

Signed: March 23, 2009.

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



In re: _____ : Chapter 11
:
GREATER SOUTHEAST COMMUNITY : Jointly Administered
HOSPITAL CORP., I, et al.,¹
_____ S. Martin Teel, Jr.
Debtors. S. Martin Teel, Jr.
United States Bankruptcy Judge

**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

¹ 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
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*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

Exhibit 1

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF COLUMBIA

In re:

GREATER SOUTHEAST COMMUNITY
HOSPITAL CORP., I, *et al.*,

Debtors.

Chapter 11

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

**DECLARATION OF JOHN B. HOKE IN SUPPORT OF 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**

1. I, John B. Hoke, hereby submit this Declaration (the "Declaration") in support of the Submission (the "Submission") of the Unopposed Order Approving The DCHC Liquidating Trust's Objection (the "Objection") to Ralph Davis' Claim Pursuant to 11 U.S.C. § 502 and Fed. R. Bankr. P. 3007.

2. I am a legal assistant at White & Case LLP ("W&C"), 701 Thirteenth Street, NW Washington, DC 20005. I have been employed by W&C since January 14, 2008, and I participated in the service of the Objection.

3. I have personal knowledge of the matters discussed in this Declaration.

4. On February 10, 2009, W&C completed service of the Objection in accordance with the Certificate of Service filed in support of the Objection.

5. Service of the Objection was subsequently returned to W&C. I researched and located an alternative address for Mr. Davis and resent the Objection to such alternative address on the same day that the original service was returned to W&C. The new address is attached hereto as Exhibit A.

6. The Trust did not receive any opposition to the Objection and none appear to have been filed with the Court.

I declare under penalty of perjury that the foregoing is true and correct.

/s/ John B. Hoke

John B. Hoke

Executed this 17th day of March, 2009
Washington, DC

Exhibit A

Original Address	New Address	Date Returned	Date Re-Served
Ralph Davis 8636 S. Maryland Chicago, IL 60619	Ralph Davis 8636 S. Maryland Ave. Chicago, IL 60619	3/3/09	3/3/09

Exhibit 2

**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.	:	
	:	

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

Upon consideration of the Objection (the "Objection") of The DCHC Liquidating Trust seeking the entry of an order reclassifying Ralph Davis' Claim No. 1824 for \$2,100 (the "Claim"), it is hereby

ORDERED that the Objection is SUSTAINED; and it is further

ORDERED that the Claim is reduced and reclassified 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.

cc: Ralph Davis
8636 S. Maryland
Chicago, IL 60619

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