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

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In re:

Chapter 11

SOUND SHORE MEDICAL CENTER  
OF WESTCHESTER, et al.

Case No. 13-22840(RDD)

Debtors.  
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**NOTICE OF CHAPTER 11 FILING AND OF FIRST DAY MOTIONS AND HEARING**

PLEASE TAKE NOTICE THAT:

1. On May 29, 2013, Sound Shore Medical Center of Westchester ("**SSMC**") and certain of its affiliates, as Chapter 11 debtors and debtors in possession (each a "**Debtor**" and collectively, the "**Debtors**")<sup>1</sup> filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code, in the United States Bankruptcy Court for the Southern District of New York (the "**Court**").

2. Together with their petitions, the Debtors also filed and requested a prompt hearing before the Court on May 31, 2013 at 10:00 a.m., Eastern Time (the "**Hearing**") on certain motions seeking first day relief (collectively, the "**First Day Motions**") listed on the Hearing agenda attached hereto as Exhibit A.

3. The Court scheduled a Hearing on May 31, 2013 at 10:00 a.m., Eastern Time, before the Honorable Robert D. Drain, United States Bankruptcy Judge, at 300 Quarropas Street, White Plains, New York 10601-4140 to consider the First Day Motions.

4. A copy of each of the First Day Motions can be viewed and obtained on the Court's website [www.ecf.nysb.uscourts.gov](http://www.ecf.nysb.uscourts.gov) or (without charge) at [www.gcginc.com/cases/soundshore](http://www.gcginc.com/cases/soundshore).

<sup>1</sup> The debtors in these chapter 11 cases, along with the last four digits of each debtor's federal tax identification number include: Sound Shore Health System, Inc. (1398), Sound Shore Medical Center of Westchester (0117), The Mount Vernon Hospital, Inc. (0115), Howe Avenue Nursing Home d/b/a Helen and Michael Schaffer Extended Care Center (0781), NRHMC Services Corporation (9137), The M.V.H. Corporation (1514) and New Rochelle Sound Shore Housing, LLC ( ). There are certain additional affiliates of the Debtors who are not debtors in these Chapter 11 Cases and have not sought relief under Chapter 11.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney if you have one in these bankruptcy cases. (If you do not have an attorney in these bankruptcy cases, 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 Hearing. **If you or your attorney do not attend the Hearing, the Court may grant the relief requested in the First Day Motions.**

Dated: Great Neck, New York  
May 29, 2013

GARFUNKEL WILD, P.C.

By: /s/ Burton S. Weston  
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*Proposed Attorneys for Debtors  
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**EXHIBIT A**

GARFUNKEL WILD, P.C.  
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UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In re:

Chapter 11

SOUND SHORE MEDICAL CENTER  
OF WESTCHESTER, et al.

Case No. 13-\_\_\_\_\_( )

Debtors.  
-----X

**FIRST DAY HEARING AGENDA**

Time and Date of Hearing:

May 31, 2013 at 10:00 a.m. (Eastern Time)

Location of Hearing:

Courtroom of the Honorable Robert D. Drain,  
United States Bankruptcy Court for the  
Southern District of New York, 300 Quarropas  
Street, White Plains, New York, New York,  
New York 10601-4140.

Copies of Motions:

A copy of each of the First Day Motions may  
be viewed on the Court's website at  
[www.ecf.nysb.uscourts.gov](http://www.ecf.nysb.uscourts.gov) or (without  
charge) at the Debtors' Information Website: at  
[www.gcginc.com/cases/soundshore](http://www.gcginc.com/cases/soundshore).

**I. Introduction and Background**

- A. Declaration of John Spicer Pursuant to Local Bankruptcy Rule 1007-2 and In Support of First Day Motions and Applications. [Docket No. 18]

**II. Financing Matters**

- A. **DIP Motion** - Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing Debtors to Incur Postpetition Indebtedness; (II) Granting Senior Security Interests and Superpriority Claims; (III) Authorizing the Debtors to Use Cash Collateral; (IV) Granting Adequate Protection; (V) Providing Related Relief; and (VI) Scheduling a Final Hearing [Docket No. 16]

- B. **Sale Motion** -- Debtors' *Ex Parte* Application for Entry of a Scheduling Order and Debtors' Motion for Entry of (I) An Order (A) Approving Bidding Procedures for the Sale of the Debtors' Real Estate and Designated Personal Property Assets, (B) Scheduling an Auction and a Sale Hearing Related Thereto, (C) Approving the form of Notice of Auction and Sale Hearing, (D) Approving a Break-Up Fee; and (II) An Order (A) Approving Such Sale of the Assets Free and Clear of Liens, Claims, Encumbrances and Other Interests, (B) The Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with Such Sale, (C) Allowing the Payment of Certain Valid Lien Claims and (D) Related Relief [Docket No. 17]

### III. **First Day Matters**

A. **Motion Regarding Employee Matters**

1. **Employee Wages/Benefits** - Motion of the Debtors for Entry of Interim and Final Orders Authorizing (I) Payment of Prepetition Wages, Employee Benefits and Expense Reimbursement, (II) Authorizing and Directing Banks to Honor Checks with Respect Thereto [Docket No. 11]

B. **Motions Regarding Business Operations**

1. **Insurance** - Motion of Debtors for Entry of Interim and Final Orders Under Sections 105(a) and 363(b) of the Bankruptcy Code, for an Order Authorizing the Debtor to (I) Continue its Existing Workers' Compensation Program, All Other Insurance Policies, Bonds and Related Agreements, and (II) Pay Certain Prepetition Insurance Premiums, Claims and Related Expenses. [Docket No. 13]
2. **Cash Management** - Motion for Final Order Authorizing Continued Use of the Debtors' (I) Cash Management System; (II) Bank Accounts; and (III) Business Forms [Docket No. 9]

C. **Motions Regarding Administrative and Procedural Matters**

1. **Joint Administration** - Motion of the Debtors for Entry of an Order Pursuant to Rule 1015(b) of the Federal Rules of Bankruptcy Procedure Directing Joint Administration of Chapter 11 Cases. [Docket No. 2]
2. **Extension for Schedules** - Motion of the Debtors for Entry of an Order Extending the Time to File Schedules and Statements of Financial Affairs. [Docket No. 4]
3. **Consolidated Lists** - Motion of the Debtors for Entry of an Order (A) Authorizing the Debtors to Prepare a List of Creditors in Lieu of a Formatted Mailing Matrix; (B) Authorizing The Debtors to File a

Consolidated List of the Debtors' 30 Largest Unsecured Creditors; and (C) Approving the Form and Manner of Notice of Commencement of the Debtors' Chapter 11 Cases. [Docket No. 5]

4. **GCG, Inc. Appointment** - Application of the Debtors to Employ and Retain GCG, Inc. as Notice and Claims Agent for the Debtors and Debtors in Possession Nunc Pro Tunc to the Petition Date. [Docket No. 6]
5. **Case Management** - Motion of the Debtors for Entry of an Administrative Order Establishing Case Management Procedures. [Docket No. 7]
6. **Notice Procedures** - Motion of the Debtors for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals. [Docket No. 12]

D. **Other**

1. **Case Conference** - Notice of Proposed Order Scheduling Initial Case Conference [Docket No. 3]

Dated: Great Neck, New York  
May 29, 2013

GARFUNKEL WILD, P.C.

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