.C. § 502 and Fed. R. Bankr. P. 3007, which was not opposed by Mr. Davis, and in support states as follows:

1. On February 10, 2009, the Trust filed with this Court the Objection, which seeks to reclassify and reduce Ralph Davis' Claim No. 274 from an unsecured priority claim in the amount of \$2,100 to a "Class 8 — Patient Refund Claim" as defined under the Debtors' Second Amended Joint Chapter 11 Plan of Reorganization in the amount of \$100, because (1) the Davis Claim does not qualify for "priority" status under Bankruptcy Code section 507(a)(7) for deposits towards purchase lease or rental of property or services for personal or household use

---

<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").

that was not delivered or provided and (2) the supporting documentation does not support the claim amount.

2. The deadline to respond to the Objection was March 12, 2009.

3. The Trust served the Objection in accordance with the Certificate of Service attached to the Objection. *See* Declaration of John Hoke, dated March 17, 2009, attached hereto as Exhibit 1 at ¶ 4.

4. Service of the Objection was subsequently returned to the Trust by the United States Postal Service. *Id.* at ¶ 5. The Trust found an alternative address for Mr. Davis and resent the Objection to Mr. Davis at such alternative address. *Id.* The Trust believes that service was properly performed on Mr. Davis in the first instance on February 10, 2009.

5. The Trust has received no opposition to the Objection and none appear to have been filed with the Court. *Id.* at ¶ 6.

6. In light of the fact that the Trust received no opposition to the Objection and that Mr. Davis was 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 Objection is attached hereto as Exhibit 2 for the Court's convenience.

**WHEREFORE**, the Trust respectfully requests that the Court enter the Order attached to the Objection (and hereto as Exhibit 2 for the Court's convenience) without further hearing and grant such other and further relief as is just and proper.

Dated: March 17, 2009

Respectfully submitted,

**WHITE & CASE LLP**

By: /s/ Sam J. Alberts  
Sam J. Alberts (D.C. Bar No. 443260)  
Joshua M. Hantman (D.C. Bar No. 488058)  
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*

**CERTIFICATE OF SERVICE**

I certify that on March 17, 2009, a copy of the foregoing Submission of Unopposed Order Approving the DCHC Liquidating Trust's Objection to Ralph Davis' Claim Pursuant to 11 U.S.C. § 502 and Fed. R. Bankr. P. 3007 was sent by First Class Mail to the parties listed below.

Ralph Davis  
8636 S. Maryland Ave.  
Chicago, IL 60619

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

Andrew Troop, Esq.  
Cadwalader, Wickersham & Taft  
One World Financial Center  
New York, NY 10281

Ted A Berkowitz, Esq.  
Patrick Collins, Esq.  
Farrell Fritz, P.C.  
1320 RexCorp Plaza  
Uniondale, NY 11556  
Tel: 516-227-0700

*Counsel to the Reorganized Debtors*

/s/ Josh Hantman  
Josh Hantman