

GARFUNKEL WILD, P.C.
111 Great Neck Road
Great Neck, New York 11021
Telephone: (516) 393-2200
Telefax: (516) 466-5964
Burton S. Weston
Afsheen A. Shah
*Proposed Counsel for the Debtors
and Debtors in Possession*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In re:

SOUND SHORE MEDICAL CENTER OF
WESTCHESTER, et al.

Chapter 11
Case No. 13-_____ (____)

Debtors.

(Joint Administration Pending)

-----X

**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**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

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")¹ in the above-referenced Chapter 11 cases (the "Chapter 11 Cases"), hereby move (the "Motion") 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' thirty (30) largest unsecured creditors; and (c) approving the form and manner of notice

¹ 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 (0117). 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.

of commencement of the Debtors' Chapter 11 Cases. In support of the Motion, the Debtors rely upon the Affidavit of John Spicer Pursuant to Local Bankruptcy Rule 1007-2 and in Support of First Day Motions and Applications (the "**Spicer Affidavit**"), and respectfully represent as follows:

JURISDICTION AND VENUE

1. This Court has jurisdiction over the Motion pursuant to 28 U.S.C. §§ 157 and 1334. The Motion is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A).
2. Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.
3. The statutory predicates for the relief requested herein are sections 105(a), 342(a) and 521 of title 11 of the United States Code (the "**Bankruptcy Code**") and Rules 1007(a)(1) and (d) and 2002(a), (f), and (1) of the Federal Rules of Bankruptcy Procedure (the "**Bankruptcy Rules**").

GENERAL BACKGROUND

4. On the date hereof (the "**Petition Date**"), each Debtor filed a voluntary petition for relief under Chapter 11 of the Bankruptcy Code. The Debtors have requested that the Chapter 11 Cases be jointly administered for procedural purposes only.
5. The Debtors are operating their business as debtors in possession pursuant to sections 1107 and 1108 of the Bankruptcy Code. No trustee, examiner, or official committee of unsecured creditors has been appointed.

THE DEBTORS' HISTORY AND BUSINESS

6. The factual background regarding the Debtors, including their current and historical business operations which precipitated the filing of these Chapter 11 Cases, are set forth in detail in the Spicer Affidavit. In the interest of brevity, the facts and statements set forth in the Spicer Affidavit are incorporated herein by reference.

FACTS RELEVANT TO THE MOTION

7. There are seven Debtor entities involved in these Chapter 11 Cases which, according to their most recent unaudited financial statements as of December 31, 2012, hold an aggregate of approximately \$159.63 million in assets and approximately \$200 million in liabilities. The Debtors estimate that, in the aggregate, they have over 3000 creditors on a consolidated basis.

8. Contemporaneously with the filing of this Motion, and in accordance with General Order M-192, the Debtors have filed an application to retain GCG, Inc. ("**GCG**") as their notice and claims agent in these Chapter 11 Cases ("**Proposed Claims and Noticing Agent**"). If that motion is granted, GCG will, among other things (a) assist with the consolidation of the Debtors' computer records into a creditor database and prepare creditor lists; (b) mail notices to the parties in such database, including, without limitation, the notice of commencement of these Chapter 11 Cases; and (c) undertake any other mailings directed by the Court, United States Trustee for the Southern District of New York ("**U.S. Trustee**"), or as required by the Bankruptcy Code or Bankruptcy Rules. The Debtors believe that using GCG for this purpose will maximize administrative efficiency in these Chapter 11 Cases and reduce the administrative burdens that would otherwise fall upon the Court, the Clerk's Office and the U.S. Trustee.

9. After consulting with GCG, the Debtors believe that preparing the consolidated list in the format or formats currently maintained by the Debtors in the ordinary course of business will be sufficient to permit GCG to promptly provide notices to all appropriate parties. Accordingly, the Debtors believe that maintaining their lists of creditors in electronic format rather than preparing and filing separate matrices will maximize efficiency, increase accuracy, and reduce costs to the benefit of the estates.

RELIEF REQUESTED

10. Pursuant to sections 105(a), 342(a), and 521 of the Bankruptcy Code, the Debtors seek entry of an order in substantially the form annexed hereto as Exhibit A (a) authorizing the Debtors to prepare a consolidated list of creditors in the format or formats currently maintained in the ordinary course of business in lieu of submitting any required mailing matrix; (b) authorizing the Debtors 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.

BASIS FOR RELIEF REQUESTED

Cause Exists to Authorize the Debtors to Prepare a List of Creditors in Lieu of Submitting a Formatted Mailing Matrix

11. Unless a debtors' schedules of assets and liabilities are filed simultaneously with a Chapter 11 petition, section 521(a) of the Bankruptcy Code, Bankruptcy Rule 1007(a)(1), and Local Bankruptcy Rule 1007-2 require a debtor to file a list containing the name and address of each creditor. In addition, Bankruptcy Rule 1007(d) requires a debtor to file a list containing the name, address, and claim of the creditors holding the 20 largest unsecured claims against the debtor. Bankruptcy Rule 2002(a)(1) further provides that the clerk (or other person directed by the court) must give the debtor, trustee, all creditors and any indenture trustee at least 21 days

notice by mail of the meeting of creditors under section 341 of the Bankruptcy Code (the “341 Meeting”). Bankruptcy Rule 2002(f)(1) also provides that notice of “the order of relief” shall be sent by mail to all creditors.

12. Permitting the Debtors’ Proposed Claims and Noticing Agent to maintain a consolidated list of their creditors in electronic format only, in lieu of filing a creditor matrix, is warranted under the circumstances of these Chapter 11 Cases. Because the Debtors have thousands of creditors, converting the Debtors’ computerized information to a format compatible with the matrix requirements would be an exceptionally burdensome task and would greatly increase the risk of error with respect to information already intact on computer systems maintained by the Debtors or their agents.

13. In light of the foregoing, the Debtors submit that proposed maintenance of an electronic list of creditors by their Proposed Claims and Noticing Agent is warranted under the facts and circumstances present here, consistent with the applicable provisions of the Local Rules and, indeed, similar to relief routinely granted in comparable Chapter 11 cases in this district. See, e.g., In re Saint Vincents Catholic Medical Centers, et al., Case No. 10-11943 (CGM)(Bankr. S.D.N.Y. April 14, 2010); In re The Reader’s Digest Ass’n, Inc., Case No. 09-23529 (RDD) (Bankr. S.D.N.Y. Aug. 25, 2009); In re ION Media Networks, Inc., Case No. 09-13125 (JMP) (Bankr. S.D.N.Y. May 21, 2009); In re Chemtura Corp., Case No. 09-11233 (REG) (Bankr. S.D.N.Y. Apr. 1, 2009); In re Tronox Inc., Case No. 09-10156 (ALG) (Bankr. S.D.N.Y. Jan 13, 2009); In re Bally Total Fitness of Greater New York, Inc., 08-14818 (BRL) (Bankr. S.D.N.Y. Dec. 9, 2008); In re Dana Corp., Case No. 06-10354 (BRL) (Bankr. S.D.N.Y. Mar. 6, 2006).

Cause Exists to Authorize the Debtors to File a Single, Consolidated Creditor List

14. Bankruptcy Rule 1007(d) provides that a debtor shall file “a list containing the name, address, and claim of the creditors that hold the 20 largest unsecured claims, excluding insiders.” Fed. R. Bankr. P. 1007(d). Because many creditors hold claims against multiple Debtors and the Debtors generally operate as a single business enterprise, the Debtors request authority to file a single, consolidated list of their thirty (30) largest general unsecured creditors.

15. Because the top 20 creditor lists of several of the Debtors would overlap, and certain other Debtors may have fewer than 20 identifiable unsecured creditors, the Debtors submit that filing separate top 20 lists would be of limited utility and unnecessarily burdensome to the Debtors. Requiring the Debtors to compile and file separate top 20 creditor lists for each individual Debtor would consume an excessive amount of the Debtors’ time and resources, otherwise needed for the day-to-day operations of the Debtors. Further, the Debtors believe a single, consolidated list of the Debtors’ 30 largest unsecured, non-insider creditors will aid the U.S. Trustee in its efforts to communicate with these creditors.

16. Accordingly, the Debtors submit that filing a consolidated list of their 30 largest unsecured creditors is appropriate under the facts and circumstances present here, consistent with the applicable provisions of the Local Rules and, indeed, similar to relief routinely granted in comparable Chapter 11 cases in this district. See, e.g., In re The Reader’s Digest Ass’n, Inc., Case No. 09-23529 (RDD) (Bankr. S.D.N.Y. Aug. 25, 2009); In re ION Media Networks, Inc., Case No. 09-13125 (JMP) (Bankr. S.D.N.Y. May 21, 2009); In re Chemtura Corp., Case No. 09-11233 (REG) (Bankr. S.D.N.Y. Apr. 1, 2009); In re Tronox Inc., Case No. 09-10156 (ALG) (Bankr. S.D.N.Y. Jan 13, 2009); In re Bally Total Fitness of Greater New York, Inc., 08-14818

(BRL) (Bankr. S.D.N.Y. Dec. 9, 2008); In re Dana Corp., Case No. 06-10354 (BRL) (Bankr. S.D.N.Y. Mar. 6, 2006).

The Form and Manner of the Commencement Notice Should be Approved

17. Bankruptcy Rule 2002(f) provides that the initial notice of the order for relief (the “**Commencement Notice**”) must be mailed to all creditors. Furthermore, Bankruptcy Rule 2002(a)(1) provides that the clerk, or some other person as the court may direct, shall give the debtor, the trustee, all creditors and indenture trustee at least 21 days notice by mail of the meeting of creditors under § 341 or § 1104(b) of the Code. The Debtors request authority for GCG to serve the Commencement Notice, substantially in the form of Official Bankruptcy Form 9 (for Chapter 11 Cases)² by regular mail, postage prepaid, on those entities entitled to receive such notice no later than five business days after the Debtors receive notice from the U.S. Trustee of the time and place of the 341 Meeting.

18. As stated above, the Debtors propose that GCG undertake all mailings directed by the Court, the U.S. Trustee, or as required by the Bankruptcy Code and Bankruptcy Rules, including, without limitation, the Commencement Notice. GCG’s assistance with mailing and preparation of creditors lists and notices will ease administrative burdens that otherwise would fall upon the Court, the Clerk’s Office and the U.S. Trustee. With such assistance, the Debtors will be prepared to file a computer-readable consolidated list of creditors and also will be capable of undertaking all necessary mailings.

² The Debtors have not yet established a bar date for the filing of proofs of claim in these Chapter 11 Cases. Accordingly, the Commencement Notice will not include a notice of the bar date.

NOTICE

19. No trustee, examiner, or creditors' committee has been appointed in these Chapter 11 Cases. Notice of this Motion has been given to: (a) United States Trustee; (b) the Debtors' material prepetition and postpetition secured lenders or any agent therefore; (c) the holders of the 30 largest unsecured claims on a consolidated basis; (d) the following state and local taxing and regulatory authorities: (i) the Centers for Medicare and Medicaid Services, (ii) the New York State Department of Health, (iii) the United States Attorney for the Southern District of New York, (iv) the Attorney General of the State of New York; (v) the Westchester County Attorney; (vi) the New Rochelle City Attorney, (vii) the Internal Revenue Service; (viii) the New York State Department of Taxation and Finance; (e) counsel to MMC; (f) the United States Department of Justice, Commercial Litigation; (g) the United States Department of Health and Human Services; and (h) all parties in interest who have requested notice pursuant to Bankruptcy Rule 2002. The Debtors submit that no other notice need be given..

NO PREVIOUS REQUEST

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

WHEREFORE, the Debtors respectfully request that the Court enter an order granting the relief requested and such other or further relief as is just.

Dated: May 29, 2013
Great Neck, New York

GARFUNKEL WILD, P.C.

By: 

Burton S. Weston

Afsheen A. Shah

111 Great Neck Road

Great Neck, NY 11021

Telephone: (516) 393-2200

Facsimile: (516) 466-5964

*Proposed Attorneys for the Debtors
and Debtors in Possession*

EXHIBIT A

Proposed Form of Order

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In re:
SOUND SHORE MEDICAL CENTER
OF WESTCHESTER, *et al.*
Debtors.
-----X

Chapter 11
Case No. 13-_____()

**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**

Upon the Motion (the "**Motion**")¹ of 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**")² in the above-referenced Chapter 11 cases (the "**Chapter 11 Cases**") 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; and the Court having subject matter jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. § 1334 and the Standing Order of Referral of Cases to Bankruptcy Court Judges of the District Court for the Southern District of New York, dated July 10, 1984 (Ward, Acting C.J.); and the Motion being a core proceeding under 28 U.S.C. § 157(b); and venue being proper before the Court

¹ Capitalized terms used but not defined herein shall have the same meanings ascribed to them in the Motion.

² 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.

pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided as set forth in the Motion; and no other or further notice needing to be provided; and the relief requested in the Motion being in the best interests of the Debtors and their estates and creditors; and the Court having reviewed the Motion; and upon the record of the hearing before the Court (the "Hearing"); and the Court having determined that the legal and factual bases set forth in the Motion, the Spicer Affidavit, and at the Hearing establish just cause for the relief granted herein; and upon all of the proceedings had before the Court; and after due deliberation and sufficient cause appearing therefore,

IT IS HEREBY ORDERED THAT:

1. The Motion is granted to the extent provided herein.
2. The Debtors are authorized to file a consolidated list of their 30 largest unsecured creditors in lieu of each Debtor filing a list of its 20 largest unsecured creditors.
3. In lieu of submitting a formatted mailing matrix, as soon as practicable after entry of an order authorizing the engagement of GCG, Inc. ("GCG") as claims and noticing agent in these Chapter 11 Cases, the Debtors shall furnish to GCG a consolidated list containing the names and last known addresses of the Debtors' creditors.
4. The Debtors, with the assistance of GCG, are hereby authorized and directed to mail the Commencement Notice to the Debtors' creditors no later than five business days after the Debtors receive written notice from the United States Trustee of the time and place of the Section 341 Meeting.
5. The Debtors, with the assistance of GCG (upon this Court's authorization to engage GCG as the Debtors' notice and claims agent), shall undertake all other mailings directed by the Court, the United States Trustee, or as required by the Bankruptcy Code,

including, without limitation, the notice of commencement of the Chapter 11 Cases and any other correspondence that the Debtors may wish to send to creditors.

6. The Debtors are authorized and empowered to take all actions necessary to implement the relief granted in this Order.

Dated: May____, 2013
White Plains, New York

THE HONORABLE ROBERT D. DRAIN
UNITED STATES BANKRUPTCY JUDGE

EXHIBIT B

Proposed Commencement Notice

GARFUNKEL WILD, P.C.
111 Great Neck Road
Great Neck, NY 11021
(516) 393-2200 (phone)
(516) 466-4964 (fax)
Burton S. Weston, Esq.
Afsheen A. Shah, Esq.

Proposed Counsel for Debtors and Debtors in Possession

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

-----X

In re:

SOUND SHORE MEDICAL CENTER
OF WESTCHESTER, et al.,

Chapter 11
Case No. 13-_____ ()

Debtors.

(Joint Administration Pending)

-----X

**NOTICE OF COMMENCEMENT OF CHAPTER 11
BANKRUPTCY CASES, MEETING OF CREDITORS AND DEADLINES**

Commencement of Chapter 11 Cases. On May 29, 2013, the debtors listed below (collectively, the "**Debtors**") filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code (the "**Bankruptcy Code**") in the United States Bankruptcy Court for the Southern District of New York (the "**Bankruptcy Court**").

Debtor	Case Number	Tax ID Number
Sound Shore Health System, Inc	13-xxxxx	XX-XXX1398
Sound Shore Medical Center of Westchester	13-xxxxx	XX-XXX0117
The Mount Vernon Hospital, Inc.	13-xxxxx	XX-XXX0115
Howe Avenue Nursing Home d/b/a Helen and Michael Schaffer Extended Care Center	13-xxxxx	XX-XXX0781
NRHMC Services Corporation	13-xxxxx	XX-XXX9137
The M.V.H. Corporation.	13-xxxxx	XX-XXX1514
New Rochelle Sound Shore Housing, LLC	13-xxxxx	XX-XXX0117

Joint Administration of Cases. On May ___, 2013, the Bankruptcy Court entered an order authorizing joint administration of the Debtors' chapter 11 cases pursuant to Rule 1015 of the Federal Rules of Bankruptcy Procedure (the "**Bankruptcy Rules**") and consolidating the chapter 11 cases for procedural purposes only under the joint caption *Sound Shore Medical Center of Westchester, et al.*, Case No. 13-_____ ().

Section 341 Meeting of Creditors. The Debtors' representative, as specified in Rule 9001(5) of the Bankruptcy Rules, is required to appear at the meeting of creditors on the date and at the place set forth below for the purpose of being examined under oath. **ATTENDANCE BY CREDITORS AT THE MEETING IS WELCOMED, BUT NOT REQUIRED.** At the meeting, creditors may examine the Debtors and transact such other business as may properly come before the meeting. The meeting may be continued or adjourned from time to time by

notice at the meeting, without further written notice to the creditors. The meeting will take place [] at [] (prevailing Eastern Time) at the at the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, Suite 2100, New York, New York 10004.

Deadline for Filing Proofs of Claim. Schedules of creditors will be filed pursuant to Bankruptcy Rule 1007 and any extensions thereto approved by the Bankruptcy Court. A creditor holding a scheduled claim which is not listed as disputed, contingent, or unliquidated, may, but is not required, to file a proof of claim in these cases. A proof of claim is a written statement setting forth a creditor's claim. A creditor whose claim is not scheduled or whose claim is listed as disputed, contingent, or unliquidated must file a proof of claim by a Court-established deadline (the "**Bar Date**"). Separate notice of the Bar Date (the "**Bar Date Notice**") will be mailed separately and published as required by the Court. The Bar Date in these cases has not yet been set. The Bar Date Notice will contain information regarding the deadline for filing a proof of claim, a proof of claim form, and instructions for completing and filing a proof of claim form. Proof of claim forms are also available at the Bankruptcy Court Clerk's Office at the address listed on the following page or the Court's website at www.nysb.uscourts.gov/forms and will be available on the website maintained by the Debtors' claims agent at www.gcgin.com/cases/soundshore. Completed proof of claim forms should be mailed to:

If by first class mail:	If by hand delivery or overnight mail:
Sound Shore Medical Center of Westchester c/o GCG, Inc. PO Box 9982 Dublin, OH 43017-5982	Sound Shore Medical Center of Westchester c/o GCG, Inc. 5151 Blazer Parkway, Suite A Dublin, Ohio 43017

Chapter 11 Plan. Chapter 11 allows a debtor to reorganize or liquidate pursuant to a plan. A plan is not effective unless confirmed by the court. You may be sent a copy of the plan and a disclosure statement telling you about the plan, and you might have the opportunity to vote on the plan. You will be sent notice of the date of the confirmation hearing, and you may object to confirmation of the plan and attend the confirmation hearing. Unless a trustee is serving, the debtor will remain in possession of the debtor's property and may continue to operate any business.

Discharge of Debts. In accordance with section 1141(d) of the Bankruptcy Code, confirmation of a chapter 11 plan may result in a discharge of debts, which may include all or part of your debt. A discharge means that you may never try to recollect the debt from the Debtors, except as provided in the chapter 11 plan.

Creditors May Not Take Certain Actions. Pursuant to section 362(a) of the Bankruptcy Code, the filing of a bankruptcy petition automatically stays certain collection and other actions against the Debtors' and the Debtors' property. Prohibited actions are listed in detail in section 362(a) of the Bankruptcy Code. If unauthorized actions are taken by a creditor against the Debtors, the Bankruptcy Court may penalize that creditor. A creditor who is considering taking action against the Debtors or their property should review, among other

things, section 362(a) of the Bankruptcy Code and seek legal advice from their own independent counsel.

Case Management Procedures Order. On May __, 2013, the Bankruptcy Court entered an order that, among other things, establishes the scope of notice to be given in connection with certain proceedings in these chapter 11 cases (the "**Case Management Order**"). The Case Management Order is available on the website maintained by the Debtors' claim agent at www.gcginc.com/cases/soundshore.com. The Case Management Order provides, among other things, that notices of most motions, applications and similar moving papers, together with any supporting memoranda of law in these chapter 11 cases need only be served via electronic mail ("**Email**") to both the ("**Master Service List**") parties, as delineated in the Case Management Order, as well as those requesting notice under Bankruptcy Rule 2002 ("**General Service List**") parties), who have filed a written request to the Court, including the (i) name, organization (if any); (ii) full street address; (iii) name of client(s), if applicable; (iv) telephone number; (v) facsimile number; and (vi) Email address. This request must also been served upon both counsel to the Debtors and to the Debtors' Claims and Noticing Agent. In addition, the Master Service List parties will also receive notice of the relevant pleadings via first class mail or via overnight mail in addition to email. All known parties in interest will receive notice of certain proceedings, including the Bar Date, the time fixed for filing objections to and any hearing to consider a disclosure statement and/or chapter 11 plan, and dismissal or conversion of the chapter 11 cases to another chapter of the Bankruptcy Code.

How to Obtain Documents. Electronic copies of all pleadings or other documents filed in these chapter 11 cases may be obtained for a fee via PACER on the Bankruptcy Court's website at www.nysb.uscourts.gov. Free electronic copies of all pleadings and certain other documents filed in these chapter 11 cases are posted at the website maintained by the Debtors' claim agent at www.gcginc.com/cases/soundshore.

Legal Advice. Neither the Debtors' lawyers nor the Bankruptcy Court Clerk's Office can provide you with legal advice. Nothing herein should be construed as legal advice and all summaries of documentation are for your convenience only and qualified in all respects by the documents referenced herein. Should you require legal advice, you may wish to consult an attorney to protect your rights.

Contact Information.

Debtors' Case Information Hotline
Toll-Free: (866) 300-1288
Email: SoundShoreInfo@gcginc.com

United States Bankruptcy Court, Southern District of New York	
<u>Address</u> US Bankruptcy Court Southern District of New York 300 Quarropas Street Room 248 White Plains, NY 10601	<u>Clerk of the Court</u> Hours 8:30 a.m. – 5:00 p.m. (weekdays only) Telephone (914) 390-4180

Proposed Counsel for the Debtors
GARFUNKEL WILD, P.C 111 Great Neck Road Great Neck, NY 11021 (516) 393-2200 (phone) (516) 466-4964 (fax) Burton S. Weston, Esq Afsheen A. Shah, Esq.

Dated: May 28, 2013