

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

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In re: : Chapter 11
  
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CENTER CITY HEALTHCARE, LLC d/b/a : Case No. 19-11466 (KG)
  
HAHNEMANN UNIVERSITY HOSPITAL, *et* : (Jointly Administered)
  
*al.*<sup>1</sup> :
  
: Re: D.I. 83
  
Debtors. :
  
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**NOTICE OF APPOINTMENT OF PATIENT CARE OMBUDSMAN  
UNDER 11 U.S.C. § 333**

Pursuant to Section 333 of the Bankruptcy Code, Rule 2007.2(c) of the Federal Rules of Bankruptcy Procedure, and the Order Directing the Appointment of a Patient Care Ombudsman entered on July 2, 2019 (D.I. 83) (the “Order”), Andrew R. Vara, Acting United States Trustee for Region 3, hereby appoints SUZANNE KOENIG to serve as the Patient Care Ombudsman in the above-captioned cases. Ms. Koenig’s verified statement pursuant to Federal Rule of Bankruptcy Procedure 2007.2(c) is attached as Exhibit A.

Section 333 of the Bankruptcy Code provides that the Patient Care Ombudsman shall:

- (1) monitor the quality of patient care provided to patients of the debtor, to the extent necessary under the circumstances, including interviewing patients and physicians;
- (2) no later than 60 days after appointment (and not less frequently than at 60 day

<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are: Center City Healthcare, LLC (3341), Philadelphia Academic Health System, LLC (8681), St. Christopher’s Healthcare, LLC (8395), Philadelphia Academic Medical Associates, LLC (8165), HPS of PA, L.L.C. (1617), SCHC Pediatric Associates, L.L.C. (0527), St. Christopher’s Pediatric Urgent Care Center, L.L.C. (6447), SCHC Pediatric Anesthesia Associates, L.L.C. (2326), StChris Care at Northeast Pediatrics, L.L.C. (4056), TPS of PA, L.L.C. (4862), TPS II of PA, L.L.C. (5534), TPS III of PA, L.L.C. (5536), TPS IV of PA, L.L.C. (5537), and TPS V of PA, L.L.C. (5540). The Debtors’ mailing address is 230 North Broad Street, Philadelphia, Pennsylvania 19102.

intervals thereafter), report to the Court after notice to the parties in interest, at a hearing or in writing, regarding the quality of patient care provided to patients of the debtor as per the Order;

- (3) if the ombudsman determines that the quality of patient care provided to patients of the debtor is declining significantly or is otherwise being materially compromised, file with the Court a motion or a written report, with notice to the parties in interest immediately upon making such determination; and
- (4) maintain any information obtained by such ombudsman under Section 333 of the Bankruptcy Code that relates to patients (including information relating to patient records) as confidential information. Such ombudsman may not review confidential patient records unless the court approves such review in advance and imposes restrictions on such ombudsman to protect the confidentiality of such records.

Federal Rule of Bankruptcy Procedure 2015.1 provides that the Patient Care Ombudsman shall file reports:

A patient care ombudsman, at least 14 days before making a report under § 333(b)(2) of the Code, shall give notice that the report will be made to the court, unless the court orders otherwise. The notice shall be transmitted to the United States trustee, posted conspicuously at the health care facility that is the subject of the report, and served on: the debtor; the trustee; all patients; and any committee elected under § 705 or appointed under § 1102 of the Code or its authorized agent, or, if the case is a chapter 9 municipality case or a chapter 11 reorganization case and no committee of unsecured creditors has been appointed under § 1102, on the creditors included on the list filed under Rule 1007(d); and such other entities as the court may direct. The notice shall state the date and time when the report will be made, the manner in which the report will be made, and, if the report is in writing, the name, address, telephone number, email address, and website, if any, of the person from whom a copy of the report may be obtained at the debtor's expense.

Respectfully submitted,

ANDREW R. VARA  
ACTING UNITED STATES TRUSTEE  
REGION 3

By: /s/T. Patrick Tinker  
T. Patrick Tinker  
Assistant United States Trustee

Dated: July 3, 2019

**EXHIBIT A**

**Verified Statement**

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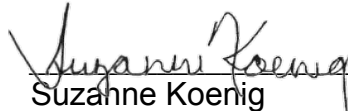
**VERIFIED STATEMENT OF SUZANNE KOENIG**

I hereby verify that I have no connections with the above-captioned debtors, creditors, any other parties in interest, their respective attorneys and accountants, the United States Trustee, or any person employed in the Office of the United States Trustee, except as follows: **(If you have no connections, write “none”.)**

In my individual capacity, I have no connections with the above-captioned debtors, creditors, any other parties in interest, their respective attorneys and accountants, the United States Trustee, or any person employed in the Office of the United States Trustee. I am president of SAK Management Services, LLC (“SAK”) and for disclosure purposes have attached **Exhibit A** that lists connections between SAK and certain creditors and other parties in interest, which connections are unrelated to the Debtors or these cases.

I declare (or certify, verify or state) under penalty of perjury that the foregoing is true and correct.

DATE: July 2, 2019

  
\_\_\_\_\_  
Suzanne Koenig

**SAK previously represented the following parties on matters unrelated to the Debtors or these cases:**

<u>Banks</u>	Capital One, N.A.
<u>Certain Litigation Parties</u>	Reading Hospital

**SAK entered into engagement letters with the following parties to co-represent clients on matters unrelated to the Debtors of these cases:**

<u>Other Creditors/Contract Parties</u>	David Small (of Huron Consulting)
<u>Other Creditors/Contract Parties</u>	GlassRatner Advisory & Capital Group, LLC
<u>Other Creditors/Contract Parties</u>	Huron Consulting Services LLC
<u>Other Creditors/Contract Parties</u>	Marcum LLP

**SAK has managed facilities that do business with the following parties in interest**

<u>Unions</u>	National Union of Hospital and Health Care Employees, AFSCME, AFL-CIO,
<u>Utilities</u>	Comcast Cablevision
<u>Utilities</u>	Constellation Energy Gas
<u>Utilities</u>	Constellation NewEnergy Gas
<u>Utilities</u>	DirectTV LLC
<u>Utilities</u>	Verizon
<u>Utilities</u>	Verizon Business
<u>Utilities</u>	Verizon CABS
<u>Insurers</u>	ACE American Insurance Company
<u>Insurers</u>	Axis Insurance Company
<u>Insurers</u>	Chubb - Federal Insurance Company
<u>Pavors</u>	Aetna/Coventry
<u>Pavors</u>	Cigna HealthSpring
<u>Pavors</u>	Humana
<u>Pavors</u>	Medicaid
<u>Pavors</u>	United Health Care
<u>Taxing Agencies</u>	Internal Revenue Service
<u>Secured Parties</u>	Capital One, N.A.
<u>Secured Parties</u>	GE HFS, LLC
<u>Banks</u>	Wells Fargo Bank, N.A.
<u>Banks</u>	Bank of America, N.A.
<u>Banks</u>	Capital One, N.A.
<u>Other Creditors/Contract Parties</u>	Abiomed, Inc.
<u>Other Creditors/Contract Parties</u>	Aramark Uniform and Career Apparel Group, Inc.
<u>Other Creditors/Contract Parties</u>	CohnReznick LLP
<u>Other Creditors/Contract Parties</u>	De Lage Landen Financial Services, Inc.
<u>Other Creditors/Contract Parties</u>	DIRECTV, Inc.
<u>Other Creditors/Contract Parties</u>	General Electric Company, by and through its GE Healthcare division
<u>Other Creditors/Contract Parties</u>	Hill-Rom Company, Inc.
<u>Other Creditors/Contract Parties</u>	Iron Mountain Information Management, LLC
<u>Other Creditors/Contract Parties</u>	KCI USA, Inc.
<u>Other Creditors/Contract Parties</u>	LinkedIn Corporation
<u>Other Creditors/Contract Parties</u>	Marcum LLP
<u>Other Creditors/Contract Parties</u>	Medline Industries Holdings, L.P
<u>Other Creditors/Contract Parties</u>	Medline Industries, Inc.
<u>Other Creditors/Contract Parties</u>	Pitney Bowes Inc.
<u>Other Creditors/Contract Parties</u>	Quest Diagnostic Clinical Laboratories Inc.
<u>Other Creditors/Contract Parties</u>	Quest Diagnostics Infectious Disease, Inc.
<u>Other Creditors/Contract Parties</u>	Siemens Industry, Inc.
<u>Other Creditors/Contract Parties</u>	Smith & Nephew, Inc.
<u>Other Creditors/Contract Parties</u>	Sodexo Management, Inc.
<u>Other Creditors/Contract Parties</u>	Stericycle, Inc.
<u>Other Creditors/Contract Parties</u>	Xerox Corporation

**EXHIBIT B**


**Acknowledgement of Privacy Obligations**

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**PATIENT CARE OMBUDSMAN’S ACKNOWLEDGMENT  
OF PRIVACY OBLIGATIONS UNDER 11 U.S.C. § 333(c)**

I, Suzanne Koenig, acknowledge that Section 333(c) of the Bankruptcy Code requires that I maintain the confidentiality of information relating to patients (including information relating to patient records) which I obtain during my appointment as a patient care ombudsman pursuant to Section 333(a)(2)(A). Furthermore, I hereby acknowledge that I shall comply with such requirements.

  
\_\_\_\_\_  
Suzanne Koenig  
Patient Care Ombudsman

July 2, 2019  
\_\_\_\_\_  
Date

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