UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF COLUMBIA

In re: : Chapter 11

GREATER SOUTHEAST COMMUNITY: Jointly Administered HOSPITAL CORP., I, et *al.*, 1 : Case No. 02-2250

Case No. 02-2250 Judge S. Martin Teel, Jr.

Debtors.

SUBMISSION OF UNOPPOSED ORDER APPROVING THE DCHC LIQUIDATING TRUST'S OBJECTION TO BABAK DARVISH'S 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 "<u>Trust</u>") hereby submits the attached unopposed Order (the "<u>Order</u>") Approving the Trust's Objection (the "<u>Objection</u>") to Babak Darvish's Claim Pursuant to 11 U.S.C. § 502 and Fed. R. Bankr. P. 3007, which was not opposed by Dr. Darvish, and in support states as follows:

- 1. On February 10, 2009, the Trust filed with this Court the Objection, which seeks to reclassify Babak Darvish's Claim No. 1824 from an unsecured priority claim under Bankruptcy Code section 507(a)(4) to a "Class 10 General Unsecured Claim," as defined under the Debtors' Second Amended Joint Chapter 11 Plan of Reorganization, because it does not qualify for "priority" status under the Bankruptcy Code for wages, salaries or commissions.
 - 2. The deadline to respond to the Objection was March 12, 2009.

Hadley, MR, Pacifica and Pine Grove, the "Debtors").

¹ The affiliated debtors are PACIN-Hadley Memorial Hospital Corporation of Washington, D.C. ("<u>Hadley</u>"), Michael Reese Medical Center Corporation of Chicago, Illinois ("<u>MR</u>"), Pacifica Hospital of the Valley Corporation of Sun Valley, California ("<u>Pacifica</u>"), Pine Grove Hospital Corporation of Canoga Park, California ("<u>Pine Grove</u>") and their ultimate parent corporation, Doctors Community Hospital Corporation ("<u>DCHC</u>"; collectively with Greater Southeast Community Hospital Corporation I,

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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 \P 4.

4. The Trust has received no opposition to the Objection and none appear to have

been filed with the Court. *Id.* at $\P 5$.

5. In light of the fact that the Trust received no opposition to the Objection and that

Dr. Darvish 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 & CASELLP

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

2 WASHINGTON 1567965 (2K)

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 Babak Darvish's 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.

Dr. Babak Darvish P.O. Box 8058 Calabasas, CA 91372-8058

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