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The following constitutes the order of the Court.
Signed: January 6, 2022

M. Elaine Hammond
U.S. Bankruptcy Judge

Proposed Attorneys for Debtors and
Debtors in Possession

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

In re:

WATSONVILLE HOSPITAL
CORPORATION, *et al.*,

Debtors.¹

Case No. 21-51477

Chapter 11
(Jointly Administered)

**ORDER (I) ESTABLISHING DEADLINES
FOR FILING OF PROOFS OF CLAIM,
INCLUDING SECTION 503(b)(9)
CLAIMS, AND (II) APPROVING THE
FORM AND MANNER OF NOTICE OF
BAR DATE**

Upon the motion (the "Motion")² of the Debtors for entry of an order (this "Order") pursuant to sections 105(a), 501, 502, 503, and 1111(a) of the Bankruptcy Code, Bankruptcy Rules 2002 and 3003(c)(3), and Bankruptcy Local Rule 3003-1: (i) establishing deadlines for filing claims against the Debtors in the Bankruptcy Cases, and (ii) approving the form and manner of notice thereof; and the Court having found it has jurisdiction to consider the Motion and the relief requested therein pursuant

¹ The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: Watsonville Hospital Corporation (4113); Watsonville Healthcare Management, LLC (4168); Watsonville Hospital Holdings, Inc. (1118); and Halsen Healthcare, LLC. The Debtors' business address is 75 Nielson Street, Watsonville, CA 95076.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

1 to 28 U.S.C. §§ 157 and 1334; and due and sufficient notice of the Motion having been given under
2 the particular circumstances; and it appearing that no other or further notice is necessary; and it
3 appearing that the relief requested in the Motion is in the best interests of the Debtors, their estates,
4 their creditors, and other parties-in-interest; and after due deliberation thereon; and good and sufficient
5 cause appearing therefor; it is hereby

6 **ORDERED, ADJUDGED, AND DECREED** that:

7 1. The Motion is GRANTED as set forth herein.

8 2. **General Bar Date**. Pursuant to Bankruptcy Rule 3003(c)(3), all persons and entities,
9 except any governmental unit, that hold or wish to assert a claim arising (or deemed to arise) on or
10 before the Petition Date, including any claim arising under section 503(b)(9) of the Bankruptcy Code,
11 are required to file with the Debtors' claims and noticing agent, Stretto, Inc. (the "Claims Agent" or
12 "Stretto"), **on or before April 4, 2022 at 4:00 p.m. (Pacific Time)** (the "General Bar Date"), a
13 completed and executed Proof of Claim Form, in substantially the form attached hereto as **Exhibit C**,
14 on account of any such claim in accordance with the procedures set forth below.

15 3. **Governmental Bar Date**. Pursuant to Bankruptcy Rule 3003(c) and section 502(b)(9)
16 of the Bankruptcy Code, all governmental units that hold or wish to assert a claim arising (or deemed
17 to arise) on or before the Petition Date against the Debtors are required to file with the Claims Agent
18 **on or before June 3, 2022 at 4:00 p.m. (Eastern Time)** (the "Governmental Bar Date"), a completed
19 and executed Proof of Claim Form in substantially the form attached hereto as **Exhibit C**, on account
20 of any such claim in accordance with the procedures set forth below.

21 4. **Amended Schedules Bar Date**. If the Debtors amend their Schedules to change the
22 amount, nature, classification or characterization of a claim, or to schedule a new claim, the affected
23 claimant shall be permitted to dispute the amount, nature, classification or characterization of the
24 scheduled claim by filing with Stretto a completed and executed Proof of Claim Form in substantially
25 the form attached hereto as **Exhibit C** on or before the later of (a) the General Bar Date or (b) thirty
26 (30) days from the date notice is served alerting the affected creditor of the amendment to the
27 Schedules. If the Debtors amend the Schedules with respect to the claim of a governmental unit, the
28 affected governmental unit shall be permitted to dispute the amount, nature, classification or

1 characterization of the scheduled claim by filing with Stretto a completed and executed Proof of Claim
2 Form in substantially the form attached hereto as **Exhibit C** on or before the later of (a) the
3 Governmental Bar Date or (b) thirty (30) days from the date notice is served alerting the affected
4 governmental unit of the applicable amendment to the Schedules.

5 **5. Rejection Bar Date.** Pursuant to Bankruptcy Rule 3003(c), each person or entity
6 (including, without limitation, each individual, partnership, joint venture, corporation, limited liability
7 company, estate, and trust) holding or asserting a claim for any rejection damages arising from the
8 rejection of any unexpired lease or executory contract of a Debtor (an “Agreement”) during the
9 Bankruptcy Cases must file a Proof of Claim Form so that it is *actually received* by Stretto on or before
10 the later of (a) 30 days after the entry of an order authorizing rejection of such Agreement or pursuant
11 to a notice under procedures approved by this Court, (b) any date set by another order of this Court,
12 or (c) the General Bar Date or the Governmental Bar Date, whichever is applicable.

13 **6.** The following persons or entities are not required to file a Proof of Claim Form in
14 accordance with the procedures set forth herein:

- 15 a) any person or entity that has already properly filed a proof of claim with Stretto or the
16 Clerk of the Court for the United States Bankruptcy Court for the Northern District of
California in a form substantially similar to Official Form 410;
- 17 b) any person or entity whose claim is listed in the Debtors’ Schedules and (i) the claim
18 is not described in the Schedules as “disputed,” “contingent,” or “unliquidated,” and
19 (ii) such person or entity agrees with the amount, nature, and priority of the claim set
forth in the Schedules;
- 20 c) any person or entity whose claim has been allowed by Court order on or before the
applicable Bar Date;
- 21 d) any person or entity whose claim has been satisfied in full by the Debtors or any other
22 party prior to the applicable Bar Date;
- 23 e) any holder of a claim for which the Court has already fixed a specific deadline to file a
proof of claim;
- 24 f) the MPT Prepetition Lender, the CNH Prepetition Lender, the DIP Lender and any
25 successors thereto, with respect to claims arising from or concerning the loan
agreements referenced in the DIP Financing Motion (including the MPT Prepetition
26 Obligations);
- 27 g) an employee of a Debtor if an order of the Court authorized such Debtor to honor the
28 employee’s claim in the ordinary course of business, and the Debtor actually paid such
claim, *provided, however*, that an employee must submit a Proof of Claim Form by the
applicable Bar Date for all other claims, including claims for deferred compensation,

1 accrued paid leave, wrongful termination, harassment, hostile work environment,
2 retaliation, claims under one of the Debtors' collective bargaining agreements, claims
3 covered by the Debtors' workers' compensation insurance, or any other litigation or
4 pre-litigation claim;

5 h) any current directors and/or managers, officers and employees of the Debtors for
6 indemnification, contribution, or reimbursement;

7 i) any Debtor having a claim against another Debtor; and

8 j) any holder of an equity interest in a Debtor need not file a proof of interest with respect
9 to the ownership of such equity interest at this time; *provided, however*, that any holder
10 of an equity interest who wishes to assert a claim against a Debtor, including any claim
11 relating to such equity interest or the purchase or sale of such interest, must file a Proof
12 of Claim Form asserting such claim on or prior to the applicable Bar Date pursuant to
13 the procedures set forth herein.

14 7. The Debtors shall serve the General Bar Date Notice, substantially in the form attached
15 hereto as **Exhibit A**, and a Proof of Claim Form by first-class mail within three (3) business days after
16 entry of this Order on: (i) all known creditors of the Debtors, as reflected in the Debtors' books and
17 records; (ii) all parties on the Master Service List and Creditor Matrix; (iii) the U.S. Trustee; and (iv)
18 all relevant taxing authorities for the jurisdictions in which the Debtors do business.

19 8. The Debtors shall serve the Patient Bar Date Notice, substantially in the form attached
20 hereto as **Exhibit B**, and a Proof of Claim Form, by first-class mail within three (3) business days after
21 the Debtors file their Schedules and Statements on the Patient List.

22 9. The Debtors shall publish a notice, substantially in the form attached hereto as
23 **Exhibit D**, four (4) times in each of *The Pajaronian* and the *Santa Cruz Sentinel* beginning no later
24 than ten (10) business days after the date of service of this Order.

25 10. Proofs of Claim will be deemed timely filed only if actually received by Stretto, the
26 Debtors' claims and noticing agent, on or before the applicable Bar Date in accordance with the
27 following:

28 a) Proofs of claim must substantially conform to the Proof of Claim Form attached to the
Bar Date Order as **Exhibit C**.

b) Proofs of claim must be *actually received* by the Debtors' claims agent, Stretto, on or
before the applicable Bar Date, at the following address:

Watsonville Hospital Corporation, et al. Claims Processing Center
c/o Stretto,
410 Exchange, Suite 100
Irvine, CA 92602

1 Proofs of claim can also be submitted electronically through Stretto's website at the
2 following web address: <https://cases.stretto.com/WatsonvilleHospital/file-a-claim/>.
Proofs of claim submitted by facsimile or e-mail will not be accepted.

- 3 c) Proofs of claim will only be deemed timely filed if an original copy of the signed Proof
4 of Claim Form is actually received by Stretto at the address set forth above or through
5 electronic submission of the proof of claim through Stretto's website at the web address
6 set forth above on or before the applicable Bar Date.
- 7 d) Proofs of claim must: (i) be in writing and signed by the claimant or, if the claimant is
8 not an individual, by an authorized agent of the claimant; (ii) include supporting
9 documentation or, if voluminous, a summary of supporting documents and an
10 explanation as to why such documentation is not available and identify where such
11 supporting documentation may be obtained;³ and (iii) be denominated in United States
12 currency. To the extent possible, proofs of claim should be completed in English.
- 13 e) Section 503(b)(9) Claims shall be asserted through proofs of claim, and each proof of
14 claim asserting a Section 503(b)(9) Claim must also: (i) include the value of the goods
15 delivered to and received by the applicable Debtor in the twenty (20) days prior to the
16 Petition Date; (ii) attach documentation identifying the particular invoices
17 corresponding to the Section 503(b)(9) Claim; and (iii) attach documentation
18 demonstrating that the goods were actually received by the Debtors within the 20 days
19 preceding the Petition Date.
- 20 f) Each proof of claim must specify by name the Debtor against which the claim is
21 asserted and the corresponding case number. If the holder asserts a claim against more
22 than one Debtor, a separate proof of claim must be filed against each such Debtor. Any
23 claim filed against the joint administration case number 21-51477 that does not identify
24 a specific Debtor against which the claim is asserted will be deemed as filed only
25 against Watsonville Hospital Corporation.

26 11. Any person or entity that is required to file a Proof of Claim Form in the form and
27 manner specified in this Order and that fails to do so on or before the applicable Bar Date: (a) shall be
28 forever barred, estopped and enjoined from asserting such claim against the Debtors, their estates, or
the property of the estates or thereafter filing a Proof of Claim Form with respect thereto in the
Bankruptcy Cases; (b) shall not, with respect to such claim, be treated as a creditor of the Debtors for
the purpose of voting upon any plan in these proceedings; and (c) shall not receive or be entitled to
receive any payment or distribution of property from the Debtors or their successors or assigns with
respect to such claim.

12. The Debtors shall have authority to make non-substantive and non-material changes to
the Bar Date Notices without further order of the Court, including, without limitation, changes to

³ To the extent the supporting documentation concerns or contains individually identifiable health information, as such term is defined at 45 C.F.R. § 164.502, a claimant may file such documentation under seal without further order of the Court.

1 correct typographical and grammatical errors, insert dates, and to make conforming changes prior to
2 mailing and publication.

3 13. Nothing in the Motion or this Order, nor the Debtors' implementation of the relief
4 granted in this Order, shall constitute (a) an admission of the validity of any claim against the Debtors
5 or their estates; (b) a waiver of the Debtors' or any party in interest's right to dispute or object to any
6 claim, whether filed or scheduled, on any ground; (c) a waiver of the Debtors' or any party in interest's
7 right to dispute or assert offsets against or defenses to any claim, whether filed or scheduled, as to
8 amount, nature, classification, characterization, status, or otherwise; (d) a prohibition of the Debtors
9 or any applicable party in interest from taking any other action with respect to a prepetition claim; or
10 (e) a promise by the Debtors to pay any alleged claim.

11 14. Nothing contained herein shall limit, abridge or otherwise affect the Debtors' right to
12 request that the Court fix a date by which the holder of a claim that is specifically excluded from the
13 requirements to file such a claim by this Order must file a proof of claim.

14 15. The provisions of this Order apply to all claims (except as otherwise set forth herein)
15 of whatever character against the Debtors or their property, whether they are secured or unsecured,
16 entitled or not entitled to priority, liquidated or unliquidated, or fixed or contingent.

17 16. The Debtors are hereby authorized to take such steps as they deem reasonably
18 necessary to fulfill the notice requirements established by this Order.

19 17. This Court shall retain jurisdiction with respect to all matters arising from or related to
20 the implementation, interpretation or enforcement of this Order.

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EXHIBIT A
(General Bar Date Notice)

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7 Attorneys for Debtors and Debtors in Possession

8 **UNITED STATES BANKRUPTCY COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**
10 **SAN JOSE DIVISION**

11 In re:

12 WATSONVILLE HOSPITAL
CORPORATION, *et al.*,

13 Debtors.¹

Case No. 21-51477

Chapter 11
(Jointly Administered)

14 **NOTICE OF BAR DATES FOR FILING
PROOFS OF CLAIM**

15 **PLEASE TAKE NOTICE THAT:**

16 On December 5, 2021 (the “Petition Date”), Watsonville Hospital Corporation and certain of its affiliates,
17 the debtors and debtors-in-possession in the above-captioned cases (collectively, the “Debtors”), filed
voluntary petitions for relief under chapter 11 of the United States Bankruptcy Code (the “Bankruptcy Code”)
18 with the United States Bankruptcy Court for the Northern District of California, San Jose Division (the
“Bankruptcy Court”).

19 On January [7], 2022, the Bankruptcy Court entered an order [Docket No. ●] (the “Bar Date Order”)²
20 establishing certain deadlines for filing proofs of claim (“Proofs of Claim”) against the Debtors (the “Bar
21 Dates”), including a General Bar Date, Governmental Bar Date, Amended Schedules Bar Date, and Rejection
Bar Date (each as defined in the Bar Date Order).

22 The Bar Dates and the procedures set forth below for the filing of Proofs of Claim against the Debtors apply
23 to all claims against the Debtors that arose (or are deemed to have arisen) on or prior to the Petition Date,
including any claims arising under section 503(b)(9) of the Bankruptcy Code, except for the types of claims
listed in Section 2 below.

24 You may obtain a copy of the Bar Date Order and other case pleadings, including the Schedules, once filed
25 (as defined below), at the Debtors’ case website (<https://cases.stretto.com/WatsonvilleHospital>) or the

26 ¹ The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are:
27 Watsonville Hospital Corporation (4113); Watsonville Healthcare Management, LLC (4168); Watsonville Hospital
Holdings, Inc. (1118); and Halsen Healthcare, LLC. The Debtors’ business address is 75 Nielson Street, Watsonville, CA
95076.

28 ² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Bar Date
Order.

1 Bankruptcy Court’s website (www.canb.uscourts.gov) (for a fee). Copies of case pleadings also may be
2 examined between the hours of 9:00 a.m. and 3:00 p.m., Monday through Friday, excluding federal holidays,
3 at the Office of the Clerk of the Bankruptcy Court (the “Clerk”), 280 South First Street, Room 3035, San
4 Jose, CA 95113-3099. Finally, copies of case pleadings also may be obtained by written request to Stretto,
5 Inc. (“Stretto”), the Debtors’ court-appointed claims and noticing agent.

4 **1. WHO MUST FILE A PROOF OF CLAIM**

5 You **must** file a Proof of Claim (a “Proof of Claim Form”) to share in distributions from the Debtors’
6 bankruptcy estates if you hold a claim³ against the Debtors (including any claims arising under section
7 503(b)(9) of the Bankruptcy Code) that arose (or is deemed to have arisen) on or before the Petition Date,
8 and it is not one of the kinds of claims set forth in Section 2 below. You must file a Proof of Claim Form by
9 the applicable Bar Date even if your claim is not now fixed, liquidated, or certain or did not mature or become
10 fixed, liquidated or certain before the Petition Date.

11 Specifically, and without limiting the generality of Bankruptcy Rule 3003(c)(2), you **must** file a Proof of
12 Claim Form on or before the applicable Bar Date if:

- 13 a. your claim (i) is not listed in the Debtors’ Schedules filed with the Bankruptcy Court, or in
14 any supplements or amendments to the Schedules, or (ii) is listed in the Debtors’ Schedules
15 filed with the Bankruptcy Court, or in any supplements or amendments to the Schedules, as
16 “contingent,” “unliquidated,” or “disputed;”
- 17 b. your claim is listed in the Debtors’ Schedules filed with the Bankruptcy Court, or in any
18 supplements or amendments to the Schedules, and you disagree with the amount, nature,
19 classification, or characterization of the claim as set forth in the Schedules; or
- 20 c. you assert an administrative priority claim under section 503(b)(9) of the Bankruptcy Code.⁴

21 **2. EXCLUDED CLAIMS**

22 You do **not** need to file a Proof of Claim Form if:

- 23 a) you have already properly filed a proof of claim with Stretto or the Clerk of the Court for the
24 United States Bankruptcy Court for the Northern District of California in a form substantially
25 similar to Official Form 410;
- 26 b) your claim is listed in the Debtors’ Schedules and (i) the claim is not described as “disputed,”
27 “contingent,” or “unliquidated,” and (ii) you agree with the amount, nature, and priority of the
28 claim set forth in the Schedules;
- 29 c) your claim has been allowed by Court order on or before the applicable Bar Date;

30 ³ Under section 101(5) of the Bankruptcy Code and as used herein, the word “claim” means (i) a right to payment, whether
31 or not such right is reduced to judgment, liquidated, unliquidated, fixed, contingent, matured, unmatured, disputed,
32 undisputed, legal, equitable, secured or unsecured; or (ii) a right to an equitable remedy for breach of performance if such
33 breach gives rise to a right to payment, whether or not such right to an equitable remedy is reduced to judgment, fixed,
34 contingent, matured, unmatured, disputed, undisputed, secured or unsecured.

35 ⁴ Section 503(b)(9) of the Bankruptcy Code provides that “the value of any goods received by the debtor within 20 days
36 before the date of commencement of a case under this title in which the goods have been sold to the debtor in the ordinary
37 course of such debtor’s business” is entitled to administrative priority.

- 1 d) your claim has been satisfied in full by the Debtors or any other party prior to the applicable
2 Bar Date;
- 3 e) your claim is one for which the Court has already fixed a specific deadline to file a proof of
4 claim;
- 5 f) you are the MPT Prepetition Lender, the CNH Prepetition Lender, the DIP Lender, or any
6 successors thereto, with respect to claims arising from or concerning the loan agreements
7 referenced in the DIP Financing Motion (including the MPT Prepetition Obligations);
- 8 g) you are an employee of a Debtor and an order of the Court authorized such Debtor to honor
9 your claim in the ordinary course of business, and the Debtor actually paid such claim,
10 *provided, however*, that an employee must submit a Proof of Claim Form by the applicable Bar
11 Date for all other claims, including claims for deferred compensation, accrued paid leave,
12 wrongful termination, harassment, hostile work environment, retaliation, claims under one of
13 the Debtors' collective bargaining agreements, claims covered by the Debtors' workers'
14 compensation insurance, or any other litigation or pre-litigation claim;
- 15 h) you are a current director and/or manager, officer, or employee of the Debtors, with respect to
16 a claim for indemnification, contribution, or reimbursement;
- 17 i) you are a Debtor having a claim against another Debtor; and
- 18 j) you are a holder of an equity interest in a Debtor; *provided, however*, that any holder of an
19 equity interest who wishes to assert a claim against a Debtor, including any claim relating to
20 such equity interest or the purchase or sale of such interest, must file a Proof of Claim Form
21 asserting such claim on or prior to the applicable Bar Date pursuant to the procedures set forth
22 herein.

23 **You should not file a Proof of Claim Form if you do not have a claim against the Debtors. The fact
24 that you received this notice does not mean that you have a claim against the Debtors.**

25 **Additional copies of Proof of Claim Forms can be obtained at the Debtors' case website,
26 <https://cases.stretto.com/WatsonvilleHospital> or by emailing your request to
27 TeamWatsonvilleHospital@Stretto.com.**

28 **3. THE BAR DATES**

The Bar Date Order establishes the following Bar Dates for filing proofs of claim in these cases:

General Bar Date. Except as otherwise provided herein, each person or entity (including, without limitation, each individual, partnership, joint venture, corporation, limited liability company, estate, or trust) holding or asserting a claim against the Debtors that arose (or is deemed to have arisen) on or prior to the Petition Date (including any claims arising under section 503(b)(9) of the Bankruptcy Code) must file a Proof of Claim Form, so that it is **actually received** by Stretto **on or before April 4, 2022 at 4:00 p.m. (Pacific Time)** (the "**General Bar Date**").

Governmental Bar Date. Each governmental unit holding or asserting a claim against the Debtors that arose (or is deemed to have arisen) on or prior to the Petition Date must file a Proof of Claim Form so that it is **actually received** by Stretto **on or before June 3, 2022 at 4:00 p.m. (Pacific Time)**.

Amended Schedules Bar Date. If, on or after the date the Debtors serve this Notice, the Debtors amend their Schedules to change the amount, nature, classification or characterization of a claim, or to schedule a new

1 claim, the affected claimant may dispute the amount, nature, classification or characterization of the
2 scheduled claim by filing a Proof of Claim Form with respect to the scheduled claim, so that the Proof of
3 Claim Form is actually received by Stretto **on or before the later of (i) the General Bar Date or (ii) thirty
(30) days from the date notice is served alerting the affected creditor of the applicable amendment to
the Schedules.**

4 **Rejection Bar Date.** Each person or entity (including, without limitation, each individual, partnership, joint
5 venture, corporation, limited liability company, estate, and trust) holding or asserting a claim for any rejection
6 damages arising from the rejection of any unexpired lease or executory contract of a Debtor (an “Agreement”)
7 during the Bankruptcy Cases must file a Proof of Claim Form so that it is *actually received* by Stretto **on or
before the later of (i) 30 days after the entry of an order authorizing rejection of such Agreement or
pursuant to a notice under procedures approved by the Bankruptcy Court, (ii) any date set by another
order of the Bankruptcy Court, or (iii) the General Bar Date or the Governmental Bar Date, whichever
8 is applicable.**

9 **4. WHAT FORMS AND DOCUMENTS TO FILE**

10 Any Proof of Claim Form previously and properly filed with either Stretto or the Clerk prior to the mailing
11 of this Notice shall be deemed to be, and shall be treated as, a timely-filed claim subject to the rights of the
12 Debtors or any party-in-interest to object to the allowance thereof. No additional Proof of Claim Form is
13 required to be asserted with respect to such a previously-filed claim.

14 **If you have not filed your proof of claim yet,** a Proof of Claim Form should be submitted on the Proof of
15 Claim Form enclosed with this notice. Additional copies of the Proof of Claim Form and general
16 information related to these cases can be obtained at: <https://cases.stretto.com/WatsonvilleHospital> or by
17 emailing your request to Team.WatsonvilleHospital@Stretto.com.

18 **Proof of Claim Form.** If your claim is scheduled by the Debtors, the enclosed Proof of Claim Form sets
19 forth (i) the amount of the scheduled claim, if any; (ii) whether the claim is listed as disputed, contingent or
20 unliquidated; (iii) whether the claim is listed as a secured, unsecured priority or unsecured nonpriority claim;
21 and (iv) the identity of the Debtor against which the person or entity’s claim is scheduled. To the extent you
22 disagree with the information on the Proof of Claim Form, you should make the necessary changes to the
23 information on the Proof of Claim Form.

24 **503(b)(9) Claim.** If you assert a claim pursuant to section 503(b)(9) of the Bankruptcy Code you must
25 complete the appropriate box in the Proof of Claim Form and (i) identify the amount of such claim believed
26 to be entitled to administrative expense priority treatment under section 503(b)(9) of the Bankruptcy Code
27 and (ii) attach documentation supporting such claim. If you fail to identify the existence and amount of your
28 503(b)(9) Claim on the Proof of Claim Form, the claim will not be regarded as a 503(b)(9) Claim, and the
claim will not be entitled to priority treatment under section 503(b)(9) of the Bankruptcy Code.

All Proof of Claim Forms must be filed with **original signatures** and be denominated in lawful currency of
the United States. If possible, you should file your Proof of Claim Form in English. You should attach to
your completed Proof of Claim Form copies of any documents on which the claim is based or an explanation
as to why such documents are not available.⁵

Except as otherwise provided by the Bar Date Order, each Proof of Claim Form must state a claim against
only one Debtor and clearly indicate the Debtor against which the claim is asserted. To the extent more than
one Debtor is listed on the proof of claim, such claim will be treated as if filed only against Watsonville
Hospital Corporation. If a holder of a claim asserts a claim against more than one Debtor, a separate proof

⁵ To the extent the supporting documentation concerns or contains individually identifiable health information, as such
term is defined at 45 C.F.R. § 164.502, you may file such documentation under seal without further order of the Court.

1 of claim must be filed against each such Debtor.

2 **5. WHERE TO FILE**

3 Persons or entities filing Proof of Claim Forms must deliver such forms to Stretto at one of the following
4 addresses in the manner indicated below:

5 If by First-Class Mail:

6 **Watsonville Hospital Corporation, et al. Claims Processing Center**
7 **c/o Stretto**
8 **410 Exchange, Suite 100**
9 **Irvine, CA 92602**

10 Alternatively, claimants may submit a Proof of Claim electronically by completing the Proof of Claim Form
11 that can be accessed at Stretto's website: <https://cases.stretto.com/WatsonvilleHospital/file-a-claim/>. Proof
12 of Claim Forms will be deemed timely and properly filed only if such forms are actually received by Stretto
13 on or before the applicable Bar Date. Do not file your Proof of Claim Form with the Clerk.

14 **Proof of Claim Forms shall not be submitted by facsimile, telecopy, e-mail or other electronic means**
15 **(except for the Electronic Proof of Claim), and Proof of Claim Forms submitted by such means shall**
16 **not be deemed timely filed.**

17 Time-stamped copies of Proof of Claim Forms will not be returned unless you provide the Claims Agent with
18 a copy of your Proof of Claim Form and a self-addressed, postage pre-paid, envelope.

19 **CONSEQUENCES OF FAILURE TO TIMELY FILE PROOF OF CLAIM FORMS. ANY PERSON**
20 **OR ENTITY THAT IS REQUIRED TO FILE A PROOF OF CLAIM FORM IN THE FORM AND**
21 **MANNER SPECIFIED IN THE BAR DATE ORDER AND THAT FAILS TO DO SO ON OR BEFORE**
22 **THE APPLICABLE BAR DATE: (I) SHALL BE FOREVER BARRED, ESTOPPED, AND**
23 **ENJOINED FROM ASSERTING SUCH CLAIM AGAINST THE DEBTORS, THEIR ESTATES OR**
24 **THE PROPERTY OF THE ESTATES, OR THEREAFTER FILING A PROOF OF CLAIM FORM**
25 **WITH RESPECT THERETO IN THE CHAPTER 11 CASES; (II) SHALL NOT, WITH RESPECT**
26 **TO SUCH CLAIM, BE TREATED AS A CREDITOR OF THE DEBTORS FOR THE PURPOSE OF**
27 **VOTING UPON ANY PLAN IN THESE PROCEEDINGS; AND (III) SHALL NOT RECEIVE OR BE**
28 **ENTITLED TO RECEIVE ANY PAYMENT OR DISTRIBUTION OF PROPERTY FROM THE**
DEBTORS OR THEIR SUCCESSORS OR ASSIGNS WITH RESPECT TO SUCH CLAIM.

A HOLDER OF A POSSIBLE CLAIM AGAINST THE DEBTORS SHOULD CONSULT AN
ATTORNEY REGARDING ANY MATTERS NOT COVERED BY THIS NOTICE AND ANY
RELATED MATTERS, SUCH AS WHETHER THE HOLDER SHOULD FILE A PROOF OF CLAIM
FORM.

This notice is only a summary of the Bar Date Order, the terms of which control in the event of any conflict
with the information set forth in this notice. All creditors and other parties-in-interest are referred to the text
of the Bar Date Order itself and to the Bankruptcy Code, the Bankruptcy Rules and the Local Rules for
additional information regarding the filing and treatment of proofs of claim.

If you have any questions relating to this Notice, contact Questions concerning this Notice should be
directed to Stretto at 855.524.4733, or Team WatsonvilleHospital@Stretto.com.

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NEITHER THE ATTORNEYS FOR THE DEBTORS NOR STRETTO ARE AUTHORIZED TO PROVIDE YOU WITH LEGAL ADVICE.

Dated: PACHULSKI STANG ZIEHL & JONES LLP

By: /s/
Debra I. Grassgreen
Maxim B. Litvak
Steven W. Golden

Attorneys for Debtors and Debtors in Possession

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EXHIBIT B
(Patient Bar Date Notice)

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA (SAN JOSE DIVISION)**

In re:

WATSONVILLE HOSPITAL
CORPORATION, *et al.*,

Debtors.¹

Case No. 21-51477 (MEH)

Chapter 11

NOTICE OF DEADLINE FOR FILING PROOFS OF CLAIM

To Patients of Watsonville Community Hospital:

As you may be aware, Watsonville Hospital Corporation d/b/a Watsonville Community Hospital and certain of its affiliates (together, the “Debtors”) filed for chapter 11 protection on December 5, 2021. You are receiving this notice because the Debtors’ records indicate that you received treatment at Watsonville Community Hospital between December 1, 2018 and December 5, 2021.

Receipt of this notice does not mean that you have a claim against the Debtors. However, if you believe that you have a claim against any of the Debtors that arose prior to December 5, 2021, a Proof of Claim Form is included with this notice. All Proofs of Claim must be submitted so as to be actually received on or before **April 4, 2022 at 4:00 p.m. (PT)** at the following address:

**Watsonville Hospital Corporation, et al. Claims Processing Center c/o Stretto,
410 Exchange, Suite 100
Irvine, CA 92602**

Proofs of claim can also be submitted electronically through Stretto’s website at the following web address:
<https://cases.stretto.com/WatsonvilleHospital/file-a-claim/>.

If you have a claim against the Debtors but fail to file a Proof of Claim before April 4, 2022, you will lose your right to assert such claim against the Debtors and will not receive any distribution with respect to such claim. Filing a claim does not necessarily entitle you to or guarantee you payment. If you have questions about your specific claim, you should consult with your own lawyer.

ALL QUESTIONS OR INQUIRIES CONCERNING THIS NOTICE SHOULD BE DIRECTED TO THE DEBTORS’ CLAIMS AGENT, STRETTO, AT 855-524-4733 OR TEAMWATSONVILLEHOSPITAL@STRETTO.COM.

Very Truly Yours,

PACHULSKI STANG ZIEHL & JONES LLP
COUNSEL FOR DEBTORS AND DEBTORS-IN-POSSESSION

¹ The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are: Watsonville Hospital Corporation (4113); Watsonville Healthcare Management, LLC (4168); Watsonville Hospital Holdings, Inc. (1118); and Halsen Healthcare, LLC. The Debtors’ business address is 75 Nielson Street, Watsonville, CA 95076.

**TRIBUNAL DE QUIEBRAS DE LOS ESTADOS UNIDOS
DISTRITO NORTE DE CALIFORNIA (DIVISIÓN DE SAN JOSÉ)**

Asunto:

WATSONVILLE HOSPITAL
CORPORATION, *et al.*,

Deudores.¹

Caso n.º 21-51477 (MEH)

Capítulo 11

AVISO DE FECHA LÍMITE PARA LA PRESENTACIÓN DE PRUEBAS DE RECLAMACIÓN

A los pacientes de Watsonville Community Hospital:

Como ustedes saben, Watsonville Hospital Corporation, que opera bajo el nombre Watsonville Community Hospital, y algunos de sus afiliados (en conjunto, los “Deudores”) se acogieron a la protección del capítulo 11 de el Código de Quiebra el 5 de diciembre de 2021. Usted ha recibido este aviso porque los registros de los Deudores indican que usted recibió tratamiento u otros servicios médicos en Watsonville Community Hospital durante el periodo comenzando el 1 de diciembre de 2018 hasta el 5 de diciembre de 2021.

La recepción de este aviso no implica que usted tenga una reclamación o demanda en contra de los Deudores. Sin embargo, si usted considera que tiene una reclamación o demanda en contra de cualquiera de los Deudores que haya surgido antes del 5 de diciembre de 2021, se incluye en este aviso un formulario de prueba de reclamación. Todas las pruebas de reclamación deben presentarse de manera que se reciban efectivamente el **4 de abril de 2022 a las 4:00 p. m. (hora del Pacífico)** o antes de esa fecha a la siguiente dirección:

**Watsonville Hospital Corporation, et al. Claims Processing Center c/o Stretto,
410 Exchange, Suite 100
Irvine, CA 92602**

Las pruebas de reclamación también pueden presentarse electrónicamente a través del sitio web de Stretto en la siguiente dirección web: <https://cases.stretto.com/WatsonvilleHospital/file-a-claim/>.

Si usted tiene una reclamación o demanda en contra de los Deudores pero no presenta una prueba de reclamación antes del 4 de abril de 2022, perderá el derecho de alegar dicha reclamación o demanda en contra de los Deudores y no participará en ninguna distribución relacionada con dicha reclamación o demanda. La presentación de una reclamación no necesariamente le otorga derecho a recibir un pago ni lo garantiza. Si tiene preguntas sobre su reclamación específica, debe consultar a su abogado personal.

TODAS LAS PREGUNTAS O CONSULTAS RELACIONADAS CON ESTE AVISO DEBEN DIRIGIRSE AL AGENTE DE RECLAMACIONES DE LOS DEUDORES, STRETTO, LLAMANDO AL 855-524-4733 O ESCRIBIENDO A TEAMWATSONVILLEHOSPITAL@STRETTO.COM.

Atentamente.

PACHULSKI STANG ZIEHL & JONES LLP
ABOGADOS DE LOS DEUDORES Y DEUDORES EN
POSESIÓN

¹ Los Deudores en estos casos, mencionados con los últimos cuatro dígitos del número de identificación para el impuesto federal correspondiente a cada uno, son los siguientes: Watsonville Hospital Corporation (4113); Watsonville Healthcare Management, LLC (4168); Watsonville Hospital Holdings, Inc. (1118); y Halsen Healthcare, LLC. La dirección comercial de los Deudores es 75 Nielson Street, Watsonville, CA 95076.

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EXHIBIT C
(Proof of Claim Form)

Fill in this information to identify the case:

Name of Debtor & Case Number:

- Watsonville Hospital Corporation (Case No. 21-51477)
- Watsonville Healthcare Management, LLC (Case No. 21-51478)
- Watsonville Hospital Holdings, Inc. (Case No. 21-51479)
- Halsen Healthcare, LLC (Case No. 21-51480)

United States Bankruptcy Court for the Northern District of California

Official Form 410
Proof of Claim

04/19

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. With the exception of administrative expenses arising under 11 U.S.C. §503(b)(9), do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. **Do not send original documents;** they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is December 5, 2021.

Part 1: Identify the Claim

1. Who is the current creditor?

Name of the current creditor (the person or entity to be paid for this claim) _____

Other names the creditor used with the debtor _____

2. Has this claim been acquired from someone else?

- No
- Yes. From whom? _____

3. Where should notices and payments to the creditor be sent?

Where should notices to the creditor be sent?

Where should payments to the creditor be sent? (if different)

Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)

Name _____

Name _____

Street Address _____

Street Address _____

City _____ State _____ ZIP Code _____

City _____ State _____ ZIP Code _____

Contact phone _____

Contact phone _____

Contact email _____

Contact email _____

4. Does this claim amend one already filed?

- No
- Yes. Claim number on court claims registry (if known) _____

Filed on _____
MM / DD / YYYY

5. Do you know if anyone else has filed a proof of claim for this claim?

- No
- Yes. Who made the earlier filing? _____

Part 2: Give Information About the Claim as of the Date the Case Was Filed

6. Do you have any number you use to identify the debtor? No
 Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: _____

7. How much is the claim? \$_____ Does this amount include interest or other charges?
 No
 Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).

8. What is the basis of the claim? Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card.
Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c).
Limit disclosing information that is entitled to privacy, such as health care information.

9. Is all or part of the claim secured? No
 Yes. The claim is secured by a lien on property.

Nature of property:
 Real estate. If the claim is secured by the debtor's principal residence, file a *Mortgage Proof of Claim Attachment* (Official Form 410-A) with this *Proof of Claim*.
 Motor vehicle
 Other. Describe: _____

Basis for perfection: _____
Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)

Value of property: \$ _____
Amount of the claim that is secured: \$ _____
Amount of the claim that is unsecured: \$ _____ (The sum of the secured and unsecured amounts should match the amount in line 7.)

Amount necessary to cure any default as of the date of the petition: \$ _____

Annual Interest Rate (when case was filed) _____ %
 Fixed
 Variable

10. Is this claim based on a lease? No
 Yes. Amount necessary to cure any default as of the date of the petition. \$ _____

11. Is this claim subject to a right of setoff? No
 Yes. Identify the property: _____

12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?

No

Yes. Check all that apply:

Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).

Up to \$3,025* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).

Wages, salaries, or commissions (up to \$13,650*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).

Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).

Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).

Other. Specify subsection of 11 U.S.C. § 507(a)() that applies.

Amount entitled to priority

\$ _____

\$ _____

\$ _____

\$ _____

\$ _____

\$ _____

* Amounts are subject to adjustment on 4/01/22 and every 3 years after that for cases begun on or after the date of adjustment.

13. Is all or part of the claim entitled to administrative priority pursuant to 11 U.S.C. § 503(b)(9)?

No

Yes. Indicate the amount of your claim arising from the value of any goods received by the Debtor within twenty (20) days before the date of commencement of the above case, in which the goods have been sold to the Debtor in the ordinary course of such Debtor's business. Attach documentation supporting such claim.

\$ _____

Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

I am the creditor.

I am the creditor's attorney or authorized agent.

I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.

I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date _____
MM / DD / YYYY

Signature

Print the name of the person who is completing and signing this claim:

Name _____
First name Middle name Last name

Title _____

Company _____
Identify the corporate servicer as the company if the authorized agent is a servicer.

Address _____
Number Street

City State ZIP Code

Contact phone _____ Email _____

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EXHIBIT D
(Publication Notice)

Para mas información, o si tiene preguntas sobre este aviso, llame al 855-524-4733 (sin cargo), o envíe por correo electrónico a teamwatsonvillehospital@stretto.com, o visite <https://cases.stretto.com/watsonvillehospital>

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

In re:

WATSONVILLE HOSPITAL
CORPORATION, *et al.*,

Debtors.¹

Case No. 21-51477

Chapter 11
(Jointly Administered)

**NOTICE OF ENTRY OF BAR DATE
ORDER ESTABLISHING DEADLINES
FOR FILING PROOFS OF CLAIM**

PLEASE TAKE NOTICE THAT:

On December 5, 2021 (the “Petition Date”), Watsonville Hospital Corporation and certain of its affiliates, the debtors and debtors-in-possession in the above-captioned cases (collectively, the “Debtors”), filed voluntary petitions for relief under chapter 11 of the United States Bankruptcy Code (the “Bankruptcy Code”) with the United States Bankruptcy Court for the Northern District of California, San Jose Division (the “Bankruptcy Court”).

On January [7], 2022, the Bankruptcy Court entered an order [Docket No. ●] (the “Bar Date Order”)² establishing certain deadlines for filing proofs of claim (“Proofs of Claim”) against the Debtors (the “Bar Dates”), including a General Bar Date, Governmental Bar Date, Amended Schedules Bar Date, and Rejection Bar Date (each as defined in the Bar Date Order).

General Bar Date. Except as otherwise provided in the Bar Date Order, each person or entity (including, without limitation, each individual, partnership, joint venture, corporation, limited liability company, estate, or trust) holding or asserting a claim against the Debtors that arose (or is deemed to have arisen) on or prior to the Petition Date (including any claims arising under section 503(b)(9) of the Bankruptcy Code) must file a Proof of Claim Form, so that it is **actually received** by Stretto **on or before April 4, 2022 at 4:00 p.m. (Pacific Time)** (the “General Bar Date”).

Governmental Bar Date. Each governmental unit holding or asserting a claim against the Debtors that arose (or is deemed to have arisen) on or prior to the Petition Date must file a Proof of Claim Form so that it is **actually received** by Stretto **on or before June 3, 2022 at 4:00 p.m. (Pacific Time)**.

Proof of Claim Forms and the Bar Date Order can be obtained at the Debtors’ case website, <https://cases.stretto.com/WatsonvilleHospital> or by emailing your request to TeamWatsonvilleHospital@Stretto.com.

Proof of Claim Forms must be delivered to Stretto, so that such forms are **actually received** by Stretto by the

¹ The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are: Watsonville Hospital Corporation (4113); Watsonville Healthcare Management, LLC (4168); Watsonville Hospital Holdings, Inc. (1118); and Halsen Healthcare, LLC. The Debtors’ business address is 75 Nielson Street, Watsonville, CA 95076.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Bar Date Order.

applicable Bar Date, at one of the following addresses in the manner indicated below:

**Watsonville Hospital Corporation, et al. Claims Processing Center
c/o Stretto,
410 Exchange, Suite 100
Irvine, CA 92602**

Alternatively, claimants may submit a Proof of Claim electronically by completing the Proof of Claim Form that can be accessed at Stretto's website: <https://cases.stretto.com/WatsonvilleHospital/file-a-claim/>. Proof of Claim Forms will be deemed timely and properly filed only if such forms are ***actually received*** by Stretto on or before the applicable Bar Date. Do not file your Proof of Claim Form with the Clerk.

Proof of Claim Forms shall not be submitted by facsimile, telecopy, e-mail or other electronic means (except for the Electronic Proof of Claim), and Proof of Claim Forms submitted by such means shall not be deemed timely filed.

Any person or entity that is required to file a Proof of Claim Form in the form and manner specified in the Bar Date Order and that fails to do so on or before the applicable Bar Date: (i) shall be forever barred, estopped and enjoined from asserting such claim against the Debtors, their estates or the property of the estates, or thereafter filing a Proof of Claim Form with respect thereto in the Bankruptcy Cases; (ii) shall not, with respect to such claim, be treated as a creditor of the Debtors for the purpose of voting upon any plan in these proceedings; and (iii) shall not receive or be entitled to receive any payment or distribution of property from the Debtors or their successors or assigns with respect to such claim.

If you have any questions relating to this Notice, contact Questions concerning this Notice should be directed to Stretto at 855.524.4733, or [Team WatsonvilleHospital@Stretto.com](mailto:TeamWatsonvilleHospital@Stretto.com).

NEITHER THE ATTORNEYS FOR THE DEBTORS NOR STRETTO ARE AUTHORIZED TO PROVIDE YOU WITH LEGAL ADVICE.

Dated:

PACHULSKI STANG ZIEHL & JONES LLP

Attorneys for Debtors and Debtors in Possession

Para mas información, o si tiene preguntas sobre este aviso, llame al 855-524-4733 (sin cargo), o envíe por correo electrónico a teamwatsonvillehospital@stretto.com, o visite <https://cases.stretto.com/watsonvillehospital>

****END OF ORDER****

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All ECF Parties