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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 6, 2022, the Bankruptcy Court entered an order [Docket No. 171] (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
28 95076.

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**
4 **(30) days from the date notice is served alerting the affected creditor of the applicable amendment to**
5 **the Schedules.**

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

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

33 Except as otherwise provided by the Bar Date Order, each Proof of Claim Form must state a claim against
34 only one Debtor and clearly indicate the Debtor against which the claim is asserted. To the extent more than
35 one Debtor is listed on the proof of claim, such claim will be treated as if filed only against Watsonville
36

37
38 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 Hospital Corporation. If a holder of a claim asserts a claim against more than one Debtor, a separate proof
2 of claim must be filed against each such Debtor.

3 **5. WHERE TO FILE**

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

6 If by First-Class Mail:

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

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

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

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

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

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: January 7, 2022

PACHULSKI STANG ZIEHL & JONES LLP

By: /s/ Debra I. Grassgreen

Debra I. Grassgreen

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