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COUNSEL TO THE DEBTORS AND
DEBTORS IN POSSESSION

COUNSEL TO THE OFFICIAL
COMMITTEE OF UNSECURED
CREDITORS

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:

Senior Care Centers, LLC, *et al.*,¹

Debtors.

§
§ Chapter 11
§
§ Case No. 18-33967 (BJH)
§
§ (Jointly Administered)
§

**NOTICE OF (I) ENTRY OF FINDINGS OF FACT, CONCLUSIONS OF
LAW, AND ORDER CONFIRMING THE THIRD AMENDED JOINT
PLAN OF REORGANIZATION UNDER CHAPTER 11 OF THE
BANKRUPTCY CODE, (II) OCCURRENCE OF THE EFFECTIVE DATE,**

¹ The Debtors in the Chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are set forth in the *Order (I) Directing Joint Administration of Chapter 11 Cases, and (II) Granting Related Relief* [Docket No. 569] and may also be found on the Debtors’ claims agent’s website at <https://omnimgt.com/SeniorCareCenters> (the “**Case Website**”). The location of the Debtors’ service address is 600 North Pearl Street, Suite 1100, Dallas, Texas 75201.

**AND (III) BAR DATE NOTICE FOR REJECTION DAMAGES CLAIMS,
ADMINISTRATIVE CLAIMS AND PROFESSIONAL FEE CLAIMS**

PLEASE TAKE NOTICE OF THE FOLLOWING:

1. On December 4, 2018, Senior Care Centers, LLC and its affiliated debtors and debtors in possession (the “**Debtors**”) filed voluntary petitions for relief under chapter 11 of the United States Bankruptcy Code in the United States Bankruptcy Court for the Northern District of Texas.

2. On October 16, 2019, the Debtors filed the *Third Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code* [Docket No. 2053] (the “**Third Amended Plan**”) and the *Disclosure Statement for the Third Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code* [Docket No. 2054] (the “**Third Amended Disclosure Statement**”). On October 24, 2019, the Debtors filed the *Notice of Filing of Solicitation Version of Disclosure Statement for the Third Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code* [Docket No. 2094] (the “**Solicitation Notice**”). Attached to the Solicitation Notice as Exhibit A, was the solicitation version of the Third Amended Plan (as may be amended and/or supplemented, the “**Plan**”) and attached to the Solicitation Notice as Exhibit C was the solicitation version of the Third Amended Disclosure Statement (the “**Disclosure Statement**”).

3. On December 13, 2019, the Court entered the *Findings of Fact, Conclusions of Law, and Order Confirming Third Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code* [Docket No. 2376] (the “**Confirmation Order**”).²

4. On March 27, 2020 (the “**Effective Date**”), all conditions to the occurrence of the Effective Date set forth in the Plan and Confirmation Order were satisfied or waived in accordance therewith, and the Effective Date of the Plan occurred.

5. Rejection of Executory Contracts and Unexpired Leases. Pursuant to the Plan and Confirmation Order, all Executory Contracts and Unexpired Leases that were not assumed during the Chapter 11 Cases are deemed rejected as of the Effective Date. If you hold a claim arising from such rejection, you must file and serve a proof of claim (a “**Proof of Claim**”) no later than **April 29, 2020** (the “**Rejection Damages Claims Bar Date**”). Proofs of Claim must be filed with the Debtors’ claims agent, Omni Management Group, 5955, DeSoto Avenue, Suite 100, Woodland Hills, CA 91367 or the Clerk of the Court. **Holders of such Claims that do not timely File Proofs of Claim are forever barred, estopped and enjoined from asserting such Claims against the Debtors, the Reorganized Debtors and their respective Estates, or the property of any trust established to effectuate the Plan and Confirmation Order.**

6. Scheduled Administrative Claims. No later than April 4, 2020, the Debtors shall file and post on the Case Website the Scheduled Administrative Claims that are based on unpaid liabilities incurred by the Debtors in the ordinary course of their business after the Petition Date. **If you have an Administrative Claim that appears on the Scheduled Administrative Claim list, you do not have to file an Administrative Claims Request (as defined below) with the**

² Capitalized terms used herein but not otherwise defined shall have the meanings ascribed to them in the Confirmation Order, Plan, and Disclosure Statement.

Court or otherwise comply with Paragraph 7 below. All Scheduled Administrative Claims will be paid in the ordinary course of business by the Reorganized Debtors.

7. Administrative Claims Bar Date and Filing. Pursuant to the Plan and Confirmation Order, each person or entity that holds or wishes to assert a claim that such person believes is an Administrative Claim except for Administrative Claims which are Professional Fee Claims, Priority Tax Claims, or Scheduled Administrative Claims (see Paragraph 6 above), must file with the Court an application (an “**Administrative Claims Request**”) requesting allowance of such Administrative Claim on or before **April 29, 2020** (the “**Administrative Claims Bar Date**”). An Administrative Claims Request must be served on: (a) counsel to the Debtors, Polsinelli PC, Polsinelli PC, 600 3rd Avenue, 42nd Floor, New York, New York 10016 (Attention: Jeremy R. Johnson) and 2950 N. Harwood, Suite 2100, Dallas, Texas 75201 (Attention: Trey A. Monsour); (b) counsel to the Committee, Greenberg Traurig, LLP, 77 West Wacker Drive, Suite 3100, Chicago, Illinois 60601 (Attention: Nancy A. Peterman) and 1000 Louisiana Street, Suite 1700, Houston, Texas 77002 (Attention: Shari L. Heyen); and (c) the Liquidating Trustee, Alan D. Halperin, Halperin Battaglia Benzija, LLP, 40 Wall Street, 37th Floor, New York, New York 10005 (Attention: Alan D. Halperin). Such Administrative Claims Requests must include, at a minimum: (a) the name of the Holder of the Administrative Claim, (b) the amount of the Administrative Claim, and (c) the basis of the Administrative Claim (including any documentation or evidence supporting such claim).

8. **Holders of Administrative Claims that are required to file and serve an Administrative Claims Request that do not file and serve such a request on or before April 29, 2020, shall be forever barred, estopped and enjoined from asserting such Administrative Claims against the Debtors, the Reorganized Debtors and their respective estates and properties, and such Administrative Claims will be deemed discharged as of the Effective Date.**

9. Professional Fee Claims. Pursuant to the Plan and Confirmation Order, **all** final requests for Professional Fee Claims must be filed with the Court (a “**Final Fee Application**”) no later than **April 29**

10. **, 2020** (the “**Professional Fee Claims Bar Date**”). All Final Fee Applications must (a) be in writing; (b) comply with the Bankruptcy Rules, the Local Rules of the Court and any orders of the Court entered in these Chapter 11 Cases; and (c) be filed with the Bankruptcy Court and served upon the following parties so to be actually received by the Professional Fee Claims Bar Date: (a) counsel to the Debtors, Polsinelli PC, Polsinelli PC, 600 3rd Avenue, 42nd Floor, New York, New York 10016 (Attention: Jeremy R. Johnson) and 2950 N. Harwood, Suite 2100, Dallas, Texas 75201 (Attention: Trey A. Monsour); (b) counsel to the Committee, Greenberg Traurig, LLP, 77 West Wacker Drive, Suite 3100, Chicago, Illinois 60601 (Attention: Nancy A. Peterman) and 1000 Louisiana Street, Suite 1700, Houston, Texas 77002 (Attention: Shari L. Heyen); (c) the Office of the United States Trustee, 1100 Commerce Street, Room 976, Dallas, Texas 75242 (Attention: Meredyth A. Kippes); and (d) the Liquidating Trustee, Alan D. Halperin, Halperin Battaglia Benzija, LLP, 40 Wall Street, 37th Floor, New York, New York 10005 (Attention: Alan D. Halperin).

11. The Plan and Confirmation Order contain other provisions which may affect your rights. You are encouraged to review the Plan and Confirmation Order in their entirety.

12. ALL PLEADINGS FILED IN THESE CHAPTER 11 CASES ARE AVAILABLE FOR FREE AT: <https://omnimgt.com/SeniorCareCenters>.

Dated: March 30, 2020
Dallas, Texas

Respectfully submitted,

POLSINELLI PC

GREENBERG TRAURIG, LLP

/s/ Trey A. Monsour

/s/ Shari L. Heyen

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Counsel to the Debtors and Debtors in Possession

Counsel to the Official Committee of Unsecured Creditors