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Counsel for the Debtors and Debtors-in-Possession

Hearing Date: September 16, 2014 at 10:00 a.m. (Eastern Time) Objection Deadline: September 11, 2014 at 4:00 p.m. (Eastern Time)

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)

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NOTICE OF HEARING ON MOTION FOR ENTRY OF AN ORDER, <u>INTER ALIA</u>, APPROVING DISCLOSURE STATEMENT, SCHEDULING HEARING ON CONFIRMATION OF PLAN AND ESTABLISHING DEADLINE FOR FILING OBJECTIONS TO CONFIRMATION

PLEASE TAKE NOTICE that on August 18, 2014, Sound Shore Medical Center of Westchester ("SSMC" or "Debtor") and certain of its affiliates, as Chapter 11 debtors and debtors in possession herein (each a "Debtor" and collectively the "Debtors")¹, filed the Disclosure Statement Pursuant to Section 1125 of the Bankruptcy Code, for Plan of Liquidation Under Chapter 11 of the Bankruptcy Code of Sound Shore Medical Center of Westchester, et al. (as may be amended, modified or supplemented the "Disclosure Statement"), [Docket No.798]. The Debtors submitted the Disclosure Statement pursuant to section 1125 of the Bankruptcy

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 (0115), Howe Avenue Nursing Home, Inc., d/b/a Helen and Michael Schaeffer 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 and have not sought relief under Chapter 11.

Code for use in the solicitation of votes on the Debtors' Plan of Liquidation Under Chapter 11 of the Bankruptcy Code of Sound Shore Medical Center of Westchester, *et al.* (as may be amended, modified or supplemented, including the Plan Supplement and all other exhibits and schedules, the "Plan") [Docket No. 799] a copy of which was also filed with the Court on August 18, 2014. Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Plan or Disclosure Statement, as the context so requires.

PLEASE TAKE FURTHER NOTICE that a hearing currently is scheduled before the Honorable Robert D. Drain, United States Bankruptcy Judge for the Southern District of New York, at the United States Bankruptcy Court, Southern District of New York, 300 Quarropas Street, White Plains, New York 10601, for 10:00 a.m. (Prevailing Eastern Time) on September 16, 2014, or as soon thereafter as counsel can be heard, to consider, among other things, the entry of an Order (i) approving the Disclosure Statement, (ii) scheduling a hearing (the "Confirmation Hearing"); (iii) establishing procedures for the solicitation and tabulation of votes to accept or reject the Plan, including: (a) approving the form and manner of the solicitation packages to be sent to parties in interest in these cases, (b) approving the form and manner of notice of the Confirmation Hearing, (c) establishing a voting record date and approving procedures for the distribution of solicitation packages, (d) approving the form of ballots, (e) establishing a voting deadline for receipt of ballots, and (f) approving procedures for tabulating acceptances and rejections of the Plan; (iv) establishing notice and objection procedures for the confirmation of the Plan, and (v) granting such other and further relief as is just and proper. The Debtors will file and serve a motion seeking approval of the Order (the "Motion") with the Court on or before August 18, 2014, consistent with the Order Establishing Case Management and Scheduling Procedures (the "Case Management Order"), approved on June 3, 2013 [Docket No. 50].

PLEASE TAKE FURTHER NOTICE, that objections, if any, to the adequacy of the Disclosure Statement and the Motion shall be made in writing, shall state with particularity the grounds for the objection, and shall be and filed with the Bankruptcy Court, in electronic format, by utilizing the Court's electronic case filing system at www.nysb.uscourts.gov, or if the same cannot be filed electronically, by manually filing same with the Clerk of the Court together with a cd-rom containing same in Word, Wordperfect or pdf format, with a hard copy provided to the Clerk's Office at the Bankruptcy Court for delivery to the Chambers of the Honorable Robert D. Drain and 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 for the Debtors; (ii) Alston & Bird, LLP, 90 Park Avenue, New York, New York 10016, Attn: Martin G. Bunin, Esq., counsel to the official committee of unsecured creditors; (iii) MidCap Financial, LLC, 7255 Woodmont Avenue, Suite 200, Bethesda, MD 20814, attention: Lisa J. Lenderman, Esq., Deputy General Counsel, counsel to Debtors' postpetition lender; (iv) Togut, Segal and Segal, One Penn Plaza, New York, New York 10119, attention Frank Oswald, Esq., and Scott Griffin, Esq, counsel to Montefiore Medical Center; and (v) Office of the United States Trustee, 201 Varick Street, Room 1006, New York, New York 10014, Attn: Susan Golden, Esq., so as to be received no later than September 11, 2014 at 4:00 p.m.

PLEASE TAKE FURTHER NOTICE that only those objections that are timely filed, served and received will be considered at the Disclosure Statement Approval Hearing. Failure to file a timely objection may result in entry of a final order approving the Disclosure Statement and the Motion as requested by the Debtors without further notice.

PLEASE TAKE FURTHER NOTICE that copies of the Disclosure Statement and Plan may be obtained (i) from the Debtors' Claims and Voting Agent GCG, Inc. (a) at the Debtors'

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restructuring website at http://cases.gcginc.com/soundshore/, (b) upon request by electronic mail to SoundShoreInfo@gcginc.com or (c) upon request by calling the Debtors' restructuring hotline at (866) 300-1288, or (ii) for a fee via PACER at https://ecf.nysb.uscourts.gov/.

PLEASE TAKE FURTHER NOTICE that the hearing on the Motion may be adjourned without further notice except as announced in open court on the Hearing Date, or at any adjourned hearing.

Dated: Great Neck, New York August 18, 2014

Respectfully submitted,

Burton S. Weston Afsheen A. Shah Adam T. Berkowitz

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