

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

Debtors. S. Martin Teel, Jr.
United States Bankruptcy Judge

**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 "Trust") hereby submits the attached unopposed Order (the "Order") Approving the Trust's Objection (the "Objection") 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.

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").

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. The Trust has received no opposition to the Objection and none appear to have been filed with the Court. *Id.* at ¶ 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 & 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
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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 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.
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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 BABAK DARVISH'S 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 Babak Darvish's 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. 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 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 BABAK DARVISH’S 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 Babak Darvish’s Claim No. 1824 for \$24,266.73 (the “Claim”), it is hereby

ORDERED that the Objection is SUSTAINED; and it is further

ORDERED that the Claim is reclassified from an unsecured priority claim to a “Class 10 — General Unsecured Claim” as defined under the Debtors’ Second Amended Joint Chapter 11 Plan of Reorganization.

cc: Dr. Babak Darvish
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Calabasas, CA 91372-8058

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