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*Counsel for the Plan Administrator*

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

In re:

SOUND SHORE MEDICAL CENTER OF  
WESTCHESTER, et al.

Chapter 11  
Case No. 13-22840 (RDD)

Debtors.

(Jointly Administered)

**MOTION OF THE PLAN ADMINISTRATOR  
FOR ENTRY OF AN ORDER EXTENDING THE DEADLINE TO FILE OBJECTIONS  
TO ADMINISTRATIVE, PRIORITY AND SECURED PROOFS OF CLAIM**

Monica Terrano, the Plan Administrator appointed in these cases, hereby submits this motion (the "Motion") to extend the deadline to object to the allowance of Administrative/Priority Claims and Secured Claims<sup>1</sup> (the "Claim Objection Deadline"). In support of the Motion, the Plan Administrator respectfully states as follows:

**JURISDICTION AND BACKGROUND**

1. The Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1334(b). Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409. The matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2).

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<sup>1</sup> Unless otherwise defined, capitalized terms used herein have the meanings ascribed to them in the Plan (as defined below).

2. On May 29, 2013 (the "Petition Date"), the Debtors filed with this Court voluntary petitions for relief under Chapter 11 of Title 11 of the United States Code (the "Bankruptcy Code") Pursuant to sections 1107 and 1108 of the Bankruptcy Code, the Debtors continued to administer their affairs. An official committee of unsecured creditors (the "Committee") was appointed on June 10, 2013 by the Office of the United States Trustee.

3. The factual background relating to the commencement of these Chapter 11 cases is set forth in detail in the Declaration of John Spicer pursuant to Local Bankruptcy Rule 1007-2 and in support of the First Day Motions, filed on the Petition Date and incorporated herein by reference.

4. On November 5, 2014, this Court entered an order (the "Confirmation Order") [Docket No. 908] confirming the Debtors' first amended plan of liquidation, dated September 17, 2014 (the "Plan") [Docket No. 821]. Pursuant to the Confirmation Order, Monica Terrano has been appointed as Plan Administrator. Pursuant to the Plan, the Plan Administrator has the authority, among other things, to object to claims on behalf of the Debtors' estates (the "Estates").

5. The Effective Date of the Plan was November 26, 2014. Pursuant to Section 9.1 of the Plan, the deadline to object to Administrative/Priority Claims and Secured Claims was set at the later of 60 days from the Effective Date or such date as established by the Court. There are 836 Administrative/Priority Claims and Secured Claims that have been filed against the Estates.

**RELIEF REQUESTED**

6. The Plan Administrator began reviewing Administrative/Priority Claims and Secured Claims prior to the Effective Date in her capacity as the Debtors' Chief Wind Down Officer. Since the Effective Date the Plan Administrator has continued to review and analyze Administrative/Priority Claims and Secured Claims in order to determine which of those claims may require an objection. As noted above, there are nearly 836 Administrative/Priority Claims and Secured Claims were filed against the Estates. The Plan Administrator has undertaken a systematic approach to reviewing and reconciling claims filed against the Estates, and is pleased to report that, as of the date of this Motion, approximately 256 Administrative/Priority Claims and Secured Claims have been resolved. Despite the progress made by the Plan Administrator, due to the sheer number of claims filed against the Estates, the Plan Administrator still has nearly 680 Administrative/Priority Claims and Secured Claims to reconcile. The Plan Administrator intends to try to resolve as many of the remaining Administrative/Priority Claims and Secured Claims as possible without having to file objections and engage in potentially unnecessary litigation, but requires more time to do so.

7. In addition, since the Plan established a Supplemental Administrative Claims Bar Date of January 12, 2015, the Plan Administrator has only had a limited amount of time to review any Administrative Claims filed in response to that bar date. Furthermore, the consensual resolution of Administrative/Priority Claims and Secured Claims would reduce the cost of pursuing claim objections and would therefore benefit all creditors.

8. Accordingly, the Plan Administrator requests an extension of the deadline to object to Administrative/Priority Claims and Secured Claims through and including April 30,

2015 to allow additional time to negotiate with creditors and to attempt to resolve such claims without the necessity of filing objections with the Court.

9. Notwithstanding the foregoing, the Plan Administrator intends to file objections to Administrative/Priority Claims and Secured Claims that cannot be resolved consensually on a rolling basis between now and the proposed extended deadline rather than filing all objections on the extended deadline.

10. Pursuant to Section 9.1 of the Plan, “[t]he filing of a motion to extend the deadline to object to any Claims shall automatically extend such deadline until a Final Order is entered on such motion.” As such, the Claim Objection Deadline shall be automatically extended until a Final Order is entered on this Motion.

#### **NOTICE**

11. Notice of this Motion has been given to the following parties or, in lieu thereof, to their counsel, if known: (a) the United States Trustee; (b) the Post Effective Date Committee; and (c) all those who have entered an appearance in these cases pursuant to Bankruptcy Rule 2002. The Plan Administrator respectfully submits that such notice is sufficient, and requests that, except as provided herein, the Court find that no further notice of the relief requested herein is required.

#### **NO PREVIOUS REQUEST**

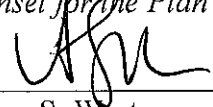
12. No previous request for the relief sought herein has been made to this or any other Court.

**CONCLUSION**

WHEREFORE, the Plan Administrator respectfully request that the Court enter an order substantially in the form annexed hereto as **Exhibit A** granting the relief requested herein and grant such other and further relief as the Court may deem just and proper.

Dated: Great Neck, New York  
February 12, 2015

GARFUNKEL WILD, P.C.  
*Counsel for the Plan Administrator*

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

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In re:

SOUND SHORE MEDICAL CENTER OF  
WESTCHESTER, et al.

Debtors.

Chapter 11  
Case No. 13-22840 (RDD)

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**NOTICE OF MOTION OF THE PLAN ADMINISTRATOR  
FOR ENTRY OF AN ORDER EXTENDING THE DEADLINE TO FILE OBJECTIONS  
TO ADMINISTRATIVE, PRIORITY AND SECURED PROOFS OF CLAIM**

**PLEASE TAKE NOTICE**, that Monica Terrano, the Plan Administrator appointed in the above-captioned cases, filed a motion (the "Motion") seeking the entry of an order extending the Plan Administrator's deadline to object to the allowance of Administrative/Priority Claims and Secured Claims<sup>1</sup> through and including April 30, 2015.

**PLEASE TAKE NOTICE**, that a hearing on the Motion will be held before the Honorable Robert D. Drain, United States Bankruptcy Judge for the Southern District of New York, 300 Quarropas Street, White Plains, New York 10601 on the 18<sup>th</sup> day of March 2015 at 10:00 o'clock in the forenoon of that day, or as soon thereafter as counsel can be heard, to

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<sup>1</sup> As such terms are defined in the Motion.

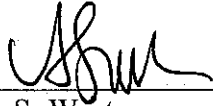
consider the entry of an Order approving the relief requested in the Motion and granting such other and further relief as is just and proper.

**PLEASE TAKE FURTHER NOTICE**, that objections, if any, to the relief requested in the Motion must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court for the Southern District of New York, and shall be filed with the Court electronically, by utilizing the Court's electronic case filing system at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov), or if the same cannot be filed electronically, by manually filing the same with the Clerk of the Court together with a cd-rom containing the same in word Format, with a hard copy provided to the Clerk's Office at the Court for delivery to the Chambers of the Honorable Robert D. Drain, and shall be served upon (i) Garfunkel Wild, P.C., 111 Great Neck Road, Great Neck, New York 11021, Attention: Burton S. Weston, Esq., Afsheen A. Shah, Esq. and Adam T. Berkowitz, Esq., counsel to the Plan Administrator; (ii) Alston & Bird LLP, 90 Park Avenue, New York, New York 10016 Attention: Martin G. Bunin, Esq. and Craig E. Freeman, Esq., counsel to the Committee; and (iii) the Office of the United States Trustee, 201 Varick Street, Room 1006, New York, New York 10014, Attention: Susan Golden, Esq., so as to be received by all such parties no later than March 11, 2015 at 4:00 p.m.

**PLEASE TAKE FURTHER NOTICE**, that if no objections are timely served and filed  
as set forth above, the relief requested in the Motion may be granted without further notice.

Dated: February 12, 2015

GARFUNKEL WILD, P.C.  
*Counsel for the Plan Administrator*

By:   
Burton S. Weston  
Afsheen A. Shah  
Adam T. Berkowitz  
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**Exhibit A**

**Proposed Order**

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

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In re:

SOUND SHORE MEDICAL CENTER OF  
WESTCHESTER, et al.

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Debtors.

Chapter 11  
Case No. 13-22840 (RDD)

(Jointly Administered)

**ORDER GRANTING MOTION  
OF THE PLAN ADMINISTRATOR FOR ENTRY OF AN  
ORDER EXTENDING THE DEADLINE TO FILE OBJECTIONS TO  
ADMINISTRATIVE, PRIORITY AND SECURED PROOFS OF CLAIM**

THIS MATTER having come before the Court upon the motion of the Plan Administrator appointed in these cases (the "Motion")<sup>1</sup> for entry of an order extending the deadline to object to the allowance of Administrative/Priority Claims and Secured Claims; and the Court having found that: (a) it has jurisdiction over the matters raised in the Motion pursuant to 28 U.S.C. §§ 157 and 1334(b); (b) this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); (c) venue is lying properly with this Court; (d) the relief requested in the Motion is in the best interests of the Estates and their creditors; (e) proper and adequate notice of the Motion and the hearing thereon has been given and that no other or further notice is necessary; and upon the record herein after due deliberation thereon, good and sufficient cause exists for the granting of the relief as set forth herein; it is hereby:

**ORDERED, ADJUDGED, AND DECREED THAT:**

1. The Motion is GRANTED in its entirety.

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<sup>1</sup> Unless otherwise defined, capitalized terms used herein shall have the meanings ascribed to them in the Motion

2. The deadline for the Plan Administrator to file objections to  
Administrative/Priority Claims and Secured Claims is extended through and including April 30,  
2015.

Dated: March \_\_\_\_\_, 2015  
New York, New York

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HONORABLE ROBERT D. DRAIN  
UNITED STATES BANKRUPTCY JUDGE