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Burton S. Weston  
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Adam T. Berkowitz

Hearing Date: August 4, 2105 at 10: 00 a.m. (Prevailing Eastern Time)  
Objection Deadline: July 28, 2015 at 4:00 p.m (Prevailing Eastern Time)

*Counsel for the Plan Administrator*

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

In re:

SOUND SHORE MEDICAL CENTER OF  
WESTCHESTER, et al.  
  
Debtors.

Chapter 11  
Case No. 13-22840 (RDD)  
(Jointly Administered)

**MOTION OF THE PLAN ADMINISTRATOR FOR ENTRY  
OF AN ORDER FURTHER 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).

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

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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).

“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 (the “Objection Deadline”). The Objection Deadline has since been extended to June 30, 2015 by Order of this Court dated May 20, 2015 [Docket No. 1071].

6. As indicated in the Plan Administrator’s prior requests to extend the Objection Deadline, approximately 836 Administrative/Priority Claims and Secured Claims have been filed against the Estates. The Plan Administrator and her advisors have been diligently reviewing and reconciling all such claims against the Debtors’ books and records. A substantial portion of the

claims have been resolved. In addition, there are several omnibus claims objections pending before this Court as to those claims which the Plan Administrator was unable to resolve prior to the Objection Deadline. Specifically, on June 29, 2015 the following omnibus claims objections (the "Omnibus Objections") were filed by the Plan Administrator solely with respect to the Administrative/Priority Claims and Secured Claims:

- (a) Plan Administrator's Fourth Omnibus Objection to Claims [Docket No. 1135];
- (b) Plan Administrator's Fifth Omnibus Objection to Claims [Docket No. 1136];
- (c) Plan Administrator's Sixth Omnibus Objection to Claims [Docket No. 1137];
- (d) Plan Administrator's Seventh Omnibus Objection to Claims [Docket No. 1138];
- (e) Claims Plan Administrator's Eighth Omnibus Objection to Claims [Docket No. 1139]; and
- (f) Plan Administrator's Ninth Omnibus Objection to Claims [Docket No. 1140].

7. While the vast majority of claims have either been resolved or are subject to the pending Omnibus Objections, there remain a few outstanding Administrative/Priority Claims and Secured Claims which are still being reconciled by the Plan Administrator. The Plan Administrator is hopeful these remaining claims will be resolved in the near term. However, pending the final reconciliation and resolution of all such claims, the Plan Administrator is seeking to further extend the Objection Deadline, so as to allow the parties sufficient time to conclude their ongoing discussions and negotiations in regards to the resolution of the claims.

#### **RELIEF REQUESTED**

8. The Plan Administrator has been meticulously reviewing Administrative/Priority Claims and Secured Claims since prior to the Effective Date of the Debtors' Plan, in her capacity as the Debtors' Chief Wind Down Officer. Since the Effective Date the Plan Administrator has

undertaken a systematic approach to further review and analyze all Administrative/Priority Claims and Secured Claims in order to determine which of those claims may require the filing of an objection. As noted above, nearly 836 Administrative/Priority Claims and Secured Claims were filed against the Estates. Since that date of the last extension, the Plan Administrator has continued reviewing and reconciling all Administrative/Priority and Secured claims filed against the Estates. As indicated above, the vast majority of the Administrative/Priority Claims and Secured Claims have either been resolved or are subject to the pending Omnibus Objections.

9. However, despite the progress made by the Plan Administrator in her review and analysis of the Administrative/Priority and Secured Claims, including the filing of six Omnibus Objections, there are some Administrative/Priority and Secured Claims which could not be fully reconciled or otherwise resolved prior to the Objection Deadline. While the Plan Administrator is hopeful these remaining claims will be resolved without any unnecessary litigation, to the extent a consensual resolution cannot be reached with the claimants, it may necessitate the filing of additional objections by the Plan Administrator.

10. Accordingly, the Plan Administrator requests an extension of the deadline to object to Administrative/Priority Claims and Secured Claims through and including December 31, 2015 to allow additional time to reconcile and resolve all such remaining claims and to the extent necessary, file any such additional required objections, as may be necessary, with the Court.

11. 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**

12. 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**

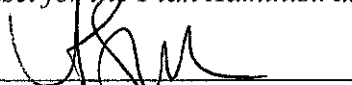
13. No previous request for the relief sought herein has been made to this or any other Court.

**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  
June 30, 2015

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

By:   
Burton S. Weston  
Afsheen A. Shah  
Adam T. Berkowitz  
111 Great Neck Road  
Great Neck, NY 11021

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

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**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 (f) 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:**

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

The deadline for the Plan Administrator to file objections to Administrative/Priority  
Claims and Secured Claims is extended through and including December 31, 2015.

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Afsheen A. Shah  
Adam T. Berkowitz

Hearing Date: August 4, 2105 at 10: 00 a.m. (Prevailing Eastern Time)  
Objection Deadline: July 28, 2015 at 4:00 p.m (Prevailing Eastern Time)

*Counsel for the Plan Administrator*

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

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In re:

SOUND SHORE MEDICAL CENTER OF  
WESTCHESTER, et al.

Chapter 11  
Case No. 13-22840 (RDD)

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(Jointly Administered)

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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 December 31, 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 4th day of August 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.

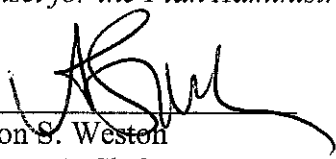
consider the entry of an Order approving the relief requested in the Motion and granting such other and further relief as is just and proper.

**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 July 28, 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: June 30, 2015

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

By:   
Burton S. Weston  
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