

**STRADLEY RONON STEVENS & YOUNG, LLP**

100 Park Avenue, Suite 2000  
New York, NY 10017  
Deborah A. Reperowitz  
(212) 812-4124  
dreperowitz@stradley.com

and

2005 Market Street, Suite 2600  
Philadelphia, PA 19103  
Brian P. Seaman  
Mischa S. Wheat  
(215) 564-8000  
bseaman@stradley.com  
mwheat@stradley.com

*Proposed Attorneys for the Debtors  
and Debtors-in-Possession*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF NEW YORK**

<b>In re:</b>	:	
	:	<b>Case No. 19- _____ (____)</b>
<b>GOOD SAMARITAN LUTHERAN HEALTH CARE CENTER, INC. d/b/a BETHLEHEM COMMONS CARE CENTER, et al.<sup>1</sup>,</b>	:	<b>Chapter 11 (Main Case)</b>
	:	<b>Case No. 19- _____ (____)</b>
	:	
<b>Debtors.</b>	:	<b>Joint Administration Pending</b>
	:	

**NOTICE OF COMMENCEMENT OF CHAPTER 11 CASE AND NOTICE OF  
HEARINGS ON FIRST DAY MOTIONS**

PLEASE TAKE NOTICE that on December 11, 2019, the above captioned Debtors, and Debtors-in-possession (the “**Debtors**”), commenced cases under chapter 11 of title 11 of the United States Code (the “**Bankruptcy Code**”) in the United States Bankruptcy Court for the

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Good Samaritan Lutheran Health Care Center, Inc. d/b/a Bethlehem Commons Care Center (0663) and Kenwood Manor, Inc. (8178).

Northern District of New York (the “**Court**”). These cases have been assigned to the Honorable Robert E. Littlefield Jr. (the “**Chapter 11 Cases**”).

PLEASE TAKE FURTHER NOTICE that in connection with the Chapter 11 Cases, a hearing (the “**Hearing**”) to consider the Debtors’ first day motions (the “**First Day Motions**”) has been scheduled for *December 13, 2019 at 11:30 AM before the Honorable Robert E. Littlefield Jr., United States Bankruptcy Judge, James T. Foley United State Courthouse, 445 Broadway, Suite 330, Albany, NY 12207.*

PLEASE TAKE FURTHER NOTICE that at the Hearing, the Debtor will move the Bankruptcy Court for entry of order in connection with the following First Day Motions:

- Motion of Debtors for Entry of an Order (I) Directing Joint Administration of Their Chapter 11 Cases, and (II) Granting Related Relief
- Motion of Debtors for Entry of an Order Authorizing the Filing of a Consolidated Mailing Matrix
- Application for Entry of an Order Authorizing the Retention and Employment of Omni Agent Solutions as Claims and Noticing Agent *Nunc Pro Tunc* to the Petition Date
- Motion of Debtors for Entry of Interim and Final Orders (A) Authorizing Payment of (I) Certain Prepetition Workforce Claims, Including Wages, Salaries, Compensation, and Reimbursement of Expenses (II) Certain Employee Benefits, (III) Reimbursement to Employees for Prepetition Expenses, (B) Confirming Right to Continue Employee Benefits on Postpetition Basis, and (C) Granting Related Relief

- Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing Continued Use of Existing Cash Management System, Including Maintenance of Existing Bank Accounts and (II) Authorizing Continuation of Existing Deposit Practices
- Motion of Debtors for Entry of an Order Authorizing Procedures to Maintain and Protect Confidential Patient Information
- Motion of Debtors for Entry of Interim and Final Orders (I) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Service, (II) Approving the Debtors' Proposed Adequate Assurance of Payment for Postpetition Services, and (III) Establishing Procedures for Resolving Requests for Additional Adequate Assurance of Payment
- Motion of Debtors for Entry of an Order (I) Authorizing Continuation of Various Insurance Policies, and Payment of Prepetition Obligations Incurred in the Ordinary Course of Business in Connection, if any, therewith, (II) Authorizing Banks to Honor and Process Checks and Electronic Transfer Requests Related Thereto, and (III) Preventing Insurance Companies From Giving Any Notice of Termination or Otherwise Modifying Any Insurance Policy Without First Obtaining Relief From the Automatic Stay
- Motion for Entry of Interim and Final Orders (I) Authorizing Debtors-in-Possession to Obtain Postpetition Financing Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 364 and 507, (II) Granting Liens, Security Interests and Superpriority Claims, (III) Authorizing Use of Cash Collateral and Granting Adequate

Protection; (IV) Modifying the Automatic Stay; and (V) Scheduling a Final Hearing

PLEASE TAKE FURTHER NOTICE that your rights may be affected. You should read and discuss this notice with your attorney if you have one in this bankruptcy case. (If you do not have one in this bankruptcy case, you may wish to consult one.) If you do not want the Court to grant the relief requested in the First Day Motions, or if you want the Court to consider your view on the First Day Motions, you or your attorney must attend the First Day Hearings. If you or your attorney does not attend the First Day Hearings, the Court may grant the relief requested in the First Day Motions.

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PLEASE TAKE FURTHER NOTICE that the First Day Motions may be viewed on the Bankruptcy Court's website [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov) for those with a PACER password. The First Day Motions may also be obtained by contacting Deborah Reperowitz by telephone (212-812-4138) or e-mail ([dreperowitz@stradley.com](mailto:dreperowitz@stradley.com)). **Any documents requested will be forwarded to the requesting party by electronic mail.**

Dated: December 12, 2019

STRADLEY RONON STEVENS AND YOUNG, LLP

By: /s/ Deborah A. Reperowitz  
Deborah A. Reperowitz  
100 Park Avenue, Suite 2000  
New York, NY 10017  
(212) 812-4124  
[dreperowitz@stradley.com](mailto:dreperowitz@stradley.com)

and

2005 Market Street, Suite 2600  
Philadelphia, PA 19103  
Brian P. Seaman  
Mischa S. Wheat  
(215) 564-8000  
[bseaman@stradley.com](mailto:bseaman@stradley.com)  
[mwheat@stradley.com](mailto:mwheat@stradley.com)

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