

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:

SOUTH HILLS OPERATIONS, LLC *et al.*,¹

Debtors.

Chapter 11

Bankruptcy Case No. 24-21217-CMB

ROBERT S. BERNSTEIN, as Liquidating
Trustee,

Movant,

Related Doc. No.: 1473, 1565, 1572

v.

NON-COMPLIANT ADMINISTRATIVE
CLAIMANTS IDENTIFIED ON
SCHEDULE 1 TO EXHIBIT A ATTACHED
HERETO,

Respondent.

**MOTION OF THE LIQUIDATING TRUSTEE FOR AN ORDER
DISALLOWING AND EXPUNGING ADMINISTRATIVE CLAIMS DUE TO
ADMINISTRATIVE CLAIMANTS' FAILURE TO PROVIDE THE LIQUIDATING
TRUSTEE WITH IRS W-9 FORMS**

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number are: South Hills Operations, LLC (5527); Monroeville Operations, LLC (3280); Mt. Lebanon Operations, LLC (1133); Murrysburg Operations, LLC (9149); Cheswick Rehabilitation and Wellness Center, LLC (9561); 3876 Saxonburg Boulevard Propco, LLC (3618); North Strabane Rehabilitation and Wellness Center, LLC (1677); 100 Tandem Village Road Propco, LLC (1918); Maybrook-C Briarcliff Opco, LLC (5187); Maybrook-C Briarcliff Propco, LLC (1823); Maybrook-C Evergreen Opco, LLC (5388); Maybrook-C Evergreen Propco, LLC (2000); Maybrook-C Kade Opco, LLC (4033); Maybrook-C Kade Propco, LLC (2097); Maybrook-C Latrobe Opco, LLC (4148); Maybrook-C Latrobe Propco, LLC (2178); Maybrook-C Overlook Opco, LLC (7081); Maybrook-C Overlook Propco, LLC (6804); Maybrook-C Silver Oaks Opco, LLC (7146); Maybrook-C Silver Oaks Propco, LLC (9654); Maybrook-C Whitecliff Opco, LLC (6211); Maybrook-C Whitecliff Propco, LLC (4835). The Debtors' address is 485 Lexington Avenue, 10th Floor, New York, NY 10017.

THIS MOTION SEEKS TO ALTER YOUR RIGHTS AND AFFECT ANY DISTRIBUTION TO WHICH YOU OTHERWISE MAY BE ENTITLED UNDER THE TERMS OF THE PLAN. THE LIST OF AFFECTED ADMINISTRATIVE CLAIMS IS ATTACHED AS EXHIBIT A TO THE PROPOSED ORDER. YOU SHOULD REVIEW THIS MOTION CAREFULLY.

IF YOU HAVE ANY QUESTIONS, PLEASE CONTACT THE LIQUIDATING TRUSTEE'S COUNSEL, MASON S. SHELTON, ESQ. AT (412) 456-8163 OR MSHELTON@BERNSTEINLAW.COM

Robert S. Bernstein, solely in his capacity as the Liquidating Trustee of the South Hills Operations, LLC, *et al.* Liquidating Trust (the “Liquidating Trustee”), successor in interest to the estate of South Hills Operations, LLC *et al.* (the “Debtors”), the debtors in the above-captioned chapter 11 case (the “Chapter 11 Case”), through their undersigned counsel, submits this motion (this “Motion”), pursuant to section 105(a) of title 11 of the United States Code (the “Bankruptcy Code”), disallowing the administrative claims listed on Exhibit A of the proposed order amended hereto as Schedule 1 due to the failure of the holders of such claims to provide the Liquidating Trustee with a completed *Request for Taxpayer Identification Number and Certification*, I.R.S. Form W-9 (“W-9 Form”), as required under the Combined Plan (as defined below). In support of this Motion, the Liquidating Trustee submits the *Declaration of Robert S. Bernstein*, a true and complete copy of which is amended hereto as Exhibit B and incorporated herein by reference, and respectfully states as follows:

JURISDICTION AND VENUE

1. The United States Bankruptcy Court for the Western District of Pennsylvania (the “Court”) has jurisdiction over this Motion under 28 U.S.C. § 1334 and Section 19 of the Combined Plan.
2. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A), (B) and (O).
3. Venue is proper in the Court pursuant to 28 U.S.C. §§ 1408 and 1409.

4. The predicates for the relief requested herein are section 105(a) of the Bankruptcy Code and Section 11.3.3 of the Combined Plan.

BACKGROUND

5. On May 17, 2024 (“Petition Date”), the Debtors filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101, *et seq.* (as amended, the “Bankruptcy Code”), jointly administered at Case No. 24-21217-CMB (the “Cases”).

6. On June 13, 2025, the Official Committee of Unsecured Creditors (the “Committee”) filed its *Combined Plan and Disclosure Statement of Liquidation of South Hills Operations, LLC et al. Under Chapter 11 of the Bankruptcy Code* (the “Combined Plan”). *See* Doc. No. 1473.

7. On August 18, 2025, the Committee filed its Supplement/Addendum (the “Supplement”) to the Combined Plan, which included the Liquidating Trust Agreement (the “Trust Agreement”). *See* Doc. No. 1565.

8. On August 20, 2025, the Court entered an order confirming the Combined Plan (the “Confirmation Order”). *See* Doc. No. 1572.

9. The Confirmation Order appointed Robert S. Bernstein the Liquidating Trustee of the South Hills Operations, LLC, *et al.* Liquidating Trust. *See* Confirmation Order at ¶ 14.

10. On September 11, 2025, the Committee filed the *Notice Regarding Occurrence of Effective Date* of the Combined Plan. *See* Doc. No. 1624.

11. In accordance with Section 14.3 of the Combined Plan, on the Effective Date, and without the need for any further order, document, or action, all assets of the Debtors vested in the Liquidating Trust free and clear of all liens, claims, interests, and encumbrances, except any lien,

claim, interest or encumbrance expressly and specifically provided for, preserved, or created in the Combined Plan.

12. The Liquidating Trust is automatically substituted for the Debtors as a party to all contested matters, adversary proceedings, claims, administrative proceedings and lawsuits, both within and outside of the Bankruptcy Court, involving the assets, claims against the Debtors, the Causes of Action, and the resolution of disputed claims.

13. Pursuant to the Combined Plan, the Liquidating Trustee has the right to object to claims. *See* Combined Plan at Section 12.2.1.

14. Importantly, the Combined Plan provides that

The Liquidating Trustee shall require Holders of Allowed Claims to furnish to the Liquidating Trustee an employer or tax identification number as assigned by the IRS or any other applicable governmental entity, and the Liquidating Trustee may condition any Distribution to any Holder of an Allowed Claim upon receipt of such identification number. For the avoidance of doubt, the Liquidating Trustee may request Bankruptcy Court authority to release funds set aside for Distribution to Holders of Allowed Claims who have not provided proper tax identification numbers and make those funds available to the remaining Holders of Allowed Claims. The Liquidating Trustee shall not be required to make any distributions to Holders of Claims who have not provided the Disbursing Agent with requested tax reporting information.

See Combined Plan at Section 11.3.3.

15. Accordingly, the Liquidating Trustee caused to be mailed the W-9 notice (the “First W-9 Notice”) in batches to the Holders of Allowed Administrative Claims (collectively, the “Allowed Administrative Claimants”) on or about the following dates: September 29, 2025; September 30, 2025; October 1, 2025; October 6, 2025; October 7, 2025. A copy of the First W-9 Notice is attached hereto as Exhibit C.

16. Each W-9 Notice advised Allowed Administrative Claimants the federal tax law requires that each claim holder receiving a distribution from the Liquidating Trustee must submit a completed W-9 Form to the Liquidating Trustee.

17. The First W-9 Notice was mailed to each Allowed Administrative Claimants at the address listed on its proof of claim if it filed one, or alternatively, if no proof of claim was filed, at the address listed in the Debtors' schedules (the "Claim Addresses").

18. Despite being sent the First W-9 Notice, several otherwise Allowed Administrative Claimants failed to submit a completed W-9 Form to the Liquidating Trustee.

19. Consequently, the Liquidating Trustee, mailed a second notice dated December 22, 2025 to those Allowed Administrative Claimants who had still not submitted a W-9 Form at the Claim Addresses (the "Second Notice"). A copy of the Second Notice is attached here to as Exhibit D.

20. Despite sending the two W-9 Notices, 24 Allowed Administrative Claimants have failed to provide the Liquidating Trustee a completed W-9 Form (the "Noncompliant Administrative Claimants").

21. A list of these Noncompliant Administrative Claimants and their corresponding claim numbers is attached as Schedule 1 to the proposed order to the Motion (the "Proposed Order") attached hereto as Exhibit A (such claims, collectively the "Noncompliant Administrative Claims").

RELIEF REQUESTED

22. By way of this Motion, the Liquidating Trustee requests the entry of the Proposed Order, disallowing and expunging the Noncompliant Administrative Claims.

BASIS FOR RELIEF

23. The Combined Plan provides that the Liquidating Trustee must comply with all federal, state and local tax requirements, including obtaining completed W-9 Forms from all Allowed Administrative Claimants.

24. Accordingly, the Liquidating Trustee cannot distribute any funds to a Noncompliant Administrative Claimant without first obtaining a completed W-9 Form from the Allowed Administrative Claimants. In addition, the Liquidating Trustee requires all claimant information, including tax identification information, to accurately complete the Liquidating Trustee's required tax reports.

25. The Liquidating Trustee has taken reasonable actions to obtain the relevant tax information from the Noncompliant Administrative Claimants by notifying these claimants on several occasions that their failure to provide a W-9 Form may result in waiver of their rights to a distribution from the Debtors' estates and disallowance of their claims.

26. Notwithstanding these repeated efforts, the Noncompliant Administrative Claimants have failed to provide their requisite tax information to the Liquidating Trustee.

27. The Court retained jurisdiction under the Combined Plan to ensure the distributions under the Combined Plan are made as contemplated therein and issue orders necessary or appropriate to implement or consummate the provisions of the Combined Plan. *See Confirmation Order at ¶ 32.*

28. The Court also maintains inherent powers under the Bankruptcy Code to "issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of this title" and to "tak[e] any action or mak[e] any determination necessary or appropriate to enforce or implement court orders or rules." 11 U.S.C. § 105(a).

29. Granting the requested relief is necessary to aid in the enforcement of the terms of the Combined Plan.

30. The relief requested in this Motion is in the best interest of the estates and creditors.

31. The Liquidating Trustee is working diligently to evaluate, address, and review all claims submitted in the case.

32. Granting the relief requested in this Motion will further the Liquidating Trustee's efforts to minimize ongoing administrative expenses and to expedite distributions to Allowed Administrative Claimants that have timely submitted the required tax information.

33. Accordingly, in the interest of the orderly and efficient administration of the Debtors' estates, the Liquidating Trustee respectfully requests that the Court enter the Proposed Order disallowing and expunging the Noncompliant Administrative Claims.

34. To be clear, and for the avoidance of doubt, the Liquidating Trustee is not seeking, at this time, the disallowance of any lower priority claims. Future W-9 requests to lower priority claims will only occur in the event that all allowed administrative claims are paid and distributions to lower priority claimants becomes likely.

NOTICE

35. Notice of this Motion has been provided to: (i) the Office of the United States Trustee; (ii) the parties identified that have requested notice in these Cases; and (iii) and all Noncompliant Administrative Claimants whose claims stand to be affected by the relief requested in this Motion. The Liquidating Trustee submits that, in light of the nature of the relief requested, no other or further notice need be given.

NO PRIOR REQUEST

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

WHEREFORE, the Liquidating Trustee respectfully requests that the Court enter an order, substantially in the form attached hereto, granting the relief requested herein and such other and further relief as the Court deems appropriate.

Dated: January 30, 2026

Respectfully submitted,

BERNSTEIN-BURKLEY, P.C.

By: /s/ Mason S. Shelton

Mason Shelton (PA ID 332792)

601 Grant Street, 9th Floor

Pittsburgh, PA 15219-1900

Telephone: (412) 456-8100

Facsimile: (412) 456-8135

Email: mshelton@bernsteinlaw.com

Attorney for the Liquidating Trustee

EXHIBIT A

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:

SOUTH HILLS OPERATIONS, LLC *et al.*,³

Debtors.

Chapter 11

Bankruptcy Case No. 24-21217-CMB

ROBERT S. BERNSTEIN, as Liquidating
Trustee,

Movant,

v.

NON-COMPLIANT ADMINISTRATIVE
CLAIMANTS IDENTIFIED ON
SCHEDULE 1 TO EXHIBIT A ATTACHED
HERETO,

Respondent.

**ORDER DISALLOWING ADMINISTRATIVE CLAIMS DUE TO ADMINISTRATIVE
CLAIMANTS' FAILURE TO PROVIDE THE LIQUIDATING TRUSTEE
WITH I.R.S. W-9 FORMS**

³ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number are: South Hills Operations, LLC (5527); Monroeville Operations, LLC (3280); Mt. Lebanon Operations, LLC (1133); Murrysburg Operations, LLC (9149); Cheswick Rehabilitation and Wellness Center, LLC (9561); 3876 Saxonburg Boulevard Propco, LLC (3618); North Strabane Rehabilitation and Wellness Center, LLC (1677); 100 Tandem Village Road Propco, LLC (1918); Maybrook-C Briarcliff Opco, LLC (5187); Maybrook-C Briarcliff Propco, LLC (1823); Maybrook-C Evergreen Opco, LLC (5388); Maybrook-C Evergreen Propco, LLC (2000); Maybrook-C Kade Opco, LLC (4033); Maybrook-C Kade Propco, LLC (2097); Maybrook-C Latrobe Opco, LLC (4148); Maybrook-C Latrobe Propco, LLC (2178); Maybrook-C Overlook Opco, LLC (7081); Maybrook-C Overlook Propco, LLC (6804); Maybrook-C Silver Oaks Opco, LLC (7146); Maybrook-C Silver Oaks Propco, LLC (9654); Maybrook-C Whitecliff Opco, LLC (6211); Maybrook-C Whitecliff Propco, LLC (4835). The Debtors' address is 485 Lexington Avenue, 10th Floor, New York, NY 10017.

Upon the consideration of the motion (the “Motion”) of the Liquidating Trustee for the entry of an order disallowing and expunging the administrative claims of the administrative claim holders who have failed to provide the Liquidating Trustee a completed *Request for Taxpayer Identification Number and Certification*, I.R.S. Form W-9 (“W-9 Form”), the declaration of Robert S. Bernstein in support thereof, and any responses to the relief sought in the Motion; and it appearing that notice of the Motion was proper and sufficient under the circumstances and that no other or further notice is required; and the Court having determined that the relief granted herein is in the best interests of creditors and other parties in interest; and after due deliberation thereon; and good and sufficient cause appearing therefor; it is hereby ORDERED that each of the Noncompliant Administrative Claims set forth on Schedule 1 to this Order is hereby disallowed and expunged in its entirety; and it is further

ORDERED that all holders of the Noncompliant Administrative Claims shall not be entitled to share in any distribution from the Liquidating Trustee on account of such Noncompliant Administrative Claims, and the Liquidating Trustee is authorized to (i) disregard the Noncompliant Administrative Claims for purposes of calculating and making any distributions to Allowed Administrative Claimants, and (ii) distribute or use all funds reserved for or relating to the Noncompliant Administrative Claims in accordance with the terms of the Combined Plan; and it is further

ORDERED that the Motion constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014 with respect to each Noncompliant Administrative Claim. This Order shall be deemed a separate order with respect to each Noncompliant Administrative Claim. Any stay of this Order shall apply only to the contested matter which involves the holder of such Noncompliant

Administrative Claim and shall not act to stay the applicability or finality of this Order with respect to the other contested matters covered hereby; and it is further

ORDERED that the Liquidating Trustee is authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Motion; and it is further

ORDERED that Omni Agent Solutions, the Claims and Noticing Agent in the above-captioned case, is hereby authorized and directed to amend the official register of claims to reflect the effect of this Order; and it is further

ORDERED that this Court shall retain jurisdiction over all matters arising from or related to the implementation of this Order.

SO ORDERED this ____ day of _____, 2026.

The Honorable Carlota M. Böhm
United States Bankruptcy Judge

SCHEDULE 1

CLAIM NO.	CLAIMANT NAME	CLAIMANT ADDRESS	CLAIM AMOUNT	DEBTOR
C138	Beauty Mobile	Attn: Paris Parker 1375 Schwerner Ct., Pittsburgh, PA 15206	\$5,000.00	South Hills Operations, LLC
C33	Biomedical Laboratories	4504 Logan Way, Hubbard, OH 44425	\$4,062.26	Maybrook-C Evergreen Opco, LLC
C34	Biomedical Laboratories	4504 Logan Way, Hubbard, OH 44425	\$2,980.77	Maybrook-C Silver Oaks Opco, LLC
C34	Biomedical Laboratories	4504 Logan Way, Hubbard, OH 44425	\$11,257.45	Maybrook-C Whitecliff Opco, LLC
C43	Biomedical Laboratories	4504 Logan Way, Hubbard, OH 44425	\$7,790.78	Maybrook-C Overlook Opco, LLC
C31	Senior Haircare	Attn: Lois Fazio 633 Whispering Dr. Gibsonia, PA 15044	\$1,030.00	Cheswick Rehabilitation and Wellness Center, LLC
C32	Senior Haircare	Attn: Lois Fazio 633 Whispering Dr. Gibsonia, PA 15044	\$1,030.00	Cheswick Rehabilitation and Wellness Center, LLC
C156	Sound Advice Entertainment, LLC	525 Lakewood Dr Monroeville, PA 15146	\$1,200.00	South Hills Operations, LLC
C38	Syndicate ASC 1414 Lloyd's of London ("Ascot")	Attn: David Christian David Christian Attorneys LLC 105 W. Madison St., Suite 2300 Chicago, IL 60602	\$87,500.00	Cheswick Rehabilitation and Wellness Center, LLC
C120	The Grove	249 Maus Dr Irwin, PA 15642	\$150.00	South Hills Operations, LLC
C107	UPMC Health Plan, Inc.	US Steel Tower 600 Grant St, 55th Fl Pittsburgh, PA 15219	\$64,762.59	South Hills Operations, LLC

C31	Vantage DME, LLC dba Vantage Home Medical Equipment and Services	Attn: Richard J Parks, Esq 7 W State St, Ste 100 Sharon, PA 16146	\$13,460.08	Maybrook-C Evergreen Opco, LLC
C36	Vantage DME, LLC dba Vantage Home Medical Equipment and Services	Attn: Richard J Parks, Esq 7 W State St, Ste 100 Sharon, PA 16146	\$5,705.60	Cheswick Rehabilitation and Wellness Center, LLC
C47	Vantage DME, LLC dba Vantage Home Medical Equipment and Services	Attn: Richard J Parks, Esq 7 W State St, Ste 100 Sharon, PA 16146	\$8,131.84	Maybrook-C Briarcliff Opco, LLC
C33	Vantage DME, LLC dba Vantage Home Medical Equipment and Services	Attn: Richard J Parks, Esq 7 W State St, Ste 100 Sharon, PA 16146	\$19,449.42	Maybrook-C Latrobe Opco, LLC
C40	Vantage DME, LLC dba Vantage Home Medical Equipment and Services	Attn: Richard J Parks, Esq 7 W State St, Ste 100 Sharon, PA 16146	\$15,830.60	Maybrook-C Latrobe Opco, LLC
C36	Vantage DME, LLC dba Vantage Home Medical Equipment and Services	Attn: Richard J Parks, Esq 7 W State St, Ste 100 Sharon, PA 16146	\$7,298.4	Maybrook-C Kade Opco, LLC
C36	Vantage DME, LLC dba Vantage Home Medical Equipment and Services	Attn: Richard J Parks, Esq 7 W State St, Ste 100 Sharon, PA 16146	\$4,440.32	North Strabane Rehabilitation and Wellness Center, LLC
C32	Vantage DME, LLC dba Vantage Home Medical Equipment and Services	Attn: Richard J Parks, Esq 7 W State St, Ste 100 Sharon, PA 16146	\$3,303.00	Maybrook-C Silver Oaks Opco, LLC
C41	Vantage DME, LLC dba Vantage Home Medical Equipment and Services	Attn: Richard J Parks, Esq 7 W State St, Ste 100 Sharon, PA 16146	\$1,704.88	Monroeville Operations, LLC

C44	Vantage DME, LLC dba Vantage Home Medical Equipment and Services	Attn: Richard J Parks, Esq 7 W State St, Ste 100 Sharon, PA 16146	\$9,111.96	Mt. Lebanon Operations, LLC
C32	Vantage DME, LLC dba Vantage Home Medical Equipment and Services	Attn: Richard J Parks, Esq 7 W State St, Ste 100 Sharon, PA 16146	\$7,013.23	Maybrook-C Whitecliff Opco, LLC
C46	Vantage DME, LLC dba Vantage Home Medical Equipment and Services	Attn: Richard J Parks, Esq 7 W State St, Ste 100 Sharon, PA 16146	\$8,184.94	Murrysville Operations, LLC
C146	Vantage DME, LLC dba Vantage Home Medical Equipment and Services	Attn: Richard J Parks, Esq 7 W State St, Ste 100 Sharon, PA 16146	\$20,036.22	South Hills Operations, LLC

EXHIBIT B

DECLARATION OF ROBERT S. BERNSTEIN

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:

SOUTH HILLS OPERATIONS, LLC *et al.*,⁴

Debtors.

Chapter 11

Bankruptcy Case No. 24-21217-CMB

ROBERT S. BERNSTEIN, as Liquidating
Trustee,

Movant,

v.

NON-COMPLIANT ADMINISTRATIVE
CLAIMANTS IDENTIFIED ON
SCHEDULE 1 TO EXHIBIT A ATTACHED
HERETO,

Respondent.

**DECLARATION OF ROBERT S. BERNSTEIN IN SUPPORT OF MOTION OF THE
LIQUIDATING TRUSTEE FOR AN ORDER
DISALLOWING AND EXPUNGING ADMINISTRATIVE CLAIMS DUE TO
ADMINISTRATIVE CLAIMANTS' FAILURE TO PROVIDE THE LIQUIDATING
TRUSTEE WITH IRS W-9 FORMS**

⁴ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number are: South Hills Operations, LLC (5527); Monroeville Operations, LLC (3280); Mt. Lebanon Operations, LLC (1133); Murrysburg Operations, LLC (9149); Cheswick Rehabilitation and Wellness Center, LLC (9561); 3876 Saxonburg Boulevard Propco, LLC (3618); North Strabane Rehabilitation and Wellness Center, LLC (1677); 100 Tandem Village Road Propco, LLC (1918); Maybrook-C Briarcliff Opco, LLC (5187); Maybrook-C Briarcliff Propco, LLC (1823); Maybrook-C Evergreen Opco, LLC (5388); Maybrook-C Evergreen Propco, LLC (2000); Maybrook-C Kade Opco, LLC (4033); Maybrook-C Kade Propco, LLC (2097); Maybrook-C Latrobe Opco, LLC (4148); Maybrook-C Latrobe Propco, LLC (2178); Maybrook-C Overlook Opco, LLC (7081); Maybrook-C Overlook Propco, LLC (6804); Maybrook-C Silver Oaks Opco, LLC (7146); Maybrook-C Silver Oaks Propco, LLC (9654); Maybrook-C Whitecliff Opco, LLC (6211); Maybrook-C Whitecliff Propco, LLC (4835). The Debtors' address is 485 Lexington Avenue, 10th Floor, New York, NY 10017.

I, Robert S. Bernstein, hereby declare that the following is true to the best of my knowledge, information, and belief.

1. I am the Liquidating Trustee of the South Hills Operations, LLC, *et al.* Liquidating Trust (the “Liquidating Trustee”), successor in interest to the estate of South Hills Operations, LLC *et al.* (the “Debtors”), the debtors in the above-captioned chapter 11 case (the “Chapter 11 Case”).

2. I am authorized and qualified by virtue of my status as Liquidating Trustee to make this declaration. I have personal knowledge of the facts set forth in this declaration, and if called upon, I could and would testify thereto.

3. I make this declaration in support of the *Motion of the Liquidating Trustee for an Order Disallowing and Expunging Administrative Claims due to Administrative Claimant’s Failure to Provide the Liquidating Trustee with IRS W-9 Forms* (the “Motion”).

4. As Liquidating Trustee, my duties include, among other things, the oversight of (a) the claims reconciliation process with respect to claims asserted against the Debtors, (b) the compliance with all federal, state and local tax requirements, including obtaining completed *Request for Taxpayer Identification Number and Certification*, I.R.S. Form W-9 (“W-9 Form”) from the Holders of Allowed Claims (collectively, “Allowed Claimants”), and (c) overseeing the distributions to the Allowed Claimants pursuant to the Combined Plan.

5. I make this declaration on the basis of my review of the official register of claims (the “Claims Register”), the *Schedules of Assets and Liabilities* and *Statements of Financial Affairs* filed by the Debtors (collectively, as amended, the “Schedules”), the proofs of claim filed in the Debtors’ Chapter 11 Cases, the relevant federal taxpayer information that has been obtained from the Allowed Claimants as well as discussions with professionals for the Liquidating Trustee.

6. To the best of my knowledge and belief, the information contained in Schedule 1 to the Proposed Order is true and correct.

7. On or about September 29, 2025; September 30, 2025; October 1, 2025; October 6, 2025; October 7, 2025, the Liquidating Trustee caused to be mailed a notice (the “First W-9 Notice”), by which the Liquidating Trustee notified the potential Allowed Claimants that federal income tax law requires that each claim holder receiving a distribution from the Liquidating Trustee must submit a completed W-9 Form to the Liquidating Trustee. The First W-9 Notice was mailed to each Allowed Claimant at the address listed on its proof of claim if it filed one, or alternatively, if no proof of claim was filed, at the address listed in the Debtors’ schedules (the “Claim Addresses”).

8. Despite being sent the First W-9 Notice, several otherwise Allowed Claimants failed to submit a completed W-9 Form to the Liquidating Trustee. Consequently, the Liquidating Trustee, mailed a second notice dated December 22, 2025 to those Allowed Claimants who had still not submitted a W-9 Form at the Claim Addresses (the “Second Notice”).

9. Despite sending the two W-9 Notices, 24 Allowed Claimants have failed to provide the Liquidating Trustee a completed W-9 Form (the “Noncompliant Administrative Claimants”).

10. To the best of my knowledge and belief, the Noncompliant Administrative Claimants listed on Schedule 1 to the Proposed Order represent the claims of the Noncompliant Administrative Claimants for which the Liquidating Trustee does not have the taxpayer identification information necessary to fulfill its obligations under the Combined Plan or applicable tax laws and regulations.

11. For the foregoing reason, I respectfully request that the Court grant the relief requested in the Motion.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Dated: January 30, 2026

/s/ Robert S. Bernstein

Robert S. Bernstein
Liquidating Trustee

EXHIBIT C

COPY OF FIRST NOTICE



A business approach to legal service SM

Robert S. Bernstein

rbernstein@bernsteinlaw.com | (412) 456-8101

Board Certified in Business Bankruptcy Law and
Creditors' Rights Law - American Board of
Certification

September 29, 2025



Re: South Hills Trust - Tax Matters
Our File Number: 5033-002

Dear Creditor:

As of September 11, 2025, I am the Trustee of the South Hills Operations et al Liquidating Trust. You are listed as a creditor of one of the Debtors¹ with a possible administrative expense priority claim. I have not yet reviewed the claims and cannot yet say if there will be an objection to your claim or enough money to make a meaningful payment anytime soon.

As a potential beneficiary of the Liquidating Trust, you are required to provide me with your tax ID information. Failure to provide the tax ID will interfere with your distribution and may cause your claim to be treated as "disallowed," meaning that you will not be entitled to payment, even if your claim is recognized and "Allowed."

Attached is a W9 Form for this purpose. You are required to complete and return this information as a beneficiary and in order to receive any payment which may be due to you. Please return the form by mail or email (or fax) within 30 days of this request.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: South Hills Operations, LLC (5527); Monroeville Operations, LLC (3280); Mt. Lebanon Operations, LLC (1133); Murrysburg Operations, LLC (9149); Cheswick Rehabilitation and Wellness Center, LLC (9561); 3876 Saxonburg Boulevard Propco, LLC (3618); North Strabane Rehabilitation and Wellness Center, LLC (1677); 100 Tandem Village Road Propco, LLC (1918); Maybrook-C Briarcliff Opco, LLC (5187); Maybrook-C Briarcliff Propco, LLC (1823); Maybrook-C Evergreen Opco, LLC (5388); Maybrook-C Evergreen Propco, LLC (2000); Maybrook-C Kade Opco, LLC (4033); Maybrook-C Kade Propco, LLC (2097); Maybrook-C Latrobe Opco, LLC (4148); Maybrook-C Latrobe Propco, LLC (2178); Maybrook-C Overlook Opco, LLC (7081); Maybrook-C Overlook Propco, LLC (6804); Maybrook-C Silver Oaks Opco, LLC (7146); Maybrook-C Silver Oaks Propco, LLC (9654); Maybrook-C Whitecliff Opco, LLC (6211); Maybrook-C Whitecliff Propco, LLC (4835).

I will begin reviewing the administrative expense claims in the coming weeks and will contact you if I have any questions about your claims. Regardless, you must return the tax ID information. Thank you.

Very truly yours,
BERNSTEIN-BURKLEY, P.C.

A handwritten signature in black ink, appearing to read "Robert S. Bernstein", with a long horizontal flourish extending to the right.

Robert S. Bernstein

RSB/

EXHIBIT D

COPY OF SECOND NOTICE



A business approach to legal service SM

Robert S. Bernstein

rbernstein@bernsteinlaw.com | (412) 456-8101

Board Certified in Business Bankruptcy Law and
Creditors' Rights Law - American Board of
Certification

December 22, 2025



Re: FOLLOW UP – FINAL Request for Taxpayer Identification Number (Form W-9)
South Hills Trust - Tax Matters / Our File Number: 5033-002

Dear Creditor:

In early October 2025 I wrote requesting a W9 form so I can obtain your tax ID number for proper reporting of the distributions in this case. As of today, I have not received your W9 or your tax ID number.

You are listed as a creditor of one of the Debtors¹ with a possible administrative expense priority claim. I have not yet reviewed the claims and cannot yet say if there will be an objection to your claim or enough money to make a meaningful payment anytime soon.

Another blank WS9 is attached. If I do not receive your W9 by January 12, 2026, I will not ask again. As a potential beneficiary of the Liquidating Trust, you are required to provide me with your tax ID information. Failure to provide the tax ID will interfere with your distribution and may cause your claim to be treated as “disallowed,” meaning that you will not be entitled to payment, even if your claim would otherwise be recognized and “Allowed.”

If you have any questions about this request, please feel free to contact me. Thank you for your prompt attention.

Very truly yours,
BERNSTEIN-BURKLEY, P.C.

Robert S. Bernstein

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: South Hills Operations, LLC (5527); Monroeville Operations, LLC (3280); Mt. Lebanon Operations, LLC (1133); Murrysburg Operations, LLC (9149); Cheswick Rehabilitation and Wellness Center, LLC (9561); 3876 Saxonburg Boulevard Propco, LLC (3618); North Strabane Rehabilitation and Wellness Center, LLC (1677); 100 Tandem Village Road Propco, LLC (1918); Maybrook-C Briarcliff Opco, LLC (5187); Maybrook-C Briarcliff Propco, LLC (1823); Maybrook-C Evergreen Opco, LLC (5388); Maybrook-C Evergreen Propco, LLC (2000); Maybrook-C Kade Opco, LLC (4033); Maybrook-C Kade Propco, LLC (2097); Maybrook-C Latrobe Opco, LLC (4148); Maybrook-C Latrobe Propco, LLC (2178); Maybrook-C Overlook Opco, LLC (7081); Maybrook-C Overlook Propco, LLC (6804); Maybrook-C Silver Oaks Opco, LLC (7146); Maybrook-C Silver Oaks Propco, LLC (9654); Maybrook-C Whitecliff Opco, LLC (6211); Maybrook-C Whitecliff Propco, LLC (4835).

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:

SOUTH HILLS OPERATIONS, LLC *et al.*,¹

Debtors.

Chapter 11

Bankruptcy Case No. 24-21217-CMB

ROBERT S. BERNSTEIN, as Liquidating
Trustee,

Movant,

Related Doc. No.: 1727

v.

NON-COMPLIANT ADMINISTRATIVE
CLAIMANTS IDENTIFIED ON
SCHEDULE 1 TO EXHIBIT A ATTACHED
HERETO,

Respondent.

**NOTICE OF HEARING AND RESPONSE DEADLINE REGARDING MOTION OF
THE LIQUIDATING TRUSTEE FOR AN ORDER
DISALLOWING AND EXPUNGING ADMINISTRATIVE CLAIMS DUE TO
ADMINISTRATIVE CLAIMANTS' FAILURE TO PROVIDE THE LIQUIDATING
TRUSTEE WITH IRS W-9 FORMS**

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TO: (i) the Office of the United States Trustee; (ii) the parties identified that have requested notice in these Cases; and (iii) and all Noncompliant Administrative Claimants whose claims stand to be affected by the relief requested in this Motion. The Liquidating Trustee submits that, in light of the nature of the relief requested, no other or further notice need be given.

You should take this Notice and the Motion to a lawyer at once.

On January 30, 2026, Robert S. Bernstein, appointed as the Liquidating Trustee (the “Liquidating Trustee”) of the above-captioned debtor and its affiliated debtor (the “Debtors”) pursuant to the *Combined Plan and Disclosure Statement of Liquidation of South Hills Operations, LLC et al. Under Chapter 11 of the Bankruptcy Code* (the “Combined Plan”), the Supplement/Addendum (the “Supplement”) to the Combined Plan, which included the Liquidating Trust Agreement (the “Trust Agreement”), and the order confirming the Plan (the “Confirmation Order”), filed the attached *Motion of the Liquidating Trustee for an Order Disallowing and Expunging Administrative Claims due to Administrative Claimant’s Failure to Provide the Liquidating Trustee with IRS W-9 Forms* (the “Motion”) with the United States Bankruptcy Court for the Western District of Pennsylvania (the “Bankruptcy Court”).

Any response or objection to the Motion must be (a) in writing and served on or before March 11, 2026, 4:00 p.m (prevailing Eastern Time) (the “Objection Deadline”); (b) filed with the Clerk of the United States Bankruptcy Court for the Western District of Pennsylvania, 5414 U.S. Steel Tower, 600 Grant Street, Pittsburgh, PA 15219; and (c) served as to be received on or before the Objection Deadline by the undersigned attorneys for the Liquidating Trustee.

PLEASE TAKE FURTHER NOTICE THAT only objections made in writing and timely filed and received, in accordance with the procedures above, will be considered by the Bankruptcy Court at such hearing. **If you fail to timely file and serve a written response, an order granting**

the relief requested in the Motion may be entered and the hearing may not be held. Please refer to the calendar posted on the Court's webpage to verify if a default order was signed or if the hearing will go forward as scheduled.

PLEASE TAKE FURTHER NOTICE THAT A HEARING ON THE MOTION WILL BE HELD ON MARCH 18, 2026 AT 11:30 A.M. (PREVAILING EASTERN TIME) BEFORE THE HONORABLE CARLOTA M. BÖHM IN COURTROOM B, AT THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA, 5414 U.S. STEEL TOWER, 600 GRANT STREET, PITTSBURGH, PA 15219.

In accordance with Judge Böhm's procedures, parties may appear for non-evidentiary matters remotely by utilizing the Zoom video conference platform. Parties seeking to appear remotely must register for the hearing by submitting a registration form via the link published on Judge Böhm's website (which can be found at <https://www.pawb.uscourts.gov/judge-bohms-video-conference-hearing-information>) by no later than 4 p.m. on the business day prior to the scheduled hearing. All parties participating remotely shall comply with Judge Böhm's *General Procedures*, which can be found at <https://www.pawb.uscourts.gov/procedures-1>.

Parties who fail to timely register for remote participation will be expected to attend the hearing in person.

Only a limited time of ten (10) minutes is being provided on the calendar. No witnesses will be heard. If there is an issue of fact, an evidentiary hearing will be scheduled by the Court for a later date.

Dated: January 30, 2026

Respectfully submitted,

BERNSTEIN-BURKLEY, P.C.

By: /s/ Mason S. Shelton

Mason Shelton (PA ID 332792)

601 Grant Street, 9th Floor

Pittsburgh, PA 15219-1900

Telephone: (412) 456-8100

Facsimile: (412) 456-8135

Email: mshelton@bernsteinlaw.com

Attorney for the Liquidating Trustee

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:

SOUTH HILLS OPERATIONS, LLC *et al.*¹

Debtors.

Chapter 11

Bankruptcy Case No. 24-21217-CMB

ROBERT S. BERNSTEIN, as Liquidating
Trustee,

Movant,

v.

CLAIMANTS IDENTIFIED ON
SCHEDULE 1 TO EXHIBIT A ATTACHED
HERETO,

Respondent.

Related Doc. No.: 1473, 1565, 1572

**LIQUIDATING TRUSTEE'S FIRST OMNIBUS
OBJECTION TO CERTAIN ADMINISTRATIVE CLAIMS**

**THIS OBJECTION SEEKS TO DISALLOW AND EXPUNGE CERTAIN
ADMINISTRATIVE CLAIMS. CLAIMANTS RECEIVING THIS OBJECTION
SHOULD LOCATE THEIR NAMES AND CLAIMS ON SCHEDULE 1 TO EXHIBIT A
ATTACHED TO THIS OBJECTION**

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number are: South Hills Operations, LLC (5527); Monroeville Operations, LLC (3280); Mt. Lebanon Operations, LLC (1133); Murrysburg Operations, LLC (9149); Cheswick Rehabilitation and Wellness Center, LLC (9561); 3876 Saxonburg Boulevard Propco, LLC (3618); North Strabane Rehabilitation and Wellness Center, LLC (1677); 100 Tandem Village Road Propco, LLC (1918); Maybrook-C Briarcliff Opco, LLC (5187); Maybrook-C Briarcliff Propco, LLC (1823); Maybrook-C Evergreen Opco, LLC (5388); Maybrook-C Evergreen Propco, LLC (2000); Maybrook-C Kade Opco, LLC (4033); Maybrook-C Kade Propco, LLC (2097); Maybrook-C Latrobe Opco, LLC (4148); Maybrook-C Latrobe Propco, LLC (2178); Maybrook-C Overlook Opco, LLC (7081); Maybrook-C Overlook Propco, LLC (6804); Maybrook-C Silver Oaks Opco, LLC (7146); Maybrook-C Silver Oaks Propco, LLC (9654); Maybrook-C Whitecliff Opco, LLC (6211); Maybrook-C Whitecliff Propco, LLC (4835). The Debtors' address is 485 Lexington Avenue, 10th Floor, New York, NY 10017.

Robert S. Bernstein, solely in his capacity as the Liquidating Trustee of the South Hills Operations, LLC, *et al.* Liquidating Trust (the “Liquidating Trustee”), successor in interest to the estates of South Hills Operations, LLC *et al.* (“South Hills” or the “Debtors”), the debtors in the above-captioned chapter 11 case (the “Chapter 11 Case”), through his undersigned counsel, submits this objection (“Objection”), pursuant to section 502 of title 11 of the United States Code, 11 U.S.C. § 101 *et seq.* (the “Bankruptcy Code”), and Rules 3007 and 9014 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), for the entry of an order substantially in the form attached as **Exhibit A** (the “Order”) disallowing and expunging the claims identified on **Schedule 1** to the Order (the “Administrative Claims”) because these Administrative Claims (i) are duplicative, (ii) lack supporting documentation, (iii) were filed for the incorrect debtor, or (iv) were not timely filed prior to the bar date.

JURISDICTION AND VENUE

1. The United States Bankruptcy Court for the Western District of Pennsylvania (the “Court”) has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334.
2. This is a core proceeding pursuant to 28 U.S.C. § 157(b).
3. Venue is proper in the Court pursuant to 28 U.S.C. §§ 1408 and 1409.
4. The statutory predicate for the relief requested herein is section 502 of the Bankruptcy Code. Such relief is warranted under Bankruptcy Rules 3007 and 9014.

BACKGROUND

5. On May 17, 2024 (“Petition Date”), the Debtors filed a voluntary petition before this Court for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101, *et seq.* (as amended, the “Bankruptcy Code”), at case number 24-21217-CMB (the “Case”).

6. On June 13, 2025, the Official Committee of Unsecured Creditors (the “Committee”) filed its *Combined Plan and Disclosure Statement of Liquidation of South Hills Operations, LLC et al. Under Chapter 11 of the Bankruptcy Code* (the “Combined Plan”). See Doc. No. 1473.

7. On August 18, 2025, the Committee filed its Supplement/Addendum (the “Supplement”) to the Combined Plan, which included the Liquidating Trust Agreement (the “Trust Agreement”). See Doc. No. 1565.

8. On August 20, 2025, the Court entered an order confirming the Combined Plan (as modified by the Supplement) (the “Confirmation Order”). See Doc. No. 1572.

9. The Confirmation Order approved the appointment of Robert S. Bernstein as the Liquidating Trustee of the South Hills Operations, LLC, *et al.* Liquidating Trust. See Confirmation Order at ¶ 14.

10. On September 11, 2025, the Committee filed the *Notice Regarding Occurrence of Effective Date* of the Combined Plan (the “Effective Date”). See Doc. No. 1624.

11. In accordance with Section 14.3 of the Combined Plan, on the Effective Date, and without the need for any further order, document, or action, all assets of the Debtors vested in the Liquidating Trust free and clear of all liens, claims, interests, and encumbrances, except any lien, claim, interest or encumbrance expressly and specifically provided for, preserved, or created in the Combined Plan. The Liquidating Trust is automatically substituted for the Debtors as a party to all contested matters, adversary proceedings, claims, administrative proceedings and lawsuits, both within and outside of the Bankruptcy Court, involving the assets, claims against the Debtors, the Causes of Action, and the resolution of disputed claims.

12. Pursuant to the Combined Plan, the Liquidating Trustee has the right to object to claims. *See* Combined Plan at Section 12.2.1.

THE ADMINISTRATIVE CLAIMS BAR DATE

13. On January 15, 2025, the Court entered an *Order Setting Administrative Claims Bar Date For Expenses Incurred Prior to January 15, 2025* (the “Administrative Claims Order”). *See* Doc. No. 1085.

14. Accordingly, the administrative claims bar date was set to February 28, 2025, at 4:00 p.m. (the “Administrative Claims Bar Date”). In addition to requiring all administrative claims to be filed by February 28, 2025, the Administrative Claims Order also required, *inter alia*, that administrative claims asserted shall:

- a. Specify the name of the Debtor against which the claim be submitted against;
- b. Be a separate request against each Debtor thereby not reflecting a lump sum request; and
- c. Include supporting documentation or, if voluminous a summary of supporting documentation with an accompanying explanation as to why documentation is not available.

15. Each of the claimants with Administrative Claims identified on Schedule 1, are Creditors who did not comply with the Administrative Claims Order, which the Liquidating Trustee seeks to enforce.

RELIEF REQUESTED

16. By this Objection, the Liquidating Trustee seeks entry of an Order, pursuant to section 502 of the Bankruptcy Code and Bankruptcy Rules 3007 and 9014, disallowing and

expunging Claims that (i) are duplicative, (ii) lacking supporting documentation, (iii) were filed for the incorrect Debtor, or (iv) were not timely filed prior to the Administrative Claims Bar Date.

17. Section 502 of the Bankruptcy Code states that “[a] claim or interest, proof of which is filed under section 501 of [the Bankruptcy Code], is deemed allowed, unless a party in interest . . . objects.” 11 U.S.C. § 502.

18. Each of the Administrative Claims are, as indicated on Schedule 1, are (i) are duplicative, (ii) lack supporting documentation, (iii) were filed for the incorrect debtor, or (iv) were not timely filed prior to the Administrative Claims Bar Date.

19. Failure to disallow the Administrative Claims would result in claimants receiving an unwarranted, often duplicative, recovery against the Liquidating Trust, to the detriment of other creditors.

20. Accordingly, the Liquidating Trustee respectfully requests that the Court disallow and expunge each of the Administrative Claims identified on **Schedule 1** attached to the Order.

COMPLIANCE WITH BANKRUPTCY RULE 3007(c)

21. The Liquidating Trustee respectfully submits that this Objection complies with the requirements for omnibus objections set forth by Bankruptcy Rule 3007(e).

22. Namely, among other things, the Objection conspicuously states that claimants receiving the objection should locate their names and claims in the Objection, contains objections to no more than 100 proofs of claim, and identifies this Objection as the first omnibus claims objection.

23. Additionally, the proposed form of Order identifies each claimant by category of claims subject to the objection.

24. To the extent that this Objection does not comply in all respects with the requirements of Bankruptcy Rule 3007(e), the Liquidating Trustee believes such deviations are not material and respectfully request that any such requirement be waived.

SEPARATE CONTESTED MATTER

25. To the extent that a response is filed regarding any Administrative Claims and the Liquidating Trustee is unable to resolve any such response, each such Administrative Claim, and the Objection as it pertains to such Administrative Claim, will constitute a separate contested matter as contemplated by Bankruptcy Rule 9014.

26. Further, the Liquidating Trustee requests that any order entered by the Court regarding an objection or other reply asserted in response to this Objection be deemed a separate order with respect to each proof of claim.

ADJOURNMENT OF HEARING

27. The Liquidating Trustee reserves the right to seek an adjournment of the hearing on any response filed to the Objection.

28. In the event that the Liquidating Trustee seeks such an adjournment, it will be noted on the notice of agenda for the hearing, and such agenda will be served on the claimant by service upon the person designated in the response.

RESERVATION OF RIGHTS

29. This Objection is limited to the grounds stated herein.

30. Accordingly, it is without prejudice to the rights of the Liquidating Trustee or any other party in interest to object to any claim on any grounds whatsoever, and the Liquidating Trustee expressly reserves all further substantive or procedural objections they may have.

31. Nothing contained herein or any action taken pursuant to such relief is intended or should be construed as: (a) an admission as to the validity of any prepetition claim against a Debtor entity; (b) a waiver of any party's right to dispute any prepetition claim on any grounds; (c) a promise or requirement to pay any prepetition claim; (d) an implication or admission that any particular claim is of a type specified or defined in this Objection or any order granting the relief requested by this Objection; (e) a request or authorization to assume any prepetition agreement, contract, or lease pursuant to section 365 of the Bankruptcy Code; or (f) a waiver of the Debtors' or Liquidating Trustee's rights under the Bankruptcy Code or any other applicable law.

NOTICE

32. Notice of this has been provided to the parties identified that have requested notice in this Case and the holders of Administrative Claims. The Liquidating Trustee submits that, in light of the nature of the relief requested, no other or further notice need be given.

NO PRIOR REQUEST

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

WHEREFORE, the Liquidating Trustee respectfully request that the Court enter an order, substantially in the form attached as **Exhibit A**, granting the relief requested herein and such other and further relief as the Court deems appropriate.

Dated: January 30, 2026

Respectfully submitted,

BERNSTEIN-BURKLEY, P.C.

By: /s/ Mason S. Shelton

Mason Shelton (PA ID 332792)

601 Grant Street, 9th Floor

Pittsburgh, PA 15219-1900

Telephone: (412) 456-8100

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Email: mshelton@bernsteinlaw.com

Attorney for the Liquidating Trustee

EXHIBIT A

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:	Chapter 11
SOUTH HILLS OPERATIONS, LLC <i>et al.</i> ²	Bankruptcy Case No. 24-21217-CMB
Debtors.	
ROBERT S. BERNSTEIN, as Liquidating Trustee,	Related Doc. No.: 1473, 1565, 1572
Movant,	
v.	
CLAIMANTS IDENTIFIED ON SCHEDULE 1 TO EXHIBIT A ATTACHED HERETO,	
Respondent.	

**ORDER SUSTAINING LIQUIDATING TRUSTEE'S FIRST
OMNIBUS OBJECTION TO CERTAIN PROOFS OF CLAIM**

Upon the *Liquidating Trustee's First Omnibus Objection to Certain Proofs of Claim* (the "Objection"), and the Court having reviewed the Objection; and having heard the statements of

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counsel at the hearing on the Objection, if any; and the Court finding that: (i) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; (ii) notice of the Objection and the hearing thereon was sufficient under the circumstances; and (iii) the legal and factual bases set forth in the Objection establish just cause for the relief granted herein;

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED THAT:

1. The Objection is SUSTAINED as set forth herein.
2. Any response to the Objection not otherwise withdrawn, resolved, or adjourned is hereby overruled on its merits.
3. The Administrative Claims identified on Schedule 1 attached hereto are hereby disallowed and expunged.
4. Each of the Administrative Claims and the Objection by the Liquidation Trustee to each such Administrative Claim constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order will be deemed a separate order with respect to each of the Claims.
5. Notwithstanding the relief granted in this Order and any actions taken pursuant to such relief, nothing in this Order shall be deemed: (a) an admission as to the validity of any prepetition claim against a Debtor entity; (b) a waiver of any party's right to dispute any prepetition claim on any grounds; (c) a promise or requirement to pay any prepetition claim; (d) an implication or admission that any particular claim is of a type specified or defined in this Objection or any order granting the relief requested by this Objection; (e) a request or authorization to assume any prepetition agreement, contract, or lease pursuant to section 365 of the Bankruptcy Code; or (f) a waiver of the Debtors' rights under the Bankruptcy Code or any other applicable law.

6. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

7. The Liquidating Trustee is authorized to take all actions necessary to implement the relief granted in this Order.

8. The Court shall retain jurisdiction with respect to all matters arising or related to the implementation of this order.

Dated: _____, 2026

Hon. Carlota M. Bohm
United States Bankruptcy Court

Schedule 1

CASE NO	CLAIM NUMBER	CREDITOR NAME	BASIS FOR OBJECTION	ASSERTED CLAIM AMOUNT
24-21217	C138	Beauty Mobile	Insufficient information provided	\$5,000.00
24-21217	C117	Commonwealth of Pennsylvania, Department of Human Services	Bulk; duplicative of individual claim	\$2,976,204.18
24-21217	C143	FirstEnergy Pennsylvania Electric Company	Duplicative	\$18,840.18
24-21217	C125	Franklin Township Municipal Sanitation Authority	Incorrect Debtor	\$17,899.86
24-21220	C2	Gutnicki LLP	Lump sum filing	\$162,934.06
24-21226	C3	Gutnicki LLP	Lump sum filing	\$162,934.06
24-21232	C37	Gutnicki LLP	Lump sum filing	\$162,934.06
24-21219	C6	Gutnicki LLP	Lump sum filing	\$162,934.06
24-21221	C32	Gutnicki LLP	Lump sum filing	\$162,934.06
24-21223	C8	Gutnicki LLP	Lump sum filing	\$162,934.06
24-21229	C5	Gutnicki LLP	Lump sum filing	\$162,934.06
24-21228	C9	Gutnicki LLP	Lump sum filing	\$162,934.06
24-21234	C41	Gutnicki LLP	Lump sum filing	\$162,934.06
24-21237	C33	Gutnicki LLP	Lump sum filing	\$162,934.06
24-10271	C33	Gutnicki LLP	Lump sum filing	\$162,934.06
24-21224	C34	Gutnicki LLP	Lump sum filing	\$162,934.06
24-21227	C37	Gutnicki LLP	Lump sum filing	\$162,934.06

24-21238	C4	Gutnicki LLP	Lump sum filing	\$162,934.06
24-10272	C5	Gutnicki LLP	Lump sum filing	\$162,934.06
24-21235	C37	Gutnicki LLP	Lump sum filing	\$162,934.06
24-21217	C119	Municipality of Monroeville	Incorrect Debtor	\$33,025.00
24-21230	C39	Murrysville Medic One	Not timely filed	\$7,795.10
24-21217	C124	National Fuel Gas Distribution Corporation	Incorrect Debtor	\$1,304.41
24-21217	C133	NY Rytes Corporation	Incorrect Debtor (Not a Debtor)	\$1,088.70
24-21217	C134	NY Rytes Corporation	Incorrect Debtor (Not a Debtor)	\$1,088.70
24-21217	C135	NY Rytes Corporation	Incorrect Debtor (Not a Debtor)	\$1,088.70
24-21217	C123	Pacific Indemnity Company	Insufficient Information Provided	\$36,081.00
24-21217	C126	Pittsburgh Fire Sprinkler	Incorrect Debtor	\$1,650.00
24-21217	C141	Premier Therapy LLC	Bulk claim	\$9,061.38
24-21217	C142	SEIU Healthcare PA Training & Education Fund	Bulk claim	\$35,570.00
24-21232	C31	Senior Hare Care	Insufficient Information Provided	\$1,030.00
24-21217	C156	Sound Advice Entertainment, LLC	Not timely filed	\$1,200.00
24-21217	C136	U.S. Sealcoat	Incorrect Debtor	\$3,600.00
24-21217	C137	U.S. Sealcoat	Duplicative & Incorrect Debtor	\$3,600.00
24-21217	C107	UPMC HealthPlan, Inc.	Bulk claim	\$64,762.59

24-21217	C121	W.E.W.J.A.	Incorrect Debtor	\$10,253.75
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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:

SOUTH HILLS OPERATIONS, LLC *et al.*,³

Debtors.

Chapter 11

Bankruptcy Case No. 24-21217-CMB

ROBERT S. BERNSTEIN, as Liquidating
Trustee,

Movant,

Related Doc. No.: 1729

v.

NON-COMPLIANT ADMINISTRATIVE
CLAIMANTS IDENTIFIED ON
SCHEDULE 1 TO EXHIBIT A ATTACHED
HERETO,

Respondent.

**NOTICE OF HEARING AND RESPONSE DEADLINE REGARDING LIQUIDATING
TRUSTEE'S FIRST OMNIBUS
OBJECTION TO CERTAIN ADMINISTRATIVE CLAIMS**

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TO: (i) the Office of the United States Trustee; (ii) the parties identified that have requested notice in these Cases; and (iii) and all Noncompliant Administrative Claimants whose claims stand to be affected by the relief requested in this Motion. The Liquidating Trustee submits that, in light of the nature of the relief requested, no other or further notice need be given.

You should take this Notice and the Motion to a lawyer at once.

On January 23, 2026, Robert S. Bernstein, appointed as the Liquidating Trustee (the “Liquidating Trustee”) of the above-captioned debtor and its affiliated debtor (the “Debtors”) pursuant to the *Combined Plan and Disclosure Statement of Liquidation of South Hills Operations, LLC et al. Under Chapter 11 of the Bankruptcy Code* (the “Combined Plan”), the Supplement/Addendum (the “Supplement”) to the Combined Plan, which included the Liquidating Trust Agreement (the “Trust Agreement”), and the order confirming the Plan (the “Confirmation Order”), filed the attached *Motion of the Liquidating Trustee for an Order Disallowing and Expunging Administrative Claims due to Administrative Claimant’s Failure to Provide the Liquidating Trustee with IRS W-9 Forms* (the “Motion”) with the United States Bankruptcy Court for the Western District of Pennsylvania (the “Bankruptcy Court”).

Any response or objection to the Motion must be (a) in writing and served on or before March 11, 2026, 4:00 p.m (prevailing Eastern Time) (the “Objection Deadline”); (b) filed with the Clerk of the United States Bankruptcy Court for the Western District of Pennsylvania, 5414 U.S. Steel Tower, 600 Grant Street, Pittsburgh, PA 15219; and (c) served as to be received on or before the Objection Deadline by the undersigned attorneys for the Liquidating Trustee.

PLEASE TAKE FURTHER NOTICE THAT only objections made in writing and timely filed and received, in accordance with the procedures above, will be considered by the Bankruptcy Court at such hearing. **If you fail to timely file and serve a written response, an order granting**

the relief requested in the Motion may be entered and the hearing may not be held. Please refer to the calendar posted on the Court's webpage to verify if a default order was signed or if the hearing will go forward as scheduled.

PLEASE TAKE FURTHER NOTICE THAT A HEARING ON THE MOTION WILL BE HELD ON MARCH 18, 2026 AT 11:30 A.M. (PREVAILING EASTERN TIME) BEFORE THE HONORABLE CARLOTA M. BÖHM IN COURTROOM B, AT THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA, 5414 U.S. STEEL TOWER, 600 GRANT STREET, PITTSBURGH, PA 15219.

In accordance with Judge Böhm's procedures, parties may appear for non-evidentiary matters remotely by utilizing the Zoom video conference platform. Parties seeking to appear remotely must register for the hearing by submitting a registration form via the link published on Judge Böhm's website (which can be found at <https://www.pawb.uscourts.gov/judge-bohms-video-conference-hearing-information>) by no later than 4 p.m. on the business day prior to the scheduled hearing. All parties participating remotely shall comply with Judge Böhm's *General Procedures*, which can be found at <https://www.pawb.uscourts.gov/procedures-1>.

Parties who fail to timely register for remote participation will be expected to attend the hearing in person.

Only a limited time of ten (10) minutes is being provided on the calendar. No witnesses will be heard. If there is an issue of fact, an evidentiary hearing will be scheduled by the Court for a later date.

Dated: January 30, 2026

Respectfully submitted,

BERNSTEIN-BURKLEY, P.C.

By: /s/ Mason S. Shelton

Mason Shelton (PA ID 332792)

601 Grant Street, 9th Floor

Pittsburgh, PA 15219-1900

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Attorney for the Liquidating Trustee

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:

SOUTH HILLS OPERATIONS, LLC et al.,¹

Debtors.

Chapter 11

Bankruptcy Case No. 24-21217-CMB

ROBERT S. BERNSTEIN, as Liquidating
Trustee,

Movant,

Related Doc. No.: 1473, 1565, 1572

v.

NO RESPONDENTS.

**LIQUIDATING TRUSTEE’S AMENDED MOTION TO EXTEND
CLAIMS OBJECTION DEADLINE**

Robert S. Bernstein, solely in his capacity as the Liquidating Trustee of the South Hills Operations, LLC, *et al.* Liquidating Trust (the “Liquidating Trustee”), successor in interest to the estates of South Hills Operations, LLC *et al.* (“South Hills” or the “Debtors”), the debtors in the above-captioned chapter 11 cases (the “Chapter 11 Cases”), through his undersigned counsel, hereby moves for entry of an order extending by approximately one-year until and including

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number are: South Hills Operations, LLC (5527); Monroeville Operations, LLC (3280); Mt. Lebanon Operations, LLC (1133); Murrysburg Operations, LLC (9149); Cheswick Rehabilitation and Wellness Center, LLC (9561); 3876 Saxonburg Boulevard Propco, LLC (3618); North Strabane Rehabilitation and Wellness Center, LLC (1677); 100 Tandem Village Road Propco, LLC (1918); Maybrook-C Briarcliff Opco, LLC (5187); Maybrook-C Briarcliff Propco, LLC (1823); Maybrook-C Evergreen Opco, LLC (5388); Maybrook-C Evergreen Propco, LLC (2000); Maybrook-C Kade Opco, LLC (4033); Maybrook-C Kade Propco, LLC (2097); Maybrook-C Latrobe Opco, LLC (4148); Maybrook-C Latrobe Propco, LLC (2178); Maybrook-C Overlook Opco, LLC (7081); Maybrook-C Overlook Propco, LLC (6804); Maybrook-C Silver Oaks Opco, LLC (7146); Maybrook-C Silver Oaks Propco, LLC (9654); Maybrook-C Whitecliff Opco, LLC (6211); Maybrook-C Whitecliff Propco, LLC (4835). The Debtors’ address is 485 Lexington Avenue, 10th Floor, New York, NY 10017.

Wednesday, March 10, 2027, the period during which the Liquidating Trustee may object to claims in this case. In support, the Liquidating Trustee states:

BACKGROUND

1. On May 17, 2024 (“Petition Date”), the Debtors filed voluntary petitions before this Court for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101, et seq. (as amended, the “Bankruptcy Code”), at case number 24-21217-CMB (the “Cases”).

2. On June 13, 2025, the Official Committee of Unsecured Creditors (the “Committee”) filed its *Combined Plan and Disclosure Statement of Liquidation of South Hills Operations, LLC et al. Under Chapter 11 of the Bankruptcy Code* (the “Combined Plan”). See Doc. No. 1473.

3. On August 18, 2025, the Committee filed its Supplement/Addendum (the “Supplement”) to the Combined Plan, which included the Liquidating Trust Agreement (the “Trust Agreement”). See Doc. No. 1565.

4. On August 20, 2025, the Court entered an order confirming the Combined Plan (as modified by the Supplement) (the “Confirmation Order”). See Doc. No. 1572.

5. The Confirmation Order approved the appointment of Robert S. Bernstein as the Liquidating Trustee of the South Hills Operations, LLC, *et al.* Liquidating Trust. See Confirmation Order at ¶ 14.

6. On September 11, 2025, the Committee filed the *Notice Regarding Occurrence of Effective Date* of the Combined Plan (the “Effective Date”). See Doc. No. 1624.

7. In accordance with Section 14.3 of the Combined Plan, on the Effective Date, and without the need for any further order, document, or action, all assets of the Debtors vested in the Liquidating Trust free and clear of all liens, claims, interests, and encumbrances, except any lien,

claim, interest or encumbrance expressly and specifically provided for, preserved, or created in the Combined Plan. The Liquidating Trust is automatically substituted for the Debtors as a party to all contested matters, adversary proceedings, claims, administrative proceedings and lawsuits, both within and outside of the Bankruptcy Court, involving the assets, claims against the Debtors, the Causes of Action, and the resolution of disputed claims.

8. Pursuant to the Combined Plan, the Liquidating Trustee has the right to object to claims. *See* Combined Plan at Section 12.2.1.

9. Pursuant to the Combined Plan and the Confirmation Order, the current deadline to object to any disputed claim “shall be made on or before one hundred eighty (180) days from the Effective Date” unless otherwise extended by Court order. *See* Combined Plan at Section 3.8; *see also* Confirmation Order p. 32.

10. The Combined Plan’s Effective Date was September 11, 2025; thus, the current objection deadline is March 10, 2025 (the “Claims Objection Deadline”).

11. This *Amended Motion to Extend Claim Objection Deadline* (the “Amended Motion”) is being filed prior to the present Claims Objection Deadline. Therefore, it is timely.

BASIS FOR REQUESTED RELIEF

12. The Liquidating Trustee submits that ample “cause” exists to extend the Claims Objection Deadline.

13. The Combined Plan provides for payment Chapter 11 Administrative Expense Priority Claims (“Administrative Claims”) before any payment is made to lower priority claims.

14. The Liquidating Trust has not been able to predict whether funds will be available to reach other classes, in part because the Liquidating Trustee believes that the filed Administrative

Claims are inflated and excessive and in part because he has not yet formed a belief whether the remaining assets will be sufficient to reach classes of creditors below Administrative Claims.

15. Since the Effective Date, the Liquidating Trustee has been evaluating Administrative Claims to assess grounds for objection. The Liquidating Trustee intends to clean up the Administrative Claims register either by agreement of the parties or filing objections to the claims. For example, the Liquidating Trustee has already reached multiple agreements with claimants to expunge duplicative claims and has filed an omnibus objection to Administrative Claims that are duplicative, lack supporting documentation, were filed for the incorrect debtor, or were not timely filed prior to the bar date.

16. The Liquidating Trustee also believes additional Administrative Claims may be objectionable and other proceedings may be appropriate subject to performing a cost-benefit analysis with respect to each.

17. The Liquidating Trustee does not believe it is appropriate to spend the limited assets of the Trust and the investigating, negotiating, and objecting to claims below the Administrative Claims until he has a reasonable belief that he will have funds to pay allowed Administrative Claims in full and reach other classes.

18. The Claims Objection Deadline should be extended in order to allow the Liquidating Trustee to conclude more work on Administrative Claims reconciliation and allow his Avoidance Action and other litigation to proceed.

19. To eliminate wasteful and repetitive extension requests, the Liquidating Trustee submits that an additional one-year extension is appropriate is appropriate.

WHEREFORE, the Liquidating Trustee respectfully requests that the Court (I) enter an Order, in substantially the form attached as **Exhibit A**, extending each of the Claims Objection

Deadline, until and including Wednesday, March 10, 2027, without prejudice to the ability or right of the Liquidating Trustee to seek one or more further extension of the period, and (II) granting to the Liquidating Trustee all other just and proper relief.

Dated: January 30, 2026

Respectfully submitted,

BERNSTEIN-BURKLEY, P.C.

By: /s/ Mason S. Shelton

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Attorney for the Liquidating Trustee

**IN THE UNITED STATES BANKRUPTCY COURT
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IN RE:

SOUTH HILLS OPERATIONS, LLC et al.,²

Debtors.

Chapter 11

Bankruptcy Case No. 24-21217-CMB

ROBERT S. BERNSTEIN, as Liquidating
Trustee,

Movant,

Related Doc. No.: 1473, 1565, 1572

v.

NO RESPONDENTS.

ORDER

This matter came before the Court on the *Liquidating Trustee's Amended Motion to Extend Claim Objection Deadline* (the "Amended Motion"), Robert S. Bernstein, solely in his capacity as the Liquidating Trustee of the South Hills Operations, LLC, *et al.* Liquidating Trust (the "Liquidating Trustee"), successor in interest to the estates of South Hills Operations, LLC *et al.* ("South Hills" or the "Debtors"), the debtors in the above-captioned chapter 11 case (the "Chapter

² The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number are: South Hills Operations, LLC (5527); Monroeville Operations, LLC (3280); Mt. Lebanon Operations, LLC (1133); Murrysburg Operations, LLC (9149); Cheswick Rehabilitation and Wellness Center, LLC (9561); 3876 Saxonburg Boulevard Propco, LLC (3618); North Strabane Rehabilitation and Wellness Center, LLC (1677); 100 Tandem Village Road Propco, LLC (1918); Maybrook-C Briarcliff Opco, LLC (5187); Maybrook-C Briarcliff Propco, LLC (1823); Maybrook-C Evergreen Opco, LLC (5388); Maybrook-C Evergreen Propco, LLC (2000); Maybrook-C Kade Opco, LLC (4033); Maybrook-C Kade Propco, LLC (2097); Maybrook-C Latrobe Opco, LLC (4148); Maybrook-C Latrobe Propco, LLC (2178); Maybrook-C Overlook Opco, LLC (7081); Maybrook-C Overlook Propco, LLC (6804); Maybrook-C Silver Oaks Opco, LLC (7146); Maybrook-C Silver Oaks Propco, LLC (9654); Maybrook-C Whitecliff Opco, LLC (6211); Maybrook-C Whitecliff Propco, LLC (4835). The Debtors' address is 485 Lexington Avenue, 10th Floor, New York, NY 10017

11 Cases”). And the Court, having found and determined: that it has subject matter jurisdiction of this case and the Amended Motion pursuant to 28 U.S.C. §§ 1334 and 157; that the Amended Motion presents a “core proceeding” under 28 U.S.C. § 157(b) as to which the Court has the statutory and constitutional authority to enter a final order or judgment; that venue of this case and the Amended Motion in this district and division is proper under 28 U.S.C. §§ 1408 and 1409; that adequate and sufficient notice of the Amended Motion (and any hearing thereon) was given under the particular circumstances to those creditors and parties in interest who are entitled to notice, in accordance with applicable law and rules of Court; that sufficient “cause” exists to grant the relief requested in the Amended Motion; and that sufficient legal and factual bases exist to grant the Amended Motion, it is hereby ORDERED that:

- (I) The Amended Motion shall be and hereby is GRANTED;
- (II) All capitalized terms used but not defined in this Order shall have the meanings given to them in the Amended Motion;
- (III) The Claims Objection Deadline shall be extended from March 10, 2026, until and including Wednesday, March 10, 2027, without prejudice to the ability or right of the Liquidating Trustee to seek one or more further extensions of the period; and
- (IV) The Court retains its jurisdiction to the maximum extent permitted by law to interpret and enforce this Order.

SO ORDERED this ____ day of _____, 2026.

The Honorable Carlota M. Böhm
United States Bankruptcy Judge