

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

In re

GUARDIAN ELDER CARE AT
JOHNSTOWN, LLC, d/b/a/ RICHLAND
HEALTHCARE AND REHABILITATION
CENTER, *et al.*,

Debtors.¹

GUARDIAN ELDER CARE AT
JOHNSTOWN, LLC, d/b/a/ RICHLAND
HEALTHCARE AND REHABILITATION
CENTER, *et al.*,

v.

NO RESPONDENT

Chapter 11

Case No. 24-70299 (JAD)

Jointly Administered

**Objection Deadline: March 18, 2026 at 4:00 p.m.
(ET)**

**SUMMARY COVER SHEET FOR SEVENTEENTH MONTHLY FEE
APPLICATION OF SAUL EWING LLP, COUNSEL TO THE DEBTORS, FOR
ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR
THE PERIOD FROM DECEMBER 1, 2025 THROUGH DECEMBER 31, 2025**

1. Your applicant, Saul Ewing, LLP (“**Saul Ewing**”) was retained by the Debtors, effective as of July 29, 2024 [Docket No. 273].
2. Saul Ewing represents Guardian Elder Care at Johnstown, LLC d/b/a Richland Healthcare and Rehabilitation Center and its affiliated debtors and debtors in possession.
3. The total amount of the compensation requested by Saul Ewing for the period from January 1, 2026 through January 31, 2026 is \$59,775.50, 80% of which is \$47,820.40.
4. This is a monthly fee application.

¹ The last four digits of Guardian Elder Care at Johnstown, LLC d/b/a Richland Healthcare and Rehabilitation Center’s federal tax identification number are 7907. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://omniagentsolutions.com/Guardian>. The Debtors’ mailing address is: 8796 Route 219, Brockway, Pennsylvania 15824.

5. The amount of compensation previously requested is \$2,678,419.25 (80% of which is \$2,142,735.40).
6. The amount of compensation previously approved is \$2,678,419.25.
7. The amount of compensation previously paid is \$1,805,453.60.
8. The total amount of expenses for which reimbursement is sought for the period from January 1, 2026 to January 31, 2026 is \$390.97.
9. The amount of expenses previously requested is \$117,355.80.
10. The amount of expenses previously approved is \$117,355.80.
11. The amount of expenses previously paid is \$110,770.13.
12. The blended hourly rate for this application is \$770.30.

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13. Other factors bearing on fee application: N/A

Dated: March 4, 2026

SAUL EWING LLP

By: /s/ Jeffrey C. Hampton

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Counsel for Debtors and Debtors in Possession

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FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In re

GUARDIAN ELDER CARE AT
JOHNSTOWN, LLC, d/b/a/ RICHLAND
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Debtors.¹

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v.

NO RESPONDENT

Chapter 11

Case No. 24-70299 (JAD)

Jointly Administered

**Objection Deadline: March 18, 2026 at 4:00 p.m.
(ET)**

**EIGHTEENTH MONTHLY FEE APPLICATION OF SAUL EWING LLP,
COUNSEL TO THE DEBTORS, FOR ALLOWANCE OF COMPENSATION
AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM
JANUARY 1, 2026 THROUGH JANUARY 31, 2026**

Name of applicant:

Saul Ewing LLP

Authorized to provide
professional services to:

Debtors and Debtors-in-Possession

Petition Date:

July 29, 2024

Date of retention:

Nunc pro tunc to July 29, 2024

This is a:

Monthly application for compensation

¹

The last four digits of Guardian Elder Care at Johnstown, LLC d/b/a Richland Healthcare and Rehabilitation Center's federal tax identification number are 7907. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://omniagentsolutions.com/Guardian>. The Debtors' mailing address is: 8796 Route 219, Brockway, Pennsylvania 15824.

Period for which compensation
and reimbursement are sought:

January 1, 2026 through January 31, 2026

Amount of compensation sought:

\$59,775.50 (80% of which is \$47,820.40)

Amount of expense reimbursement sought:

\$390.97

Blended hourly rate for this application:

\$770.30

SUMMARY OF PRIOR MONTHLY FEE APPLICATIONS

DATE FILED AND DOCKET NO.	PERIOD COVERED	REQUESTED FEES	REQUESTED EXPENSES	UNOPPOSED FEES	UNOPPOSED EXPENSES	PAID FEES	PAID EXPENSES	HOLDBACK/ UNAPPROVED FEES & EXPENSES	CNO DATE AND DOCKET NO.
10/17/2024 D.I. 731	07/29/2024- 08/31/2024	\$520,526.75 (80% of which is \$416,421.40)	\$85,422.47	\$520,526.75	\$85,422.47	\$416,421.40	\$85,422.47	\$104,105.35	11/4/2024 D.I. 850
11/12/2024 D.I. 877	09/01/2024- 09/30/2024	\$395,408.50 (80% of which is \$316,326.80)	\$6,038.90	\$395,408.50	\$6,038.90	\$316,326.80	\$6,038.90	\$79,081.70	11/27/2024 D.I. 959
12/4/2024 D.I. 971, 976	10/01/2024- 10/31/2024	\$412,365.75 (80% of which is \$329,892.60)	\$6,124.25	\$412,365.75	\$6,124.25	\$329,892.60	\$6,124.25	\$82,473.15	12/19/2024 D.I. 1101
1/24/2025 D.I. 1168	11/01/2024- 11/30/2024	\$193,464.50 (80% of which is \$154,771.60)	\$3,275.09	\$193,464.50	\$3,275.09	\$154,771.60	\$3,275.09	\$38,692.90	2/17/2025 D.I. 1330
3/6/2025 D.I. 1427	12/01/2024- 12/31/2024	\$220,904.50 (80% of which is \$176,723.60)	\$6,945.52	\$220,904.50	\$6,945.52	\$176,723.60	\$6,945.52	\$44,180.90	3/21/2025 D.I. 1472
3/12/2025 D.I. 1443	1/01/2025- 1/31/2025	\$108,878.50 (80% of which is \$87,102.80)	\$690.38	\$108,878.50	\$690.38	\$87,102.80	\$690.38	\$21,775.70	3/27/2025 D.I. 1524
05/20/2025 D.I. 1733	2/01/2025- 2/28/2025	\$116,718.50 (80% of which is \$93,374.80)	\$676.03	\$116,718.50	\$676.03	\$93,374.80	\$676.03	\$23,343.70	6/04/2025 D.I. 1790
6/09/2025 D.I. 1799	3/01/2025- 3/31/2025	\$153,057.00 (80% of which is \$122,445.60)	\$1,310.60	\$153,057.00	\$1,310.60	122,445.60	\$1,310.60	\$30,611.40	6/25/2025 D.I. 1895
6/12/2025 D.I. 1810	4/01/2025- 4/30/2025	\$135,493.00 (80% of which is \$108,394.40)	\$286.89	\$135,493.00	\$286.89	\$108,394.40	\$286.89	\$27,098.60	6/27/2025 D.I. 1910
7/31/2025 D.I. 2029	5/01/2025- 5/31/2025	\$71,837.00 (80% of which is \$57,469.60)	\$594.70	\$71,837.00	\$594.70	\$0.00	\$0.00	\$14,367.40	8/15/2025 D.I. 2088
8/21/2025 D.I. 2137	6/01/2025- 6/30/2025	\$63,179.00 (80% of which is \$50,543.20)	\$242.10	\$63,179.00	\$242.10	\$0.00	\$0.00	\$12,635.80	9/04/2025 D.I. 2209
9/15/2025 D.I. 2275	7/01/2025- 7/31/2025	\$45,301.00 (80% of which is \$36,240.80)	\$34.00	\$45,301.00	\$34.00	\$0.00	\$0.00	\$9,060.20	9/30/2025 D.I. 2324

10/16/2025 D.I. 2396	8/01/2025- 8/31/2025	\$39,076.00 (80% of which is \$31,260.80)	\$0.00	\$39,076.00	\$0.00	\$0.00	\$0.00	\$7,815.20	11/03/2025 D.I. 2459
12/01/2025 D.I. 2543	9/01/2025- 9/30/2025	\$32,908.50 (80% of which is \$26,326.80)	\$0.00	\$32,908.50	\$0.00	\$0.00	\$0.00	\$6,581.70	12/16/2025 D.I. 2578
12/05/2025 D.I. 2549	10/01/2025- 10/31/2025	\$28,799.00 (80% of which is \$23,039.20)	\$94.90	\$28,799.00	\$94.90	\$0.00	\$0.00	\$5,759.80	12/22/2025 D.I. 2633
1/30/2026 D.I. 2713	11/01/2025- 11/30/2025	\$82,405.75 (80% of which is \$65,924.60)	\$4,634.00	\$82,405.75	\$4,634.00	\$0.00	\$0.00	\$16,481.15	2/19/2026 D.I. 2733
2/10/2026 D.I. 2721	12/01/2025- 12/31/2025	\$58,096.00 (80% of which is \$46,476.80)	\$985.97	\$58,096.00	\$985.97	\$0.00	\$0.00	\$11,619.20	2/27/2026 D.I. 2744
	Totals:	\$2,678,419.25 (80% of which is \$2,142,735.40)	\$117,355.80	\$2,678,419.25	\$117,355.80	\$1,805,453.60	\$110,770.13	\$535,683.85	

SUMMARY OF PRIOR INTERIM FEE APPLICATIONS

DATE FILED	PERIOD COVERED	ORDER ENTERED	REQUESTED FEES	REQUESTED EXPENSES	UNOPPOSED FEES	UNOPPOSED EXPENSES	PAID FEES	PAID EXPENSES
12/16/2024	07/29/2024- 10/31/2024	1/15/25 [D.I. 1145]	\$1,328,301.00	\$97,585.62	\$1,328,301.00	\$97,585.62	\$1,062,640.80	\$97,585.62
3/14/2025	11/1/2024- 01/31/2025	04/3/2025 [D.I. 1548]	\$523,247.50	\$10,910.99	\$523,247.50	\$10,910.99	\$418,598.00	\$10,910.99
6/13/2025	02/1/2025- 04/30/2025	07/2/2025 [D.I. 1919]	\$405,268.50	\$2,273.52	\$405,268.50	\$2,273.52	\$324,214.80	\$2,273.52
9/15/2025	05/1/2025- 7/31/2025	10/8/2025 [D.I. 2375]	\$180,317.00	\$870.80	\$180,317.00	\$870.80	\$0.00	\$0.00
12/12/2025	8/1/2025- 10/31/2025	1/5/2026 [D.I. 2644]	\$100,783.50	\$94.90	\$100,783.50	\$94.90	\$0.00	\$0.00
		Totals:	\$2,537,917.50	\$111,735.83	\$2,537,917.50	\$111,735.83	\$1,805,453.60	\$110,770.13

COMPENSATION BY ATTORNEY PROFESSIONALS

NAME OF PROFESSIONAL	POSITION	DEPARTMENT	YEAR ADMITTED	HOURLY BILLING RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Mark Minuti	Partner	Bankruptcy	1988	\$1,055	29.7	\$31,333.50
Jeffrey C. Hampton	Partner	Bankruptcy	1990	\$930	14.4	\$13,392.00
Clarence Y. Lee	Partner	Litigation	2004	\$710	1.8	\$1,278.00
Monique B. DiSabatino	Partner	Bankruptcy	2009	\$735	6.4	\$4,704.00
Maxwell M. Hanamirian	Associate	Bankruptcy	2024	\$380	7.8	\$2,964.00
Total for Attorneys:					60.1	\$53,671.50

COMPENSATION BY PARAPROFESSIONAL OR STAFF MEMBER

NAME OF PARAPROFESSIONAL OR STAFF MEMBER	POSITION	DEPARTMENT	YEAR ADMITTED	HOURLY BILLING RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Patricia Markey	Paralegal	Litigation / Bankruptcy	N/A	\$340	13.1	\$4,454.00
eDiscovery Project Manager - EDPM	Litigation Support	Litigation	N/A	\$375	4.4	\$1,650.00
Total for Paraprofessionals and other staff:					17.5	\$6,104.00

COMPENSATION BY PROFESSIONAL CATEGORY

PROFESSIONALS	BLENDED RATE	TOTAL HOURS	TOTAL COMPENSATION
Partners	\$969.55	52.3	\$50,707.50
Counsel	N/A	N/A	N/A
Associates	\$380.00	7.8	\$2,964.00
Paraprofessionals or Staff Members	\$340.00	13.1	\$4,454.00
Other (Litigation Support, Clerical)	\$375.00	4.4	\$1,650.00
Total Amount Sought for Application Period			\$59,775.50
Blended Hourly Rate/Total fees			\$770.30
Less 20% Holdback			\$11,955.10
Total Adjusted Fees Requested per Interim Compensation Order			\$47,820.40

COMPENSATION BY PROJECT CATEGORY

NO.	PROJECT CATEGORY	TOTAL HOURS BILLED	TOTAL COMPENSATION
1.	Business Operations	16.7	\$15,887.50
2.	Case Administration	21.5	\$9,079.00
3.	Claims Analysis, Objections Proofs of Claim	0.3	\$220.50
4.	Committee Matters	10.4	\$10,559.50
5.	Creditor Inquiries	0.2	\$147.00
6.	Fee/Employment Applications (Saul Ewing)	2.2	\$1,017.00
7.	Fee/Employment Applications (Other Professionals)	0.4	\$187.50
8.	Litigation: Contested Matters and Adverse Proceedings	22.8	\$19,661.50
9.	Plan and Disclosure Statement	0.3	\$279.00
10.	Preparation for and Attendance at Hearings	1.9	\$2,004.50
11.	UST Reports, Meetings and Issues	0.9	\$732.50
	Total:	77.6	\$59,775.50
		80% of Total Compensation:	\$47,820.40

ITEMIZED EXPENSES

EXPENSE CATEGORY	EXPENSES
Epiq Relativity eDiscovery Costs	\$346.35
Federal Express	\$44.62
Total:	\$390.97

Pursuant to sections 330 and 331 of title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), Rule 2016-1 of the Local Bankruptcy Rules of the United States Bankruptcy Court for the Western District of Pennsylvania (the “**Local Rules**”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* [Docket No. 275] (the “**Interim Compensation Order**”), Saul Ewing LLP (“**Saul Ewing**” or the “**Applicant**”), counsel to the debtors and debtors-in-possession (the “**Debtors**”), hereby applies to the Court for its eighteenth monthly fee application for professional services rendered and reimbursement of actual and necessary expenses incurred for the period January 1, 2026 through January 31, 2026 (the “**Application Period**”) with its retention as counsel to the Debtors. In accordance with the Interim Compensation Order, Saul Ewing requests authorization to be paid by the Debtors \$47,820.40 (80% of which is \$59,775.50) in fees and \$390.97 in expenses incurred during the Application Period.

Attached hereto as **Exhibit A** is a detailed itemization, by project category, of all services performed by the Applicant with respect to these matters during the Application Period. In addition, in accordance with Local Rule 2016-1, set forth below are summaries describing the services performed within each category. Attached hereto as **Exhibit B** is a Declaration of Applicant with respect to the compensation requested.

CATEGORY 1: BUSINESS OPERATIONS

This category includes all matters relating to the general operation of the Debtors’ businesses. Saul Ewing spent 16.7 hours of attorney time on the foregoing services. Said services have a value of \$15,887.50 for which Saul Ewing is seeking compensation.

Business Operations			
Professionals	Position	Hours	Compensation
M. Minuti	Partner	6.8	\$7,174.00
J. Hampton	Partner	7.6	\$7,068.00
C. Lee	Partner	1.8	\$1,278.00

M. DiSabatino	Partner	0.5	\$367.50
Total		16.7	\$15,887.50

CATEGORY 2: CASE ADMINISTRATION

This category includes all matters related to work regarding the administration of the case, including updating a case calendar, drafting, revising and filing notices of agenda, preparing and revising administrative motions, revising proposed orders, and drafting certificates of counsel and certifications of no objection. Saul Ewing spent 21.5 hours of attorney and paraprofessional time on the foregoing services. Said services have a value of \$9,079.00 for which Saul Ewing is seeking compensation.

Case Administration			
Professionals	Position	Hours	Compensation
M. Minuti	Partner	1.3	\$1,371.50
J. Hampton	Partner	0.3	\$279.00
M. DiSabatino	Partner	1.1	\$808.50
M. Hanamirian	Associate	5.7	\$2,166.00
P. Markey	Paralegal	13.1	\$4,454.00
Total		21.5	\$9,079.00

CATEGORY 3: CLAIMS ANALYSIS, OBJECTIONS, PROOFS OF CLAIM

This category includes all time spent in connection with claim and bar date issues. Saul Ewing spent 0.3 hours of attorney time on the foregoing services. Said services have a value of \$220.50 for which Saul Ewing is seeking compensation.

Claims Analysis, Objections, Proofs of Claim			
Professionals	Position	Hours	Compensation
M. DiSabatino	Partner	0.3	\$220.50
Total		0.3	\$220.50

CATEGORY 4: COMMITTEE MATTERS

This category includes all time spent in connection with Committee matters, including reviewing and revising a settlement agreement related to alleged claims asserted against certain directors and officers and addressing Committee information requests. Saul Ewing spent 10.4 hours of attorney time on the foregoing services. Said services have a value of

\$10,559.50 for which Saul Ewing is seeking compensation.

Committee Matters			
Professionals	Position	Hours	Compensation
M. Minuti	Partner	7.1	\$7,490.50
J. Hampton	Partner	3.3	\$3,069.00
Total		10.4	\$10,559.50

CATEGORY 5: CREDITOR INQUIRIES

This category includes all matters related to creditor inquiries. Saul Ewing spent 0.2 hours of attorney and paraprofessional time on the foregoing services. Said services have a value of \$147.00 for which Saul Ewing is seeking compensation.

Creditor Inquiries			
Professionals	Position	Hours	Compensation
M. DiSabatino	Partner	0.2	\$147.00
Total		0.2	\$147.00

CATEGORY 6: FEE/EMPLOYMENT APPLICATIONS (SAUL EWING)

This category includes all matters related to the review and preparation of a retention application and fee applications for Saul Ewing. Saul Ewing spent 2.2 hours of attorney and paraprofessional time on the foregoing services. Said services have a value of \$1,017.00 for which Saul Ewing is seeking compensation.

Fee/Employment Applications (Saul Ewing)			
Professionals	Position	Hours	Compensation
J. Hampton	Partner	0.2	\$186.00
M. DiSabatino	Partner	0.2	\$147.00
M. Hanamirian	Associate	1.8	\$684.00
Total		2.2	\$1017.00

CATEGORY 7: FEE/EMPLOYMENT APPLICATIONS (OTHER PROFESSIONALS)

This category includes all matters related to the review and analysis and filing of retention and fee applications for other professionals in these Chapter 11 Cases. Saul Ewing spent 0.4 hours of attorney and paraprofessional time on the foregoing services. Said services have a value of \$187.50 for which Saul Ewing is seeking compensation.

Fee/Employment Applications (Other Professionals)			
Professionals	Position	Hours	Compensation
M. DiSabatino	Partner	0.1	\$73.50
M. Hanamirian	Associate	0.3	\$114.00
Total		0.4	\$187.50

CATEGORY 8: LITIGATION: CONTESTED MATTERS AND ADVERSE PROCEEDINGS

This category includes all matters related to litigation. Time in this category includes responding to a subpoena and finalizing a settlement agreement motion. Saul Ewing spent 22.8 hours of attorney time on the foregoing services. Said services have a value of \$19,661.50 for which Saul Ewing is seeking compensation.

Litigation: Contested Matters and Adversary Proceedings			
Professionals	Position	Hours	Compensation
M. Minuti	Partner	12.5	\$13,187.50
J. Hampton	Partner	2.5	\$2,325.00
M. DiSabatino	Partner	3.4	\$2,499.00
eDiscovery Project Manager - EDPM	Litigation Support	4.4	\$1,650.00
Total		22.8	\$19,661.50

CATEGORY 9: PLAN AND DISCLOSURE STATEMENT

This category includes all matters related to plan and disclosure statement issues. Time in this category includes addressing settlement agreement implementation issues. Saul Ewing spent 0.3 hours of attorney time on the foregoing services. Said services have a value of \$279.00 for which Saul Ewing is seeking compensation.

Plan and Disclosure Statement			
Professionals	Position	Hours	Compensation
J. Hampton	Partner	0.3	\$279.00
Total		0.3	\$279.00

CATEGORY 10: PREPARATION FOR AND ATTENDANCE AT HEARINGS

This category includes all matters related to preparation for and attendance at hearings. Time in this category includes attending a hearing on Public Credit's motion to dismiss the

Committee's adversary proceeding. Saul Ewing spent 1.9 hours of attorney time on the foregoing services. Said services have a value of \$2,004.50 for which Saul Ewing is seeking compensation.

Preparation for and Attendance at Hearings			
Professionals	Position	Hours	Compensation
M. Minuti	Partner	1.9	\$2,004.50
Total		1.9	\$2,004.50

CATEGORY 11: UST REPORTS, MEETINGS AND ISSUES

This category includes time related to the preparation of operating reports and other information required by the UST or the Court. Saul Ewing spent 0.9 hours of attorney time on the foregoing services. Said services have a value of \$732.50 for which Saul Ewing is seeking compensation.

UST Reports, Meetings and Issues			
Professionals	Position	Hours	Compensation
M. Minuti	Partner	0.1	\$105.50
J. Hampton	Partner	0.2	\$186.00
M. DiSabatino	Partner	0.6	\$441.00
Total		0.9	\$732.50

EXPENSES.

Saul Ewing seeks \$390.97 in expenses for the following categories:

Summary of Expenses		
Expense Category	Service Provider (if applicable)	Total
Total Epiq Relativity eDiscovery Costs	Epiq Relativity	\$346.35
Total Federal Express	Federal Express	\$44.62
Total		\$390.97

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WHEREFORE, Saul Ewing respectfully requests that the Court enter an Order (i) allowing, authorizing and directing payment of interim compensation in the amount of \$59,775.50 (80% of which is \$47,820.40) for legal services rendered on behalf of the Debtors during the Application Period, together with reimbursement of disbursements in the amount of \$390.97; and (ii) granting such other and further relief as the Court deems just and proper.

Dated: March 4, 2026

SAUL EWING LLP

By: /s/ Jeffrey C. Hampton

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Counsel for Debtors and Debtors in Possession

EXHIBIT A

DETAIL TIME ENTRIES BY CATEGORY

Guardian Elder Care at Johnstown, LLC
 Michael Herald
 c/o Michael J. Gerald, President & CEO
 8796 US-219
 Brockway, PA 15824

Invoice Number 4489772
 Invoice Date 02/17/26
 Client Number 391460
 Matter Number 00004

Re: Business Operations

FOR PROFESSIONAL SERVICES RENDERED THROUGH 01/31/26:

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
12/22/25	CYL	Review policy and insurance consult	1.80	1,278.00
01/02/26	JCH	Review correspondence with M. Herald re: document production issues re: SEJU subpoena	0.20	186.00
01/02/26	JCH	Review and analysis of estate funding status	0.20	186.00
01/05/26	JCH	Review correspondence with SEJV counsel re: document request and follow up re: same	0.20	186.00
01/06/26	MM	Telephone call with and e-mail with J. Hampton re: post-petition bed tax issues	0.20	211.00
01/06/26	MM	Further e-mails with J. Hampton re: bed taxes outstanding	0.40	422.00
01/07/26	MM	E-mail to J. Hampton re: Public Credit's fees/costs for December	0.10	105.50
01/07/26	MM	Review of Public Credit's fees/costs for December	0.10	105.50
01/07/26	MM	Telephone call with J. Hampton re: Public Credit issues	0.20	211.00
01/07/26	MM	E-mail to M. Herald re: payment of Public Credit's fees	0.10	105.50
01/07/26	MM	Call with J. Hampton re: DIP loan indemnity issues	0.20	211.00
01/07/26	JCH	Review and analysis of DIP order and DIP credit agreement provisions re: indemnification	0.40	372.00
01/07/26	MBD	Correspondence to counsel re: wage attachment order issue	0.30	220.50
01/08/26	MM	E-mail from M. Herald re: Sysco refund and outcome of 1/6 call with Committee	0.20	211.00
01/08/26	JCH	Correspondence with M. Herald re: update re: settlement and committee discussions	0.20	186.00
01/08/26	JCH	Correspondence with M. Herald re: cash flow update and refund received	0.20	186.00
01/08/26	JCH	Review and analysis of plan scenarios	0.40	372.00
01/12/26	JCH	Review status of settlement agreement re: carrier position and re: open issues	0.20	186.00

391460
00004
02/17/26

Guardian Elder Care at Johnstown, LLC
Business Operations

Invoice Number 4489772
Page: 2

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
01/13/26	JCH	Review correspondence with M. Herald re: update from hearing on motion to dismiss and analysis of case strategy re: same	0.20	186.00
01/14/26	JCH	Review and analysis of receivables analysis prepared by Eisner re: owned portfolio	0.20	186.00
01/14/26	JCH	Review and analysis of materials received from L. Berret re: estate collection analysis re: Public Credit dispute	0.20	186.00
01/15/26	MM	E-mail from M. Herald re: Department of Human Services demand for amount due from Uniontown	0.10	105.50
01/15/26	JCH	Review notice from Commonwealth of PA re: Cuarzo property	0.10	93.00
01/16/26	MM	E-mails with A. Sherman re: flow of funds	0.20	211.00
01/16/26	MM	E-mails with P. Cordaro re: Public Credit issues	0.20	211.00
01/16/26	MM	Zoom call with J. Hampton and A. Wilen re: Pubic Credit issues	0.50	527.50
01/16/26	MM	E-mails with J. Logfren re: request for A/R information	0.20	211.00
01/16/26	MM	E-mails with Eisner re: Public Credit's request for A/R information	0.20	211.00
01/16/26	JCH	Further review and analysis of Eisner Amper analysis of receivables analysis re: owned portfolio	0.30	279.00
01/16/26	JCH	Correspondence and conference with A. Wilen re: analysis of Public Credit collateral analysis	0.40	372.00
01/16/26	JCH	Review and analysis of correspondence and materials received from J. Lofgren, counsel to Public Credit, re: collateral analysis	0.20	186.00
01/18/26	JCH	Review and analysis of accounts receivable balances and subsequent collection in owned portfolio	0.40	372.00
01/18/26	JCH	Review and analysis of estate cash position and cash flow needs	0.30	279.00
01/18/26	JCH	Review materials in preparation for call with Public Credit counsel	0.30	279.00
01/19/26	MM	E-mails with L. Berret re: Committee's financial advisor's request for waterfall information	0.20	211.00
01/19/26	MM	Zoom call with P. Cordero re: A/R issues	0.50	527.50
01/19/26	MM	Zoom call with L. Berret re: A/R issues	0.30	316.50
01/19/26	MM	E-mail and call with A. Sherman re: Public Credit issues / A/R issues	0.30	316.50
01/19/26	MM	Search e-mail file re: historical changes to Owned Portfolio DIP order	0.80	844.00
01/19/26	MM	E-mails with J. Hampton re: DIP changes on A/R	0.30	316.50
01/19/26	MM	E-mail to L. Berret re: A/R breakdown needed for Public Credit's claim analysis	0.20	211.00
01/19/26	MM	E-mails from L. Berret re: tracking down A/R information	0.20	211.00
01/19/26	MM	Further e-mails with J. Hampton and L. Berret re: A/R collections	0.20	211.00
01/19/26	JCH	Conference with P. Cordaro, counsel to Public Credit, re: committee complaint and lien analysis	0.50	465.00

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
01/19/26	JCH	Conference with L. Berret or Eisner Advisors re: Public Credit collateral analysis	0.30	279.00
01/19/26	JCH	Review and analysis of accounts receivable and collateral analysis re: owned portfolio debts	0.40	372.00
01/19/26	JCH	Conference with M. Minuti and A. Sherman re: committee complaint re: Public Credit dispute	0.20	186.00
01/19/26	JCH	Review and analysis of committee position re: Public Credit collateral analysis	0.20	186.00
01/19/26	JCH	Review and analysis of DIP order re: order drafts and sale order drafts re: payment priority for DIP lender	0.40	372.00
01/19/26	JCH	Correspondence with Eisner team re: A/R collections from owned portfolio analysis to be prepared	0.20	186.00
01/20/26	MM	E-mails with J. Grenen re: Cuarzo Portfolio A/R	0.20	211.00
01/20/26	MM	E-mail from M. Herald re: invoice for D&O coverage	0.10	105.50
01/20/26	MM	Telephone call with M. Herald re: update on Public Credit issue	0.20	211.00
01/20/26	JCH	Review and analysis of materials received from M. Herald re: D&O extension	0.20	186.00
01/20/26	JCH	Correspondence with J. Grenan, counsel to S&T, re: Cuarzo portfolio analysis and follow up re: same	0.20	186.00
01/22/26	JCH	Review and analysis of correspondence from counsel to Noble Care and correspondence from PA DHS re: cost report inquiries	0.20	186.00
01/22/26	MBD	Correspondence with E. Anderson re: cost report audit	0.20	147.00
01/23/26	MM	E-mails between M. DiSabatino and E. Anderson re: Department of Health audit request	0.20	211.00
01/24/26	MM	E-mails between M. Herald and E. Anderson re: Department of Health audit request	0.20	211.00
01/29/26	JCH	Review and analysis of disbursement inquiry raised by A. Wilen	0.20	186.00
TOTAL HOURS			16.70	

TIMEKEEPER TIME SUMMARY

<u>Timekeeper</u>	<u>Hours</u>		<u>Rate</u>		<u>Value</u>
Monique B. DiSabatino	0.50	at	735.00	=	367.50
Jeffrey C. Hampton	7.60	at	930.00	=	7,068.00
Clarence Y. Lee	1.80	at	710.00	=	1,278.00
Mark Minuti	6.80	at	1,055.00	=	7,174.00
CURRENT FEES					15,887.50
TOTAL AMOUNT OF THIS INVOICE					15,887.50

Guardian Elder Care at Johnstown, LLC
Michael Herald
c/o Michael J. Gerald, President & CEO
8796 US-219
Brockway, PA 15824

Invoice Number 4489773
Invoice Date 02/17/26
Client Number 391460
Matter Number 00005

Re: Case Administration

FOR PROFESSIONAL SERVICES RENDERED THROUGH 01/31/26:

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
01/02/26	MH	Draft agenda re: January omnibus hearing	0.90	342.00
01/05/26	MM	E-mail from M. Hanamirian to Chambers re: cancelling January 13 omnibus hearing	0.10	105.50
01/05/26	MBD	Review of agenda for upcoming hearing	0.10	73.50
01/05/26	MH	Draft Eisner November report certificate of no objection	0.10	38.00
01/05/26	MH	Correspondence to M. DiSabatino re: certification of no objection	0.10	38.00
01/05/26	MH	Revise preliminary agenda re: January omnibus	0.50	190.00
01/05/26	MH	Correspondence to M. DiSabatino re: January omnibus preliminary agenda	0.10	38.00
01/05/26	MH	Revise January omnibus preliminary agenda	0.20	76.00
01/06/26	PM	Review and revise, documents in accordance with the specific Court's Rules for this Court, and e-File on the online system of the United States Bankruptcy Court for the Western District of Pennsylvania, e-file Debtors' Notice of Preliminary Agenda of Matters Scheduled for Hearing on January 13, 2026 at 11:00 AM (ET) with all supporting documents on behalf of Debtor Guardian Elder Care at Johnstown, LLC (WDPA-BK 24-bk-70299).	0.50	170.00
01/06/26	MH	Correspondence to P. Markey re: preliminary agenda	0.10	38.00
01/07/26	MM	E-mails with M. DiSabatino and M. Hanamirian re: 1/13 omnibus hearing / motion to dismiss Public Credit's complaint	0.30	316.50
01/07/26	MM	E-mails between M. Hanamirian and Chambers re: 1/13 hearing	0.20	211.00
01/07/26	MM	Review of updated agenda for 1/13 hearing	0.20	211.00
01/07/26	MM	Conference with M. DiSabatino re: agenda for 1/13 hearing	0.20	211.00
01/07/26	JCH	Review and revise Saul Ewing December monthly submission	0.30	279.00
01/07/26	MBD	Correspondence with M. Minuti and M. Hanamirian re: hearing issues	0.20	147.00
01/07/26	MBD	Review of adversary docket for Public Credit matter	0.10	73.50

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
01/07/26	MBD	Revise amended agenda for upcoming hearing	0.40	294.00
01/07/26	MBD	Correspondence with Trust Array and M. Herald re: outstanding invoices	0.10	73.50
01/07/26	PM	Review and revise, documents in accordance with the specific Court's Rules for this Court, and e-File on the online system of the United States Bankruptcy Court for the Western District of Pennsylvania, e-file Debtors' Amended Notice of Preliminary Agenda of Matters Scheduled for Hearing on January 13, 2026 at 11:00 AM (ET) with all supporting documents on behalf of Debtor Guardian Elder Care at Johnstown, LLC (WDPA-BK 24-bk-70299).	0.50	170.00
01/07/26	MH	Analyze correspondence from M. Minuti re: agenda	0.10	38.00
01/07/26	MH	Confer with M. Shelton re: oral argument on motion to dismiss	0.10	38.00
01/07/26	MH	Correspondence to Court re: corrected agenda	0.20	76.00
01/07/26	MH	Revise preliminary agenda	0.40	152.00
01/07/26	MH	Correspondence to M. DiSabatino re: preliminary agenda	0.10	38.00
01/07/26	MH	Prepare amended agenda for filing	0.40	152.00
01/07/26	MH	Correspondence to Court re: preliminary agenda update	0.10	38.00
01/07/26	MH	Prepare amended agenda for filing	0.10	38.00
01/07/26	MH	Finalize hearing binder	0.10	38.00
01/07/26	MH	Correspondence to Omni re: serving preliminary agenda	0.10	38.00
01/08/26	MH	Confer with M. DiSabatino re: final agenda letter	0.10	38.00
01/08/26	MH	Draft final agenda	0.10	38.00
01/08/26	MH	Correspondence to M. DiSabatino re: final agenda	0.10	38.00
01/08/26	MH	Correspondence to P. Markey re: filing final agenda	0.10	38.00
01/09/26	MM	Review of final agenda for 1/13 hearing	0.10	105.50
01/09/26	MM	E-mail from M. Hanamirian to Chambers re: 1/13 agenda	0.10	105.50
01/09/26	MM	E-mail to R. Warren re: 1/13 transcript	0.10	105.50
01/09/26	PM	Review and revise, documents in accordance with the specific Court's Rules for this Court, and e-File on the online system of the United States Bankruptcy Court for the Western District of Pennsylvania, e-file Debtors' Final Notice of Preliminary Agenda of Matters Scheduled for Hearing on January 13, 2026 at 11:00 AM (ET) with all supporting documents on behalf of Debtor Guardian Elder Care at Johnstown, LLC (WDPA-BK 24-bk-70299).	0.60	204.00
01/09/26	MH	Correspondence to R. Warren re: November fee application	0.10	38.00
01/09/26	MH	Correspondence to Omni re: serving agenda	0.10	38.00

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
01/09/26	MH	Correspondence to Court re: agenda	0.10	38.00
01/09/26	MH	Correspondence to R. Warren re: fee application	0.10	38.00
01/13/26	MH	Analyze status conference hearing scheduled by Court	0.10	38.00
01/14/26	PM	Final review and organizing documents and exhibits for Debtors' Report by Eisner Advisory Group LLC of Compensation Earned and Expenses Incurred for the Period of December 1, 2025, through December 31, 2025, on behalf of Debtor Guardian Elder Care at Johnstown, LLC (WDPA-BK 24-bk-70299).	0.40	136.00
01/14/26	PM	Review and revise, documents in accordance with the specific Court's Rules for this Court, and e-File on the online system of the United States Bankruptcy Court for the Western District of Pennsylvania, e-file Debtors' Report by Eisner Advisory Group LLC of Compensation Earned and Expenses Incurred for the Period of December 1, 2025 through December 31, 2025 with all supporting documents on behalf of Debtor Guardian Elder Care at Johnstown, LLC (WDPA-BK 24-bk-70299).	0.60	204.00
01/14/26	MH	Correspondence to P. Markey re: Eisner December report	0.10	38.00
01/14/26	MH	Correspondence to Omni re: serving Eisner report	0.10	38.00
01/27/26	MBD	Correspondence to Omni re: service of 9019 motion	0.20	147.00
01/27/26	PM	Final review and organizing documents and exhibits for Debtors' Joint Motion for Order Approving Settlement Pursuant to Rule 9019 of the Federal Rules of Bankruptcy Procedure on behalf of Debtor Guardian Elder Care at Johnstown, LLC (WDPA-BK 24-bk-70299).	0.40	136.00
01/27/26	PM	Review and revise, documents in accordance with the specific Court's Rules for this Court, and e-File on the online system of the United States Bankruptcy Court for the Western District of Pennsylvania, e-file Debtors' Joint Motion for Order Approving Settlement Pursuant to Rule 9019 of the Federal Rules of Bankruptcy Procedure with all supporting documents on behalf of Debtor Guardian Elder Care at Johnstown, LLC (WDPA-BK 24-bk-70299).	0.60	204.00
01/27/26	MH	Correspondence to M. DiSabatino re: settlement motion	0.10	38.00
01/27/26	MH	Correspondence to Omni re: serving 9019 motion	0.10	38.00
01/28/26	PM	Final review and organizing documents for MORs (Chapter 11 Monthly Operating Report for the Month Ending: 11/30/2025) on behalf of Debtor Guardian Elder Care at Johnstown, LLC for All 44 cases related to case WDPA-BK 24-70299.	4.00	1,360.00
01/29/26	PM	Review and revise, documents in accordance with the specific Court's Rules for this Court, and e-File on the online system of the United States Bankruptcy Court for the Western District of Pennsylvania, e-file Debtors' MORs (Chapter 11 Monthly Operating Report for the Month Ending: 11/30/2025) with all supporting documents on behalf of Debtor Guardian Elder Care at Johnstown, LLC for All 44 cases: WDPA-BK 24-70299; WDPA-BK 24-70301; WDPA-BK 24-70302; WDPA-BK 24-70303; WDPA-BK 24-70304; WDPA-BK 24-70305; WDPA-BK 24-21812; WDPA-BK 24-21815; WDPA-BK 24-10420; WDPA-BK 24-21813; WDPA-BK 24-21816; WDPA-BK 24-70300; WDPA-BK 24-21817; WDPA-BK 24-21818; WDPA-BK 24-21819; WDPA-BK 24-	4.00	1,360.00

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
		21820; WDPa-BK 24-10421; WDPa-BK 24-10422; WDPa-BK 24-10423; WDPa-BK 24-10424; WDPa-BK 24-21821; WDPa-BK 24-21822; WDPa-BK 24-21823; WDPa-BK 24-21824; WDPa-BK 24-10425; WDPa-BK 24-10426; WDPa-BK 24-10427; WDPa-BK 24-21825; WDPa-BK 24-10428; WDPa-BK 24-21826; WDPa-BK 24-10429; WDPa-BK 24-10430; WDPa-BK 24-10431; WDPa-BK 24-10432; WDPa-BK 24-10433; WDPa-BK 24-10434; WDPa-BK 24-10435; WDPa-BK 24-10436; WDPa-BK 24-10437; WDPa-BK 24-10438; WDPa-BK 24-10439; WDPa-BK 24-10440; WDPa-BK 24-10441; WDPa-BK 24-10442.		
01/29/26	PM	Review and revise, documents in accordance with the specific Court's Rules for this Court, and e-File on the online system of the United States Bankruptcy Court for the Western District of Pennsylvania, e-file Debtors' Certification of No Objection to Report by Eisner Advisory Group LLC of Compensation Earned and Expenses Incurred for the Period of December 1, 2025 through December 31, 2025 with all supporting documents on behalf of Debtor Guardian Elder Care at Johnstown, LLC (WDPa-BK 24-bk-70299).	0.50	170.00
01/29/26	MH	Draft certification of no objection re: Eisner report	0.10	38.00
01/29/26	MH	Correspondence to M. DiSabatino re: Eisner certification of no objection	0.10	38.00
01/29/26	MH	Correspondence to Omni re: serving monthly operating reports	0.10	38.00
01/29/26	MH	Prepare Eisner CNO for filing	0.10	38.00
01/29/26	MH	Correspondence to Omni re: serving Eisner CNO	0.10	38.00
01/30/26	PM	Final review and organizing documents and exhibits for Debtors' Sixteenth Monthly Fee Application of Saul Ewing LLP, Counsel to the Debtors, for Allowance of Compensation and Reimbursement of Expenses for the Period from November 1, 2025, through November 30, 2025, on behalf of Debtor Guardian Elder Care at Johnstown, LLC (WDPa-BK 24-bk-70299).	0.40	136.00
01/30/26	PM	Review and revise, documents in accordance with the specific Court's Rules for this Court, and e-File on the online system of the United States Bankruptcy Court for the Western District of Pennsylvania, e-file Debtors' Sixteenth Monthly Fee Application of Saul Ewing LLP, Counsel to the Debtors, for Allowance of Compensation and Reimbursement of Expenses for the Period from November 1, 2025 through November 30, 2025 with all supporting documents on behalf of Debtor Guardian Elder Care at Johnstown, LLC (WDPa-BK 24-bk-70299).	0.60	204.00
01/30/26	MH	Prepare 16th monthly fee application for filing	0.10	38.00
01/30/26	MH	Correspondence to Omni re: serving 16th monthly fee application	0.10	38.00
TOTAL HOURS			21.50	

391460 Guardian Elder Care at Johnstown, LLC
00005 Case Administration
02/17/26

Invoice Number 4489773
Page: 5

TIMEKEEPER TIME SUMMARY

Timekeeper	Hours		Rate		Value
Monique B. DiSabatino	1.10	at	735.00	=	808.50
Jeffrey C. Hampton	0.30	at	930.00	=	279.00
Maxwell Hanamirian	5.70	at	380.00	=	2,166.00
Patricia Markey	13.10	at	340.00	=	4,454.00
Mark Minuti	1.30	at	1,055.00	=	1,371.50
CURRENT FEES					9,079.00
TOTAL AMOUNT OF THIS INVOICE					9,079.00

SAUL EWING

LLP

Guardian Elder Care at Johnstown, LLC
Michael Herald
c/o Michael J. Gerald, President & CEO
8796 US-219
Brockway, PA 15824

Invoice Number 4489774
Invoice Date 02/17/26
Client Number 391460
Matter Number 00006

Re: Claims Analysis, Objections, Proofs of Claim

FOR PROFESSIONAL SERVICES RENDERED THROUGH 01/31/26:

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
01/27/26	MBD	Correspondence with T. Pohl re: Trufly matter	0.20	147.00
01/29/26	MBD	Correspondence with M. Herald re: Ohio Attorney General notice	0.10	73.50
TOTAL HOURS			0.30	

TIMEKEEPER TIME SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Value</u>
Monique B. DiSabatino	0.30 at	735.00 =	220.50
CURRENT FEES			220.50
TOTAL AMOUNT OF THIS INVOICE			220.50

Guardian Elder Care at Johnstown, LLC
Michael Herald
c/o Michael J. Gerald, President & CEO
8796 US-219
Brockway, PA 15824

Invoice Number 4489775
Invoice Date 02/17/26
Client Number 391460
Matter Number 00007

Re: Committee Matters

FOR PROFESSIONAL SERVICES RENDERED THROUGH 01/31/26:

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
01/02/26	MM	E-mails with B. Stassen re: status of settlement agreement	0.20	211.00
01/02/26	JCH	Review status of settlement agreement re: DIP claims	0.10	93.00
01/05/26	MM	E-mails with Committee counsel re: finalizing 9019 motion and other open issues	0.20	211.00
01/05/26	JCH	Correspondence with committee counsel re: settlement and plan issue	0.10	93.00
01/06/26	MM	Zoom call with Committee counsel re: Public Credit issues / D&O settlement	0.60	633.00
01/06/26	MM	Review of files for negotiations over Owned Portfolio sale order	0.50	527.50
01/06/26	MM	E-mail to Committee counsel re: changes to Owned Portfolio sale order	0.20	211.00
01/06/26	MM	E-mails with Committee counsel re: unpaid nursing home assessments	0.20	211.00
01/06/26	JCH	Conference with committee counsel re: settlement and plan issues	0.60	558.00
01/06/26	JCH	Review file materials re: information response to follow up requests of committee counsel	0.60	558.00
01/07/26	MM	E-mails with B. Stasser re: status of settlement agreement	0.20	211.00
01/07/26	MM	E-mails between K. Burkley and B. Stasser re: D&O settlement	0.20	211.00
01/07/26	JCH	Telephone call from committee counsel, A. Sherman, re: Public Credit loan agreement issue and review same	0.30	279.00
01/12/26	MM	E-mail from A. Sherman to W. Stasser re: status of D&O settlement	0.10	105.50
01/13/26	MM	Call and e-mails with the parties to finalize D&O settlement	0.20	211.00
01/13/26	MM	E-mails with J. Hampton and Committee counsel re: D&O settlement	0.10	105.50
01/13/26	MM	E-mail from Committee counsel to Judge Fitzgerald re: D&O settlement	0.10	105.50
01/13/26	MM	E-mails with the parties to schedule call with Judge Fitzgerald re: D&O settlement	0.20	211.00
01/13/26	MM	Review of, revise and circulate D&O settlement agreement	0.50	527.50

391460
00007
02/17/26

Guardian Elder Care at Johnstown, LLC
Committee Matters

Invoice Number 4489775
Page: 2

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
01/13/26	MM	E-mails with Judge Fitzgerald re: resolution of D&O settlement issue	0.20	211.00
01/14/26	MM	Telephone call with A. Sherman re: flow of funds from HUD closing	0.20	211.00
01/16/26	MM	E-mails with D&O's counsel and Committee counsel re: settlement / signature pages	0.20	211.00
01/20/26	MM	E-mails from L. Berret re: A/R collection / aging for Committee information request	0.20	211.00
01/20/26	MM	Review of A/R collection material for Committee information request	0.20	211.00
01/20/26	MM	E-mail to J. Hampton re: A/R collection for Committee information request	0.10	105.50
01/20/26	MM	Telephone call with J. Hampton re: A/R collection analysis for Committee information request	0.20	211.00
01/20/26	JCH	Correspondence with L. Berett re: committee waterfall analysis and response to same	0.20	186.00
01/20/26	JCH	Review and analysis of materials prepared by L. Berret of Eisner re: committee information request	0.30	279.00
01/26/26	MM	E-mails with Committee counsel re: finalizing D&O 9019 motion	0.20	211.00
01/26/26	MM	Call with L. Berret re: A/R collections	0.20	211.00
01/26/26	MM	Zoom call with J. Hampton and L. Berret re: A/R collection at HUD and non-HUD properties	0.40	422.00
01/26/26	MM	Call with J. Hampton re: documents in response to Committee complaint	0.20	211.00
01/26/26	MM	E-mail from L. Berret re: A/R collections / HUD closing waterfall	0.20	211.00
01/26/26	MM	Draft e-mail to Committee and Public Credit re: information on A/R and sale proceeds	0.30	316.50
01/26/26	MM	Finalize and send information to Committee and Public Credit on A/R and sale proceeds	0.20	211.00
01/26/26	JCH	Conference with M. Minuti re: committee complaint and documents in response to same	0.20	186.00
01/26/26	JCH	Review and analysis of owned portfolio sale closing documents and analysis of materials in response to mediation	0.30	279.00
01/26/26	JCH	Conference with L. Berret re: review materials for committee information request	0.40	372.00
01/26/26	JCH	Review updated settlement motion draft and correspondence with committee counsel re: same	0.20	186.00
01/27/26	MM	Telephone call with A. Sherman re: A/R issue	0.30	316.50
01/27/26	MM	Telephone call with J. Hampton re: A/R / Committee issue	0.30	316.50
TOTAL HOURS			10.40	

391460 Guardian Elder Care at Johnstown, LLC
00007 Committee Matters
02/17/26

Invoice Number 4489775
Page: 3

TIMEKEEPER TIME SUMMARY

Timekeeper	Hours		Rate		Value
Jeffrey C. Hampton	3.30	at	930.00	=	3,069.00
Mark Minuti	7.10	at	1,055.00	=	7,490.50
CURRENT FEES					10,559.50
TOTAL AMOUNT OF THIS INVOICE					10,559.50

SAUL EWING

LLP

Guardian Elder Care at Johnstown, LLC
Michael Herald
c/o Michael J. Gerald, President & CEO
8796 US-219
Brockway, PA 15824

Invoice Number 4489776
Invoice Date 02/17/26
Client Number 391460
Matter Number 00008

Re: Creditor Inquiries

FOR PROFESSIONAL SERVICES RENDERED THROUGH 01/31/26:

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
01/21/26	MBD	Correspondence with counsel to Cardinal Health re: case status	0.20	147.00
TOTAL HOURS			0.20	

TIMEKEEPER TIME SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Value</u>
Monique B. DiSabatino	0.20 at	735.00 =	147.00
CURRENT FEES			147.00
TOTAL AMOUNT OF THIS INVOICE			147.00

SAUL EWING

LLP

Guardian Elder Care at Johnstown, LLC
Michael Herald
c/o Michael J. Gerald, President & CEO
8796 US-219
Brockway, PA 15824

Invoice Number 4489777
Invoice Date 02/17/26
Client Number 391460
Matter Number 00012

Re: Fee/Employment Applications (Saul Ewing)

FOR PROFESSIONAL SERVICES RENDERED THROUGH 01/31/26:

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
01/07/26	JCH	Review and revise Saul Ewing December monthly submission	0.20	186.00
01/25/26	MH	Revise November fee application	0.60	228.00
01/25/26	MH	Correspondence to J. Hampton re: fee applications	0.10	38.00
01/25/26	MH	Revise November fee application	0.20	76.00
01/26/26	MH	Draft December 2025 fee application	0.50	190.00
01/26/26	MH	Correspondence to R. Warren re: November fee application	0.10	38.00
01/27/26	MH	Revise 16th monthly fee application	0.30	114.00
01/30/26	MBD	Revise Saul Ewing's monthly fee application	0.20	147.00
TOTAL HOURS			2.20	

TIMEKEEPER TIME SUMMARY

<u>Timekeeper</u>	<u>Hours</u>		<u>Rate</u>		<u>Value</u>
Monique B. DiSabatino	0.20	at	735.00	=	147.00
Jeffrey C. Hampton	0.20	at	930.00	=	186.00
Maxwell Hanamirian	1.80	at	380.00	=	684.00
CURRENT FEES					1,017.00

TOTAL AMOUNT OF THIS INVOICE 1,017.00

SAUL EWING

LLP

Guardian Elder Care at Johnstown, LLC
Michael Herald
c/o Michael J. Gerald, President & CEO
8796 US-219
Brockway, PA 15824

Invoice Number 4489778
Invoice Date 02/17/26
Client Number 391460
Matter Number 00013

Re: Fee/Employment Applications (Other Professionals)

FOR PROFESSIONAL SERVICES RENDERED THROUGH 01/31/26:

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
01/12/26	MH	Draft Eisner December report	0.20	76.00
01/12/26	MH	Correspondence to M. DiSabatino re: Eisner December report	0.10	38.00
01/13/26	MBD	Review of draft Eisner staffing report	0.10	73.50
TOTAL HOURS			0.40	

TIMEKEEPER TIME SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Value</u>
Monique B. DiSabatino	0.10 at 735.00 =		73.50
Maxwell Hanamirian	0.30 at 380.00 =		114.00
CURRENT FEES			187.50
TOTAL AMOUNT OF THIS INVOICE			187.50

Guardian Elder Care at Johnstown, LLC
Michael Herald
c/o Michael J. Gerald, President & CEO
8796 US-219
Brockway, PA 15824

Invoice Number 4489779
Invoice Date 02/17/26
Client Number 391460
Matter Number 00016

Re: Litigation: Contested Matters and Adverse Proceedings

FOR PROFESSIONAL SERVICES RENDERED THROUGH 01/31/26:

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
01/02/26	MM	E-mail to M. Herald re: SEIU subpoena issues	0.20	211.00
01/02/26	MM	Call with R. Gill re: production of documents	0.20	211.00
01/02/26	MM	E-mail to R. Gill re: SEIU subpoena	0.10	105.50
01/02/26	MM	E-mails with C. Mears re: service of documents	0.20	211.00
01/02/26	MM	Review of "final" OTAs and PSAs in connection with SEIU subpoenas	0.30	316.50
01/02/26	MM	Further e-mails with M. Herald re: SEIU subpoenas	0.20	211.00
01/02/26	MM	Draft letter to Omega and Noble re: document production	0.60	633.00
01/02/26	MM	Call and further e-mails with C. Mears re: production of documents	0.30	316.50
01/02/26	MM	Draft e-mail to SEIU re: production in response to subpoena	0.20	211.00
01/02/26	MM	Further e-mails with R. Gill re: responding to SEIU subpoena	0.20	211.00
01/05/26	MM	Finalize letter and e-mail re: response to SEIU subpoenas	0.50	527.50
01/05/26	MM	Finalize and send correspondence related to SEIU subpoena	0.20	211.00
01/05/26	MM	E-mail to V. Gupta re: SEIU subpoena	0.10	105.50
01/05/26	CAM	Prepare documents for production within relativity workspace	1.20	450.00
01/06/26	MM	Telephone call with M. Herald re: SEIU subpoena / update call with Committee	0.20	211.00
01/06/26	MM	E-mails with C. Mears re: production of SEIU documents / timeline	0.20	211.00
01/06/26	MM	E-mail from C. Mears re: production of SEIU responsive documents	0.10	105.50
01/06/26	MM	E-mail to Noble Care re: link to new responsive documents	0.10	105.50
01/06/26	CAM	Produce documents from relativity workplace by way of request of case team	1.70	637.50
01/07/26	MM	Review of Committee's opposition to motion to dismiss Public Credit's complaint	0.30	316.50

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00016
02/17/26

Guardian Elder Care at Johnstown, LLC
Litigation: Contested Matters and Adverse Proceedings

Invoice Number 4489779
Page: 2

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
01/07/26	MM	E-mail to L. Aiken re: documents responsive to SEIU subpoena	0.20	211.00
01/07/26	MM	E-mails with C. Mears re: providing access to SEIU documents	0.20	211.00
01/07/26	CAM	Case closure procedures	1.50	562.50
01/08/26	MM	E-mail from Omega's counsel re: documents responsive to SEIU subpoena	0.20	211.00
01/13/26	MM	Review of, revise and circulate 9019 motion for D&O settlement	0.50	527.50
01/13/26	MM	E-mail to M. Herald and A. Wilen re: report on hearing on motion to dismiss Public Credit complaint	0.20	211.00
01/13/26	MM	Telephone call with J. Hampton re: outcome of hearing on motion to dismiss Public Credit complaint	0.20	211.00
01/13/26	JCH	Conference with M. Minuti re: status of settlement agreement approval by carrier and correspondence with committee counsel re: same	0.20	186.00
01/13/26	JCH	Review correspondence with mediator re: settlement agreement status	0.10	93.00
01/13/26	JCH	Correspondence and conference with M. Minuti re: update from hearing on Public Credit motion to dismiss	0.20	186.00
01/13/26	JCH	Review correspondence from counsel to carrier re: final settlement agreement sign off	0.10	93.00
01/13/26	MBD	Review of correspondence from M. Minuti re: Public Credit hearing	0.10	73.50
01/14/26	MM	Call and e-mail with J. Lofgren re: A/R issues	0.30	316.50
01/14/26	MM	Review of closing statement for HUD closing	0.20	211.00
01/14/26	MM	E-mail to L. Berret re: A/R balances	0.20	211.00
01/14/26	MM	Call with L. Berret re: A/R analysis	0.20	211.00
01/14/26	MM	Further e-mails with L. Berret re: A/R information needed	0.20	211.00
01/14/26	MM	Review of sale order and DIP order re: proceeds	0.20	211.00
01/14/26	MM	Review of A/R balances as of 3/31/24 and 7/31/24	0.30	316.50
01/14/26	MM	E-mails from L. Berret re: HUD and non-HUD A/R collections	0.20	211.00
01/14/26	MM	Call with J. Hampton re: Public Credit litigation	0.30	316.50
01/14/26	JCH	Review and analysis of Public Credit position re: collateral analysis	0.20	186.00
01/14/26	JCH	Review and analysis of committee position re: Public Credit paydown	0.20	186.00
01/14/26	JCH	Conference with M. Minuti re: Public Credit dispute and analysis of collateral issues re: same	0.30	279.00
01/14/26	JCH	Conference with L. Berret re: accounts receivable analysis	0.20	186.00
01/15/26	MM	E-mails between L. Berret and J. Hampton re: Owned Portfolio A/R	0.20	211.00

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
01/15/26	MM	E-mails with Noble's counsel re: link to documents responsive to SEIU subpoena	0.20	211.00
01/15/26	MM	E-mails with C. Mears re: access to SEIU documents	0.20	211.00
01/15/26	MM	E-mails with Committee counsel re: new mediation dates for Public Credit matter	0.20	211.00
01/16/26	MM	E-mail from K. Burkley re: possible mediation of Public Credit Issues	0.10	105.50
01/16/26	MM	E-mails with counsel for Century re: no objection to production of SEIU documents	0.20	211.00
01/16/26	MM	Draft response to SEIU subpoena	0.80	844.00
01/16/26	MM	Finalize and serve response to SEIU subpoena	0.30	316.50
01/16/26	MM	E-mails with C. Mears re: service of SEIU documents	0.20	211.00
01/16/26	MM	E-mail to M. Herald re: responding to SEIU subpoena	0.10	105.50
01/16/26	JCH	Review and analysis of Guardian response and objection to SEIU subpoena	0.20	186.00
01/22/26	MM	E-mails with W. Stasser re: settlement motion	0.20	211.00
01/22/26	JCH	Review correspondence from B. Stassen, counsel to carrier, re: settlement agreement sign off	0.10	93.00
01/23/26	JCH	Correspondence with client team re: finalized settlement implementation	0.10	93.00
01/26/26	MM	E-mails with J. Hampton re: A/R information for Committee	0.20	211.00
01/26/26	MM	Review of and revise 9019 motion	0.20	211.00
01/26/26	MM	Telephone call with A. Sherman re: filing 9019 motion	0.20	211.00
01/26/26	MM	E-mail with A. Wilen and M. Herald re: 9019 motion	0.20	211.00
01/26/26	MM	E-mails with M. DiSabatino re: finalizing 9019 motion	0.20	211.00
01/26/26	MM	E-mails with M. DiSabatino re: settlement motion	0.20	211.00
01/26/26	MM	E-mails with M. DiSabatino re: changes to settlement agreement and 9019 motion	0.20	211.00
01/26/26	JCH	Correspondence with M. Herald and A. Wilen re: mediation settlement implementation issue	0.10	93.00
01/26/26	JCH	Review and analysis of updated documents to provide to Committee re: Public Credit dispute	0.10	93.00
01/26/26	MBD	Revise D&O settlement agreement	0.90	661.50
01/26/26	MBD	Revise settlement motion re: D&O settlement	1.70	1,249.50
01/26/26	MBD	Review of correspondence from M. Minuti documents re: responsive to discovery requests in Public Credit adversary	0.10	73.50
01/27/26	MM	E-mails with M. DiSabatino re: 9019 motion	0.20	211.00

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
01/27/26	MM	E-mails with Committee counsel re: 9019 motion	0.20	211.00
01/27/26	MM	E-mails with M. DiSabatino re: contact information for D&O counsel	0.20	211.00
01/27/26	JCH	Review correspondence with committee counsel re: revisions to settlement motion	0.10	93.00
01/27/26	JCH	Conference with M Minuti re: committee follow up re: Public Credit information and review same	0.30	279.00
01/27/26	MBD	Correspondence with M. Minuti re: settlement motion	0.20	147.00
01/27/26	MBD	Finalize settlement motion in preparation for filing	0.40	294.00
			TOTAL HOURS	22.80

TIMEKEEPER TIME SUMMARY

<u>Timekeeper</u>	<u>Hours</u>		<u>Rate</u>		<u>Value</u>
Monique B. DiSabatino	3.40	at	735.00	=	2,499.00
Jeffrey C. Hampton	2.50	at	930.00	=	2,325.00
Mark Minuti	12.50	at	1,055.00	=	13,187.50
eDiscovery Project Manager - EDPM	4.40	at	375.00	=	1,650.00
					CURRENT FEES
					19,661.50
					TOTAL AMOUNT OF THIS INVOICE
					19,661.50

SAUL EWING

LLP

Guardian Elder Care at Johnstown, LLC
Michael Herald
c/o Michael J. Gerald, President & CEO
8796 US-219
Brockway, PA 15824

Invoice Number 4489780
Invoice Date 02/17/26
Client Number 391460
Matter Number 00018

Re: Plan and Disclosure Statement

FOR PROFESSIONAL SERVICES RENDERED THROUGH 01/31/26:

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
01/05/26	JCH	Review case status re: settlement agreement and re: implementation issues	0.30	279.00
			<u>TOTAL HOURS</u>	<u>0.30</u>

TIMEKEEPER TIME SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>at</u>	<u>Rate</u>	<u>=</u>	<u>Value</u>	
Jeffrey C. Hampton	0.30	at	930.00	=	279.00	
					<u>CURRENT FEES</u>	<u>279.00</u>
					<u>TOTAL AMOUNT OF THIS INVOICE</u>	<u>279.00</u>

SAUL EWING

LLP

Guardian Elder Care at Johnstown, LLC
Michael Herald
c/o Michael J. Gerald, President & CEO
8796 US-219
Brockway, PA 15824

Invoice Number 4489781
Invoice Date 02/17/26
Client Number 391460
Matter Number 00019

Re: Preparation for and attendance at hearings

FOR PROFESSIONAL SERVICES RENDERED THROUGH 01/31/26:

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
01/13/26	MM	Attend hearing on Public Credit's motion to dismiss Committee' adversary proceeding	1.90	2,004.50
			<u>TOTAL HOURS</u>	<u>1.90</u>

TIMEKEEPER TIME SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Value</u>	
Mark Minuti	1.90	at 1,055.00	= 2,004.50	
			<u>CURRENT FEES</u>	<u>2,004.50</u>
			<u>TOTAL AMOUNT OF THIS INVOICE</u>	<u>2,004.50</u>

SAUL EWING

LLP

Guardian Elder Care at Johnstown, LLC
Michael Herald
c/o Michael J. Gerald, President & CEO
8796 US-219
Brockway, PA 15824

Invoice Number 4489782
Invoice Date 02/17/26
Client Number 391460
Matter Number 00022

Re: UST Reports, Meetings and Issues

FOR PROFESSIONAL SERVICES RENDERED THROUGH 01/31/26:

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
01/22/26	MM	E-mail from US Trustee re: monthly operating reports	0.10	105.50
01/22/26	JCH	Review and analysis of correspondence from US Trustee analyst re: analysis of quarterly fees overpayment	0.20	186.00
01/22/26	MBD	Analyze correspondence from US Trustee re: quarterly fee credit allocation	0.20	147.00
01/26/26	MBD	Review of draft November monthly operating reports in preparation for filing	0.40	294.00
TOTAL HOURS			0.90	

TIMEKEEPER TIME SUMMARY

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Value</u>
Monique B. DiSabatino	0.60 at	735.00 =	441.00
Jeffrey C. Hampton	0.20 at	930.00 =	186.00
Mark Minuti	0.10 at	1,055.00 =	105.50
CURRENT FEES			732.50

TOTAL AMOUNT OF THIS INVOICE 732.50

SAUL EWING

LLP

Guardian Elder Care at Johnstown, LLC
Michael Herald
c/o Michael J. Gerald, President & CEO
8796 US-219
Brockway, PA 15824

Invoice Number 4489771
Invoice Date 02/17/26
Client Number 391460
Matter Number 00002

Re: Expenses

FOR COSTS ADVANCED AND EXPENSES INCURRED:

01/14/26	Vendor: Federal Express; 1/05/2026 - Federal Express To: Chief Operating Officer From: Mark Minuti	22.31
01/14/26	Vendor: Federal Express; 1/05/2026 - Federal Express To: Eric M Anderson From: Mark Minuti	22.31
	Total Federal Express	44.62
	Epiq Relativity eDiscovery Costs	346.35
	CURRENT EXPENSES	390.97
	TOTAL AMOUNT OF THIS INVOICE	390.97

EXHIBIT B

DECLARATION

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

In re

GUARDIAN ELDER CARE AT
JOHNSTOWN, LLC, d/b/a/ RICHLAND
HEALTHCARE AND REHABILITATION
CENTER, *et al.*,

Debtors.¹

GUARDIAN ELDER CARE AT
JOHNSTOWN, LLC, d/b/a/ RICHLAND
HEALTHCARE AND REHABILITATION
CENTER, *et al.*,

v.

NO RESPONDENT

Chapter 11

Case No. 24-70299 (JAD)

Jointly Administered

DECLARATION OF JEFFREY C. HAMPTON

1. I am a Partner in the firm of Saul Ewing LLP (“**Saul Ewing**”), which serves as counsel to the debtors and debtors-in-possession (the “**Debtors**”).

2. I have read the foregoing application of Saul Ewing for allowance of compensation and reimbursement of expenses and know the contents thereof and that the same are true and correct, to the best of my knowledge, information and belief.

3. There is no agreement or understanding between Saul Ewing and any other person for a division of compensation as Debtors’ counsel.

4. No division prohibited by the Bankruptcy Code will be made by Saul Ewing.

¹ The last four digits of Guardian Elder Care at Johnstown, LLC d/b/a Richland Healthcare and Rehabilitation Center’s federal tax identification number are 7907. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://omniagentsolutions.com/Guardian>. The Debtors’ mailing address is: 8796 Route 219, Brockway, Pennsylvania 15824.

5. No agreement prohibited by Title 18, Section 155 has been made.

Dated: March 4, 2026

/s/ Jeffrey C. Hampton

JEFFREY C. HAMPTON