

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

In re:

CENTER CITY HEALTHCARE, LLC d/b/a
HAHNEMANN UNIVERSITY HOSPITAL,
et al.

Debtor

Chapter 11

Case No. 19-11466 (KG)

Joint Administration Requested

**PENNSYLVANIA ASSOCIATION OF STAFF NURSES AND ALLIED
PROFESSIONALS JOINDER IN THE OBJECTION OF THE UNITED STATES TO
DEBTOR'S MOTION FOR ENTRY OF ORDER APPROVING SALE OF THE
DEBTOR'S RESIDENT PROGRAM ASSETS FREE AND CLEAR OF ALL LIENS,
CLAIMS, ENCUMBRANCES AND INTERESTS TO THE STALKING HORSE BIDDER
ON THE TERMS OF THE STALKING HORSE BID AS SET FORTH IN THE
STALKING HORSE SALE AGREEMENT**

Pennsylvania Association of Staff Nurses and Allied Professionals, (hereinafter, "PASNAP"), by and through their undersigned counsel, hereby joins ("PASNAP Joinder") in the *United States Objection to Debtor's Motion For Entry of an Order Approving the Sale of Debtor's Resident Program Assets Free and Clear of All Liens, Claims, Encumbrances, and Interests to the Stalking Horse Bidder on the terms of the Stalking Horse Bid as set forth in the Stalking Horse Sale Agreement*, [Docket No. 363] (the "United States Objection") for the reasons set forth in the United States Objection. PASNAP supports a sale to any bidder who seeks to keep Hahnemann Open as a going concern full service hospital for the community it serves.

PASNAP expressly reserves and preserves all rights, claims, arguments, defenses and remedies with respect to the *Debtor's Motion For Entry of an Order Approving the Sale of Debtor's Resident Program Assets Free and Clear of All Liens, Claims, Encumbrances, and Interests to the Stalking Horse Bidder on the terms of the Stalking Horse Bid as set forth in the Stalking Horse Sale Agreement* [Docket No. 363] (the "United States Objection") and to

supplement, modify and amend this PASNAP Joinder, to seek discovery, and to raise additional objections in writing or orally at the hearing on the Debtor's Motion.

Dated: August 14, 2019

MARKOWITZ & RICHMAN

/s/ Claiborne S. Newlin

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-and-

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*Co-Counsel to Pennsylvania Association of Staff Nurses
and Allied Professionals*

CERTIFICATE OF SERVICE

I, Claiborne S. Newlin, Esq., hereby certify that on August 14, 2019, I caused a true and correct copy of the *PASNAP Joinder in the United States Objection to Debtor's Motion For Entry of an Order Approving the Sale of Debtor's Resident Program Assets Free and Clear of All Liens, Claims, Encumbrances, and Interests to the Stalking Horse Bidder on the terms of the Stalking Horse Bid as set forth in the Stalking Horse Sale Agreement*, to be served as follows:

(1) electronically on those parties who consented to electronic service via CM/ECF, and (2) by first class mail to all parties as follows:

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Dated: August 14, 2019

MARKOWITZ & RICHMAN

/s/ Claiborne S. Newlin
Claiborne S. Newlin, Esq.
(DE Bar No. 4745)