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

In re:	:	
	:	Case No. 19-12215 (REL)
GOOD SAMARITAN LUTHERAN HEALTH	:	Chapter 11 (Main Case)
CARE CENTER, INC. d/b/a BETHLEHEM	:	Case No. 19-12216 (REL)
COMMONS CARE CENTER, et al.¹,	:	
	:	Jointly Administered
Debtors.	:	

NOTICE OF (I) FILING OF (A) SECOND AMENDED CHAPTER 11 PLAN OF LIQUIDATION AND SECOND AMENDED DISCLOSURE STATEMENT, (B) REVISED PROPOSED ORDER PRELIMINARILY APPROVING DISCLOSURE STATEMENT, AND (C) REVISED SCHEDULES TO ACCOMPANY PROPOSED ORDER; AND (II) HEARING ON MOTION FOR PRELIMINARILY APPROVAL OF DISCLOSURE STATEMENT

PLEASE TAKE NOTICE that on April 10, 2020, Good Samaritan Lutheran Health Care Center, Inc. d/b/a Bethlehem Commons Care Center (“**Good Samaritan**”) and Kenwood Manor, Inc. (“**Kenwood**”, and together with Good Samaritan, the “**Debtors**”) filed the *Debtors’ Joint Chapter 11 Plan of Liquidation* [Dkt. No. 154] (the “**Plan**”) and the *Debtors’ Disclosure Statement to Accompany the Debtors’ Joint Chapter 11 Plan of Liquidation* [Dkt. No. 153]j (the “**Disclosure Statement**”).

¹ 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).

PLEASE TAKE FURTHER NOTICE that on April 10, 2020, the Debtors filed the *Motion of Debtors for Order: (I) Preliminarily Approving the Disclosure Statement; (II) Authorizing the Employment of Omni Agent Solutions, Inc. as Balloting Agent; (III) Approving Solicitation and Voting Procedures; (IV) Approving Forms of Notices and Ballots; (V) Scheduling Combined Hearing to Consider Final Disclosure Statement Approval and Plan Confirmation; and (VI) Granting Related Relief* [Dkt. No. 155] (the “**Disclosure Statement Motion**”), and, attached to the Disclosure Statement Motion as Exhibit 1, a proposed Order granting the Disclosure Statement Motion (the “**Proposed Order**”) along with schedules attached thereto (the “**Schedules**”).

PLEASE TAKE FURTHER NOTICE that on October 20, 2020, the Debtors filed amended versions of the Plan and Disclosure Statement [Dkt. Nos. 254 and 255] (respectively, the “**First Amended Plan**” and the “**First Amended Disclosure Statement**”), along with blacklines against the originally filed Plan and Disclosure Statement.

PLEASE TAKE FURTHER NOTICE that on October 20, 2020, the Debtors filed a revised Proposed Order [Dkt. No. 256] (the “**Revised Proposed Order**”) along with revised Schedules (the “**Revised Schedules**”), and blacklines against the originally filed Proposed Order and Schedules.

PLEASE TAKE FURTHER NOTICE that on October 29, 2020, the Debtors filed second amended versions of the Plan and Disclosure Statement [Dkt. Nos. 262 and 263] (respectively, the “**Second Amended Plan**” and the “**Second Amended Disclosure Statement**”), along with blacklines against the First Amended Plan and First Amended Disclosure Statement.

PLEASE TAKE FURTHER NOTICE that on October 29, 2020, the Debtor filed a further revised Proposed Order [Dkt. No. 264] (the “**Further Revised Proposed Order**”) along

with further revised schedules (the “**Further Revised Schedules**”), and blacklines against the Revised Proposed Order and the Revised Schedules.

PLEASE TAKE FUTHER NOTICE that copies of the Second Amended Plan, the Second Amended Disclosure Statement, the Further Revised Proposed Order, the Further Revised Schedules, and blacklines of each of the foregoing, may be obtained from the Clerk’s Office of the United States Bankruptcy Court for the Northern District of New York, 455 Broadway, Albany, New York, 12207, or from the following website: <https://cases.omniagentsolutions.com/goodsamaritanhealth/>.

PLEASE TAKE FURTHER NOTICE that a telephonic hearing on the Disclosure Statement Motion shall be held on **October 30, 2020 at 11:00 a.m. (EST)**, before the Honorable Robert E. Littlefield, Jr. in the United States Bankruptcy Court for the Northern District of New York, at James T. Foley United States Courthouse, 445 Broadway, Albany, NY 12207 (the “**Hearing**”). Any parties wishing to participate in the Hearing should contact court staff to arrange for participation by telephone.

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Disclosure Statement Motion must be made in writing, filed with the Clerk of the Bankruptcy Court, and served upon the undersigned counsel to the Debtors, and (a) the Office of the United States Trustee for the Northern District of New York, 11A Clinton Avenue, Room 620, Albany, New York 12207, Attn: Lisa Penpraze and Amy J. Ginsberg; and (b) counsel for Debtors, Stradley Ronon Stevens and Young, LLP, 100 Park Avenue, Suite 2000, New York, NY 10017, Attn: Deborah A. Reperowitz and Daniel M. Pereira so as to actually be received by or before **October 29, 2020 at 4:00 p.m. (EST)**.

**IF NO OBJECTION OR RESPONSE TO THE MOTION IS TIMELY FILED,
SERVED AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE
BANKRUPTCY COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION
WITHOUT FUTURE NOTICE OR HEARING.**

Dated: October 29, 2020

Stradley Ronon Stevens & Young, LLP

By: /s/ Deborah A. Reperowitz _____

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