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Hearing Date: January 20, 2016 at 10:00 a.m. (Prevailing Eastern Time)
Objection Deadline: January 13, 2016 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)

**SECOND MOTION OF THE PLAN ADMINISTRATOR
FOR ENTRY OF AN ORDER EXTENDING THE DEADLINE
TO FILE OBJECTIONS TO UNSECURED PROOFS OF CLAIM**

Monica Terrano, the Plan Administrator appointed in these cases, hereby submits this second motion (the “Motion”) to extend the deadline to object to the allowance of Unsecured Claims¹ (the “Unsecured Claim Objection Deadline”) for a period of 180 days through and including April 28, 2016. 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).

¹ 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 continue 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 Plan Administrator was authorized to object to Unsecured Claims for up to one hundred eighty (180) days after the Effective Date. Approximately 1700 Unsecured Claims were filed against the Estates.

6. On May 21, 2015, the Plan Administrator filed her first motion to extend the deadline to object to the allowance of Unsecured Claims (the “First Extension Motion”). On June 11, 2015, the Court entered an order granting the First Extension Motion and setting

October 31, 2015 as the deadline for the Plan Administrator to object to Unsecured Claims (the “Objection Deadline”).

7. The Plan Administrator and her advisors have been diligently reviewing and reconciling all such claims against the Debtors’ books and records and have filed nine omnibus objections pertaining to the claims to date. [See Docket Nos. 1011, 1013, 1015, 1135, 1136, 1137, 1138, 1139, 1140].

RELIEF REQUESTED

8. By this Motion, the Plan Administrator seeks entry of an order extending the Objection Deadline for an additional 180 day period, through and including April 28, 2016, without prejudice to the rights of the Plan Administrator to seek further extensions of the Objection Deadline.

9. The Plan Administrator has been reviewing Unsecured Claims since prior to the Effective Date in her capacity as the Debtors’ Chief Wind Down Officer. Since the Effective Date the Plan Administrator has undertaken a systematic approach to review and analyze all filed Unsecured Claims in order to determine which of those claims may require an objection. As noted above, nearly 1700 Unsecured Claims were filed against the Estates, many of which were filed in unliquidated amounts.

10. Despite the tremendous efforts expended by the Plan Administrator to reconcile the filed claims to date, the Plan Administrator does not believe she can complete her review of the Unsecured Claims by the existing Objection Deadline. Although the Plan Administrator is continuing to review and reconcile the Unsecured Claims, she requires additional time to complete the ongoing and intensive reconciliation process. In addition, while the Plan

Administrator will seek to resolve as many disputed claims as possible on a consensual basis, it is anticipated that additional objections will be filed in conjunction with the Plan Administrator's ongoing review of the Unsecured Claims.

11. Accordingly, the Plan Administrator requests an extension of the deadline to object to Unsecured Claims through and including April 28, 2016 to allow additional time to reconcile and resolve all such remaining claims and to the extent necessary, file any required objections with the Court.

BASIS FOR RELIEF REQUESTED

12. Section 105(a) of the Bankruptcy Code provides that "the court may issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of [the Bankruptcy Code]." 11 U.S.C. § 105(a).

13. Bankruptcy Rule 9006(b) provides that the court may extend unexpired time periods, such as the Claims Objection Deadline, without notice:

[W]hen an act is required or allowed to be done at or within a specified period by these rules or by a notice given thereunder or by order of court, the court for cause shown may at any time in its discretion . . . with or without motion or notice order the period enlarged if the request therefor is made before the expiration of the period originally prescribed or as extended by a previous order. Fed. R. Bankr. P. 9006(b)(1).

14. In addition, under 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 Objection Deadline shall be automatically extended until a Final Order is entered on this Motion.

15. The Plan Administrator submits that cause exists to grant the extension sought herein. To date, approximately 1,700 proofs of claim have been filed against the Debtors' estates. Since the Effective Date, the Plan Administrator has worked diligently in (i) reviewing and analyzing the proofs of claim that have been filed; (ii) performing the required due diligence to determine the objectionable Unsecured Claims; and (iii) negotiating resolutions to certain of the Unsecured Claims.

16. Furthermore, as indicated above, the Plan Administrator has filed nine (9) non-substantive omnibus claim objections by which she has objected to over 400 claims. Orders granting the Plan Administrator's omnibus claim objections have been entered by the Court. [See Docket Nos. 1062, 1063, 1064, 1194, 1200, 1201, 1202, 1203, and 1204]. The Plan Administrator will continue to work diligently to resolve all outstanding claim objections and complete the claims reconciliation process. However, in light of the number of Unsecured Claims filed and the complexity of the task at hand, the Plan Administrator needs additional time to ensure that only valid, non-objectionable Unsecured Claims are allowed and that such claims are allowed in the correct amounts.

17. For these reasons, the Plan Administrator submits that extending the Objection Deadline through and including April 28, 2016, is necessary, prudent, and in the best interests of the Debtors' estate and creditors.

NOTICE

18. 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

19. 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
October 26, 2015

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

By: /s/ Adam T. Berkowitz
Burton S. Weston
Adam T. Berkowitz
Phillip Khezri
111 Great Neck Road
Great Neck, NY 11021
(516) 393-2200

**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)

**ORDER GRANTING SECOND MOTION
OF THE PLAN ADMINISTRATOR FOR ENTRY OF
AN ORDER EXTENDING THE DEADLINE TO FILE
OBJECTIONS TO UNSECURED PROOFS OF CLAIM**

THIS MATTER having come before the Court upon the motion of the Plan Administrator appointed in these cases (the “Motion”)¹ for entry of an order extending the deadline to object to the allowance of Unsecured 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:

The Motion is GRANTED in its entirety.

¹ 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 Unsecured Claims is extended through and including April 28, 2016.

Dated: _____, 2016
White Plains, New York

HONORABLE ROBERT D. DRAIN
UNITED STATES BANKRUPTCY JUDGE

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Debtors.

Chapter 11
Case No. 13-22840 (RDD)

(Jointly Administered)

**NOTICE OF SECOND MOTION OF THE PLAN ADMINISTRATOR
FOR ENTRY OF AN ORDER EXTENDING THE DEADLINE TO FILE OBJECTIONS
TO UNSECURED 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 Unsecured Proofs of Claims through and including April 28, 2016.

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 20th day of January 2016 at 10:00 o’clock in the forenoon of that day, or as soon thereafter as counsel can be heard, to 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, stating in detail the reasons therefor, and must be filed with the Clerk of the Bankruptcy Court, 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., Phillip Khezri, 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 January 13, 2016 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: October 26, 2016

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

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